

Lee County CDBG-DR ACTION PLAN

Hurricanes Helene & Milton



COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY FUNDS



Version: 1.0
Last Updated: March 2025



Lee County
Southwest Florida

Lee Board of County Commissioners
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RECORD OF AMENDMENTS

The following table summarizes amendments to Lee County Florida’s Disaster Recovery Action Plan.

DATE ACTION PLAN WAS INITIALLY APPROVED BY HUD
TBD

DATE AMENDMENT APPROVED BY HUD	AMENDMENT NUMBER	DESCRIPTION OF AMENDMENT

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I. EXECUTIVE SUMMARY

Lee County will receive \$100,683,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support long-term recovery efforts from 2024 hurricanes Helene and Milton. This funding will be used primarily to restore impacted housing stock and public infrastructure, provide disaster relief assistance to low- and moderate-income families, and improve behavioral health service outcomes in our community.

Preliminary storm impact data indicate that public infrastructure restoration and single-family home rehabilitation are the largest remaining unmet needs in our community following the 2024 storms. When coupled with the ongoing recovery efforts related to Hurricane Ian through the work being done with prior direct allocation CDBG-DR funding—the bulk of which is currently allocated to affordable housing development and preservation—Lee County proposes to allocate Helene and Milton funding as follows:

Table 1. ALLOCATIONS OVERIVEW

Category	Unmet Need	% of Unmet Need	Program Allocation	% of Programs
Admin/Contingency	-	N/A	\$5,034,150	5%
Planning	\$0	-%	\$0	-%
Housing	\$200,337,185	33%	\$43,013,400	43%
Infrastructure	\$250,042,387	42%	\$37,533,000	37%
Econ Revitalization	\$157,222,089	26%	\$0	-%
Public Services	\$0	-%	\$15,102,450	15%
Total	\$607,601,661.32	100%	\$100,683,000	100%

In order to provide meaningful impact with the limited funds available, Lee County is choosing to administer fewer programs and focus on providing individual housing assistance and addressing infrastructure needs. The funds allocated to Infrastructure activities will be leveraged by funding the required 25 percent local match for projects assisted through FEMA’s Hazard Mitigation Grant Program (HMGP) or other federal funds, as allowed in the Universal Notice ([90 FR 1754](#)). All infrastructure projects will serve to directly address infrastructure unmet needs while also supporting housing and economic development in the impacted communities.

At least 70% of CDBG-DR grant funds allocated through this Action Plan will benefit low- and moderate-income (LMI) households.

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A. OVERVIEW

On January 7, 2025, the U.S. Department of Housing and Urban Development (HUD) announced that Lee County, Florida will receive \$100,683,000 in funding to support long-term recovery efforts for Hurricane Helene (4828) and Hurricane Milton (4834). Community Development Block Grant-Disaster Recovery funding is designed to address needs that remain after all other assistance has been exhausted. This Action Plan details how funds will be allocated to address remaining unmet needs in Lee County.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$100,683,000 in the CDBGDR funds to Lee County in response to Hurricane Helene (4828) and Hurricane Milton (4834), through the publication of the Federal Register, Vol. 90, No. 10, January 16, 2025, hereafter referred to as the Allocation Announcement Notice (AAN). This allocation was made available through the Consolidated Appropriations Act, 2025 (Pub. L. 118–158).

Lee County is committed to deploying CDBG-DR funds to benefit low- and moderate-income households and areas, in accordance with Section 103 of the Housing and Community Development Act. As detailed in the unmet needs assessment, roughly 41 percent of the remaining 2023 and 2024 unmet disaster recovery needs are in infrastructure (\$250M); 33 percent in the housing sector (\$200.3M); and 26 percent in the economy (\$157.2M). These estimates make it clear that the current funding is insufficient to meet the total unmet needs for Lee County and that funds must be prioritized toward housing and infrastructure programs. However, should HUD make additional funding available in the future, Lee County through its Department of Strategic Resources & Government Affairs as lead and responsible agency for CDBG-DR administration, may include additional programs to address remaining unmet needs.

Directing federal funds allocated to Lee County toward the most urgent needs concerning public infrastructure and safe, affordable housing is critical to both assist impacted residents directly and ensure full economic recovery. As outlined in Table 5: Unmet Need and Proposed Allocation, the proposed allocation of \$43,013,400 to address housing unmet needs would fund the Housing Rehabilitation, Reconstruction and Elevation (HRRE) Program. Additionally, the proposed allocation of \$37,533,000 to address unmet infrastructure needs would be distributed through two programs: 1) the Mitigation (MIT) – Public Facility and infrastructure Program which may include Hazard Mitigation Grant Program (HMGP), Federal Highway Administration (FHWA), other non-federal matching funds for eligible activities, or fully funded MIT projects; and 2) Critical Infrastructure and Public Facility Program which supports activities that have a direct tie-back to Hurricane and/or Hurricane Milton. The Critical Infrastructure and Public Facility Program

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may include repair of roads, sidewalks and stormwater facilities damaged by the storms; resiliency enhancements for impacted infrastructure; and property acquisition for construction of eligible projects. See further details in Section VII: FUNDING CRITERIA.

State and local government grantees must expend the funds within six years of receiving the executed agreement from HUD unless an extension is granted by HUD. To ensure that projects are deployed in a timely manner and to streamline the recovery process, HUD provided multiple waivers and flexibilities in the Universal Notice (90 FR 1754) as amended by Memorandum 25-02¹ and AAN (90 FR 4759). Lee County will utilize these waivers and flexibilities as much as possible to ensure quick deployment of funds and a speedy recovery for the community.

B. DISASTER SPECIFIC OVERVIEW

While still recovering from Hurricane Ian, Lee County experienced significant impacts from major Hurricanes Helene and Milton. Damage data analyzed through the unmet needs assessment show that Hurricane Helene and Hurricane Milton caused more than \$607.6 million in damage Countywide. These storms are responsible for more than 546,734 cubic yards of debris in unincorporated areas alone.

Hurricane Ian was one of the costliest weather disasters to strike the State of Florida. On Wednesday, September 28, 2022, Hurricane Ian made landfall at Cayo Costa in Lee County as a strong Category 4 hurricane with top wind speeds of 150 mph. Over ten feet of storm surge impacted the barrier islands, Fort Myers Beach, Sanibel and unincorporated coastal areas along the Caloosahatchee River. Major infrastructure systems failed which left much of the County without electric power or access to potable water for prolonged periods.

On September 26, 2024, Hurricane Helene made landfall in the Big Bend area as a Category 4 storm with winds reaching 140 miles per hour. Lee County experienced winds up to 65 miles per hour and had peak water levels up to 5 feet.² Flooding levels experienced along Lee County's coastal communities varied by location. High water marks collected following Hurricane Helene revealed an average of 2 feet of inundation experienced by structures located within 250 feet of open water, with a recorded maximum of 4.5 feet along the lowest-lying areas.

Less than two weeks after Helene, Hurricane Milton made landfall near Siesta Key on October 9, 2024. Milton was a Category 3 storm with 120 mile per hour sustained winds. High water marks

¹ All references to 90 FR 1754 within this Action Plan shall be construed to include all amendments set forth in Memorandum 25-02, issued by the U.S. Department of Housing and Urban Development (HUD) on March 19, 2025.

² National Weather Service:

https://www.weather.gov/media/tbw/TropicalEventSummary/PSHTBW_2024AL09_Helene_ImpactNarratives.pdf

collected following Hurricane Milton revealed an average of 2 feet of inundation experienced by structures located within 800 feet of open water, with a recorded maximum of 6 feet along the lowest-lying areas. More reports of flooding were recorded within communities located further inland along the Caloosahatchee River for Hurricane Milton than what was experienced for Hurricane Helene.³

The County's already battered housing and infrastructure experienced additional damage from both Helene and Milton. FEMA Individual assistance data indicates that 1,237 residential properties experienced moderate or greater damage. Damage data analyzed through the unmet needs assessment show that remaining infrastructure damage will cost approximately \$250 million to repair.

1. Disaster Declarations

On September 28, 2024, Governor Ron DeSantis requested an expedited major disaster declaration due to Hurricane Helene on September 23, 2024. The Governor requested a declaration for Individual Assistance and Public Assistance, including direct federal assistance for 31 counties and Hazard Mitigation statewide. This event was of the severity and magnitude that the need for supplemental Federal assistance was determined to be necessary prior to the completion of joint Federal, State, Tribal, and local government Preliminary Damage Assessments (PDAs). A presidential disaster declaration was issued on September 28, 2024, making Individual Assistance available to affected individuals and households in Alachua, Baker, Bradford, Charlotte, Citrus, Collier, Columbia, Desoto, Dixie, Duval, Franklin, Gilchrist, Gulf, Hamilton, Hernando, Hillsborough, Jefferson, Lafayette, Lee, Leon, Levy, Madison, Manatee, Pasco, Pinellas, Putnam, Suwannee, Sarasota, Taylor, Union, and Wakulla Counties.⁴

On October 11, 2024, Governor Ron DeSantis requested an expedited major disaster declaration due to Hurricane Milton beginning on October 5, 2024, and requested a declaration for Individual Assistance and Public Assistance, including direct federal assistance for 34 counties. October 11, 2024, a presidential disaster declaration was issued for the State of Florida. This declaration made Individual Assistance requested by the Governor available to affected individuals and households in Brevard, Charlotte, Citrus, Clay, Collier, DeSoto, Duval, Flagler, Glades, Hardee, Hendry, Hernando, Highlands, Hillsborough, Indian River, Lake, Lee, Manatee, Marion, Martin,

³ National Weather Service:

https://www.weather.gov/media/tbw/TropicalEventSummary/PSHTBW_2024AL14_Milton_Tornadoes.pdf

⁴ FEMA Preliminary Disaster Assessment:

https://www.fema.gov/sites/default/files/documents/PDARreport_FEMA4828DRexpedited-FL.pdf

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Okeechobee, Orange, Osceola, Palm Beach, Pasco, Pinellas, Polk, Putnam, Sarasota, Seminole, St. Johns, St. Lucie, Sumter, and Volusia Counties and the Miccosukee Tribe of Indians of Florida.⁵

Figure 1. Hurricane Helene Disaster Declaration

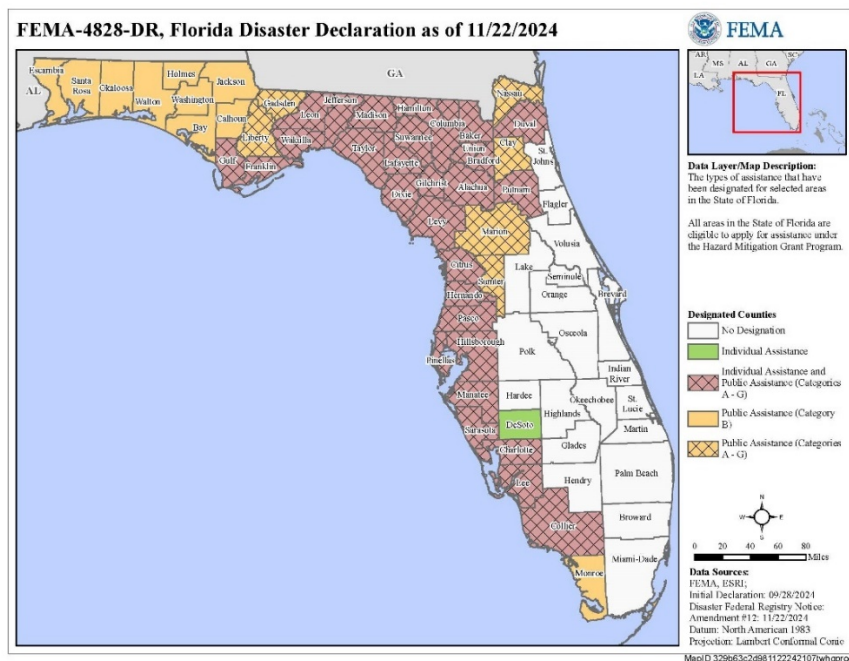
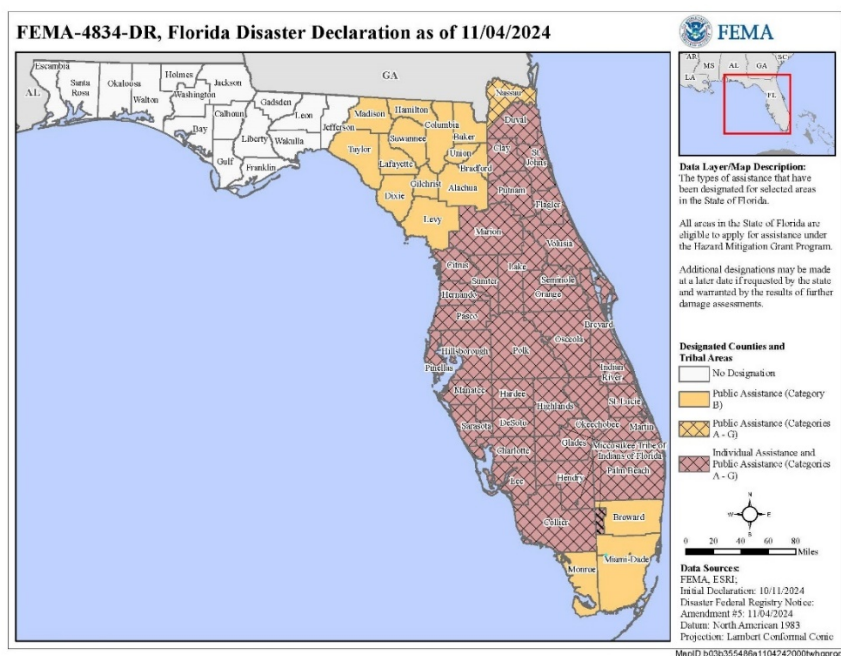


Figure 2. Hurricane Milton Disaster Declaration



⁵ FEMA Preliminary Damage Assessment:
https://www.fema.gov/sites/default/files/documents/PDARreport_FEMA4834DRexpedited-FL.pdf

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Impacts of back-to-back storms, recovery remains a challenge for many households and communities. An official State of Local Emergency remains in effect in Lee County as of April 1, 2025.

The projects outlined within this plan were selected through an evaluation of unmet needs resulting from these storms and an evaluation of risks for future disaster impacts. CDBG-DR funds will support hazard mitigation and recovery for infrastructure and housing, as well as provide public services to ensure individual household and community-wide recovery and resilience.

In accordance with the Universal Notice (90 FR 1754) and AAN (90 FR 4759) governing these funds, Lee County submits this Public Action Plan to serve as the blueprint for the successful implementation of CDBG-DR funded programs. This plan may be amended as community needs change.

The initial draft plan was made available for public comment and feedback between February 18, 2025, and March 20, 2025.

2. Most Impacted and Distressed Areas

a) HUD identified MID Areas

HUD identified the entirety of Lee County, Florida as a most impacted and distressed (MID) area. This declaration is a result of the significant unmet need remaining within Lee County following the 2024 hurricane season. As a local government recipient of CDBG-DR funds, Lee County is committed to expending 100% of the total allocation within the MID.



Figure 3. Location of Lee County, Florida



3. Overview of the Impacts of the Qualifying Disaster

CDBG-DR funds were provided to Lee County to address unmet recovery needs from qualifying disasters: Hurricane Helene and Hurricane Milton (Table 2). These disasters brought heavy winds, storm surge, tornadoes and flooding to many areas of Lee County. The impacts further exacerbated continued unmet recovery needs remaining from Hurricane Ian, which occurred in 2022.

Table 2. Disaster Overview

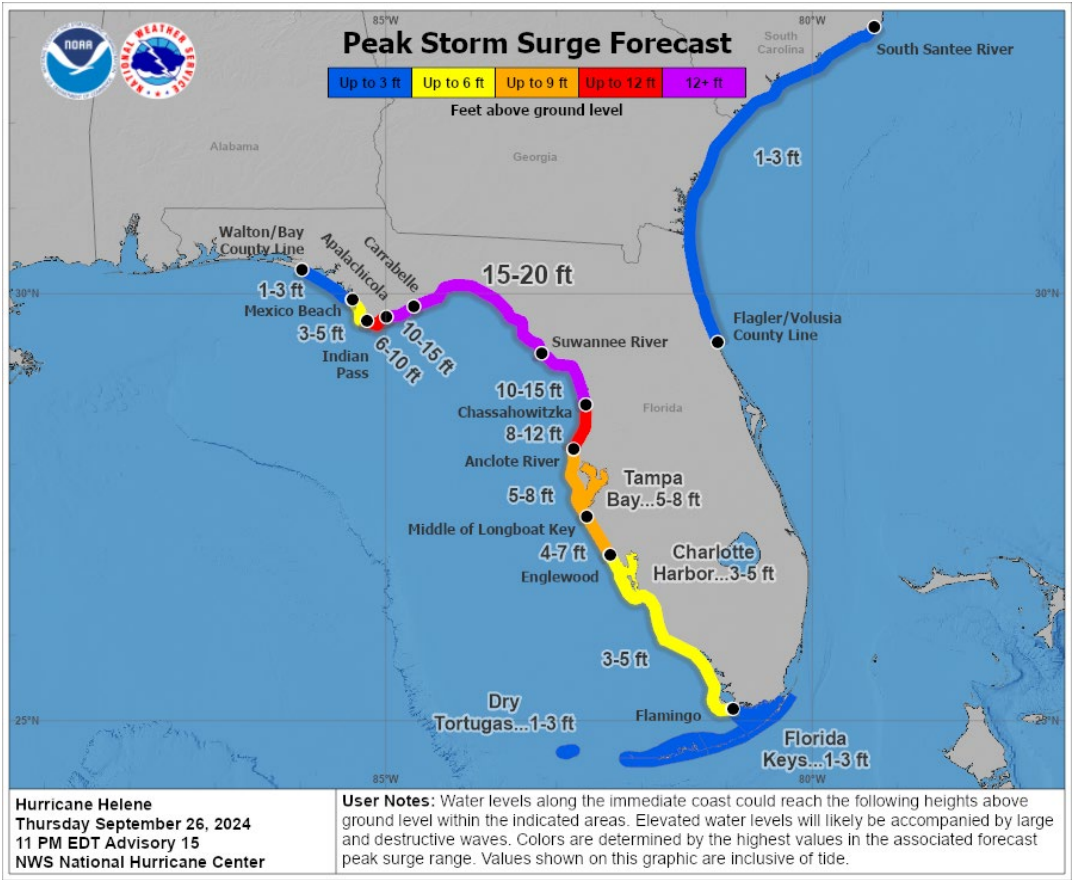
Disaster Summary	
Qualifying Disaster:	Hurricane Helene (4828) and Hurricane Milton (4834)
HUD-identified MID Areas:	Lee County, FL
Grantee-Identified MID Areas	Lee County, FL

⁶ Map created by Lee County using ArcGIS software.



On September 26, 2024, Hurricane Helene made landfall in the Big Bend area as a Category 4 storm with winds reaching 140 miles per hour. Lee County experienced winds up to 65 miles per hour and had peak water levels up to 5 feet. Portions of Lee County experienced peak storm surge (Figure 4) of three to five feet from Helene⁷. Storm surge infiltrated homes and businesses, many of which who had recently made repairs following Hurricane Ian.

Figure 4. Hurricane Helene - Peak Storm Surge Forecast

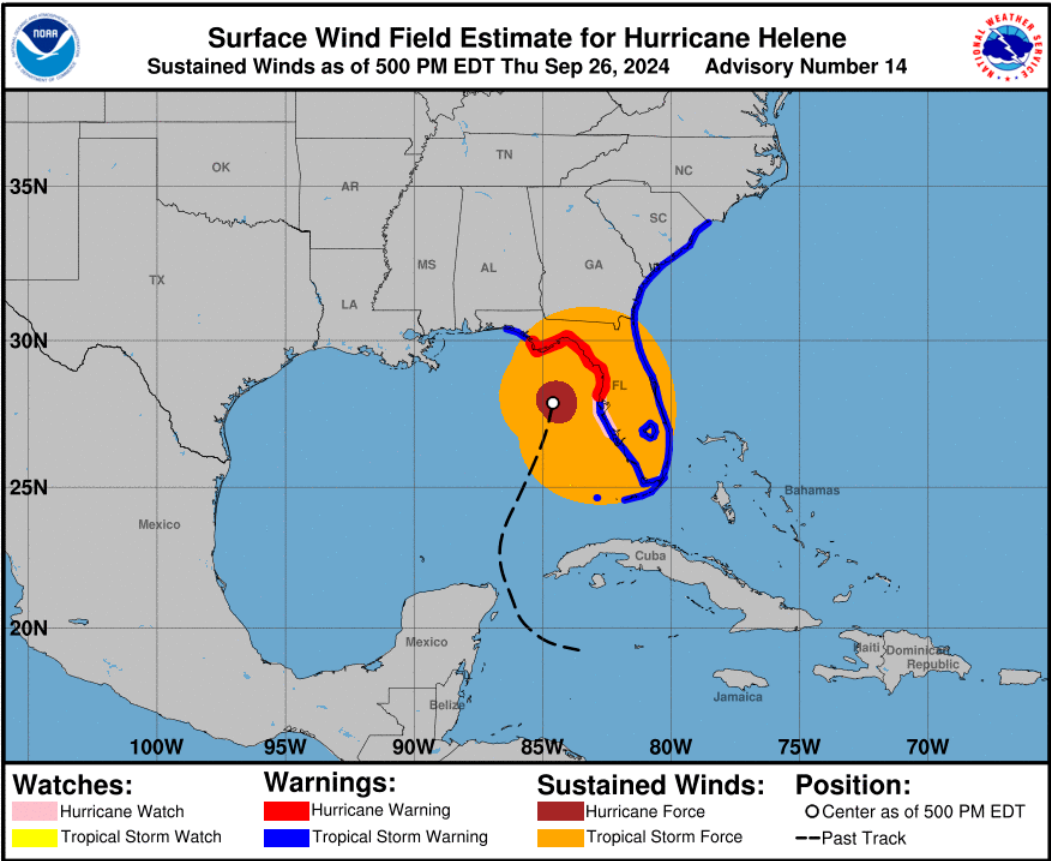


⁷ NOAA Peak Surge: https://www.nhc.noaa.gov/archive/2024/HELENE_graphics.php?product=peak_surge



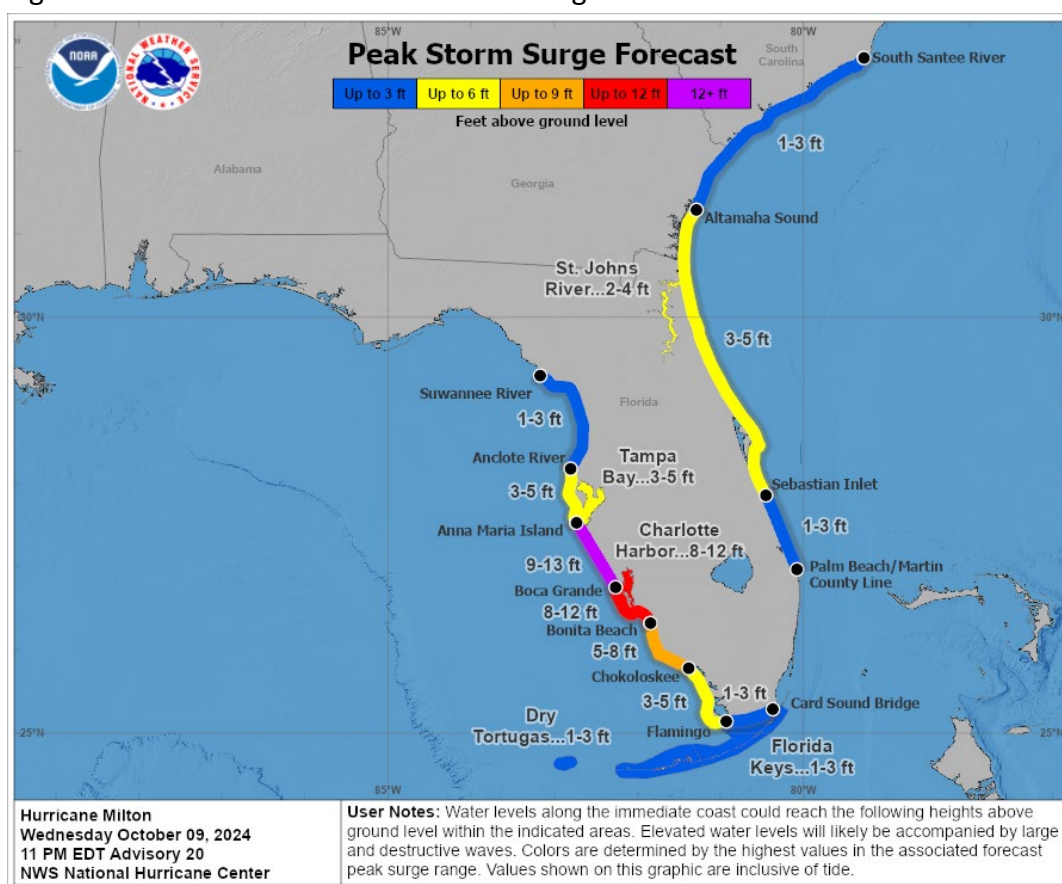
Hurricane Helene’s sustained tropical storm force winds⁸ (Figure 5) caused power outages and roof, building, and infrastructure damage to homes, businesses, and public facilities across the County, compounding the damage caused by flooding and storm surge.

Figure 5. Hurricane Helene - Surface Wind Estimate



⁸NOAA Initial Wind Field: https://www.nhc.noaa.gov/archive/2024/HELENE_graphics.php

Figure 6. Hurricane Milton - Peak Storm Surge Forecast

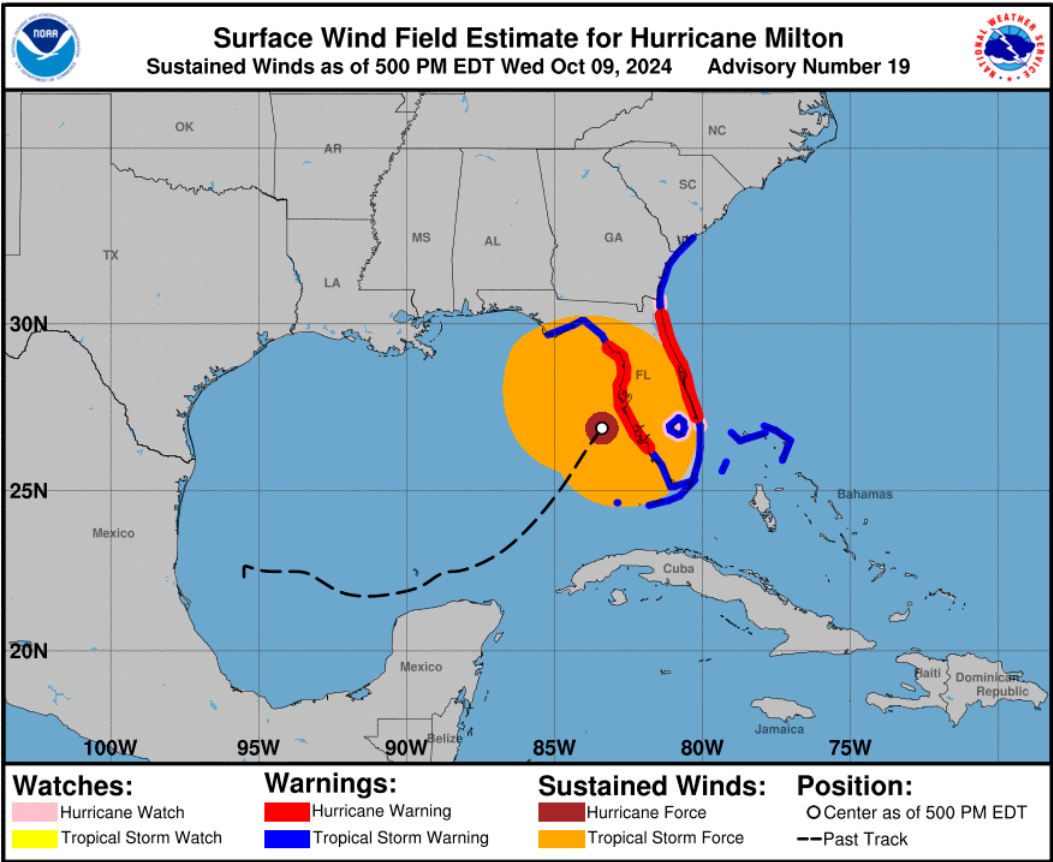


⁹ NOAA Peak Storm Surge: https://www.nhc.noaa.gov/archive/2024/MILTON_graphics.php?product=peak_surge



Wind damage from Hurricane Helene was further compounded by Milton’s sustained tropical force winds¹⁰ (Figure 7) within Lee County.

Figure 7. Hurricane Milton - Surface Wind Estimate



An EF1 tornado with an estimated peak wind of 105 miles per hour began at 11:54 am on October 9, 2024, near Matlacha. The tornado caused roof and siding damage to several homes along the track. Matlacha had been severely impacted by Hurricane Ian, and many residents have experienced challenges making repairs to their home due to delayed insurance assistance, elevation requirements and other factors. The impacts of this tornado, paired with back-to-back flooding and storm surge has left the housing stock in this area in severe disrepair.

An EF2 tornado with an estimated peak wind of 132 miles per hour began at 12:09 pm on October 9, 2024, south of the Fort Myers Villas area and moved northward into North Fort Myers. The strongest damage in Fort Myers was noted to the north-northwest across Colonial Boulevard

¹⁰ NOAA Initial Wind Field: https://www.nhc.noaa.gov/archive/2024/MILTON_graphics.php



along Orangewood Avenue. The tornado caused significant damage to residential and commercial structures throughout the US-41 corridor in North Fort Myers.¹¹

To meet disaster recovery needs, HUD has allocated \$100,683,000 in CDBG-DR funds (Table 3) to Lee County in response to Hurricanes Helene and Milton through the publication of the Universal Notice Federal Register, 90 FR 1754 (effective January 13, 2025, <https://www.govinfo.gov/content/pkg/FR-2025-01-08/pdf/2024-31621.pdf>) and Allocation Announcement Notification (AAN) Federal Register, 90 FR 4759 (effective *January 21, 2025*, <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>)). This allocation was made available through PL 118-158: Consolidated Appropriations Act, 2025.

Table 3. CDBG-DR Allocation Overview

CDBG-DR Allocation Overview	
CDBG-DR Allocation:	\$87,550,000.00
CDBG-DR Mitigation Set Aside:	\$13,133,000.00
Total Allocation:	\$100,683,000.00

¹¹ NOAA Milton Tornado Damage Report:
https://www.weather.gov/media/tbw/TropicalEventSummary/PSHTBW_2024AL14_Milton_Tornadoes.pdf



C. UNMET NEEDS ANDMITIGATION NEEDS SUMMARY

Unmet needs are calculated for each of the HUD defined sectors (housing, infrastructure, and economic revitalization) based on guidance provided by HUD in its Allocation Announcement Notification effective on January 21, 2025, and Universal Notice effective on January 13, 2025 (“herein after referred to as “applicable notices”). The County followed the Federal Register Notice guidance that describes how to complete an unmet needs assessment (including data sources, methodological processes, and how to specifically calculate unmet needs for each sector.)

The County’s current unmet needs across HUD’s defined sector categories (housing, infrastructure, and economic revitalization) are detailed below.

Table 4. Unmet Needs Summary

Category	Unmet Need	Percent of Total Unmet Need
Housing	\$200,337,185.00	33%
Infrastructure	\$250,042,387.32	41%
Economic	\$157,222,089.00	26%
Total	\$607,601,661.32	100%

Lee County proposes CDBG-DR allocations to address the identified unmet needs. (Table 5) While Housing needs were only quantified as 33% of the total unmet needs, Lee County anticipates available data related to the needs of property owners is not reflective of the total population that experienced flood, wind damage, or other impacts from Hurricane Helene or Hurricane Milton. Local permitting data indicate that a total of 1,465 permits filed indicated damage from Hurricanes Helene and Milton, with estimated cost of repairs totaling \$44,961,285.05. This figure was not included in the unmet needs assessment, as the amount of insurance or other funds available to pay for these damages is unknown at this time. For this reason, Lee County is allocating approximately 43% of the total CDBG-DR allocation to address unmet housing needs.

Table 5. Unmet Needs and Proposed Allocations

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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	\$5,034,150	5%			
Housing	\$43,013,400	43%	0%	100%	43%
Infrastructure	\$37,533,000	37%	100%	100%	12%
Public Services	\$15,102,450	15%	0%	100%	15%
% of Total	\$100,683,000	100%	100%	100%¹²	70%¹³

¹² Grantees are required to spend a minimum of 80% of their funds in the HUD identified MID areas.

¹³ Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.

II. UNMET NEEDS ASSESSMENT

Unmet needs are calculated for each of the HUD defined sectors (housing, infrastructure, and economic revitalization) based on guidance provided by HUD in its Allocation Announcement Notification effective on January 21, 2025, and Universal Notice effective on January 13, 2025 ([“herein after referred to as “applicable notices”](#)). The County followed the Federal Register Notice guidance that describes how to complete an unmet needs assessment (including data sources, methodological processes, and how to specifically calculate unmet needs for each sector).

HUD defines “unmet needs” as resources necessary to recover from a disaster that are not likely to be addressed by other sources of funds. This accounts for the various forms of assistance available to, or likely to be available to, affected communities (e.g., FEMA PA funds) and individuals (e.g., estimated homeowner’s insurance) and uses the most recent available data to estimate the portion of need unlikely to be addressed by insurance proceeds, other Federal assistance, or any other funding sources. Any remaining need, after accounting for all support, represents the overall unmet need. The results of the unmet needs assessment are used to determine a baseline of unmet needs by category and then used as the basis for the creation of recovery programs. Needs related to housing, infrastructure, and economic revitalization are detailed in the following sections:

Due to the recency of Hurricanes Helene and Milton, various data sources are not yet available (including complete data sets for FEMA Public Assistance). Lee County completed the needs assessment using best available data as of January 2025. Unmet needs assessment data will be updated throughout the duration of the CDBG-DR program and will be incorporated into this Action Plan as appropriate via a substantial amendment.

A. SUMMARY OF UNMET NEEDS BY CATEGORY

Housing

To calculate the Housing unmet needs, Lee County used FEMA IA, National Flood Insurance Program (NFIP), and local data to identify damaged or destroyed units, calculate the value of housing losses, and tabulate against the assistance received. An increase of 30 percent¹⁴ of estimated value of housing losses in Lee County was included to account for costs associated with making newly constructed and rehabilitated housing more resilient to future disasters. Additional

¹⁴ The 30 percent resilience investment is consistent with the approach that HUD took in 2013 when it allocated CDBG-DR funding to jurisdictions impacted by Superstorm Sandy. See the allocation methodology in HUD’s Federal Register Notice issued November 18, 2013 (78 FR 69112).

information regarding the methodology utilized to determine the housing unmet needs can be found in section *II.A.1. Housing Unmet Needs*.

Infrastructure

Infrastructure impacts are estimated from the non-federal cost share of FEMA PA and HMGP projects, FHWA, and non-match projects submitted to Lee County. An increase of 30 percent¹⁵ of the total of all Lee County PA project costs was included to account for costs associated with making repaired and newly constructed infrastructure more resilient to future disasters. An additional 20 percent¹⁶ Producer Price Index increase for building materials and supplies was incorporated to account for anticipated increases in the cost of building materials. Additional information regarding the methodology utilized to determine the infrastructure unmet needs can be found in section *II.A.2. Infrastructure Unmet Needs*.

Economic Revitalization

To calculate the economic revitalization unmet needs, Lee County used summarized SBA data using Total Verified Loss (estimate) for a subset of operational categories and accounted for an additional 30 percent in funding needed to support rebuilding to higher standards (resilience) and removed payments that had been made. Additional information regarding the methodology utilized to determine the Economic Revitalization Unmet Needs can be found in section *II.A.3. Economic Revitalization Unmet Needs*.

The total unmet needs in each category (Table 6) are estimated based on best available data as of January 2025. The unmet needs assessment will continue to be updated as programs progress and additional data become available. In total, Lee County estimates more than \$607million in unmet needs from damages caused by Hurricane Helene and Hurricane Milton.

Unmet needs are calculated based on direct and indirect needs, minus all financial assistance that have been budgeted or obligated to meet those needs. Table 6 below indicates the total unmet need in each of the HUD specified categories. Rental housing damages and FEMA IA claims for Hurricane Helene and Hurricane Milton were not available as of January 2025. Unmet needs for rental housing were estimated using data from Hurricane Ian housing rehabilitation, reconstruction and elevation programs, which indicated that approximately 1.5% of all awarded applicants were owners of rental properties.

¹⁵ The 30 percent resilience investment is consistent with the approach that HUD took in 2013 when it allocated CDBG-DR funding to jurisdictions impacted by Superstorm Sandy. See the allocation methodology in HUD's Federal Register Notice issued November 18, 2013 (78 FR 69112).

¹⁶ Producer Price Index by Industry: Building Material and Supplies Dealers, April 2023, <https://fred.stlouisfed.org/series/PCU44414441>

Allocations for HMGP and FHWA were not available for Hurricane Helene or Hurricane Milton as of January 2025. The estimated need for infrastructure includes available FEMA PA data and unmet mitigation needs identified through the local mitigation strategy.

Table 6. Quantified Disaster Impacts and Exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Rental Housing	\$3,005,057.78	\$0	\$3,005,057.78
Owner-Occupied Housing	\$197,332,127.22	\$0	\$197,332,127.22
Infrastructure	\$244,885,651.71	\$14,186,528.79	\$250,042,387.32*
Economic Development	\$162,545,400	\$5,323,311	\$157,222,089
Total	\$607,768,236.71	\$19,509,839.79	\$607,601,661.32

*Unmet needs include 20% estimated increase for the cost of supplies and building materials, and a 30% increase to add resiliency measures in the rehabilitation or reconstruction of damaged facilities. Multipliers were only added to needs identified in FEMA PA data. See Infrastructure unmet needs section for additional information.

A single data source does not provide sufficiently accurate information, so multiple sources were used to understand the full extent of needs in Lee County following Hurricanes Helene and Milton. Data in this assessment reflect the best available data as of January 2025 to capture the needs at that point in time.

- FEMA Individual Assistance (IA):** The FEMA IA Program is the primary source of data on impacted households and for calculating unmet housing recovery needs for CDBG-DR grantees. Following a disaster, homeowners and renters voluntarily register for FEMA IA. FEMA Verified Loss¹⁷ awards only aid with repair/replacement to restore the home to habitable conditions. FEMA IA data only reflects the cost to repair a home to habitable conditions and often underestimates need. However, the data available at the household level, including a range of income and real property damage estimates, allows for an

¹⁷ <https://www.fema.gov/press-release/20230425/understanding-fema-verified-loss-0>

analysis consistent with the unmet needs calculation outlined in the applicable federal register notice.

- **Small Business Administration (SBA):** The SBA disaster loan program is a recovery resource available to impacted households. The program provides loans for housing repairs and is primarily accessed by homeowners. SBA loan estimates are based on inspections, and often include the full cost to restore a home.
- **Insurance Claims:** Lee County has requested household level insurance claim information for homeowner's insurance and National Flood Insurance Program (NFIP). Summarized NFIP claim data at the county level was available and has been used to estimate the average claim per household. The County requested insurance data made available by the Florida Office of Insurance Regulation (FOIR) for Lee County. However, FOIR didn't provide incurred losses.
- **American Community Survey:** The American Community Survey (ACS) is updated annually and is based on a sample of 3.5 million residents in the 50 states. ACS data was used to capture socioeconomic and demographic data. The ACS asks more comprehensive questions than the ten-year census with the goal of "providing current information to communities every year...for programs, economic development, emergency management, and understanding local issues and conditions."¹⁸
- **HUD & Homelessness Data Exchange (HDX) Homeless Point-in-Time Count:** The Point-in-Time (PIT) Count is an annual count conducted by every Homeless Continuum of Care (CoC) in the County on one designated night in January. It accounts for the number of individuals housed in emergency shelters, transitional housing, Safe Havens, and those who are unsheltered. As the data only includes individuals sleeping outside and in shelters, it does not capture those experiencing homelessness who are sleeping in motels or staying with friends or relatives temporarily.¹⁹
- **HUD Low- and Moderate-Income Data (LMI):** This data is available on the HUD Exchange at the block group, tract, jurisdiction, and county levels. The HUD limits calculate the very

¹⁸

<https://www.census.gov/programs-surveys/acs/about/acs-and-census.html#:~:text=The%20American%20Community%20Survey,-Conducted%20every%20month&text=Provides%20current%20information%20to%20communities,understanding%20local%20issues%20and%20conditions>

¹⁹ Agans, Robert P., Jefferson, Malcolm T., Bowling, James M., Zeng, Donglin, Yang, Jenny and Silverbush, Mark. "Enumerating the Hidden Homeless: Strategies to Estimate the Homeless Gone Missing From a Point-in-Time Count" Journal of Official Statistics, vol.30, no.2, 2014, pp.215-229. <https://doi.org/10.2478/jos-2014-0014>

low (50 percent of area median income) income limit, extremely low income, and low (80 percent of area median income)²⁰ income limit for 1 person to 8 person families for every county and state in the United States. The limits are recalculated annually to determine eligibility for public housing, Section 8 vouchers, and disabilities and elderly programs.

- **Public Housing Damage:** Lee County requested damage and unmet needs information from the Housing Authority of the City of Fort Myers and Lee County Housing Authority. Other owners of HUD assisted housing units were contacted via email, but Lee County received limited responses with damage levels or unmet needs information.

Table 7. DATA SOURCES

Data	Source
Hurricane Impacts and Weather Data	National Oceanic and Atmospheric Administration (NOAA), National Weather Service (NWS)
Presidential Disaster Declaration Areas	FEMA
Most Impacted and Distressed Area	HUD
Housing Impact Data	FEMA Individual Assistance, Small Business Administration (SBA), National Flood Insurance Program (NFIP), Lee County Housing Authority, Housing Authority of the City of Fort Myers, Lee County Property Appraiser
Infrastructure Data	Florida Division of Emergency Management (FDEM), FEMA Public Assistance (PA), FEMA Hazard Mitigation Grant Program (HMGP), Federal Highway Administration (FHWA)
Socioeconomic and Demographic Data	U.S. Census Bureau (Decennial Census and American Community Survey)
Low- and Moderate-Income Data	HUD
Homelessness, Unsheltered Populations Data	Lee County Homeless Continuum of Care, HUD Exchange Point-in-Time Counts
Mitigation Data	Lee County's Hazard Identification and Risk Assessment (HIRA) & Joint Local Mitigation Strategy (LMS) Plan (Lee County Public Safety), NOAA, United States Geological Survey (USGS), FEMA, NWS

²⁰ For purposes of the CDBG program, low- and moderate-income is defined as total household income at or below 80% of Area Median Income (AMI) as defined by HUD. AMI is calculated yearly at the state level with each county and for certain metropolitan areas having defined income limits.

1. Housing

The 2020 Census profile for Lee County indicates an overall population of 760,822 individuals.²¹ Current U.S. Census Bureau data²² estimates an overall population of 834,573 individuals for 2023. The median household income is approximately \$73,099 and approximately 53.1 percent of the population is employed. There are approximately 22,176 businesses in the County and 452,080 housing units.

The Lee County Consolidated Plan for HUD entitlement funds was completed in 2024. During the completion of this plan, Lee County identified three dominant gaps within the community: behavioral health, housing, and transportation.

The unmet needs analysis identified a total housing unmet recovery need of **\$200,337,185**. Lee County will implement single family housing repair, reconstruction, and elevation to address the unmet housing need utilizing \$43,013,400 (approximately 43%) of the allocated CDBG-DR funds from HUD. Approximately 215 households may be assisted through this project.

a) Emergency Shelters, Interim, and Permanent Housing

The Lee County Homeless Continuum of Care (CoC), including local municipalities, social service providers, and other stakeholders, is tasked with addressing the needs of persons experiencing homelessness. The CoC receives funding from HUD for several homeless assistance programs and is responsible for planning, coordinating, and monitoring the delivery of services to the homeless. The Lee County Homeless Coalition provides information on the needs, characteristics, number, and location of homeless persons in Lee County.

The CoC lead agency is Lee County's department of Human and Veteran Services. The lead agency is responsible for the completion of the annual point in time count, operation of the Homeless Management Information System, and the Coordinated Entry system, which prioritizes individuals experiencing homelessness for assistance. During the creation of this plan, Lee County gathered information from the CoC lead agency regarding impacts from Hurricanes Helene and Milton. The CoC indicated that service agencies did not experience temporary or long-term closures; however there is a lingering need for emergency shelter for persons experiencing homelessness. The former shelter was closed permanently due to impacts from Hurricane Ian.

²¹ <https://www.census.gov/quickfacts/leecountyflorida>

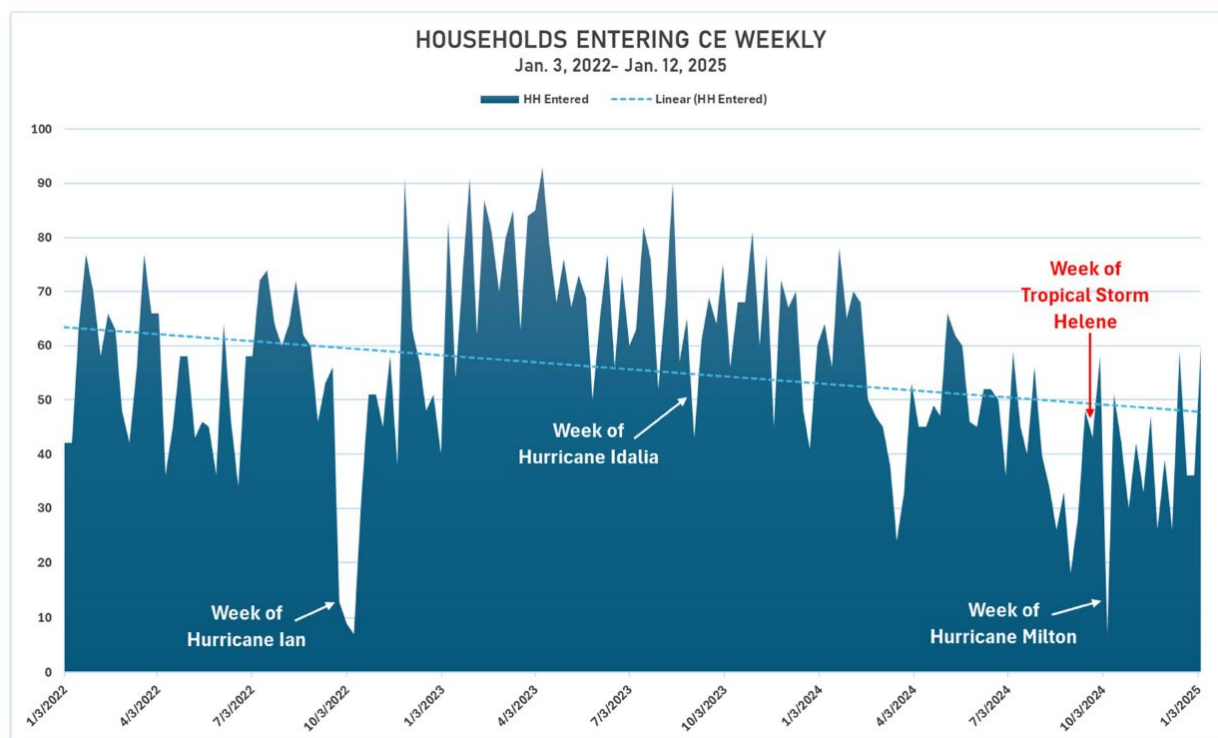
²² <https://www.census.gov/quickfacts/fact/table/leecountyflorida,US/PST045222>

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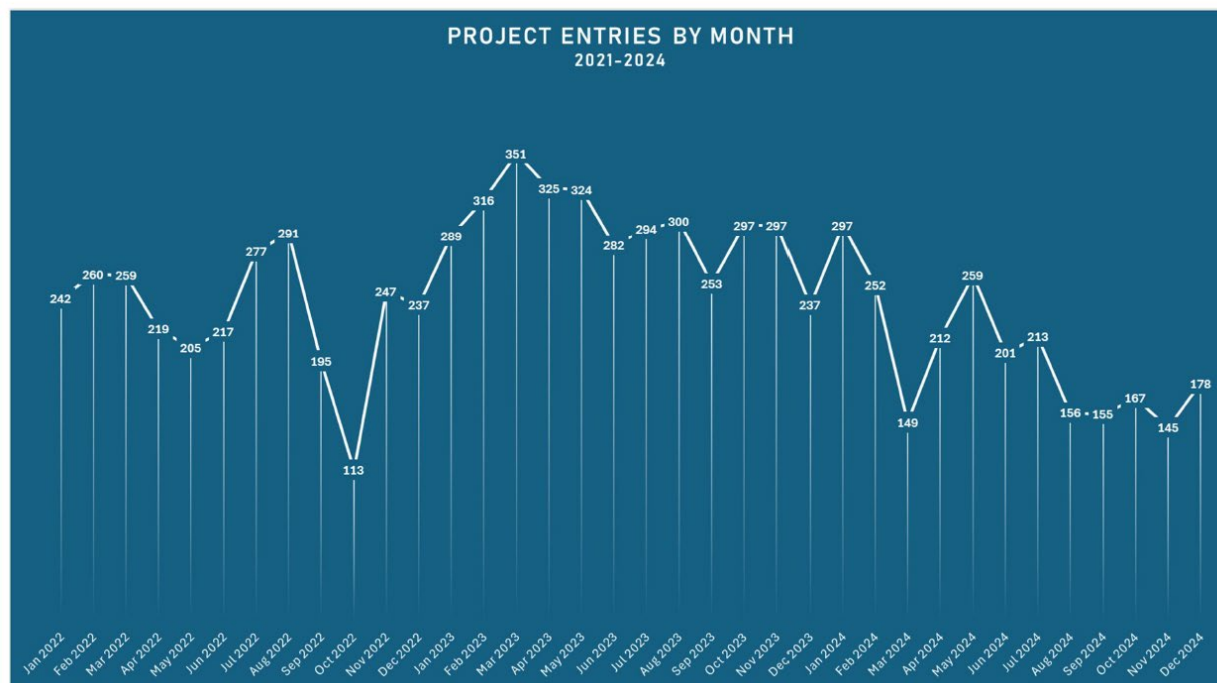
An analysis of call volume into Lee County’s Coordinated Entry line indicates steady call volume following Hurricanes Helene and Milton. (Figure 8). The Coordinated Entry (CE) line serves as a primary indicator of a disaster’s impact on the population experiencing homelessness.

Figure 8. Households Entering the Coordinated Entry System Weekly



Source: Lee County Homeless Management Information System

Figure 9. Coordinated Entry Case Management by Month



Source: Lee County Homeless Management Information System

The Point in Time (PIT) Count is another key indicator of a storm's impact on the homeless population. The 2025 count has not yet been completed, but the 2024 PIT was conducted on January 24, 2024. Using a combination of survey information from homeless individuals and data from our Homeless Management Information System (HMIS), 941 individuals were counted as experiencing homelessness on that night. This represents a 9% increase from the 862 individuals reported in 2023. Increases by age group were generally proportionate to the overall rise in homelessness in 2024, except for the 35 to 44 age group, which saw a 5% increase year-over-year. In the January 2024 PIT, approximately 744 individuals were experiencing unsheltered homelessness, with only 197 being sheltered on the night of the count. Shelter capacity expansion in response to Hurricane Ian in October 2022 resulted in a higher shelter count in 2023 compared to 2024. Returning to normal capacity limits led to 67 fewer individuals being sheltered in 2024, accounting for 45% of the increase in unsheltered clients year-over-year.

b) Rental and Owner-Occupied Single Family and Multifamily Housing

In Lee County, a total of 49,000 households applied for FEMA Individual Assistance (IA) due to Hurricanes Milton and Helene. Out of these applicants, 27,184 homeowners reported damage to their properties, while 21,186 renters reported personal property damage. According to the

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FEMA IA database, 5,135 owner-occupied homes were inspected, with total damages amounting to \$37,149,988. Additionally, 4,194 renter-occupied homes were inspected, with damages totaling \$6,238,284.45.

Permitting data from the Department of Community Development indicates that a total of 1,465 permits filed indicated damage from Hurricanes Helene and Milton. The total estimated cost of repairs is \$44,961,285.05. The Table 8 below shows the number of permit requests per zip code:

Table 8. Permits by Zip Code

33901	33903	33905	33907	33908	33912	33913	33917	33919	33920	33921
12	142	112	34	212	20	11	77	48	6	110

33922	33924	33928	33931	33936	33955	33956	33966	33967	33971	33972
117	107	1	74	41	6	104	4	35	39	14

33973	33974	33976	33991	33993
9	20	29	6	75

Based on post-storm damage reports, 2,749 structures were identified as potentially being substantially damaged. To date, Lee County has confirmed 25 substantially damaged structures that are located in a special flood hazard area (SFHA).

The tables below summarize impact data from Hurricanes Milton and Helene for owner-occupied applicants with real property damage and renter applicants with personal property damage, as reported through the FEMA IA application portal.

Table 9. FEMA IA Owner-Occupied Applicants - Hurricanes Milton and Helene

# of Applicants	# of Properties with FEMA Verified Real Property Loss	# of Applicants who Received Assistance for Real Property Loss	Average FEMA Verified Loss
27,184	5,135	77	\$326,601

Table 10. FEMA IA Renter Occupied Applicants – Hurricanes Milton and Helene

# of Applicants	# of Properties Inspected with FEMA Verified Personal Property Loss	# of Applicants who Received Assistance for Personal Property Loss	Average FEMA Verified Loss
21,816	4,194	144	\$38,747

Table 11. FEMA IA Applicants by Residence Type – Hurricanes Milton and Helene

Residence Type	# of Applicants	# Owner Occupied	# Tenant Occupied	# Unknown	% Type
Apartment	7,326	10	7,313	3	14.6%
Assisted Living Facility	31	0	31	0	0.0%
Boat	75	54	20	1	0.2%
College Dorm	9	0	9	0	0.0%
Condo	1,876	1,131	745	0	3.8%
Correctional Facility	3	0	3	0	0.0%
House/Duplex	32,082	21,202	10,863	17	64.1%
Military Housing	11	0	11	0	0.0%
Mobile Home	3,672	2,774	894	4	7.3%
Other	3,438	1,822	1,613	3	6.9%
Townhouse	1,102	517	585	0	2.2%
Travel Trailer	442	285	157	0	0.9%
(Blank)	-	-	-	-	-
Grand Total	50,067	27,795	22,244	28	100%

The damage categories utilized by FEMA are described below as listed in the January 16, 2025 federal register notice.

FEMA Inspected Owner Units

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

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. Each of the FEMA-inspected renter units are categorized into one of five categories:

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage.
- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.

- **Major-High:** \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

Table 12. FEMA IA Real Property Damage Owner-Occupied Units

Units with Minor-Low Damage	Units with Minor-High Damage	Units with Major-Low Damage	Units with Major-High Damage	Units with Severe Damage
311	318	784	404	49

Table 13. FEMA IA Personal Property Damage Tenant-Occupied Units

Units with Minor-Low Damage	Units with Minor-High Damage	Units with Major-Low Damage	Units with Major-High Damage	Units with Severe Damage
810	128	7	0	0

Lee County also conducted a comparison of FEMA Individual Assistance data from Hurricane Ian to that from Hurricanes Helene and Milton. The ratio of applicants with FEMA damage inspections is approximately 16% of the number of inspections completed for Hurricane Ian.

Out of 50,067 total applicants across the two storms, only 9.8% have had their Individual Assistance claim verified/paid.

FEMA IA and NFIP were the primary data sources that Lee County used to determine housing unmet needs. In Tables 12 and 13 above, Lee County started by organizing FEMA IA applicants by the HUD-suggested damage categories (“Minor-Low”, “Minor-High”, “Major-High”, and “Severe”). The FEMA IA value of real property loss was used to estimate loss for all home types that were identified as having “Minor-Low”, “Minor-High”, and “Major-Low” damage. These FEMA IA damage estimates provide the best available information for non-substantially damaged properties.

The FEMA-assessed assistance for repairs typically ranges from \$15,000 to \$28,800 for damage classified as “Major-High” and “Severe”. It is commonly accepted that those amounts would be inadequate to cover the full cost of repairing homes in those categories.

Small Business Administration (SBA) loans are the basic form of federal disaster assistance for homeowners with good credit and income whose private property sustained damage that is not fully covered by FEMA or insurance. Homeowners whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA low-interest loan. Interest rates

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on these loans are negotiated between the borrower and the lender but are subject to SBA interest rate maximums.

As of the most recent SBA data update on January 23, 2025, the SBA has received 2,590 SBA home loan applications from property owners in Lee County and 199 have been approved (see Table 14). The average disbursement amount for SBA loans, as of January 23, 2025, was \$35,300 based on applicants that received a disbursement.

Table 14. Total Home Loans Approved by SBA.

County	# of Approved Loan Applications	Average Disbursement Amount
Lee County	199	\$35,300

Source: SBA to Lee County (updated on January 23, 2025)

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

Lee County has two public housing authorities (HA), the Housing Authority of the City of Fort Myers (HACFM) and Lee County Housing Authority (LCHA). During the development of this Action Plan, Lee County consulted with both public housing authorities to obtain information on the impacts and current recovery status of public housing facilities and housing voucher properties. As defined by HUD, a PHA includes any State, County, municipality, or other governmental entity, public body, agency, or instrumentality of these entities authorized to engage or assist in developing or operating low-income housing under the U.S. Housing Act of 1937.

The Housing Authority of the City of Fort Myers (HACFM) manages and operates 3 public housing facilities and several properties with project-based vouchers. The facilities include:

- Horizons – 170 Units
- Royal Palm Towers – 100 Units
- Renaissance Preserve Family – 392 Units
- East Point Phase I – 86 Project Based Rental Assistance / ACC
- East Point Phase II – 90 – LIHTC / 22 units have PBV subsidy
- Landings at East Point – 126 LIHTC Project Based Rental Assistance Contract
- Broadway – 40 units Project Based Vouchers
- Covington Meadows – 16 – Project Based Vouchers
- Stella – 14 units Project Based Vouchers
- Coconut Cove – 12 Project Based Vouchers
- Swanson Loop – 60 units Project Based Vouchers

The Lee County Housing Authority manages and operates 3 public housing facilities containing a total of 142 housing units. The facilities include:

- Pine Echo I – 46 Units
- Pine Echo II – 46 Units



- Barrett Park – 50 Units

The Lee County Housing Authority reported minor damage from previous storms, including downed trees and damage to fences. A temporary roof repair on one of their properties also sustained damage, leading to leaks. Fortunately, none of the residential units were affected. The total cost for these repairs amounted to \$89,950 and no claims were filed with their insurance company or FEMA.

The Housing Authority of the City of Fort Myers indicated that all of damages were from Ian and worsened by intensive rain from the two other storms. HACFM was not able to make insurance claims on the latest storms due to replacement or repair activities currently underway from Hurricane Ian.

Lee County also consulted with Habitat for Humanity, a nonprofit organization, and they reported that the volume of home inspections has remained consistent along with mortgage payment assistance, but unfortunately, they lack the funding for this type of assistance.

The table below provides a summary of the number of damaged properties and amount of remaining unmet need.

Table 15. Housing Authority Damaged Properties

Housing Authority	Total # of Properties	Total # of Damaged Properties	# of Damaged Units	Remaining Unmet Need
Housing Authority of the City of Fort Myers	11	0	0	None
Lee County Housing Authority	3	2	92	\$89,950

This analysis demonstrates limited unmet needs for public housing authorities.

Based on the analysis of data from FEMA IA, NFIP Claims, and other local information, the total Housing unmet needs are estimated to total \$154,105,527. To obtain the true cost of housing replacement, given increase cost of code compliance and resiliency measures to make building more resilient to future disasters, an additional 30%²³ has been added to the total housing loss.

To get a more accurate estimate of housing losses in Lee County, parcel data was collected from the Lee County Property Appraiser to determine the average values of buildings (no land included in the value) for a single-family home, condo/apartment, and mobile home units. The following

²³ [FR-5696-N-06](#), page 69113

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average building values were calculated for each home type using 2024 Lee County Property Appraiser data²⁴:

Table 16. Property Appraiser Data – Average Building Values in Lee County by Building/Unit Type

Unit Type	Average Building Value (AVB)	50% of ABV	75% of ABV
Single Family Home	\$291,071.90	\$145,535.95	\$218,303.93
Condo	\$315,301.07	\$157,650.54	\$236,475.80
Mobile Home	\$71,601.09	\$35,800.55	\$53,700.82

For “Major-Low” damaged units, the County is assuming the properties are not substantially damaged and do not need substantial rehabilitation; for owner-occupied units, the FEMA Real Property Damage maxes out at \$14,999 and is well under the average building value of \$291,071.90. Because the substantial damage threshold requires that damages exceed 50 percent of total building value, the County used that average by unit type to estimate the property loss per unit for “Major-High” damaged units. For “Severe” damaged properties, the County assumes that these properties were substantially damaged and need to be fully rebuilt. The County estimated the full cost of replacement by using 75 percent of the 2024 Lee County Property Appraiser average building value by building type to estimate the property loss per unit for “Severe” damaged properties. For units that were in the “Major-High” and “Severe” categories but not a single family, condo/apartment, or mobile home; the FEMA IA damage number was used to estimate property loss due to the lack of building value data for those units.

Table 17. Estimated Total Loss

Data	Households / Units	Average Real Property Loss	Source of Average Real Property Loss	Estimated Total Loss
Minor-Low Damage to FEMA IA Applicants (All Home Types)	402	\$1,682.38	FEMA IA Value of Real Property Damage	\$676,316.80
Minor-High Damage to FEMA IA Applicants (All Home Types)	434	\$5,746.77	FEMA IA Value of Real Property Damage	\$2,494,098.18

²⁴ <https://www.leepa.org/>

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Data	Households / Units	Average Real Property Loss	Source of Average Real Property Loss	Estimated Total Loss
Major-Low Damage to FEMA IA Applicants (All Home Types)	1,295	\$10,648.21	FEMA IA Value of Real Property Damage	\$13,789,431.95
Major-High Damage to FEMA IA Applicants (Houses)	410	\$145,535.95	Lee County Appraiser 50% of Average Building Value	\$59,669,739.50
Major-High Damage to FEMA IA Applicants (Condos/Apartments)	1	\$157,650.54	Lee County Assessor 50% of Average Building Value	\$157,650.54
Major-High Damage to FEMA IA Applicants (MHUs)	189	\$35,800.55	Lee County Assessor 50% of Average Building Value	\$6,766,303.95
Major-High Damage to FEMA IA Applicants (All Other Types)	7	\$17,830.46	FEMA IA Value of Real Property Damage	\$124,813.22
Severe Damage to FEMA IA Applicants (Houses)	44	\$218,303.93	Lee County Assessor 75% of Average Building Value	\$9,605,372.92
Renter-Occupied Severe Damage to FEMA IA Applicants (Condos/Apartments)	0	\$236,475.80	Lee County Assessor 75% of Average Building Value	\$0
Severe Damage to FEMA IA Applicants (MHUs)	16	\$53,700.82	Lee County Assessor 75% of Average Building Value	\$859,213.12
Severe Damage to FEMA IA Applicants (All Other Types)	9	\$46,482.98	FEMA IA Value of Real Property Damage	\$418,346.82
FEMA IA Applicant Damage Subtotal	2,807	-	-	\$94,561,287.00



Data	Households / Units	Average Real Property Loss	Source of Average Real Property Loss	Estimated Total Loss
NFIP Identified Damages/Payments	804	\$74,060	NFIP Claims	\$59,544,240
Total Housing Loss	-	-	-	\$154,105,527
Total Housing Loss (including 30% resilience for rebuilding to higher standards)	-	-	-	\$200,337,185.10

Source: Data used in the chart above are from NFIP claims as of 01/16/25.

2. Infrastructure

Critical and public infrastructure damages from the 2024 storms were widespread and varied. Libraries, parks, beaches, sports venues, the Lee County Civic Center Complex, roadways, traffic signals, drainage and stormwater assets, and utilities were impacted. Wind-driven rain and minor structural damage affected a host of County buildings, and storm surge washed out roads, damaged drainage infrastructure, and interrupted water service on barrier islands. The landscape of critical and public infrastructure in Lee County was already drastically changed because of Hurricane Ian, and many facilities and projects were further impacted by the 2024 storms while still in recovery. The chronic nature of busy hurricane seasons in southwest Florida creates compounding unmet needs for critical and public infrastructure repairs and resiliency measures.

The following paragraphs describe the infrastructure unmet needs resulting from Hurricanes Helene and Milton. Specific references are made to infrastructure damage and challenges to recovery, with an emphasis on FEMA Public Assistance (PA) non-Federal cost share, FEMA Hazard Mitigation Grant Program (HMGP) non-Federal cost share, the Federal Highway Administration (FHWA) non-Federal Match, and non-match projects not covered by other grant sources.

For Hurricanes Helene and Milton, cost share percentages are as follows:

- **FEMA PA Non-Federal Cost Share:** The Federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share.
- **FEMA HMGP Non-Federal Cost Share:** The Federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share.
- **FHWA Non-Federal Match:** The Federal share of assistance is 80 percent of the eligible project cost, requiring the local government to contribute the remaining 20 percent in cost share.

The County has also identified unmet needs for non-match projects and intends to implement a range of eligible CDBG-DR projects, such as road repair, sidewalk repair, stormwater drainage improvements, and match for eligible FHWA and HMGP projects.

FEMA Public Assistance: Total Cost and Need

The catastrophic impact of Hurricane Ian across the County supports the need for a FEMA PA non-Federal cost share program. The County is in the process of documenting Hurricane Ian's

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severe damage to public facilities and infrastructure across the local municipalities. Tables 18 and 19 break down the FEMA PA sites and costs distributed by PA Category within the County by storm. Combined, a total of 193 sites were damaged, costing an estimated \$25.8 million and requiring an estimated non-federal cost share of \$6.4 million. “Category G Other” has the highest estimated cost at \$1,553,425 and 89 damaged sites, followed by Category E – Public Buildings and Equipment, with 78 damaged sites and an estimated cost of \$730,211. Table 20 includes FEMA PA estimates from four of Lee County’s six municipalities, which total an additional \$25 million in total cost for damages.

Lee County anticipates that some of the specific needs included in public assistance pose a serious and immediate threat to the health and welfare of the community.

Table 18. Hurricane Helene FEMA Public Assistance (PA) – Lee County

PA Category	Estimated Number of Damaged Sites (#)	Estimated Total Cost (\$)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
A – Debris*	1	\$2,000,000.00	\$1,500,000.00	\$500,000.00
B – Emergency Measures*	1	\$1,128,183.31	\$846,137.48	\$282,045.83
C – Roads and Bridges				
D – Water Control Facilities				
E – Public Buildings and Equipment	12	\$1,119,553.16	\$839,664.87	\$279,888.29
F – Utilities				
G – Other	26	\$471,050.00	\$353,287.50	\$117,762.50
Total	40	\$4,718,786.47	\$3,539,089.85	\$1,179,696.62

*CDBG-DR funds are generally not used for damage identified in categories A and B.

Table 19. Hurricane Milton FEMA Public Assistance (PA) – Lee County

PA Category	Estimated Number of Damaged Sites (#)	Estimated Total Cost (\$)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
A – Debris*	1	\$8,200,000.00	\$6,150,000.00	\$2,050,000.00
B – Emergency Measures*	1	\$4,726,664.10	\$3,544,998.08	\$1,181,666.03
C – Roads and Bridges	21	\$675,747.00	\$506,810.25	\$168,936.75
D – Water Control Facilities				
E – Public Buildings and Equipment	66	\$1,801,293.60	\$1,350,970.20	\$450,323.40

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PA Category	Estimated Number of Damaged Sites (#)	Estimated Total Cost (\$)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
F – Utilities	1	\$10,069.26	\$7,551.95	\$2,517.32
G – Other	63	\$5,742,651.69	\$4,306,988.77	\$1,435,662.92
Total	153	\$21,156,425.65	\$15,867,319.24	\$5,289,106.41

Source: Lee County FEMA Public Assistance Financial Records

**CDBG-DR funds are generally not used for damage identified in categories A and B.
NOTE: FEMA Public Assistance figures in Table 18 and Table 19 include only unincorporated Lee County. Detailed public assistance and unmet needs information will be updated following consultation with municipalities.*

Table 20. Initial Estimates from Municipalities for FEMA PA for Hurricanes Helene and Milton

PA Category	City of Fort Myers City of Sanibel Fort Myers Beach Village of Estero Estimated Total Cost (\$)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
A – Debris*	\$14,028,928.20	\$10,521,696.15	\$3,507,232.05
B – Emergency Measures*	\$2,650,638.52	\$1,987,978.89	\$662,659.63
C – Roads and Bridges	\$95,000.00	\$71,250.00	\$23,750.00
D – Water Control Facilities	\$565,500.00	\$424,125.00	\$141,375.00
E – Public Buildings and Equipment	\$4,907,628.00	\$3,680,721.00	\$1,226,907.00
F – Utilities	\$129,264.00	\$96,948.00	\$32,316.00
G – Other	\$3,397,615.00	\$2,548,211.25	\$849,403.75
Total	\$25,774,573.72	\$19,330,930.29	\$6,443,643.43

NOTE: FEMA Public Assistance in the table above does reflect estimates from: City of Fort Myers, City of Sanibel, Town Myers Beach and Village of Estero.

**CDBG-DR funds are generally not used for damage identified in categories A and B.*

Lee County: Total Cost and Need

Transportation Unmet Needs

Sidewalks across the County were damaged by Hurricane Ian and this problem was exacerbated by the 2024 storm season. Storm surge and debris removal operations from both Hurricanes Helene and Milton damaged sidewalks and their associated stormwater drainage system. Repairs and improvements for these sidewalks throughout the County are not eligible for FEMA Public Assistance because they are under the jurisdiction of Federal Highway Administration (FHWA). Lee County pursued an application through FHWA for repair work on roadways and sidewalks under FHWA, but the sidewalk portion of the application was not approved for funding. The estimated cost to repair all damaged sidewalks and related drainage is \$4,700,000.

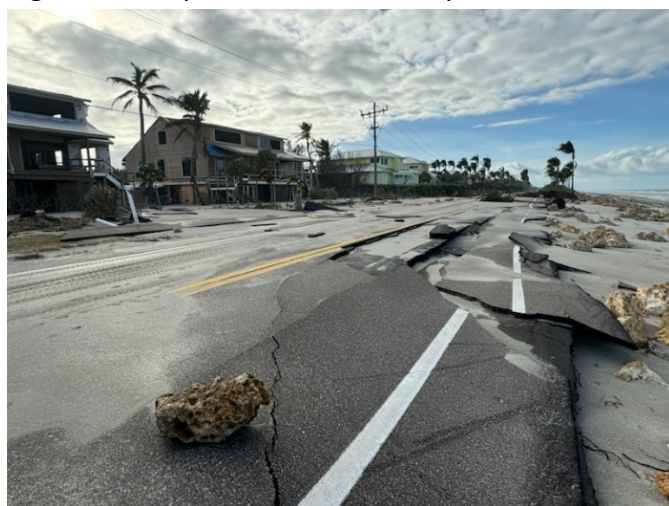
Roadways on Sanibel and Captiva Islands sustained significant, widespread damage as a direct result of Hurricane Milton. The storm surge brought sand and salt water onto the roadways caused large washouts and weakened the pavement (Figures 10 and 11). Captiva Road damage severed public access to Captiva Island from October 5, 2024, through October 18, 2024, following Hurricane Milton. Temporary repairs were conducted to restore accessibility for essential traffic.

Extensive permanent repairs to Captiva Road are still needed, including installation of sheet piling and other hardening efforts to ensure resiliency in future storms. The estimated cost for these repairs is \$3,250,000.

Figure 10. Captiva Island Roadway



Figure 11. Captiva Island Roadway



Picture Source: <https://www.captivafire.com/hurricane-milton-aftermath-update-3>

Infrastructure damages also occurred in Matlacha and Pine Island following Hurricanes Helene and Milton. Hurricane Milton spawned an EF1 tornado over the Matlacha area, causing wind damage and washouts along Pine Island Rd. The roadway between the Little Pine Island Pass Bridge and Matlacha Pass was still undergoing repairs when Hurricane Helene and Milton brought significant storm surge to the same area.

Figure 12. Map of Pine Island Rd Between Matlacha Pass and Little Pine Island Pass Bridges



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The saltwater intrusion further compromised this section of road and softened the base material. Essential repairs to this section of roadway are estimated to cost **\$1,500,000**. (*Figure 13 – Damage from Helene and Milton; Figure 14 -Damage from Hurricane Ian*).

Figure 13. Hurricane damage



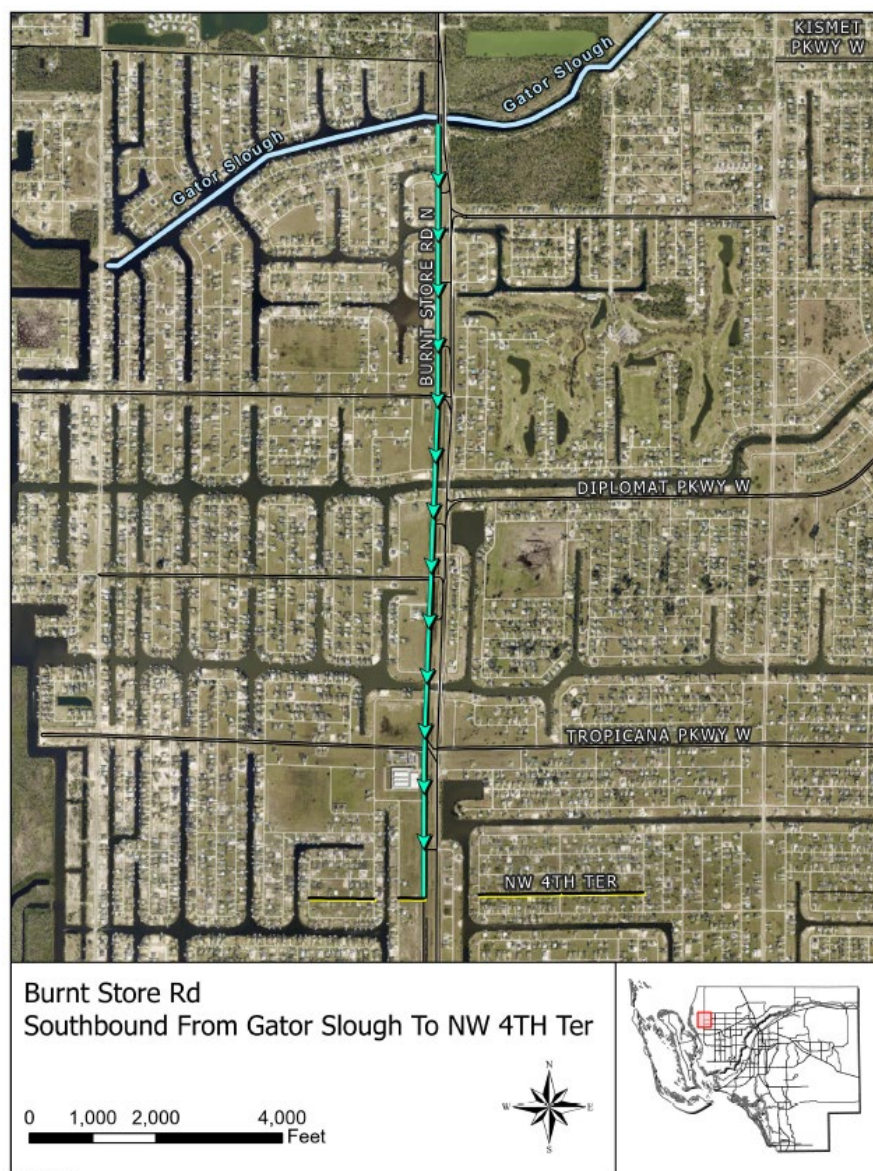
Figure 14. Hurricane damage



Additional storm surge impacts from Hurricane Ian and the 2024 storms were experienced in sections along Burnt Store Road from south of Gator Slough to NW 4th Terrace. Significant rainfall from Hurricane Ian softened the base rock below Burnt Store Road causing damage to the pavement. Hurricanes Helene and Milton brought additional rainfall and flooding to the area

further damaging the base rock and creating the need to complete resurfacing of the road. The estimated cost to make these repairs is **\$2,500,000**.

Figure 15. Map of Burnt Store Rd from Gator Slough to NW 4th Ter

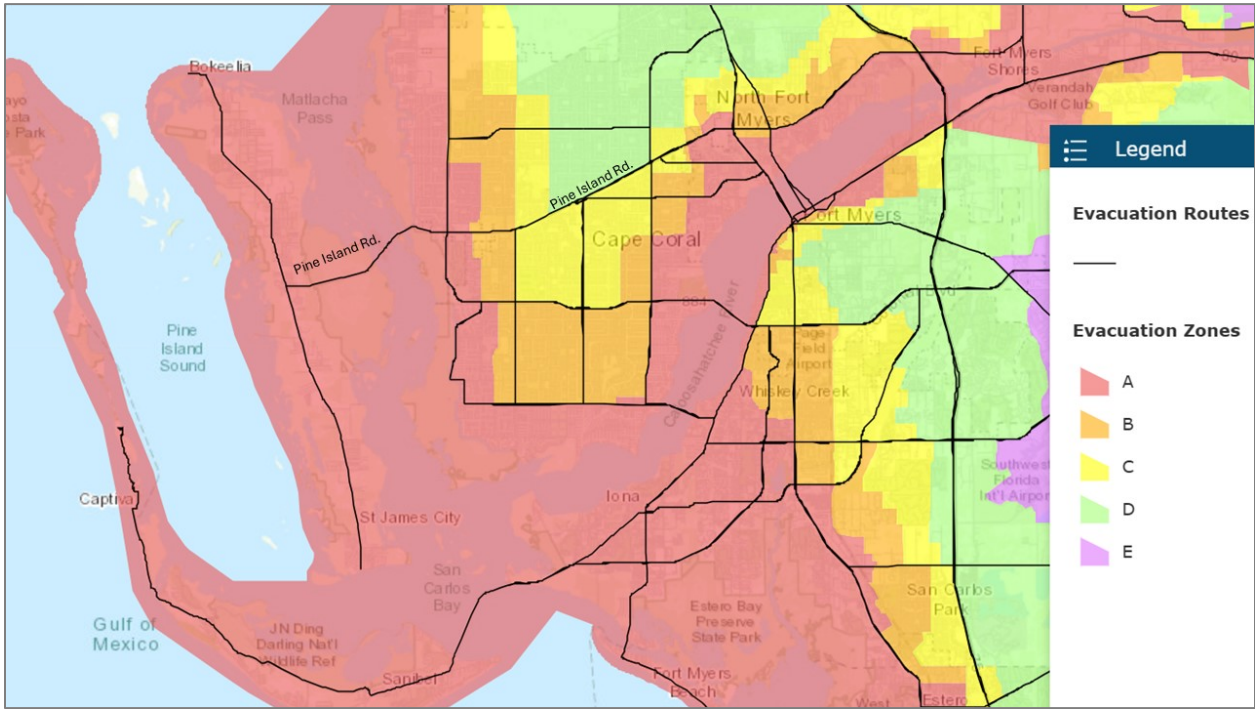


Florida Department of Transportation hurricane restoration plans include resurfacing of the section of Pine Island Road at the Little Pine Island Bridge and the washed-out area adjacent to the Matlacha Draw Bridge. Lee County will be responsible for making necessary repairs to the portion of the road through Matlacha. Pine Island Road serves as a critical hurricane evacuation route. During Hurricane Milton, Lee County issued mandatory evacuation orders for Evacuation Zones A and B. Pine Island Road is the only evacuation route off Pine Island and Matlacha and serves as one of the primary connectors from Cape Coral to Interstate 75. (Figure 16).



Resurfacing sections of Pine Island Road will provide a consistent, newly restored pavement condition, and prevent disruption in evacuation from this barrier island.

Figure 16. Lee County Evacuation Routes



Due to the significant impacts to roadways throughout Lee County, it is anticipated that the County and municipalities will pursue assistance from the Federal Highway Administration (FHWA) to make necessary permanent repairs. FHWA funds typically require a 20% match with local funds. In accordance with the Universal Notice and the Housing and Community Development Act, CDBG-DR funds may be used to satisfy a match requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG-DR activity (e.g., programs or activities administered by FEMA, USACE, United States Department of Agriculture (USDA), and the Federal Highway Administration (FHWA).

As established by HUD in 2013 under the allocation for Hurricane Sandy (78 FR 69104), the County has calculated a 30 percent increase which is used to incorporate resiliency components. This resiliency add-on has been used by grantees in their unmet needs assessments to estimate the increased cost of compliance since 2013, and the County finds that this remains a reasonable broad estimate. Using this figure, the County has identified \$7,565,640.91 in unmet need for resiliency compliance as noted in Table 20.

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According to the Federal Reserve Economic Data Producer Price Index by Industry: Building Material and Supplies Dealers²⁵, there has been a consistent cost increase in building materials in recent years. The County compared the price index from December 2020 to November 2024 and notes an approximate 20 percent Producer Price Index increase for building materials and supplies dealers. The County has included 20 percent to reflect the increase in materials and supply costs that is anticipated for implementation of these projects.

Table 21. Unmet Needs by Project

Project	Preliminary Unmet Need	Resiliency (+30%)	Building/ Materials (+20%)	Total Estimated Unmet Need
FEMA PA Unmet Need (Non-Federal Cost Share) – Helene – Unincorporated Lee County (FEMA Categories C-G)	\$397,650.79	\$119,295.24	\$79,530.16	\$596,476.19
FEMA PA Unmet Need (Non-Federal Cost Share) – Milton – Unincorporated Lee County (FEMA Categories C-G)	\$2,057,440.39	\$617,232.12	\$411,488.08	\$3,086,160.59
DOT Roads	\$7,250,000.00	\$2,175,000.00	\$1,450,000.00	\$10,875,000.00
Sidewalks	\$5,000,000.00	\$1,500,000.00	\$1,000,000.00	\$7,500,000.00
Municipality Public Assistance (FEMA Categories C-G)*	\$2,273,751.75	\$682,125.53	\$454,750.35	\$3,410,627.63
Totals	\$16,978,842.93	\$5,093,652.88	\$3,395,768.59	\$25,468,264.40

*Estimated needs from municipalities include: City of Fort Myers, City of Sanibel, Town Myers Beach and Village of Estero.

Note: CDBG-DR funds are generally not used for damage identified in categories A and B so they were excluded from the unmet need.

Other Critical Infrastructure Unmet Needs

Lee County received allocations FEMA Hazard Mitigation Grant Program (HMGP) funding in the amount of \$7,262,310.39 for Hurricane Helene and \$28,761,078.55 for Hurricane Milton. HMGP requires a 25% match for all awarded projects, leaving a total match obligation of \$12,007,796.31. Due to the significant costs of back-to-back disasters, Lee County and municipalities are anticipated to need assistance to meet the match requirements for these projects. The use of funds to fulfill match requirements for CDBG-DR eligible activities is authorized in accordance with the Universal Notice ([90 FR 1754](#)).

²⁵ Source: <https://fred.stlouisfed.org/series/PCU44414441>

3. Economic Revitalization

Through Lee County's consultation process, information was gathered regarding economic revitalization unmet needs. A summary is provided below, along with an analysis of Small Business Administration loans provided to the business community following Hurricanes Helene and Milton.

Following Hurricane Milton, Lee County's Economic Development Office established an online survey that encouraged business owners to report impacts from the storm. The office received 133 responses from impacted businesses indicating the following:

- 60% of business respondents were able to be open and operational.
- Majority of the remaining 40% would reopen within a month, with approximately 12 indicating that reopening would take between three months to a year.
- 33% of surveyed businesses experienced flooding and 42% stated they experienced damage, correlating with the businesses indicating they were not able to be immediately open.
- Most physical damage reported was under \$300,000, with one business reporting \$600,000-\$900,000 and one reporting \$2.7-\$3 million in physical damage
- Economic Impact was mostly under \$300,000, with six businesses reporting \$310,000 – \$600,000 and three reporting over \$600,000 – \$1.5 million
- Small business challenges include access to capital and replacement of equipment, as well as funding or staff for debris removal.

SBA Loan Information

Lee County has determined that the most impactful means by which to support overall economic recovery are included in its housing and infrastructure programs. However, the County will continue to evaluate information related to the unmet needs of the business community and collaborate with municipal partners and other stakeholders to assess the feasibility of CDBG-DR programs to support economic revitalization.

The Small Business Administration (SBA) makes low-cost disaster loans available to qualified businesses. According to SBA, 182 Business/EIDL Loans have been approved (Table 21).

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22. SBA Business and EIDL Loans Approved

County	Business/EIDL Loans
Lee County	182

Source: Small Business Administration Data for Lee County, Disaster 4828 (Helene) and 4834 (Milton), Date: January 23, 2025, SBA Loan Approved.

Utilizing all SBA business data rather than a sub-set to understand the financial impact to livelihoods provides additional understanding of impacts and recovery across the county. A summary of SBA applicants, Table 22 summarizes all applicants that had a verified loss by the operational categories business content loss and real estate loss, which totals \$410,222,187.

Table 23. Estimating Business Operating Losses.

Operational Category	County of Businesses with Verified Loss	Total Verified Loss
Business Content Loss	Lee County	\$202,857,148
Real Estate Loss	Lee County	\$207,365,039
TOTAL		\$410,222,187

Source: Small Business Administration Data for Lee County, Disasters 4828 and 4834, Date: January 23, 2025, All Application Status.

To help determine unmet economic revitalization needs, the analysis below was completed using data from SBA loan applications. Table 23 summarizes damage for real estate and contents losses. Each SBA application was classified into one of five categories based on this estimate of damage and categories defined by HUD. The table shows only approved and declined applications. The sum of verified losses to real estate, furniture, machinery, and inventory results in a total verified loss of \$125,034,923 (M). When accounting for resiliency requirements (30 percent increase) the total impact to businesses in Lee County is \$162,545,400 (N). SBA payouts to businesses totaled \$5,323,311 (P) for these lines of loss, leaving potential unmet needs of \$157,222,089 (Q).

Table 24. SBA Derived Impact and Unmet needs for businesses.

Row	Description	Count	Impact
A	SBA approved applicants with verified HUD Category 1 < \$12,000 Losses	1	\$12
B	SBA approved applicants with verified HUD Category 2 \$12,000 - \$29,999 Losses	1	\$25,648
C	SBA approved applicants with verified HUD Category 3 \$30,000 - \$64,999 Losses	9	\$429,315
D	SBA approved applicants with verified HUD Category 4 \$65,000 - \$149,999 Losses	28	\$2,909,464
E	SBA approved applicants with verified HUD Category 5 >= \$150,000 Losses	46	\$34,828,828
F	SBA approved applicants - No Category	97	\$0

Row	Description	Count	Impact
G	SBA declined applicants with verified HUD Category 1 < \$12,000 Losses	6	\$24,911
H	SBA declined applicants with verified HUD Category 2 \$12,000 - \$29,999 Losses	2	\$27,600
I	SBA declined applicants with verified HUD Category 3 \$30,000 - \$64,999 Losses	6	\$243,814
J	SBA declined applicants with verified HUD Category 4 \$65,000 - \$149,999 Losses	20	\$2,193,306
K	SBA declined applicants with verified HUD Category 5 >= \$150,000 Losses	55	\$84,352,025
L	SBA declined applicants - No Category	248	\$0
M	Total Verified Loss (estimate)		\$125,034,923
N	Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)		\$162,545,400
	Duplication of Benefits		
O	Total Amount Distributed by SBA on Approved Loans		\$5,323,311
P	Total Benefit		\$5,323,311
	Overall Business Unmet Needs		
Q	Total Verified Loss accounting for 30% resilience addition minus Total Benefit Amounts Distributed by SBA*		\$157,222,089

*Note: There are over 300 applications still in progress so this unmet needs is not final.

Source: Small Business Administration Data for Lee County, Disasters 4828 and 4834, Date: January 23, 2025., Application Status of Approved, Declined and in progress, Withdrawn and Canceled were removed; Operational Categories: verified loss to content and real estate. Duplication of benefits from "current" fields in SBA data.

4. Public Services

Disaster Relief Assistance

Lee County analyzed unmet needs related to disaster recovery by examining other needs assistance provided by FEMA. FEMA provided more than \$16 million in other needs assistance for survivors of Hurricanes Helene and Milton. The majority of assistance was provided for miscellaneous needs such as food, clothing, and other items necessary to ensure a complete recovery from the disasters. (Table 24 and Table 25)

Table 25. Helene Relief Assistance

Total Number of Applications	9,478
<i>Other Needs Assistance (ONA) Award Amount</i>	\$5,889,306.82
<i>Personal Property Award Amount</i>	\$1,516,000.17
<i>Moving/Storage Award Amount</i>	\$0.00
<i>Transportation Award Amount</i>	\$7,600.00
<i>Dental Award Amount</i>	\$0.00
<i>Funeral Award Amount</i>	\$0.00
<i>Medical Award Amount</i>	\$0.00
Total Other Needs Assistance (ONA) Award Amount	\$7,412,906.99

Source: FEMA Individual Assistance Data as of 1/14/2025

Table 26. Milton Relief Assistance

Total Number of Applications	40,809
<i>Other Needs Assistance (ONA) Award Amount</i>	\$7,302,689.31
<i>Personal Property Award Amount</i>	\$1,709,408.94
<i>Moving/Storage Award Amount</i>	\$0.00
<i>Transportation Award Amount</i>	\$8,343.98
<i>Dental Award Amount</i>	\$0.00
<i>Funeral Award Amount</i>	\$0.00
<i>Medical Award Amount</i>	\$0.00
Total Other Needs Assistance (ONA) Award Amount	\$9,020,442.23

Source: FEMA Individual Assistance Data as of 1/14/2025

While FEMA provided significant assistance, Lee County understands that there are ongoing financial needs for residents impacted by multiple back-to-back disasters. For this reason, Lee County intends to take a holistic approach to recovery by providing disaster relief assistance in coordination with housing rehabilitation, replacement, reconstruction, and reconstruction with elevation program to assist individuals in all aspects of their recovery.

Behavioral Health

Interviews and focus groups conducted as part of the 2019 Lee County Human Services Gaps Analysis²⁶ and consultations conducted for the completion of this plan identified the general area of behavioral health (mental health/substance abuse/co-occurring disorders) as a service need for both adults and children/youth.

The Resilient Lee plan designates expansion of behavioral facilities and services as a key priority, indicating that:

²⁶ <https://www.leegov.com/Documents/Human%20Services%20Gap%20Analysis%20DRAFT%202-11-20.pdf>

The County lacks a comprehensive system of care for behavioral health services. A 2020 Community Health Needs Assessment by the Florida Department of Health identified mental health as the top priority within Lee County and surrounding municipalities; the report recommends facility and service improvements to improve care options for residents. Residents of the County have access to only half of the number of mental health providers including psychiatrists, psychologists, clinical social workers, counselors, and other mental health providers who specialize in mental health care compared to the national average.

While not a universal outcome of mental health crisis, some patients with mental health illnesses do have increased contact with law enforcement. Law enforcement agencies are on the front lines of addressing mental health crises which adds to the responsibilities of those agencies, contributes to overcrowding of correctional facilities, and can contribute to adverse outcomes for patients who are not immediately connected to medical professionals. SalusCare, Inc. and Park Royal Hospital are the only two providers that can receive patients involuntarily admitted under the Baker Act in Lee County and its municipalities. Even with the Crisis Stabilization Units at SalusCare facilities, there are not enough adult nor pediatric beds to handle the demand of behavioral health services and needs of the County residents.

The community would benefit from an agency taking the lead to design and implement a coordinated service system for all behavioral health services within Lee County. Lee County has allocated funds from Hurricane Ian to plan for and implement some solutions to address the exacerbated demand for mental health services resulting from Hurricane Ian. However, the impact of subsequent and frequent storms, such as Hurricanes Helene and Milton, have further strained the mental wellbeing of Lee County residents. Immediately following Hurricane Milton, Lee County deployed community coordination teams on the barrier islands. During deployment these teams encountered countless individuals experiencing persistent concerns and challenges resulting from the loss of recurring storms. A robust behavioral health care system will help to address those challenges by providing residents the care they need to fully recover from recent storms, and tools to better prepare for future storms.

III. MITIGATION NEEDS ASSESSMENT

As detailed in both Lee County's Hurricane Ian CDBG-DR Action Plan Amendment 5 and Lee County's 'Resilient Lee' Recovery Task Force's Recovery and Resilience Plan, widespread devastation caused by Ian across Lee County's communities created significant challenges to recovery but also offered opportunities for mitigation and resilience for future disasters. These recovery challenges and mitigation opportunities were amplified when Hurricanes Helene and Milton passed through the County in 2024.

The State of Florida has been at the forefront of mitigation planning and the identification of resiliency opportunities for many years. Florida's Administrative Code, Chapter 27P-22 (Hazard Mitigation Grant Program – HMGP), requires the State as well as each County to develop mitigation planning documents to identify potential hazards, the risk of hazards, and projects to reduce risk to life and property. Florida's Enhanced State Hazard Mitigation Plan²⁷ (SHMP), which was updated in 2023 and is effective through August 22, 2028, and Lee County's 2022 Local Mitigation Strategy (LMS) plan, were used as foundational resources for this assessment.

The County most recently updated its *Hazard Identification and Risk Assessment (HIRA)*²⁸ in 2024 and identified tornadoes, epidemics/pandemics, tropical cyclones, floods, and severe weather events as priorities. Lee County's assessment concludes that funded projects should direct outcomes toward reducing costs resulting from the following major hazards:

- Tropical Cyclone and Storm Surge (to include tropical storms, tropical depressions, high winds, hurricanes, coastal flooding, and storm surge)
- Flood (to include riverine floods and flash floods)
- Tornado (to include tornadoes classified as EF0 or greater, dust devils, waterspouts, and funnel clouds)
- Wildfire

Lee County's top mitigation priorities are represented through the project proposal scoring matrix. Every project proposal receives a base score, a shelter score, and a community demand score. Higher prioritization goes to project proposals that:

1. Most align with existing community comprehensive plans, programs, and policies;
2. Comply with existing regulatory framework;
3. Are most likely to receive funding;
4. Contribute to a jurisdiction's Community Rating System (CRS) score;

²⁷ <https://www.floridadisaster.org/dem/mitigation/statemitigationstrategy/state-hazard-mitigation-plan/>

²⁸ <https://www.floridadisaster.org/dem/mitigation/statemitigationstrategy/state-hazard-mitigation-plan/>

5. Benefit the most communities;
6. Mitigate a high-risk hazard or addresses significant vulnerabilities;
7. Have minimal complexity;
8. Improve a critical service;
9. Have a shorter timeframe;
10. Improve shelters; and
11. Carry an increased community demand based on recent disasters.

Shelter projects generally score very high. Higher scoring non-shelter projects tend to specifically mitigate flood and/or wind hazards. This includes wind-retrofit, flood mitigation, elevation, and hardening solutions. The base and shelter scoring criteria are more resistant to change, while the community demand score reflects lessons learned from recent disasters regarding vulnerabilities and mitigation needs.²⁹

Mitigation / Resilient Programs (taken from Lee County's Recovery Task Force Recovery and Resilience Plan):

1. Strengthening the neighborhoods to be resilient to disaster conditions.

During and after Hurricanes Ian, Helene, and Milton, shelters provided respite for many families and individuals threatened by the storms. As the County experiences a variety of changes – from population shifts to increasingly severe storms shelter hardening and repairs are needed to increase the shelter space available to residents.

Lee County has taken steps towards expanding the sheltering strategy with its long-standing relationship with Hertz Arena. This strategy should be further developed to identify additional alternate sheltering options for the public.

2. Improving Evacuation Preparedness – the constant improvement, communication, and understanding of evacuation plans are critical parts of how regions prepare for disasters and protect the lives and safety of residents.

Prior to any hurricane making landfall, Lee County may issue evacuation orders in alignment with existing plans, policies, and procedures. Increasing transparency of plans and procedures during blue skies can help set public expectations and enhance communications with residents during future catastrophic events.

²⁹ Local Mitigation Strategy Project Ranking Worksheet and LMS Project Database

The intended outcome of increased evacuation planning and communication efforts would be that citizens have a thorough understanding of evacuation processes and are able to remain or get to safety, as directed, during an event.

3. Resilient Transportation – the need to rebuild and further safeguard transportation infrastructure damaged by Hurricanes Ian, Helene, and Milton comes as the County is also experiencing an increase in population and community stress related to traffic and commuting. This initiative seeks to advance projects that promote a regional transportation system that can withstand disaster shocks as well as accommodate a growing population by identifying key investments supporting social mobility options and reliable protected infrastructure.

Storm surge due to hurricanes can flood large areas of the County and will expose transportation infrastructure to saltwater, hampering mobility and endangering area residents.

The repair of storm damaged infrastructure creates an opportunity to rebuild a resilient transportation system that can withstand impacts due to coastal flooding, winds, and other hazards.

4. Hardening / Fortifying Critical Facilities, Systems, and Essential Services – the development of a regional approach to hardening both critical infrastructure (including facilities used) and key systems supports the provision of essential services to the community immediately following disasters. Local governments, communities, and businesses rely on these essential services to re-establish everyday life post-disaster. This program promotes region-wide identification and designation of essential community services, as well as the development of plans for infrastructure mitigation and systems resilience. This approach to hardening infrastructure and key systems is considered a best practice to maintain continuity of government and to bring enhanced support of emergency services following disasters.

Hurricanes Ian, Helene, and Milton disrupted emergency functions, first responder capabilities, and operational status of critical facilities; in addition to reducing the delivery of public services that allow for normal wellbeing and economic function. Infrastructure systems damaged by the hurricanes included energy systems, roadways, bridges, traffic controls, water and wastewater treatment systems, septic systems, cell towers, and voice and data services.

5. Rebuilding Resilient Communications Infrastructure - this initiative promotes rebuilding resilient communications infrastructure in Lee County by diversifying, hardening, protecting, and upgrading infrastructure to enable continued operations and address gaps in communication capabilities before, during, and after disasters using updated technology and connectivity advancements to increase resilience.

Communication services were disrupted throughout Lee County following Hurricanes Ian and Milton and are critical to future response and recovery efforts. Ian's and Milton's damages posed immediate challenges to first responder operations regarding life safety including the following:

- Communication Provider tower infrastructure was damaged compromising cellular capabilities. County-owned towers are hardened to withstand extreme weather conditions, but that is not always the case within the private sector.
- 911 systems were inundated with calls from Lee County municipalities and neighboring counties that experienced system failures and were diverted to Lee County systems.
- Damage assessments were delayed due to debris removal efforts needed to access communication infrastructure.

Implementing these strategies and tactics will help the County protect lives, enhance recovery progress, and mitigate overall disruptions to communications.

6. Augmenting Resilient Energy Infrastructure – prioritizing resilient energy infrastructure projects and employing new technologies and mechanics is vital to supporting safe and reliable restoration and production of power following disruption.

Resilient energy infrastructure supports the safe and reliable production of power for residents and businesses to use in their daily lives. Reliable power is also necessary for vital emergency service functions and life-safety operations.

Improving Potable Water Delivery – enhance the resilience of potable water infrastructure in Lee County to provide reliable and safe drinking water to the community in non-disaster times and during and after catastrophic events that meets the demand of a growing population. The outcome of pursuing these system upgrades is a potable water infrastructure system that remains resilient and capable of providing uninterrupted access to safe drinking water for communities, even in the aftermath of catastrophic events like Hurricanes Ian, Helene, and Milton.

7. Improving Resilient Wastewater Infrastructure – promote the fortification of sanitary sewer infrastructure and prevent disruptions and overflows, particularly during and after catastrophic events like Hurricanes Ian, Helene, and Milton.

Improving the operational capacity of wastewater systems is crucial to protecting people and the environment. The rehabilitation and construction of reclamation facilities, lift stations, and redundant connections between systems, and hardened and resilient wastewater infrastructure is a critical need in the region.

Table 27. CDBG-DR Infrastructure Mitigation Set-Aside Needs Assessment

CDBG-DR Infrastructure Mitigation Set-Aside Needs Assessment:	
Program Categories	Estimated Need
Harden/Fortify Critical Facilities, Systems, and Essential Services	\$128,085,600.00
Improve Potable Water Delivery	\$17,000,000.00
Resilient Communications Infrastructure	\$35,554,680.00
Resilient Energy Infrastructure	\$17,000,000.00
Resilient Transportation	\$9,650,000.00
Resilient Wastewater Infrastructure	\$14,680,000.00
Strengthen Emergency Shelter Network	\$4,000,000.00
Total	\$225,970,280.00

**A modified version of Lee County's LMS Project Proposals Data Sheet was analyzed to determine unfunded mitigation needs.*

Table 28. CDBG-DR Mitigation Set-Aside Needs Assessment

CDBG-DR Mitigation Set-Aside Needs Assessment:			
Categories Affected	A Total Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Infrastructure	\$225,970,280.00	\$0*	\$225,970,280.00
Total	\$225,970,280.00	\$0*	\$225,970,280.00

**HMGP and FHWA funding has not yet been allocated for Hurricane Helene or Hurricane Milton. All mitigation needs are currently unmet.*

IV. CONNECTION FOR PROPOSED PROGRAMS, PROJECTS AND NEEDS ASSESSMENTS

Lee County has allocated \$43,013,400 to support the rehabilitation, reconstruction and elevation of housing impacted by the 2024 disasters. This program will aid income qualified households to ensure they are residing in safe, sanitary and resilient housing.

As identified in the unmet needs assessment, programs to address infrastructure unmet needs are essential to further Lee County's recovery from the 2024 Disasters. Lee County will utilize \$24,400,000 in CDBG-DR funding to complete necessary repairs, reconstruction and improvements to critical infrastructure and public facilities.

The mitigation needs assessment indicates significant need for improvements to critical infrastructure and public facilities to prevent damages during future disasters. To address mitigation needs, Lee County will utilize \$13,133,000 in CDBG-DR funds to complete mitigating public facilities and infrastructure improvements. These improvements may include structural hardening to increase resiliency from high wind events and elevation to increase flood resiliency.

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, Lee County will coordinate with all subrecipients, implementation vendors, and Lee County departments to minimize displacement. Should any proposed projects or activities cause the displacement of people, the County has adopted a CDBG-DR specific Residential Anti-Displacement Relocation Assistance Plan (RARAP) policy to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

Lee County will plan and implement programs that minimize, whenever possible, the displacement of individuals and families. To lessen the adverse impacts of any displacement that may occur, Lee County will provide relocation activities as described in 24 CFR 42, 24 CFR 570.606, and 49 CFR 24.2(d)(1) through (6). Lee County will ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met through adoption of a separate RARAP for CDBG-DR purposes, to include applicable waivers and alternative requirements identified in the applicable notices.

The County has budgeted for temporary and permanent voluntary relocation activities within the Individual Housing, Rehabilitation, Reconstruction and Elevation Program described in this plan. The CDBG-DR specific RARAP will describe specific relocation activity budget caps for relocation activities for any CDBG-DR funded programs that displace either homeowners or tenants. Lee County plans to minimize displacement of persons or entities and assist persons or entities displaced because of implementation of a project utilizing CDBG-DR funds. Neither the CDBG-DR RARAP policies nor the provisions outlined in this plan are intended to limit the ability of the

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County or any subrecipients from conducting buyouts or acquisitions for destroyed or extensively damaged units or units in a floodplain.

Lee County does not anticipate engaging in projects that may result in involuntary participation. However some projects primarily those related to public facilities or infrastructure may require Lee County or subrecipients to obtain temporary or permanent easements for completion.

Lee County will consider the potential impacts on residents. If an identified project results in owner-occupants or tenants leaving their homes involuntarily (being displaced), the tenants may be eligible for Relocation Assistance under the URA. These requirements apply to the relocation of any displaced person as defined at 49 CFR § 24.2(a)(9). Displaced persons under this definition must be fully informed about their right and entitlement to relocation assistance and payments provided by the URA and its implementing regulations. Lee County and its subrecipients will adhere to all requirements in 49 CFR § 24.

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V. PROGRAM BUDGET

Table 29. Program Budget

Program	Project	Activity	Funding	National Objective
Housing	Housing Rehab, Reconstruction and Elevation	Rehabilitation, Reconstruction or Replacement of Owner Occupied Homes	\$43,013,400.00	Low/Mod Housing
Public Facilities/ Infrastructure	<u>Mitigation</u> Public Facility and Infrastructure	Critical infrastructure and public facility projects that do not have a tie-back to Hurricane Helene or Hurricane Milton (May include FHWA and HMGP Match)	\$13,133,000.00	Urgent Need
	Lee County Public Facility and Infrastructure	Critical Infrastructure and Public Facilities Projects that have a tie-back to Hurricane Helene or Hurricane Milton (May include Burnt Store & Pine Island Rd. Resurfacing, County-wide Sidewalks/Drainage, Captiva Drive Resiliency Improvements, Property Acquisition for Critical Infrastructure/Public Facilities)	\$24,400,000.00	Urgent Need Low/Mod Area
Public Services	Public Services	Implementation of behavioral health services and/or facilities identified through the Hurricane Ian Behavioral Health Plan and Disaster Relief Assistance	\$15,102,450.00	Limited Clientele
Admin	Admin	Administration and contingency funds	\$5,034,150.00	N/A
Total Allocation			\$100,683,000.00	



VI. FUNDING CRITERIA

Lee County will seek reimbursement for pre-agreement costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of Lee County’s Strategic Resources and Government Affairs team and the vendors providing technical support for the planning of the CDBG-DR programs. Other pre-agreement costs, which Lee County will fund with this grant, could include activity delivery and project costs associated with eligible disaster recovery programs identified within this Action Plan.

Lee County may request reimbursement for certain eligible pre-agreement costs necessary for the efficient and timely implementation of its recovery programs. These costs may include environmental review, damage assessment, creation of policies and procedures, and other costs necessary for determining eligibility of projects.

A. GENERAL EXCEPTION CRITERIA

The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the program policy, such as reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions which can be addressed through construction measures necessary to mitigate the consequences of those conditions. The County will establish policies and procedures for applicants to apply for an exception. All exceptions to maximum award limitations are subject to grant fund availability.

B. ADMINISTRATION

Table 30. Grantee Administration Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$5,043,150	5%
Total	\$5,043,150	5%

The County will utilize five percent of the total grant award for administration, as allowed by the Universal Notice. Funding has been allocated creating and managing the CDBG-DR recovery programs, including application intake, compliance monitoring, performance tracking, management of the Disaster Recovery Grant Reporting system, quarterly reports, and general administration.



C. HOUSING

1. Housing Programs Overview

Table 31. Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Housing Program One	\$43,013,400	45%
Total	\$43,013,400	45%

2. Grantee Housing Program

Program Title: LeeCares Housing Rehabilitation, Reconstruction and Elevation

Amount of CDBG-DR Funds Allocated to this Program: \$43,013,400

Eligible Activity(ies):

Housing activities eligible within this project may include the following:

- Rehabilitation of Single-Family Owner-Occupied Housing Units
- Reconstruction of Single-Family Owner-Occupied Housing Units
- Reconstruction with Elevation of Single-Family Owner-Occupied Housing Units
- Replacement of Owner-Occupied Mobile Home Units

Only properties damaged by Hurricane Helene or Hurricane Milton are considered for eligibility.

National Objective: Low/Moderate Housing

Lead Agency and Distribution Model: Lee County’s Office of Strategic Resources and Government Affairs is the lead and responsible entity for administering the LeeCares Housing Rehabilitation, Reconstruction and Elevation Program. Lee County has contracted with Horne LLP to provide implementation services to support the program. Lee County will accept applications from income qualified residents (80% AMI or less) whose homes were impacted by Hurricanes Helene and Milton.

Program Description: Based on the evaluation of FEMA IA data, Lee County has determined that housing rehabilitation, reconstruction and elevation is required to address unmet needs resulting from Hurricanes Helene and Milton. Lee County anticipates that approximately 320 households will seek assistance to make repairs, to reconstruct, or replace their homes. Lee County estimates a 33% attrition rate with these applications, leading to approximately 215 households that could ultimately be assisted by this program.

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Funds allocated for this project will provide for the rehabilitation, replacement, and reconstruction of single-family, owner-occupied housing that was damaged by Hurricane Helene or Hurricane Milton. All newly constructed, replaced or rehabilitated housing units must incorporate disaster resilience measures to provide better outcomes in a major storm. Activities funded under this program may include:

- Rehabilitating existing structures, including substantial rehabilitation to bring the property up to local codes and standards;
 - Making energy efficiency improvements through insulation, new windows and doors, and other similar improvements;
 - Installing handicapped accessibility aids, such as grab bars and ramps;
 - Repairing or replacing hurricane damaged roofs, windows, water systems, septic tanks, air conditioning, wells, windows, electrical, and plumbing systems;
- Demolishing and re-building a unit in substantially the same manner, including elevating homes which are substantially damaged in special flood hazard areas or which are designated as a repetitive loss property and Replacement of mobile homes.

Eligible Geographic Areas: Lee County, FL

Other Eligibility Criteria:

Eligibility criteria will include, but not be limited to, the following:

- Owned and occupied the damaged property at the time of disasters and still own the damaged home.
- Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation, reconstruction or elevation assistance.
- Applicants living in a Special Flood Hazard Area (SFHA) who receive federal assistance under these programs must obtain and maintain flood insurance for rehabilitated, reconstructed, or elevated properties.
- Applicants must agree to obtain and maintain homeowners insurance on the assisted property.

Homeowners must agree to occupy the property as their principal residence, maintain a homestead exemption, and maintain required insurance coverage.

Homeowner rehabilitation using \$50,000 or less of CDBG-DR funds will be grants.

For homeowner rehabilitation, replacement, reconstruction, or reconstruction with elevation activities exceeding \$50,000 in CDBG-DR funds, a mortgage and promissory note will be executed

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and recorded in the official records of Lee County, Florida before or at the time of activity completion. If the property is occupied as a primary homesteaded residence for the 5-year term, a satisfaction of mortgage will be given, and the mortgage will not have to be repaid. If, during the 5-year term, the property is sold, transferred, leased, or first mortgage is refinanced, or is not owner-occupied and homesteaded, then the prorated balance (amortizing at 20% per year) of the mortgage will be due and payable. Future requests for subordination will be considered on a case-by-case basis. Annual monitoring of properties will take place during the mortgage term including random site checks to ensure that properties are still owner-occupied.

Funding for individual housing rehabilitation, replacement, reconstruction, and reconstruction with elevation will be awarded to eligible applicants through a phased application process to the extent that funds are available. Lee County will open pre-applications on April 1, 2025. The pre-application package will gather basic information necessary to assess each applicants preliminary eligibility. Eligible applicants will then be required to complete an intake application and provide supporting documentation to confirm eligibility. Individuals will be prioritized for assistance in alignment with federal guidance. Lee County, through specific targeted outreach events, will attempt to reach populations who may have impediments to receiving assistance with information and available resources regarding programs.

Lee County will establish deadlines for submitting applications and will notify the public when applications are made available through press release, email newsletters, social media, and posting on the Lee County CDBG-DR website.

Lee County and its implementation vendors will manage and complete the construction process for the rehabilitation, reconstruction, reconstruction with elevation, or replacement of damaged homes on behalf of homeowners. Lee County and its implementation vendors have procured contractors in accordance with the requirements of 2 CFR 200 to complete work on behalf of the property owner and ensure the contractors repair or reconstruct damaged properties in a resilient manner. Lee County and its implementation vendors will require contractors to provide property owners with a one-year warranty on construction.

Maximum Amount of Assistance Per Beneficiary:

Minimum Award for an individual housing activity is: \$3,000.

As determined by the scope of work based on standard grade building materials as calculated by the program using national building standard estimating software, less any duplication of benefits (e.g., private insurance, private philanthropic funds, NFIP, FEMA or SBA) the County has determined a maximum award for rehabilitation of an individual housing unit is \$250,000 (excluding any project delivery costs).

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As determined by the scope of work based on standard grade building materials calculated using national building standard estimating software, less any duplication of benefits (e.g., private insurance, private philanthropic funds, NFIP, FEMA or SBA), the a maximum award for reconstruction and/or elevation of an individual housing unit is \$450,000 (excluding any project delivery costs).

Lee County may assist with interim housing, including temporary assistance for rental housing or long-term hotel/efficiency stays during a period when a household is unable to reside in their home during rehabilitation, replacement, reconstruction, or reconstruction with elevation. The maximum amount of assistance will be the amount determined to be reasonable and necessary based on the timeline required for rehabilitation, replacement or reconstruction.

Exceptions to Maximum Award Amounts: Limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the program policy, such as, reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, that can be addressed through construction measures necessary to mitigate the consequences of those conditions. The County will establish policies and procedures for applicants to apply for an exception. All exceptions to maximum award limitations are subject to grant fund availability.

Maximum Income of Beneficiary: Eligible applicants must have an income at or below 80% of the area median income to qualify for assistance.

Mitigation Measures: While this program will not count towards Lee County's mitigation set-aside, the program will rehabilitate, replace, and reconstruct homes in a manner that makes them more resilient to future disasters. Any homes with substantial damage inside of a special flood hazard area or homes that have any damage from Hurricane Helene or Hurricane Milton and are identified as a repetitive loss property, will be demolished and reconstructed with an elevation at least two feet above the base flood elevation. Mobile homes in a special flood hazard area will be replaced with more resilient mobile homes and elevated to at least two feet above the base flood elevation. Any structures seeking rehabilitation or reconstruction assistance inside of the floodway will be demolished and relocated outside of the floodway, either on the same lot (if feasible) or on a new lot (if reconstruction or replacement on the same lot is not feasible).

Newly constructed or reconstructed housing must achieve a minimum ENERGY STAR energy efficiency standard. Specific requirements will be outlined within programmatic policies and procedures. Other equivalent energy efficiency standards acceptable to HUD may be identified if necessary to ensure compliance with requirements of the applicable notices.

All rehabilitation, replacement, reconstruction, or reconstruction with elevation must meet an industry-recognized standard for green and resilient building. Lee County has received HUD

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approval to use Florida Green Building Coalition standards for the LeeCares program. Other equivalent green and resilient building standards acceptable to HUD may be identified if necessary to ensure compliance with requirements of the applicable notices.

For rehabilitation of non-substantially damaged residential buildings, Lee County will follow the guidelines to the extent applicable to the building type being retrofitted, as specified in the HUD CPD Green Building Retrofit Checklist. When older or obsolete products are replaced as part of rehabilitation work, the project is required to use the materials and equipment specified in the checklist (e.g., Energy Star-qualified, Water Sense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances).

Reducing Impediments to Assistance: Lee County recognizes that some residents have impediments that may make it difficult for them to access assistance programs. To reduce these impediments Lee County has implemented the following measures:

- ADA accessible outreach center in a central location within Lee County open from 9 am to 6 pm.
- Case management teams who can meet applicants in their own homes.
- Call center available from 9 am to 6 pm.



D. INFRASTRUCTURE

1. Infrastructure Programs Overview

Table 32. Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure Program Number One	\$24,400,000	9%
Total	\$24,400,000	9%

2. Grantee Infrastructure Program

Program Title: Lee County Public Facilities and Infrastructure

Amount of CDBG-DR Funds Allocated to this Program: \$24,400,000

Eligible Activity(ies): An infrastructure or public facility activity includes any activity or group of activities (including acquisition of site or other improvements), whether carried out on public or private land, that assist the development of the physical assets that are designed to provide or support services to the public. The Lee County Public Facilities and Infrastructure program allocates \$24,400,000 in CDBG-DR to Lee County to carry out eligible improvements or repairs to publicly owned physical assets that are designed to provide or support services to the public.

For purposes of this requirement, an activity that falls within this definition is an infrastructure activity regardless of whether it is carried out under sections 105(a)(2), 105(a)(14), or another section of the HCD Act, a waiver, or an alternative requirement established by HUD.

Infrastructure that is assisted by CDBG-DR must be designed and constructed in a resilient manner to withstand extreme weather events. Proposed activities shall include design and construction methods that promote adaptation and resilience, including the use of adaptable and reliable technologies to prevent premature obsolescence of infrastructure.

Typical infrastructure activities include the repair, replacement, relocation, or improvement of publicly owned facilities.

National Objective: All eligible activities will be required to meet a national objective in accordance with HUD guidelines in 24 CFR 570.208. Critical infrastructure activities identified by Lee County will document a description of the nature of the activity, the specific area and populations served, and the intended national objective for the proposed activity.

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Eligible national objectives must align with HUD guidelines based on the eligible activity type. A matrix detailing the national objective by activity type can be reviewed here: <https://files.hudexchange.info/resources/documents/Matrix-Code-National-ObjectiveTable.pdf>.

Urgent need may be used as an eligible national objective for critical infrastructure activities that are of particularly critical nature to the recovery or resiliency of a community, but do not meet the criteria for other national objectives. Such activities must demonstrate urgency and impact on recovery.

Lead Agency and Distribution Model: Lee County will serve as the lead and responsible entity for the implementation of this program. All activities undertaken are directly administered by Lee County and identified below.

Program Description: The Lee County Public Facilities and Infrastructure program allocates \$ 24,400,000 in CDBG-DR to Lee County to carry out eligible improvements or repairs that are designed to provide or support services to the public. Lee County has identified the following activities to be undertaken within this program:

- **Countywide Sidewalks and Drainage:**
 - This eligible activity may include the replacement of drainage and sidewalk facilities countywide.
 - Hurricane Tie Back: Hurricanes Helene and Milton brought storm surge and flooding to several areas of the County. Water inundation damaged sidewalks and caused failures in drainage systems. Further damage occurred during debris collection and cleanup immediately following the storm. Repairs and improvements are required to reduce flooding risk in the event of future storms.
- **Road Resurfacing and Resiliency Improvements**
 - This eligible activity may include resurfacing, replacement, and hardening of roads within impacted areas of Lee County.
 - Hurricane Tie Back: Hurricanes Helene and Milton brought storm surge, flooding and significant sand deposits to several areas of the County. Water inundation damaged roadways and caused failures in several areas. Further damage occurred during debris collection and cleanup immediately following the storm. Repairs and improvements are required to ensure safety for residents and prevent further damage in the event of future storms.
- **Other critical infrastructure and public facilities:**
 - These eligible activities may include the acquisition, construction, reconstruction, or rehabilitation of critical public facilities and infrastructure within impacted areas of Lee County.

- Hurricane Tie Back: Hurricanes Helene and Milton brought storm surge, flooding and significant sand deposits to several areas of the County. Water intrusion damaged facilities and infrastructure throughout the County. Repairs and improvements undertaken through this activity will ensure safety for residents and prevent further damage in the event of future storms.

Eligible Geographic Areas: Lee County, FL

Maximum Amount of Assistance Per Beneficiary: All activities will be undertaken by Lee County. The maximum amount of assistance available for this program is \$24,400,000.

Maximum Income of Beneficiary: Large infrastructure activities with a broad service area may benefit a large population of LMI persons, but because the area that benefits is so large the LMI population may be less than 51 percent. When this is the case, Lee County will utilize HUD's waiver of 24 CFR 570.484 and 24 CFR 570.200(a)(3) in accordance with the Universal Notice (90 FR 1754) to count funds expended for infrastructure activities towards benefitting LMI persons and meeting the overall benefit requirement by multiplying the total cost (including CDBG-DR and non-CDBG-DR costs) of the infrastructure activity by the percent of LMI persons in the service area, except that the amount counted shall not exceed the amount of CDBG-DR funds provided.

Mitigation Measures: All CDBG-DR funded infrastructure and public facility activities must be designed and constructed in a resilient manner to withstand extreme weather events. Infrastructure projects undertaken through CDBG-DR will be focused on reducing the risks associated with high flood water and storm surge by including engineered or non-engineered solutions to retain, detain, divert, or convey excess water to lower the risk of flooding. Mitigation improvements will aim to create more resilient infrastructure systems and increase the unit of general local government's ability to ensure continuous operation of indispensable services during a future hazard event.



E. PUBLIC SERVICE

1. Public Services Programs Overview

Table 33. Grantee Public Services Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Is this Program Exempt from the 15% Public Service Cap?
Public Services Program Number One	\$1,000,000	1%	No
Public Services Program Number Two	\$14,102,450	15%	No
Total	\$15,102,450	16%	No

2. Grantee Public Services Program Number One

Program Title: Disaster Relief Assistance

Amount of CDBG-DR Funds Allocated to this Program: \$1,000,000

Eligible Activity(ies): Funds may be used to provide disaster relief assistance for low- and moderate-income persons only for eligible costs related to Hurricane Helene or Hurricane Milton.

National Objective: Low- and Moderate Income; Limited Clientele Activities

Lead Agency and Distribution Model: Lee County will serve as the lead and responsible entity for the distribution of disaster relief assistance. Disaster relief assistance will only be made available to individuals who receive assistance through the Lee County Housing Rehabilitation, Reconstruction and Elevation program (LeeCares). Lee County anticipates that households with damages to their residence may also have unmet recovery needs outside of housing repair. The provision of disaster relief assistance is anticipated to play a key part in the holistic recovery of the households whose properties were damaged or destroyed.

Program Description: Because disasters qualifying for CDBG-DR awards represent the worst levels of destruction and hardship, those recovering often struggle to maintain employment, make rent or mortgage payments, and access many other essential items and services while also trying to fully recover from the disaster months and years after the event. Because damages to housing units often exacerbate these challenges, disaster relief assistance may be necessary to ensure the household is able to fully recovery from the impacts of Hurricane Helene or Hurricane

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Milton. Lee County will allocate \$1,000,000 in CDBG-DR funds to provide disaster recovery assistance to households receiving assistance through Lee County's Housing Rehabilitation, Reconstruction and Elevation Program.

Eligible Geographic Areas: Lee County, FL

Other Eligibility Criteria:

Eligible households must:

- have an annual income less than or equal to 80% of the area median income
- have received an award for Lee County's Housing Rehabilitation, Reconstruction and Elevation Program
- Have used all available assistance (FEMA, Insurance, etc.) for losses suffered as a result of Hurricane Helene or Hurricane Milton

Maximum Amount of Assistance Per Beneficiary: Eligible households may receive a maximum of \$5,000 in disaster relief assistance.

Maximum Income of Beneficiary: Eligible households must have a total household income at or below 80% of the area median income.

Mitigation Measures: While disaster relief assistance is intended to provide short term assistance for eligible household expenses, case managers will make referrals to local organizations providing budget counseling, housing finance counseling or other available resources to mitigate financial distress in the event of future disasters.

Reducing Impediments to Assistance:: Lee County recognizes that some residents have impediments that may make it difficult for them to access assistance programs. To reduce these impediments Lee County has implemented the following measures:

- ADA accessible outreach center in a central location within Lee County open from 9 am to 6 pm.
- Case management teams who can meet applicants in their own homes.
- Call center available from 9 am to 6 pm.

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3. Grantee Public Services Program Number Two

Program Title: Behavioral Health

Amount of CDBG-DR Funds Allocated to this Program: \$14,102,450

Eligible Activity(ies): Funds may be used to provide behavioral services.

National Objective: Low- and Moderate Income; Limited Clientele Activities

Lead Agency and Distribution Model: Lee County will serve as the lead and responsible entity for the distribution of funds for behavioral health services. Lee County may conduct a Notice of Funding Availability process or make a direct allocation of funds to one or more subrecipients.

Program Description: Many residents experience persistent concerns and challenges resulting from the loss and trauma of natural disasters. Having a robust behavioral health care system will help provide residents the care they need to recover from recent storms and to better prepare for future storms. Lee County is currently completing a behavioral health planning study which will identify gaps and make recommendations for improving access and outcomes for behavioral health services in Lee County. Funds allocated for this program will be used to implement those recommended interventions.

Eligible Geographic Areas: Lee County, FL

Other Eligibility Criteria: Lee County will oversee the subrecipient agreements for the public services projects identified within this plan. Subrecipients must have provided direct behavioral health services for a least 12 months prior to the date of application.

Subrecipients must be a legally formed entity qualified to do business and provide behavioral health services in the state of Florida as of the Application deadline. Evidence from the Florida Department of State, Division of Corporations that the Applicant satisfies the foregoing requirements will be required as an application attachment.

Subrecipients must also meet all the following requirements:

- Independent certified audited financial statement of the most recent or immediate prior fiscal year, including the management letter and written response (exceptions may be considered on an individual basis) or most recent single audit, if the entity is a non-federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in federal awards, in accordance with 24 CFR 200.501.
- Current CPA's Peer Review letter of Monthly Financial Statements (within last 60 days).
- Any applicant on the excluded parties list (www.sam.gov) will be considered ineligible for funding.

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- Have previous experience administering projects of a similar size and scope and/or working with federal or state grant funds.

Maximum Income of Beneficiary: The total amount awarded to one more subrecipients will be dependent on the service being provided, however a single applicant may receive the full amount allocated to this program.

Mitigation Measures: The provision of behavioral health services is intended to address the continuing unmet and exacerbated need caused by multiple disasters. However, access to effective behavioral health services in Lee County is intended to provide residents with the tools necessary to better prepare for future disasters.

Reducing Impediments to Assistance: Lee County recognizes that some residents may have impediments that may make it difficult for them to access assistance programs. Lee County will ensure that funded services adhere to ADA requirements and make efforts to reduce impediments to accessing assistance.

F. CDBG-DR MITIGATION SET-ASIDE

1. CDBG-DR Mitigation Set-Aside Programs Overview

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

Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
CDBG-DR Mitigation Set-Aside Standalone Program Number One	\$13,133,000	0%	No
Total:	\$13,133,000	0%	No

2. Grantee CDBG-DR Mitigation Set-Aside Program Number One

Program Title: Mitigation Public Facilities and Infrastructure

Amount of CDBG-DR Funds Allocated to this Program: \$13,133,000

Eligible Activity(ies): An infrastructure or public facility activity includes any activity or group of activities (including acquisition of site or other improvements), whether carried out on public or private land, that assist the development of the physical assets that are designed to provide or support services to the public. The Mitigation Public Facilities and Infrastructure program allocates \$13,133,000 in CDBG-DR to Lee County to carry out eligible improvements or repairs to publicly owned physical assets that are designed to provide or support services to the public.

For purposes of this requirement, an activity that falls within this definition is an infrastructure activity regardless of whether it is carried out under sections 105(a)(2), 105(a)(14), or another section of the HCD Act, a waiver, or an alternative requirement established by HUD.

Infrastructure that is assisted by CDBG-DR must be designed and constructed in a resilient manner to withstand extreme weather events. Proposed activities shall include sustainable planning and design methods that promote adaptation and resilience, including the use of adaptable and reliable technologies to prevent premature obsolescence of infrastructure.

Typical infrastructure activities include the repair, replacement, relocation, or improvement of publicly owned facilities.

National Objective: All eligible activities will be required to meet a national objective in accordance with HUD guidelines in 24 CFR 570.208. Critical infrastructure activities submitted for funding through CDBG-DR must document a description of the nature of the activity, the specific area and populations served, and the intended national objective for the proposed activity.

Eligible national objectives must align with HUD guidelines based on the eligible activity type. A matrix detailing the national objective by activity type can be reviewed here: <https://files.hudexchange.info/resources/documents/Matrix-Code-National-ObjectiveTable.pdf>.

Urgent need may be used as an eligible national objective for critical infrastructure activities that area of particularly critical nature to the recovery or resiliency of a community, but do not meet the criteria for other national objectives. Such activities must demonstrate urgency and impact on recovery.

Lead Agency and Distribution Model: Lee County will serve as the lead and responsible entity for the implementation of this program.

Matching grants for CDBG-DR eligible activities that have been awarded by an eligible federal agency (FEMA, USDA, USACE, or FHWA) will be requested through an online application form available to eligible applicants.

Recommendations for funding will be presented to the BoCC for final evaluation. The BoCC has final authority to award project funding. The entities/agencies awarded projects will become subrecipients under the Lee County CDBG-DR program.

Program Description: As provided by the HCDA, CDBG-DR funds may be used to satisfy a match requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG-DR activity. The Mitigation Public Facilities and Infrastructure program may provide CDBG-DR funds to meet the local match requirements for CDBG-DR eligible, awarded, Hazard Mitigation Grant Program (HMGP), Federal Highway Administration (FHWA), United States Department of Agriculture (USDA), United State Army Corps of Engineers (USACE), and FEMA Public Assistance activities. Activities include mitigation projects that will result in protection of public or private property from natural hazards. Eligible activities include, but are not limited to, the following:

- Acquisition or relocation of hazard-prone structures;
- Retrofitting of existing buildings and facilities that will result in increased protection from hazards;
- Elevation of flood-prone structures;
- Infrastructure protection measures;
- Stormwater management improvements;

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- Minor structure flood control;
- Flood diversion and storage; or
- Floodplain and stream restoration.

Eligible Geographic Areas: Lee County, FL

Other Eligibility Criteria:

All applicants must have written documentation demonstrating that the activity has been awarded by an eligible federal entity (FEMA, USDA, USACE, or FHWA).

Lee County may adopt procurement policies and procedures that satisfy the other Federal agency's requirements to promote consistency and seamlessly leverage funding, so long as awarded activities meet other cross-cutting requirements that apply to the CDBG-DR funds (e.g., Section 3 requirements, Davis Bacon Act, etc.) in accordance with the Universal Notice (90 FR 1754). Lee County will identify which procurement policies and procedures will apply and keep decision documents in activity files.

Lee County may provide assistance for buildings for the general conduct of government in accordance with the Universal Notice (90 FR 1754), which waives the requirements at 42 U.S.C. 5305(a)(2) and associated regulations at 24 CFR 570.207(a) when funds are used for non-Federal match. CDBG-DR funds will not be used for buildings that do not provide services all year around and for buildings that are used exclusively as emergency operations centers.

Maximum Amount of Assistance Per Beneficiary:

Minimum Award: Minimum required match for the eligible activity.

Maximum Award: Determined by Lee County on a case-by-case basis. Lee County may provide project funding above the required match to ensure compliance with required resiliency standards.

Maximum Income of Beneficiary: Large infrastructure activities with a broad service area may benefit a large population of LMI persons, but because the area that benefits is so large the LMI population may be less than 51 percent. When this is the case, Lee County will utilize HUD's waiver of 24 CFR 570.484 and 24 CFR 570.200(a)(3) in accordance with the Universal Notice (90 FR 1754) to count funds expended for infrastructure activities towards benefitting LMI persons and meeting the overall benefit requirement by multiplying the total cost (including CDBG-DR and non-CDBG-DR costs) of the infrastructure activity by the percent of LMI persons in the service area, except that the amount counted shall not exceed the amount of CDBG-DR funds provided.

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Mitigation Measures: All CDBG-DR funded infrastructure and public facility activities must be designed and constructed in a resilient manner to withstand extreme weather. Infrastructure projects undertaken through CDBG-DR will be focused on reducing the risks associated with high flood water and storm surge by including engineered or non-engineered solutions to retain, detain, divert, or convey excess water to lower the risk of flooding. Mitigation improvements will aim to create more resilient infrastructure systems and increase the unit of general local government's ability to ensure continuous operation of indispensable services during a future hazard event.

VII. GENERAL INFORMATION

A. CITIZEN PARTICIPATION

1. Consultation of Developing the Action Plan

During the creation of the Action Plan, Lee County consulted with local stakeholders to understand unmet needs and evaluate the most effective program design. Consultations were ongoing upon the publication of the Action Plan for the 30-day public comment period. The Action Plan may be updated as additional information is gathered through consultations and public input.

Table 35. Partners Consulted

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	Lee County received FEMA Individual Assistance Data and Small Business Administration Data through data sharing agreements. Data was used for the completion of the unmet needs analysis.
Local/State Government	Lee County consulted with local municipalities during the stakeholder consultation meeting held on March 5, 2025, and via direct email. Most municipalities provided information related to unmet needs and FEMA Public Assistance provided.
Nongovernmental organizations	Lee County consulted with nonprofit stakeholders during the stakeholder consultation meeting held on March 5, 2025. Stakeholders provided input regarding community needs and ongoing disaster impacts.
Private sector	Lee County assessed the needs of private sector businesses through consultation with Lee County Economic Development office and Lee County's Visitors and Convention Bureau. Needs identified through this consultation are included in the Economic Revitalization section of the unmet needs analysis.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	The County's Department of Emergency Management coordinates the Disaster Advisory Council (DAC) which consists of local jurisdictions and makes recommendations to the State of Florida Division of Emergency Management with respect to the ongoing list of local hazard mitigation projects. The County holds regular quarterly meetings of the DAC. Input was also received from the County's Mitigation and Accreditation Coordinator regarding ongoing mitigation needs, efforts, and priorities.
Agencies that manage local Continuum of Care	Lee County's Department of Human and Veteran Services serves as the Lead Agency for the Continuum of Care. Human and Veteran Services provided recent data from the Homeless Management Information System and the coordinated entry system. The agency

Partners Consulted	Describe Consultation
	also provided the most recent Point in Time and Housing Inventory Count reports, which were included in the unmet needs analysis.
Public Housing Authorities	The County consulted with both Public Housing Agencies (Housing Authority of the City of Fort Myers and the Lee County Housing Authority) via email to obtain information on impacts and the current recovery status of public housing facilities, and housing choice vouchers properties and their remaining unmet need.
HUD-approved housing counseling agencies	The County consulted with Habitat for Humanity and the Affordable Homeownership Foundation via email to obtain information on impacts and the current recovery status of properties and the current unmet need amount.
State Housing Finance Agencies	The County attempted to consult with the Florida Housing Finance Corporation (FHFC) via email to obtain information on impacts and the current recovery status of its Low-Income Housing Tax Credit (LIHTC) properties and the current unmet need, but did not receive a response.

2. Public Comments

In accordance with HUD requirements, Lee County made the Action Plan available for public comment for a 30-day period beginning February 18, 2025, and ending March 20, 2025. All comments are summarized below and were considered in the formulation of the final action plan. A list of all comments received are incorporated into this action plan in Section IX.

a) Summary of Public Comments

Lee County received a total of 18 public comments during the public comment period. Thirteen of the comments were related to housing needs. Some commenters emphasized the need for funding to be used to support individual homeowners who are in need of assistance to repair or reconstruct their homes. Other comments were related to the costs of insurance, rent, and relocation. Some commenters discussed the need for reimbursement of repair costs already expended.

Five comments received were related to public facilities and infrastructure needs. Most commenters discussed the need for drainage improvements, improved storm water management facilities, and additional flood control measures.

b) Response to Public Comments

While Lee County responded individually to all commentors, a summary of those responses is as follows:

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Many of the comments related to housing emphasized the need for the individual housing assistance program, which is described within this Action Plan. A total of \$43,013,400 is allocated to housing rehabilitation, replacement, reconstruction, and reconstruction with elevation. This program is intended to assist income eligible homeowners with property damage from Hurricane Helene or Hurricane Milton to make necessary repairs or replace their housing unit. Additionally, \$1,000,000 is being allocated from the Public Services activity to assist homeowners who are receiving individual housing assistance with other disaster related unmet needs that were caused or exacerbated by the damages to their residence.

A total of \$37,533,000 is being allocated to address critical infrastructure needs, which may include improvements to drainage, resiliency improvements to roadways, and other improvements that may address commentors concerns related to drainage and stormwater management.

3. Public Hearings

Lee County held a total of three public meetings at which public comment was received regarding the CDBG-DR action plan. The public meetings are as follows:

- February 18, 2025, at 9:30 AM
Lee County Board of County Commissioners Meeting
Old Lee County Courthouse, 2120 Main St., Fort Myers, FL 33901
- March 5, 2025, at 5:30 PM
Estero Recreation Center
9200 Corkscrew Palms Blvd, Estero, FL 33928
- April 1, 2025, at 9:30 AM
Lee County Board of County Commissioners Meeting
Old Lee County Courthouse, 2120 Main St., Fort Myers, FL 33901

a) Accessibility of Public Hearings

Citizens and stakeholders have reasonable and timely access to the public hearing(s). In public hearings, the County provides the opportunity for citizens to submit comments orally or in writing. The County treats written and oral comments equally and incorporates both in the response document submitted to HUD with the Action Plan and any substantial amendments.

Lee County will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the County's programs, services, and activities, including qualified sign language interpreters, documents translated into preferred digital or print formats, and other ways of making information and communications accessible to those who use accommodations for speech, hearing, or vision.

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All in-person public meetings and hearings will be held in locations accessible to all persons with disabilities. Existing federal requirements provide that where physical accessibility is not achievable, the County will give priority to alternative methods of product or information delivery that offer programs and activities to qualified individuals with disabilities in the most integrated setting appropriate under HUD's implementing regulations for Section 504 of the Rehabilitation Act (See 24 CFR part 8, subpart C). All accommodations are made in accordance with Lee County's ADA policies outlined here: Lee County's ADA policies outlined here: <https://www.leegov.com/ada>.

Online materials will also be accessible for the visually impaired. Lee County provides online content in formats accessible to optical character readers (OCR) and screen readers. Print copies of Action Plans can be made available in large print format by request.

Anyone who requires an auxiliary aid or service should contact Raphaela Morias-Peroba, rperoba@leegov.com, (239) 533-8782 or Florida Relay Service 711, as soon as possible but no later than five (5) business days before the scheduled event or before the accommodation is needed for effective communication, such as a sign language interpreter and/or other appropriate accommodations or a modification of policies or procedures to participate in a County program, service or activity.

To request language interpretation or document translation at no charge to the requestor, interested parties can contact Raphaela Morias-Peroba, rperoba@leegov.com, (239) 533-8782 or Florida Relay Service 711, at least five (5) business days in advance of the hearing.

El Condado de Lee brindará servicios de traducción sin cargo a personas con el idioma limitado del inglés. (Lee County will provide translation services free of charge to people with limited English language skills.)

The County and its vendors and subrecipients will follow its FY 23/24 Civil Rights Act, Title VI Nondiscrimination Policy which is available online at <https://www.leegov.com/civilrights> and on the Lee County CDBG-DR website at www.leegov.com/recovery/cdbg-dr, the County will:

- Communicate information contained in vital documents.
- Provide ADA compliant interpretation services at no cost to the person being served.
- Inform residents of these services and their right to access them free of charge.
- Accommodate public input from the community.
- Manage this plan routinely to ensure continuing compliance.

Lee County is committed to on-going outreach to potential beneficiaries throughout the program. This outreach includes establishing and preparing a network of stakeholders, including elected officials, non-profits, faith-based organizations, civic associations, and media outlets, to ensure well-coordinated and effective outreach. Lee County is requiring vendors implementing

CDBG-DR programs to coordinate with the County and municipalities to ensure physical access to program applications throughout the geographic area, and provide for multiple application entry points, including onsite and mobile application sites. Vendors are also required to provide appropriate ADA accommodations and translation of vital documents.

The County will ensure ongoing coordination with public service providers that work with storm impacted populations to address any remaining or ongoing impacts, including preventing households from becoming homeless, is brought to the County's attention for a coordinated approach. In addition, any storm impacted population brought to the County's attention who are not served under current programs may be referred to specialized public service providers for assistance. Supportive services for persons with additional needs will be coordinated through local service providers and the Unmet Needs Long-Term Recovery Group.

The County will provide oversight and monitoring of its subrecipients in accordance with 2 CFR 200.331 and 24 CFR Part 570. Subrecipients must maintain documentation that demonstrates efforts to comply with federal requirements. Documentation may include, but is not limited to, the following:

- marketing and outreach efforts that reduce impediments to the provision of services;
- reports demonstrating the provision of assistance to eligible beneficiaries.

4. Consideration of Public Comments

All comments will be considered in the formulation of the final action plan. A summary of all comments received will be incorporated into the final action plan prior to submission to HUD.

5. Citizen Complaints

Lee County strives to help meet the needs of all beneficiaries and subrecipients while following the applicable federal, state and/or Lee County regulations and guidelines governing each program. However, there may be instances in which a subrecipient or beneficiary wishes to file a complaint. A complaint is defined as a written or verbal statement or grievance that a situation or behavior is unsatisfactory or unacceptable: (1) an allegation of fraud, waste, or abuse; and/or (2) communication of dissatisfaction of a program and/or personnel. It is the policy of Lee County to provide a clear and fair process for beneficiaries and subrecipients to file a complaint regarding their service or appeal a decision regarding their case.

Beneficiaries or subrecipients have the right to discuss their concerns regarding the eligibility determination, delivery of service, staff actions and/or perceived violation of their rights in a constructive manner.

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When appropriate, the County encourages applicants or subrecipients to try to resolve their concerns or disputes directly with a staff person before engaging in a grievance process. If those efforts do not resolve the issue, they may engage the formal complaint procedure.

Beneficiaries and subrecipients may express their concerns in writing to the email or mailing address below.

Strategic Resources and Government Affairs staff will investigate the complaint and provide a written response to the beneficiary or subrecipient within 15 working days after receipt of the complaint.

Complaints will be handled sensitively and fairly. A thorough review of any applicable program documentation and contractual agreements will be conducted, and clear and respectful methods of communication will be used to help prevent and resolve complaints.

The Lee Board of County Commissioners will hear complaints or grievances from the public regarding the development of the Action Plan as well as any substantial amendments to the Action Plan.

The public may submit complaints related to CDBG-DR funded activities through any of the following means:

- Via email at: recovery@leegov.com
- Online at: <https://2024-cdbgdr.leegov.com/>
- Mailed to:
Lee County Government County Administration
c/o Strategic Resources and Government Affairs
PO Box 398
Fort Myers, FL 33902

The complaint will clearly state what the activity and associated program is; the nature of the complaint or grievance; and the name, address, and day and evening telephone numbers of the person filing the complaint. Upon receipt of a complaint, County staff will prepare a written substantive response to the complainant within 15 working days.

If necessary, complaints or grievances will be heard in a timely fashion by the Lee County Manager or Assistant County Manager.

The process for complaints regarding fraud, waste, or abuse of government funds can be found at <https://cdbgdr.leegov.com/>.

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Complaints alleging violation of fair housing laws can be made to HUD's office of Fair Housing and Equal Opportunity for Region 4, via phone at (800) 440-8091 or via email to complaintsoffice04@hud.gov.

Lee County Office of Strategic Resources and Government Affairs will refer all reported instances of fraud, waste, abuse or mismanagement of CDBG-DR funds to HUD's OIG. 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.com).

Additional external resources for reporting alleged fraud, waste, abuse or mismanagement include: The Lee County Clerk of Court and Comptroller Inspector General Department Hotline online at: www.leeclerk.org/reportfraud, by email at: Info_InspectorGeneral@leeclerk.org, or by phone at: 239-3377799. The Clerk's Inspector General Department conforms to the Association of Inspectors General (AIG) Principles and Standards for Offices of Inspector General (Green Book) and The Commission for Florida Law Enforcement Accreditation (CFA) The Florida Inspector General Standards Manual.

Lee County's detailed Fraud, Waste, and Abuse Policies and Procedures on the Recovery website located at: <https://cdbgdr.leegov.com/>.

Appeals

An appeal is a written dispute requesting a reversal or revision of a determination that affects eligibility and/or assistance. Appealable decisions may include determinations of eligibility, award amount, inspection results, and funding requirements.

Adopted policies and statutory and regulatory requirements/guidelines may not be appealed. Lee County will implement appeal processes for beneficiaries and subrecipients related to program eligibility and program application process. The point of contact and procedure for submitting the is detailed in the appropriate program policies and procedures.

B. MODIFICATIONS TO THE ACTION PLAN

Over time, recovery needs will change. Thus, Lee County will amend the disaster recovery Action Plan as often as necessary to best address its long-term recovery needs and goals. This plan

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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.

Amendments will clearly identify the changes including what content is being added, deleted, or changed, and will include a chart or table that clearly illustrates where funds are coming from and to where they are being moved. Further, any changes resulting in a budget amendment will include a revised budget allocation table that reflects the entirety of all funds.

1. Substantial Amendment

A substantial amendment to the CDBG-DR Action Plan is defined as follows:

- a. A change in program benefit or eligibility criteria;
- b. The addition or deletion of an activity;
- c. The allocation or reallocation of funds which exceeds or is expected to exceed 5 percent of the current total approved budget;
- d. *A proposed reduction in the overall benefit requirement;*
- e. *An update to the submitted initial Action Plan if the original submission was incomplete (including maximum amount of assistance);*
- f. A material change occurs. A material change is a change in circumstances within Lee County that affects the information on which the Action Plan is based to the extent that the analysis or the priorities and goals of the Action Plan no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), that are of such a nature as to significantly impact the anticipated beneficiaries; project or activity scope; significant demographic changes; new significant contributing factors or unmet needs in the jurisdiction; and/or
- g. Upon HUD's written notification specifying a material change that requires the revision.

Substantial amendments are subject to the citizen participation process. Therefore, a public notice of the proposed substantial amendment will be issued and will allow for a 30-day public comment period. When Lee County pursues the substantial amendment process, the amendment will be posted at cdbgdr.leegov.com for a 30-day public comment period. The amendment will be posted in adherence with ADA requirements. Lee County will review and respond to all public comments received and submit to HUD for approval.

Notice of the amendments will be posted on the Lee County CDBG-DR website, which is accessible through any internet connection, including those at public libraries. Comments or

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views received orally or in writing will be considered in preparing the substantial amendment. A summary of the comments or views and Lee County's responses will be included with the final substantial amendment to the CDBG-DR Action Plan.

2. Non-substantial Amendment

Non-Substantial Amendments include technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment Lee County will notify HUD five (5) business days before the change is effective.

Every amendment, substantial or not, is numbered sequentially and posted on the website into one final, consolidated plan.

C. PERFORMANCE REPORTS

Official Reporting

HUD requires quarterly performance reports (QPR). Lee County and subrecipients will prepare the information for the report. Lee County's systems of record will house and provide much of the reporting data. Data from the system will be exported for entry into the HUD reporting system DRGR.

Lee County SRGA will submit the required reports to HUD through the DRGR portal by the required due date. Within three (3) days of submission to HUD, Lee County will post the report on website with all personally identifiable information moved, or in the event a performance report is rejected by HUD, publish the revised version, as approved by HUD, within three days of HUD approval.

Public Reporting

In addition to the QPRs that will be online, Lee County will develop ways to share additional programs progress and spending with the public using the website.

VIII. CERTIFICATIONS WAIVER AND ALTERNATE REQUIREMENT FOR ACTION PLAN SUBMISSION

Each grantee receiving an allocation under an AAN must make the following certifications with its action plan in addition to the certifications at 24 CFR 91.225 and 92.335:

- a. **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan**
 - The grantee certifies that it:
 - (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements; and
 - (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. **Authority of Grantee:** The grantee certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c. **Consistency with the Action Plan** - The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d. **Citizen Participation**-The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). 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**-The grantee certifies that it is complying with each of the following criteria:
 - (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 *et seq.*).
 - (2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - (3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent

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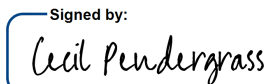
(or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

- (4) **Special Assessment.** The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- f. **Grant Timeliness-** The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- g. **Order of Assistance-** The grantee certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 of the Universal Notice ([90 FR 1754](#)) 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.

Lee County hereby certifies that submission of this Action Plan for CDBG-DR funds is authorized under local law and that the Lee County Board of County Commissioners possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Authorized Responsible Entity's Signature:

Signed by:

 773513E34E2140B

4/1/2025 | 2:31 PM EDT

Vice Chair, Lee County Board of County Commissioners

Date

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IX. PUBLIC COMMENTS

Action Plan Public Comments Received
February 18, 2025 - March 20, 2025

Zip Code	Comments
33916	<p>My concerns are around continued flooding along the Caloosahatchee and Billy's Creek Areas. There has been little to no efforts made to improve surface water drainage into Billy's Creek and then into the Caloosahatchee. This causes significant flooding in the surrounding neighborhoods, causing homes to flood, and major streets to become impassible.</p> <p>Seawalls and berms need addressed up and down the Caloosahatchee, especially in the Billy's Creek area to better prevent flooding like we had in Ian, Helene, and Milton.</p> <p>I understand that some of this area falls under the city of fort myers but as a resident of Lee County, I expect my municipalities to work together to strengthen and save our communities from further flooding disasters.</p>
33914	<p>Please stop building all this low income housing. The rents being charged are not that much different from what is currently available on the free market.</p> <p>For that much money you could give everyone a new metal roof.</p>
33931	<p>We own in a 55+ community at the Indian Creek Resort. It's a double wide home, we are 4 feet off the ground. We got a total of 7-8 feet of water from Ian. We received no help from FEMA, no help from anyone. We repaired the entire home, full gut inside and out. All new electric, plumbing, walls, lights, and floors. We had to do all new outside sliding. After we paid for repairs, we were hit from Helene and Milton, all underneath the home was destroyed which required all new installation of HVAC again.</p>
33931	Have a lot and need a new elevated home.
33908	Need to know about senior living rebuild.
33908	<p>Infrastructure. Palmetto Palms Flood Mitigation Committee member. John Morris Rd. ditch needs cleaned up as well as Summerlin Road. For our flood mitigation plan to work, we need help from the county to clean up and improve John Morris Rd. ditch.</p>
33908	<p>Tried LeeCares for Ian, needed help to rebuild but I am permanently disabled. I lived in Indiana Creek after demolishing my home. I purchased a lot on Bombay Lane, Lee County doesn't own property in Indiana Creek but does own it on Bombay. LeeCares stated they could not help me due to not owning property at the time of the storm. I am homeless, lost everything and need help. Please if anything I can do is receive funds to rebuild, it would be greatly appreciated. I'm begging for help. Also told other residents they can get help rebuilding if they move.</p>
33931	Reimbursement for repairs already made?
33931	<p>My husband and I recently went to Washington DC and I spoke at the press conference on Capital Hill. We lost our home to Ian and we are still trying to survive. I would like to see financial relief in the form of rental assistance or relocation assistance or a new home. I learned a lot about CDBG-DR in DC. We fought for these funds and I have faith that these new funds will be put into the right hands.</p>
33908	<p>I've looked at the action plan and I believe we need:</p> <ul style="list-style-type: none"> -More money for housing -A fairer application process (instead of first come first served) -Community oversight board to make sure that these funds are spent well

Action Plan Public Comments Received
February 18, 2025 - March 20, 2025

Zip Code	Comments
55374	<p>Provide financial assistance to out of state Florida home owners who lost hundreds of thousands of dollars and got ZERO from FEMA, Red Cross and insurance!</p> <p>Clean out the culverts along Pine Ridge Road between Summerlin Road and San Carlos Blvd. in order for water to flow to drainage pipes!</p> <p>Enlarge drainage pipes from Sun Resorts Indian Creek to enable water to flow to Summerlin Ave drainage as its suppose to!</p> <p>PLEASE HELP THOSE OF US WHO HELP YOUR STATE, CITY ECONOMY THE MAJORITY OF THE YEAR!</p>
33931	Funds desperately needed for those of us that had to rebuild our homes with our own money because insurance didn't pay out
33931	Need help with property tax reduction and reimbursement of costs to rebuild/repair home from hurricanes. Need help ASAP.
33931	<p>A booklet with helpful hints to survivors.</p> <p>After 3 hurricanes one of the most important pieces of advice is to use ductless ac. Many of my neighbors have had to replace ducts that run under their homes several times</p> <p>FEMA and the SBA could not seem to understand that I couldn't rebuild my home that was destroyed by Ian. I bought a home in the same park and every interaction with FEMA/SBA (there were many) was a rehash of my having changed addresses.</p>
33931	Help / assistance with the price of flood insurance - since receiving a SBA loan , must have flood insurance
33908	<p>I believe since this is tax payers money it should be given back to the people that need it people don't have the money to rebuild I think Lee county needs to drive around and see how many people are living in travel trailers and have nothing and can't get back on their feet because they have no work because there's nothing in Fort Myers Beach anymore or Fort Myers. People that rebuilt asking for money back I believe should be on their own if they have enough money to rebuild they have enough money to keep going they probably own two houses also they should not be allowed to receive anything. But the people that work the storm came and destroyed everything they had and took everything inside their homes how are they supposed to get back on their feet again I believe the money should be given to people to get a home to get Fort Myers and Fort Myers Beach back on their feet again for the middle class not the Rich and famous. And have it the people in social security and disability I myself workers compensation and can I get a loan due to me not knowing where my next paycheck is going to come from now I am on social security and disabled permanently what am I supposed to do now.</p>
33931	<p>I am on the board of the Fort Myers Beach Art Association. We need 3 million to rebuild our building on Donora blvd on fort Myers beach to FEMA standards. We are an active member of FMB. We teach art classes, have open air painting, children's classes, and one of our members teaches art at the school, another volunteers every week at the school. We pay for art scholarships to local high school students. We contribute supplies, money, volunteer hours to fort Myers beach elementary.</p> <p>We need help getting back in the beach.</p>
33931	Need help with reimbursement for recovering our fort Myers beach block home from flooding in Helene and Milton. We are exhausted and need help. Concerns on what to do next.

Action Plan Public Comments Received
February 18, 2025 - March 20, 2025

Zip Code	Comments
56201	<p>My suggestion for part of the funds is to help homeowners recover some financial costs. My husband and I are snowbirds in Sun Communities at Indian Creek since 2020. Because we are not Florida residents, we were not eligible for FEMA so received no financial help.</p> <p>We spent over \$87,000 so far since Jan to rebuild our hi-rise manufactured home. After the last two hurricanes, we had to replace the ductwork twice, fix the carport, shore the pilings and bands underneath, replace downspouts, replace siding, landscape for drainage, fix access doors, etc. Financially, if another hurricane hits, we do not have any more money to rebuild. We have taken a loan out already.</p> <p>Can homeowners be reimbursed for money spent to rebuild since the last two hurricanes? We could show receipts and bills that we have spent. This should not be any different if we are a Florida resident or a snowbird. We all are living here and buy groceries, gas, restaurants, etc. in Lee County and we pay high HOA fees to Sun Communities at Indian Creek. It should not make any difference if we are a snowbird or a Florida resident. We also suffered great financial and emotional loss!</p> <p>My second suggestion is to work on the water flow system to assist in water drainage and run-off. Thank you.</p>