

## 2020-21 STORMS PUBLIC COMMENTS

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**COMMENT:** I feel like the extra funding should go to helping the people from Hurricane Laura. There are a lot of people living in bad situations because no one will help them. They don't meet the criteria for one reason or another. I was one of those people. Thank God for me SBP and The Fuller Center bent the rules and I was able to come home.

**RESPONSE:** Thank you for your comment. The funds for this appropriation are specific for Hurricane Ida and the May 2021 Severe Storms. However, some homeowners impacted by Hurricane Laura may have also received damage from the May 2021 Severe Storms and could possibly benefit from these additional funds for Louisiana recovery. Lastly, the budgeted funds for the Restore Louisiana Homeowner Assistance Program are projected to serve all eligible homeowners impacted by Hurricane Laura. Please make sure you have completed a survey with the Restore Louisiana Homeowner Assistance Program, as reimbursement funds could be an eligible expense.

To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001.

**COMMENT:** Why I have not received any fund to repair my house after Ida ? I had several Adjusters from Louisiana and the Bankrupt Insurance company my house still with mildew, lead paint, peeling from all the damage, crack walls as it shifted because the strong wind fall tree Etc. I am sick from inhaling it . 2 years has passed by I am trying to get it fix.

**RESPONSE:** Thank you for your comment. You are encouraged to complete a survey with the Restore Louisiana Homeowner Assistance Program if you have not already done so. The survey is the critical first step toward receiving program assistance. To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

Additionally, you may reach out to Louisiana Insurance Guaranty Association (LIGA), which is a private association of insurance companies established by Louisiana law to provide certain benefits to the policyholders and claimants of insolvent insurers. Visit [www.laiga.org](https://www.laiga.org) for more information.

**COMMENT:** My Award letter The beginning of this year I need two Sheds they promise me and the ever brought to me to store everything promise y

**RESPONSE:** Thank you for your comment. With questions about an existing Restore Louisiana Homeowner Assistance Program application file, you may call the program call center at 866.735.2001 between 8 a.m. – 5 p.m., Monday through Friday.

With questions about the program, visit [restore.la.gov](https://restore.la.gov), which includes a list of resources, FAQs and policies related to how moving expenses are covered under the program. As a general rule, the program does not provide on-site storage.

**COMMENT:** I need help for tearing down home I total disabled don't drive I live in a fema unit please help I call and call nobody cares to help I have a lot medical problems stay at doctors 2/3 times a week I registered no body cares:

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receiving program assistance. To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

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**COMMENT:** Most of the victims of 8-10 back to back disasters, it would had been no way to have financially prepared for our current battles. For the storms, FEMA did not issue deposits/funding. Most of the residents have been summoned to appear in court by August 2023. Prior to the current summonings, residents were requested to provide feedback on not receiving help that was/ is mandated. My home as of this month has been demolished with further expectations. However, as others, I too am requesting help.

**RESPONSE:**

Thank you for your comment. You are encouraged to complete a survey with the Restore Louisiana Homeowner Assistance Program if you have not already done so. The survey is the critical first step toward receiving program assistance and must be completed by the August 1 deadline. To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001.

The program's intent is to provide grant assistance – prioritizing vulnerable, low-to-moderate income (LMI) households – to homeowners impacted by Hurricanes Laura, Delta and Ida and/or the May 2021 Severe Storms who meet the following requirements:

- Owner-occupant of the home at the time of disaster event and still maintains ownership through program final project inspection.
- Damaged address was the applicant's primary residence at the time of disaster event.
- Suffered damage as a result of the 2020-21 disasters listed above.
- Eligible structure as determined by program, including single family homes, duplexes, mobile homes and condominiums.
- Located in one of the 60 disaster-declared parishes.

The program will provide periodic updates after you complete the initial survey, and based on your survey responses, the program will provide more information regarding the availability of a full program application and any next steps required. **The deadline to complete the survey is Tuesday, August 1, 2023.**

**COMMENT:** It really doesn't matter what is done with the money because I didn't get any help so I'm in the position of begging someone to come see what it will cost to clean and clear the problem I applied with you all and 2 other agencies still no luck I wish y...

**RESPONSE:** Thank you for your comment. With questions about an existing Restore Louisiana Homeowner Assistance Program application file, you may call the program call center at 866.735.2001 between 8 a.m. – 5 p.m., Monday through Friday. The program's intent is to provide grant assistance – prioritizing vulnerable, low-to-moderate income (LMI) households – to homeowners impacted by Hurricanes Laura, Delta and Ida and/or the May 2021 Severe Storms who meet the following requirements:

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- Located in one of the 60 disaster-declared parishes.

**The deadline to complete the survey is Tuesday, August 1, 2023.** For more information regarding program eligibility, see the program policy manual at [restore.la.gov](https://restore.la.gov).

**COMMENT:** Roofs need to be more hurricane resilient with the new Texturized felt. Foundation need to be supported with dirt. New roofs for the structure a must

**RESPONSE:** Thank you for your comment. The Restore Louisiana Homeowner Assistance Program allows for [IBHS Fortified Roof](#) standards within the construction cost. See the program [policy manual](#) as well as the see the [Fortified Roof Repair Checklist](#) on the program website for more information on the fortified standards which exceeds LA building codes.

**COMMENT:** I submitted the survey to Restore Louisiana. Our home was damaged during Hurricane Ida. We still have blue tarps on the roof of our house that was put on by the Corp of Engineers. We had water over a foot deep that damaged some walls, floors, window sills, bathroom. The outside house shutters were blown off. We had damaged to the fence around the house along with the pump shed. A huge pecan tree in the front yard was blown over. Also, the barn on the back of the property was destroyed. There is tin and other materials still up in the trees from the barn being destroyed. We could use any help possible to repair our home and property.

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- Located in one of the 60 disaster-declared parishes.

During the application process, the program will provide periodic updates regarding any next steps required.

**COMMENT:** Dear sirs concerning the restore money that was added to the program why isn't something being available for the people that suffered loss of everything and lived in camper trailers that was blocked up and anchored down many elderly and people lived in what they could afford to live in at the time and did not qualify for help from restore because it wasn't considered a mobile home

**RESPONSE:** Thank you for your comment. Since the Restore Louisiana Homeowner Assistance Program is a federal program, the state must adhere to federal guidelines regarding eligible uses of grant funding. Per program policy, to qualify as an eligible structure type, the impacted home must be a single-family home, duplex, town home, modular home, manufactured home, or condominium. Potential exceptions will be reviewed on a case-by-case basis.

For more information related to structure type eligibility and assistance, visit [restore.la.gov](https://restore.la.gov).

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**COMMENT:** I tried numerous times since July 1, 2022 to get help. I even drove to Lake Charles to attend a meeting. I want to know who is getting these government funds because I know of no one in my hard hit area that's gotten anything. I'd like to know who in Louisiana has a big fat pocket book.

**RESPONSE:** Thank you for your comment. The program's intent is to provide grant assistance – prioritizing vulnerable, low-to-moderate income (LMI) households – to homeowners impacted by Hurricanes Laura, Delta and Ida and/or the May 2021 Severe Storms who meet the following requirements:

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The program recently expanded the FEMA-determined damage threshold from \$5,000 to \$3,000 and raised the allowable maximum of insurance received from \$25,000 to \$50,000, expanding the number of homeowners who can potentially qualify for assistance. The program provides weekly updates on funding disbursed and grants awarded, which can be found in the program [Pipeline Reports](#), posted on the program website.

**COMMENT:** Hi I have a comment only people with kids got help after Ida Seniors didn't get any my house is still not fixed living with mold in some places my husband passed away a year ago and I have no money to fix my house I scrape by with hardly enough for groceries after my bills are Paid before he died we went see for Fema help and was refused because we had insurance that only put a roof on my house I know I'm not the only one with this problem .

**RESPONSE:** Thank you for your comment. You are encouraged to complete a survey with the Restore Louisiana Homeowner Assistance Program if you have not already done so. The survey is the critical first

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*For insured homeowners, we recommend contacting the Louisiana Department of Insurance for assistance with insurance complaints and assistance.*

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**COMMENT:** In my opinion, responsible and required use of the additional \$831.5M allocation in federal funding for recovery for Hurricane Ida and May 2021 storms should be spent as follows:

1. Helping the many that are underinsured in Louisiana, with special attention be paid to Southeast Louisiana and Washington Parish, as the latter was grossly underserved,
2. Case Management for Washington Parish and other rural areas of Louisiana that do not experience the same level of service that is currently extended to larger areas,
3. Community Canvas to ensure ALL populations have been served. So many in rural areas lack the knowledge base and understanding all the vast offerings of the program. It would help tremendously to spend much needed resources on extended out to rural areas and help fellow Louisianians.
4. Continued rental assistance for those that are displaced. Insurance and FEMA both have exhausted lodging offerings to homeowners and renters that continue to be displaced and would be otherwise homeless. This service should be extended regardless of income as this horrible disaster was by no fault of their own at all. If income plays a part at all, the scale should be more than liberal as insurance companies have grossly underinsured so many insurance companies have notified residents that they will not cover others after they rehabilitate their homes.

5. Investing in a team that will go out and explain Restore 20's offerings and actual help undereducated and/or overwhelmed citizens RESTORE their homes and their lives. Where comprehensive case management is touted, Washington Parish has, in particular, has not seen enough of that at all.
6. FREE Disaster Prep Kits for each parish. For instance, 265 INV prepares such kits for schools and hospitals in Texas as well as homeowner associations. Some of the offerings in the kit are basic mold kits (for people to test mold themselves), 4 sets of towels, wireless cell phone charger, basic COVID KITS (N95 masks, gloves, and eye protection, etc.) ([265investments.com](http://265investments.com)), first aid kit, paper towels, toilet tissue, waste disposal bags, 2 cases of water, water sanitation tablets (when potable drinking water runs out), basic personal hygiene kit), plastic sheeting, and other items as recommended by FEMA. Every registered household should be given kits for EACH member listed in their home. Recipients should be contacted twice a year to ensure they are still in possession of them BEFORE storm season. First one free. At specified cost thereafter.
7. Grant funding should be made available for those that still lack resources such as housing, child care assistance, crisis assistance, and insurance.
8. Funding to help Louisiana contract the proper companies in to facilitate and expedite these offerings. It is apparent that help is needed. Let's get ahead of the ball for a change rather than behind.
9. Expanding case management in rural areas (of which Louisiana has quite a few) year round via contracted assistance to canvas areas and help identify areas of the parish and homes that are most vulnerable BEFORE disaster strikes. Google Earth recently updated their data here in Washington Parish which will help tremendously as storm season approaches.
10. Develop a Storm Hit List of available contractors and their offerings. Contact them, make sure they are registered with Sam.gov and LaPAC pre-storm season.
11. Streamline bids listed in LaPac so more companies will bid. The current process is cumbersome and many simply throw their hands up and do not submit on RFIs, RFPs, nor RFBs. Only the essential as should be there. What the state of Louisiana needs should be made plain as well as what is expected.
12. 24- hour call number that can help those in need. Getting a voicemail or message when the only time a person may have to call is on the weekend or at night is the absolute most frustrating thing for a person in need and/or displaced.
13. Build sustainable housing rentals in rural areas (those prone to storm damage) so that people can stay there as opposed to different cities, away from their often away employment and families. Just a few sustainable rentals would help take the stress off of the hotels during this time. For instance, there are not enough safe and sustainable rentals in Washington Parish. Most people have to travel to St. Tammany or Mississippi for decent rentals when disaster strikes for emergency housing. 50 - 100 units here (split in each quadrant of the parish) would be ideal as people could keep most of their quality of life while being close to disaster-stricken properties while they reconstruct or renew their homes.
14. Ensure each school with a gymnasium and church with a life center capable of converting to a make-shift hospital or shelter has provided their capacity and stock need to the state of Louisiana as they will be needed during times of disaster.

Where this was lengthy, I know, these are just a few things I see that hold Louisiana back from being recognized across the U.S. as the great state it truly is. I have worked with companies all over to make them great. It's only right to do the same at home. I pray public comments are read and actually taken into account as storm season is upon us.

**RESPONSE:** Thank you for your comments. The state has conducted an in-depth analysis to determine unmet needs of residents, businesses and communities as we roll out recovery programs benefiting housing, economic revitalization and infrastructure efforts throughout the state. Additionally, since the Federal Register Notice stipulates how the state is to spend the allocated federal dollars, we must ensure compliance with these regulatory requirements and federal guidelines.

Further, the U.S. Dept. of Housing and Urban Development requires the state to ensure that 80% of the funds are spent in the most impacted disaster parishes, and the program currently anticipates having sufficient funding to serve all eligible homeowners impacted by Hurricane Ida.

Program representatives regularly travel to various impacted areas throughout the state to provide in-person assistance to homeowners who need help completing the survey or filling out the application. For a list of mobile support locations, visit [restore.la.gov/events](https://restore.la.gov/events).

The program offers ample resources for homeowners seeking more information about the program or those who may need assistance from a representative. We encourage you to visit the [Resources](#) and [FAQs](#) page on the program website, and additional questions can be directed to the program call center at 866.735.2001, open 8 a.m. – 5 p.m., Monday through Friday.

Throughout the application process, homeowners are provided with a specific case manager to ensure that their application moves swiftly and efficiently through the review process.

The Louisiana Housing Corporation is administering various rental recovery programs and you can find more information about those programs at [www.lhc.la.gov](http://www.lhc.la.gov).

Additionally, the Disaster Case Management (DCM) program is available to assist with a host of unmet needs including those suggested in the above comment. You can reach DCM providers for your parish by visiting [DCM - Hurricane Ida - Get a Game Plan](#). The provider that services the Washington parish area can be reached at 1-800-560-0200

**COMMENT:** I would like to share a comment on how to allocate the additional funds. Why not give the full amount to homeowners from their homeowners insurance of what they paid on our policies? Also, please consider we are still in a hardship from the Hurricane and the Covid virus.

**RESPONSE:** Thank you for your comment. The federal funds are only allowed to pay for “unmet needs”, which may or may not equate to a homeowner’s actual coverage amount in their policy. This additional gap funding covers eligible unmet needs after FEMA, SBA and insurance funds have already been provided.

Insured homeowners are encouraged to contact the Louisiana Department of Insurance for assistance with insurance complaints and assistance.

**COMMENT:** My husband was once an elementary and a junior high teacher in Lafourche and Jefferson Parishes but returned to his alma mater, Nicholls State University, and received his second Bachelors degree in Accounting, and his MBA and enjoyed his accounting job at Edison Chouest Offshore (aka Galliano Marine Service) previous to Hurricane Ida. I am a disabled former Cardiopulmonary Therapy Director and provided full time care for the previous 10 years (until June 28, 2021) for my younger brother who is now a quadriplegic but was once a paramedic in Northeast Texas.

We were by no means wealthy, but we were paying our bills.

In May of 2021, I had to have lumbar surgery requiring a fusion and a laminectomy and was unable to provide care for my brother, so he moved back to Northeast Texas to a nursing home to be near his grown kids and granddaughter in June of 2021—and thank goodness, since the tragedies that occurred as a result of unpreparedness of the nursing home in South Lafourche ( which claimed the life of my husband’s

grandmother.) We also lost my husband's grandfather and my older brother since Ida. So much loss and devastation for everyone here! My husband and I were very happy, before Ida, although I was in a great deal of pain (and in April of 2022, had to have additional spine surgery, a triple fusion, in my neck. Ida and its spin-off tornado struck our area of Cut Off and Galliano in August of 2021 and literally wrecked our lives and home. Our roof caved in over the master suite and foyer of our Galliano double wide mobile home, and the roof, attic, and ceiling, along with enormous amounts of insulation, all collapsed upon our brand new adjustable bed that we'd literally had for 10 days and still owe many thousands of dollars on it, (but it was a necessary expense, because, I've had 5 places in my spine operated on, and I must sleep while sitting up but now must use 5-6 pillows.) We had evacuated to Southwest Texas before the storm but saw the live footage of Lady of the Sea General Hospital, in Cut Off, which is very near our home, being destroyed on CNN while we were evacuated there. Since our returning home, our lives have been turned upside down. We sustained \$156K in damages to our home, and our insurance company (which I can't name) offered us \$29K, so we had to sue them, which was a grueling process, and in the meantime, my husband began to suffer debilitating depression, panic attacks, and chest pains, and in April of 2022, had to leave his job that he loved because of his depression and anxiety. My husband became self employed by going full time with his eBay store, dkd\_shop, but lost his health, vision, and life insurance, and 401K, and we have acquired a massive amount of debt by living off our credit cards since Ida and his job loss. I must also explain that I am disabled due to bipolar disorder, PTSD, panic attacks, and agoraphobia ( which means that my home was my happy place, and I did not feel at ease anywhere else, to say the least.) Therefore, I've lived in a constant state of anxiety since Ida but have had to stop my therapy with social worker, Ron Dantin, at Lady of the Sea Clinic in Cut Off, due to lack of funds. In addition, I literally have a screw coming loose in my titanium hardware in my triple neck/spine fusion and was referred to a pain specialist to go get an epidural injection (and also, I re-injured my neck due to tripping on the water hose that went from our home to our Ida Sheltering camper,) but I couldn't get the shot, because it is done only in a one day outpatient surgery center under anesthesia, and we've been literally counting pocket change for gas and/or food, so having to pay for outpatient surgery is out of the question, and so is the recommended physical therapy by my surgeon(s) from the AVALA hospital, in Covington, and so was the physical therapy that my husband was supposed to be continuing to receive for his fall in our Ida Sheltering camper shower, after his losing his health insurance. Now, my neck/spine damage is to the point where I have shooting pain from my right ear, down my neck, into my right shoulder, and down to the right elbow, but then having tremendous numbness from the right elbow down to my fingers, and I can't even lift little more than a gallon of milk with my right hand currently. My husband did not have medical insurance after he left Edison Chouest, and he had to go to the ER due to the slip and fall in our Ida Sheltering camper shower, which resulted in a bill that was over \$9K, counting the Ochsner St Anne ER facility and the separate ER physician statement. Our Ida Sheltering camper stay was a disaster of a different kind in itself, because our carbon monoxide detector was extremely frequently alarming; we ran out of propane often at inconvenient times at night in the winter; we had bugs, roaches, running rampant everywhere and couldn't spray for them due to the CO (carbon monoxide) detector; the camper caused our electric bill to be >\$600 one month; we had creaking and cracking in our 1/4 inch plywood underneath our camper bed and had to purchase two 6-inch foam mattress toppers for me to even sleep for 2-3 hours due to my post-op neck and back pain; but then finally, I was verbally harassed on the phone by an Ida Sheltering woman who was quite angry, because I had not called them to check in (when my husband had been meeting weekly with one of their representatives named Robert in person to inspect the camper, and Robert had told us that we only needed to deal with him for the remainder of the duration of our camper days,) but after we were told that we would have to begin paying rent this year, we called them and requested that they come and pick up the camper, and we moved into our 80% damaged, extremely moldy home in our guest bedroom as far away from the damage in our home as we could get. The Entergy rebates for Ida covered the New Orleans area but did not include the parishes that were most affected by Hurricane Ida, by the way, including Lafourche Parish. Now, we are still currently living in our guest bedroom in our home, and it wasn't until May—last month— that we were able to get a new roof and had all of the wet (from our leaking tarp after Ida, and the roof collapse) and severely molded sheetrock removed. We also in late April of this year, lost one of our very large wind turbines from a windstorm and didn't know it, but during the next rainstorm, we had water gushing



through the light fixture in our foyer and had it running through the walls, to our astonishment! My husband has had chronic bronchitis that lasted over 4 months, to the point that he would cough until he turned purple and had to go lie down under the fan for hours to catch his breath, so his self employment eBay work has suffered, and I've had bronchitis 3-4 times since Ida, also. My husband is supposed to be going to see a lung specialist and an allergy specialist, but again, we don't have any money for that either. This is very difficult to say, but we've gone from surviving well before Ida, to my having to sell all of my gold, silver, and diamonds—including my grandmother's vintage antique wedding ring that I was using as my own, that has been in my possession for 40 years, and we still are drowning in debt right now, but I have nothing left to sell. We can't afford our mental health and blood pressure medicines, (and my vitamins and supplements that are required since I had had a gastric bypass in 2005) and when we do buy those medicines, then we are neglecting other bills to do so. The truth is, we haven't been able to pay all of our bills every month since my husband had to leave his job.

We have been receiving a great deal of our food from Second Harvest, which is a food bank, with our church. My husband and I are both Sunday school teachers, as David teaches the adults, and I teach the pre-K through the second graders, and we love that so much! We are both suffering through physical and emotional pain. My husband and I separately owe Ochsner for many medical expenses, and I am becoming increasingly concerned and depressed (and distressed) due to all of these facts. We also owe Lady of the Sea General Hospital ER for a visit due to my husband's chest pain, and he was supposed to be seeing a cardiologist, but we can't afford that either, and that visit occurred when he had no insurance, so we owe them several thousands of dollars as well. We've been denied Medicaid and Ochsner's and LOSGH ER's financial assistance program repeatedly, solely based upon MY social security disability income alone, and my husband's previous much better income at Chouest, so, if we didn't have our strong faith in God, we'd feel absolutely hopeless, and I'm very, very worried, because my husband has \$100K in student loan debt that will begin to be due in August, so we can only receive money from eBay for quality goods sold—but that requires the money to buy the items that he sells from garage sales, flea markets, and/or thrift stores, and we've been so strapped for money to pay our bills already. We've had our internet turned off twice, and have had to use his cell phone to conduct eBay business by using his cellular data from his cell phone from AT&T. We've almost also had our water and electricity cut off a few times, too. Life is not fun nor easy any longer, but we're stuck in our current situation, until we can somehow catch up. Now, we're both living in fear of losing our home, because as a result of our lawsuit, while we were working on an SBA loan, (that we couldn't get after (husband) had to leave his job,) we were told to pay off our mortgage then by the SBA, and did, but were unable to pay for repairs to our home. We could not afford the SBA loan for 30 years, nor afford to replace the bed that we had just put on our credit card from Rooms to Go in Metairie any longer. In our settlement with our insurance company, we only received a check, that was not quite enough to pay off our mortgage, and we later learned that our check was including our personal property—but that was not specified, at that time, because our mortgage company would not have accepted the money if some of it was also for personal property, but that is a separate issue altogether. At the time of our settlement agreement, I was visiting my brother in Texas, for his only daughter's wedding in May of 2022, and I had just had the triple spine fusion in my neck a month before, and I was under the influence of very heavy narcotics, Oxycodone, and could scarcely understand what I was agreeing with, and I can prove it, because I electronically signed it on my phone, and I called my attorney several times to ask questions regarding the agreement, and she became so irritated with me, to my not understanding what I had signed, that she refused to accept my calls afterwards any longer and stated that she had explained it to me 5 times. My attorney didn't seem to understand that I was heavily medicated, enormously in pain, and in a constant state of shock due to my mental illnesses. The happiest part of all of this is that we were finally linked up with the Bayou Community Foundation, which has so wonderfully paid for our building materials for our roof, while the Amish CARE disaster relief group provided the labor for our roof job and for the removal of the moldy walls and ceilings, and we're so very extremely thankful to be having our home partially restored but simultaneously terrified of losing it all. I just had to cancel our cancer and accident insurance through AFLAC 3 days ago, also, but we literally began this month of June being -\$600 to -\$800 in the combination of both bank accounts. I'm feeling like we've been sinking deeper in debt every month, and we're going to have to begin paying on the student loan debt, in addition to everything, including my

husband's new medical insurance. The vehicle we drive is my brother's handicap accessible van, and I know that we cannot file for bankruptcy, because we'll lose his van, and probably our home, and I'd never forgive myself if that happened, especially to my younger brother's van. We've been married for 16 years and spent 10 of those years providing care to my quadriplegic brother, so we've had a very rough time. If anything, we are thankful that our marriage and friendship has grown much stronger together and stronger in the Lord, and for that, we are so blessed and grateful. Is there an answer to all of this? We are praying for the answers constantly but haven't found them yet but have not lost our faith in God. We just wish that the Hurricane had never happened. It destroyed soo much—too much...That's our story, and if you publish it, please withhold our names and very personal details, but please, share it, if it would help someone who is in authority or other survivors who can relate or help. I can prove that everything I have said is true and correct.

**RESPONSE:** Thank you for your comment, and thank you for sharing such a personal experiences about your recovery journey. We applaud your resilience during a difficult time of one disaster after another.

To ensure that you take the steps toward possibly receiving assistance from the Restore Louisiana Homeowner Assistance Program to rebuild or repair your home, or be reimbursed for repairs already completed, we ask that you complete a program survey if you have not already done so.

The survey is the critical first step toward receiving program assistance. To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

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Additionally, FEMA offers a Disaster Case Management (DCM) program which provides resources to address many of struggles you are currently experiencing. You can reach DCM providers for your parish by visiting [DCM - Hurricane Ida - Get a Game Plan](#)

**5/15**

**COMMENT:** I wouldn't recommend Louisiana homeowners apply to Restore LA for assistance. Personally, it was a waste of time for us. We own our home, we were living in our home at the time of hurricane Ida, We had wind damage for hurricane Ida. We have homeowners insurance with Louisiana Farm Bureau and flood insurance NFIP with Allstate. Unfortunately, our homeowners policy has a Wind & Hail Exclusion attached. So we got a denial letter from Farm Bureau for our wind damage claim. Flood insurance doesn't cover wind damage to your home the same as Homeowners insurance doesn't cover flood damage to your home. We filed with FEMA who also gave us a denial letter, we filed an appeal with FEMA it was also denied. Reason:

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FEMA is not a substitute for insurance. We did the Restore LA survey and were not invited to fill out an application, denied. We filed an appeal with Restore LA, also denied. Reason: We collected over \$ 25,000.00 in insurance money. This is where the confusion comes into our story. We own our home, we were living in our home at the time of hurricane Ida, and for the first time in 39 years our house flooded for hurricane Ida. The flood waters settled at 16" and sat there for 5 days, long enough for the mud to settle and mildew starting to grow. We filed a claim with our NFIP flood policy, Allstate and they eventually paid us \$ 114,000.00 for structure, flood damage. \$ 114,000.00 is less than half of our policy coverage of \$ 250,000.00 for structure, flood damage. At the end of the day, we have to use our Allstate NFIP flood insurance money to repair the interior flood damage to our home AND the exterior wind damage to our home. Everyone has denied us assistance/funding. Louisiana needs to clarify the survey and/or application. When I filed with FEMA and Restore LA for the wind damage; I couldn't say that I didn't receive insurance money because I did receive insurance money. The insurance money is for the flood damage, NOT the wind damage. I have a denial letter for the wind damage. There's no way to separate your flood damage and your wind damage on paper to get any assistance. Example: If I say No I didn't get insurance money and the state does research and finds I did get insurance money. I would get into trouble for lying. It's not worth the trouble, but it's not right. It's just frustrating when the State of Louisiana is getting all this money from the federal government to help residents recover from these storms and here you are having to pinch pennies to repair your house and do the work yourself because your flood money has to pay for everything. When we should have qualified for assistance with the wind damage. Our out of pocket paid so far for the wind damage repairs are almost \$ 7,000.00 This is a true story, Copies of our denials, appeals, insurance money, elevation issues are on file with FEMA, Restore LA or the ida sheltering program. Bottom line: Get some clarity to separate wind damage and flood damage. Residents have to buy 2 policies, 1 for wind and 1 for flood.

**RESPONSE:** Thank you for your comment. Currently, there is a limit of funding and a cap for assisting applicants who have received assistance from insurance companies as the first source of recovery assistance. As the program is designed to prioritize residents with the greatest unmet need, priority is given to homeowners who received little to no assistance from other funding sources. However, the program has raised the maximum allowable amount of insurance received from \$25,000 to \$50,000.

Insured homeowners are encouraged to contact the Louisiana Department of Insurance for assistance with insurance complaints and assistance.

**COMMENT:** Thank you for the informative session this morning. Public input is so crucial to improving the recovery process. My recommendations and comments.

1. HUD Certified Housing Counseling Agencies should be included in the recovery process. We are located in every area of this State working to counsel, educate, train and inform families about resources to help them through any recovery process. We are booths on the ground, 24 hours a day working in our neighborhoods and communities to help people acquire, rebuild and remain in their homes. Families feel most comfortable working with professionals in their communities. A partnership with OCD is long overdue. Hurricane Recovery is a local issue!

**RESPONSE:** Thank you for your comment. Through an established partnership with the Louisiana Housing Corporation, OCD continues to partner with Housing Counseling Agencies in several housing programs, most recently the Louisiana Emergency Rental Assistance Program and the Louisiana Homeowner Assistance Fund. A list of housing counseling agencies and legal service partners can be found [here](#).

2. Housing Stock, the nation has a housing deficit of 3.1 million homes. In Louisiana, the housing stock is low. We have been successful using the soft second program since 2000. The unmet need at this time is

housing supply. I would like to see a Pilot Resilient Housing Program requiring all rehab and new construction homes to use sustainable products. I serve on the Louisiana Homeownership Think Tank committee, a program operating under LHC. We just completed a study on building homes to withstand 180 hurricane winds. Like to share this information with OCD.

**RESPONSE:** Thank you for your comment. OCD has been committed to leading the way in implementing the use of resilient sustainable products in several completed housing projects and is also represented on the Louisiana Homeowner Think Tank Committee. Single family and multifamily housing projects, which include reconstruction or new construction, require fortified gold standard certifications along with energy green requirements. For more information, see the Green Building Checklist, Fortified Construction Checklist and the Fortified Roof Repair Checklist on the [Resources](#) page of the program website.

3. I am sure HUD is exhausted with our climate woes. It is up to us to use their funds to assure them we can withstand climate changes and therefore, build back faster and stronger. HUD is actually recommending we use manufactured housing. This is in my Scalable Housing Models Report.

**RESPONSE:** Thank you for your comment. OCD is committed to identifying sustainable solutions and path forward to address issues with climate change within several programs as outlined in the Master Action Plan.

4. We know mobile homes cannot withstand strong winds, we know which areas of our State will continue to get hit, now is the time to take the leadership to let HUD and FEMA know what we know.

**RESPONSE:** Thank you for your comment. OCD is committed to building storm-grade homes and infrastructure that will withstand future disasters, and continues to take strides in statewide mitigation activities to prevent historic levels of damage from previous disasters in the future. Additionally, the State routinely participates in HUD problem solving workshops and openly shares our knowledge and key learnings from our recovery efforts and experiences.

5. Honestly, as a HUD Certified Housing Counseling Agency, we have heard horror stories about the Restore process. Very few low wealth families know how to use technology, cell phones etc, and decide to opt out. There were no direct intake walk-in centers in New Orleans, Killona, yet the Jefferson parish Library had a walk-in center. We are a Restore partner working in Killona in St. Charles Parish, helping to get the word out. We managed the Plaquemines Parish Happi Program, educated 600 families to purchase homes using soft-second and was first on the ground to help families prevent foreclosures after Katrina. We traveled with OCD to Metairie, Lafitte and Lake Charles sharing resources and providing guidance. There are many other options to help families during recovery. We should all be on the same page. We just helped a single parent in Lafourche purchase a home using the USDA 502 direct loan funding. She lost her mobile home.

**RESPONSE:** Thank you for your comment and for your commitment to the local community. The program does offer in-person support at various locations in impacted areas throughout the state for homeowners needing assistance. For a list of mobile locations, visit [restore.la.gov/events](https://restore.la.gov/events).

We also encourage homeowners who may not be able to submit a survey or application via computer, smartphone or tablet to contact the program call center at 866.735.2001 between 8 a.m. – 5 p.m., Monday through Friday, where representatives will be able to help them over the phone. **The deadline to complete the survey is Tuesday, August 1, 2023.**

6. Through times like these, we should be unified instead of being divided. I've witnessed favoritism during Katrina and seeing the same patterns with the recent storm recovery methods. It really shouldn't have to be this way if we just partner.

**RESPONSE:** Please visit the [program website](#) which offers many resources to address your comments above along with FAQs and policy and procedures for the Restore Louisiana Homeowner Assistance Program. HUD requires to ensure that 80% of the funds are spent in the most impacted disaster parishes, and the program currently anticipates having sufficient funding to serve all eligible homeowners impacted by Hurricane Ida. The program offers case management support to all eligible applicants participating in the program.

7. Finally, I appreciate the information, love the charts and explanation of use of funds. What I see missing from the plan is Using HUD Certified Housing Counseling Agencies to help families understand the Restore process and increasing resilient, sustainable housing supply stock to promote homeownership. I will remain engaged.

**RESPONSE:** Thank you for all the points mentioned in your comments. OCD continues to engage with local partners and stakeholders who serve our communities. We appreciate your commitment and the resources provided to local survivors.

6/19

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**COMMENT:** I suffered major damages from hurricane Ida. Fema came and assets my damages at \$9000.00, this gave me enough to repair, not replace my roof, and started leveling my foundation, I lost 5 major appliances, washer dryer water heater (replaced) central a/c and heat (bought window units) my utility pole for electrical meter pan (replaced) and sewage treatment damage (replaced pump) I had a 16x20 porch with a 12x12 utility room which was picked up and slammed it against my home. Suffering damage including broken windows, tore vinyl siding, and flashing. None of which has been repaired. I qualified for a grant to purchase a new mobile home, but could not afford a loan to cover extra things such as permits, hook ups, towing the old unit off etc. My simplified action report would be a plan to fix my utility room so I can set up new appliances. I am currently using a borrowed set in my shed. I would like to see an access including a mobility handicap ramp among other things. I am disabled, I receive a minimal amount of SSI. I do have mold on my ceiling and damage to a section of a bedroom wall. I also need a cover for my water heater.

**RESPONSE:** Thank you for your comment. You are encouraged to complete a survey with the Restore Louisiana Homeowner Assistance Program if you have not already done so. The survey is the critical first step toward receiving program assistance. To complete the program survey, visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

The program's intent is to provide grant assistance – prioritizing vulnerable, low-to-moderate income (LMI) households – to homeowners impacted by Hurricanes Laura, Delta and Ida and/or the May 2021 Severe Storms.

The program policy manual, which can be found on the [program website](#), outlines policies related to what is covered under the homeowner grant. The program does provide assistance for disabled households.

6/22

**COMMENT:** I would like to recommend an appropriation / expenditure from Amendment 3. The governor signed SB 147 into law as [Act 259](#), however, the appropriation for this program was deleted from HB 1. The appropriation was partial funding (\$5 million) toward the one-time seed money needed (a total of \$8.71 million) to get this self-insurance program off the ground. Once operational, it would be funded by premiums from participants. This measure is critical to the faith community, because the three major insurers for churches are either exiting the state (Church Mutual) or being so selective and raising premiums so high that congregations cannot afford to protect their properties against potential casualties from storms (Brotherhood Mutual and GuideOne). I represent 1,600 congregations of the Louisiana Baptist

Convention. However, the United Pentecostal Church (500 churches), Assembly of God (300 churches) and Louisiana Home & Foreign Missions Baptist State Convention (200 churches) have been working together on this issue. Others are being kept informed. Likewise, 9 faith-based universities (LAICU) are engaged with us on the matter. This should be a priority project for funding in Amendment 3.

**SAME COMMENTER (6/27):** I would like to recommend an appropriation / expenditure from Amendment 3.

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This should be a priority project for funding in Amendment 3.

**SAME COMMENTER (6/30):** I apologize for adding another email to the exchanges we have had, but the information below helps explain that the state and federal governments benefit from the spiritual impact churches have in Louisiana, **and also receive financial benefits from in-kind services we provide through our many compassionate ministries to local communities.**

First, please understand that the 1,600 churches of the Louisiana Baptist Convention are not a denomination, but a voluntary fellowship of congregations. There is not a top-down relationship in terms of authority. Instead, we have a bottom-up relationship defined by the churches (1) making free-will contributions to support ministries at the parish, state, and national levels and (2) voting to give direction to these jointly supported ministries.

In that context, I have attached a spreadsheet ("Disaster Relief (Hurricane Ida)") that details the work led by Louisiana Baptists and assisted by sister state Baptist organizations in response to Hurricane Ida.

Using the volunteer hourly rate of \$31.80 as estimated by the *Independent Sector*, the 188,827 work hours contributed by Louisiana Baptists (and the volunteer Baptists we hosted at our churches) provided more than a **\$6 million** benefit to the state after Ida. Additionally, the 738,979 meals we prepared, based on a notional value of \$5 each, resulted in another **\$3.9 million** of assistance to the people of Louisiana at no cost to the state.

Our folks rallied in similar fashions to aid the people of Louisiana after Hurricanes Laura, Delta and Zeta, too.

Through our Baptist Friendship House in New Orleans, in 2022, Louisiana Baptists gave out **\$935,927 of in-kind resources to homeless persons, poverty-stricken families, and women and children rescued from human trafficking.**

Our state transitional living ministry in Monroe provides on-campus housing to homeless children and their mothers for a savings to the state of about **\$300,000 annually**. Meanwhile, our foster care ministry benefits the state by another **\$192,000 per annum**. Also, we just announced plans to open a regional compassion ministry center in Monroe that will provide weekend food backpacks and school supplies for about 25,000 children – **an estimated in-kind yearly value of \$750,000**.

The New Orleans Baptist Theological Seminary four-year program at the Louisiana State Penitentiary in Angola has conferred 478 degrees since 1995 at an estimated in-kind **value of more than \$15,000,000**. Moreover, the educational effort has been credited with helping to form 30 congregations on the prison grounds. A former prison official estimated that 4,000 of the 6,000 prisoners have professed Christ as Savior. Importantly, the seminary extension center has been credited with transforming Angola from “the bloodiest prison in America” to a prototype facility; and the faith-based degree program has been replicated in San Quentin State Prison in California, Darrington Unit (a state maximum security prison) in Texas, Mississippi State Prison (Parchman), Phillips State Prison in Georgia, as well as the Louisiana Correctional Institute for Women (St. Gabriel).

These are some of the larger cooperative ministry efforts by our 1,600 congregations. But there are hundreds of local ministries (by individual congregations or by the combined churches in a parish), including benevolence relief (utility bills and groceries), addiction recovery, and job training for men and women.

There are similar levels of ministry by the 500 United Pentecostal Church congregations, 300 Assemblies of God churches, 300 members of the Louisiana Missionary Baptist State Convention, 200 affiliates of the Louisiana Home and Foreign Missions Baptist State Convention and the large number of non-denominational ministries, too.

***I received the attached spreadsheet, "DS Report (La. AOG)," from the Louisiana Assembly of God state office. They shared that 9,000 of their members volunteered in these extended disaster response efforts from 2020-2023, and provided more than \$12.5 million in direct financial benefit to Louisiana citizens.***

Of course, there also are large-scale ministries performed by the 550 Catholic parishes. I understand that they participate in the Catholic Mutual self-insurance program. However, they would be eligible and welcome to join the Louisiana church self-insurance program. Importantly, the Louisiana Conference of Catholic Bishops has been supportive of our effort to set up this self-insurance program.

Then there are the several pregnancy care centers that generally are supported multi-denominationally and help mothers and their unborn children during the pregnancy, and in some instances up to two years after the babies are born (hygiene products, diapers, formula, clothes, food, housing assistance, and in some cases healthcare, among other resources)

As for the scope of the insurance problem, just among Louisiana Baptist churches, we estimate about 600 are vulnerable because of the state insurance crisis. It would be reasonable to estimate that the other church groups are facing similar ratios of congregations in insurance distress.

So, you can see **the potential crippling impact from a significant loss of church resources that now fill essential needs of large vulnerable populations at no cost to the state.**

Please help us find funding for a one-time appropriation of \$8.71 million to seed the church self-insurance program authorized by SB 147 / Act 259.

Row Labels	Sum of In-Kind Value
2020 Hurricane Delta	215580.29
2020 Hurricane Laura	2742090.81
2020 Hurricane Zeta	142626.71
2020 Monroe, LA Tornado	55952.24
2021 Hurricane Ida	9334956.87
2022 New Orleans Tornadoes	65350.56
2022 Southeast Tornadoes	65039.78
2023 Southeast LA Tornado	6897.68
<b>Grand Total</b>	<b>12628494.94</b>

As of 12/31/21	Professions of Faith	Gospel Presentations	Sum of Volunteer Days - Total	Sum of Work Hours	Total Contacts	Bibles Distributed	Total Meals Prepared	Sum of Meals Served	Assessments	Heavy Equipment Hours	Sum of Chainsaw Jobs	Sum of Crisis Buckets Distributed	Sum of Tear Out	Sum of Pressure Wash	Sum of Mold Remediation	Sum of Debris Removal	Sum of Temporary Roofing	Showers	Laundry Loads	Sum of Water Purified (Gals)
<b>August 2021 - Hurricane Ida</b>	<b>242</b>	<b>1090</b>	<b>22307</b>	<b>188827</b>	<b>14193</b>	<b>1413</b>	<b>783979</b>	<b>14788</b>	<b>4231</b>	<b>3669</b>	<b>1028</b>	<b>148</b>	<b>114</b>	<b>8</b>	<b>77</b>	<b>52</b>	<b>377</b>	<b>13472</b>	<b>8392</b>	<b>39003</b>
LA - Lake Charles, Trinity Baptist Church	0	0	4	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LA - Forest Hill, Tall Timbers Conference Center	0	0	450	5005	12	0	572	0	0	0	0	0	0	0	0	0	0	0	0	0
LA - Gonzales, Lamar Dixon Expo Center	0	20	933	9080	244	13	204862	2	4	2	0	0	0	0	0	0	0	0	836	710
LA - Mandeville, First Baptist Church	7	55	2209	19608	1950	277	31432	14617	385	236	193	140	21	4	17	3	17	2348	1252	0
LA - Gonzales, Ascension Baptist Church	3	36	1229	12359	1404	63	119390	207	201	33	0	0	0	0	0	1	1	1076	755	0
LA - Hammond, Woodland Park Baptist Church	41	179	2179	17027	1185	206	56995	353	548	186	0	3	0	3	12	42	1507	649	0	0
LA - Kentwood, First Baptist Church	33	65	633	5134	685	10	1464	251	0	80	0	1	0	0	183	0	0	0	0	55
LA - New Orleans, Salvation Army Site	0	0	78	479	3	0	5500	0	8	2	0	0	0	0	0	1	0	0	0	0
LA - Morgan City, Bayou Vista Baptist Church	51	203	2638	22142	1201	89	75272	591	356	74	0	22	1	13	8	11	2133	845	0	0
LA - West Monroe, McLendon Baptist Church	0	0	28	280	90	0	0	0	0	0	0	0	0	0	0	0	0	0	0	121
LA - Belle Chasse, First Baptist Church	11	91	1270	10314	1311	131	3488	482	232	92	0	11	2	7	0	7	944	392	0	0
LA - New Orleans, First Baptist Church	1	1	1651	14326	564	5	186835	0	599	0	0	0	0	0	2	4	1107	963	0	0
LA - Denham Springs, First Baptist Church	1	44	266	1870	344	52	658	12	74	5	0	0	0	0	0	1	144	70	0	0
LA - St. Amant, New River Baptist Church	28	107	3080	25622	1178	259	7385	171	499	1485	254	8	20	0	12	0	9	2198	1476	39003
LA - Metairie, Metairie Baptist Church	22	79	2271	16473	496	82	5468	246	0	0	0	0	0	0	0	4	50	0	0	0
LA - Lake Bistineau State Park	0	0	8	80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	160
LA - Kenner, Williams Blvd Baptist Church	0	0	22	220	0	0	4960	0	0	0	0	0	0	0	0	0	0	0	0	0
LA - Houma, Coteau Baptist Church	7	47	739	6907	690	84	1578	164	108	34	0	9	1	3	5	42	391	222	0	0
LA - Monroe, Community Center	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	120
LA - LaPlace, First Baptist Church	2	23	42	391	615	0	0	0	1	0	0	0	0	0	0	1	0	0	35	233
LA - Covington, First Baptist Church	2	5	724	3946	181	48	0	287	276	16	0	4	0	2	15	2	0	0	0	0
LA - Morgan City, First Baptist Church	0	4	228	2045	154	5	99	69	72	16	0	6	0	5	0	2	0	0	0	0
LA - Houma, Rouses Market	0	14	553	4868	854	0	74527	0	0	0	0	0	0	0	0	0	0	0	0	0
LA - Minden, Harris Baptist Assembly	0	0	10	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	52
AL - Mobile, Ida Shelters	0	0	2	20	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LA - Golden Meadow, First Baptist Church	33	112	968	9571	1010	87	2237	83	47	33	0	17	0	15	0	5	753	317	0	0
LA - Jean Lafitte, Barataria Baptist Church	0	0	57	570	12	0	1257	1	0	0	0	0	0	0	0	0	0	0	0	0
LA - Walker, Walker Baptist Church	0	5	35	357	5	1	0	0	22	7	0	0	0	0	0	0	0	0	0	1
<b>Grand Total</b>	<b>242</b>	<b>1090</b>	<b>22307</b>	<b>188827</b>	<b>14193</b>	<b>1413</b>	<b>783979</b>	<b>14788</b>	<b>4231</b>	<b>3669</b>	<b>1028</b>	<b>148</b>	<b>114</b>	<b>8</b>	<b>77</b>	<b>52</b>	<b>377</b>	<b>13472</b>	<b>8392</b>	<b>39003</b>

**RESPONSE:** Distribution of federal funding on behalf of Restore Louisiana recovery programs is required to address unmet needs of residents, businesses and communities throughout the state affected by 2020-21 disasters. While funding is available to support recovery efforts related to housing, infrastructure and economic revitalization in impacted areas, the Federal Register Notice stipulates how these funds are to be spent. For a list of available programs, visit the [restore.la.gov/programs](https://restore.la.gov/programs).

While the creation of a self-insurance program authorized under the newly enacted provisions of LSA R.S. 22:472.1 – 472.20 is a worthy goal, there are limits to the use of CDBG-DR funds which prevent providing the capital to fund the trust fund required under the provisions of those statutes. Similarly while the value of in-kind services / philanthropic activities may sometimes be utilized in having a nonprofit meet various nonfederal match requirements, those services are generally not eligible for reimbursement retroactively



with CDBG-DR funds. Additionally, congregants who have been impacted by 2020-21 disasters are encouraged to complete the program survey if they have not already done so. The survey is the critical first step toward receiving program assistance. To complete the program survey, homeowners can visit [restore.la.gov](https://restore.la.gov) or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

5/30

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**COMMENT:** Representatives from the City of Thibodaux’s administration attended the Louisiana Office of Community Development public hearing that was held on Thursday, June 15, 2023. The City of Thibodaux supports the state’s action plan amendment to spend the additional \$831.5 million allocated by the U.S. Department of Housing and Urban Development for Hurricane Ida and the May 2021 Severe Storms. The City of Thibodaux identified a need to seek funds to help our community recover from the devastating effects of Hurricane Ida. The City of Thibodaux’s intent is to utilize three of the HUD CDBG-DR categories (long term recovery, housing, and economic revitalization) in the recovery of a HUD Opportunity Zone, specifically the Martin Luther King Jr. (MLK) Park within the City of Thibodaux (which is recognized as a federal HUD Entitlement Community). The City of Thibodaux is prepared to apply for funds allocated under the “Resilient Communities Infrastructure Program.” Not only did the MLK Park suffer substantial damage, it was the only location available for a temporary debris management site for construction and demolition debris citywide. In the process of long term recovery, it is the desire of the COT to do two things: bring the MLK Park back to pre-storm status and establish a central community operation center at MLK Park through HUD CDBG-DR that will transform the method in which the COT provides services. In addition, MLK Park has the potential to be utilized as a second regional LDH medical open POD as well as a primary LANG Food POD site that would transition to a DCSFS DSNAP POD in response to a storm. During a storm the City of Thibodaux will also use the inside of the complex for a regional staging site for medical first responders while staging for public safety first responders will be done at a different City facility. The Park is located adjacent to two low-income housing complexes, a public housing site, and is located within walking distance to one of the City’s LMI target areas.

**RESPONSE:** Thank you for your comment. Funding is available for local governments to support recovery efforts related to housing, infrastructure and economic revitalization in impacted areas. For a list of available programs, visit the [restore.la.gov/programs](https://restore.la.gov/programs).

The Resilient Communities Infrastructure Program is designed to provide funding for local governments to develop large-scale mitigation activities that allow Louisiana communities to better withstand future disasters. Lafourche Parish was allocated funds for eligible projects. The city should contact the parish to discuss eligible projects for use of the allocated funds. Additional information regarding the program details and the use of the allocated funds can be found [here](#).

#### LAST DAY (7/6) PUBLIC COMMENTS 20-21 STORMS APA3

**COMMENT:** The Regional Planning Commission is submitting the attached public comment in response to Substantial Action Plan Amendment No. 3 in Response to 2020 and 2021 Federal Declarations. The text of the comment is also copied below:

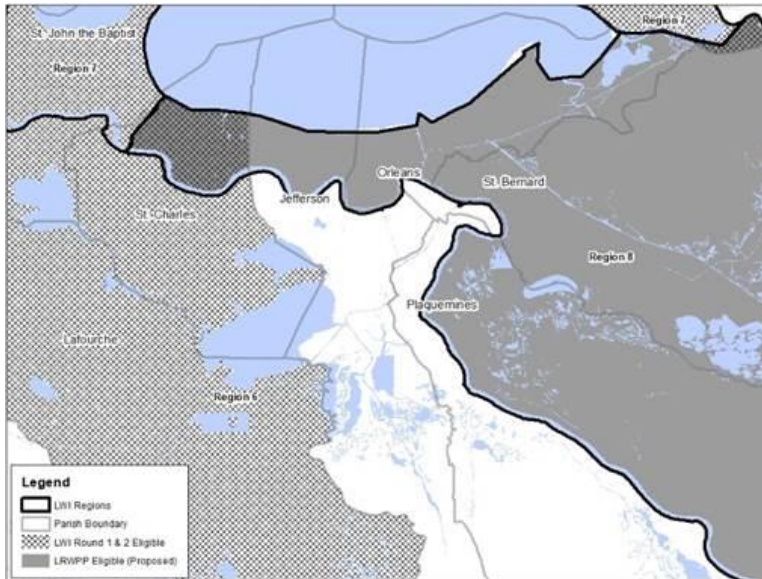
The Louisiana Office of Community Development (OCD) has proposed an amendment to its Master Action Plan for Hurricanes Laura, Delta and Ida, and the May 2021 Severe Storms. This amendment, Amendment 3, is a response to additional funding allocated for Hurricane Ida and the May 2021 Severe Storms as part of the Continuing Appropriations Act, 2023 (Pub. L. 117-328). The Amendment revises budgets in the Action Plan and establishes new programs, including the newly created Local and Regional Watershed Projects and

Programs (LRWPP). The LRWPP would allocate \$20 million “to implement identified projects with demonstrable and quantifiable mitigation outcomes” within the Louisiana Watershed Initiative (LWI) Region 8. We are writing to express our concern with portions of the LRWPP as currently described in Amendment 3.

As fiscal agent and lead agency in LWI Region 8, the Regional Planning Commission (RPC) supports the creation of the LRWPP. However, as currently described in Amendment 3 the LRWPP would not provide project funding to many areas of the state most severely impacted by Hurricane Ida, specifically the portions of Jefferson, Orleans, and Plaquemines Parishes west and/or south of the Mississippi River (the “west bank”). HUD identified each of these parishes as being among the Most Impacted and Distressed (MID) from Hurricane Ida; however, LWI Region 8 only includes the portions of these parishes east and/or north of the Mississippi River (the “east bank”). Since the language in Amendment 3 specifically states that LRWPP funds will be limited to Region 8, the west banks of these MIDs would be ineligible for LRWPP funding.

Importantly, Jefferson, Orleans, and Plaquemines Parishes were also not directly eligible for LWI Round 1 or 2 project funding. Those funding rounds were established in the Action Plan for the Great Floods of 2016, and eligible projects must have shown a benefit to one of the MIDs from that event. Neither Jefferson, Orleans, nor Plaquemines Parish were declared MIDs from the 2016 floods, and no eligible projects could be identified within those parishes that would also benefit a 2016 MID. As such, Jefferson, Orleans, and Plaquemines Parishes have not received LWI Round 1 or 2 funding. Since Amendment 3 would also explicitly exclude the west banks of Jefferson, Orleans, and Plaquemines Parishes from LRWPP funding, it would leave these areas without funding from LWI Rounds 1 and 2 and ineligible for LRWPP. This would create a substantial gap in funding availability for these communities even though they were severely impacted by Hurricane Ida.

The map below shows which parishes were directly eligible for LWI Rounds 1 and 2, and the area that would be eligible under LRWPP. As described above, the west banks of Jefferson, Orleans, and Plaquemines Parish are currently ineligible for each type of funding.



The RPC requests that the proposed Amendment 3 be revised prior to approval by HUD to make the entirety of Jefferson, Orleans, and Plaquemines Parishes eligible for LRWPP funding. Neglecting to include the entirety of these parishes in the program would constitute a major oversight. More importantly, it would exclude communities severely impacted by Hurricane Ida from potentially critical mitigation funds.

We welcome feedback and response from HUD and OCD, and appreciate your consideration of this request.

The Louisiana Office of Community Development (OCD) has proposed an amendment to its Master Action Plan for Hurricanes Laura, Delta and Ida, and the May 2021 Severe Storms. This amendment, Amendment 3, is a response to additional funding allocated for Hurricane Ida and the May 2021 Severe Storms as part of the Continuing Appropriations Act, 2023 (Pub. L. 117-328). The Amendment revises budgets in the Action Plan and establishes new programs, including the newly created Local and Regional Watershed Projects and Programs (LRWPP). The LRWPP would allocate \$20 million "to implement identified projects with demonstrable and quantifiable mitigation outcomes" within the Louisiana Watershed Initiative (LWI) Region 8. We are writing to express our concern with portions of the LRWPP as currently described in Amendment 3.

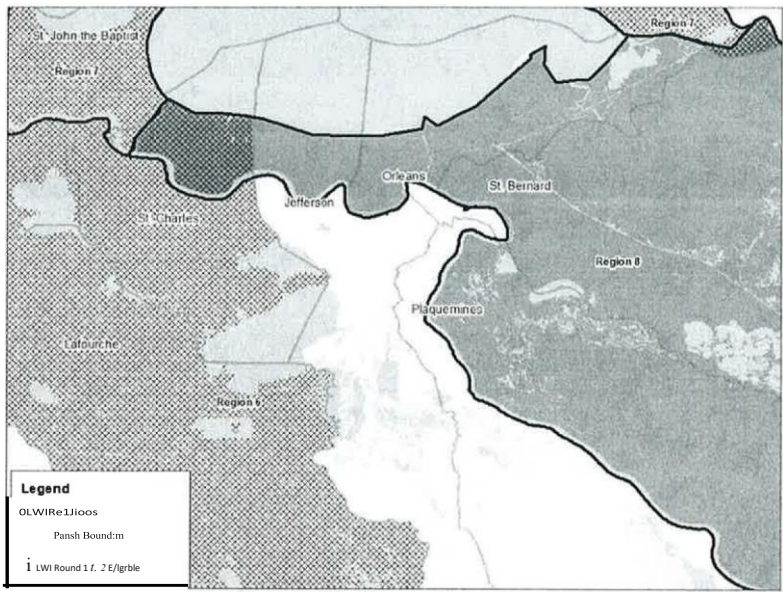
As fiscal agent and lead agency in LWI Region 8, the Regional Planning Commission (RPC) supports the creation of the LRWPP. However, as currently described in Amendment 3 the LRWPP would not provide project funding to many areas of the state most severely impacted by Hurricane Ida, specifically the portions of Jefferson, Orleans, and Plaquemines Parishes west and/or south of the Mississippi River (the "west bank"). HUD identified each of these parishes as being among the Most Impacted and Distressed

(MID) from Hurricane Ida; however, LWI Region 8 only includes the portions of these parishes east and/or north of the Mississippi River (the "east bank" ). Since the language in Amendment 3 specifically states that LRWPP funds will be limited to Region 8, the west banks of these MID's would be ineligible for LRWPP funding.

Importantly, Jefferson, Orleans, and Plaquemines Parishes were also not directly eligible for LWI Round 1 or 2 project funding. Those funding rounds were established in the Action Plan for the Great Floods of 2016, and eligible projects must have shown a benefit to one of the MID's from that event. Neither Jefferson, Orleans, nor Plaquemines Parish were declared MID's from the 2016 floods, and no eligible projects could be identified within those parishes that would also benefit a 2016 MID. As such, Jefferson, Orleans, and Plaquemines Parishes have not received LWI Round 1 or 2 funding . Since Amendment 3 would also explicitly exclude the west banks of Jefferson, Orleans, and Plaquemines Parishes from LRWPP funding, it would leave these areas without funding from LWI Rounds 1 and 2 and ineligible for LRWPP. This would create a substantial gap in funding availability for these communities even though they were severely impacted by Hurricane Ida.

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Neglecting to include the entirety of these parishes in the program would constitute a major oversight. More importantly, it would exclude communities severely impacted by Hurricane Ida from potentially critical mitigation funds.

We welcome feedback and response from HUD and OCD, and appreciate your consideration of this request.

**RESPONSE:** Thank you for your comment. The state will modify the program description to include region 8 and the HUD MID parishes of Jefferson, Orleans, Plaquemines, St. Mary and Terrebonne. These IDA HUD MID parishes were not eligible for the CDBG-MIT grant funds, and this will enable those areas to implement mitigation projects in alignment with the Louisiana Watershed Initiative.

**COMMENT:** Southeast Louisiana Legal Services (SLLS) has a unique vantage point of the eligibility challenges faced by low-income disaster survivors applying for federal disaster assistance. We represent disaster survivors in 22 parishes of the state; all of the parishes we serve were in the Ida Disaster Declaration. Over the last year and a half since Hurricane Ida, we have assisted hundreds of individuals with legal issues related to the disaster, including those dealing with FEMA eligibility, housing rights, contractor fraud, title clearing and eligibility issues with Louisiana's CDBG-DR programs. We make the following recommendations based on issues our clients and community has faced throughout the numerous disasters impacting Louisiana over the last 20 years. These recommendations incorporate and supplement the previous recommendations made in our July 1, 2022 comment on Amendment 1 to the Action Plan.

**Rental assistance programs:**

In general, SLLS applauds OCD for applying lessons learned from past disasters and striving to create more equity in the recovery process by equally prioritizing renters and homeowners. Data in the Action Plan shows that renters were equally, if not more affected by the 2020 and 2021 storms than homeowners. Fifty percent of FEMA registrants after these storms were renters, and 52.6% of damaged housing units were renter-occupied. Many renter families remain in FEMA assisted housing and will become homeless when the program terminates in August, 2023. These families will experience housing costs in excess of their pre-storm costs on the private rental market because (1) post-storm rent-inflation has affected many jurisdictions due to widespread damage and resulting mismatch in supply and demand; and (2) decrease in subsidized housing units due to storm damage. Indeed, low-income SLLS clients in Terrebonne Parish who lived in public housing that was damaged in Hurricane Ida, and has not yet been rebuilt, have not been provided with usable replacement subsidies and will have nowhere to go once the FEMA programs terminate. Therefore renters should enjoy a proportional allocation of rental assistance funds. For the most part, OCD's proposal achieves this goal. SLLS offers some program-specific comments below.

SLLS applauds the infusion of \$8.4 million into the Permanent Supportive Housing program and \$10 million into the Rapid Rehousing program. Both of these programs are invaluable resources for SLLS clients. In the Rapid Rehousing program funds may be used for up to three months of rental assistance, or up to 24 months, with a waiver, security deposits, rental and utility arrearages, and application and background check fees charged when applying for housing. Households qualify if homeless or individuals living in hotels or temporary FEMA housing. SLLS is concerned that these programs exclude an important group of housing

unstable individuals, namely those who are not people with disabilities and therefore ineligible for PSH, and who are severely housing unstable but not homeless by HUD's definition. For example, SLLS has clients with young children who are living doubled up with family, severely cost burdened, or living in unsafe or uninhabitable living conditions post-disaster. These families are also in desperate need of rental assistance. SLLS recommends that OCD expand the definition of "housing unstable" to include families that are doubled up, severely cost burdened, or living in uninhabitable living conditions post-disaster. This category should include families who received a project-based HUD or USDA subsidy pre-storm, whose housing was damaged, and who have not been provided with an adequate replacement subsidy.

In addition, the limit of \$1,000 may not be enough to support some larger families in more expensive parishes with little to no income. For example, the 2023 FMR for a three bedroom unit in Orleans Parish is over \$1,500. OCD should allow exceptions to the \$1,000 max for qualifying families.

#### **Rental housing development programs:**

SLLS applauds OCD's allocation of funds through the **Middle-Market Loan Program** and **Resilient Mixed Income Piggyback Program** to provide gap financing for new affordable multifamily housing construction that will support low and moderate income families. The affordable housing shortage for LMI renters is extreme, and was only exacerbated by the 2020 and 2021 storms. Infusion of funds into multifamily construction will help replete the rental housing stock and ensure that low income renters have safe, habitable, affordable housing options. The requirement of disaster resilient construction in the Piggyback program is notable. SLLS recommends OCD invest in long-term affordability, and increase the minimum affordability period for both of these programs from 20 years to a minimum of 30 plus years, with incentives for longer affordability periods. This will help provide long-term stability to the rental housing market. This is especially critical as a number of post-Katrina funded LIHTC properties that received awards before LHC eliminated the ability to seek a Qualified Contract after 15 years reach their sunset dates.

Similarly, OCD should impose longer affordability periods for the **Rental Restoration and Development Program** (formerly called the Neighborhood Landlord Rental Program). The HOME affordability periods ranging from 5 to 20 years depending on the size of the project are inadequate. After Katrina landlords in the Road Home Small Rental Program were typically subject to a 10 year affordability period. SLLS found that this 10 year period was grossly inadequate to create stability in the rental housing market. SLLS recommends that any projects receiving funds through this Action Plan be bound by a minimum 30 year plus affordability period with incentives for longer affordability periods.

SLLS strongly recommends that OCD work with SLLS and other partners to create a Tenancy Addendum for properties that receive any financing under this Plan. The Tenancy Addendum should include certain tenant protections at minimum including:

- Mandatory acceptance of Section 8 Housing Choice Vouchers and other tenant-based subsidies;
- Good cause eviction protection;
- Prohibition on waiver of notice before eviction;
- Mandatory cure clauses in leases;

- Periodic inspections and oversight to ensure properties meet health, safety, and minimum property maintenance standards;
- Mandatory compliance with LHC's new criminal background screening requirements and review of tenant selection plans;
- Limitation on lookback period for eviction screening and prohibition on denials based on rent debt or evictions that occurred during the COVID emergency period.

**Comment on Proposed Flood Insurance Program:**

The proposed Flood Insurance Program would best fulfill the stated purpose of servicing the state's most vulnerable grantees by expanding the program's year-long coverage, maximum premium coverage, and funding overall.

First, we recommend expanding the maximum insurance coverage from \$2,000 by implementing a no maximum policy, as insurance premiums are projected to drastically increase due to FEMA's new flood insurance premium calculation system (Risk Rating 2.0). With FEMA's Risk Rating 2.0, flood insurance rates can increase up to 18% annually, but many residents will end up paying much more.<sup>1</sup> As a result of these slated spikes in flood insurance, a

<sup>1</sup> Lawsuit filed by Louisiana and 9 other states seeks halt to steep flood insurance rate increases, (June 1 2023). <https://www.foxnews.com/us/lawsuit-filed-louisiana-9-states-seeks-halt-steep-flood-insurance-rate-increases>.

few lawsuits<sup>2</sup> have been filed. Specifically, in April 2023, St. Charles Parish filed suit, alleging the average cost of flood insurance there will shift from \$815 to \$2,766 annually.<sup>3</sup> The Times-Picayune calculated an average increase in flood insurance premiums of 134% throughout Louisiana with some individuals being forced to pay a tenfold increase.<sup>4</sup> For example, under the new system, the projected average full-risk premium for a single-family home will increase from

\$766 to \$1,700.<sup>5</sup> Given these estimates, the proposed insurance premium coverage maximum of \$2,000 is inadequate. Removing the insurance premium coverage maximum will ensure relief for the most vulnerable grantees regardless of the outcome of these pending lawsuits.

Second, we recommend expanding the year-long Flood Insurance Program to a tiered 2- year long assistance program based on financial need to ensure grantees continued coverage and assist with financial independence. The proposed full coverage for the first year should remain intact. For the following year, we recommend paying 50% of the insurance premium. With the 2- tiered, 2-years long program, grantees would have time to adjust and prepare for full payment of the insurance premium moving forward.

Covering a grantee's flood insurance for one year will greatly alleviate financial stress for many but only in the short-term. Considering flood insurance may be a new expense for grantees and will likely be more expensive than it ever has been given Risk Rating 2.0, many grantees may need more time, assistance, or both to maintain flood insurance. Specifically, a grantee's financial hardship preventing the grantee from obtaining flood insurance initially is unlikely to change within one year coupled with the fact the projected implementation of Risk Rating 2.0 may increase flood insurance premiums up to 18% each year, makes it improbable a grantee would be able to afford to continue paying for the flood insurance on their own after the program ends. Expanding the program's year-long insurance premium coverage would help guarantee the success of the program's purpose and better assist the most vulnerable grantees.

Third, we recommend increasing funding for the flood insurance program to account for the slated increase in insurance premiums due to FEMA's Risk Rating 2.0 and, hopefully, secure implementation of our recommended 2-tiered, 2-years long program in place of the currently proposed one-year long program.

**Comment on Proposed Soft Second Mortgage Program:**

The Soft Second Mortgage Program is an excellent program that will provide opportunities to many survivors to switch from renting to owning thereby gaining equity and

<sup>2</sup> In June 2023, Louisiana local officials, including Attorney General Jeff Landry, came together with nine other states and filed a lawsuit against the federal government to prevent the slated increases in flood insurance. *See, Id.*

<sup>3</sup> *Id.*

<sup>4</sup> Louisiana, 9 other states sue US government over steep flood insurance rate increases, McGill (June 1, 2023) <https://apnews.com/article/flood- insurance-rate-increase-lawsuit-644dabf9e59bafa7622cf06be188616f>.

<sup>5</sup> Flood insurance to rise 122% on average in Louisiana, data shows, Smith (August 27, 2022) [https://www.nola.com/news/environment/flood- insurance-to-rise-122-on-average-in-louisiana-data-shows/article\\_913fefb2-2550-11ed-ae92-379bd2be28d4.html](https://www.nola.com/news/environment/flood- insurance-to-rise-122-on-average-in-louisiana-data-shows/article_913fefb2-2550-11ed-ae92-379bd2be28d4.html).



building wealth. The Office of Community development outlines the extent of the loss to affordable housing caused by the 2020-21 Storms throughout their report. For example, the Action plan reports that damages from the May 2021 floods and Hurricane Ida are estimated at over \$44,925,000 for approximately 1,595 public housing units.<sup>6</sup> Substantial damage occurred also to private rental properties further reducing the availability of affordable housing.

While Louisiana continues to rebuild its rental housing stock and infrastructure, the Soft Second Mortgage Program will allow some disaster survivors to take advantage of the housing stock for sale. The program is designed to provide first time low- and moderate-income home buyers the opportunity to purchase homes. As proposed, the program offers a maximum award of \$60,000 in loan assistance and a separate maximum award of \$5,000 that can be used for a down payment or closing costs.<sup>7</sup> However, a recent article reported “The median home value in Louisiana is \$218,008” and “if you are buying a house in Louisiana, your closing costs may range between \$4,000 to \$11,000.”<sup>8</sup> Under the current market conditions, increasing the \$5,000 maximum per unit for down payment and closing costs assistance would cover more of these projected costs and remove more barriers to homeownership. The program could accomplish this several ways. The program could increase this maximum across the board for all participants.

The program could also create a discretionary mechanism for increasing the maximum on a case- by- case basis. Additionally, increasing the overall program budget for the Soft Second Mortgage program would increase the number of participants and provide the funds necessary to raise the \$5,000 maximum assistance per unit for down payment and closing costs.

#### **Conclusion**

The additional \$831.5 million in funding presents an opportunity to advance whole community recovery while addressing systemic inequalities faced by disaster survivors. Thank you for considering our comments on The Action Plan Substantial Amendment No. 3. If any questions or concerns arise regarding this submission, please contact me at

#### **RESPONSE:**

OCD appreciates SLLS’s thoughtful analysis as well as its continuing partnership in serving those more vulnerable to the consequences of disasters. Certain of the recommendations are addressed at items that result from budgetary considerations and others addressed at items to be covered in policy or program documents (rather than at the action plan level). As programs are implemented, OCD will continue to review the impact of the programs and whether any limitations may be loosened or additional funding if available should be redirected to the programs. Regarding particular recommendations, OCD notes as follows:

#### Rapid Rehousing/PSH:

The eligibility for Rapid Rehousing is broader than eligibility for PSH; the program policies do allow for persons at threat of homelessness to participate, not just those actually homeless. Similarly, when a renter has been displaced as the result of the disaster, securing housing that does not qualify as replacement housing does not disqualify participation.

#### Affordable Housing: Affordability Periods:

The period set forth in the Action Plan and amendments are minimum periods; OCD and LHC can in the implementation of programs issue funding opportunities with greater time periods. Currently, through the funding opportunity notices the PRIME multifamily rental program (the largest of those programs) requires 35 years of affordability. Note that while the state does want to maximize the housing created through these programs, it must balance the economic limitations that the rent restrictions place on the housing providers as well. For instance, in RRDP longer periods would present challenges to the non-institutional providers which can ultimately impact the quality of the housing provided and whether the provider remains compliant. The various affordability period requirements similarly take into account the impact of long-term participation. An important feature of those programs is that the loans are to be repaid. The intended use of proceeds of the loan repayments is reinvestment in affordable housing to both retain existing housing and create new housing.

#### Tenant Protections:

OCD welcomes continued discussion with SLLS, LHC and other regarding measures to address initiatives that both provide tenant protections while not dissuading housing provider participation in the programs. A step that has already been taken by the state in the programs utilizing Low Income Housing Tax Credits is the introduction of scoring criteria in the state's Qualified Allocation Plan for voluntary eviction prevention processes.