

PUBLIC COMMENTS ON ORIGINAL LAURA, DELTA ACTION PLAN

PUBLIC COMMENT

Here is an article that shows two insurance companies went into receivership in November 2021. They went after Hurricane Ida claims, too. Unfortunately, this claim goes all the way back to Laura and Delta. <https://www.insurancejournal.com/news/southcentral/2021/11/15/642216.htm> Let me know if you need other information. I sent you a separate email about collaboration, too.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Our attorney wanted to get information on the insurance company so we can look into this matter. Please make sure affected homeowners from Cameron Parish complete our Restore Louisiana survey, which is the first step in the application process, so we can get them in the queue.

Who can I speak to regarding the loan reimbursement for 2016 flood damage to my local business. I wasn't able to wait for the SBA loan because we needed to open up quickly to see patients in need so I reached out to a local rural healthcare company named AHEC who lent my business \$35,000. I am a small business owner with 3 locations in the Baton Rouge and Livingston parish areas. I am a female business owner with my company being Linx Physical Therapy and Wellness Center. Any information you can provide on if there is any Loan reimbursement for the loss would help greatly. Thank you for your time and consideration.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The assistance period for the 2016 Floods has closed, and the program is no longer accepting applications for that disaster.

PUBLIC COMMENT

FEMA did not take into account the severe stress that multiple hurricanes put on citizens living in older homes in rural communities. That the domino effect of those hurricanes devastating winds and rain placed on those houses. The damage estimate awards that they arrived at per individual household could not possibly cover all the related damages to those homes. The nature of those damages seen and unseen placed the home owners at a gross disadvantage when it came time for them to describe and list all the repairs necessary due to the multiple hurricanes. It is a matter of how much those repairs cost and addressing those cost on a fixed income. In closing it must be understood that people with and people without flood insurance lives were devastated and the remedy to that devastation was not sufficient .

OCD RESPONSE Homeowners who suffered major damage to their homes, and who did not have flood insurance are encouraged to complete the Restore Louisiana Homeowner Assistance Program survey which is the first step in potentially qualifying for program assistance.

PUBLIC COMMENT

Thanks for putting on the public meetings in person and virtually. I appreciate the opportunity to ask a few questions and make comments during the virtual meeting this week.

Regarding the Housing programs in Restore LA, you asked me to send you the homeowner questions and comments on one specific family where this program is probably their last hope. As mentioned, as a disaster recovery non-profit organization helping many small businesses, non-profit organizations, their workers, and their families, I have many clients with housing problems in Southwest LA. The four disasters really impacted the region.

1) The one that stands out the most is a home that was nearly destroyed by Hurricane Laura and Delta. They are elderly in rural Calcasieu Parish, have had to fight the insurance company to get funds, put in a complaint to the Commissioner of Insurance, and then had to file a lawsuit to get any funds. Then, a few weeks before Mediation was scheduled in December 2021, the insurance company went into receivership (bankruptcy). The insurance company is State National Fire Insurance and the state took it over.

The family still has a destroyed home because there is over a \$100,000 gap in what insurance paid and what it will take to repair the home. They had to buy a camper to live in on the family farm.

Now with the restructure process and the insurance receivership, they are tied up again since December with no movement while the company is liquidating and the state is taking over the process, etc. We understand that these cases usually pay the homeowner claim only pennies on the dollar. This is terrible for this family. We were hoping that the Restore LA program might be able to assist. The DCMP has not been helpful and has mostly been a waste of time. We can provide many more details if needed. Yes, FEMA does have this home classified as eligible for this program.

2) Another one that I mentioned by Zoom is in Cameron Parish where the double wide mobile home is gone. The homeowner did not get much money from insurance and can not afford to purchase a home. They are having to live with their adult children. As a commercial fisherman, he also lost his fishing boat and did not have insurance. He is having to do some construction and yard work to pay bills.

Thanks for allowing me to add these public comments for these two homeowners. Please try to help the homeowners who have had the insurance companies go bankrupt leaving them with nowhere to turn. I am glad to provide many more housing cases based on my clients concerns.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The first property referenced could still be an eligible candidate for the Restore Louisiana 2020 program, but any and all proceeds received by the applicant from their insurance carrier(s) would be considered duplication of benefits and would be included in the Restore Louisiana 2020 grant award calculation. The second property mentioned could also be an eligible applicant. The caps for MHUs depend on whether it's a singlewide (\$85,000) or doublewide (\$120,000) and any and all insurance proceeds would be considered duplication of benefits and would be included in the Restore Louisiana 2020 grant award calculation.

PUBLIC COMMENT

i need someone to please contact me back a help me get on waiting list for hud housing emergency homelessness housing assistance programs and get a voucher and home for my kids to get return in my custody in short time period please help me im a single mom who pays child support minimum wage and pays daily living necessities needed most the time need help with line up me with fastest help on applying urgently easiest way please thanks also

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. While the Restore Louisiana Homeowner Assistance Program offers temporary housing to active applicants whose homes are being repaired or reconstructed through the program, there is no additional housing assistance offered outside of that. We recommend contacting the Louisiana Housing Corporation at <https://www.lhc.la.gov>.

PUBLIC COMMENT

To Whom It May Concern:

I have many concerns and comments about the proposed plan, but I will limit this email to the ones I find most problematic.

- 1) Construction standards: I applaud the green and energy standards mentioned, but I want to make sure the construction standards include Fortified Building standards,
- 2) Grantee determination: Using FEMA database to determine grant recipients is problematic because many disaster survivors did not receive a correct determination from FEMA (I have professional evidence of this) because the claims were made during the COVID pandemic and many homes were not inspected in person by FEMA. In the meeting I attended it was said that survivors could file a FEMA appeal, but there are 2 problems with this. First, FEMA is telling survivors that the appeal deadline had passed, so they may not file an appeal; and secondly, appeals are taking up to 6 months on average to be processed, so a survivor will not be able to access the funds in a timely fashion. I would suggest using the state Disaster Case Management Program database as an additional source, as they are dealing with some of the most problematic cases, which include folks who have not received adequate FEMA assistance or received none at all.
- 3) Grantee determination: Additionally, the expanded rules for determining who is eligible for FEMA assistance are only in place for Hurricane Ida survivors forward, so many people who live in heirship homes were denied FEMA assistance for Laura and Delta. Given that these people would be eligible for FEMA assistance under the new rules, keeping them from getting these funds is inequitable.
- 4) In the Lake Charles area there are a lot of smaller nonprofits and churches doing a large portion of the rebuilding that has been done to date. Will they be eligible to receive funding to continue their work on the homes that did not qualify under FEMA?
- 5) And will small, local nonprofits be able to receive the hazard mitigation funding to help their existing clients?

6) The homeless were not eligible for FEMA funds, as they did not have conventional homes. But they suffered great losses also, in the form of losing tents, sleeping bags, camping equipment. Additionally, they had to leave behind tools they used for work (hand tools, lawn mowers) and their transportation (bicycles) when they were bussed to safe shelter. They did not receive any assistance to replace these items and are experiencing severe hardships as a result. Will any funds be put towards helping these, the most vulnerable among us? Again, this is an equity issue.\

7) And finally, once repair and/or mitigation work has been done on a person's home, they must maintain flood insurance to be eligible for future assistance in a disaster. In the information I read it looks as if they can get assistance with the first year of insurance coverage, which is good. But if they could have afforded it they would have had it, so after the first year of flood insurance they will not be able to afford it - still - and will be ineligible for assistance if their home is damaged again. This is an equity issue.

Thank you for your consideration of these points.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

1) FORTIFIED standards are being researched to be applied to the rehabilitation/construction completed by the state's contractors (Solution 1) and are being considered to be offered to those who choose to manage their own project (Solution 2).

2) Any issues with eligibility, appeals, or grant amounts through FEMA will have to be resolved with FEMA.

3) If FEMA determines an applicant to be an heir instead of an owner, the program can still possibly work with the applicant if the proper ownership and occupancy documentation is provided and approved.

4) If homeowners contracted with a church or non-profits for the repair/reconstruction of a home, there's the possibility that the repair or reconstruction could be funded through the Restore Louisiana 2020 program. If the work and materials were donated to the applicant, that would be considered a duplication of benefits and would be included in the Restore Louisiana Homeowner Assistance Program grant award calculation.

5) The Restore Louisiana Homeowner Assistance Program is designed to provide assistance to individual homeowners, rather than non-profit organizations. Historically, there have been occasions where the non-profit contracted with a Solution 2 applicant and the payment was then made by the program to the applicant and/or the non-profit directly.

6) The Restore Louisiana Homeowner Assistance Program is designed specifically for homeowners who have been affected by specific natural disasters. Programs providing assistance for homeless communities may be offered by another agency.

7) HUD requires that owners of properties in a Special Flood Hazard Area - that have received federal funds for repair or reconstruction - maintain flood coverage on the property in perpetuity. This is not

a negotiable condition. Applicants who are eligible to participate in the Flood Insurance Assistance program are provided high-level budgetary counseling in order to prepare for paying the premium after the first year is concluded.

PUBLIC COMMENT

Before you can get this program moving one way or the other more Storms are on the way as a precursor. Hardship on top hardship for the most vulnerable. Does anyone dispute that? Oh and covid is still lurking it does not consider politics.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Additionally, thank you for your patience and commitment to recovery in Louisiana. These proposed programs, upon HUD approval will be implemented with great urgency as the need is great for our citizens.

PUBLIC COMMENT

Please I would love to hear from you I don't know if you received the funds yet I would appreciate all the help you .the grant.. please let me know by email

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Your survey has been received. The Program will reach out to you as soon as the application period opens.

PUBLIC COMMENT

I'm not sure who to contact in regards to help or funding aide for the disasters of Louisiana 2019-present. Unfortunately during Hurricane Delta & Hurricane Laura I was homeless and very ill in which I am just able to seek medical attention. I have been diagnosed with rare spinal disease, agent orange disease (inherited from father), 2 mesh operations for vaginal area(have detached and since this has happened I am unable to be checked thoroughly by Dr Oliver my obgyn, because of obstruction and severe bacteria kidney & ecoli infections) been prescribed numerous antibiotics but infections keep coming back, scoliosis so severe my bottom half and top half are twisting in opposite directions causing so much pain and anxiety (diagnosed with PTSD, anxiety and depression), mass on liver-referred to liver specialist, mass in right breast-referred to specialist. In may 2018 I was terminated from my SSIA benefits. I was never given heads up about this decision and because of that I then lost my apartment, car, personal belongings and was raped. I blamed this on state and federal government. Still no one is able to give me answers plus they lost my medical records for 5 years, conveniently and then they reappear. I'm being represented by Acadiana Legal aide (Gena Registry), we have appealed twice and currently I'm living in section 8 housing no income and no transportation. I am unable to work because of my condition. Please advise or recommend any and/or all programs that could help assist me during this difficult time.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. A survey has been

submitted for your property, however, your FEMA ID was not found. Please contact FEMA at <https://www.disasterassistance.gov/> or 1-800-621-3362.

PUBLIC COMMENT

On behalf of Smart Home America, we are pleased to submit our public comments in response to the release of the Proposed Master Action Plan. Our comments are included in the attached PDF document. Please contact us if there are any questions or clarifications needed.

I am writing to provide comments in response to the Office of Community Development's Proposed Master Action Plan for the Utilization of CDBG-DR funds. We encourage you to take advantage of your continued opportunity to strengthen all construction projects using CDBG Funds by using a higher degree of wind resilience and incorporating the FORTIFIED construction program into the Proposed Action Plan and its accompanying Construction Standards.

Specifically, we recommend including FORTIFIED as a required resilient construction standard in the Action Plans released by your Office.

We suggest the following sample text for inclusion:

To mitigate the risk of high winds destroying existing, newly built, or rebuilt structures, all rehabilitation, reconstruction, or new construction must—at a minimum and in addition to specific siting and elevation requirements—meet the IBHS FORTIFIED technical standard and receive the FORTIFIED designation most relevant to the category of building. New construction must meet the FORTIFIED Gold level, and reconstruction and rehabilitation projects must meet at least the FORTIFIED Roof level.

This critical change will:

- Strengthen the resilience of Louisiana families and communities to hurricanes and other high-wind events; and
- Bring the Proposed Action Plan into compliance with HUD's new requirement that grantees must include mitigation measures in construction standards.

FORTIFIED Can Help Louisiana Meet New HUD Requirements

FORTIFIED can help Louisiana meet new legal requirements the Department of Housing and Urban Development (HUD) instituted in its February 3, 2022, Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice (Consolidated Notice). For the first time, grantees must include mitigation measures for all construction projects using CDBG funds.

When determining which mitigation measures to incorporate, it is our understanding that grantees should design and construct structures to withstand existing and future climate impacts expected to occur over the project's service life. To better respond to the wind risks facing Louisiana's building stock and meet the new requirements of the HUD Consolidated Notice, the Office of Community Development should strongly consider including FORTIFIED as an additional required resilient construction standard the Action Plan. Our proposed text is included on the first page of this letter.

The High Cost of Wind – And a Path Forward

High winds – especially the winds associated with hurricanes – have been among the most dangerous and costly natural hazards affecting families and communities of Louisiana since long before Hurricane Katrina. As highlighted on page 84 of the Proposed Action Plan, Louisiana's State Hazard Mitigation Plan's projection of future annual losses in 2043 identifies wind damage as the costliest future risk to the state, with a projected average annual loss of nearly \$643 million. Hurricane Ida demonstrated the high cost of hurricanes, with the Louisiana Department of Insurance reporting \$10.5 billion in insured losses alone, resulting from 434,633 claims.

Les Maisons de Bayou Lafourche and Success After IDA

Put simply, FORTIFIED works. In partnership with the Louisiana Housing Corporation, your office and the Louisiana Land Trust required that multifamily housing be built to the FORTIFIED standard in the PiggyBack Resilience Initiative Mixed-Income Project (PRIME) Notice of Funding Availability, which includes \$60 million of CDBG-DR funds.

Les Maisons de Bayou Lafourche is a success story from one of the hardest-hit areas during Hurricane Ida and identifies a path forward. The development – a \$10.9 million multifamily housing investment funded in part by previous allocations of CDBG funds from your office – provides 35 mixed-income housing units built to the IBHS's FORTIFIED Gold standard and include energy-efficiency features in Lockport, Louisiana. Nearly complete when the eye of the hurricane passed overhead, the structures withstood the storm. They suffered only cosmetic damage – a stark contrast to the devastation Ida's winds yielded in neighborhoods only half a mile away.

As a further measure of support for FORTIFIED in Louisiana, Insurance Commissioner Jim Donelon, Senate Insurance Committee Chairman Kirk Talbot, and House Insurance Committee Chairman Mike Huval recently introduced HB 612 to create a "Louisiana Fortify Home Program." The legislation would set up a grant program within the Louisiana Department of Insurance to incentivize Louisiana homeowners to retrofit their roofs to FORTIFIED.

Please feel free to contact me at julie@smarthomeamerica.org with any questions.

Sincerely,

Julie Shiyou-Woodard

President and CEO, Smart Home America

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. In our homeowner and affordable housing programs, the state is committed to implementing resilience standards. FORTIFIED standards are being researched to be applied to the rehabilitation/construction completed by the state's contractors (Solution 1) and are being considered to be offered to those who choose to manage their own project (Solution 2).

PUBLIC COMMENT

The Insurance Institute for Business & Home Safety (IBHS) is pleased to offer the following comments for your consideration in response to the Office of Community Development's Proposed Master Action Plan for the Utilization of Community Development Block Grant Funds (Proposed Action Plan). IBHS is a 501(c)(3) organization, enabled by the property insurance industry's investment, that conducts building safety research that leads to real-world solutions for home and business owners, helping to create more resilient communities. We are writing to encourage you to take advantage of a generational opportunity to strengthen all construction projects using CDBG funds with a higher degree of wind resilience by incorporating IBHS's FORTIFIED program into the Construction Standards set out in the Action Plan. Specifically, and as explained in more detail below, we recommend that you include FORTIFIED as an additional required construction standard in the Action Plan released by your Office. We suggest the following sample text for inclusion:

To mitigate the risk of high winds destroying newly built or rebuilt structures, all rehabilitation, reconstruction, or new construction will—at a minimum and in addition to specific siting and elevation requirements—must meet the IBHS FORTIFIED technical standard and receive the FORTIFIED designation most relevant to the category of building. New construction must meet the FORTIFIED Gold level and reconstruction and rehabilitation projects must meet at least the FORTIFIED Roof level.

This important change will:

- Strengthen the resilience of Louisiana families and communities to hurricanes and other high-wind events; and
- Bring the Proposed Action Plan into compliance with HUD’s new requirement that grantees must include mitigation measures in construction standards.

IBHS and the FORTIFIED Program

Severe weather disrupts lives, displaces families, and drives financial loss. IBHS delivers top-tier science and translates it into action so we can prevent avoidable suffering, strengthen homes and businesses, inform the insurance industry, and support thriving communities. The perils we study at IBHS are part of the natural world in which we live, but social and economic disasters occur when these perils meet human populations that live or work in harm’s way. In order to break the cycle of destruction, it is essential to address all aspects of the building performance chain: where you build, how you design and construct, and how well you maintain and repair. As a building science institute, IBHS focuses on the ways that weather behaves, what makes homes and businesses vulnerable, and how our buildings can be more resilient. We exist to help ensure that the places where people live, learn, work, worship, and gather are safe, stable, and as strong as the best science can equip them to be.

A critical way that IBHS translates our science into action is through the FORTIFIED program, a building standard and verification program IBHS developed to provide design and construction specifications for home- and business-owners who wish to improve their resilience beyond the mandatory levels outlined in state and local building codes. IBHS designed FORTIFIED to strengthen homes and commercial buildings against specific types of severe weather such as high winds, hail, hurricanes and even tornados. It is available for single family homes (FORTIFIED Home), commercial structures (FORTIFIED Commercial), and multifamily buildings (FORTIFIED Multifamily).

The High Cost of Wind – And a Path Forward

High winds – especially the winds associated with hurricanes – have been among the most dangerous and costly natural hazards affecting families and communities of Louisiana since long before Hurricane Katrina made landfall in 2005. This trend is expected to continue and worsen. As highlighted on page 84 of the Proposed Action Plan, Louisiana’s State Hazard Mitigation Plan’s projection of future annual losses in 2043 identifies wind damage as the costliest future risk to the state, with a projected average annual loss of nearly \$643 million. Last year, Hurricane Ida demonstrated the high cost of hurricanes, with the Louisiana Department of Insurance reporting \$10.5 billion in insured losses alone, resulting from 434,633 claims.

Yet, a success story from one of hardest hit areas from Hurricane Ida can also identify a path forward. *Les Maisons de Bayou Lafourche* project – a \$10.9 million multifamily housing project funded in part by previous allocations of CDBG funds from your office – provides 35 mixed income housing units built to the IBHS’s FORTIFIED Gold standard and also including energy-efficiency features in Lockport, Louisiana. Near completion when the eye of the hurricane passed overhead, the project withstood the storm and suffered only cosmetic damage – a stark contrast to the devastation Ida’s winds yielded in nearby neighborhoods.

Put simply, FORTIFIED works. This is why your office, in partnership with the Louisiana Housing Corporation, required that multifamily housing be built to the FORTIFIED standard in the Piggy Back Resilience Initiative Mixed Income Project (PRIME) Notice of Funding Availability, which includes \$60 million of CDBG-DR funds. As a further measure of support for FORTIFIED by Louisiana policyholders, Insurance Commissioner Jim Donelon, Senate Insurance Committee Chairman Kirk Talbot, and House Insurance Committee Chairman Mike Huval recently introduced HB 612 to create a “Louisiana Fortify Home Program.” The legislation would set up a grant program within the Louisiana Department of Insurance to incentivize Louisiana homeowners to retrofit their roofs to FORTIFIED.

FORTIFIED Can Help Louisiana Meet New HUD Requirements

In addition, FORTIFIED can help Louisiana meet new legal requirements the U.S. Department of Housing and Urban Development (HUD) instituted in its February 3, 2022, *Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice* (Consolidated Notice). For the first time, grantees must include mitigation measures for all construction projects using CDBG funds: Grantees must incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds as part of activities eligible under 42 U.S.C. 5305(a) (including activities authorized by waiver and alternative requirement). To meet this alternative requirement, **grantees must demonstrate that they have incorporated mitigation measures into CDBG-DR activities as a construction standard to create communities that are more resilient to the impacts of recurring natural disasters and the impacts of climate change.** When determining which mitigation measures to incorporate, grantees should design and construct structures to withstand existing and future climate impacts expected to occur over the service life of the project. Consolidated Notice, II.A.2.b (emphasis added).

HUD also requires grantees to identify resilience performance metrics:

Before carrying out CDBG-DR funded activities to construct, reconstruct, or rehabilitate residential or non-residential structures, the grantee must establish resilience performance metrics for the activity, including: (1) An estimate of the projected risk to the completed activity from natural hazards, including those hazards that are influenced by climate change (e.g., high winds destroying newly built homes), (2) identification of the mitigation measures that will address the projected risks (e.g., using building materials that are able to withstand high winds), and (3) an assessment of the benefit of the grantee's measures through verifiable data (e.g., 10 newly built homes will withstand high winds up to 100 mph). Consolidated Notice, II.A.2.c.

While the Proposed Action Plan includes construction standards (see pages 76-77), these standards concern green building – not mitigation measures. To better respond to the wind risks facing Louisiana's building stock, and to meet the new requirements of the HUD Consolidated Notice, the Office of Community Development should strongly consider including FORTIFIED as an additional required construction standard in the Action Plan. Our proposed text is included on page one of this letter. IBHS welcomes the opportunity to engage further with the Office of Community Development to discuss how our building science research could be applied toward the Action Plan and the Office's investment in the resilience of Louisiana. Please contact Michael Newman, IBHS Senior Director of Law and Public Policy, at mnewman@ibhs.org with follow-up questions.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD will incorporate as appropriate resilience and mitigation measures into its housing program guidelines as it has in prior programs. FORTIFIED building methods will be included as feasible and to the extent that the program budget can cover such additional costs.

PUBLIC COMMENT

money should be allowed for people that had insurance because people was a victim of contract Fraud please consider thank you

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your

comment and our response when we submit the plan to HUD for federal approval. Potential applicants who receive insurance proceeds are not automatically ineligible for the program, though it should be noted that any insurance funds received for repair of the structure would be counted as a duplication of benefits and would be included in the Restore Louisiana Homeowner Assistance Program grant award calculation. Additionally, contractor fraud is taken into account by the program if the necessary documentation is provided. For more information on contractor fraud, see <https://restore.la.gov/faqs>.

PUBLIC COMMENT

Thank you for your efforts to put forth a comprehensive Action Plan for the existing \$600M in CDBG-DR funds allocated to the state of Louisiana. It's obvious that this is nowhere near enough funding to meet the incredible needs in Southwest Louisiana, let alone throughout the state. Given that, prioritization and efficient use of the existing funds will be paramount. With that in mind, the Louisiana Fair Housing Action Center (LaFHAC) provides the following comments:

1) We commend your office for ensuring a proportional amount of housing relief is targeted at renters, who are often left with less support after disasters.

2) We're also grateful for the nuanced priorities and phasing contemplated for the Restore Louisiana Homeowner Program (RLHP). These priorities will ensure that the families most impacted are not left behind as those with the most resources jump the front of the line.

3) In contrast to the very nuanced and thoughtful income targeting in the RLHP, LaFHAC remains concerned about the lack of income targeting in many of the other housing programs, especially the rental programs. a. Of the three primary rental programs—the Middle Market Loan Program, the Neighborhood Landlord Rental Program, and the Resilient and Mixed Income Gap Funding Program (PRIME)—only the Middle Market Loan program includes income requirements for tenants, setting them at 80% AMI. This is particularly problematic, given that data consistently shows that the need for affordable rental housing is specifically at 50% AMI and below. Since 2007, the National Low Income Housing Coalition (NLIHC) has calculated the availability of rental housing affordable to different income groups. Their *The Gap* report always shows that there is a sufficient amount of affordable units available at 80% AMI in Louisiana, but there has never been a sufficient amount of affordable units available at 50% or 30% AMI.¹ To truly meet the unmet need, every rental program in this action plan should ensure the units produced are available for people at 50% AMI and below. b. The Soft Second Mortgage Program also does not include income targets for its recipients. Unlike affordable rental housing, income targets for homeownership programs should be set higher than 80% AMI to ensure a robust pool of applicants who can qualify for a loan. We recommend setting the target at 100% AMI.

4) LaFHAC is also concerned about the short terms of affordability in most rental programs. In the two programs for multi-family housing, the affordability term is only 20 years, compared to a minimum of 30 years for Low Income Housing Tax Credits (LIHTC) awarded through the Louisiana Housing Corporation (LHC). LaFHAC has argued that even 30 years is too short, as many states are moving to 40 or more years of affordability for new LIHTC developments. To ensure these funds are used efficiently, it is imperative that the state set the terms of affordability for at least 30 years. This is also relevant to ensure the Neighborhood Landlord Rental Program doesn't fall victim to the same problems as the Small Rental

Repair Program after Hurricane Katrina. The program does not make clear any affordability terms for buildings with four units and below and allows for affordability terms as short as five years for buildings with more than four units. Allowing units to become market rate so shortly after a public investment is a waste of taxpayer funds. We recommend affordability terms with a minimum of 10 years that increase to 30 years for new construction. We also urge the state to share its plans for ongoing compliance monitoring, as New Orleans advocates regularly saw Small Rental Repair grantees flouting the terms of their agreements and renting substandard properties at market rate prices.

1 *The Gap: A Shortage of Affordable Rental Homes*, National Low Income Housing Coalition, 2019, Available: <https://reports.nlihc.org/gap/2019/la>.

5) Louisiana has a longstanding problem of not addressing equity on the front end of its disaster recovery programs and watching as they reentrench segregation and violate the Fair Housing Act's mandate to Affirmatively Further Fair Housing. In one particularly noteworthy

example, New Orleans became even more segregated after ten years of housing recovery programs than it was before Hurricane Katrina.² The state's targeting metrics for the RLHP should help address this with regard to homeownership, however, there must be a complimentary commitment to ensuring new rental housing does not perpetuate segregation. This is especially concerning given the often racially coded Not In My Back Yard (NIMBY) opposition we've seen to LIHTC and other affordable developments across the state in recent years. LaFHAC has tracked instances of local officials delaying, denying, or imposing moratoriums to thwart affordable housing developments in Hammond, Denham Springs, Gretna, New Orleans, and St. Bernard Parish, among others.³ It would be a tremendous waste of funds to award millions in affordable housing funding and then see developments delayed or killed by local governing authorities years later after the urgency of rebuilding has subsided. To ensure these developments are actually built, we urge the state to tie the acceptance of CDBG-DR infrastructure funds to the acceptance of affordable rental housing and to use Notice of Funding Availability (NOFA) scoring to prioritize low poverty areas for these developments.

2 Seicshnaydre, S., Collins, R., Hill, C., and Ciardullo, M. *Rigging the Real Estate Market: Segregation, Inequality, and Disaster Risk*. The Data Center. 2018. Available: www.datacenterresearch.org/reports_analysis/rigging-the-real-estate-market-segregation-inequality-and-disaster-risk/.

3 Raley Pellitteri, "Attorney warns city officials to stop interfering" Hammond Daily Star, September 1, 2020, available: www.hammondstar.com/news/attorney-warns-city-officials-to-stop-interfering/article_62e1962f-046d-559f-9056-6f17ecb62cf0.html; Paul Cobler, "Denham Springs Council blocks proposed location to rebuild flooded public housing" The Advocate, December 8, 2020, available: www.theadvocate.com/baton_rouge/article_dcf07b0c-399d-11eb-a2a4-3f9dec3ca4c.html; LaFHAC Calls on the City of Gretna to Immediately Lift its Ban on Multi-Family Housing Development, LaFHAC, November 23, 2020, available: <https://lafairhousing.org/nimby-neighbors-fight-senior-housing-in-central-city/>; GNOFHAC Issues Letter Exposing Unlawful Racial Animus in Opposition to Mixed-Income Development in the Bywater, LaFHAC, 2019, available: <https://lafairhousing.org/gnofhac-issues-letter-exposing-unlawful-racial-animus-in-opposition-to-mixed-income-development-in-t/>; St. Bernard Parish to Pay \$1.8 Million to Settle Decade Long Fair Housing Center Suit, LaFHAC, December 19, 2014, available: <https://lafairhousing.org/st-bernard-parish-to-pay-1-8-million-to-settle-decade-long-fair-housing-center-suit/>.

6) LaFHAC also recommends increasing the funding available to immediately address homelessness. It will take years for many of the new affordable units financed through this package to actually be built and leased up. In the meantime, the number of families experiencing homelessness has increased dramatically. According to the service provider in the Lafayette area, there are 27 children enrolled in school that are currently living in tents and cars in just Lafayette Parish alone. This spike began during COVID, but has been exacerbated by the fact that the Acadiana region has been a receiving community for many families displaced by Hurricanes Laura and Delta.

7) Finally, LaFHAC urges the state to ensure all new rental units are subject to the LHC's tenant selection policy regarding criminal background screening, as well as the lease addendum regarding no cause evictions. Again, because these funds fall desperately short of the full need, we must ensure the units they produce are open to all and do not allow for unnecessary displacement.

Thank you for your consideration of these issues. LaFHAC is happy to answer any questions or provide any additional follow-up information.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The majority of proposed rental programs are administered by LHC, therefore, they followed specific guidelines set forth by LHC. All housing programs outside of the Restore Louisiana Homeowner Program are 100% budgeted to meet HUD's low to moderate national objective.

PUBLIC COMMENTS PUBLIC HEARING 4.12.22

PUBLIC COMMENT

"Thanks my 11 year son and I are excited about a new home. I had recently repaired our home a few months before the storm."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please be sure to submit a survey for Restore Louisiana Homeowner Assistance Program, which can be found at restore.la.gov or by calling 866.735.2001.

PUBLIC COMMENT

"This is not a question but I hear Calcasieu Parish. Please do not forget the residents of Cameron Parish specifically the north central portion. The Grand Lake community where the majority of the parish population resides."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Cameron Parish is included in the list of Most Impacted and Distressed areas for the program, as determined by HUD.

PUBLIC COMMENT

We are finding that new policies will likely be more than and may be significantly more than \$2K while it might have been \$1700 before RR 2.0.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program will be offering flood insurance assistance to qualifying applicants that will take care of the premium for the first year of coverage. Applicants who participate in the program are given high-level budgetary counseling in order to prepare for paying the premium once the year has concluded. Additional information regarding FEMA NFIP 2.0 can be found on their website <https://www.fema.gov/flood-insurance/risk-rating>.

PUBLIC COMMENT

"How do we get access to this presentation the recording and the slides? Thank you"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes we will send out the presentation tomorrow and a version of it can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Can we get the slides presentation

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes, we will send out the presentation tomorrow and a version of it can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Calcasieu Parish has more than 59% damages due to Hurricane Laura and Hurricane Delta. Most probably around 78%. HUD assistance will be better utilized by helping people rebuild their houses. That should be the main focus of this program.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. By our estimates we have budgeted adequately to repair/rebuild the home of every eligible homeowner.

PUBLIC COMMENT

Does the Flood Insurance Program assume that the homes are in low risk areas or assume freeboard to take advantage of freeboard discounts? Is it limited to houses in the OCD repair or reconstruction programs or any houses damaged and repaired?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Flood Insurance Assistance Program is limited to LMI households in the Restore Louisiana Homeowner Assistance Program where flood insurance is required by federal statute. Applicants should inquire about freeboard discounts with their insurance provider. The Restore Louisiana Homeowner Assistance Program requires BFE/ABFE +2' or the jurisdiction requirement, whichever is greater, for all reconstructions. The program requirement was communicated to all parish officials and permitting offices in the fall of 2021. Additional information regarding FEMA NFIP 2.0 can be found at their website <https://www.fema.gov/flood-insurance/risk-rating>.

PUBLIC COMMENT

With the implementation of Risk Rating 2.0 and the potential for flood insurance rates to significantly increase is there any anticipation that additional funding will be appropriated for the flood insurance programs? This is assuming that people who currently have coverage (and have the option to) decide to drop their policy.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Flood Insurance Assistance Program is a supplemental program designed to assist eligible LMI homeowners actively participating in the Restore Louisiana Homeowner Assistance Program who are required to provide proof of flood insurance prior to receiving grant funds. Currently \$500,000 is the proposed budget for the Hurricanes Laura and Delta allocation.

PUBLIC COMMENT

Is the HMGP Global Match going to be limited to LMI individuals or a block grant to the Parish?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We plan to select specific projects that primarily benefit LMI households and fund those projects with CDBG funding. This will cover the match of all Hazard Mitigation Grant Program (HMGP) projects.

PUBLIC COMMENT

What is the Area Median Income for SWLA

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For Calcasieu and Cameron parishes 50% AMI is \$22650 for one person; \$25900 for two people; \$29150 for three people; and \$32350 for four people. 80% AMI is \$36250 for one person; \$41400 for two people; \$46600 for three people and \$51750 for four people.

PUBLIC COMMENT

Will the Restore Homeowners Program continue to be a reimbursement program for 2020/21 storms and if so will the outreach people as yourself explain that homeowners will have to pay upfront for all repairs and wait for reimbursement.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For Solution 1, no funds will be required from the homeowner other than funds previously provided for the purpose of rebuilding or reconstruction, e.g. FEMA home repair funds insurance etc. For Solution 2, the program pays for completed construction progress with up to 5 progress payments. It is important for homeowners participating in Solution 2 to have a project plan and draw schedule that facilitates cash flow for their project. Reimbursement, or Solution 3 funds, will be available for work that was completed prior to the program damage assessment. Reimbursement funds can be determined once a program damage assessment is complete and then funds are paid immediately after grant execution.

PUBLIC COMMENT

Thanks so much for all of this information! When will the process start for rebuilding? I've had my home demolished as requested by the city.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The current anticipated launch for the Restore Louisiana Homeowner Assistance Program is summer 2022.

PUBLIC COMMENT

"I heard that there are applications open at the state in anticipation of proposed programs. Is that true? If the State is not taking applications at this time will it have the capacity to accept and use data gathered by the Parish to jumpstart the program intake process? If so can the State share the draft criteria that are required for each program to avoid sending clearly ineligible applicants?"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The survey is currently open for all federally declared disasters of 2020 and 2021. The basic eligibility criteria for the Restore Louisiana Homeowner Assistance Program can be found at restore.la.gov. The anticipated launch date for the Restore Louisiana programs is summer 2022.

PUBLIC COMMENT

Will RFPs be published for each Program (seperately)?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We have already posted an RFP for the construction management services. We expect to also procure program management services, as well as others

PUBLIC COMMENT

How long do you anticipate time table from Phase 1 to get to Phase 6?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. It depends on how many homeowners complete the survey, and how quickly. It could be as short as a couple of months but could be longer.

PUBLIC COMMENT

Is the COVID funding on the same timeline as the other funds?

OCD RESPONSE NO COVID funding is through the US Treasury and not a part of this Action Plan or this allocation of funding to Louisiana. For more information on COVID funding and programs please visit www.lacovidhousing.com

PUBLIC COMMENT

Does this mean that if the Fed designates more funds that the public comment period keeps getting pushed back?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We do not anticipate additional funds for Hurricanes Laura and Delta, but regardless we do not expect to restart the public comment period for this Action Plan. If additional funds were to become available, we would likely do an Action Plan Amendment to incorporate those funds.

PUBLIC COMMENT

Can you please show the slide that shows eligibility for this program or the info? Also do you have to have all the requirements to be eligible for this program? Thanks

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If additional funds were to become available, we would likely do an Action Plan Amendment to incorporate those funds. Eligibility criteria and the slideshow for this presentation can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Looking back at the slides are you saying that if we received more than \$25k in insurance proceeds that we will not be eligible for HMGP? We can not replace our house for Rebuild.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Homeowners who received more than \$25,000 from insurance proceeds may have the ability to participate in the Restore Louisiana Homeowner Assistance Program which is a separate program than HMGP. In the event of eligibility, remember that all funds received by FEMA, SBA, insurance, etc. for repair of the structure would be counted as duplication of benefits and would be included in the grant award calculation.

PUBLIC COMMENT

Will the program be available to folks who were underpaid by their insurance companies? I received a check from insurance that only covered 25% of my expenses. I've already completed my repairs. Would that 75% I spent out of pocket be something I could pursue through the program?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the amount you received from insurance was the policy maximum and you still have unmet needs to complete repairs, the additional repairs could be eligible for the Restore Louisiana Homeowner Assistance Program. Please refer to the current program guidelines for reimbursement criteria at <https://restore.la.gov/>.

PUBLIC COMMENT

Can we use the funds to purchase new mobile homes?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Mobile home replacement is generally eligible for homeowners who qualify for the Restore Louisiana Homeowner Assistance Program, but subject to specific program guidelines. Please refer to current program guidelines at <https://restore.la.gov/>.

PUBLIC COMMENT

Does this program include Repairs/Replacement of Mobile homes

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Mobile Homes are eligible structure types for the Restore Louisiana Homeowner Assistance Program. Please refer to current program guidelines at <https://restore.la.gov/>, for more information regarding repair and replacement parameters.

PUBLIC COMMENT

If you cannot live in your mobile home. Can you tear the mobile home down or should you wait until someone from your program comes out to do an assessment? FEMA can assist me with temporary rental assistance.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Be sure you reach out to your local jurisdiction before demolishing your home. Please refer to current program guidelines at <https://restore.la.gov/>.

PUBLIC COMMENT

Thank you Judi. Cameron parish is certainly identified as a Most-Impacted and Distressed area by both the state and HUD. This means impacted residents may be eligible for assistance and are encouraged to complete the survey here: <https://restore.la.gov/> (Note: FEMA registration number will be needed to complete the survey)

PUBLIC COMMENT

How will developers be notified of funding availability in each sector?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We will advertise through a Notice of Funds Availability when the rental programs start up. These notifications will come from OCD and the Louisiana Housing Corporation, and we also plan to promote through press outlets and reach out through other less formal channels as well to reach as many eligible recipients as possible. Please monitor the program website, restore.la.gov, for program updates.

PUBLIC COMMENT

Thank you. I am registered and have completed survey. Our home was destroyed and we are older than 62. A 30 yr mtg is not an option. The \$884 per month FEMA rent is going to be difficult. We are middle income but now that inflation is 8.5 percent our income does not go as far with utilities groceries and fuel cost rising. Will AMI be recalculated based on cost of living?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. AMI is not

specifically calculated based on the cost of living. Please be sure to work with your FEMA Advisor to submit the hardship documentation to potentially reduce the amount of monthly rent. You can also reach out to the Disaster Case Management program as well at dcmpla.com.

PUBLIC COMMENT

When I originally applied for the HMGP I was told that we could not begin any part of the rebuild process. We had insurance but under insured. Now costs have doubled. FEMA is now requiring us to pay a high monthly rent.

OCD RESPONSE Please be sure to work with your FEMA Advisor to submit the hardship documentation to potentially reduce the amount of monthly rent. You can also reach out to the Disaster Case Management program as well at dcmpla.com.

PUBLIC COMMENT

Does HUD require a 2 foot freeboard for all substantially damaged homes repaired or reconstructed?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes, HUD requires a minimum of 2-feet above Base Flood Elevation (BFE) for substantially damaged/improved or reconstructed structures. The current draft program guidelines can be viewed at restore.la.gov website.

PUBLIC COMMENT 4.12.22

I had major damage total loss was approved for a SBA loan but it really did not cover all my costs for a new home. I also have a disabled child and will need to build a ramp and porch once my home gets here. We put down payment on a manufactured home March 2021 and tentatively will be delivered mid may. Would I be eligible for help to finish getting my new home set up? I was in an old mobile home with no homeowners available to me due to age."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Your survey has been received, you will be notified by the program when the application period opens. Solution 3 (reimbursement) funds are available for mobile home replacements up to \$85,000 for a single-wide mobile home unit. 504 Disability accommodations must be requested during the application process, and if awarded, will be in addition to the \$85,000 funding cap. Please be sure to read the guidelines carefully regarding MHU reimbursements and to ensure that you meet the elevation requirements of the program or your parish, whichever is greater. All funds received from FEMA, SBA, insurance, etc. would be considered a duplication of benefits and would be included in the grant award calculation.

PUBLIC COMMENT

I had work done on my home thru the SBP. To make my home sound enough to live in repairs was limited. I still have rooms that need repair such as gut and replacing walls. I did not have insurance at time of the hurricane will I be eligible for additional help

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. You are encouraged to complete the Restore Louisiana Homeowner Assistance Program survey at restore.la.gov. Also you are encouraged to reach out for further assistance to the Disaster Case Management program at dcmpla.com

PUBLIC COMMENT

Who is the Disaster Case Manager service provider where people who are in need can outreach?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The application information for the Disaster Case Management program for individuals impacted by Hurricanes Laura/Delta can be found at dcmpla.com.

PUBLIC COMMENT

I'm currently working on my home but my funds are running out. And I won't be able to finish to make it liveable. My floors has soft spots and some places has holes. I just need some help on the things I can't do"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The City of Lake Charles just announced the launch of a local repair program for residents within the city limits. More information can be found here: <https://lchrrp.com/>.

THE FOLLOWING COMMENT CARDS WERE SUBMITTED AT THE APRIL 7 PUBLIC HEARING

- ~~Not~~ - NOT just assist with Flood insurance
lots of homeowners can't afford regular,
homeowners insurance. Folks on SSI,
disability. Most damaged homes (are) NOT restored
due to NO T.N.S. Coverage at All.
- Also once your group help with Flood insurance
for a year - Who will educate them on how
to manage their finances to continue
with coverage for life time.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Qualifying applicants who participate in the Restore Louisiana Homeowner Assistance Program are eligible for flood insurance assistance that will take care of one year of flood insurance coverage. The recipients of this grant are given high-level budgetary counseling in order to prepare for paying for the premium when the policy has concluded. Flood insurance is required by HUD for properties in a Special Flood Hazard Area that have received previous federal funds for repair.

COMMENTS

under Infrastructure & Economic Revitalization or Public Services

Will there be any funds available for Health care organization like SWLA center for Health services? most of the patients we serve are low income, uninsured, or on Medicaid. We are still waiting on FEMA but we know there will be a non-federal share our organization will be responsible for. Could we apply for the Match program. Our health care organization has been a safety net for the uninsured and under insured for over 45 years and employ about 100 employees just in Lake Charles. We need funding assistance to continue providing services in a safe environment.

 RESTORE
LOUISIANA

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state has committed funds to offset the burden of the non-federal share match requirements faced by local entities and jurisdictions. The Non-Federal Match Program policy document will be posted on the Restore website, restore.la.gov, once the program is launched.

is that I lived in my grand-parents home when it was destroyed by the hurricanes. Right now I'm living with a friend. I need help in trying to get the property clean off or to rebuild. I have run out of options, the city sent a letter telling me they would clean it if I would pay for it through my property taxes. The house is destroyed what do you suggest. If you have any solutions give me a call at 337-532-0642 I am 65 yrs old and don't have the funds. Thank you.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For information regarding ownership criteria, please reference the Restore Louisiana Homeowner Assistance Program policy guidelines on our website at restore.la.gov and pay special attention Page 75 (Individual-level Eligibility).

COMMENTS



We need more Affordable housing for ppl like me, I'm on disability + can't find a nice place of reasonable in price. More apartment complexes that go by my income are needed.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Action Plan includes affordable housing, new and repairs, as this is one of the primary activities for which CDBG DR funds may be used.

COMMENTS



IS there a way to prioritize moderate income families who are required by a court order to live in a certain area so they can find affordable housing?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Surveys submitted to the Restore Louisiana Homeowner Assistance Program are prioritized by income, disability and age. Please see current program guidelines at restore.la.gov.

When you say low to moderate income what is that range.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Low to Moderate Income (LMI) is up to 80% of the Median Income of a given area. So, if you make up to 80% of your area median income, you would be considered as LMI. Income limits by parish are determined by HUD and can be found at https://www.huduser.gov/portal/datasets/il/il2021/select_Geography.odn.

COMMENTS



**RESTORE
LOUISIANA**

Home ownership proof (i.e. good title)
should be relaxed for those who
title can not be corrected pragmatically

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Properties that have been seized or adjudicated are reviewed on a case by case basis. Regardless, the program cannot provide funding for a home that is no longer owned by the applicant. Additionally, no grant award funds are available for clearing the title of a home. Please see page 75 of the Restore Louisiana Homeowner Assistance Program policy guidelines at restore.la.gov.

COMMENTS



It is a fact that homeownership vs renting strengthens communities. I would like to see more focus ~~on~~ on ownership. The supplemental funds to rebuild rental homes gives a timeframe of 30 years. A home can be paid off in 30 years building wealth and strong communities. Most often a mortgage payment will be less than rent here in Lake Charles. I've commented before but I am still very concerned about funds being allocated to North Lake Charles. There must be transparency

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD strives for transparency and accountability in all of its programs. OCD supports home ownership and has provided funding in its Action Plan to support programs to encourage home ownership, such as, soft second programs.

- Representing Kingsley's Building Solutions [Derrick Edwards - owner]
- local Community Builder
- Focus Area is Affordable housing primarily in Gossport, car shop,
- Built + Renodeled + 80 homes since the storm
- Building Affordable housing is our current model. We are well respected in the low income area as well as investment builders
- Question: How do we work together with the project to help rebuild our communities? We have a wealth of knowledge in building affordable homes and we request a formal meeting to discuss the plan of action in detail
- We are Adequately to Support "Solution 1 or Solution 2"
- * Would it be possible to be a Community Advisor RESTORE.LA.GOV on the Board to Support the local Community?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD has advertised for its Solution 1 contractors and the procurement process is underway. The requirements for Solution 2 contractors performing work under Restore 2020 can be found within the program's policies and procedures which are available on-line at <https://restore.la.gov/>.

COMMENTS



These events cause an increase in adjudicated properties and keep them out of commerce. These properties for the most part are outside of flood zones, in low to moderate income areas, and have infrastructure (electricity, sewer, water, streets, etc.). Could HUD through Restore Louisiana implement a program to assist with quieting titles to spur redevelopment or put together a fund to insure title risk so financing to build and redevelop becomes a viable option to encourage economically feasible infill development. The biggest obstacle to adjudicated properties is not necessarily clearing the title as much as having title insurance to allow for redevelopment.

The municipalities can allocate adjudicated properties to community development corporations (CDC) to engage developers. If a developer does not have to bear infrastructure costs or even land acquisition costs and basically build housing with materials and labor costs. Their margins should be met and housing should be priced affordable rates. The infill in qualified no flood zones in low to moderate income communities with quality affordable homes built to new storm standards will result in more resilient communities - a win win situation. I would like consideration given to ~~a~~ fund and claim mechanism to offer the benefits of title protection and investment encouragement for housing. } program to develop and implement a

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. All CDBG funds must have a tie-back to the disaster funding source. There are programs in the housing section of the Action Plan that allow options for funding new affordable housing developments.

COMMENTS



Please consider funding to set-up satellite sites throughout Calcasieu Parish for residents to come and get assistance in applying for these programs. Sites such as churches & non-profits with funding for training volunteers, expanding wifi services, printing/copying etc. This parish has a huge population of under educated citizens, but also has large networks of faith based groups and non-profits.

Thank You

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold outreach events in the Most Impacted and Distressed (MID) parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions.

- How can we assure that the information properly reaches the hands of an elderly population?
 - Is there an opportunity for those who missed the initial sign up?
 - If we can be of assistance, please let us know.
 - Can someone provide this information to our seniors at our facilities.
- Thank You!

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold Outreach events in the MID parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions now.

- Will the funding assist with future housing initiative that the council has planned? (Section 202 grant proposals)
- Thank You!

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold outreach events in the Most Impacted and Distressed (MID) parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions.

The Action Plan does address programs that will increase rental property availability. These programs are administered by the Louisiana Housing Corporation and Notices of Funding Opportunity will be

advertised by that agency.

Will there be funds for investors that are purchasing properties restoring them for rent or purchase

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Action Plan does address programs that will increase rental property availability. These programs are administered by the Louisiana Housing Corporation and Notices of Funding Opportunity will be advertised by that agency.

FEMA

See Attachments - Public Comment
on Program Management RFP ~~Criteria~~ Criteria Change

COMMENTS



What about individuals who were denied rental assistance by FEMA; how do these individuals restore and recover from the extra monies used above their monthly allocated budget for rent. I spent \$15,190.00 above my monthly normal rent budget for an apartment for 14 months. I have depleted my savings. Why can't the renter have some funds to help recover preparing for upcoming storm season funds in savings low. RESTORE.LA.GOV -over-

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program offers housing assistance to active grantees who are otherwise unable to find temporary lodgings while their home is being repaired/reconstructed. Reimbursement for interim housing is not offered by the program. For this, please contact the Louisiana Housing Corporation at <https://www.lhc.la.gov>. It may be possible they can assist with your current rental expenses.

PUBLIC COMMENTS LAURA, DELTA REVISED ACTION PLAN (Set two)

PUBLIC COMMENT

Below you will find Imperial Calcasieu HSA, Developmental Disabilities Division, comments for the Action Plan Recovery from Hurricanes Laura and Delta.

It is greatly appreciated for the efforts put in place by the State of Louisiana and OCD to help out the most affected areas of the state from Laura and Delta. As you most certainly know many of the people we serve and those entities that provide the care to the most vulnerable are still struggling as a result of those devastating storms. Many of us would not have predicted or imagined the impact that continues to affect us here in SWLA.

One overarching comment we have throughout the document relates to those receiving assistance. While it does mention that allocations are prioritized to the most vulnerable populations, and individuals with disabilities are within that group, it doesn't not define "individuals with disabilities" in the Action Plan. As you are well aware, that is a very broad term. By no means are we saying certain people with disabilities need to be excluded; however, we are asking that when it comes to the prioritization you consider those that are at high risk of institutionalization be put at the very top of the priority list. Many of those we serve within our Medicaid Waivers are at risk for institutionalization without the necessary supports to keep them healthy and safe. We have Medicaid Waiver recipients that went into nursing homes or moved out of state as a result of the storms and currently still can't return to the community because of lost housing and our providers don't have staff to serve them.

With the distribution of funds and unmet needs, we think it would be helpful if provider agencies could access some of these funds for building repair, housing, recruitment and retention of staff which provide care to our vulnerable population. We had situations where providers lost buildings they used for their programs and lost staff during the evacuation and recovery stage. Providers still are unable to recruit staff due to people's inability to return to our area for lack of housing.

We agree with the Activation of the RSFs, especially RSF 3 which includes LDH and recommend continued State and Parish/Local community collaborations to ensure distribution of funds provide the most helpful benefits to their community.

With regards to the Interim Housing Assistance Program, are there any restrictions as to where Temporary housing assistance funds can be utilized?

Funding is established for areas directly impacted by the disaster.

With the Neighborhood Landlord Rental Program, what will the oversight be to ensure that once applicants receive funding/loans to redevelop "affordable rental housing" that the rent does in fact remain reasonable and affordable for LMI tenants?

The Landlords are required to provide annually,

- For existing tenants - a lease rollover that provides the rollover rent amount, initial rent amount, and the rollover period. Also a lease addendum

New tenants – New lease, lease addendum, income sources, and documentation.

What is the main difference between PSHP and the Rapid Rehousing Programs and eligibility for these?

RRH provides rental assistance to household the meets the program eligibility for short –medium term, maximum assistance is 24 months. Usually established for a specific cause, such as 2016 flood or other disaster.

The PSH program is designed to assist household that have at least one member that is disabled and in need of Medicaid services to live in the community. The program provides long term rental subsidy to the household.

Lastly, when the Action Plan is implemented, we recommend that there be assigned person(s) designated to work with those within our DD population to help them navigate all of programs to ensure that can take advantage of what is being offered. If you do not do this, we believe many will go without, fall in the cracks, and continue to be underserved.

OCD Comment: Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **In regard to interim housing, this program offers assistance for active (grant executed) participants in the Restore Louisiana Homeowner Assistance Program that meet program criteria and require temporary housing during the construction phase of their program repair or reconstruction project.**

PUBLIC COMMENT

Housing LOUISIANA is a statewide initiative aimed at meeting Louisiana's housing needs and creating a statewide network of regional housing alliances to ensure better collaboration across the state. The partnership works to preserve and provide affordable housing for people across the state, with a focus on the needs of the most vulnerable members of society, such as seniors, people with disabilities, veterans, low-wage workers, and low-income families.

HousingLOUISIANA's objectives are quite similar to those of the Office of Community Development. As federal resources for affordable housing grow increasingly limited, we realize the significance of making the greatest use of those resources and leveraging funding to achieve better results.

As the Office of Community Development plans to release the 2022 Restore Louisiana Action Plan, we have the following recommendations/concerns:

Extend the Engagement Process:

For the 2022 RestoreLA Action Plan, the OCD's engagement process should be extended. The most recent timeline was released at a public meeting in Lake Charles. However, May 1st is a Sunday, and many members of the community have other obligations, and some of our most vulnerable populations, such as the disabled and the elderly, lack the capacity or computer literacy to participate. There should be a training session on how to submit comments and attend meetings for our senior participants. The time limit is 30 days, according to the Restore Louisiana Action Plan. This does not provide enough time for partners to express their reservations about the strategy. Extending the comment period to 90 days would allow readers to thoroughly review the toolkit and make their suggestions. Irregular, short-notice funding announcements result in lower-quality applications, inefficiencies, longer development timelines, and missed possibilities for resource leveraging. Knowing the timeline ahead of time will help HousingLOUISIANA members and developers around the state plan their projects. The agency's outreach program needs improvement, particularly in its arrangement manner for meetings.

Several meetings have taken place, and partners, specifically in Lake Charles and Alexandria were not notified about any of them. Case in point, locals across the state were uninformed of a recent Restore Louisiana Action Plan meeting until the day of. Participants were then requested to submit their comments online by scanning a QR code instead. This is unacceptable. Partners and the public alike, need to be informed in advance to be able to fully participate. We also strongly recommend LHC's use of the HUD CDBG Toolkit, which could provide much needed guidance on financing eligibility, however, the agency isn't providing residents with this information either.

Laura/Delta Impacted Housing:

According to Laura/Delta Impacted Housing, we recommend providing a timeline for allocations. Three million dollars is insufficient. The monies are being distributed incorrectly. Emergencies necessitate emergency finance. The trailer distribution process should be streamlined, and the program should be expanded. We've seen that there are more renters than homeowners that are affected, which is unusual, and we recognize that your data comes from FEMA. We agree the Restore Louisiana Homeowner Program is beneficial to homeowners in need of financial assistance, however the planned \$3 million to be distributed among more than ten communities is insufficient. We suggested that the price be reduced to \$6 million. This could reimburse eligible expenditures for storm-damaged home repair, replacement, or elevation that some people had to pay out of pocket since FEMA never assessed their homes. We can't afford to ignore our most vulnerable citizens. Please propose an area of criteria for senior citizens, LGBTQ people, people who have been formally incarcerated, mental health survivors, single mothers, and opportunity youth. There should also be money set aside in the Homeowner Assistance Program for families who did not have insurance when the storms hit.

Tribal Communities

The government should invest in long-term and emergency housing that can endure the harsh conditions they face. People cannot work if they are not at home. We are aware that the funds are being sent through numerous departments. We request that Governor John Bel Edwards and local governments collaborate with the Louisiana Office of Community Development and other departments. More infrastructure dollars are needed for tribal communities. If the sums included in the 2022 Action Plan is intended to be used to create infrastructure, they are insufficient. To protect the community from storms and enhance drainage, levees, barrier islands, and wetlands must be built. We suggest that you use Infrastructure funds for wrap around services

Elevation

The handling of applications requires communication and administrative assistance. FEMA required community members to provide property tax to prove they owned the property, according to residents. Because of this, many people were turned down at Lafitte. FEMA claims that exceptions will be made, but they are not. People have also been turned down because other people have filed claims against their property or their Social Security number has been stolen. Following Lily, which had previously been elevated for Rita, Ponte Au Chein raised some residences. Members of the community believe that a procedure for obtaining funds for elevation should be established. Families claim it took a long time and cost \$99,500 to raise their home after Katrina and Rita in 2005. It wasn't until 2011 that they began elevating the house, which was six years later.

Emergency Permanent Affordable Housing

When a natural disaster strikes, there should be a designated revenue source for emergency housing. Chief Shirell Dardar of the of the Grand Caillou/Dulac Band of Biloxi-Chitimacha- Choctaw says that in April, the average rent for 121 units with over 1700 households were \$1107 per month. There are just 121 units available. There is a pressing demand for new, deeply inexpensive homes. Look towards Florida if you want to see a good plan. They help people who are directly involved in the community and who are undertaking this work. The requirement for a

license has been removed in Florida. They must sign an agreement demonstrating that they are familiar with the codes and the inspection.

FEMA Accountability

The bureaucratic red tape is one of the most difficult aspects of going home to communities and planning to build up permanent housing. Particularly from government agencies at the local and state levels. It's been difficult for some, who have been told that yes, if they intend to elevate their homes above the floodplain according to FEMA guidelines and choose to do so before the federal government's funds are distributed (for lack of a better word), they may do so with the possibility of being reimbursed. Some have been warned that they will need to obtain a special waiver or permit in order to have permanent residence on their property. It would be essential to obtain a special permission or authorization of some sort - a "exception" – that would allow them to extend the period before elevating if the money were available. This is a problem, and we ask that you start holding FEMA accountable for leaving hundreds of thousands of individuals unable to pay for their damaged houses. Despite the fact that HUD believes FEMA is giving cash, people were in locations where FEMA had not declared a natural disaster. If you want to encourage people to keep in touch with FEMA, simply remind them to do their jobs and use the HUD Toolkit. The Department of Housing and Urban Development (HUD) requires reliable data. What happens if FEMA refuses to provide declaration information?

We are pleased that the OCD has been active in this process to date, but moving forward in order to help the plan be successful, there is opportunity to leverage this partnership to make sure we are providing affordable housing and services needs for the residents of Louisiana.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

Engagement: During the action plan public comment period, OCD hosted five public meetings in impacted areas working with local partners and two virtual meetings. After HUD approves the action plan and OCD has access to the federal funding, we intend to conduct a comprehensive outreach campaign to promote disaster assistance resources available through various programs.

Laura/Delta Impacted Housing: If FEMA did not assess the home, please contact FEMA at 1-800-621-3362. The Restore Louisiana Homeowner Assistance Program will provide funds for elevation to eligible, participating homeowners. Phasing in the Restore Louisiana Homeowner Assistance Program has been designed to prioritize the most vulnerable citizens who did not have insurance. Please refer to Restore Louisiana 2020 guidelines at [Restore.La.Gov](https://www.restorela.gov).

Elevation: The Restore Louisiana Homeowner Assistance Program will provide funds for elevation to eligible participating homeowners. Refer to the Restore Louisiana 2020 policy at [Restore.LA.Gov](https://www.restorela.gov). Anyone who has been turned down by FEMA should contact FEMA with supporting ownership documentation. In regards to SSN being illegally used for federal relief, contact FEMA Fraud at 1-866-720-5721.

FEMA Accountability: On September 27, 2021, OCD mailed a communication out to parish officials and permitting offices to notify them that the Restore Louisiana Homeowner Assistance Program elevation requirement will be ABFE+2' or jurisdiction requirement, whichever is greater.

PUBLIC COMMENT

Our housing is in need for these resources in the Sulphur Housing Authority for damages from Hurricane Laura.

Sulphur Housing Authority

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Calcasieu Parish has been designated as a Most Impacted and Distressed (MID) area for this program, and funds will be available for this area.

PUBLIC COMMENT 4.25.22

We definitely have a need for these resources in the Vinton, LA area due to impact from Hurricane Laura.

Vinton Housing Authority

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Calcasieu Parish has been designated as a Most Impacted and Distressed (MID) area for this program, and funds will be available for this area.

PUBLIC COMMENT

Thank you for identifying the need for safe, decent, and affordable housing as the state's top priority in the draft action plan. With the devastation Louisianians have faced, including Louisianians who rent their homes, ensuring all are safely and stably housed is the most important goal. I write today to offer comments intended to help achieve that goal quickly and equitably.

My Enterprise colleagues and I remain appreciative of The State of Louisiana Office of Community Development's focus on ensuring properties are built to withstand future weather events, so that residents are protected from foreseeable harm. We are grateful for the state's selection of Green Communities Criteria as a way of meeting applicable federal requirements and ask that you retain this when finalizing the plan.

The draft action plan could be strengthened by the state explicitly availing itself of new flexibility from HUD and Congress to use CDBG-DR funds to pay off post-event, short-term loans used for affordable housing. Using this flexibility, the state can test whether short-term, private sector capital loaned for multifamily affordable housing can be a critical tool for shortening the time to get Louisianians home faster.

Specifically, we request that Louisiana offer funding to private non-profit, for-profit and public developers and landlords to repay private-sector bridge loans made for multifamily housing construction and related activities begun after the incident date of the covered disaster. The funding should be available for applicants who took out a short-term, private loans for affordable housing in the most impacted and distressed areas. We recommend dedicating up to \$25 million for this pilot (less than 6% of the \$423 million proposed for multifamily affordable housing).

In order to ensure good public policy, we suggest that the state provide funding only for bridge loans offered at reasonable rates. The state should work with developers or owners selected via a competitive process run by a state entity (such as LHC or OCD/DRU) or selected by a locality through a similar method. Enterprise Community Loan Fund, our affiliated community development finance institution, is prepared to offer affordable housing loans in the most impacted and distressed areas for properties serving individuals and families averaging no more than 60% of AMI. We look forward to working with you to make Louisiana's disaster recovery program better able to meet the needs of impacted residents.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Action Plan as presented contemplates the ability to include these types of loans as part of the Restore Louisiana Homeowner Assistance Program activity

PUBLIC COMMENT

I have attached two documents of public comments from over a dozen residents of two Plaquemines Parish communities, West Point a la Hache and Ironton, which are both historic Black towns that experienced devastating flooding in Hurricane Ida.

Please add them to the comment record on your 2020-2021 State Action plan to spend federal disaster funding.

CASE MANAGEMENT We need funds to get ourselves back together. We need funds to get together for purchasing our homes. We need help from everywhere. It's been 7 months, it's too long and nothing is getting done. Nothing is happening at all.

During Katrina we lost everything, it's like a repeat. But we got more help after Katrina than what we are getting from Ida. It's like no one wants to help out, we have to do this on our own. I think it's ridiculous. It's not fair. We're just sitting and waiting and nothing is being done.

The money should be spent on helping the people who need help, especially those who have lost everything. I think that our officials – at the state level, federal level with FEMA – they need to get off their butt and start doing their jobs. We need to get things going so people can come home and get their lives back together, and go on with their everyday living. I'm tired of going to meeting after meeting and nothing is being done. There's talk but no action.

Money should be spent on helping people to purchase new homes that were damaged in Ida, as well as elevation. Whatever they need.

I want to stay in my community because that's where I was born. I've been there for all my life. Why would I want to move? Why would they want us to move? To places that are dangerous? We want to live in communities where they are safe. How would you like it if someone forced you to move? Into a community where there is crime? We don't have any crime going on in Ironton, the community where I'm from. I'm not going anywhere.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations and there will be a separate Action Plan for Hurricane Ida.

FEMA I'm an army veteran, I've been living in Ironton for 68 years now. I heard that on the state level that the state had received several billion dollars for recovery. And they have a \$3 billion surplus. Some of that needs to be used to help us restore our community. Some of the state level – Senator Bill Cassidy

came down to our community and said our community needs to be restored. Since he came down, no other people from the state level came down to see our community to investigate and say the community needs to be built back up. I got more help after Katrina came. I did get an SBA loan to purchase a new home and now I'm living in a travel trailer.

Every day I wake up and look around my community I see the same thing. Nothing is being done. The parish is not helping us, everyone in the community is getting together, cleaning their own property up to make our community look like something. The baseball park needs to get cleaned up. If you clean your face then the body gonna look good. But some of the money that the state has needs to be spent in Ironton and other places – West Point a la Hache – just as well as Ironton. I hope our comments to our Louisiana REstore and state officials make a difference – I hope they hear our comments and help our community get back up off the ground.

For me to get a travel trailer – it took a while. You got to get a permit, you got to talk to FEMA, I was talking to FEMA almost every day and it took me two or three weeks before I got through to FEMA to let them know I needed something to stay in, and I eventually got a state trailer.. Sometimes I slept in my truck and it was really hard, waking up in the morning. Now I do have a roof over my head through the Ida sheltering program and it's not much but I have somewhere to stay. One day, One day at a time, I hope our community can come back together. Everyone can have their houses built up and elevated and that our community- - the member who can come back– our community can come back as one. Our town was one of the only ones impacted by Hurricane Ida and I pray every day that our community can come back one day and look like Ironton was.

If we had better levees our community would never have flooded. How long is it going to take before we have better levees? Before something like this happens again? I don't know who I have to talk to or who I have to talk to to see about getting the levee built but this needs to be a priority for the parish, the core of engineers and the state government.

Why wasn't Plaquemines Parish added on to the list of the different parishes that was affected by Hurricane Ida? I had to speak with someone to let them know that our community was affected by Hurricane Ida. That's how I came about getting my state travel trailer, after giving them the information and letting them know that my home was destroyed. It took me a while and I do have somewhere to stay. My property has been cleaned up but I need a house. A home to stay in.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD and there will be a separate Action Plan for Hurricane Ida.

FEMA There's red tape. One of the biggest challenges with returning home to our communities and preparing to set up permanent housing is the bureaucratic red tape. Particularly from the local and state government bodies. It's been challenging some have been told that yes, if they intend to elevate their homes above the floodplain according to FEMA guidelines, and they choose that before the funds from the federal government are distributed (for lack of a better word) that they may elevate their own

homes with a possible chance of being reimbursed. Some have been told that in order to have permanent housing on their property it would be necessary to get a special waiver or permit of some kind – an “exception” – that would allow them an extension of time before they can elevate providing the funds are available.

Promises are made but they are not always kept. Ultimately nature will decide for everybody and we want to do what we can to change nature’s mind, change the government’s mind, and make them realize that Ironton (my community) is worth saving. Because it’s rich in history.

Families have invested in the community, the church is the focal point and the cemeteries always keep the community remembering what was. Right now we are missing a lot because a lot of us still aren’t home, and haven’t been able to find a way to get there, for many different reasons. We no longer hear the sounds of laughter, of children playing in the neighborhoods because there is nowhere to play.

We no longer see the camaraderie between the men in the community because they are too busy trying to care for their families and do what they need to get back home. We pride ourselves on being strong but we’re tired. We’re tired of being denied, we’re tired of being afraid, and we’re tired of loss. We want to get back, not what we had before, but better than what we had. And that means better levee protection, sustainable housing, stronger infrastructure, and the freedom to live the way we were meant to, in a community such as ours. Is that too much to ask for?

It took four years to get my home elevated after Isaak. A lot of labor, and a lot of paper. The process of restoration needs to be made simple and expeditious. That’s a challenge. I think also, one of the other challenges, to help our community and every individual – I’ve always been told that knowledge is power. I think a lot of people outside of Ironton have looked down on us – not just Ironton but other African American communities. We have been stigmatized in a way, in that people outside of our communities, look down on us because they perceive us as lacking knowledge. But they also withhold information from us.

It’s all about how the information is disbursed after disasters. After Isaak, the information came directly to the library where I work. Unfortunately, a lot of people in my community do not patronize the library. I was expected to deliver all the documentation to everybody in my

community because I work at the library. That’s not my job. That is the job of our officials, our parish councilman. Lack of information was a major obstacle.

To get our home elevated, we had to meet a criteria according to information provided about base elevation. It was required that you have flood insurance to begin with. There were stipulations to consider before even applying. I’ve never done so much paperwork in my life, not even for taxes ...

During that time, when it came to the insurance, people always had difficulty with the nature of filing their claims/ If they had both homeowners and flood insurance, homeowners insurance was always wrestling with flood insurance to see who was obligated to pay what according to the policies. Which caused delays. Lack of legitimate contractors was always a challenge too.

It was strange how the local government was working during the time of hurricane Isaak. Trucks were hauling mud out of the parish. There was an uptick in the borrow pits throughout the parish. When they were digging out the dirt in those pits, lots of times that dirt was being hauled outside of the parish. It could have been used to continue the work of creating and fortifying levees in the areas that needed the levee protection most. Now the parish looks like swiss cheese. Our levees are leaking today! The parish and state allowed these permits for the borrow pits and there was no enforcement that companies backfill those pits after use, after the dirt had been dug out. Now we have these open pits filled with bodies of water which become a health hazard and a safety hazard over time.

Right now, my neighbors are also wringing their hands over the cost of flood insurance, as we expect a substantial rate increase. I'm a little nervous because I'm due to renew my flood insurance in June, so I'm checking my mailbox everyday for my notice. It makes me antsy. Now Louisiana is getting billions through FEMA for recovery, and we could get more funds through the Infrastructure bill for hazard and flood risk mitigation like levees. Yet I'm still expected to have flood insurance when that money comes in. And I'm willing to bet that when that money comes in to Plaquemines Parish it will be diverted.

My personal opinion is that our local government does not do well handling FEMA funds. If any money comes directly to Plaquemines Parish, it's always going to be spent on the parish council's focal point, which is Belle Chasse.

There is no moratorium, that I know of at least, that is controlling the development of residential subdivisions in the Belle Chasse area. How does the parish expect to support that development if there is no immediate infrastructure in place, in terms of flood protection, drainage and sewage?

I think one of the issues of why it's a struggle for families with young children to return is because of the lack of internet service. We live in a digital world now and a lot of school age children depend on the world wide web to help with their education. It has been a struggle because certain internet service providers aren't even giving us a second look. We can't get service from AT&T down in Ironton, they refuse to do anything right now. There is service available but it's not quality. I can't stream movies after 8pm without service breaking down.

The policy decisions our leaders make show that they want to Coastal Master Plan says this plain as day. They want to move the entire Southern population of Plaquemines Parish to provide space for industry and business to come in and do what they do. In Plaquemines Parish, anything below the flood gate will become an industrial corridor, there will practically be no more seafood industry, the wildlife will disappear and there's – after the port is completed – there will be river traffic like you'd never believe. There won't be green space below the flood gate. Up to that point I think a lot of communities will begin to die out and of course those are the African American communities. Where else are we supposed to affordably live? That's the question. I can't afford a house in Belle Chasse. I can't afford a house in New Orleans. So how much further do I need to go to find where I can live and not go broke? Why can't I just stay where I am, where I know the land is mine? Just leave us alone.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment

and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations and there will be a separate Action Plan for Hurricane Ida.

FEMA I don't know what the problem is with FEMA but they seem like they don't want the people to come back to Ironton. From Ironton down, they it's like they don't recognize that we are there. It's like they think we don't matter because we don't have as many people, but they still need our votes. I also have a problem with FEMA – if they give you money they feel that you're stealing. After Katrina_ FEMA You can't give me a check that i didn't write – you gave me a check I didn't write and the check came from FEMA. So now I'm penalized because you gave me a check. I didn't steal that money, you gave me this money.

When I got home, FEMA didn't want to do everything. After Katrina, we lost everything. Everything I owned was in the street. When I did come back and try to get back home, FEMA didn't give me money from Katrina since 2009. That's five years after the storm. Where was I to live during all that time? The treat Black people like we are stealing. If the government gives us a check,

There were a lot of people who'd never travelled, never have money, they lived day to day. When they got FEMA money they used that in a way they felt was best for themselves and their families. FEMA is taking me through this now – they are penalizing me because of their beliefs, not because of my actions.

During Zeta, I stayed in my home. The roof went bad. I called FEMA and asked them to repair the roof. They refused. I'm on a fixed income. With my fixed income, I can't afford flood insurance. I was never under a penalty for my home because my home was passed down to me by my parents. FEMA expects that when my parents left, that it was my obligation to do certain things but during the period when I was working, the minimum wage was \$5.25. I did not have money to bring home.

FEMA treats me like I've stolen from them. They don't want to see our community come back. Evne at the parish level, they refuse to let people come back home because they want to industrialize our parish. They want to replace the community with oil and gas. But we grew up in the seafood industry. Most of our people hunt and fish, that's what we know. Shrimp boats. The Parish wants to industrialize everything. Before Ida, the parish wanted to put oil tanks next door to Ironton.

Alliance refinery shutdown from damage after Ida. But the parish still wants to replace our community with industry, because we are right there on the river. It's easy to load and unload, bring ships in. But this community belongs to our families. Our older people have worked hard for their families and this is their legacy. They didn't prepare wills, they told us how they were leaving their property through the generations. This is how our community has always operated. The house I was living in is almost 150 years old and was in good condition. It lasted through all of the hurricanes that came through until Katrina.

Zeta put trees down but we didn't know it was a serious hurricane. When Ida came, we had no idea that we had to leave and would come back to nothing. They never told people that a barge was on the levee

that pushed water out of the river onto our graves. A lot of people didn't know there was a barge up there. The water that came from the Gulf met with the water from the

Mississippi River and pulled all of the tombs out of our cemeteries. I had a body standing up in my front yard and it stayed there for a long time.

We fought for the parish to not leave the borrow pits open but they let them open. Now the mosquitos are so bad you can't even cut grass in the evening or the mosquitos will tear you up. It's a lot, it leads to diseases. When we were younger, trains would pass by carrying sulphur, and kids would get sores on their legs from the sulphur in the air — "engine fire." We had cistern water because Ironton was not given access to running water. My brother ended up with diphtheria. My mother had to stay in the hospital with my baby brother for six months. His tongue swole up, his brain and his heart swole up. Now he is disabled and I have to take care of him.

Recently after Ida, FEMA decided that they did not want to help me because they claimed that I stole a past check that was given after Katrina. They would not tell me why, they just said they couldn't help me. I didn't have flood insurance but I can't afford it on a fixed income. The most I get is \$1000 a month, there's no money there for flood insurance. I have to buy groceries, pay bills. FEMA refused to help me after Zeta and Ida. Ida destroyed everything I have, it moved the caskets over the ground. You go down to Ironton now and the caskets are still out of the ground. I have no idea why FEMA does not want to help me. I am 73 years old and there is no jobs I can get. I have an aneurism and health issues, I have no idea why FEMA is treating me the way that it is.

With the money htat the state has now, it should be spent on housing. Putting people back in their homes, raising houses. But also the levee system and the drainage. We need all of that done. Right now we have drainage issues and when it rains or floods water does not flow out of ironton. We are really in bad shape. I think the parish and the state and the federal government is prejudiced against us because we are Black. They don't want to do anything for us. I am angry with FEMA because I worked all my life, I pay taxes. And I feel that we vote, we pay taxes, we put people in office and they do nothing for us in this parish. Plaquemines PARish spends all of its money in Belle Chasse. FEMA will help people in Belle Chasse raise their houses where there is no need to elevate. They put a flood wall in Belle Chasse by the naval base but there is no water coming in. They put a flood wall in Wood Park, which is lower down than Ironton, but it's a white community. But they would not put one in Ironton.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations and there will be a separate Action Plan for Hurricane Ida.

HOUSING I'm ready to come back home. I am not sure why I haven't been able to come back home. I can't go nowhere else. There's no place like my home, in Ironton. I've been living in Ironton since I was born. I'm 76 years old. I've been out of Ironton since I came out of Charity Hospital. I love my home – if

no one else is going to love it, I'm going to love it. I love my community, I love the people in my community.

The state has money and it should be spent on housing. I need to buy a new double wide trailer, I need furniture to replace what was destroyed in Ida.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations and there will be a separate Action Plan for Hurricane Ida.

FEMA Usually FEMA gives us trailers after a storm, but they work so slow on that. This time we got trailers through the state, because FEMA refused to give us trailers because we were a "flood zone" but they bring trailers into Lafourche, Tangipahoa, Livingston Parish and even further down the road from Ironton. That may be due to the Parish president, he's the one stopping trailers coming in from Ironton.

The Parish isn't doing anything for us. They haven't finished cleaning up our community. After Katrina we didn't have to pay to tear our houses down. But now after Ida people had to pay out of pocket to get their own homes torn down. Ironton residents had to rent our own equipment and clear our streets ourselves. The Parish won't cut our grass, now you have to watch out for snakes because of high grass.

As far as the flooding, there are no repairs being made to our levees. In Myrtle Grove (white community further down from Ironton) there will always be a problem due to the canal, which acts like a funnel. Some people the water came from that Myrtle Grove canal. The levee breached from West Point a la Hache to all the way by Alliance Refinery. They almost act like they want to flood us out. I've seen holes in the levee, gashes where there are sand bags, running from West Point a la Hache all the way to the Alliance refinery.

Myrtle Grove chose to be on the water, they knew they would have flooding issues. They choose to move out by all of those canals. In Ironton we didn't choose to be exposed to these

flooding issues. In Myrtle Grove they give them flood insurance and paid out claims for items and property that was damaged at the bottom of their homes, but the flood insurance didn't pay out claims. Why is Myrtle Grove considered Belle Chasse for flood insurance purposes but Ironton is considered as part of Port Sulphur?

There's no back levee to protect us from the Gulf waters. After Isaak the Parish had the money to fix the levees but once the federal funds came down to Plaquemines Parish, they did what they wanted to do with that money.

As far as our drainage, there has been a little work done by the parish, but they need to have a suction truck come and suck out every drain in Ironton to clear them out. After a hard rain, the water will drain a

bit in some spots, but very slow. The Parish doesn't work efficiently to fix our drainage issues, they will come and say they are working on it, but they are not clearing out our drains.

I think the state needs to spend its FEMA funds on housing, restoring our land, and drainage. We need to build up the foundation of the land so what when water comes in it will drain down out of the community. With the housing needs, we need more temporary housing and we also need to build new housing that can withstand these storms.

I want to come back to Ironton because it's my community, it's a safe place. You don't have to worry about gun shots or crime. The worst thing you have to worry about is a snake or a wild hog. Down in Ironton the cost of living is lower than in New Orleans or Belle Chasse.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations and there will be a separate Action Plan for Hurricane Ida.

FEMA The state needs to spend its money on getting communities like Ironton back home. We need our houses lifted, they need to help us with that. I finally got a state trailer two weeks ago, I've been staying at my job since the days after Ida hit, in the pumping station, since August 29th. I was in the pumping station pumping that night. I had to report to the pumping station the night that Ida hit, we had no power, I had to get the generators and the air compressors running so we could start the pumps and run them around the clock. I worked through the storm, and with no housing I had to stay in the pumping station for months after the storm. My state trailer is just sitting on the ground, not even tied down, and Hurricane session is about to start in June.

I want to get back as soon as possible, get out of the state trailer. We finally got about six or seven state trailers in Ironton. The reason why it took so long to get the FEMA trailers in was because FEMA was saying they would have a trailer park where they would bring in state trailers, and so I was waiting on them. But then everything changed. First FEMA said they wouldn't bring in trailers because it's a flood zone area, then they said they would ring them in by Port Sulphur, then FEMA called and told me they cancelled the area that they would bring in trailers. But they never came through. I didn't hear back from FEMA, so I finally applied to get the state trailer. A superintendent at my job finally made a call for me and helped me get my state trailer quick. I got my trailer within seven days, and I got power hooked up. People asked me how I got it so quick, and they said it must be because I work for the Plaquemines Parish government.

Now, like everyone else in my community, I just want to get back

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FEMA FEMA and the Parish are requiring people to raise the houses up in Ironton, so we need money. They should give us support to make that happen. Plaquemines Parish is getting money from the state and federal government. They are supposed to fix the levee and some of the pumping stations. I've lived in Plaquemines Parish all my life, for 85 years. If we don't get help to elevate our homes, we are really going to be in a bind.

Right now, they've given me a little state trailer and I had to go buy a shed so I can hook up a washer and dryer. Right now we have to drive all the way up to Gretna just to find a place to wash our clothes.

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First thing we need to come back is a levee. We need levee protection. We have not had levee protection. The levees are the reason we keep flooding. Other communities get levee protection and without their levee they would have been flooded out years ago. But we do not get a levee for our part of Plaquemines Parish.

We also need funding for elevation because if we are not elevated we will keep flooding. We've been flooding since 1985, and it gets worse every time. If we had had the levees up, we would not have to have our guards up every time it's hurricane season. Your children lose things, so they don't want to come back home. It's a mental thing with the kids.

They've bypassed Ironton with the construction of levees. They bypass us because we are a little Black community. The federal levee stops at oakville, and Ironton has a river levee but we don't have a back levee. The back levee picks up past West Point a la Hache. And the Parish digs up borrow pits and takes the mud out to Ironton and runs it outside of our community. Because we are a little Black community we always get looked over for any and everything.

With getting our temporary trailers from the state, lots of people in Ironton were calling but they could not figure out the application process, and then the program closed. So a lot of people want to get back home but they can't because they don't have nowhere to live. I want to be back home, so now I'm living in a camper.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations. With previous notices, funding was restricted for any levee construction or improvements. However, the Restore Louisiana Homeowner Assistance Program will provide funds for elevation to eligible, participating homeowners. Please visit restore.la.gov to see the current guidelines for Hurricanes Laura and Delta recovery for available homeowner repair and reconstruction program, as we anticipate the Hurricane Ida guidelines will follow along the same lines.

MITIGATION First of all, the main issue is that the levees need to be addressed. No if, ands or buts about it. The number one priority must be the levees. They omitted Ironton when they initially built the back levees. I believe that was a discriminatory act because they were trying to support and enrich the white communities just south of Ironton. They were having legislators research the prospect of acquiring a floodgate over barataria bay to give the luxurious campsite of Myrtle Grove flood protection. Myrtle Grove is a campsite. Ironton is a community where people live full time and we are struggling to get protection to save our homes from flooding, they were more interested in giving protection to camps that were utilized periodically. For them to be able to have the capabilities to hold up the continuity of the New Orleans to Venice levee from protecting the community of Ironton, it just lets you know where we are in relation to who gets

service first and who is the biggest concern of our parish. Should it be the rich white individuals who just came here recently or the historic Black community that's been there for over 200 years? When Myrtle Grove became a community, Ironton had already existed for over 150 years.

Secondly, the funds should be spent on helping the community of Ironton to elevate their homes. It has been proven with the most recent storm that every home that was elevated in the community withstood the hurricane with minimal damage. It is a proven fact that elevation works. Had all the homes in Ironton been elevated prior to Hurricane Ida, I do believe that the devastation would have been minimal.

I think there is a concerted effort, at every agency at every level of our government. The objective is to run Black and brown people out of their historic communities. This is going on in Plaquemines Parish. Local government delays recovery to discourage you and make you feel like you just want to leave. Yet they do not assist you financially in order to leave. Leave to where? In order to go where? And not everyone wants to leave their home.

When I say that we are delayed, everything is getting delayed. From one part of government to the next. They delayed the FEMA trailers and the state trailers, it's always a constant fight and a struggle with the government. Some of these things should be automatic, when there is a need it must be addressed. The recovery of the community – the debris removal, the demolition of the homes took forever, it's always us being forced to beg for the right to recovery because we are a Black community. Compare the recovery from the devastation in Ironton after Ida compared to what happened after the tornado in Arabi.

It's like a slow drag. They drag everything along. To give you a perfect example: the location of our park in Ironton is the face of the community. Psychologically, our officials want us to feel at our worst, in the most depressed state we can be in, that too plays into driving us out of the community and making it so we do not want to return. Just two days ago the Parish government finally started cleaning up the park, seven months after Ida – that request was made by our government months ago and they are just getting to it today. That shows they are intentionally delaying everything. They used in house equipment for that clean up, they did not have to rent anything, they had the workers already. Why did it take them seven months?

I am scared of Plaquemines Parish getting FEMA funding. Because of the makeup of the council and the local government, chances are slim to none that it will reach the impacted communities – the communities that were sacrificed in Ida - which are minority communities. This is based on what Plaquemines Parish has done in the past when they've received federal funds. There is nothing to make me believe that things will be done differently this time, unless we all become watchdogs of the Plaquemines Parish government.

We have the right to come back home and rebuild. Most folks are very comfortable with living in the country setting, as opposed to a city. It's much safer, there's no crime. This is our home. We are a historic community. We know that we are walking on the same property and the same land as our ancestors. It is our right to live where we choose.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations. **With previous notices, funding was restricted for any levee construction or improvements.** However, the Restore Louisiana Homeowner Assistance Program will provide funds for elevation to eligible, participating homeowners. Please visit restore.la.gov to see the current guidelines for Hurricanes Laura and Delta recovery for available homeowner repair and reconstruction program, as we anticipate the Hurricane Ida guidelines will follow along the same lines.

MITIGATION I'm devastated. My future here in West Point a la Hache seems like it's coming to an end. Not because of my health but because of the government personnels who refuse to give us proper assistance and protection through these storms and the disasters that we've been through and have been going through. I vote for councilmen, I vote for parish presidents, I vote for other officials but it seems like they forget us. No one comes to stop by and see if they need anything.

No one seems to be doing right for me or my community. I've been fighting with the Army Corps of Engineers about the back levee (gulf side levee) that we need. No one seems to care about this section of the parish. We have a partial opening of our levee and an area of the levee that has been completed and a pumping station, but we're not served by that infrastructure. We don't have a proper levee or a pumping station in West Point a la Hache.

I've paid taxes on my property for the last 15 years and this is supposed to be my father's estate. I'm paying the taxes on my home and I would like to have more reliable support from my government so I can continue to pay taxes and live on my own property. It seems like this area here is vulnerable for the next storm coming, and that storm season is coming soon.

If our officials would stop by and talk with me and others in West Point a la Hache to explain what they are doing and why they are doing it, we would have more confidence in them as leaders who are reliable. I pay taxes. I need representation and support from my officials.

I need my home to be elevated. I need officials to come in and clear storm debris from my property that's been here since Ida. I have had to clean up debris from the storm myself, and I'm not being compensated. I have no resources anymore.

I was supposed to be reimbursed by FEMA for clearing debris, I have the receipts and they haven't given us anything.

They have to be more attentive to the people in West Point a la Hache. We were promised a levee system, they need to complete what they have said they would do yet they have neglected to do that. Where is the federal money going? Why are there no construction people at this area who left their work after Ida? The next storm is around the corner. I need help in order to survive and to continue living in West Point a la Hache.

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MITIGATION At this time it would be difficult to adjust to another way of living. I have been here all my life. I don't want to live anywhere else. I'm comfortable where I am. The state government is getting money, but in order to get access to the programs and grants there are so many stipulations. They need to change the programs to make it easier for us to get support and for getting resources to be a less stressful process.

I am not a millionaire. I'm an average joe who works everyday to try and make a living. Why are there so many rules to get access to these programs? It's too technical, it's too much to understand.

You have to have all kinds of documents in order to get grants to recover. I have submitted all the documents but they haven't helped me. I keep giving them information all the time, but they're not doing anything.

In this parish, there's one way in and one way out. We're all against water. I don't see how they can say West Point a la Hache is in a flood zone, when down the road in Port Sulphur they're as much of a flood zone as I am.

Its like "pass the buck." I've met with my parish officials and asked them for help. They say go to FEMA, then they pass the buck. We can't get a FEMA trailer because we're in a flood zone, but if you drive six minutes from here down the road in Diamond, they don't have to be elevated like us because they have a levee system.

Where is our levee? What are they doing with it? Where is this money going? If you're not assisting our community, where is this money going? We need funds for our parish to clear debris, to clear the drainage canals.

I pay taxes on my property each year, and I'm the sole person living on my property. I need money for elevation. But when it comes to elevation sometimes there is a problem. If you're on family property, the programs might not allow you to receive grants if you don't have a direct deed to the property. But the property has been passed down through my family, it's my land.

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GENERAL It feels like our officials don't care about people in the south end of Plaquemines Parish. We ask our officials to clean our property because we had marsh water and mud, and he said the parish is broke so they don't have money to bring equipment to clean the property. The parish's objective is to go through FEMA so that FEMA can do everything and the parish can be reimbursed.

A lot of people take SBA loans and the government suggests that if we can't get access to grants we just take another loan. But we already have loans, we can't take another. We don't want everything for free but our people, my people, if we need to be elevated then it should be granted. We should be given support and resources from the government.

I feel that our officials should be doing a lot more for the people in Plaquemines Parish specifically District 7, Ironton and West point a la Hache. We were impacted the most in this parish by Hurricane Ida and got 13 feet of floodwater.

It's the same thing after every storm. No support and no protection. It's almost like they want you to move.

I'm a godly person, I'm not going to lie to the government. My home was damaged. I'm not asking for anything more than I deserve. If you're in a zone that's been impacted and devastated by the storm, you shouldn't have to jump through a million homes. Just sent the support that we need to help us get back home and rebuild in our community.

The bottom line is that the government is not helping the people. Plaquemines Parish should be ashamed of itself the way they are refusing to use their equipment to clear debris and clean up our properties. We give them the right of way to enter our property. They have received money, but they won't even clean up our property because they want FEMA to pay for it. But it's just excuses, excuses.

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We had to wait months to get into our house. There was water, mud. I had to throw everything away.

FEMA I went to FEMA many time and they didn't give me any resources because I had insurance.

There are workers who show up and are supposed to clear out ditches but they leave without finishing the projects, and we never know when the work is going to be done. We spent our own money to clear debris off our property after the storm when it should have been the parish's responsibility. We cleaned up, it wasn't parish employees, it wasn't FEMA it was family and friends who used our own equipment.

We were given cleaning supplies after the storm. For what? What are we going to clean? Our homes flooded 13 feet. We couldn't even get into our property because of the mud. The parish won't cut the grass and now we get snakes. This is a problem that happens again and again after every storm. People leave our parish! Not because they're not afraid of the wind, but because they know the water is coming.

We need food infrastructure to protect us. We need support with home elevation and weather hardening our homes so they can resist future storms. We do not have the money to leave and relocate from West Point a la Hache. This is our family land. Where should we go?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Plaquemines Parish will be included in the Most Impacted and Distressed (MID) areas for Hurricane Ida and is not part of this appropriation and Action Plan for Hurricanes Laura and Delta. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations. **With previous notices, funding was restricted for any levee construction or improvements. However, the Restore Louisiana Homeowner Assistance Program will provide funds for elevation to eligible, participating homeowners. Please visit restore.la.gov to see the current guidelines for Hurricanes Laura and Delta recovery for available homeowner repair and reconstruction program, as we anticipate the Hurricane Ida guidelines will follow along the same lines.**

PUBLIC COMMENT

Dear Ms. Lovett,

Southeast Louisiana Legal Services (SLLS) submits this comment with regard to the Proposed Master Action Plan in Response to Hurricanes Laura and Delta (hereinafter "plan"), and suggests that the Louisiana Office of Community Development could more effectively fulfill its intent to bring much needed disaster aid to disaster victims with unmet needs if it would:

- (1) **Remove, as an eligibility requirement, a FEMA determination of "major/severe" damage or above, and reconsider the current formulation of unmet needs**
- (2) **Increase the eligibility threshold for the "Flood Insurance Program" from 80 percent AMI to 120 percent AMI**
- (3) **Recognize that contractor fraud is a consistent problem among low-income disaster victims, and incorporate more specific language which includes victims of contractor fraud as eligible for program assistance**
- (4) **Utilize outreach targeted to low-income disaster victims to help increase equity program-wide**

SLLS provides free civil legal aid to low-income people residing in 22 parishes across southeast Louisiana. Our service area includes about half of the poverty population in Louisiana, one of the

poorest states in the nation. Our service area is also among the hardest hit by hurricanes and tropical events. Persons experiencing poverty are often the most disadvantaged when it comes to recovering from natural disasters for various systemic reasons, creating a large need for federal and state aid for these hard-hit communities.

OCD's plan will undoubtedly help many Louisianans experiencing poverty who are still struggling to recover from Hurricanes Laura and Delta. We applaud the OCD for recognizing that "storm and flood-related risk often corresponds with a high level of social vulnerability, compounding the impact of flood events with the challenges of poverty for many victims," and striving to design programs that fit the needs of Louisiana's most vulnerable populations.¹

SLLS has had recent experience helping clients experiencing poverty to navigate Restore Louisiana programs after the Great Flood of 2016 and Road Home after Hurricane Katrina in 2005. Our clients all fall into one or more categories of OCD's definition of "vulnerable populations," defined by the plan as including "persons under the age of 20, persons over the age of 64, persons with disabilities, persons living in poverty, and persons living in manufactured homes..."² This experience allows us a unique vantage point to identify shortcomings in the current plan, and help OCD reach its stated goal of "prioritizing those most in need of assistance with its housing programs."³

(1) OCD should remove the current eligibility requirement that FEMA's initial determination classified damage as "major/severe" or above.

In order for applicants to be considered eligible for housing assistance programs under OCD's plan, FEMA must have determined that they sustained at least "major/severe" damage as a result of the storm(s). In relation to homeowners, the plan states:

*Unless otherwise noted, the state has defaulted to HUD's definition of unmet need for owner-occupied households. Owner-occupied properties must have a FEMA real property damage assessment of \$8,000 or greater, personal property damage of \$3,500 or greater, or flooding over one foot.*⁴

In relation to renters, the plan states:

For rental properties, to meet the statutory requirement of "most impacted and distressed," homes are determined to have a high level of damage if they have damage of

¹ State of Louisiana's Proposed Master Action Plan for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana, page 32.

<https://www.doa.la.gov/doa/ocd/policy-and-reports/apa/>

² *Id.*

³ *Id.*

⁴ *Id.* at 19. (Emphasis added.)

"major-low" or higher. That is, they have a FEMA personal property damage assessment of \$2,000 or greater or flooding over one foot for rental households.⁵

As the quote above reflects, OCD has chosen to default to HUD's definition of unmet needs and adopt it as an eligibility requirement for applicants. However, HUD does not require that this framework be used by grantees as a standard of eligibility for homeowners and renters. On the contrary, HUD policy guidance largely encourages grantees to create their own individual eligibility standards to best meet unmet needs in the disaster-damaged areas.

87 FR 6364 details federal regulatory requirements for CDBG-DR funds appropriated by the Disaster Relief Supplemental Appropriations Act, 2022. This regulation requires that HUD direct the CDBG-DR appropriations to the *most impacted and distressed areas*.⁶ HUD uses this FEMA-based standard for unmet needs in order to determine which *areas*, as a whole, should be classified as "most impacted."⁷ By using this standard to determine *individual* eligibility, OCD is misapplying a standard meant to assess which *communities* are likely to have widespread disaster impact.

Further, no language contained in 87 FR 6364 requires grantees to determine individual eligibility based on HUD's definition of unmet needs. Grantees are simply required to "address a direct or indirect impact from the disaster in a most impacted or distressed area."⁸ This regulation also requires grantees to "conduct an assessment of community impacts and unmet needs to inform the plan and guide the development and prioritization of planned recovery activities."⁹

The Disaster Impact and Unmet Needs Assessment Kit¹⁰ is guidance published by HUD for the purpose of helping CDBG-DR grantees identify and prioritize unmet needs for long term community recovery. The most recent version of CDBG-DR Policy Guidance for Grantees directs grantees to consult the Assessment Kit when performing their individual unmet needs assessment.¹¹

This Assessment Kit specifically defines unmet needs as those "that are not covered by other sources and can be covered by CDBG-DR funds."¹² This definition is broad, showing that HUD's intention is for the grantee to define unmet needs based on the circumstances of each service area. Further illustrating this point, the Assessment Kit also lists many concepts which

⁵ *Id.*

⁶ 87 FR 6364, 6369

⁷ *Id.*

⁸ *Id.* at 6371.

⁹ *Id.* at 6365.

¹⁰ Disaster Impact and Unmet Needs Assessment Kit, HUD Exchange, March 2013. See Page 5. <https://www.hudexchange.info/resource/2870/disaster-impact-and-unmet-needs-assessment-kit/>

¹¹ CDBG-DR Policy Guide for Grantees, HUD Exchange, September 2019.

<https://www.hudexchange.info/resource/5873/cdbg-dr-policy-guidance-for-grantees/>

¹² Disaster Impact and Unmet Needs Assessment Kit at page 8.

“the grantee must keep in mind” while “defining the community’s unmet needs.”¹³ The concepts listed are as follows:

- CDBG-DR addresses the wider impact of the disaster and not just specific damages
- CDBG-DR allows the grantee to identify needs that were not recognized by other programs and funding sources
- CDBG-DR looks at needs at a community wide and individual level
- Unmet needs are a moving target

By stating that grantees must keep these concepts in mind when defining a community’s unmet needs, HUD is encouraging grantees to determine a definition of unmet needs that would most effectively deliver disaster aid to victims in their grant area. Consideration of the concepts listed above by OCD would encourage broader eligibility standards than the FEMA-dependent criteria currently contained in the plan.

As stated, CDBG-DR encourages the grantee to identify needs that were not recognized by other programs and funding sources. The Assessment Kit uses the example that “the FEMA Public Assistance program limits funding to rebuilding only to the pre-disaster state, while CDBG-DR allows for more expansive reconstruction that may include the incorporation of green measures into rebuilding codes and increasing the number of rental units above what were available pre-disaster.”¹⁴

This same idea can be applied to homeowners and FEMA Individual Assistance. In the majority of cases, individuals with insurance are not eligible for FEMA Individual Assistance. Knowing this, many homeowners with insurance do not apply for FEMA in the wake of a storm, forcing them to rely solely on their insurance policy to provide relief. Individuals with insurance may still have various unmet needs, caused by insurance caps or limits, contractor fraud, insurance disputes, insurance company’s insolvency, and/or other unanticipated circumstances.

In addition, FEMA applications are often automatically denied when the applicant indicates they have insurance. Many SLLS clients received an automatic denial on this ground, and were never assigned a FEMA inspector. Without an inspection, the applicant never had a chance to be classified by FEMA into one of the designated loss categories.

Under the current plan, individuals in these situations would be ineligible for assistance because they either never applied for FEMA or were automatically denied based on insurance, and as a result were not classified within the “major/severe” damage category. This oversight would allow thousands of Louisiana residents with unmet needs to fall through the cracks.

¹³ *Id.*

¹⁴ *Id.*

Further, the Assessment Kit encourages grantees to look at needs at a community wide and individual level. While HUD's use of FEMA data may be a useful tool in determining community wide needs, it is not nearly as useful when being used to determine unmet needs on an individual level. This is because low income populations are systemically disadvantaged by the FEMA. Examination of FEMA-distributed data has yielded the following finding:

Among homeowners who applied for FEMA assistance, rates of ineligibility varied dramatically by income level. The denial rate for all homeowner applicants was 26%, but those making less than \$15K/year had a denial rate of 46%. As the household's income climbed, their likelihood of being approved also increased.¹⁵

In our experience, low income and minority applicants are more likely to have difficulty obtaining the FEMA assistance they are entitled to because they often reside in "unusual" living situations, such as:

- Living in property where title has not been transferred for multiple generations, making ownership more difficult to prove;
- Adult siblings sharing an inherited residence, as separate households within a single address;
- Being at the mercy of unscrupulous landlords or relatives who put in a disaster claim on their residence, even though the other person does not actually live there;
- Having multiple dwellings on a single piece of inherited land.

Applications are often denied based on suspected fraud, simple application mistakes, or inadequate FEMA development of the circumstances, even though those individuals should be able to qualify for FEMA Individual Assistance.

In the above situations, in order to overcome this blocked application, applicants have to produce significant documentation and write an appeal. Many do not even consider appealing, because they have not even been given a denial, but have simply been locked out of the FEMA system. Low-income applicants often have greater difficulty overcoming a blocked application due to a general lack of resources, compounded by disability status, illiteracy, no internet connection, unreliable phone service, limited minutes on free cell phones, lack of transportation, and other systemic disadvantages. Thus, when an application fails, many low-income applicants are met with an insurmountable roadblock. As a result, these applicants are left with unmet needs after

¹⁵ Amelia Adams, *Low-income households disproportionately denied by FEMA is a sign of a system that is failing the most vulnerable*, *Texas Housers* (Nov. 20, 2018), <https://texashousers.org/2018/11/30/low-income-householdsdisproportionately-denied-by-fema-is-a-sign-of-a-system-that-is-failing-the-mostvulnerable/#:~:text=Among%20homeowners%20who%20applied%20for,of%20being%20approved%20also%20increased.>

the storm. Yet, they would be blocked from applying for CDBG-DR funds based on the current eligibility formulation, creating additional roadblocks on their path recovery.

The Assessment Kit also states grantees must consider that unmet needs are a moving target, and states that “as homeowners and businesses receive insurance payments and other funding, or if original funding amounts are altered, their unmet needs may change.”¹⁶ The plan notes that subsequent circumstances may affect the need of homeowners over time, and we applaud the inclusion of this broad language which allows award calculation to be reevaluated based on increased need. However, the plan does not apply the same logic to victims whose initial FEMA determination was below the eligibility threshold.

For example, an SLLS client sustained hurricane damage to her roof and received approximately \$5,000.00 for home repair, based on FEMA’s initial inspection. This amount was not enough to hire a contractor to replace her roof; thus, the client appealed the decision. The client submitted a contractor’s estimate showing FEMA that it would cost approximately \$10,000.00 to fix her roof; however, FEMA only awarded her an additional \$2,000.00. By the time she received this appeal decision, it had been months since the initial damage, which allowed mold to grow inside the home. Now, in order for her home to be safe and sanitary, the client needs to hire a mold remediation service, adding tens of thousands of dollars to her recovery in addition to the cost of a new roof.

Under the eligibility criteria within the plan, this client would not be eligible because FEMA did not determine her structural damage to total more than \$8,000.00. Her inability to procure funds swiftly caused increasing damage, which would not be considered under this eligibility standard because it happened after FEMA’s initial inspection. By basing eligibility on FEMA’s initial damage determination, OCD is not factoring in the evolution of hurricane survivors’ needs over the course of long term recovery.

In public meetings discussing this plan, many Louisianans voiced concerns that they were denied FEMA but were unable to successfully appeal that decision for various reasons. OCD representatives responded by encouraging them to contact FEMA and try to have them increase their damage determination. In our experience working with FEMA, this is not an adequate solution. FEMA requires that applicants appeal within 60 days of receiving a denial letter.¹⁷ FEMA does allow extensions of this deadline with sufficient justification at their discretion, but will only consider an extension within 90 days of the original deadline.¹⁸ It has now been over a year since the application period for Hurricanes Laura and Delta have passed. The significant passage of time makes it incredibly unlikely that FEMA would allow an appeal at this stage.

¹⁶ Disaster Impact and Unmet Needs Assessment Kit at page 8.

¹⁷ FEMA, Individual Assistance Program and Policy Guide, May 2021, page 66.

¹⁸ Id. at 271.

Thus, OCD's suggestion that homeowners rely on FEMA to correct damage determinations at this point is not a viable solution.

In order to best assess the unmet needs of all individuals in areas most impacted by Hurricanes Laura and Delta, OCD should accept applications from homeowners and renters in the service area, regardless of their FEMA status. The other eligibility criteria for each program will provide a sufficient gatekeeping function without also requiring a FEMA damage assessment over a certain level. OCD would best fulfill their goal of meeting the unmet needs of vulnerable Louisianans by assessing each individual applicant's situation holistically.

(2) To increase equity and maintain consistency throughout the plan, the "Flood Insurance Program" eligibility threshold should be increased to 120 percent AMI

The plan correctly acknowledges an estimated *seventy-five percent* of homeowners whose property sustained damage in Hurricanes Laura and Delta *did not have insurance*.¹⁹ One reason for low take-up rates for insurance, particularly flood insurance, is that premiums are often cost-prohibitive for lower-income households.

In the aftermath of a storm, the cost of flood insurance in the affected areas increases by flood plain rezoning.²⁰ In 2018, the average flood insurance premium along the Gulf Coast was \$5000.00.²¹ Standard homeowner policies in Louisiana and across the United States do not cover flood damage; purchasing and maintaining costly flood insurance policies poses significant financial strain for households under the median income wage. For senior citizens living on a fixed income who have secured reverse mortgages, the disproportionate cost of flood insurance can inevitably lead to foreclosure.²² As the plan correctly states:

It is safe to conclude that flood is likely to remain HUD and LA MID's and the entire threatening hazard. This is because floods are the by state's costliest, most ubiquitous, and most life-threatening hazard. This is because floods are the by-product of several other hazards including thunderstorms, tropical cyclones, coastal hazards, dam failure, and levee failure.²³

Accordingly, taking measures to reduce the cost of flood insurance would significantly improve the disaster resilience of low to moderate-income households statewide. Commendably, the

¹⁹ Louisiana Office of Community Development, Laura Delta Action Plan, page 11.

²⁰ Lone Star Legal Aid and Texas Rio Grande Legal Aid, *Legal Needs After a Disaster* (Sep. 24, 2018), https://www.disasterlegalaid.org/library/item.689188-Legal_Needs_After_a_Disaster.

²¹ Carolyn Kousky and Helen Wiley, *Improving the Post-Flood Financial Resilience of Lower-Income Households through Insurance*, at 2, (Jan. 2021) https://riskcenter.wharton.upenn.edu/wp-content/uploads/2022/04/Improving-LMI-Household-Flood-Insurance-Options_Issue-Brief.pdf.

²² Consumer Financial Protection Bureau, (Sep. 24, 2021), <https://www.consumerfinance.gov/ask-cfpb/do-i-still-need-to-pay-my-property-taxes-and-home-insurance-with-a-reverse-mortgage-loan-en-235/>

²³ Louisiana Office of Community Development, Laura Delta Action Plan, page 99-100.

proposal acknowledges plans for flood insurance assistance in conjunction with rehabilitation and reconstruction of owner-occupied homes.²⁴ Specifically, allowing an exception for applicants under 120 percent AMI that were unable to keep flood insurance is a major step toward increasing equity throughout the program. The Flood Insurance Program, which provides a year of initial-required flood insurance coverage to low-income households, is also step toward increasing equity. However, the plan identifies eligible applicants as those “at or below 80 percent AMI adjusted for household size.”²⁵

To increase equity and maintain consistency throughout the plan, this eligibility threshold should be increased to 120 percent AMI. The “Flood Insurance Requirements” section of the plan factors in applicants between 80-120 percent AMI, and recognizes that those households may have trouble maintaining flood insurance. The same logic should apply to applicants who need initial flood insurance coverage, yet may struggle to afford it, creating a barrier to accessing other program funds.

- (3) OCD should recognize that contractor fraud is a consistent problem among low-income disaster victims, and incorporate more specific language which includes victims of contractor fraud as eligible for program assistance**

Without adequate financial resources to recover, desperate due to the difficulties in finding an available contractor, or both, many low-income disaster victims make decisions out of desperation with negative long-term impacts. An example of such a decision is hiring the services of a contractor who turns out to be fraudulent.

Although Louisiana imposes criminal liability for contractor fraud, the number of claims that end up going to court are abysmal compared to the number of instances alleged. In fact, since 2015, there have been less than 100 cases of contractor fraud brought before the courts in southeastern Louisiana. According to a 2021 interview with Brad Hassert, compliance director for the state board that issues contractor licenses, the issue is due partially to law enforcement’s lack of industry knowledge and because it is challenging to locate out-of-state fraudulent contractors.²⁶ Moreover, Louisiana’s licensing board cannot conduct investigations or prosecute unlicensed contractors.²⁷

Therefore, it is hard to get accurate statistics about the occurrence of contractor fraud in Louisiana, leaving countless hurricane victims with additional damages for which there is no

²⁴ *Id.* at 13.

²⁵ *Id.* at 108.

²⁶ Greg LaRose, *WDSU Investigates: Most contractor fraud convictions involve locals; out-of-towners harder to track*, (Nov. 23, 2021), <https://www.wdsu.com/article/wdsu-investigates-most-contractor-fraud-convictions-involve-locals-out-of-towners-harder-to-track/38148997>.

²⁷ *Id.*

recovery. Moreover, the inability to conduct accurate statistical analysis in instances of contractor fraud makes it difficult for any recovery plan to address accurately.

This blind spot creates a significant unmet need that is well-suited to be more specifically addressed by the plan. OCD rightfully acknowledges that funds unavailable to the applicant should not be considered in a duplication of benefits analysis, and specifically notes contractor fraud as one of these instances.²⁸ However, the phrase “contractor fraud” only appears twice throughout the entire plan. The scope of the problem for low-income applicants necessitates that OCD add specific language to the plan, including victims of contractor fraud as eligible disaster victims.

(4) OCD should utilize outreach targeted to low-income disaster victims to help increase equity program-wide

In a study conducted in 2018, it was discovered that an estimated 150,000 children in the state of Louisiana lack access to the internet.²⁹ According to this study, the two main obstacles to internet access are location and affordability.³⁰ Many Louisiana residents live in rural communities where access to the internet is limited to satellite services. The average monthly cost of internet services is \$55, which is more than an entire day’s pay for someone earning minimum wage. Therefore, it is difficult, if not impossible, for many Louisiana residents to access information contained solely on the internet.

The consequence of a lack of internet access results in an inadvertent bar to recovery assistance for families that is wholly preventable. By communicating with community leaders in these areas, the state can ensure more people are provided with the requisite knowledge needed to get the assistance they need. The plan should include specifically-tailored measures to meet the communication means and means of the vulnerable population of the community.

OCD’s Proposed Master Action Plan will undoubtedly help many still struggling to recover from Hurricanes Laura and Delta. However, without implementation of policies that focus on equity, the most vulnerable populations will not be adequately addressed by this plan.

Thank you for your time and attention.

²⁸ Louisiana Office of Community Development, *Laura Delta Action Plan*, page 93.

²⁹ Neva Butkus, Louisiana Budget Project, *Separate and unequal: Students’ access to technology in the time of coronavirus*, (May 19, 2020), <https://www.labudget.org/2020/05/separate-and-unequal-students-access-to-technology-in-the-time-of-coronavirus/>.

³⁰ *Id.*

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCDs Restore 2020 program guidelines prioritize low to moderate income homeowners with FEMA verified major/severe damage in order to insure those with the greatest need are able to be assisted and get back into their homes. The guidelines reflect the letter and spirit of HUDs applicable rules regarding this funding award while prioritizing the most vulnerable populations. Program guidelines recognize that contractor fraud can occur and address this eventuality under the Solution 2 program. Please see the current guidelines (for Laura/Delta) for available homeowner repair and reconstruction program at Restore.LA.Gov. Finally, all outreach which is undertaken by OCD is sensitive to the fact that not all stakeholders are accessible via computer and internet access. The citizen participation plan which is part of the Action Plan provides for multiple methods of communication with citizens, including newspaper, internet, public meetings (in person and virtual). OCD also insures that all outreach includes representatives of stakeholder groups which work with and advocate on behalf of underserved groups. We invite any and all suggestions on how to improve upon our means and methods for reaching all of Louisiana's citizens who are affected.

PUBLIC COMMENT

COMMENTS



I participated in the Restore LA meeting in LC on April 7th & noon. I find the plan to be very detailed and should be able to meet the needs of our community. My "only" concern is that there will be a checks & balance system in place so that residents don't receive funds from both programs & everyone's needs aren't met. This has happened before and programs run out of money. I believe that those of us in the "100 year flood plain" that won't be allowed to repair or rebuild should be looked at first. My home survived "ALL" of the hurricanes with only roofing damage but flooded →

met on May 17th. I did not have flood insurance, only homeowners and cannot afford to repair my home which has over \$80,000 in damage which includes a cracked foundation. I registered as I was told. I just hope that flood victims are prioritized. My street never flooded the 23 years that I've been in my home, this was the first. I am still living there because with rental prices there is no where else to go.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program prioritizes potential applicants based on income, age, and disability. The presence or lack of flood or homeowners' insurance, or proximity to flood zones, are not part of the prioritization at this time. Appropriations for Hurricane Ida and the May 2021 Floods are not part of this Action Plan. The state is waiting on the Federal Register Notice to be provided by HUD for those appropriations.

PUBLIC COMMENTS PUBLIC HEARING 4.12.22

PUBLIC COMMENT

"Thanks my 11 year son and I are excited about a new home. I had recently repaired our home a few months before the storm."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please be sure to submit a survey for Restore Louisiana Homeowner Assistance Program, which can be found at restore.la.gov or by calling 866.735.2001.

PUBLIC COMMENT

"This is not a question but I hear Calcasieu Parish. Please do not forget the residents of Cameron Parish specifically the north central portion. The Grand Lake community where the majority of the parish population resides."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Cameron Parish is included in the list of Most Impacted and Distressed areas for the program, as determined by HUD.

PUBLIC COMMENT

We are finding that new policies will likely be more than and may be significantly more than \$2K while it might have been \$1700 before RR 2.0.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program will be offering flood insurance assistance to qualifying applicants that will take care of the premium for the first year of coverage. Applicants who participate in the program are given high-level budgetary counseling in order to prepare for paying the premium once the year has concluded. Additional information regarding FEMA NFIP 2.0 can be found on their website <https://www.fema.gov/flood-insurance/risk-rating>.

PUBLIC COMMENT

"How do we get access to this presentation the recording and the slides? Thank you"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes we will send out the presentation tomorrow and a version of it can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Can we get the slides presentation

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes, we will send out the presentation tomorrow and a version of it can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Calcasieu Parish has more than 59% damages due to Hurricane Laura and Hurricane Delta. Most probably around 78%. HUD assistance will be better utilized by helping people rebuild their houses. That should be the main focus of this program.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. By our estimates we have budgeted adequately to repair/rebuild the home of every eligible homeowner.

PUBLIC COMMENT

Does the Flood Insurance Program assume that the homes are in low risk areas or assume freeboard to take advantage of freeboard discounts? Is it limited to houses in the OCD repair or reconstruction programs or any houses damaged and repaired?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Flood Insurance Assistance Program is limited to LMI households in the Restore Louisiana Homeowner Assistance Program where flood insurance is required by federal statute. Applicants should inquire about freeboard discounts with their insurance provider. The Restore Louisiana Homeowner Assistance Program requires BFE/ABFE +2' or the jurisdiction requirement, whichever is greater, for all reconstructions. The program requirement was communicated to all parish officials and permitting offices in the fall of 2021. Additional information regarding FEMA NFIP 2.0 can be found at their website <https://www.fema.gov/flood-insurance/risk-rating>.

PUBLIC COMMENT

With the implementation of Risk Rating 2.0 and the potential for flood insurance rates to significantly increase is there any anticipation that additional funding will be appropriated for the flood insurance programs? This is assuming that people who currently have coverage (and have the option to) decide to drop their policy.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Flood Insurance Assistance Program is a supplemental program designed to assist eligible LMI homeowners actively participating in the Restore Louisiana Homeowner Assistance Program who are required to provide proof of flood insurance prior to receiving grant funds. Currently \$500,000 is the proposed budget for the Hurricanes Laura and Delta allocation.

PUBLIC COMMENT

Is the HMGP Global Match going to be limited to LMI individuals or a block grant to the Parish?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We plan to select specific projects that primarily benefit LMI households and fund those projects with CDBG funding. This will cover the match of all Hazard Mitigation Grant Program (HMGP) projects.

PUBLIC COMMENT

What is the Area Median Income for SWLA

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For Calcasieu and Cameron parishes 50% AMI is \$22650 for one person; \$25900 for two people; \$29150 for three people; and \$32350 for four people. 80% AMI is \$36250 for one person; \$41400 for two people; \$46600 for three people and \$51750 for four people.

PUBLIC COMMENT

Will the Restore Homeowners Program continue to be a reimbursement program for 2020/21 storms and if so will the outreach people as yourself explain that homeowners will have to pay upfront for all repairs and wait for reimbursement.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For Solution 1, no funds will be required from the homeowner other than funds previously provided for the purpose of rebuilding or reconstruction, e.g. FEMA home repair funds insurance etc. For Solution 2, the program pays for completed construction progress with up to 5 progress payments. It is important for homeowners participating in Solution 2 to have a project plan and draw schedule that facilitates cash flow for their project. Reimbursement, or Solution 3 funds, will be available for work that was completed prior to the program damage assessment. Reimbursement funds can be determined once a program damage assessment is complete and then funds are paid immediately after grant execution.

PUBLIC COMMENT

Thanks so much for all of this information! When will the process start for rebuilding? I've had my home demolished as requested by the city.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The current anticipated launch for the Restore Louisiana Homeowner Assistance Program is summer 2022.

PUBLIC COMMENT

"I heard that there are applications open at the state in anticipation of proposed programs. Is that true? If the State is not taking applications at this time will it have the capacity to accept and use data gathered by the Parish to jumpstart the program intake process? If so can the State share the draft criteria that are required for each program to avoid sending clearly ineligible applicants?"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The survey is currently open for all federally declared disasters of 2020 and 2021. The basic eligibility criteria for the Restore Louisiana Homeowner Assistance Program can be found at restore.la.gov. The anticipated launch date for the Restore Louisiana programs is summer 2022.

PUBLIC COMMENT

Will RFPs be published for each Program (seperately)?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We have already posted an RFP for the construction management services. We expect to also procure program management services, as well as others

PUBLIC COMMENT

How long do you anticipate time table from Phase 1 to get to Phase 6?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. It depends on how many homeowners complete the survey, and how quickly. It could be as short as a couple of months but could be longer.

PUBLIC COMMENT

Is the COVID funding on the same timeline as the other funds?

OCD RESPONSE NO COVID funding is through the US Treasury and not a part of this Action Plan or this allocation of funding to Louisiana. For more information on COVID funding and programs please visit www.lacovidhousing.com

PUBLIC COMMENT

Does this mean that if the Fed designates more funds that the public comment period keeps getting pushed back?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We do not anticipate additional funds for Hurricanes Laura and Delta, but regardless we do not expect to restart the public comment period for this Action Plan. If additional funds were to become available, we would likely do an Action Plan Amendment to incorporate those funds.

PUBLIC COMMENT

Can you please show the slide that shows eligibility for this program or the info? Also do you have to have all the requirements to be eligible for this program? Thanks

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If additional funds were to become available, we would likely do an Action Plan Amendment to incorporate those funds. Eligibility criteria and the slideshow for this presentation can be found on the program website at <https://www.restore.la.gov/action-plan>.

PUBLIC COMMENT

Looking back at the slides are you saying that if we received more than \$25k in insurance proceeds that we will not be eligible for HMGP? We can not replace our house for Rebuild.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Homeowners who received more than \$25,000 from insurance proceeds may have the ability to participate in the Restore Louisiana Homeowner Assistance Program which is a separate program than HMGP. In the event of eligibility, remember that all funds received by FEMA, SBA, insurance, etc. for repair of the structure would be counted as duplication of benefits and would be included in the grant award calculation.

PUBLIC COMMENT

Will the program be available to folks who were underpaid by their insurance companies? I received a check from insurance that only covered 25% of my expenses. I've already completed my repairs. Would that 75% I spent out of pocket be something I could pursue through the program?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the amount you received from insurance was the policy maximum and you still have unmet needs to complete repairs, the additional repairs could be eligible for the Restore Louisiana Homeowner Assistance Program. Please refer to the current program guidelines for reimbursement criteria at <https://restore.la.gov/>.

PUBLIC COMMENT

Can we use the funds to purchase new mobile homes?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Mobile home replacement is generally eligible for homeowners who qualify for the Restore Louisiana Homeowner Assistance Program, but subject to specific program guidelines. Please refer to current program guidelines at <https://restore.la.gov/>.

PUBLIC COMMENT

Does this program include Repairs/Replacement of Mobile homes

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Mobile Homes are eligible structure types for the Restore Louisiana Homeowner Assistance Program. Please refer to current program guidelines at <https://restore.la.gov/>, for more information regarding repair and replacement parameters.

PUBLIC COMMENT

If you cannot live in your mobile home. Can you tear the mobile home down or should you wait until someone from your program comes out to do an assessment? FEMA can assist me with temporary rental assistance.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Be sure you reach out to your local jurisdiction before demolishing your home. Please refer to current program guidelines at <https://restore.la.gov/>.

PUBLIC COMMENT

Thank you Judi. Cameron parish is certainly identified as a Most-Impacted and Distressed area by both the state and HUD. This means impacted residents may be eligible for assistance and are encouraged to complete the survey here: <https://restore.la.gov/> (Note: FEMA registration number will be needed to complete the survey)

PUBLIC COMMENT

How will developers be notified of funding availability in each sector?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We will advertise through a Notice of Funds Availability when the rental programs start up. These notifications will come from OCD and the Louisiana Housing Corporation, and we also plan to promote through press outlets and reach out through other less formal channels as well to reach as many eligible recipients as possible. Please monitor the program website, restore.la.gov, for program updates.

PUBLIC COMMENT

Thank you. I am registered and have completed survey. Our home was destroyed and we are older than 62. A 30 yr mtg is not an option. The \$884 per month FEMA rent is going to be difficult. We are middle income but now that inflation is 8.5 percent our income does not go as far with utilities groceries and fuel cost rising. Will AMI be recalculated based on cost of living?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. AMI is not

specifically calculated based on the cost of living. Please be sure to work with your FEMA Advisor to submit the hardship documentation to potentially reduce the amount of monthly rent. You can also reach out to the Disaster Case Management program as well at dcmpla.com.

PUBLIC COMMENT

When I originally applied for the HMGP I was told that we could not begin any part of the rebuild process. We had insurance but under insured. Now costs have doubled. FEMA is now requiring us to pay a high monthly rent.

OCD RESPONSE Please be sure to work with your FEMA Advisor to submit the hardship documentation to potentially reduce the amount of monthly rent. You can also reach out to the Disaster Case Management program as well at dcmpla.com.

PUBLIC COMMENT

Does HUD require a 2 foot freeboard for all substantially damaged homes repaired or reconstructed?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes, HUD requires a minimum of 2-feet above Base Flood Elevation (BFE) for substantially damaged/improved or reconstructed structures. The current draft program guidelines can be viewed at restore.la.gov website.

PUBLIC COMMENT 4.12.22

I had major damage total loss was approved for a SBA loan but it really did not cover all my costs for a new home. I also have a disabled child and will need to build a ramp and porch once my home gets here. We put down payment on a manufactured home March 2021 and tentatively will be delivered mid may. Would I be eligible for help to finish getting my new home set up? I was in an old mobile home with no homeowners available to me due to age."

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Your survey has been received, you will be notified by the program when the application period opens. Solution 3 (reimbursement) funds are available for mobile home replacements up to \$85,000 for a single-wide mobile home unit. 504 Disability accommodations must be requested during the application process, and if awarded, will be in addition to the \$85,000 funding cap. Please be sure to read the guidelines carefully regarding MHU reimbursements and to ensure that you meet the elevation requirements of the program or your parish, whichever is greater. All funds received from FEMA, SBA, insurance, etc. would be considered a duplication of benefits and would be included in the grant award calculation.

PUBLIC COMMENT

I had work done on my home thru the SBP. To make my home sound enough to live in repairs was limited. I still have rooms that need repair such as gut and replacing walls. I did not have insurance at time of the hurricane will I be eligible for additional help

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. You are encouraged to complete the Restore Louisiana Homeowner Assistance Program survey at restore.la.gov. Also you are encouraged to reach out for further assistance to the Disaster Case Management program at dcmpla.com

PUBLIC COMMENT

Who is the Disaster Case Manager service provider where people who are in need can outreach?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The application information for the Disaster Case Management program for individuals impacted by Hurricanes Laura/Delta can be found at dcmpla.com.

PUBLIC COMMENT

I'm currently working on my home but my funds are running out. And I won't be able to finish to make it liveable. My floors has soft spots and some places has holes. I just need some help on the things I can't do"

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The City of Lake Charles just announced the launch of a local repair program for residents within the city limits. More information can be found here: <https://lchrrp.com/>.

THE FOLLOWING COMMENT CARDS WERE SUBMITTED AT THE APRIL 7 PUBLIC HEARING

- ~~Not~~ - NOT just assist with Flood insurance
lots of homeowners can't afford regular,
homeowners insurance. Folks on SSI,
disability. Most damaged homes (are) NOT restored
due to NO T.N.S. Coverage at All.
- Also once your group help with Flood insurance
for a year - Who will educate them on how
to manage their finances to continue
with coverage for life time.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Qualifying applicants who participate in the Restore Louisiana Homeowner Assistance Program are eligible for flood insurance assistance that will take care of one year of flood insurance coverage. The recipients of this grant are given high-level budgetary counseling in order to prepare for paying for the premium when the policy has concluded. Flood insurance is required by HUD for properties in a Special Flood Hazard Area that have received previous federal funds for repair.

COMMENTS

under Infrastructure & Economic Revitalization or Public Services

Will there be any funds available for Health care organization like SWLA center for Health services? most of the patients we serve are low income, uninsured, or on Medicaid. We are still waiting on FEMA but we know there will be a non-federal share our organization will be responsible for. Could we apply for the Match program. Our health care organization has been a safety net for the uninsured and under insured for over 45 years and employe about 100 employee just in Lake Charles. we need funding assistant to continue providing services in a safe environment



RESTORE
LOUISIANA

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state has committed funds to offset the burden of the non-federal share match requirements faced by local entities and jurisdictions. The Non-Federal Match Program policy document will be posted on the Restore website, restore.la.gov, once the program is launched.

is that I lived in my grand-parents home when it was destroyed by the hurricanes. Right now I'm living with a friend. I need help in trying to get the property clean off or to rebuild. I have run out of options, the city sent a letter telling me they would clean it if I would pay for it through my property taxes. The house is destroyed what do you suggest. If you have any solutions give me a call at 337-532-0642 I am 65 yrs old and don't have the funds. Thank you.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For information regarding ownership criteria, please reference the Restore Louisiana Homeowner Assistance Program policy guidelines on our website at restore.la.gov and pay special attention Page 75 (Individual-level Eligibility).

COMMENTS



we need more Affordable housing for ppl like me, I'm on disability + can't find a nice place of reasonable in price. More apartment complexes that go by my income are needed.

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Action Plan includes affordable housing, new and repairs, as this is one of the primary activities for which CDBG DR funds may be used.

COMMENTS



IS there a way to prioritize moderate income families who are required by a court order to live in a certain area so they can find affordable housing?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Surveys submitted to the Restore Louisiana Homeowner Assistance Program are prioritized by income, disability and age. Please see current program guidelines at restore.la.gov.

When you say low to moderate income what is that range.

RESTORE.LA.GOV

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Low to Moderate Income (LMI) is up to 80% of the Median Income of a given area. So, if you make up to 80% of your area median income, you would be considered as LMI. Income limits by parish are determined by HUD and can be found at https://www.huduser.gov/portal/datasets/il/il2021/select_Geography.odn.

COMMENTS



**RESTORE
LOUISIANA**

Home ownership proof (i.e. good title)
should be relaxed for those who
title can not be corrected pragmatically

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Properties that have been seized or adjudicated are reviewed on a case by case basis. Regardless, the program cannot provide funding for a home that is no longer owned by the applicant. Additionally, no grant award funds are available for clearing the title of a home. Please see page 75 of the Restore Louisiana Homeowner Assistance Program policy guidelines at restore.la.gov.

COMMENTS



It is a fact that homeownership vs renting strengthen communities. I would like to see more focus ~~on~~ on ownership. The supplemental funds to rebuild rental homes gives a timeframe of 30 years. A home can be paid off in 30 years building wealth and strong communities. Most often a mortgage payment will be less than rent here in Lake Charles. I've commented before but I am still very concerned about funds being allocated to North Lake Charles. There must be transparency

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD strives for transparency and accountability in all of its programs. OCD supports home ownership and has provided funding in its Action Plan to support programs to encourage home ownership, such as, soft second programs.

- Representing Kingsley's Building Solutions [Derrick Edwards - owner]
- local Community Builder
- Focus Area is Affordable housing primarily in Gossport, car shop,
- Built + Renodeled + 80 homes since the storm
- Building Affordable housing is our current model. We are well respected in the low income area as well as investment builders
- Question: How do we work together with the project to help rebuild our communities? We have a wealth of knowledge in building affordable homes and we request a formal meeting to discuss the plan of action in details
- We are Adequately to Support "Solution 1 or Solution 2"
- * Would it be possible to be a Community Advisor RESTORE.LA.GOV on the Board to Support the local Community?

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD has advertised for its Solution 1 contractors and the procurement process is underway. The requirements for Solution 2 contractors performing work under Restore 2020 can be found within the program's policies and procedures which are available on-line at <https://restore.la.gov/>.

COMMENTS



These events cause an increase in adjudicated properties and keep them out of commerce. These properties for the most part are outside of flood zones, in low to moderate income areas, and have infrastructure (electricity, sewer, water, streets, etc.). Could HUD through Restore Louisiana implement a program to assist with quieting titles to spur redevelopment or put together a fund to insure title risk so financing to build and redevelop becomes a viable option to encourage economically feasible infill development. The biggest obstacle to adjudicated properties is not necessarily clearing the title as much as having title insurance to allow for redevelopment.

The municipalities can allocate adjudicated properties to community development corporations (CDC) to engage developers. If a developer does not have to bear infrastructure costs or even land acquisition costs and basically build housing with materials and labor costs. Their margins should be met and housing should be priced affordable rates. The infill in qualified no flood zones in low to moderate income communities with quality affordable homes built to new storm standards will result in more resilient communities - a win win situation. I would like consideration given to ~~a~~ fund and claim mechanism to offer the benefits of title protection and investment encouragement for housing. } program to develop and implement a

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. All CDBG funds must have a tie-back to the disaster funding source. There are programs in the housing section of the Action Plan that allow options for funding new affordable housing developments.

COMMENTS



Please consider funding to set-up satellite sites throughout Calcasieu Parish for residents to come and get assistance in applying for these programs. Sites such as churches & non-profits with funding for training volunteers, expanding wifi services, printing/copying etc. This parish has a huge population of under educated citizens, but also has large networks of faith based groups and non-profits.

Thank You

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold outreach events in the Most Impacted and Distressed (MID) parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions.

- How can we assure that the information properly reaches the hands of an elderly population?
 - Is there an opportunity for those who missed the initial sign up?
 - If we can be of assistance, please let us know.
 - Can someone provide this information to our seniors at our facilities.
- Thank You!

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OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold Outreach events in the MID parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions now.

- Will the funding assist with future housing initiative that the council has planned? (Section 202 grant proposals)
- Thank You!

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The program will make all efforts to hold outreach events in the Most Impacted and Distressed (MID) parishes. These events will be made known to the public in advance. The program has also worked to streamline required applicant documentation to a minimum. We also have trained Case Managers available at 1-866-735-2001 to assist with survey submissions.

The Action Plan does address programs that will increase rental property availability. These programs are administered by the Louisiana Housing Corporation and Notices of Funding Opportunity will be

advertised by that agency.

Will there be funds for investors that are purchasing properties restoring them for rent or purchase

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OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Action Plan does address programs that will increase rental property availability. These programs are administered by the Louisiana Housing Corporation and Notices of Funding Opportunity will be advertised by that agency.

FEMA

See Attachments - Public Comment
on Program Management RFP ~~Criteria~~ Criteria Change

COMMENTS



What about individuals who were denied rental assistance by FEMA; how do these individuals restore and recover from the extra monies used above their monthly allocated budget for rent. I spent \$15,190.00 above my monthly normal rent budget for an apartment for 14 months. I have depleted my savings. Why can't the renter have some funds to help recover preparing for upcoming storm season funds in savings low. RESTORE.LA.GOV -over-

OCD RESPONSE Thank you for your comment on the proposed revised action plan for recovery from Hurricanes Laura and Delta. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program offers housing assistance to active grantees who are otherwise unable to find temporary lodgings while their home is being repaired/reconstructed. Reimbursement for interim housing is not offered by the program. For this, please contact the Louisiana Housing Corporation at <https://www.lhc.la.gov>. It may be possible they can assist with your current rental expenses.