2023
ACTION PLAN

COMMUNITY DEVELOPMENT BLOCK GRANT
DISASTER RECOVERY FUNDS

Lee County *Southwest Florida*

Lee Board of County Commissioners
2120 Main Street
Fort Myers, Florida
www.leegov.com/recovery/cdbg-dr

EQUAL HOUSING OPPORTUNITY

Lee County Action Plan

for Community Development Block Grant – Disaster Recovery (CDBG-DR) Funds

Consolidated Appropriations Act of 2023
(Public Law 117-328)

Hurricane Ian
FEMA – 4673 – DR
Declared September 29, 2022

CFDA# 14.218
Federal Register Notice: 88 FR 32046

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

A. OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) awarded Lee County $1,107,881,000 in funding to support long-term recovery efforts following Hurricane Ian (FEMA – 4673 – DR) through the Office of Disaster Recovery (ODR) within the Office of Community Planning and Development. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet needs in Lee County.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed 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 $1,107,881,000 in CDBG-DR funds to Lee County in response to Hurricane Ian (FEMA – 4673 – DR)*, through the publication of the Federal Register, 88 FR 32046 (*May 18, 2023).* *https://www.hud.gov/sites/dfiles/CPD/documents/6393-N-01CDBG-DR-Allocations.pdf*). This allocation was made available through PL 117-328: Consolidated Appropriations Act, 2023.

Lee County's Department of Strategic Resources and Government Affairs (SRGA) is the lead and responsible agency for administering the CDBG-DR funds allocated to Lee County. This Action Plan describes SRGA's analysis of the collective local impact of Hurricane Ian (DR 4673), the remaining unmet needs, and the County's plan for distribution of funds to the households and areas of the County most impacted by the storm. Lee County is committed to directing CDBG-DR funds to benefit low- and moderate-income households and area, in accordance with Section 103 of the Housing and Community Development Act. To ensure that projects are deployed in a timely manner and to streamline the recovery process, HUD provided multiple waivers and flexibilities in 88 FR 32046. 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

In the past two years, Lee County jumped to the 9th fastest growing county in the U.S. The expanding number of secondary homes and growing tourism contributed to the significant strain on already limited housing and infrastructure capacity. On Wednesday, September 28, 2022, Hurricane Ian made landfall at Cayo Costa as a strong Category 4 hurricane with top wind speeds of 150 mph. Over 10 feet of storm surge impacted the barrier islands, Fort Myers Beach, and coastal areas along the Caloosahatchee River. Major infrastructure systems failed, leaving much of the County without access to water. Power grids were destroyed on barrier islands, and severely damaged in inland areas.

The County experienced significant loss in the already strained housing stock because of the storm. More than 9,900 residential units were destroyed, and more than 13,173 residential units suffered major damage. Initial damage assessments show Ian caused more than $8 billion in damage to residential and commercial structures. It impacted every county beach, all county parks, every traffic signal, and generated an estimated 10 million cubic yards of debris, with 6 million of that collected roadside in unincorporated areas. The storm left more than 130,000 persons in need of housing assistance.

On September 28, 2022, Governor Ron DeSantis requested an expedited federal disaster declaration for Hurricane Ian. The Governor requested FEMA assistance under the Stafford Act for Individual Assistance and Public Assistance for all 67 counties, the Miccosukee Tribe of Indians of Florida, the Seminole Tribe of Florida, and Hazard Mitigation statewide.

On September 29, 2022, President Biden declared that a major disaster existed in the State of Florida. In addition to triggering emergency protective measures, the initial federal response provided funding under the Stafford Act for:

- Individual Assistance to affected individuals and households in Charlotte, Collier, DeSoto, Hardee, Hillsborough, Lee, Manatee, Pinellas, and Sarasota counties;

- Debris removal for Charlotte, Collier, DeSoto, Hardee, Hillsborough, Lee, Manatee, Pinellas, and Sarasota counties;

- Public Assistance for all 67 counties, the Miccosukee Tribe of Indians of Florida, and the Seminole Tribe of Florida; and

- Hazard Mitigation Grant Program assistance for hazard mitigation measures statewide.

The severity and magnitude of Hurricane Ian justified the need for supplemental Federal assistance prior to the completion of joint federal, state, and local government Preliminary Damage Assessments (PDAs).

The response to Hurricane Ian was multi-agency and large scale. More than nine months after the storm, recovery remains a challenge for many households and communities. Through June 2023, an official State of Local Emergency remained in effect in Lee County.

As result of Hurricane Ian and ongoing unmet recovery needs, a Congressional allocation of HUD disaster response funding through the Community Development Block Grant Disaster Recovery program was made to Lee County. On December 29, 2022, President Biden signed into law the "Consolidated Appropriations Act, 2023" (Public Law 117-328), which included $3 billion in CDBG-DR funds for major disasters that occurred in 2022.

The projects outlined within this plan were selected through an evaluation of unmet needs resulting from Hurricane Ian (FEMA – 4673 – DR) and an evaluation of risks for future disaster impacts. CDBG-DR funds will support hazard mitigation, planning, and recovery for infrastructure and housing, as well as provide public services and planning to ensure individual household and community-wide recovery and resilience.

In accordance with the Federal Register Notice (88 FR 32046) 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 the needs in the community change post-Ian. **The initial draft plan is being made available for public comment and feedback between August 1 and August 31, 2023.**

C. SUMMARY

On December 29, 2022, President Biden signed into law the "Consolidated Appropriations Act, 2023 (Public Law 117-328), which included $3 billion in CDBG-DR funds for major disasters that occurred in 2022. The U.S. Department of Housing and Urban Development (HUD) administers CDBG-DR funds, and grantees are required to submit a plan to the HUD Secretary detailing a recovery plan to address disaster needs. All funds must be allocated for disaster-related eligible activities in accordance with the applicable federal register notices, the Housing and Community Development Act of 1974, Title 24 Section 570 of the Code of Federal Regulations, and Federal Register Notice 88 FR 32046.

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. CDBG-DR allocations provide funding to develop viable communities, particularly for low- and moderate-income persons, through decent housing, a suitable living environment, and the expansion of economic opportunities. The primary objectives of this recovery Action Plan are as follows:

- Create and preserve safe, resilient, and affordable housing opportunities;
- Assist individual property owners to recover from the impacts of Hurricane Ian;
- Restore critical public facilities and infrastructure;
- Mitigate future disaster impacts through infrastructure investments;
- Deliver essential public services that support individual and community-wide recovery; and
- Plan for future resiliency.

Through the allocation process HUD identifies most impacted and distressed (MID) areas where CDBG-DR funding must be spent. For this grant, HUD identified all of Lee County as one of those areas. All funded projects and activities must be located in incorporated or unincorporated areas of Lee County, Florida. ***All CDBG-DR allocations will be available for disbursement from the Federal Treasury for approximately six years following the date of execution of the grant agreement.***

Project allocations are based on the best data currently available and reflect projections of need to support the programs. It can be anticipated there will be future adjustments based on actual experience as programs are implemented; however, neither public services, planning, nor administrative expenses will surpass their statutory caps. HUD statutory caps for CDBG-DR are as follows:
- 15% for Public Services
- 15% for Planning
- 5% for Administration

In the development of this disaster recovery Action Plan, Lee County consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive. The information gathered through town hall meetings, stakeholder consultations, public meetings,

and online public comment submissions were considered during the development of the Action Plan. Additional details regarding Citizen Participation efforts can be viewed in Section III.A.

Lee County also completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than $1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event. That assessment identified more than $8 billion in unmet needs among housing, infrastructure, and economic revitalization. More than 94 percent of the overall need is housing and infrastructure.

The unmet needs analysis identified a total housing unmet recovery need of $4,598,352,445.

FEMA real property damage estimates indicate that there are approximately 18,473 (79.87 percent) owner-occupied units and 4,655 (20.13 percent) renter-occupied units that suffered major-high or severe damage. Insurance data indicates that there are an estimated 49.08 percent of homeowners without insurance. By adding the number of renter and owner-occupied units, then dividing by the percent estimated to be uninsured, the County estimates that approximately 11,351 households may need some assistance to fully recover from Hurricane Ian. The County further estimates, based on the overall LMI population, that 4,742 (41.78 percent) of these households may be income qualified for CDBG-DR programs.

Lee County will implement the following housing recovery projects to address the unmet housing needs in Lee County:

- Affordable Multifamily Housing Development and Preservation
- Affordable Single Family Housing Development
- Individual Housing Rehabilitation, Reconstruction & Elevation – Owner and Renter Occupied
- Home Purchase Assistance
  (i.e., downpayment, closing cost, and mortgage buydown assistance)
- Voluntary Residential Buyout

The housing programs together will receive $660,000,000 of the allocated CDBG-DR funds from HUD. This represents approximately 60 percent of the CDBG-DR funds allocated to Lee County. Approximately 2,800 households will be provided assistance through the projects listed above.

The unmet needs analysis identified a total infrastructure unmet recovery need of $3,040,625,610.

The infrastructure systems affected by Hurricane Ian's widespread damage included damage to energy systems, roadways, bridges, traffic controls, water and wastewater treatment systems, septic systems, cell towers, and voice and data services. Transportation was hazardous as water and debris, including many boats, blocked roads; there were downed trees and power lines, and traffic lights were out. Both the Sanibel Causeway (see *Figure 33*) and the Matlacha Pass Bridge were severely damaged during the storm and those barrier island areas were inaccessible by car until repairs were made.

Lee County will implement the following infrastructure recovery projects to address the unmet infrastructure needs in Lee County:

- Hurricane Mitigation Grant Program Infrastructure Match Funding
- Critical Infrastructure

The infrastructure programs together will receive $352,486,950 of the allocated CDBG-DR funds from HUD. This represents approximately 32 percent of the CDBG-DR funds allocated to Lee County. Mitigation funds are included in Lee County's total infrastructure budget and will be used to support improvements to infrastructure not impacted by Hurricane Ian.

The unmet needs analysis identified a total economic unmet recovery need of $440,320,907.

Lee County has determined that the most impactful means by which to support overall economic recovery are included in 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. Consequently, an economic revitalization program could be incorporated into the Action Plan through a substantial amendment.

Lee County understands that wraparound public services and early opportunities for case management following a disaster are critical to complement housing and infrastructure activities. After Hurricane Ian, the County advertised its Coordinated Entry line as an access point for services and support for households impacted by Hurricane Ian. To date, the Coordinated Entry line has completed 2,417 unmet needs assessments and continues to receive calls daily. Through

these calls the County has identified unmet needs for case management and behavioral health services.

The County has allocated $15 million in public services to provide for case management and services navigation through the Unmet Needs Long Term Recovery group and to implement a more coordinated system for behavioral health services within the County.

The County will also allocate $25 million for planning to create resiliency and recovery plans, as well as provide opportunities for municipalities within Lee County to conduct strategic planning.

The County will utilize 5 percent of the total grant award for administration, as allowed by the Federal Register Notice.

Additional information regarding the County's current unmet needs across HUD's defined sector categories (housing, infrastructure, and economic revitalization) are detailed in the following sections:

II.B. Housing Unmet Needs
II.C. Infrastructure Unmet Needs
II.D. Economic Revitalization Unmet Needs

D. UNMET NEEDS AND PROPOSED ALLOCATION

Table 1 – Lee County's Unmet Needs and Proposed Allocation

Category	Remaining Unmet Need	% of Unmet Need
Housing	$4,598,352,445	56.92%
Infrastructure	$3,040,625,610	37.63%
Economic Revitalization	$440,320,907	5.45%
Total Unmet Needs	**$8,079,298,962**	**100%**

Category	Program Allocation Amount	% of Program Allocation
Housing	$660,000,000	59.57%
Economic Revitalization	$0	0%
Infrastructure	$207,980,950	18.77%
Mitigation	$144,506,000	13.04%
Planning	$25,000,000	2.26%
Public Services	$15,000,000	1.35%
Admin	$55,394,050	5.00%
Total Allocation	**$1,107,881,000**	**100%**

Source: Unmet needs data compiled from a variety of sources, including, but not limited to the following: FEMA, HUD, 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, Florida Division of Emergency Management (FDEM), FEMA Public Assistance (PA), FEMA Hazard Mitigation Grant Program (HMGP), Federal Highway Administration (FHWA), Lee County Recovery Task Force (RTF) , U.S. Census Bureau (Decennial Census and American Community Survey), The Vulnerability Mapping Analysis Platform (VMAP) Social Vulnerability Index (SoVI), Lee County Homeless Continuum of Care, Lee County's Hazard Identification and Risk Assessment (HIRA) & Joint Local Mitigation Strategy (LMS) Plan (Lee County Public Safety).

II. UNMET NEEDS ASSESSMENT

A. OVERVIEW

Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than $1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event. The Federal Emergency Management Agency (FEMA) declaration number for this presidentially declared disaster is DR-4673. The United States (U.S.) Department of Housing and Urban Development (HUD) identified the most impacted and distressed (MID) area for this grant is all of Lee County, Florida.

Figure 1 - The location of Lee County, FL. [1]

The needs assessment evaluates unmet needs related to housing, infrastructure, economic revitalization, planning, and mitigation. This assessment takes into consideration pre-disaster needs in addition to unmet recovery needs resulting from Hurricane Ian.

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[1] Map created by Lee County using ArcGIS software.

1. HURRICANE IAN'S IMPACT TO LEE COUNTY

Hurricane Ian originated from a tropical wave off the coast of Western Africa and moved across the central tropical Atlantic towards the Windward Islands. On September 21, 2022, it progressed though the Caribbean Sea. The storm grew and on September 23, 2022, it was designated a tropical depression, located 130 miles east-northeast of Aruba tracking to hit western Cuba heading for Florida. Ian made landfall in the U.S. in southwestern Florida as a Category 4 storm. See the Hurricane Ian track shown in *Figure 2*.
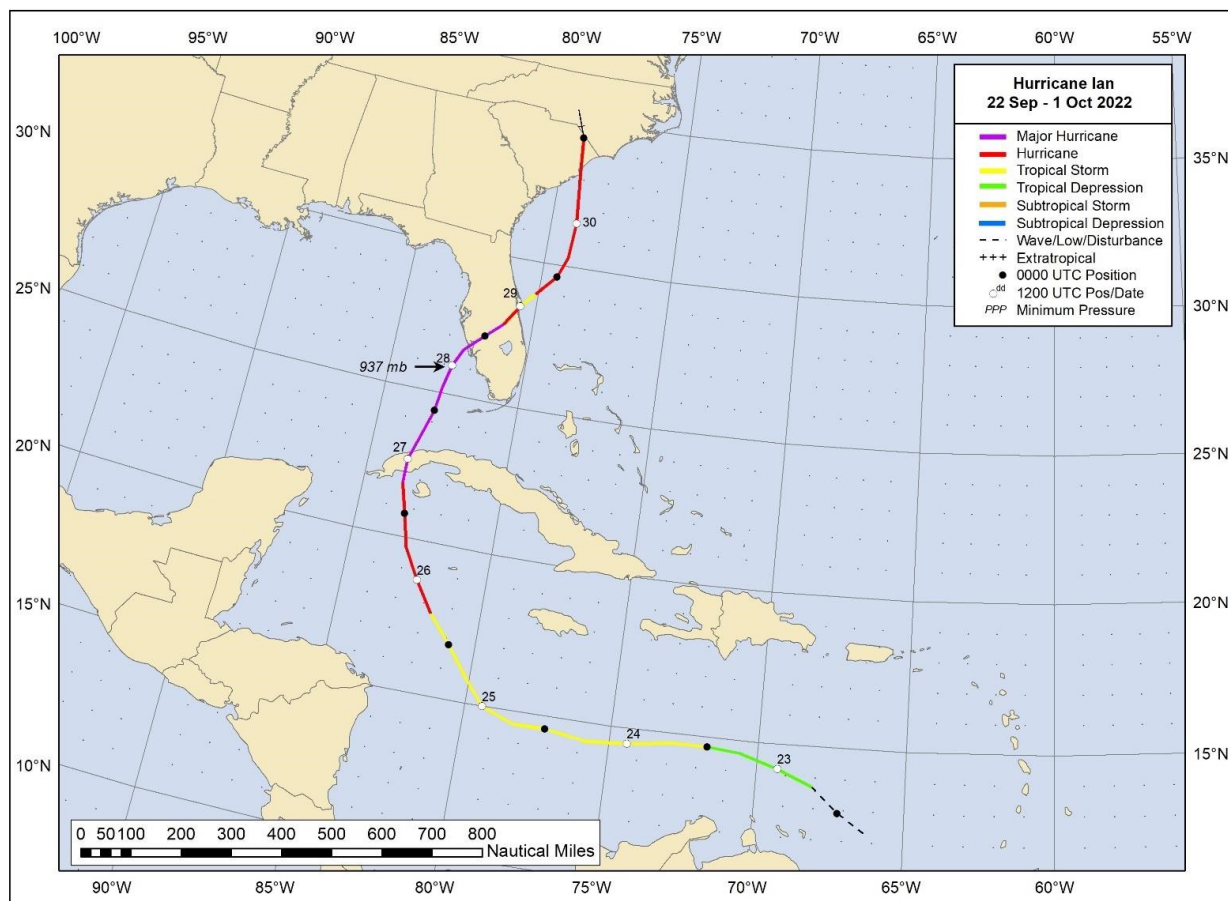
Figure 2 - The best storm track of Hurricane Ian from Sept. 23 - 30, 2022. [2]

Hurricane Ian made its initial U.S. landfall on the barrier island of Cayo Costa, in Lee County, Florida on September 28, 2022, at 3:05 p.m. Eastern Daylight Time (EDT). At the time of landfall in Lee County ("County"), the storm had been declared a major hurricane with an approximate wind speed of 150 miles per hour (MPH) and an estimated central pressure of 941 millibars (mb). Hurricane Ian produced a catastrophic storm surge in the County causing major flooding along the southwest coast of Florida, the barrier islands near Fort Myers, as well as rivers and bays such

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[2] https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf, page 41

as the Caloosahatchee River, Estero Bay, and the Imperial River. Lee County is geographically vulnerable to storm surge. The exact track of Hurricane Ian, its strong sustained winds, and large storm size contributed to widespread devastating impacts. Ian moved northeast out of Lee County across Florida and back into the Atlantic where it veered north to South Carolina and eventually dissipated as a hurricane on October 1, 2022.

STORM SURGE

Peak storm surge inundation levels of 10 to 15 feet above ground level (AGL) occurred in Fort Myers Beach and Estero Island; 9 to 13 feet AGL occurred in the eastern portion of Sanibel Island; 8 to 12 feet AGL occurred in Estero, Bonita Beach and Bonita Springs; 6 to 9 feet AGL occurred in Pine Island, Cape Coral, and other communities along the mouth of the Caloosahatchee River; and 5 to 8 feet AGL occurred in Fort Myers.[3] The range of storm surge levels throughout the Lee County area can be seen in *Figure 3*.

Fort Myers Beach and Estero experienced peak Hurricane Ian inundation levels of 10 to 15 ft AGL. A United States Geological Survey (USGS) water level sensor measured a wave-filtered water level of 12.70 ft above mean higher high water (MHHW) level at Fort Myers Beach Pier, which was the highest water level measurement from this network. Nearby, a remote camera mounted by storm chaser, Max Olson, captured the evolution of the storm surge event on Fort Myers Beach (see *Figure 4 images a through e*). The camera was located less than 0.5 miles to the east on Estero Boulevard relative to the USGS water level sensor. A timeline of images show (a) the onset of storm surge inundating the streets, (b) rapidly moving water carrying large floating debris, (c) a home in the view of the camera floating off its foundation with large waves crashing over it, (d) waves splashing over the camera, mounted approximately 12 feet above the road, and (e) receding waters revealing a barren landscape approximately 6.5 hours after the first image. These images show the destructive power of the storm surge and waves that occurred throughout the area.

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[3] https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf, page 9
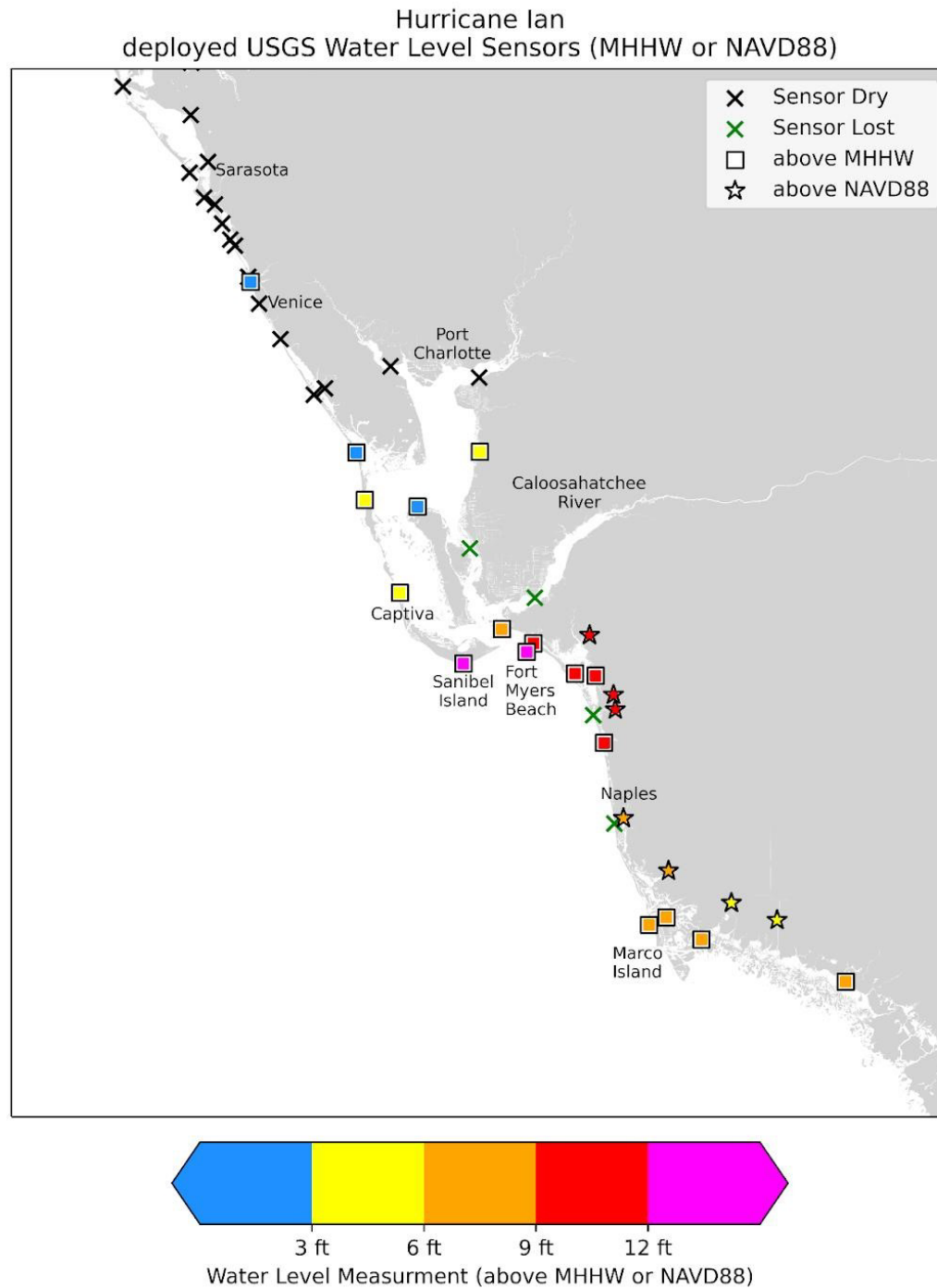
Figure 3 - Maximum wave filtered water level measurements from USGS water level sensors.[4]

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[4] https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf, page 48
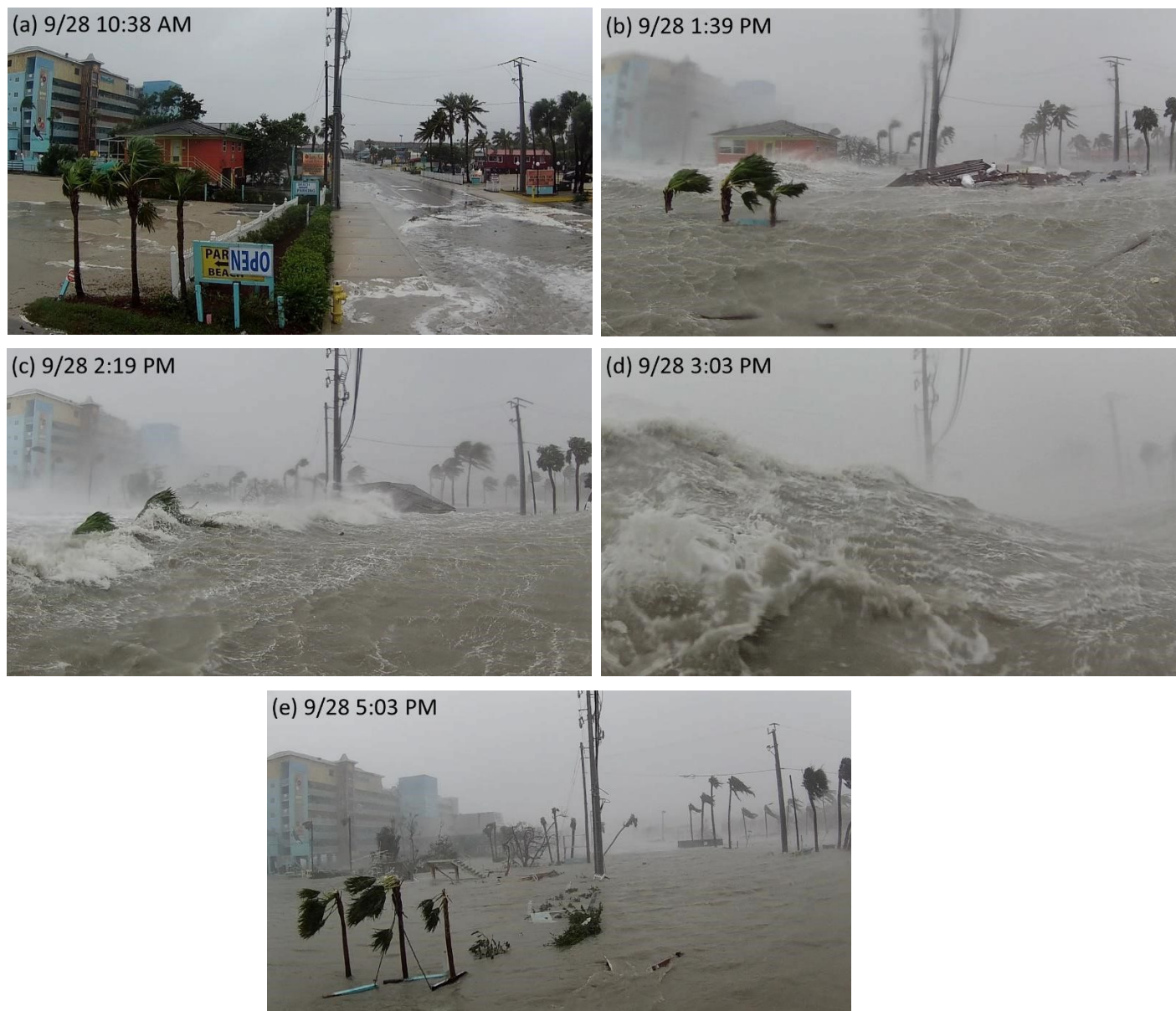
Figure 4 - (a - e)– Still images and approximate local times from a remote camera showing storm surge inundation in Fort Myers Beach. [5]

WIND IMPACTS

Hurricane Ian's path over Florida and sustained hurricane-force winds caused widespread power outages throughout southwest Florida. At 5:00 PM Eastern Daylight Time (EDT) on September 29, 2022, there were 2,624,701 customers without electricity (*Figure 5*). Southwest Florida's Electric Cooperative (LCEC), which provides electrical power to six counties in southwest Florida including Lee County, reported that over 90 percent of customers in its service area were without power.[6] Power outages lasted sixteen days; Sanibel Island, the final area without power service, was restored on October 14, 2023.
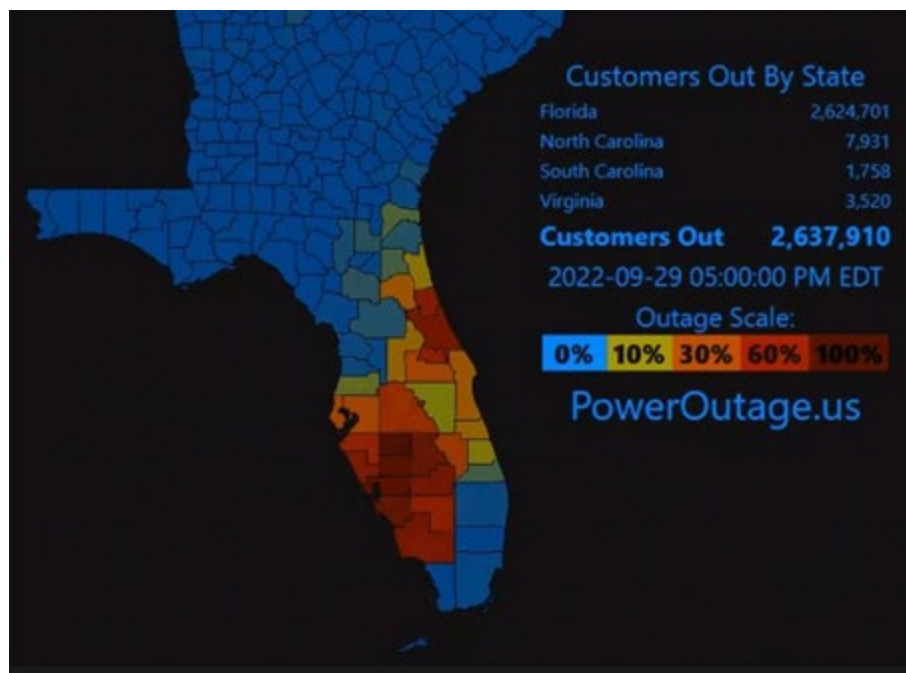
Figure 5 - Power outage map for Florida on September 29, 2022. [7]

The wind impacts also caused roof, building, and infrastructure damage to homes, businesses, and public facilities across the County, compounding to the damage caused by the historic storm surge. Ian's impact required massive debris removal efforts. As of June 28, 2023, unincorporated Lee County alone had collected 6.38 million cubic yards of debris as a result of the hurricane-force winds and storm surge. [8]

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[6] https://www.lcec.net/widespread-power-outages-damage-assessment-today
[7] https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf page 60, and https://poweroutage.us/
[8] https://ianprogress.leegov.com/pages/debris

2. PRESIDENTIAL DECLARATION

On September 29, 2022, less than 24 hours after landfall, Presidential Declaration DR-4673 was signed for the state of Florida due to the catastrophic impacts of Hurricane Ian. The incident period spanned from September 23, 2022, to November 4, 2022. *Figure 6* shows that Hurricane Ian-related U.S. Federal Emergency Management Agency (FEMA) assistance was made available to all 67 counties in Florida, demonstrating the massive direct and indirect scope and impact of Ian. Due to the major impacts in the County, assistance from both FEMA Individual Assistance (IA) and Public Assistance (PA) Programs were available to individuals and eligible entities in Lee County. [9]
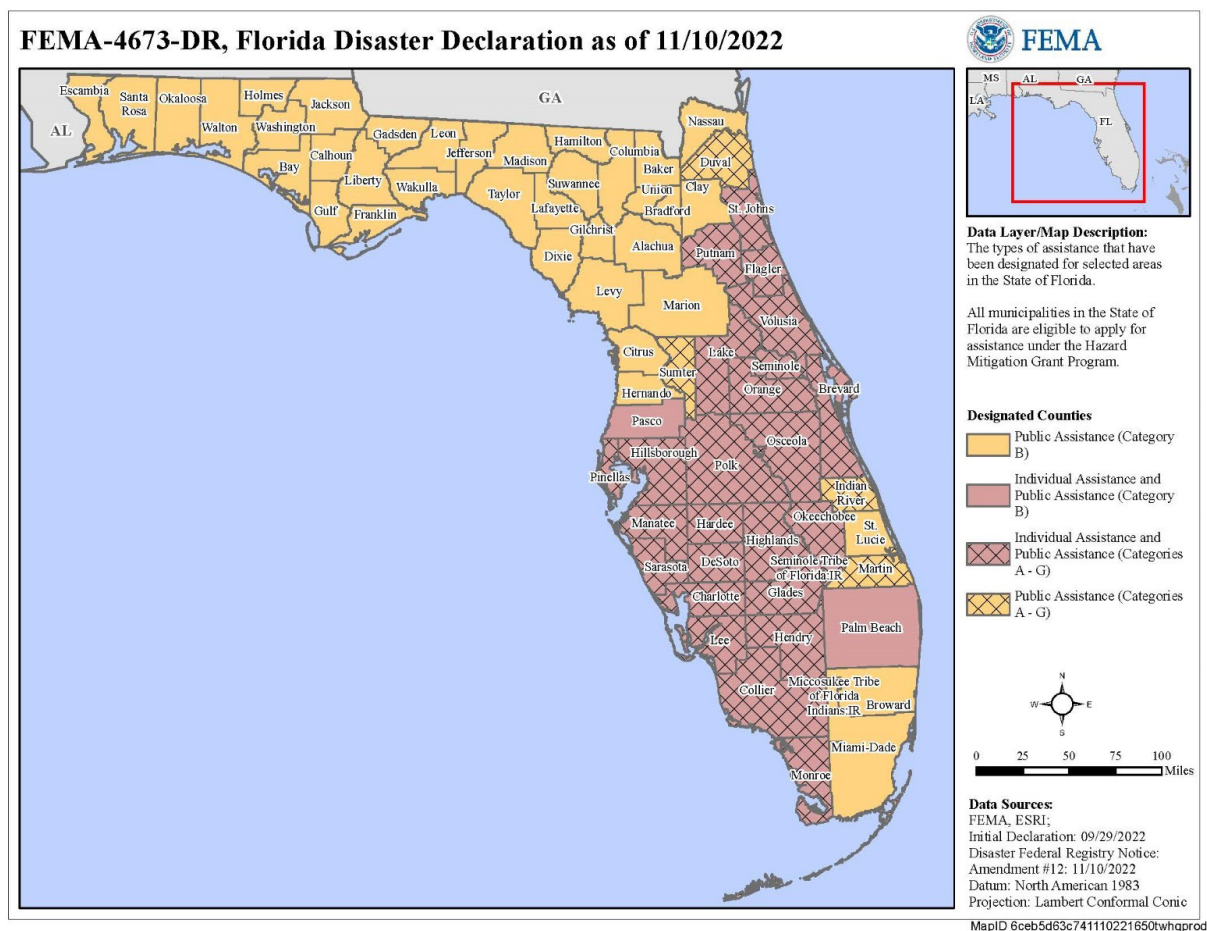
Figure 6 - Designated Counties for Presidential Disaster Declaration 4673. [10]

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[9] https://www.fema.gov/disaster/4673/designated-areas
[10] https://gis.fema.gov/maps/dec_4673.pdf

3. BACKGROUND, PROCESS, AND SUMMARY OF IMPACT AND UNMET NEEDS

The Federal Register Notice issued by HUD on May 18, 2023, at 88 FR 32046 will be referred to in this section as the May 18 Notice.

Unmet needs are calculated for each of the HUD defined sectors (housing, infrastructure, and economic revitalization) based on guidance provided by HUD in its [Federal Register Notice published on May 18, 2023 ("May 18 Notice")](#). The County followed the Federal Register Notice guidance, pages 32058 to 32059 that described 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, by accounting 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 use 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. The County's current unmet needs across HUD's defined sector categories (housing, infrastructure, and economic revitalization) are detailed in the following sections:

> II.B. Housing Unmet Needs
> II.C. Infrastructure Unmet Needs
> II.D. Economic Revitalization Unmet Needs

OVERVIEW OF DATA USED

Data sources utilized in the assessment are listed in this table and more fully described in the following pages.

Original Version: September 1, 2023

Table 2 - Data Sources Utilized in the Assessment.

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), Lee County Recovery Task Force (RTF)
Socioeconomic and Demographic Data	U.S. Census Bureau (Decennial Census and American Community Survey), The Vulnerability Mapping Analysis Platform (VMAP) Social Vulnerability Index (SoVI)
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

SUMMARY OF UNMET NEEDS METHODOLOGY BY SECTOR

Housing

To calculate the Housing unmet needs, Lee County used FEMA IA, Lee County Property Appraiser, and National Flood Insurance Program (NFIP) data to identify damaged or destroyed units, calculate the value of housing losses, and tabulate against the assistance received. An increase of 30 percent[7] 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 information regarding the methodology utilized to determine the housing unmet needs can be found in section *II.B 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 percent[11] 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 38 percent[12] 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.C. 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.D Economic Revitalization Unmet Needs*.

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[11] 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).

[12] Producer Price Index by Industry: Building Material and Supplies Dealers, April 2023, https://fred.stlouisfed.org/series/PCU44414441

Table 3 – Summary of estimated unmet needs and proposed allocation list the unmet need estimates by HUD category. It lists the proportion per category of the total estimate, the proposed HUD funding allocation per category, and proportion of HUD funding per program category.

Category	Unmet Need	Percent of Total Unmet Need
Housing	$4,598,352,445	56.92%
Infrastructure	$3,040,625,610	37.63%
Economic	$440,320,907	5.45%
Total	**$8,079,298,962**	**100%**

B. HOUSING UNMET NEED

The following section describes the losses and unmet needs related to Hurricane Ian's impact on housing in Lee County.

The unmet needs analysis identified a total housing unmet recovery need of $4,598,352,445.

FEMA real property damage estimates indicate that there are approximately 18,473 (79.87 percent) owner-occupied units and 4,655 (20.13 percent) renter-occupied units that suffered major-high or severe damage. Insurance data indicate that there are an estimated 49.08% of homeowners without insurance. By adding the number of renter and owner-occupied units, then multiplying by the percent estimated to be uninsured, the County estimates that approximately 11,351 households may need some assistance to fully recover from Hurricane Ian. The County further estimates, based on the overall LMI population, that 4,742 (41.78 percent) of these households may be income qualified for CDBG-DR programs.

Lee County will implement the following housing recovery projects to address the unmet housing need in Lee County:
- Single Family Housing Repair, Reconstruction, and Elevation
- Multi-Family and Rental Housing Repair, Rehabilitation, and Reconstruction
- New Construction of Affordable Housing Units
- Voluntary Residential Buyouts and Relocation Assistance
- Home Purchase Assistance (i.e., downpayment, closing cost, and mortgage buydown assistance)

The housing programs together will receive $660,000,000 of the allocated CDBG-DR funds from HUD. This represents approximately 60 percent of the CDBG-DR unmet needs funds allocated to Lee County. Approximately 2,800 households will be provided assistance through the projects listed above. Housing created or preserved through CDBG-DR funds will be promoted to LMI populations through direct outreach and wide-spread marketing.

Lee County encourages developers to provide the Lee County Homeless Continuum of Care first access to submit rental applications for new housing units. If utilized, this direct referral process facilitates housing opportunity for persons experiencing homelessness through prioritized access to new affordable housing units.

LIMITATIONS OF DATA
A single data source does not provide sufficient accurate information, so multiple sources were used to understand the full extent of needs in Lee County following Hurricane Ian. It is important to note that the data in this assessment reflects the best available data as of July 2023, and it captures 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 Loss[13] 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 analysis consistent with the unmet needs calculation outlined in the May 18 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 utilized the June 16, 2023, insurance data made available by the Florida Office of Insurance Regulation (FOIR) for Lee County. FOIR didn't

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[13] https://www.fema.gov/press-release/20230425/understanding-fema-verified-loss-0

provide the direct incurred losses. Lee County has estimated the Direct Incurred Losses value by taking the total estimated insured losses for the State, then dividing by the open and closed paid claims to get an average paid claim. The average paid claim was then multiplied by the number of open and closed paid claims for Lee County.

- **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."[14]

- **Vulnerability Mapping and Analysis Platform (VMAP):** VMAP is a system designed to streamline complex geospatial and statistical analysis for social, medical, and environmental vulnerability. VMAP implements current and historical methods for determining social vulnerability at various levels of geography for the entire nation. VMAP's Social Vulnerability Mapping Tool allows registered users to create tract level SoVI maps at the State, County, City, Congressional District, and Watershed level or regions otherwise defined by the user. Future versions of VMAP will allow users to apply a variety of social vulnerability models in addition to the SoVI model (CDC-SVI, Georgetown Model).[15]

- **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.[16]

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[14] 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

[15] https://www.vulnerabilitymap.org/

[16] 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

- **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 low (50 percent of area median income) income limit, extremely low income, and low (80 percent of area median income)[17] 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 limits responses with damage levels or unmet needs information.

1. DISASTER DAMAGE AND IMPACTS

> Hurricane Ian destroyed over 9,900 homes in Lee County and at least 13,000 units suffered serious damage. This unprecedented level of damage rendered a significant number of the County's housing uninhabitable post-storm, with an additional 24,000 units having suffered lesser levels of damage. At the same time, Ian made approximately 40 percent of the county's hotel/motel rooms uninhabitable as well. Addressing this extensive loss of housing units and options will be a focus for the County in its use of CDBG-DR funding.

HOUSING SITUATION IN LEE COUNTY

The 2020 Census profile for Lee County indicates an overall population of 760,822 individuals.[18] Current U.S. Census Bureau data[19] estimates an overall population of 822,453 individuals for 2022. The median household income is approximately $66,256 and approximately 50.6 percent of the population is employed. There are approximately 20,054 businesses in the County and 416,332 housing units. Approximately 18.2 percent of the population speak Spanish at home and 173,161 individuals are of Hispanic or Latino ethnicity.

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[17] 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.

[18] https://www.census.gov/quickfacts/leecountyflorida

[19] https://www.census.gov/quickfacts/fact/table/leecountyflorida,US/PST045222

As stated in the 2019 to 2023 Consolidated Plan,[20] the County was in the midst of a severe affordable housing crisis prior to Hurricane Ian. Cost burden and lack of affordable housing were identified as the most critical housing issues faced by the County. At the time, more than 37,000 households had rent and other expenses exceeding 50 percent of the household income. Of these households, approximately 43 percent fell within the 0-30 percent AMI category.

The Lee County Homeless Continuum of Care identified significant need for affordable units for households with more than five members and for single person households. Modernizing the existing housing stock was also presented as a critical need. The County recognizes that housing cost burden is typically increased for those with lower income; the lower the income, the larger percentage of a household's income is allotted to housing costs.[19]

Beginning in March 2020, the COVID-19 pandemic had specific impacts on the County. A public survey found that, in addition to new healthcare, mental health, and public health problems associated with COVID-19, an overwhelming majority of the respondents stated they needed household assistance to pay for rent, utilities, food, and other bills due to reduced work hours or unemployment.

COVID-19 brought significant income losses and massive in-migration population boom to the County. Immediately following the start of the COVID-19 pandemic, the County experienced a slight downturn in tourism. This, however, quickly changed and the County experienced an influx of individuals, not only to visit, but to set up permanent residency. This resulted in a housing market unable to keep up with the demand. The County saw availability and costs of housing increase, leaving individuals struggling to find housing. Census data indicates that more than 14 percent of Lee County's population relocated to the County in the last year. An estimated 6.8 percent of the population moved into Lee County from another county, state, or country. Approximately 31 percent of the housing units in Lee County are occupied by a household that moved into Lee County in 2019 or later. More than 21 percent of these households are living in rental units, as opposed to just 8.7 percent in owner-occupied housing units.

Unprecedented local growth paired with rising inflation across the nation, exacerbated the housing cost burden that many low-income families were already experiencing. As the community emerged from the pandemic and inflation continued to rise nation-wide, the economic impacts of households with incomes at or below 80 percent of the area median income

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[20] https://www.leegov.com/dhs/Documents/Planning/Final%20Draft%20for%20Public%20Comment.pdf

were significant. In the past two years, Lee County jumped to the ninth fastest growing county in the U.S., creating significant strain on the already limited housing market.[21]

In January 2022, a tornado ripped through the County destroying 74 homes, with an additional 61 sustaining major damage, and 58 sustaining minor damage. One hundred more homes were impacted but were in livable condition. Just as replacement trailers were being installed at the Tropicana Mobile Home Park, Hurricane Ian made landfall in the County and these replacement housing units were destroyed. These catastrophic damages compounded an already fragile housing market in the County.

With the cascading impacts of COVID-19, tornadoes, and Hurricane Ian, housing needs in Lee County will continue to evolve in the coming years. *Figure 7* below shows the median house value in the County by census tract. Areas with the highest median house values are found along the Gulf coast on Sanibel Island, Fort Myers Beach, and Estero. The lowest median house values are found in northeast Cape Coral, northwest Pine Island, Fort Myers, and Lehigh Acres.

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[21] https://www.gulfshorebusiness.com/gb_daily/lee-among-10-fastest-growing-counties-in-the-u-s/
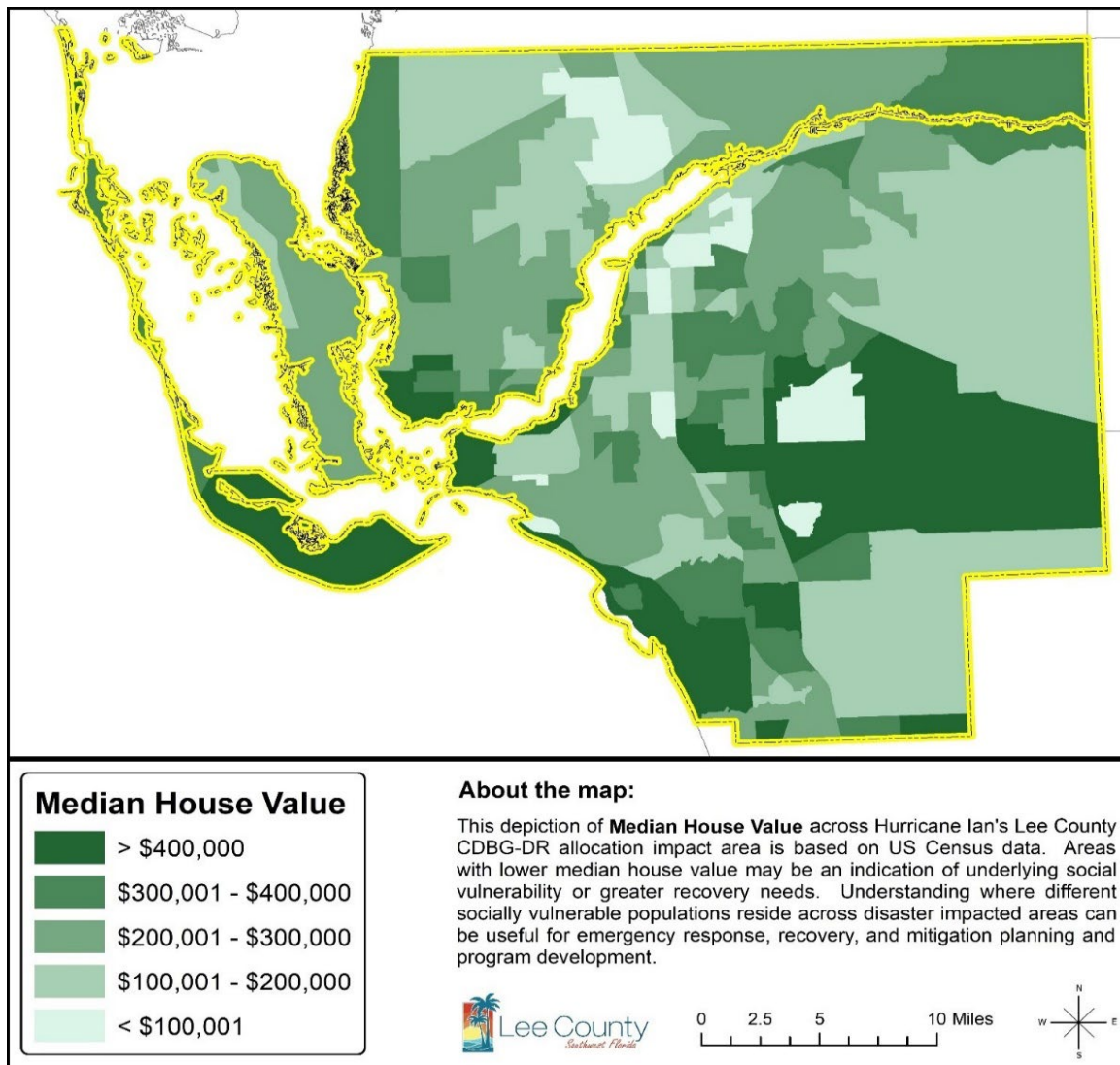
Figure 7 – A map of median house values in Lee County, FL. [22]

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2. SINGLE FAMILY V. MULTI-FAMILY NEEDS (OWNER-OCCUPIED V. TENANT)

Affordability

High housing costs can impact the amount of money households are able to save or use for essential and nonessential expenses. Recognizing the affordability issues for renters and owners within the County, Comprehensive Housing Affordability Strategy (CHAS) data has been analyzed to determine the extent of local affordability issues based on the best-available data while developing this assessment. Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. CHAS data demonstrates the extent of housing problems and housing needs, particularly for low-income households.

Demonstrating the scale of households with high housing costs, *Table 4* provides an overview of the housing cost burden for owners and renters within Lee County. CHAS data defines cost burden as "the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is 'select monthly owner costs,' which includes mortgage payment, utilities, association fees, insurance, and real estate taxes."

Lee County renters experience cost burden at higher rates than owners. Approximately 25.01 percent of renters are paying more than 50 percent of their total household income toward rent, compared to only 10.17 percent of owners. Providing more affordable rental units through new construction may help to reduce the percent of renters who are severely cost burdened. Providing home purchase assistance may also assist to transition some renters to owners, which, as demonstrated in *Table 4,* tend to have lower overall housing cost burden.

Table 4 - The housing cost burden overview of owners and renters within Lee County.

Housing Cost Burden Overview	Owner	Renter	Total
Cost Burden ≤ 30%	149,810 (75.06%)	38,015 (49.77%)	187,825
Cost Burden >30% to ≤ 50%	26,220 (13.14%)	17,270 (22.61%)	43,490
Cost Burden > 50%	20,295 (10.17%)	19,100 (25.01%)	39,395
Cost Burden not available	3,270 (1.64%)	1,990 (2.61%)	5,260
Total	**199,590**	**76,375**	**275,965**

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2015-2019 ACS 5-year estimates[23]

Figure 8 and *Figure 9* provide illustrations of housing cost burdened and rent burdened populations by census tract. HUD and ACS data define housing cost burdened populations as

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[23] https://www.huduser.gov/portal/datasets/cp.html#query_2006-2019

households spending more than 30 percent of their income on housing costs. Similarly, rent burdened populations are defined as renters that spend more than 30 percent of their income on rent costs. Areas with the highest percentage of cost burdened households include Fort Myers, North Fort Myers, Cape Coral, and Lehigh Acres. Areas with the highest percentage of rent burdened populations include Fort Myers, North Fort Myers, Cape Coral, Lehigh Acres, and Bonita Springs.

Housing Cost Burdened Populations

- > 50%
- 40.1% - 50%
- 30.1% - 40%
- 20.1% - 30%
- < 20.1%

About the map:

This depiction of **Housing Cost Burdened Populations** across Hurricane Ian's Lee County CDBG-DR allocation impact area is based on US Census data. Areas where people are housing cost burdened (Spending more than 30% of their income on housing costs) may be an indication of underlying social vulnerability or greater recovery needs. Understanding where different socially vulnerable populations reside across disaster impacted areas can be useful for emergency response, recovery, and mitigation planning and program development.

0   2.5   5   10 Miles

Figure 8 - A map of housing cost burdened populations within Lee County. [24]

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[24] Map generated from Census ACS 2016-2020 table: B25106: TENURE BY HOUSING COSTS AS ... - Census Bureau Tables tract level data for Lee County
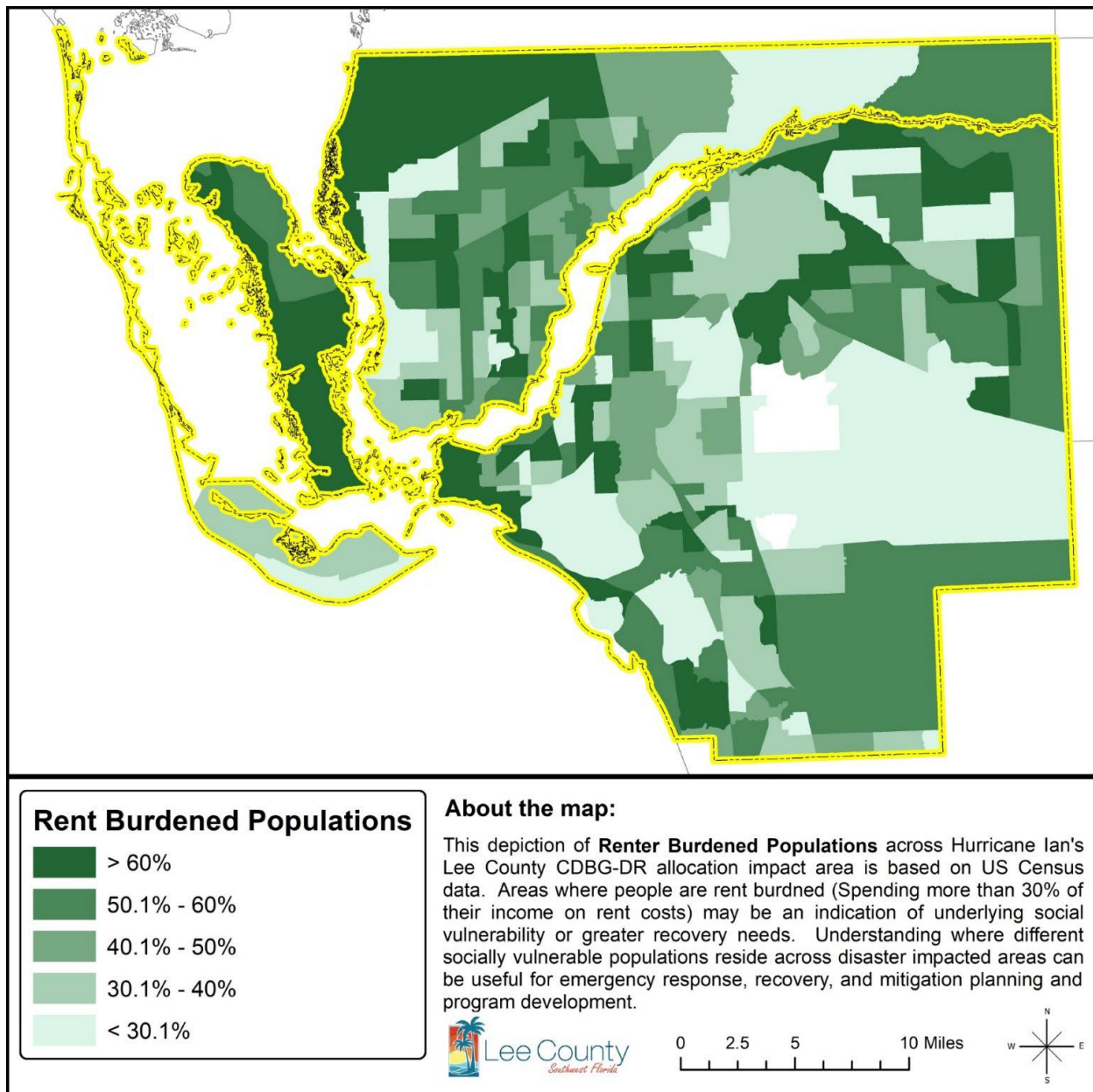
Figure 9 - A map of renter burdened populations within Lee County. [25]

Table 5 demonstrates the extent of affordability issues for renters within the County by providing a comparison of the 2023 HUD HOME Program Fair Market Rent values and real median rent calculated by the Regional Economic Research Institute at Florida Gulf Coast University to determine the real median rent as of Q2 2023.

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[25] Map generated from Census ACS 2016-2020 table: B25106: TENURE BY HOUSING COSTS AS ... - Census Bureau Tables tract level data for Lee County

Median rent for a 2-bedroom unit is 57.8 percent, or $840, more per month than the fair market rent value provided by HUD. A household of four with an income at 80 percent of the area median income would pay just over 40 percent of their income toward rent each month if paying the real median rental rate.

Table 5 – A 2023 HOME Fair Market Rent and Real Median Rent Comparison.

County	2023 HOME Program Fair Market Rent (2-bedroom)[26]	2023 Real Median Rent (2-bedroom)[27]	% Above HOME Fair Market Rent
Lee County	$1,451	$2,291	57.89%

Source: 2023 HOME Program Rents and Regional Economic Research Institute at Florida Gulf Coast University, 2023 Q2 Real Estate Report Southwest Florida.

Table 6 provides a 5-year overview of the per unit cost at the two public housing authorities in Lee County. Dating back to 2017 (*Table 6* only covers a 5-year period), individuals with housing choice vouchers at both public housing authorities have seen these units become less affordable year after year due to annual increases in the per unit cost.[28] A cumulative comparison of all of the public housing authorities in Florida shows that the Housing Authority of Lee County has seen the fourth highest per unit cost percentage increase over a 5-year period (2018-2022) in the state. The 2023 per unit cost for the Lee County Housing Authority is currently $891.36 and the 2023 per unit cost for the Housing Authority of the City of Fort Myers is $829.46.[29]

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[26] 2023 HOME Program Rents: https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_RentLimits_State_FL_2023.pdf

[27] Regional Economic Research Institute at Florida Gulf Coast University, 2023 Q2 Real Estate Report Southwest Florida: https://www.fgcu.edu/cob/reri/files/rer/swfl-real-estate-2023q2.pdf, page 38

[28] https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

[29] https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

Table 6 – The housing choice voucher per unit cost (PUC) by year.

Public Housing Authority	2018	2019	2020	2021	2022	5-Year % Change PUC
Lee County Housing Authority	$619.84	$698.84	$758.13	$771.23	$813.77	50.26%
Housing Authority of the City of Fort Myers	$602.11	$639.80	$683.93	$743.59	$785.33	42.21%

Source: U.S. HUD Housing Choice Voucher (HCV) Data Dashboard, March 2023[30]

In accordance with HUD guidance, the County defines affordable rent as the lesser of:

- The fair market rent for existing housing for comparable units in the area, as established by HUD under 24 CFR 888.111; or

- A rental that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the Area Median Income (AMI), as determined by HUD, with adjustments for number of bedrooms in the unit. The HUD HOME Investment Partnerships Program rent limits will include average occupancy per unit and adjusted income assumptions.

Fair Market Rents are established by HUD each year for the Section 8 Program. For more information on the annual calculation of Fair Market Rents, visit the Fair Market Rents page.

Lee County will use the affordability standards outlined in the Resale and Recapture in section *IV.H Resale and Recapture*. Affordability restrictions will be enforced via deed restrictions, covenants, or other similar mechanisms and/or instruments.

Figure 10 shows the percentage of renters in Lee County by census tract. The greatest percentage of renters are concentrated near downtown Fort Myers, northeast Cape Coral, Lehigh Acres, and outside of Fort Myers Beach. The high concentration of renters in the floodplain near downtown Fort Myers and outside of Fort Myers Beach remain at risk for future flood and/or storm surge threats. Producing new, affordable units through the CDBG-DR program outside of the floodplain and ensuring that any newly constructed or rehabilitated housing units are properly elevated will provide lower risk and more affordable housing to both renters and owners. Adding affordability

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[30] https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

requirements will guarantee that rental and new owner-occupied housing remains affordable to residents of Lee County.
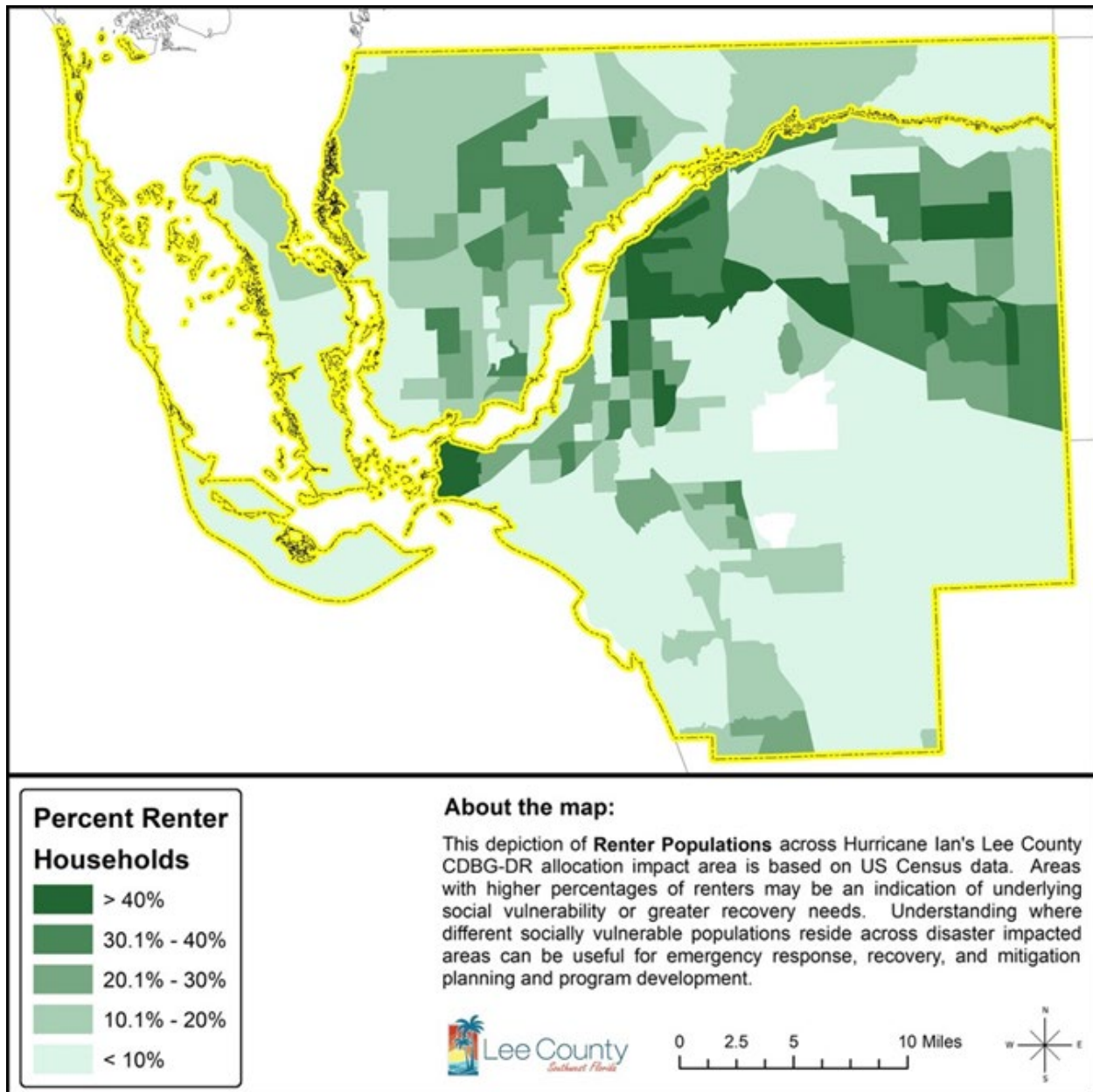
Figure 10 - The percent of renter households. [31]

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a. FEMA Individual Assistance

The FEMA IA Program is the primary basis for establishing housing unmet recovery needs for CDBG-DR grantees. The data limitations noted above are compounded due to the voluntary nature of FEMA applications. Residents must voluntarily register with FEMA for assistance after a disaster, this often leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, FEMA IA remains the best data source for identifying individual and household disaster unmet needs for housing recovery. The following section provides an overview of the County's housing impacts as a result of Hurricane Ian. In Lee County, a total of 193,934 households registered for FEMA IA assistance, including 125,255 owner-occupied households and 68,679 rental households.[32]

The May 18 Notice outlines the following damage categories by owner-occupied and rental units:

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 Inspected Rental Units
- **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.

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[32]https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

- **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.

The following tables (*Table 7, Table 8, Table 9, Table 10, and Table 11*) provide a breakdown of FEMA IA applicants by owner-occupied applicants, tenants, applicants by housing type, owner-occupied real property by HUD damage category, and rental units by HUD damage category. *Note*: The maximum amount available to a household under the FEMA IA program for Hurricane Ian was $37,900 and this amount varied based on the degree of damage or loss.

> *The most impacted populations were owner-occupied (64.59 percent of total applicants) and single-family and duplex housing (66.26 percent of all units damaged).*

Owner-occupied units in Lee County were significantly impacted by Hurricane Ian-related storm surge, wind, and localized flooding. While total FEMA IA registrations show the widespread impact of Hurricane Ian in Lee County, FEMA Verified Loss provides a more accurate understanding of households that were inspected by FEMA for a documented loss related to the disaster. For owner-occupied units, 32,889 of the 43,939 inspected properties were verified as damaged. Lee County's FEMA's total verified loss for owner-occupied units is $937,171,307 with the average loss of $29,110 per unit.

Table 7 - The FEMA IA owner-occupied overview.

County	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Lee County	125,255	43,939	32,194	23,889	$937,171,307	$29,110

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of 5/9/2023[33]

Table 8 - The FEMA IA tenants overview.

County	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Amount
Lee County	68,679	25,807	10,549	3,542	$38,218,553	$3,622.96

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of 5/9/2023[34]

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[33] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1
[34] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

Table 9 shows FEMA IA applicants by housing type. The highest number of applicants came from housing/duplex units (128,853), apartment units (21,150), condo units (13,596), and mobile home units (20,452).

Table 9 – The FEMA IA applicants by housing type.

Residence Type	# of Applicants	% Owner-Occupied	% Tenants	% Unknown	% Type
Apartment	21,150	0.11%	99.80%	0.09%	10.88%
Assisted Living Facility	142	0.70%	98.59%	0.70%	0.07%
Boat	486	76.54%	22.84%	0.62%	0.25%
College Dorm	33	0.00%	96.97%	3.03%	0.02%
Condo	13,596	78.58%	20.92%	0.50%	6.99%
Correctional Facility	15	0.00%	100.00%	0.00%	0.01%
House/Duplex	128,853	71.04%	28.77%	0.19%	66.26%
Military Housing	13	7.69%	92.31%	0.00%	0.01%
Mobile Home	20,452	84.80%	14.49%	0.71%	10.52%
Other	5,358	47.80%	51.34%	0.86%	2.76%
Townhouse	3,191	59.82%	40.08%	0.09%	1.64%
Travel Trailer	1,177	69.58%	29.91%	0.51%	0.61%
Total	**194,466**	**64.41%**	**35.32%**	**0.27%**	**100.00%**

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of 5/9/2023.[35]

Table 10 – The FEMA Real Property Damage Owner-Occupied Units.

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Lee County	7,941	3,165	6,855	9,199	9,284

Source: Value added data created from Open FEMA Individual Assistance Valid Registrants V1 as of 5/9/2023 when combined with HUD Income limit data.[36]

Rental units by HUD damaged category are shown in Table 11. Through FEMA IA, renters are eligible to apply for monthly rental assistance and to replace damaged or destroyed personal property. FEMA does not inspect rental properties for real property damage, so the damage estimate of the rental units is based on the HUD-defined personal property amount by damage category.

[35] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1
[36] https://www.huduser.gov/portal/datasets/il.html

Table 11 - FEMA Real Property Damage Rental Units.

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Lee County	2,804	28	3.263	3,948	707

Source: Value added data created from Open FEMA Individual Assistance Valid Registrants V1 as of 5/9/2023 when combined with HUD Income limit data.

b. Insurance

Table 12 shows the number of FEMA IA registered households in Lee County without flood insurance. This information is categorized on the basis of annual income. The high number of FEMA IA registrants without flood insurance suggests that Lee County is underinsured for flood events caused by Hurricane Ian, thereby creating a significant demand for financial resources for housing recovery. Households with an income below $15,000 represent the greatest percentage without flood insurance at 94 percent.

Table 12 – The number of households without flood insurance.

Income Category	County	Number without Flood Insurance	Percentage without Flood Insurance
No Stated Income	Lee County	35,708	82.19%
<$15,000	Lee County	12,445	94.32%
$15,000-$30,000	Lee County	27,371	91.22%
$30,001-$60,000	Lee County	43,688	85.56%
$60,001-$120,000	Lee County	28,577	73.12%
$120,001-$175,000	Lee County	5,598	57.95%
>$175,000	Lee County	3,777	47.14%
Total	**Lee County**	**157,164**	**80.82%**

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of 5/9/2023. [37]

The Florida Office of Insurance Regulation (OIR) provided data on the number of claims and claims resulting in loss for Lee County in *Table 13*. Of the 263,285 insurance claims filed for damage in Lee County, a total of 198,162 successful claims have been paid as of June 16, 2023, a success rate of approximately 75 percent.

Of the 263,285 claims filed, 11,743, approximately 4 percent, remain open without payment and 53,380, approximately 20 percent, have been closed without payment. This represents a total of 65,123[38], approximately 25 percent, of homeowners with insurance that have remaining unmet needs as their claims remain open without payment or have been closed without payment. Although the total value of losses paid by insurance is significant, the only other disaster-related

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[37] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1
[38] https://www.floir.com/home/ian

assistance for homeowners with failed insurance claims are FEMA IA and SBA. SBA loans can be a cost burden for low- and moderate-income populations. SBA loan efforts in Lee County have only resulted in 10,026 approved applications.

Table 13 - The insurance claims and losses in disaster impacted areas.

County	# of Claims	# of Claims Resulting in Loss	Direct Incurred Losses ($)
Lee County	263,285	198,162	$2,396,970,949*

Source: FOIR Hurricane Ian Information [39]
*Note: FOIR didn't provide the direct incurred losses. Lee County has estimated the Direct Incurred Losses($) value by taking the total estimated insured losses for the State dividing by the open and closed paid claims to get an average paid claim. Then multiplied the average paid claim by the number of open and closed paid claims for Lee County.

Table 14 shows the number of households that registered for FEMA IA without homeowners insurance by income in the County. Approximately 78 percent of those that have income less than $15,000 do not have homeowners insurance. The data reflects that almost half of Lee County households that applied for FEMA IA are without homeowners insurance, suggesting that individuals are underinsured, and unmet needs are significant.

Table 14 - The number of units without homeowners insurance.

Income Category	County	Number without Homeowners Insurance	Percentage without Homeowners Insurance
No Stated Income	Lee County	35,708	58.58%
<$15,000	Lee County	12,445	77.60%
$15,000-$30,000	Lee County	27,371	65.87%
$30,001-$60,000	Lee County	43,688	50.64%
$60,001-$120,000	Lee County	28,577	29.38%
$120,001-$175,000	Lee County	5,598	15.84%
>$175,000	Lee County	3,777	13.93%
Total	Lee County	157,164	49.08%

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of 5/9/2023. [40]

Those with an income less than $15,000 have both the highest percentage without flood insurance and without homeowners insurance. This highlights that a significant vulnerable population does not have the financial resources to recover.

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[39] https://www.floir.com/home/ian
[40] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

c. SBA Loans

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 on these loans are negotiated between the borrower and the lender but are subject to SBA interest rate maximums[41]. As of the most recent SBA data update on June 18, 2023, the SBA has received 26,085 SBA home loan applications from property owners in Lee County and 10,026 have been approved (see *Table 15)*. The average disbursement amount for SBA loans, as of June 18, 2023, was $35,229.07 based on applicants that received a disbursement.

Table 15 - The total home loans approved by SBA.

County	# of Approved Loan Applications	Average Disbursement Amount
Lee County	10,026	$35,229.07

Source: SBA to Lee County (updated on June 18, 2023) [42]

d. Summary of Housing Impacts

FEMA IA, Lee County Property Appraiser, and NFIP were the primary data sources that Lee County used to determine housing unmet needs. In Table 16 below, 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.

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

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[41] https://www.sba.gov/partners/lenders/7a-loan-program/terms-conditions-eligibility#id-interest-rates
[42] Data for SBA Home Loans provided by SBA to Lee County (updated on June 18, 2023)

average building values were calculated for each home type using 2023 Lee County Property Appraiser data[43]:

- Single Family = $277,696 (average of 249,256 units)
- Condo/Apartment = $335,171 (average of 95,590 units)
- Mobile Home (MHUs) = $71,200 (average of 16,443 units)

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 $277,696. 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 2023 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.

Next, the total value of NFIP claims in Lee County ($2.3 billion) was added to the estimated total loss of FEMA IA applicants ($3.2 billion) to get a total housing loss of $5.5 billion. To obtain the true cost of housing replacement, given increased cost of code compliance and resiliency measures to make buildings more resilient to future disasters, an additional 30 percent[44] was added to the total housing loss for a total housing loss with resilience of $7.2 billion.

Table 16 - A summary of housing losses.

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)	10,745	$527.97	FEMA IA Value of Real Property Damage	$5,673,044
Minor-High Damage to FEMA IA Applicants (All Home Types)	3,193	$3,782.48	FEMA IA Value of Real Property Damage	$12,077,464

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[43] https://www.leepa.org/
[44] FR–5696–N–06, page 69113

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)	10,118	$6,331.06	FEMA IA Value of Real Property Damage	$64,057,699
Major-High Damage to FEMA IA Applicants (Houses)	7,191	$138,963.00	Lee County Appraiser 50% of Average Building Value	$999,282,933
Major-High Damage to FEMA IA Applicants (Condos/Apartments)	2,192	$167,585.50	Lee County Assessor 50% of Average Building Value	$367,347,416
Major-High Damage to FEMA IA Applicants (MHUs)	3,545	$35,600.00	Lee County Assessor 50% of Average Building Value	$126,202,000
Major-High Damage to FEMA IA Applicants (All Other Types)	219	$9,098.61	FEMA IA Value of Real Property Damage	$1,992,595
Severe Damage to FEMA IA Applicants (Houses)	5,836	$208,444.50	Lee County Assessor 75% of Average Building Value	$1,216,482,102
Severe Damage to FEMA IA Applicants (Condos/Apartments)	1,013	$251,378.25	Lee County Assessor 75% of Average Building Value	$254,646,167
Severe Damage to FEMA IA Applicants (MHUs)	2,899	$53,400.00	Lee County Assessor 75% of Average Building Value	$154,806,600
Severe Damage to FEMA IA Applicants (All Other Types)	243	$78,005.71	FEMA IA Value of Real Property Damage	$18,955,144
FEMA IA Applicant Damage Subtotal	**47,194**	-	-	**$3,221,523,164**
NFIP Identified Damages/Payments	21,331	$109,973	NFIP Claims	$2,345,824,436
Total Housing Loss	-	-	-	**$5,567,347,600**
Total Housing Loss (including 30% resilience for rebuilding to higher standards)	-	-	-	**$7,237,551,881**

To ensure that housing repair assistance gets factored into the housing unmet needs calculation, FEMA IA payments to repair homes and NFIP building payments were added together to get the total housing assistance received ($293 million + $2.3 billion = $2.6 billion). See *Table 17* for the calculation.

Table 17- A summary of housing assistance.

Data	Count	Average Assistance Received	Estimated Total Loss
FEMA IA Payments to Repair Homes	17,622	-	$293,374,999
NFIP Identified Damages/Payments	21,331	$109,973	$2,345,824,436
Total Housing Assistance	-	-	**$2,639,199,435**

The Total Housing Assistance ($2.6 billion) was subtracted from the total housing unmet needs with resilience included ($7.2 billion) in *Table 18* to get $4.5 billion, which provides the total housing unmet needs for Lee County as a result of the Hurricane Ian disaster.

Table 18 - Total Housing Unmet Need.

Data	Estimated Total Loss
Total Housing Losses	$7,237,551,880
Total Housing Assistance	$2,639,199,435
Total Housing Unmet Need	**$4,598,352,445**

The data used in this analysis was the best available data at the time of completion.

3. PUBLIC HOUSING AND AFFORDABLE HOUSING

a) MULTIFAMILY ASSISTED HOUSING

Lee County has a total of 67 assisted affordable housing properties, equaling approximately 6,539 units, 6,095 of which are assisted. Twelve properties, 1,121 units, are Public Housing operated[45] and included in the needs discussed in this section. The remaining units are owned or operated by other affordable housing developers or non-profit organizations. The County sent direct emails to other HUD assisted unit owners and management and received limited response. The local permanent supportive housing provider shared detailed information regarding damages and unmet needs. Approximately 20 buildings (80 units) of scattered site permanent supportive housing (PSH) units in Lee County received roof damage as a result of Hurricane Ian. A 95-unit development, completed in 2021, experienced minimal structural or roof damage, but lack of backup power and access to water created significant health and life-safety risks for the vulnerable and disabled populations that were unable to evacuate. The PSH provider indicated unmet needs of $2,741,327 to make necessary repairs and complete hardening improvements to make all properties more resilient.

b) PUBLIC HOUSING AUTHORITIES DAMAGED

The County also consulted the Public Housing Authorities (PHAs) via email and an in-person meeting while developing this Action Plan. As defined by HUD, a PHA includes any state, county, municipality, or other governmental entity, public body, agency, or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937. For the purposes of this unmet needs assessment, the County requested the number of units that sustained Hurricane Ian damage and the current status of the damaged units.

There are two housing authorities in Lee County: The Housing Authority of the City of Fort Myers and the Lee County Housing Authority. Both housing authorities reported that their units received damage.

Many of the properties owned and managed by the Housing Authority of the City of Fort Myers (HACFM) developed post-storm water intrusion issues which led to microbial growth in many of the units occupied by the most vulnerable residents in the City of Fort Myers. HACFM immediately installed temporary tarps on the roofs of properties to mitigate further damage to the units, but the temporary roofs exceeded their life expectancy and contributed to new

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[45] http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory/results?name=&funder=from_hud&funder=from_fhfc&funder=from_rhs&funder=from_lhfa&overall_expiration_date_of_governing_program=5000&nid=3500

instances of water intrusion. This resulted in unplanned and ongoing repairs to address the microbial growth precipitated by the water intrusion. HACFM had not received funding from insurance or reimbursement from FEMA as of June 21, 2023, and indicates total unmet needs of approximately $14 million to make necessary repairs and to harden all properties.

The number of units and affected households is provided in *Table 19*.

Table 19 - Housing Authority of the City of Fort Myers Number of Units and Affected Households.

Property Name	Type of Housing	Affected Buildings	Units Impact	Number of Individuals
Horizon Apartments	Family	15	170	375
Renaissance Preserve I	Senior	1	13	15
Renaissance Preserve II	Family	15	50	204
Renaissance Preserve III	Family	7	19	60
Renaissance Preserve IV	Family	11	35	149
Royal Palm Towers	Senior	1	99	104
Landings at East Point	Family	4	7	31
East Point Place	Family	4	15	46
TOTAL		**58**	**408**	**984**

Lee County Housing Authority (LCHA) also had roof damage to 143 public housing units. As of June 21, 2023, LCHA had not received assistance for the roof repairs from FEMA. As of June 21, 2023, no families have been displaced from their units, and all unit interiors were in good condition with no mold present. Debris has also been completely removed from all sites. LCHA indicated approximate unmet needs of $2 million to make necessary repairs and harden all properties. *Table 20* has the best data available for public housing authority units.

Table 20 - The public housing authorities damaged.

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Needs
Lee County	2	2	551	$16,000,000

Source: County staff data collection via the Housing Authority of the City of Fort Myers and the Lee County Housing Authority

In addition to the impacts of damage to PHAs, there are currently waitlists for public housing units, housing choice vouchers, and project-based vouchers within the County demonstrating a significant need for additional affordable housing units. The County requested waitlist information from the Housing Authority of the City of Fort Myers and the Lee County Housing Authority for this assessment. *Table 21* identifies the number of households on the waitlist at the Housing Authority of the City of Fort Myers and the Lee County Housing Authority as of March 22, 2023.

Table 21 - Local Public Housing Authorities waitlists.

Housing Authority	Households on Waitlist for Public Housing Units	Households on Waitlist for Housing Choice Vouchers (HCV)	Households on Waitlist for Project-Based Vouchers
Housing Authority of the City of Fort Myers	8,993	2,183	1,664
Lee County Housing Authority	1,478	76	N/A
TOTAL	10,471	2,259	1,664

Source: Data collection via the Housing Authority of the City of Fort Myers and the Lee County Housing Authority.

Waitlist information indicates a significant need for rent subsidy and affordable housing options in the County, but this need is further exacerbated by the lack of housing units available for households that have received a voucher for housing assistance. Lee County Housing Authority indicated that their Housing Choice Voucher program had a total of 46 households searching for a housing unit that was available and would accept their voucher. As of July 10, 2023, some voucher holders have been searching since March 21, 2023, and some since May 16, 2023. The Housing Authority has granted the maximum number of extensions that their policy allows, but the move-in success rate is only about 20 percent of all vouchers issued.

The Lee County Homeless Continuum of Care provided further evidence supporting lack of available units for households with housing vouchers. Among households placed into housing through Rapid Re-Housing programs in the six months preceding Hurricane Ian, the average length of time between program entry and housing move in was 40.2 days. Among households placed in the six months following the Hurricane, the average was 80.9 days. The amount of time required for a household to locate a safe and affordable housing unit has more than doubled since Hurricane Ian.

To address the remaining unmet needs for public housing authorities, permanent supportive housing providers, affordable housing developers, and LMI renters, Lee County has allocated $350,000,000 in CDBG-DR funds to support the new construction, acquisition, rehabilitation, and preservation of affordable housing units. Lee County anticipates that PHAs and developers will utilize State Housing Initiatives Program (SHIP) funding, as well as other federal and state funding sources in coordination with CDBG-DR to make necessary improvements and to expand affordable housing opportunities for low- and moderate-income households.

4. FAIR HOUSING, CIVIL RIGHTS DATA, AND ADVANCING EQUITY

"Disasters impact people differently based on the communities where they live, and recovery efforts should take those differences into account. Housing is more than the roof over one's head, and research has shown that community is a powerful predictor of social mobility. Where a person lives determines whether they have access to healthy, safe living environments, high-quality education, employment opportunities, and responsive municipal and commercial services."[46]

Lee County compiled and analyzed data regarding protected classes and vulnerable populations to determine the most effective way to use CDBG-DR funding to avoid perpetuating disparities and reduce inequities as communities recover. Lee County ensures that all programs and activities in this Action Plan that include sale, rental, financing, or other housing related transactions as well as the repair, enhancement, or construction of dwellings will be conducted without bias or discrimination on the basis of race, color, religion, sex (including gender identity and sexual orientation), familial status, national origin, and disability.

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[46] HUD's Office of Fair Housing and Equal Opportunity, Grantee Guide for CDBG-DR Recipients https://www.hud.gov/sites/dfiles/FHEO/documents/23CDBG-DR%20Consolidated%20Notice%20Fair%20Housing%20Guidance%20(2022).pdf

Projects and activities planned with CDBG-DR funds will not have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs, particularly in racially and ethnically concentrated areas of poverty. Programs are designed to provide necessary ADA accommodations to support the recovery needs of impacted individuals with disabilities.

Lee County demonstrates this assurance by:

- Posting notices of policy to the Civil Rights Act of 1964 Title VI (Nondiscrimination in Federally Assisted Programs)[47] and Title VII (Equal Employment Opportunity)[48], the Civil Rights Act of 1968 Title VIII (Fair Housing),[49] and Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act[50] as amended;

- Performing annual monitoring as required by law, rulemaking, and federal grantor funding agreements;

- Developing action plans and other documentation required by federal and state authorities.

- Observing Executive Order 13166 to ensure that eligible persons with Limited English Proficiency (LEP) are provided meaningful access to all federally assisted and federally conducted programs and activities[51];

- Anticipating emerging requirements of the February 2023 HUD Notice of Proposed Rulemaking for Affirmatively Furthering Fair Housing,[52] by agreeing to affirmatively further fair housing by taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity; and

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[47] Lee County, Notice of Policy, Civil Rights Act Title VI, *Lee County, Southwest Florida,* Fort Myers, Fla., 2023 https://www.leegov.com/civilrights

[48] Lee County, Notice of Policy, Equal Opportunity Plan (EEOP), *Lee County, Southwest Florida,* Fort Myers, Fla, 2023, https://www.leegov.com/hr/jobsearch/employmentreports

[49] Lee County, Notice of Policy, Fair Housing, *Lee County, Southwest Florida,* Fort Myers, Fla., 2023 https://www.leegov.com/dhs/fairhousing

[50] Lee County, Notice of Policy, ADA Notice, *Lee County, Southwest Florida,* Fort Myers, Fla., 2023 https://www.leegov.com/ada

[51] Lee County, FY 23/24 Policy, Plan and Monitoring Report for Serving Persons with Limited English Proficiency (LEP), *Lee County, Southwest Florida,* Fort Myers, Fla., 2023 https://www.leegov.com/civilrights/Documents/FY23-24_Lee_TitleVI_Nondiscrimination%20%20LEP%20Plan%20061223.pdf

[52] Housing and Urban Development Department, Affirmatively Furthering Fair Housing: A Proposed Rule by the Housing and Urban Development Department on 02/09/2023, *Federal Register, The Daily Journal of the United States Government,* Washington D.C., 2023 https://www.federalregister.gov/documents/2023/02/09/2023-00625/affirmatively-furthering-fair-housing

- Adhering to state oversight of these issues through the Florida Civil Rights Act of 1992 and Fair Housing Act of 1983 (State Statute 760), which prohibit housing discrimination based on race, color, religion, sex, national origin, age, handicap, or marital status. In addition to the seven federally protected classes, age is also a protected class in the State of Florida, giving Florida residents greater protection under the State fair housing laws. The Florida Human Rights Act of 1969, formally created the Florida Commission of Human Relations (FCHR), which is responsible for the enforcement of State Statue 760.

- Submitting quarterly reports about the County's fair housing activities to the Florida Department of Commerce (formerly Department of Economic Opportunity) as proof of compliance for the federal grants it administers. These reports include a log of activities related to fair housing and copies of posters and other handouts.

Equal access to residential housing (housing choice) is fundamental to each person in meeting essential needs such as pursuing personal, educational, or employment goals. Because housing choice is so critical to economic development, fair housing is a goal that government, public officials, and the public must embrace for equality of opportunity to become a reality. In recognition of equal housing access as a fundamental right, the County, in support of its Analysis of Impediments to Fair Housing Choice 2019-2023 report, has committed to:

- Analyze and evaluate fair housing data in each jurisdiction.

- Assess regional segregation, racially and ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs based on the protected classes.

- Examine and address fair housing issues.

- Identify fair housing priorities and goals.

- Implement actions to address regional and local impediments.[40]

Efforts to address fair housing objectives specifically outlined in the 2019-2023 report and under proposed rulemaking are summarized in *Table 22.*

Table 22 - Impediments and Actions for Fair Housing

Regional / Local Impediments	2019-2023 Report	Actions
Regional	**Housing discrimination in the private market**	Prominently display fair housing information on public counters and other points of contact, such as libraries and community centers.
		Include fair housing logo on all housing related documents for public review, brochures, and legal advertisements. Ensure all non-profit agencies that receive housing funds use the logos in advertising.
		Entitlement jurisdictions' scopes of work for fair housing services should include expansion of outreach to small property owners.
		Coordinate countywide regular, random testing to identify issues, trends, and problem properties.
Regional	**Disparity in private mortgage lending for racial and ethnic minorities**	Increase outreach efforts and homeownership opportunity awareness to minority and ethnic communities.
		Maintain lender guidelines, state and federal assistance, and Fair Housing Laws.
		Fund credit and financial management courses with CDBG or other funds to improve credit issues of racial and ethnic minority applicants.
		Promote the availability of general budgeting classes conducted by the University of Florida Extension

Regional / Local Impediments	2019-2023 Report	Actions
		Services to the targeted communities.
Regional	**Public transit options and rising cost of transportation in general limit location options for many lower-income households**	Support a regional transportation system that provides services to low- and moderate-income households throughout the County.
		Continue funding bus pass programs and support the creation of alternative modes of transportation to low/mod and disabled households.
Regional	**Adequacy of Fair Housing education, training, and outreach programs**	Coordinate fair housing programs among three entitlement jurisdictions to collaborate and consolidate efforts to affirmatively further fair housing in Lee County.
		Support non-profit capacity building programs that encourage local non-profits to apply for Fair Housing Initiatives Program (FHIP) and/or Fair Housing Assistance Program (FHAP) funds through HUD.
		Offer fair housing workshops throughout the year.
		Maintain a fair housing log to record activities undertaken throughout the year to affirmatively further fair housing.

Regional / Local Impediments	2019-2023 Report	Actions
Regional	Sufficiency of housing units for persons who require accommodations to access housing in the County	Implement fair housing workshop topics to include "reasonable accommodation" requirements and requirements of Section 504, the Fair Housing Act, the Americans with Disabilities Act, the Architectural Barriers Act, and the State's Accessibility Building Codes.
		Maintain the Universal Design requirements in new construction funded by federal and state grants.
		Continue to prioritize and fund rehabilitation of housing units for those who require accommodations to access special need housing units.
City of Cape Coral - Local	Fair Housing Ordinance does not include protected class based on familial status and does not define handicapped persons	The City of Cape Coral is considering changes to its ordinance.
City of Fort Myers - Local	The city does not have a Fair Housing Ordinance	The City of Fort Myers is considering adoption of a new Fair Housing Ordinance.
New Considerations		
Regional	Neighborhood Opposition to Diversity in Housing Type	Provide information to local government officials and to the public regarding the need for a variety of housing types and tenure (rights to occupy, rent and own) for all persons regardless of income levels.
		Provide training specifically to elected officials and appointees regarding fair housing laws and local land use decisions.

Regional / Local Impediments	2019-2023 Report	Actions
		Regular review of land use decisions by local governments.
		Continually encourage minority and low-income households to seek housing counseling from HUD-certified housing counseling agencies. Provide information to housing counseling agencies to assist them in educating minority and low-income households regarding the range of housing options in the City of Fort Myers, including those outside of minority and low-income concentration areas. Encourage attendance at budget management and credit counseling classes offered by housing counseling agencies.
City of Fort Myers - Local	Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)	Promote and conduct outreach to the R/ECAP that highlights job training and business development opportunities offered by the Southwest Florida Enterprise Center and other agencies in the area.
		Continue to follow the City's Language Access Plan for Spanish-speaking residents and develop additional outreach activities for the Haitian population.
		Annually sponsor fair housing training for City of Fort Myers residents; network with nonprofit, neighborhood-based and faith organizations; and educate institutions to reach out to minority

Regional / Local Impediments	2019-2023 Report	Actions
		populations and areas of minority concentration.
		Continue to promote and provide mortgage assistance to low-moderate income residents.

AFFIRMATIVELY FURTHERING FAIR HOUSING

As noted above, the County integrates efforts to affirmatively further fair housing in its ongoing operations. In addition, the County also provides the following resources and education to landlords, managers, agents, and the general public:

- Production of Resources: Posters, training programs, an internet-based app, surveys and quizzes, pencils and activity books, and FAQs are available to support local analysis and outreach.
- Information Outreach: Landlords, managers, real estate agents, and local service agencies post or provide Fair Housing Notices in multiple languages.
- Information for the General Public: Providing the general public with an overview of Fair Housing laws and information regarding individual rights and responsibilities when buying and selling homes at https://www.leegov.com/dhs/fairhousing.
- Training: Four audiences have access to training specifically designed for them, including children, consumers, housing providers and professionals, and real estate agents.
- One-on-One Technical Assistance: When requested for specific areas of concern, consultations and technical assistance may be given to target audiences.

The County will ensure that CDBG-DR funds to rehabilitate/reconstruct property damaged by Hurricane Ian and to provide new housing stock are allocated to serve LMI persons, vulnerable populations, and historically underserved communities.

Among these target households, the County will further prioritize households with one or more of the below characteristics:

- Households with seniors aged 62 or older; and
- Households including persons with special needs who require accommodation to access structures, receive services, and participate in programs.

In the interest of advancing equity and reducing barriers when enrolling in and accessing disaster recovery assistance, the County will ensure that all citizens have equal access to information about the programs. The County will offer reasonable accommodation at no charge to the requestor and provide outreach, project documents, and all other communication in alternate formats for persons with disabilities or limited English proficiency. For the County's Hurricane Ian recovery effort, all program documents will be translated into Spanish.

> **Lee County's Civil Rights Title VI Coordinator monitors Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) et seq.; Executive Order 13166; and the U.S. Department of Labor Revised Guidance Regarding the Title VI Prohibition against National Origin Discrimination Affecting LEP Persons.**

To ensure timely, meaningful access and an equal opportunity for individuals with disabilities or LEP to participate in service and benefits provided, the County and its vendors and subrecipients will follow its FY 23/24 Civil Rights Act, Title VI Nondiscrimination Policy, Plan, and Monitoring Report with Policy, Plan, and Monitoring Report for Serving Persons with Limited English Proficiency ("LEP Plan"). Through its LEP Plan, 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:

- Annually assess target audiences for LEP services;
- Ensure meaningful verbal communication with LEP persons and their authorized representatives;
- Communicate information contained in vital documents;
- Provide ADA compliant interpretation services at no cost to the person being served;
- Inform LEP persons of these services and their right to access them free of charge;
- Accommodate public input from the LEP community;
- Comply with HUD's published Safe Harbor provisions; and
- Manage this plan routinely to ensure continuing compliance.

In accordance with HUD's long-standing guidance on LEP issues, issued January 2007,[53] the LEP Plan was developed through an analysis of four factors:

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[53] https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against

1. The number or proportion of eligible LEP persons in the Lee County service area;
2. The frequency with which LEP individuals come in contact with County service providers;
3. The nature and importance of the program, activity or service provided to the LEP population; and
4. Available resources and overall costs to provide LEP assistance.

Lee County is committed to on-going outreach to potential beneficiaries throughout the program. Targeted efforts will reach those who are elderly, disabled, LMI, and of varied racial and ethnic groups. 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 diversity in application entry points, including onsite and mobile application sites. Vendors are also required to ensure meaningful access and equal opportunity to programs for individuals with disabilities and persons with limited English proficiency, including appropriate ADA accommodations and translation of vital documents.

The County will ensure ongoing coordination with public service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact, including preventing households from becoming homeless, is brought to the County's attention for a coordinated approach. In addition, any vulnerable 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 who are elderly, disabled, victims of domestic violence or have other vulnerabilities will be coordinated through local service providers and the Unmet Needs Long-Term Recovery Group.

a) DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

Table 23 represents demographic profiles for the State of Florida. The American Community Survey (ACS) data includes estimates of populations by race for the declared counties and MID areas. The counties depicted in *Figure 11,* which were designated as eligible for individual assistance are included in *Table 23*, as the "Disaster Declaration" data elements. Lee County was designated as a most impacted and distressed (MID) area. The data points included in *Table 23*, for the "MID" headings are exclusively referencing Lee County, both incorporated and unincorporated areas.
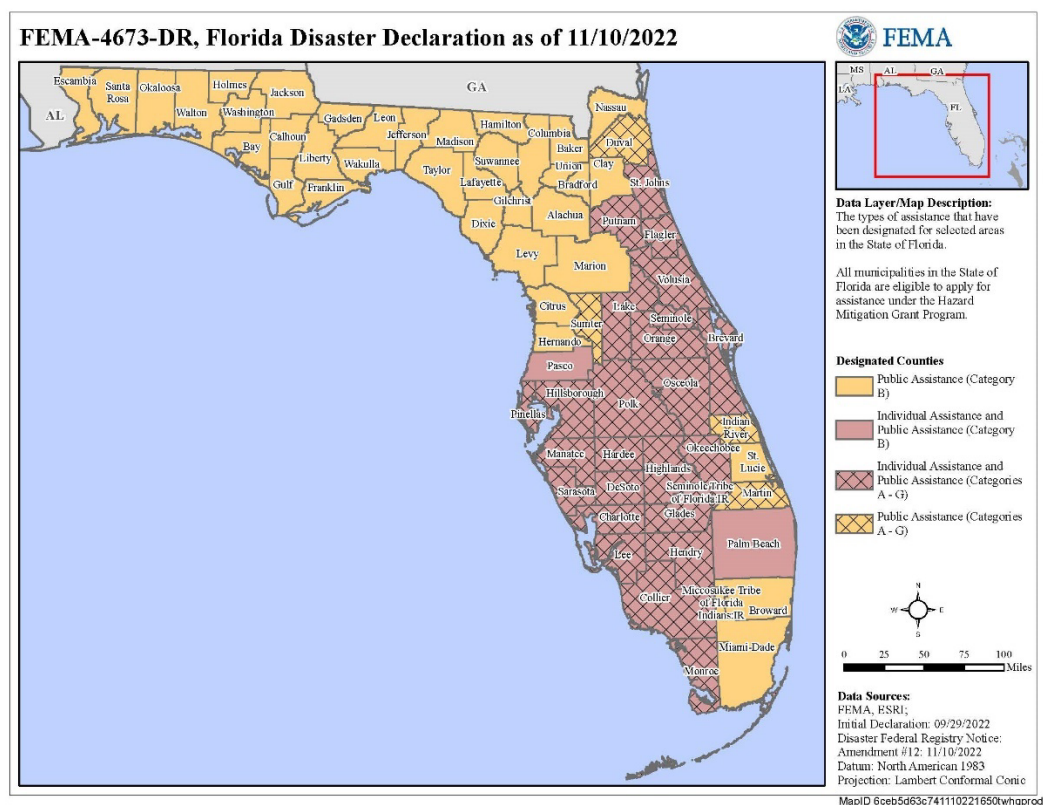
Figure 11- Florida Disaster Declaration for Hurricane Ian[54]

Social Vulnerability Index (SoVI)

The County is using the social vulnerability index to highlight communities that may experience disproportionate challenges to recovery. The index uses the most recent census data (2016-2020) to measure the social vulnerability of all census tracts with population in Lee County. The index is a comparative metric facilitating examination of differences in social vulnerability across census tracts, the building blocks of counties. It graphically illustrates the variation in social vulnerability across the Ian impact area, shows where there is uneven capacity for preparedness and response, and helps pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery. Utilizing social vulnerability is also useful as an indicator in determining the differential recovery from disasters.

The social vulnerability index synthesizes socioeconomic variables, which the research literature suggests contributes to reduction in a community's ability to prepare for, respond to, and recover from hazards. Here, 29 different variables (*Table 36*) are combined to create a unique view of

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[54] https://gis.fema.gov/maps/dec_4673.pdf

social vulnerability for any area of interest. The County utilized the social vulnerability index here for several reasons:

- Its past success at providing actionable and useful information to decision makers. Social vulnerability data was instrumental in targeting resources to those who were in most need during recovery and rebuilding operations in South Carolina following the catastrophic flooding of 2015 and has been a key aspect of impact and unmet needs assessment since that time. The October 2015 flooding in South Carolina was the first implementation of a methodology to understand pre-event social conditions across the impact area in a post-event recovery context. Social vulnerability was utilized by the state disaster recovery office to identify target areas across the states that would require outside assistance to rebound from this disaster. CDBG-DR supported recoveries in South Carolina[55], Puerto Rico[56], and West Virginia[57] (among others) coupled social vulnerability data with FEMA, NFIP, and SBA support to rapidly highlight areas with greatest need for additional recovery resources and, more importantly, to determine unmet needs.

- Utilizing empirically based measures of community social vulnerability provides an "apolitical" approach for distributing scarce disaster recovery dollars and rebuilding resources for the most benefit to the places that were most impacted and least able to bounce back on their own from this disaster.

- Social vulnerability information also provides an empirically driven approach to graphically illustrate and assist Voluntary Organizations Active in Disasters (VOADs) in prioritizing their recovery efforts. Understanding where socially vulnerable populations are located in relation to disaster damages can expedite recovery, implementing data-driven assessment tools to guide actionable and expedited impact to the most vulnerable populations.

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[55]https://scor.sc.gov/sites/scor/files/Documents/Mitigation/South%20Carolina%20Mitigation%20Action%20Plan%20(March%2026%2C%202020).pdf
[56] https://cdbg-dr.pr.gov/en/download/action-plan-amendment-8-nonsubstantial-amendment-effective-on-february-25-2022/
[57] https://wvfloodrecovery.com/wp-content/uploads/resources/WV-Action-Plan-hyperlinked_final_submission-to-HUD-042117.pdf

Table 23 - The social vulnerability index inputs.

Name	Minimum	Maximum	Mean
Median Age (MEDAGE)	22.60	82.20	51.26
Percent Black (QBLACK)	0.00	0.84	0.07
Percent Native American (QNATAM)	0.00	0.05	0.00
Percent Asian (QASIAN)	0.00	0.17	0.02
Percent Hispanic (QHISP)	0.00	0.69	0.18
Percent Population under 5 years or 65 and over (QAGEDEP)	0.09	0.91	0.38
Nursing Home Residents per Capita (QNRRES)	0.00	0.25	0.00
Percent Female (QFEMALE)	0.27	0.63	0.51
Percent Female Headed Households (QFHH)	0.00	0.49	0.09
Percent Unoccupied Housing Units (QUNOCCHU)	0.02	0.98	0.26
Percent Renters (QRENTER)	0.00	0.83	0.21
People per Unit (PPUNIT)	1.41	4.37	2.57
Percent Speaking English as a Second Language with Limited English Proficiency (QESL)	0.00	0.37	0.08
Percent with Less than 12th Grade Education (QED12LES)	0.00	0.50	0.10
Percent Employment in Extractive Industries (QEXTRCT)	0.00	0.31	0.01
Percent Employment in Service Industry (QSERV)	0.00	0.48	0.18
Percent of Housing Units with No Car (QNOAUTO)	0.00	0.35	0.05
Percent Civilian Unemployment (QCVLUN)	0.03	0.67	0.27
Percent Poverty (QPOVTY)	0.00	0.52	0.11
Percent Mobile Homes (QMOHO)	0.00	0.93	0.10
Percent Female Participation in Labor Force (QFEMLBR)	0.22	0.74	0.48
Percent Households Receiving Social Security Benefits (QSSBEN)	0.10	0.94	0.48
Percent of Children Living in 2-parent families (QFAM)	0.00	1.00	0.65
Percent Households Earning over $200,000 annually (QRICH200K)	0.00	0.38	0.07
Median Gross Rent (MDGRENT)	$0.00	$3,501.00	$1,355.85
Median Housing Value (MDHSEVAL)	$17,500.00	$2,000,001.00	$260,843.64
Percent of population without health insurance (QUNINSURED)	0.00	0.46	0.12
Percent of households spending more than 40% of their income on housing costs (QHSEBURDEN)	.04	0.61	0.32

Source: Social vulnerability index data[58]

The social vulnerability index metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners, and decision makers. It empirically measures and visually depicts a population's (in)ability to adequately prepare for, respond to, and rebound from disaster events. Operationally, social vulnerability assessments are now part of FEMA's Geospatial Framework, the set of spatial products delivered automatically by FEMA upon Presidential Disaster Declaration. An overview of variables influential in how social vulnerability is manifest across Lee County for Hurricane Ian are shown in *Table 24* below.

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[58] https://www.vulnerabilitymap.org/

Original Version: September 1, 2023

Table 24 - Social Vulnerability for Hurricane Lee County Census Tracts.

Factor	Vulnerability Influence	Description	% Variance Explained	Dominant Variables	Component Loading
1	▲	Age and Dependence	26.9249	Low Median Age (MEDAGE)	-0.9417
				Low % beneficiaries (QSSBEN)	-0.9155
				Low % Age Dependent Populations (QAGEDEP)	-0.9120
				High Occupancy Housing (PPUNIT)	0.8744
				Lower % Vacant Homes (QUNICCHU)	-0.7316
				Ethnicity (Hispanic) (QHISP)	0.7263
				Female Headed Households (QFHH)	0.7024
2	▼	Wealth	10.6272	House Value (MDHSWVAL)	0.8024
				Wealth (QRICH200K)	0.7107
				Wealth (PERCAP)	0.6743
3	▲	Access Barrier and Housing Cost Burden	9.5257	No Auto Access (QNOAUTO)	0.7985
				High Housing Cost Burden (QHSEBURDEN)	0.7476
				Renters (QRENTER)	0.6188
4	▲	Employment Type and Poverty	7.4032	Employment (Primary Sector) (QEXTRCT)	0.8665
				Poverty (QPOCTY)	0.5710
				Low rent (QRENTER)	-0.5700
5	▲	Gendered Employment and Gender	6.9444	Gendered (Female) Employment (QFEMLBR)	0.8585
				Gender (Female) QFEMALE	0.7147
				Populations with Health Insurance (QUNINSURED)	-0.3991
6	▲	Household Structure and Race	6.0450	Low % Children in 2 parent families (QFAM)	-0.6202
				Low % Asian Populations (QASIAN)	-0.5611
				Race (Black) (QBLACK)	0.5380
7	▲	Race and Dependence	3.8228	Race (Native American) (QNATAM)	0.7065
				Low nursing home residents per capita (QNRRES)	-0.3076
				Gender (Female) (QFEMALE)	0.2843
		Total Variance Explained	71.293		

Source: Social vulnerability index data[59]

In Lee County, social vulnerability is mainly driven by seven specific combinations of input variables that increase vulnerability in certain places. SoVI can be manifest by:

- Age and Dependence (aging populations, high occupancy households, higher Hispanic populations, and female-headed households);
- Lack of wealth;
- Access Barriers (no automobiles, high cost of home ownership, housing burden related to the percentage of income spent on housing costs, and higher renter populations);
- Extractive Industry (employment and poverty in areas with lower rent costs);
- Lack of health insurance or higher rates of female headed households;
- Higher black populations; and
- Native American populations.

[59] https://www.vulnerabilitymap.org/

Social vulnerability across Lee County using a 3-Class SoVI (*Figure 12* and *Figure 13*) depict several areas where populations have a lower ability to prepare for, respond to, and ultimately rebound from disasters, including: Matlacha, Pine Island, North Cape Coral, North Fort Myers, and the Lehigh Acres areas, as well as smaller areas of social vulnerability in Harlem Heights, Calusa Palms, and Cypress Lake in Fort Myers and the Caloosahatchee area of Cape Coral.

Although the 5-class SoVI representation provides more detail about how social vulnerability manifests across Lee County, utilizing the 3-class SoVI streamlines the process of unifying it with Ian impact and recovery support data in meaningful ways.
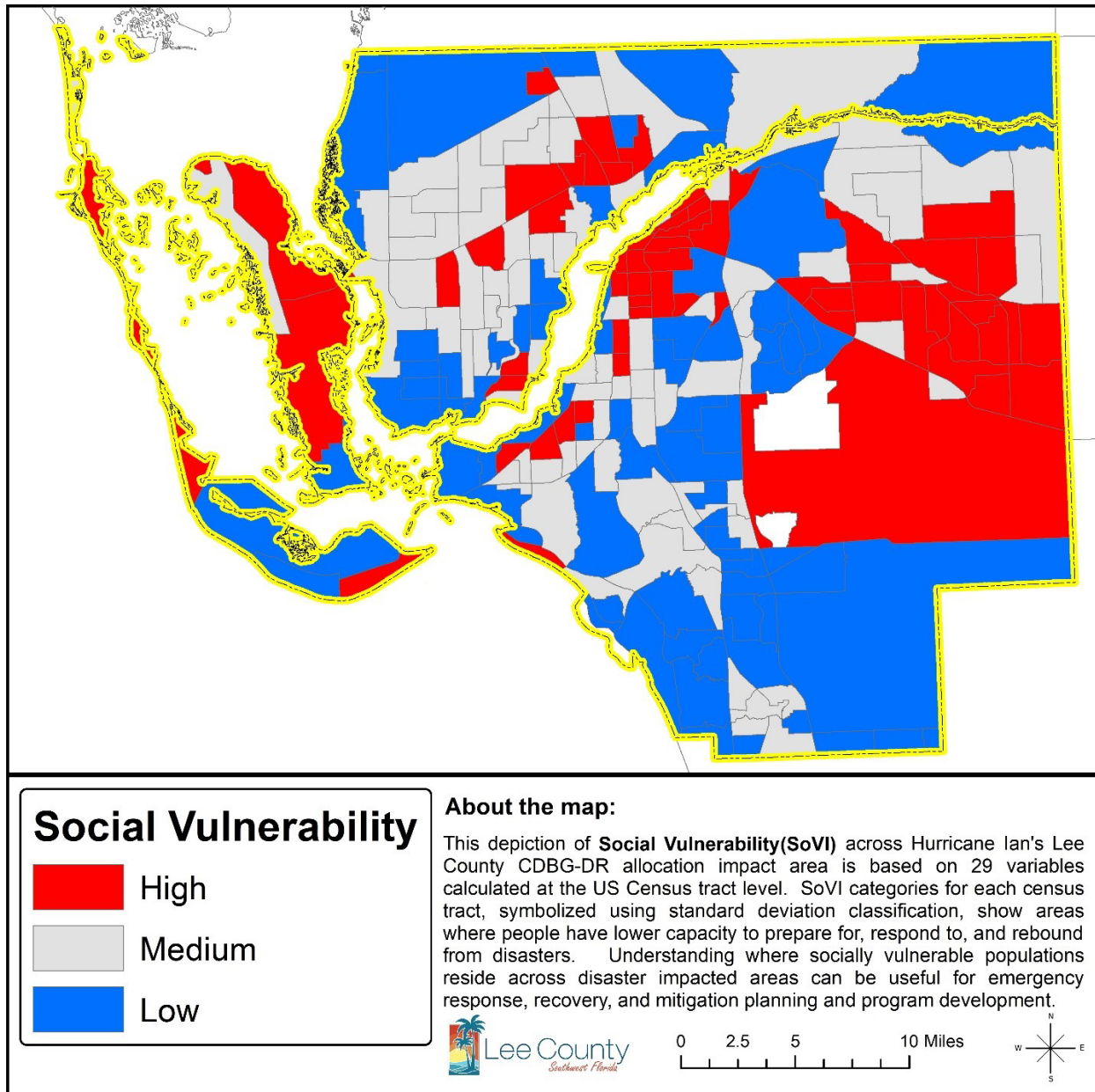
Figure 12 - The 3-Class Level Social Vulnerability Index (SoVI) by Census Tract for Lee County. [60]

About the map:

This depiction of **Social Vulnerability(SoVI)** across Hurricane Ian's Lee County CDBG-DR allocation impact area is based on 29 variables calculated at the US Census tract level. SoVI categories for each census tract, symbolized using standard deviation classification, show areas where people have lower capacity to prepare for, respond to, and rebound from disasters. Understanding where socially vulnerable populations reside across disaster impacted areas can be useful for emergency response, recovery, and mitigation planning and program development.

Social Vulnerability

- High
- Medium
- Low

0   2.5   5   10 Miles

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[60] Map generated from data using UCF's Vulnerability Mapping and Analysis platform: www.vulnerabilitymap.org
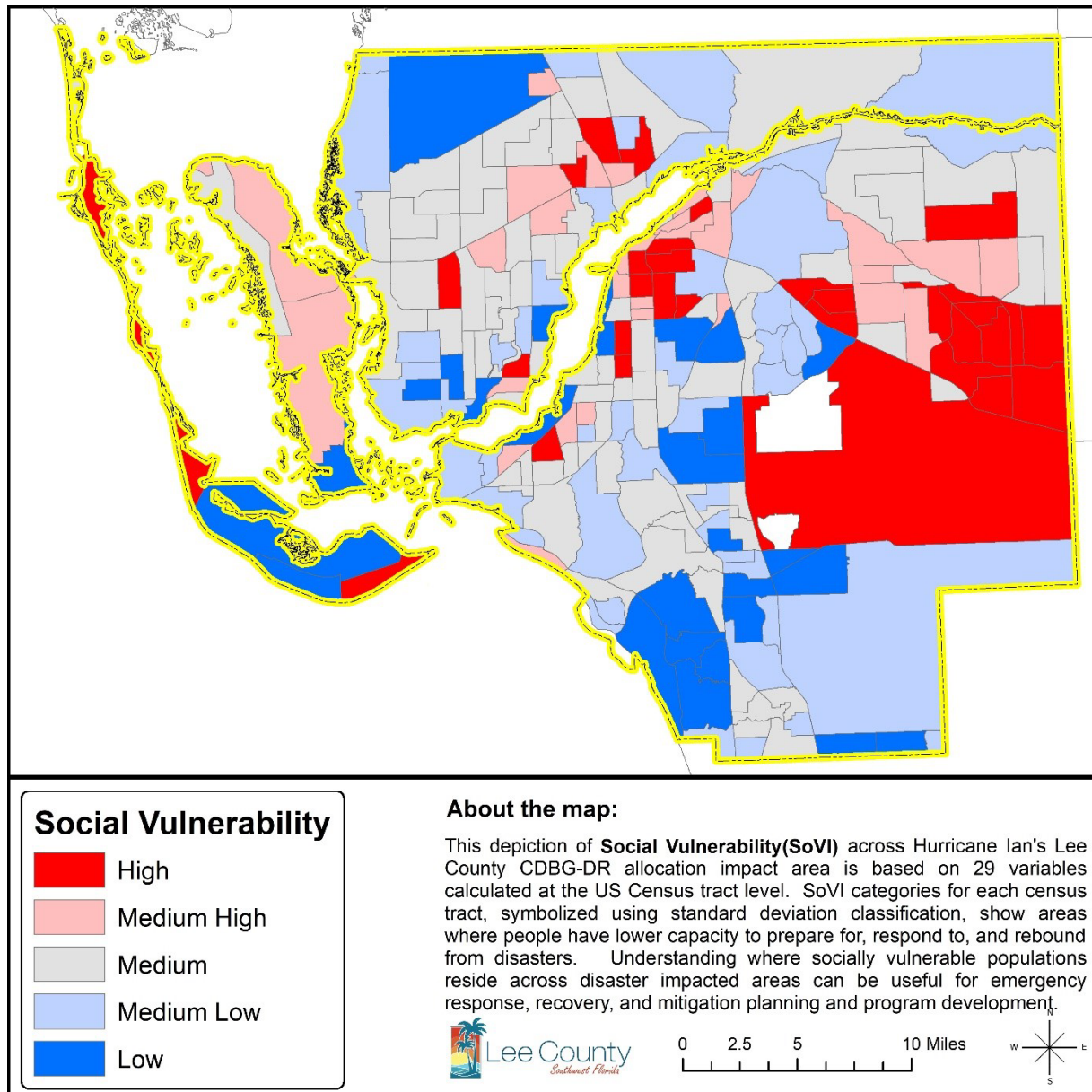
Figure 13 - The 5-Class Social Vulnerability Index (SoVI) by Census Tract for Lee County. [61]

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1) Damage Assessment and Real Property Verified Loss (RPFVL)

FEMA data[62] provides a broad summary of disaster survivors, damage, and funding at the zip code level across Lee County's Hurricane Ian impacted areas. Aggregating individual applicant information to the zip code level enables a visual depiction of damage from various perspectives, including total Real Property FEMA Verified Loss (RPFVL), average loss, and counts of FEMA applicants with a Lee County RPFVL. These three distinct perspectives on the same dataset can help identify not only where disaster survivors were impacted, but also provide a measure of intensity and magnitude of Ian's impacts across the Area of Impact (AOI).

An assessment of total damage indicates that Sanibel Island, much of Fort Myers Beach, as well as North Fort Myers absorbed the brunt of Hurricane Ian's impact. Four zip codes in Lee County each sustained greater than $50,000,000 in Real Property FEMA Verified Losses and an additional four zip codes had between $25,000,000 - $50,000,000 in losses. (*Figure 14*)

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[62] https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1
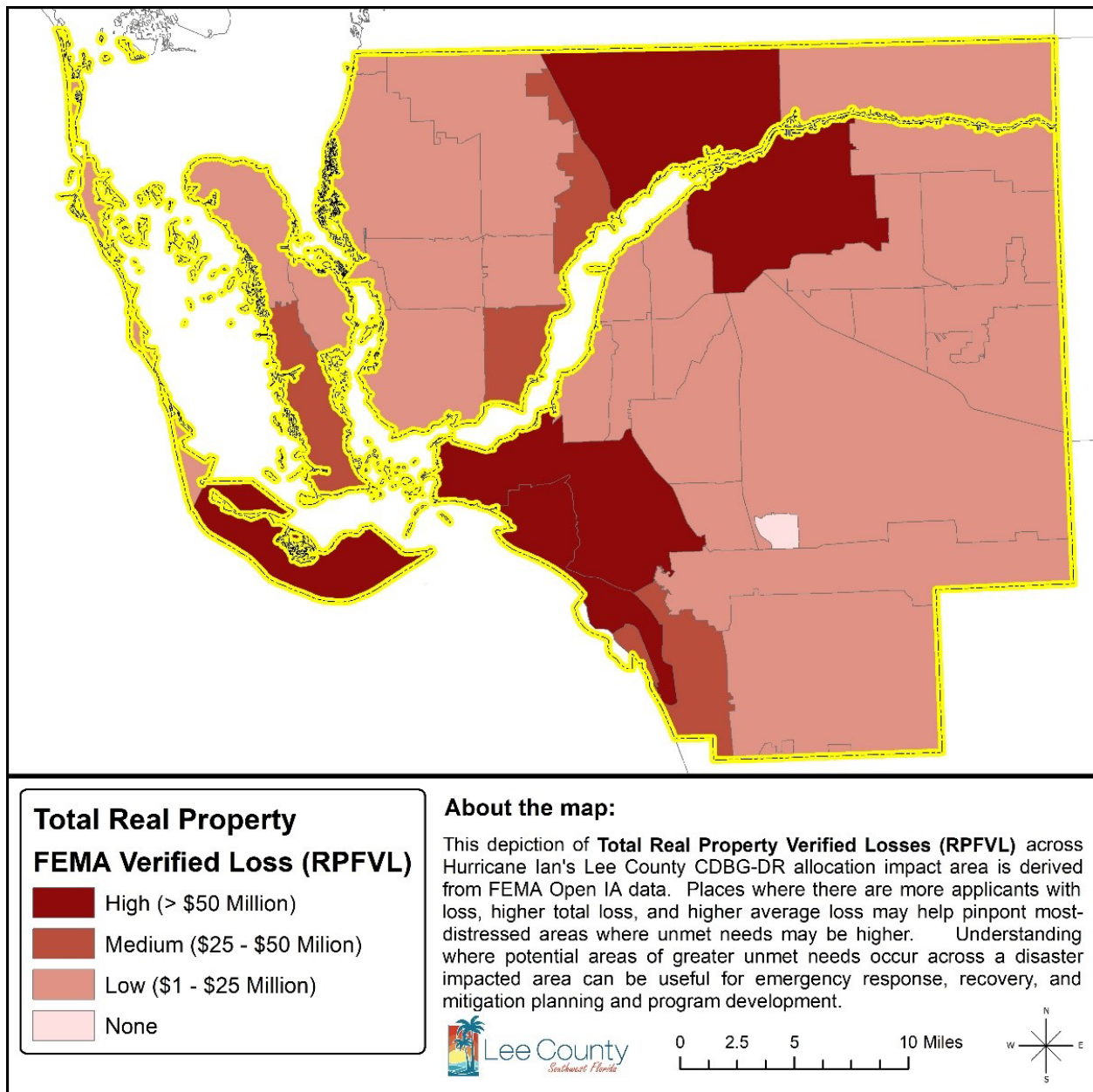
Figure 14 - The total Real Property FEMA Verified Loss (RPFVL). [63]

Total losses clearly depict where the greatest amount of damage occurred across the County from Hurricane Ian, but summarizing losses alone may not provide a complete picture of the impacts in terms of the number of damaged structures and the relative intensity of damage. To pinpoint where higher relative damage occurred and identify those areas with more damaged housing requires an assessment of the Real Property FEMA Verified Loss (RPFVL) data in two

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[63] Map generated by summarizing FEMA Open Valid Registrant data: https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

additional ways, namely: damage assessed through averages and damage assessed through counts of applicants impacted. Mapping places by average RPFVL (*Figure 15*) highlights several additional areas, including southern Pine Island, and the entire coastal area south of Fort Myers Beach. In total, six zip codes had higher than $8,000 in average real property losses and another four zip codes had between $4,000 - $8,000 in average real property losses.
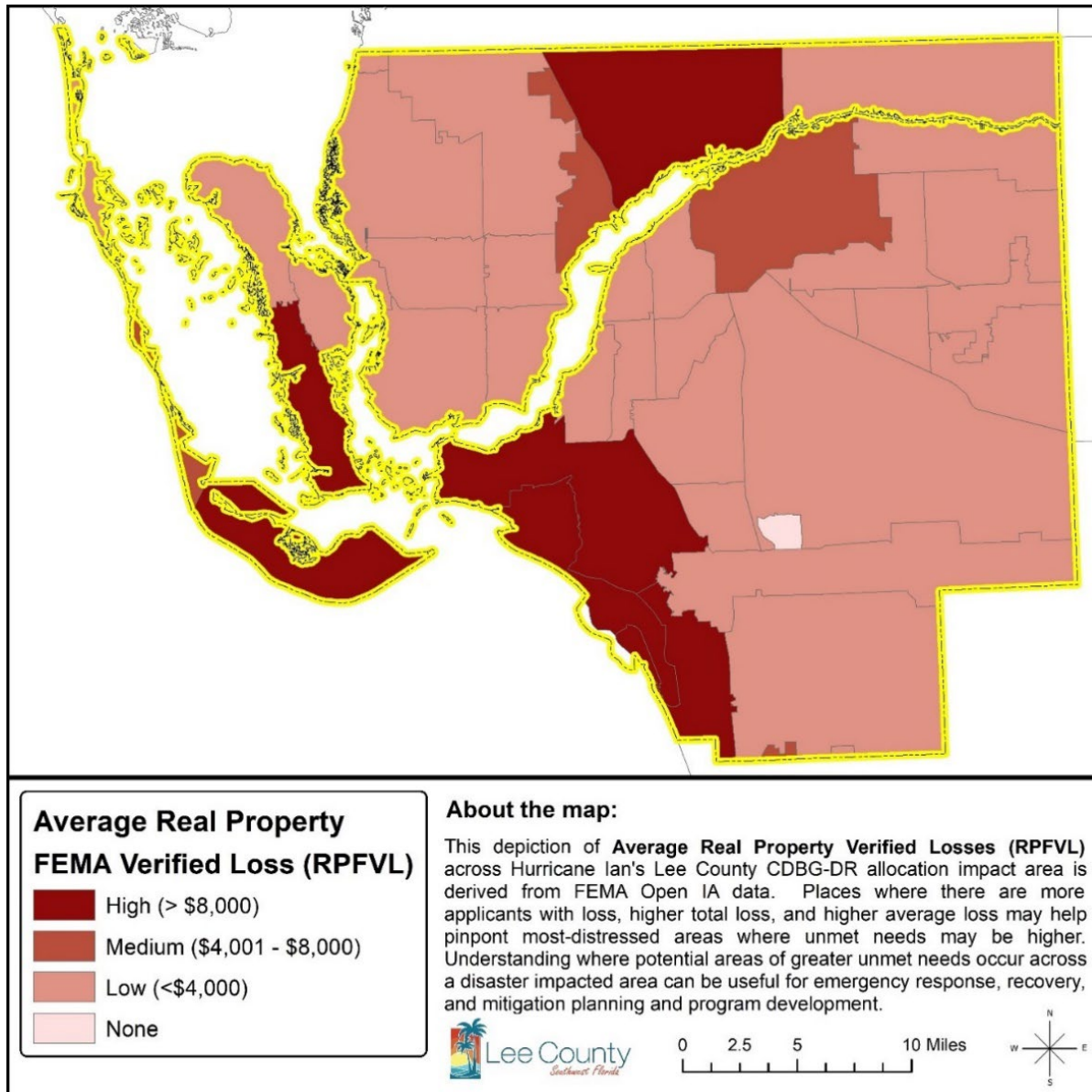

Figure 15 - Average Real Property FEMA Verified Loss (RPFVL). [64]

Like total losses, average real property losses do not provide a complete picture of the most-impacted survivors. Zip codes with higher average damage can be categorized into either places with fewer high dollar losses, or places where many Lee County residences suffered moderate losses. Forming a more comprehensive understanding of Ian's impacts and pinpointing the most-impacted areas require the addition of a third perspective of the same FEMA dataset – namely the count of applicants with RPFVL *(Figure 16)*. Mapping counts of applicants with any level of RPFVL provides a slightly different pattern of impacts across the Ian AOI. In addition to the areas highlighted by total and average losses, most of Cape Coral and an additional zip code in Pine Island/Matlacha appear to be the most impacted.
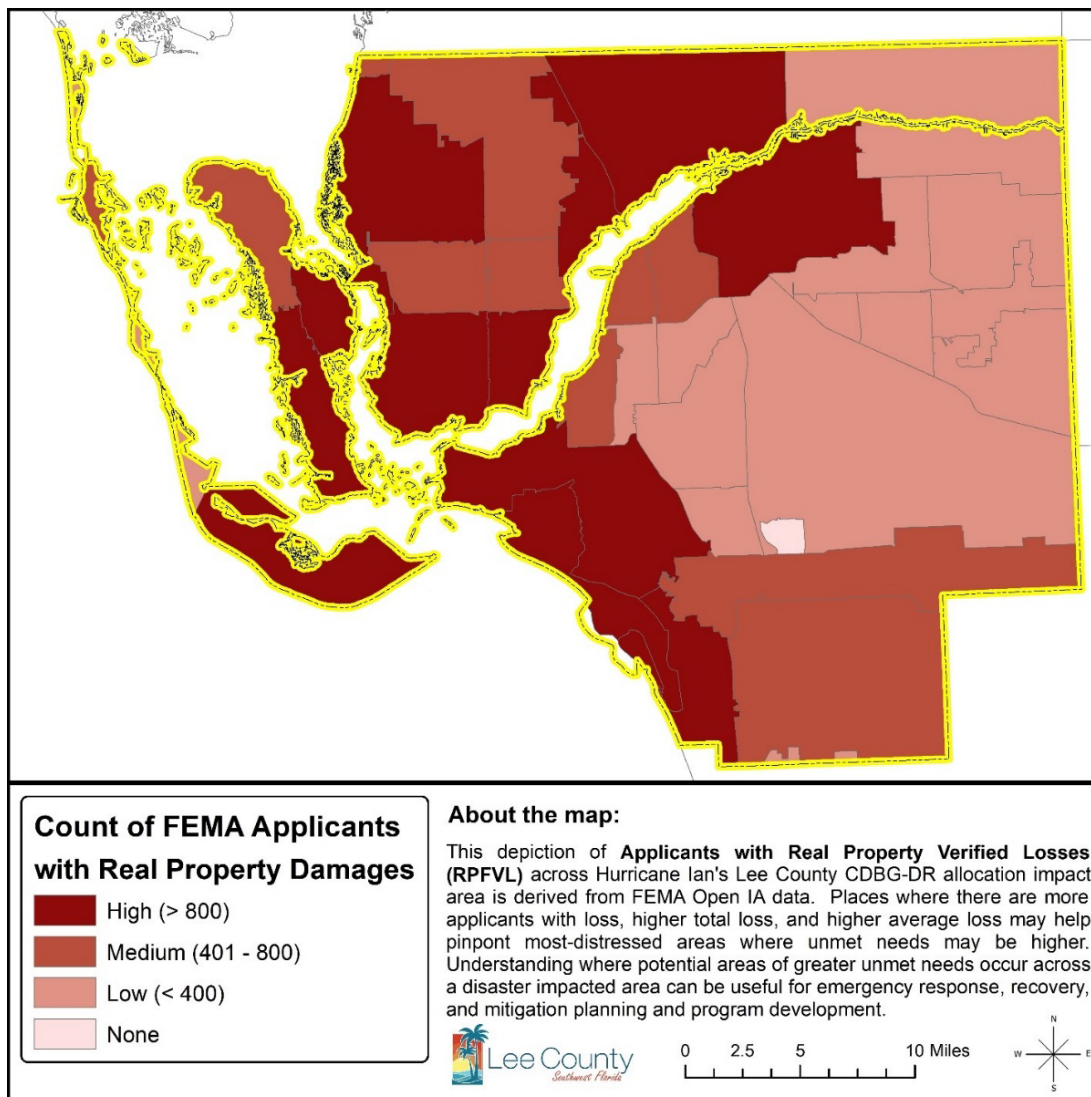

Figure 16 - The count of applicants with real property damages. [65]

[65] Map generated by summarizing FEMA Open Valid Registrant data: https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

Combining these three perspectives on Ian's impact provides perhaps the clearest representation of where more people experienced damage, where that average damage was higher, and where there were more damaged housing units. Creating a composite RPFVL score ranging from 0 – 9 clearly indicates the impacts to coastal Lee County, North Fort Myers, Sanibel, Pine Island, and North Fort Myers (*Figure 28*). These places contain disaster survivors who had higher damages in greater numbers than the remainder of the AOI.

Composite RPFVL Score
Count + Total + Avg. Loss

- ■ High (7 - 9)
- ■ Medium (4 - 6)
- ■ Low (1 - 3)
- □ None

About the map:

This depiction of **Composite FEMA Real Property Verified Losses (RPFVL)** across Hurricane Ian's Lee County CDBG-DR allocation impact area is derived from FEMA Open IA data. Places where there are more applicants with loss, higher total loss, and higher average loss may help pinpont most-distressed areas where unmet needs may be higher. Understanding where potential areas of greater unmet needs occur across a disaster impacted area can be useful for emergency response, recovery, and mitigation planning and program development.
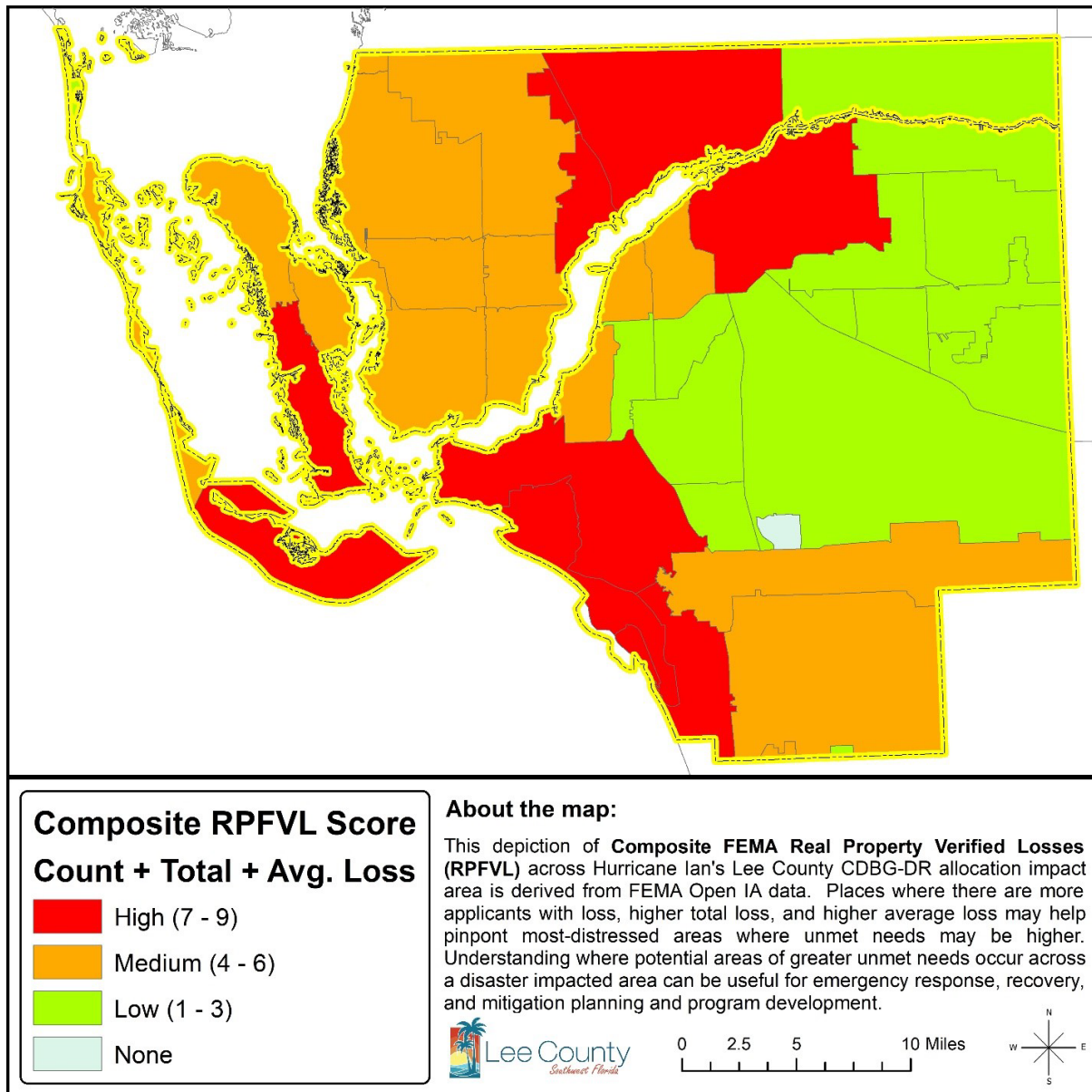
0   2.5   5   10 Miles

Figure 17 - The composite RPFVL score displaying the combination of the Count of applicants with real property loss, total RPFVL, and average real property loss. [66]

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[66] Map generated by summarizing FEMA Open Valid Registrant data: https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

Recognizing that impoverished and otherwise marginalized populations (those with higher social vulnerability) will have a harder time recovering from disaster, it is important to assess the impact data through the lens of equity. The social vulnerability index provides a replicable, science-based approach to understanding where the populations least able to prepare for, respond to, and rebound from disasters live. *Figure 18* provides a visual of social vulnerability (2020) based on Cutter et al. (2003)[67] across the impacted area.

Combining social vulnerability with the composite RPFVL score to create bivariate representations creates a depiction of the most impacted areas. The burgundy areas in *Figure 18* show where high social vulnerability and high numbers of disaster survivors are located. There are several large areas where losses (most impacted) and social vulnerability (distress) intersect, including several census tracts in North Fort Myers, Pine Island, Sanibel, coastal Fort Myers, and north central Fort Myers.
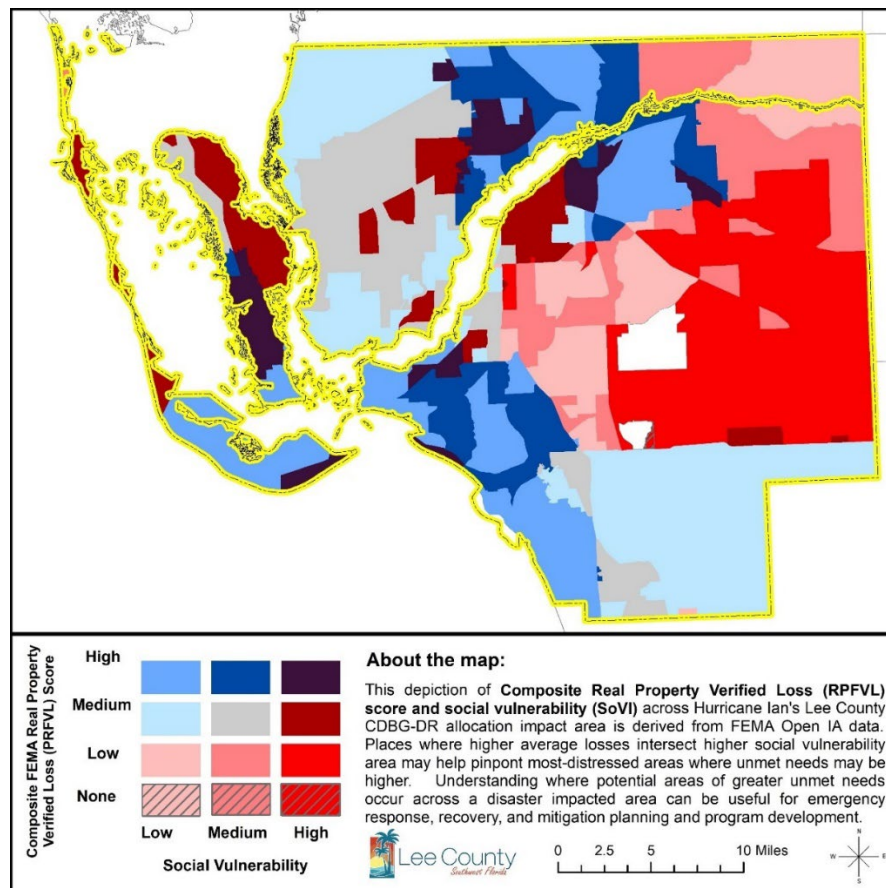

Figure 18 - The bivariate map displaying average real property loss and social vulnerability. [68]

[67] https://doi.org/10.1111/1540-6237.8402002
[68] Map generated by summarizing FEMA Open Valid Registrant data: https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1

The social vulnerability index provides a composite look at variables that affect equity, mobility, and well-being within a community, but to identify vulnerabilities for specific protected classes, the County conducted a distinct analysis to identify "where protected classes and vulnerable populations live, how the disaster affected them, and how they will benefit from CDBG-DR funds."[69] The analysis considers factors such as poverty, educational attainment, and housing tenure. These factors tend to indicate the vulnerability of specific populations and their ability to respond to and recover from natural disasters. "Research findings reflect a world in which people of low socio-economic status are more vulnerable in the face of disasters and are more likely to suffer more serious consequences during impact, from property damage to homelessness to physical and financial impacts."[70]

1) Households With Children and Elderly Households

Households with children under the age of five and populations over the age of 65 are more vulnerable to the impacts of natural disasters. As noted in *Table 25*, an estimated 3,426,171 of age dependent populations are concentrated in Disaster Declared counties, including 275,522 located within Lee County.

There are approximately 132,579 children under 18 years old, and approximately 213,650 individuals over the 65 years old in households in Lee County. Among the children, 14 percent identify as multiple races, and 13 percent identify as Black or African American. Among elderly persons, only 2.7 percent identified as multiple races, and 3 percent identify as Black or African American. Slightly more than 36 percent identify as Hispanic or Latino. Approximately 6.7 percent of households with children are headed by a grandparent and an additional 1.3 percent of Lee County's children reside in foster care or with an unrelated adult. [71]

Households with children or elderly persons living in poverty may experience additional barriers to recovery after a natural disaster due to limited financial means to pay for necessary repairs, recuperate from lost wages, and replace lost household supplies. In Lee County, 18.7 percent of children and 9.8 percent of individuals aged 65 years and over reside in households where the income in the last 12 months was below the poverty level. [72]

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[69] https://www.hud.gov/sites/dfiles/FHEO/documents/23CDBG-DR%20Consolidated%20Notice%20Fair%20Housing%20Guidance%20(2022).pdf
[70] https://www.samhsa.gov/sites/default/files/dtac/srb-low-ses_2.pdf
[71] American Community Survey 2021 5-Year Estimates, Table S0901 Children Characteristics and S0103 Population 65 Years and Over, Lee County, FL https://data.census.gov/table?g=050XX00US12071&tid=ACSST1Y2021.S0103
[72] American Community Survey 2021 5-Year Estimates, Table S0901 Children Characteristics, Lee County, FL https://data.census.gov/table?g=050XX00US12071&tid=ACSST1Y2021.S0103

The U.S. Bureau of Labor Statistics indicates that educational attainment typically contributes to lower unemployment rates and increased economic mobility[73]. Households that have a high school diploma or less than a high school education may have less economic resources to recover from a natural disaster. In Lee County, approximately 38.4 percent of individuals aged 65 years or older have a high school diploma or less than a high school education.[74]

Housing tenure can also play an important role in a household's ability to recover. Homeowners may have insurance, FEMA assistance, SBA loans, and other means by which to make necessary repairs and recover from disasters. Renters in Lee County's strained rental housing market are faced with unique challenges to recovery. Some property owners have elected to sell rental properties or not renew leases with tenants that were residing in rentals at the time of the disaster. More than 59 percent of children in households in Lee County reside in owner-occupied housing units and 40 percent reside in rental units. [75] More than 85 percent of individuals aged 65 and over live in owner-occupied housing units and only 14.2 percent in rental units. [76] Households with children would greatly benefit from increased access to homeownership opportunities that reduce housing cost burden and increase housing stability.

Figure 19 shows the relative concentration of population under the age of 5 and over the age of 65 by census tract within the County. The areas above 50 percent concentration of these dependent populations are strong indicators of vulnerable populations that may have greater needs for post-disaster assistance. As indicated in *Figure 19*, several areas on the barrier islands and in southern Lee County have high concentrations of age dependent households. These areas were significantly impacted by flooding, storm surge, and wind damage from Hurricane Ian.

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[73] https://www.bls.gov/emp/images/ep_chart_001.png

[74] American Community Survey 2021 5-Year Estimates, Table S0103 Population 65 Years and Over, Lee County, FL https://data.census.gov/table?g=050XX00US12071

[75]American Community Survey 2021 5-Year Estimates, Table S0901 Children Characteristics, Lee County, FL https://data.census.gov/table?g=050XX00US12071

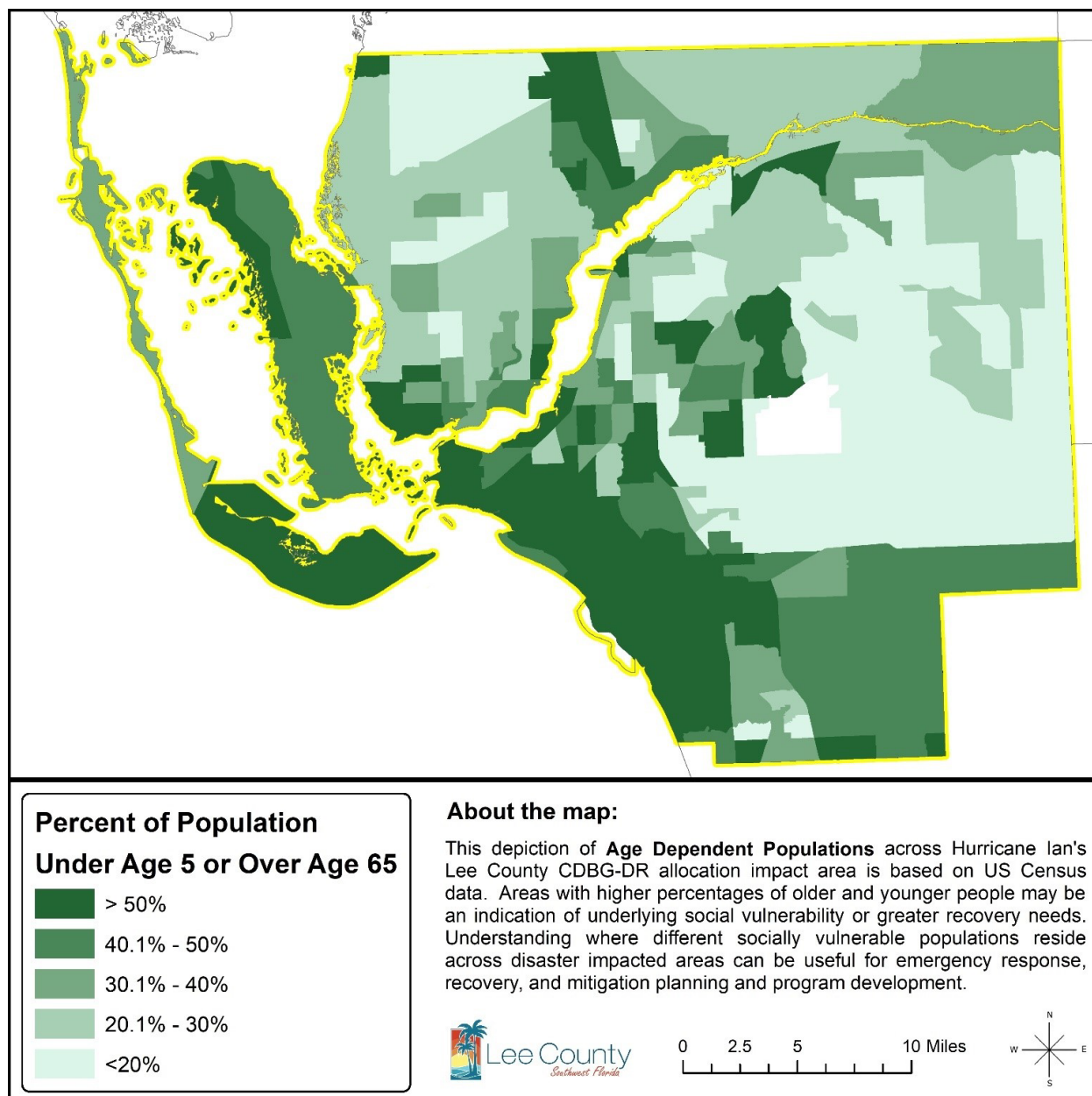[76]American Community Survey, Table S0901 Children Characteristics and S0103 Population 65 Years and Over, for Lee County, FL https://data.census.gov/table?g=050XX00US12071

Figure 19 - A map of age dependent populations. [77]

2) Race

White or Caucasian populations account for the majority of people in Lee County with 711,422 individuals, or 7.14 percent, of the total population in the disaster declared areas, but Lee County reflects more diverse populations. About 75,666 individuals are classified as Black or African American in Lee County, roughly 4.28 percent of the total population. American Indian and Alaska Native populations located in Lee County make up about 4,112, or .5 percent of the population. American Indian and Alaska Natives in Lee County represent about 5.91 percent of the total population in disaster declared counties[78] (*Figure 20* and *Figure 21*).

According to 2021 American Community Survey 5-year estimates there were 580,320 White individuals in Lee County, 61,597, or 10.6 percent, had an income below the poverty level in the last 12 months.[79] Black or African American individuals experienced poverty at higher rates with 21.5 percent, or 12,866 individuals having an income below the poverty level in the last 12 months.[80] Approximately 8.8 percent of American Indian and Alaska Native populations in Lee County had an income below the poverty level in the last 12 months.[81]

Approximately 35.4 percent of White non-Hispanic populations in Lee County have a bachelor's degree or higher. Black or African American populations make up about 16.7 percent of the college graduate population in Lee County. [82]

The 2021 American Community Survey 5-year estimates indicate there are approximately 17,878 households that identify as Black or African American in Lee County. Of these, 8,212, or 45.9 percent, reside in owner-occupied housing units, and 9,666, or 54 percent, in rental units.[83] Of the 250,358 White households, 191,054, or 76.3 percent, reside in owner-occupied units, and 59,304, or 23.7 percent, in rental units.[84] The percentage of Black or African American households that reside in owner occupied housing units is more than 30 percent less that percentage of White residents. Black or African American populations would benefit from increased access to homeownership opportunities that reduce housing cost burden and increase housing stability.

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[78] https://www.census.gov/quickfacts/fact/table/leecountyflorida,FL,US

[79] American Community Survey, Table B17001A Poverty Status in the Past 12 Months (White alone population for whom poverty status is determined), for Lee County, FL https://data.census.gov/table?g=050XX00US12071

[80] American Community Survey, Table B17001B Poverty Status in the Past 12 Months (Black or African American alone population for whom poverty status is determined), for Lee County, FL https://data.census.gov/table?g=050XX00US12071

[81] American Community Survey, Table B17001C Poverty Status in the Past 12 Months (American Indian and Alaska Native alone population for whom poverty status is determined), for Lee County, FL https://data.census.gov/table?g=050XX00US12071

[82] https://data.census.gov/table?q=educational+attainment+race&g=050XX00US12071&tid=ACSST1Y2021.S1501

[83] American Community Survey 2021 5-Year Estimates, Table B25003B (Black or African American Alone Householder), Lee County, FL https://data.census.gov/table?g=050XX00US12071

[84] American Community Survey 2021 5-Year Estimates, Table B25003A Tenure (White Alone Householder), Lee County, FL https://data.census.gov/table?g=050XX00US12071

Figure 20 indicates the areas of minority concentration within the County. Areas within the City of Fort Myers and Lehigh Acres have the highest concentration of minority households. Flood and wind damaged occurred within the City of Fort Myers, whereas Lehigh Acres had less severe impacts, mostly wind related.
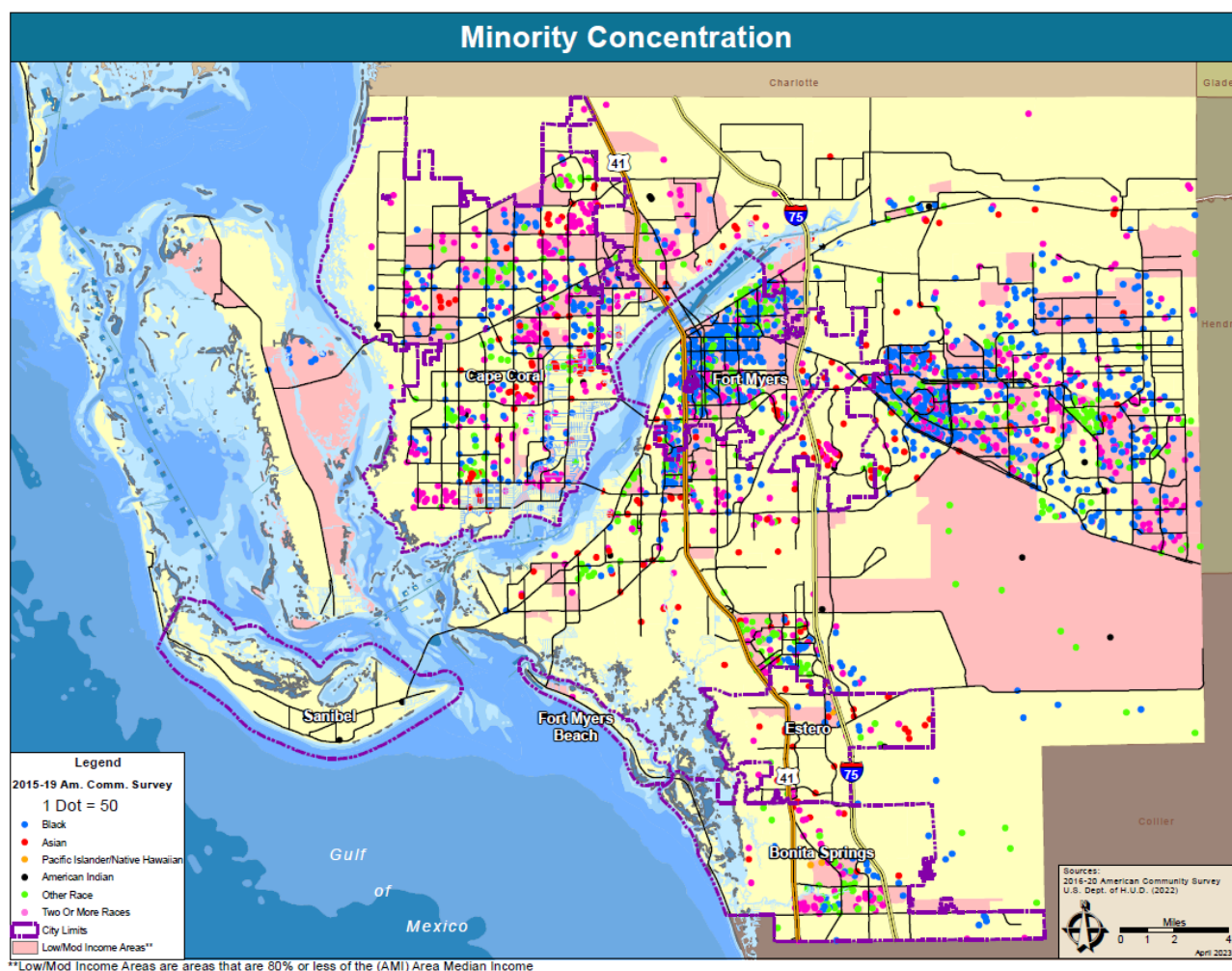

Figure 20 – Map of Minority Concentration Areas in Lee County, FL. [85]

3) Ethnicity

Lee County's diversity is also reflected in its significant Hispanic and Latino population. Persons of all races, who are Hispanic and Latino, account for 24.3 percent[86] of Lee County's total population, about 199,856 individuals. 2021 American Community Survey 5-Year Estimates indicate that income was below the poverty level, in the last 12 months, for approximately 18.6

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[85] Map generated from 2015-20219 American Community Survey Data
[86] https://www.census.gov/quickfacts/fact/table/FL,leecountyflorida,US/PST045222

percent of Lee County's Hispanic population.[87] Hispanic or Latino populations make up about 17.3 percent of the individuals residing in Lee County with a bachelor's degree or higher. [88] About 46.3 percent of Hispanic or Latino populations reside in rental units, with the remaining 53.7 percent in owner-occupied units.[89]

Figure 21 indicates the areas of Hispanic concentration within the County. Areas within the City of Fort Myers, Cape Coral, and Lehigh Acres have the highest concentration of minority households. Flood and wind damaged occurred within the City of Fort Myers and Cape Coral, whereas Lehigh Acres had less severe impacts, mostly wind related.
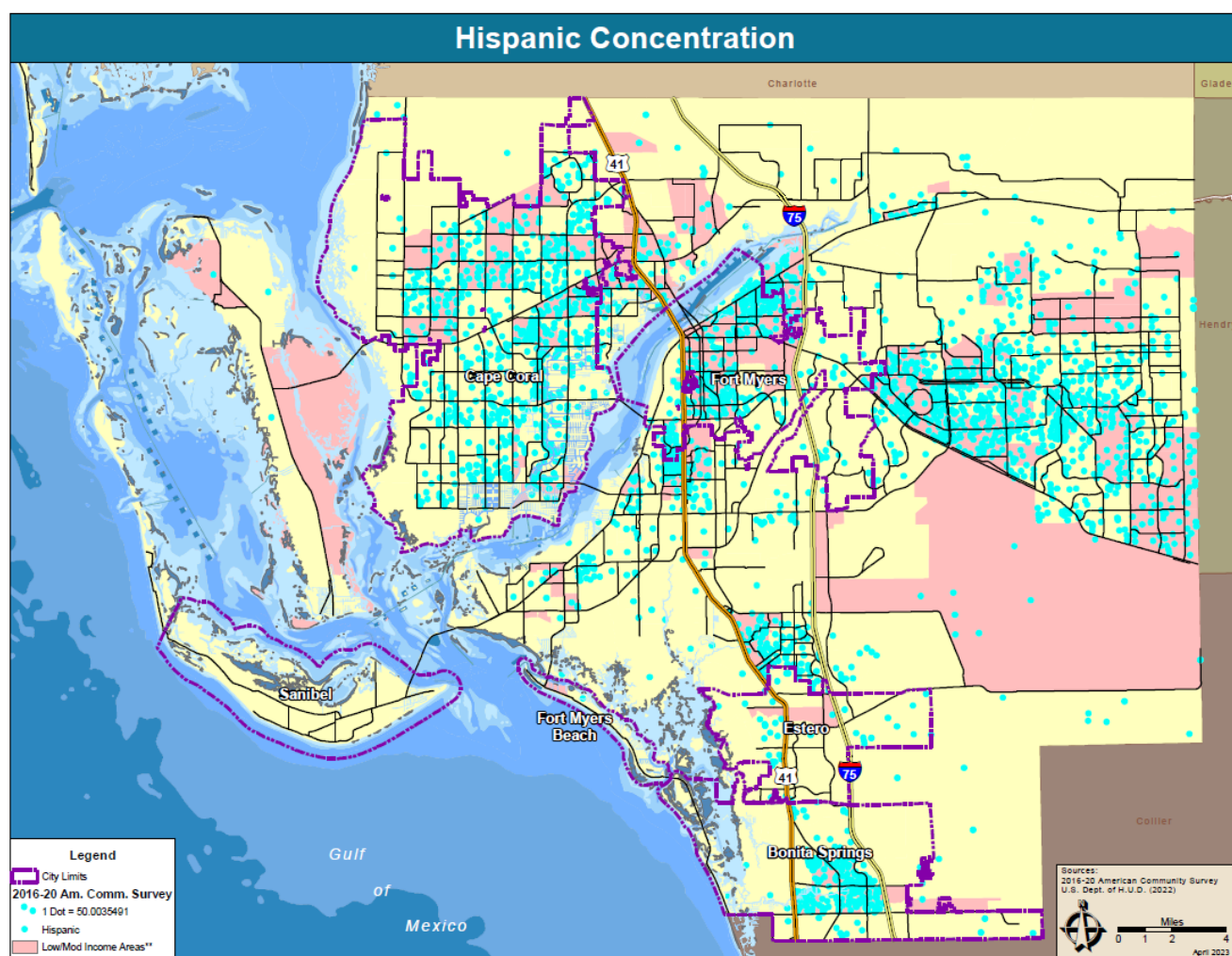

Figure 21 – Map of Hispanic Concentration Areas in Lee County, FL[90]

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[87] https://data.census.gov/table?q=HISPANIC+POVERTY&g=050XX00US12071&tid=ACSST5Y2021.S1701
[88] https://data.census.gov/table?q=educational+attainment+race&g=050XX00US12071&tid=ACSST1Y2021.S1501
[89] https://data.census.gov/table?q=HISPANIC+housing+tenure&g=050XX00US12071&tid=ACSDT5Y2021.B25003I
[90] Map generated from 2016-2020 American Community Survey Data