

STATE OF LOUISIANA

# Proposed Master Action Plan

FOR THE UTILIZATION OF COMMUNITY  
DEVELOPMENT BLOCK GRANT FUNDS

*In Response to 2020 and 2021 Federal Declarations In Louisiana*



**LOUISIANA**  
Office of  
**COMMUNITY**  
**DEVELOPMENT**

APRIL 1, 2022

P.O. BOX 94095, BATON ROUGE, LA 70804  
MAIN 225.219.9600 • FAX 225.219.9605

## ABSTRACT

---

In 2020, as the State of Louisiana combatted and mitigated the catastrophic impacts of the Coronavirus 2019 (COVID-19) global pandemic, five named storms made landfall during hurricane season, breaking the state record for the most strikes in a single season. Three of these events, Hurricane Laura in August, and Hurricane Delta and Zeta in October, resulted in 30 parishes receiving a disaster declaration for the Federal Emergency Management Agency (FEMA) Individual Assistance (IA). Hurricanes Laura and Delta devastated 24 parishes combined and qualified for appropriation under Public Law 117-43.

Sever weather continued to impact Louisiana in 2021. A severe winter storm in February, severe storms and flooding in May, and Hurricane Ida in August all resulted in major disaster declarations from FEMA. These three events resulted in 49 parishes across the state receiving a disaster declaration for FEMA IA.

As has been demonstrated through these repeated weather events, the impacts of climate change are being felt in Louisiana. The state has designed the recovery and mitigation programs outlined in this Action Plan to increase resilience to the impacts of climate change and ensure a focus on equity in recovery.



LOUISIANA  
Office of  
COMMUNITY  
DEVELOPMENT

# AMENDMENTS

---

# TABLE OF CONTENTS

---

<b>1. Executive Summary .....</b>	<b>1</b>
Overview .....	1
Disaster Specific Overview .....	1
Summary .....	9
Proposed Allocation Amounts .....	12
Unmet Need and Proposed Allocation - 2020 .....	12
Unmet Need and Proposed Allocation - 2021 .....	13
<b>2. Unmet Needs Assessment .....</b>	<b>14</b>
Overview .....	14
a. Housing Unmet Need .....	17
Disaster Damage and Impacts .....	17
1. Single-Family v. Multi-Family; Owner Occupied v. Tenant .....	25
FEMA IA Owner Occupied .....	25
FEMA IA Tenants Applicants .....	26
FEMA IA Applications by Housing Type .....	27
FEMA Real Property Damage Owner Occupied Units .....	27
FEMA Real Property Damage Rental Units .....	29
2. Public Housing and Affordable Housing .....	30
Multifamily Assisted Housing - 2020 .....	30
Multifamily Assisted Housing - 2021 .....	31
Public Housing Authorities Damaged - 2020 .....	31
Public Housing Authorities Damaged - 2021 .....	31
Owner with Unmet Need in a Floodplain .....	31
Insurance Claims and Losses in Disaster Impacted Areas .....	32
Total Home Loans Approved by SBA .....	33
Social Equity, Fair Housing and Civil Rights .....	33
Grantee Demographics and Disaster Impacted Populations .....	43
Education Demographics .....	43
Income Demographics .....	44
Income Demographics - Low Income .....	44
LMI Analysis - Overall .....	44
LMI Analysis - Federally Declared Disaster Areas .....	45



Manufactured Housing Units Impacted by Disaster .....	46
SNAP and D-SNAP Applicants Impacted by the Disaster.....	46
Limited English Proficiency Breakdown of Disaster-Related Areas.....	46
Affected Continuum of Care Entities.....	49
Point-in-Time Count - Type of Shelter.....	50
Point-in-Time Count - Impacted by Disaster .....	50
Assisted Housing Impacted by the Disaster .....	50
<b>b. Infrastructure Unmet Need. ....</b>	<b>52</b>
Disaster Damage and Impacts. ....	52
FEMA Public Assistance Program.....	54
Total Cost and Need by PA Category .....	54
Approximate Recovery Cost per Agency .....	55
Hazard Mitigation Needs per County or Known Project .....	55
<b>c. Economic Revitalization Unmet Need. ....</b>	<b>56</b>
Disaster Damage and Impacts. ....	56
Summary of Economic Unmet Needs .....	59
Total Business Loans Approved by the SBA.....	60
SBA Applicant Breakdown .....	61
iv. Estimating Business Operations Losses.....	61
Increased Occupation Demands .....	62
<b>d. Mitigation Only Activities .....</b>	<b>62</b>
<b>3. General Requirements.....</b>	<b>66</b>
a. Citizen Participation.....	66
Outreach and Engagement.....	66
Public Hearings. ....	71
Complaints .....	72
b. Public Website .....	73
c. Amendments.....	73
Substantial Amendment .....	74
Non-Substantial Amendment .....	74
d. Displacement of Persons and Other Entities.....	74
e. Protection of People and Property.....	75
Elevation standards .....	75
Flood Insurance Requirements.....	76
Construction Standards .....	77



Contractors Standards .....	80
Preparedness, Mitigation, and Resiliency.....	81
Broadband Infrastructure in Housing .....	92
Cost-Effectiveness.....	93
Duplication of Benefits .....	94
<b>4. Program Budget .....</b>	<b>98</b>
Overview.....	98
Program Budget - 2020 .....	103
Program Budget - 2021 .....	105
Connection to Unmet Needs .....	107
Leveraging Funds .....	107
Distribution of Funds.....	109
Program Income .....	110
Pre-Agreement Cost .....	111
Resale or Recapture.....	111
b. Program Details .....	113
Housing Programs.....	113
Infrastructure Programs .....	141
Economic Revitalization Programs .....	147
<b>5. Appendix.....</b>	<b>150</b>
a. Certifications.....	151
b. Waivers .....	153
c. Summary and Response of Public Comments .....	155
d. Data Sources/Methodologies .....	155
E. Important Definitions and Terms .....	155
f. Standard Form 424.....	157
<b>6. Attachments .....</b>	<b>158</b>
I. OCD Disaster Outreach Meetings, 2020 and 2021 .....	158
II. Unmet Housing Needs.....	166
III. Impact on Homeless Populations .....	169
IV. Public Comment Responses .....	173

# 1. EXECUTIVE SUMMARY

---

## OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Louisiana will receive \$1,050,131,000 in funding to support long-term recovery efforts following Hurricane Laura and Hurricane Delta: FEMA DR 4559 & 4570 through the Louisiana Office of Community Development - Disaster Recovery Unit. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in Louisiana.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$1,050,131,000 in CDBG-DR funds to the State of Louisiana in response to both Hurricane Laura and Delta: FEMA DR 4559 & DR 4570, through the publication of the Federal Register, FR-6303-N-01 (Awards and Allocations - HUD Exchange). This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43).

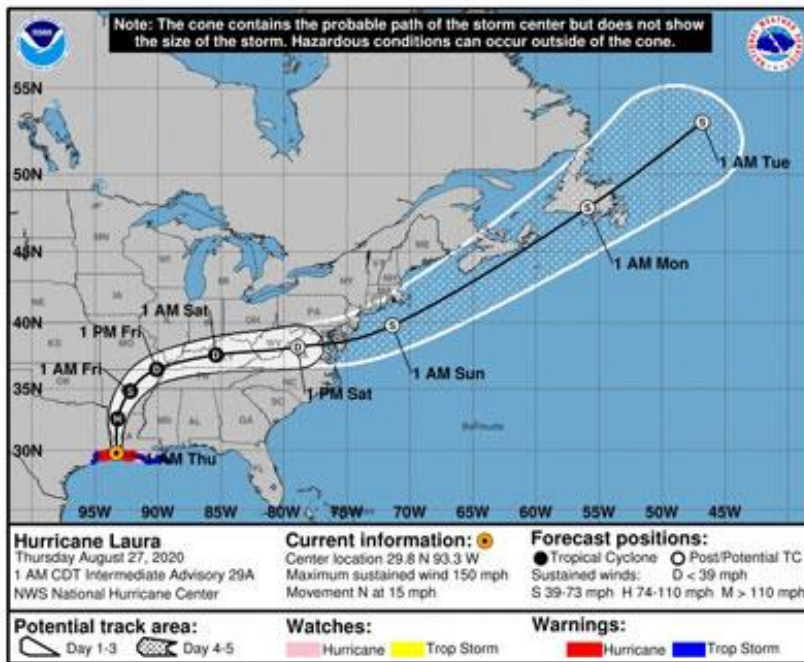
## DISASTER SPECIFIC OVERVIEW

### 2020 STORMS

Louisiana was impacted by three major disasters in 2020 – Hurricane Laura (DR-4559), Hurricane Delta (DR-4570), and Hurricane Zeta (DR-4577). Combined these storms resulted in 47 of Louisiana’s 64 parishes receiving a disaster declaration for FEMA IA, 24 of which are qualified for appropriation under Public Law 117-43.

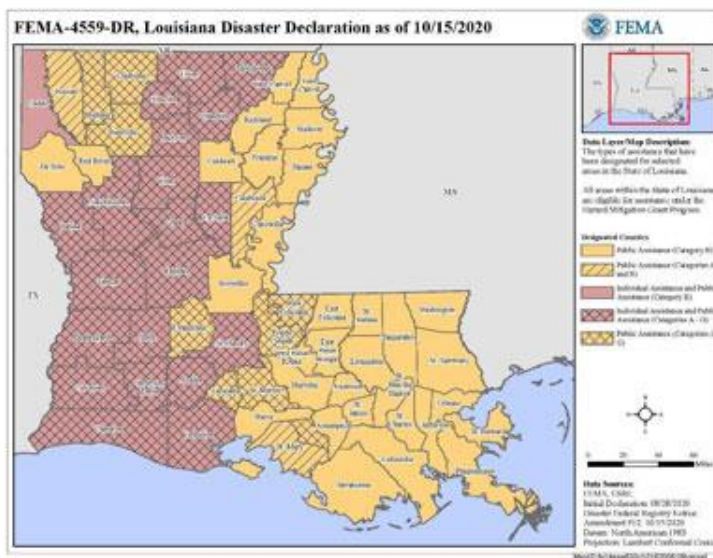
#### *Hurricane Laura (DR-4559)*

Hurricane Laura developed into a major Category 4 hurricane just hours before making landfall, despite its previous projection as a Category 2 storm. It had sustained winds of 150 miles per hour when it struck Cameron Parish on Thursday, August 27, 2020. Hurricane Laura is the strongest storm to make landfall in Louisiana recorded history and is the fifth strongest storm at landfall in the United States. Hurricane Laura brought a significant storm surge to Cameron Parish and maintained major hurricane strength as it brought catastrophic destruction to numerous parishes. Because of its speed, it maintained hurricane strength as it traveled through Louisiana’s northern parishes before eventually exiting Louisiana and entering Arkansas with tropical-storm-force winds. According to the Louisiana Department of Health, Hurricane Laura led to a total of 31 storm-related deaths.



Source: [https://www.nhc.noaa.gov/archive/2020/LAURA\\_graphics.php?product=5day\\_cone\\_with\\_line](https://www.nhc.noaa.gov/archive/2020/LAURA_graphics.php?product=5day_cone_with_line)

Twenty-one Louisiana parishes were declared eligible for FEMA Individual Assistance in response to Hurricane Laura: Acadia, Allen, Beauregard, Caddo, Calcasieu, Cameron, Grant, Jackson, Jefferson Davis, La Salle, Lincoln, Morehouse, Natchitoches, Ouachita, Rapides, Sabine, St. Landry, Union, Vermilion, Vernon, and Winn.



Source: [https://gis.fema.gov/maps/dec\\_4559.pdf](https://gis.fema.gov/maps/dec_4559.pdf)



By August 28, 2020, the Louisiana Public Service Commission reported over 500,000 residents were without power and the Louisiana Department of Health reported that 82 separate water systems throughout 24 parishes were completely compromised and unable to provide water to hundreds of thousands of citizens. The majority of water systems throughout Calcasieu Parish were either on a boil water advisory or completely incapable of providing water. St. Mary Parish experienced salt-water intrusion that rendered their water unfit for consumption, and the parish had to buy water to bring to its citizens. Beauregard Parish reported 100 percent power outages, compromised water, and sewer systems that deprived thousands of citizens of water and basic sanitation needs. Beauregard Parish responded to numerous reports of citizens trapped in their homes. State and local assets were provided to assist the parish with its Search and Rescue missions and to clear roads that were blocked by fallen trees, power lines, and other debris.

The City of Lake Charles in Calcasieu Parish experienced unprecedented winds that tore apart numerous structures in and around the city. The Isle of Capri Casino, a floating casino, became unmoored, floated to the I-10 bridge, and became wedged under the bridge. A fire began at a nearby chlorine plant, releasing dangerous fumes to the surrounding area.

Congregate shelters for survivors are not utilized for long-term sheltering in order to mitigate the spread of COVID-19. To provide non-congregate sheltering in the COVID-19 environment, the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) immediately contracted with hotels around the state to provide over 1,500 rooms for nearly 3,500 survivors from southwest Louisiana. Ultimately, over 21,000 survivors from Hurricane Laura evacuated and were sheltered in non-congregate shelters.

Currently, the impacted areas are facing workforce challenges and the potential for a sustained mass exodus of the population as residents seek out available housing options across Louisiana and oftentimes, out of state. Thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane impacts. Some units cannot be repaired, and many communities risk being overcome by blight.

As recovery efforts continue throughout the impacted areas, lack of preparation for housing needs has left many essential workers with no place to stay post-disaster. With strains on the workforce, the region's importance as an energy hub to the entire nation also risks increased costs felt across the country. Further, as roughly half of the housing stock in the area was damaged, and the demand for both permanent and temporary housing increases due to significant loss of units, the cost of housing continues to increase for residents.

#### *Hurricane Delta (DR-4570)*

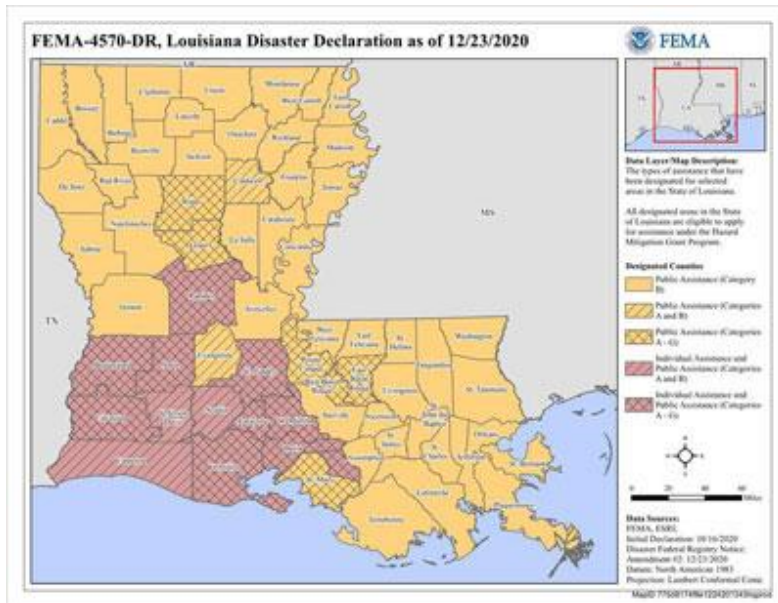
Hurricane Delta made landfall approximately six weeks after, and just 13 miles, from where Hurricane Laura struck and followed a similar path, devastating many of the same communities again. Hurricane Delta made

landfall in Louisiana on Friday, October 9, 2020, as a strong Category 2 hurricane. Outer bands from Hurricane Delta began impacting Louisiana almost 24 hours before landfall, bringing significant amounts of rainfall during the evening of October 8, 2020. When Hurricane Delta struck Louisiana, it brought high storm surge, heavy rain, and damaging winds. Parts of Calcasieu Parish had already received 16-17 inches of rain by the time Hurricane Delta made landfall. According to the Louisiana Department of Health, Hurricane Delta led to a total of six storm-related deaths.



Source: [https://www.nhc.noaa.gov/archive/2020/DELTA\\_graphics.php?product=5day\\_cone\\_no\\_line](https://www.nhc.noaa.gov/archive/2020/DELTA_graphics.php?product=5day_cone_no_line)

Twelve Louisiana parishes were declared eligible for FEMA Individual Assistance in response to Hurricane Delta: Acadia, Allen, Beauregard, Calcasieu, Cameron, Iberia, Jefferson Davis, Lafayette, Rapides, St. Landry, St. Martin, and Vermilion. All of these parishes, with the exception of Iberia, Lafayette, and St. Martin, were also hit by Hurricane Laura.



Source: [https://gis.fema.gov/maps/dec\\_4570.pdf](https://gis.fema.gov/maps/dec_4570.pdf)

Although the citizens and local governments in southwest Louisiana had been working nonstop to conduct recovery operations after Hurricane Laura, there were still thousands of buildings that had not yet been repaired. Over 8,000 blue tarps could be seen on rooftops prior to Hurricane Delta's landfall, and piles of debris that had not yet been removed dotted the landscape. Survivors who were forced to evacuate for extended periods due to utility outages barely had time to evaluate their homes before once again being forced to evacuate ahead of Hurricane Delta. Further, many Hurricane Laura survivors found their buildings and residences were flooded by Hurricane Delta just six weeks after being damaged by Hurricane Laura's winds.

On October 10, 2020, the Louisiana Public Service Commission reported that over 688,000 Louisiana citizens were without power. Nearly all of the parishes in southwestern Louisiana and many in central and northern Louisiana received catastrophic damage from Hurricane Delta. Trees and power lines caused numerous road blockages. The Louisiana Department of Health reported that 71 water systems serving a population of over 32,000 were impacted and 74 Boil Water Advisories were in effect for over 220,000 survivors. Due to inaccessibility issues from flooding and road damages, full Preliminary Damage Assessments were not immediately feasible.

Louisiana agencies and their partners were able to return all but 8,000 Hurricane Laura survivors to their home parishes in the weeks after Hurricane Laura with approximately 6,000 spread across several Louisiana hotels and 2,000 in Texas hotels. Approximately 2,000 of the survivors that were able to return to their home parish were able to do so during the week prior to Hurricane Delta. As a result of Hurricane Delta, almost 1,000 additional survivors reported to Louisiana shelters. Survivors were staged in congregate settings while state and local governments assessed the conditions of their homes. Those with major damages were again sheltered in hotels.

The immediate mass exodus of the population seen from Hurricane Laura with the potential for significant impacts to the population and workforce was exacerbated by the continued devastation of Hurricane Delta. Thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane impacts. Some units cannot be repaired, and many communities risk being overcome by blight.

As recovery efforts continue throughout the impacted areas for both Hurricane Laura and Hurricane Delta, the lack of preparation for housing needs has left many essential workers with no place to stay post-disaster. With strains on the workforce, the region's importance as an energy hub to the entire nation also risks increased costs felt across the country. Further, as roughly half of the housing stock in the area was damaged, and the demand for both permanent and temporary housing increases due to significant loss of units, the cost of housing continues to increase for residents.

Since both storms hit the same general areas, 3,899 individual homes that were damaged in both Laura and Delta were counted only once in summary tables.

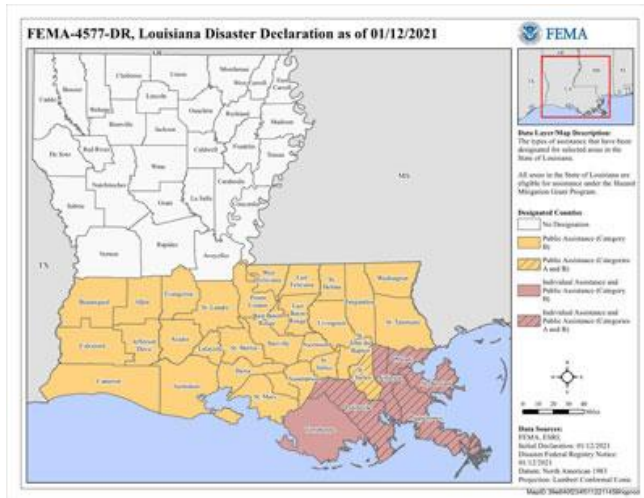
#### *Hurricane Zeta (DR-4577)*

During the ongoing fight against the COVID-19 pandemic, and just weeks after the devastation from Hurricanes Laura and Delta, Louisiana faced another dangerous storm as it began preparing for Hurricane Zeta on October 26, 2020.



Source: [https://www.nhc.noaa.gov/archive/2020/ZETA\\_graphics.php?product=5day\\_cone\\_with\\_line](https://www.nhc.noaa.gov/archive/2020/ZETA_graphics.php?product=5day_cone_with_line)

Six Louisiana parishes were declared eligible for FEMA Individual Assistance in response to Hurricane Zeta: Jefferson, Lafourche, Plaquemines, St. Bernard, St. Tammany, and Terrebonne



Source: <https://www.fema.gov/disaster/4577>

Hurricane Zeta, a major Category 3 hurricane with sustained winds of 115 mph, made landfall in Lafourche Parish on the evening of October 28, 2020. High wind gusts and local heavy rainfall impacted much of southeast Louisiana, causing major damage to private homes and forcing state and local governments to incur significant costs associated with saving lives and preserving public health and safety. On October 30, 2020, power outages reached a peak of 516,028. Additionally, several parishes reported major debris needed to be removed to make roads safe and passable. According to the Louisiana Department of Health, Hurricane Zeta caused one storm-related death.

In Jefferson Parish, the Town of Grand Isle sustained significant damage and reported three breaches in the Burrito Levee. An apartment complex in Terrytown collapsed and resulted in the displacement of at least 25 individuals from their homes.

In Lafourche Parish, low water pressure caused by power failure triggered a boil water advisory for much of the parish. Major highways and roads were closed due to downed power lines and utility poles and debris on roadways.

Many residents of Terrebonne Parish were forced to evacuate ahead of Hurricane Zeta and saw widespread power outages due to downed power lines, utility poles, and trees. Emergency response teams conducted search and rescue during the storm, retrieving two people whose roof blew off their homes.

As thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane impacts, Louisiana faced damages that now extended across the state. After Hurricane Zeta, even more communities face the risk of being overcome by blight. Further, the demand for both permanent and temporary housing only amplified across Louisiana due to significant loss of units as the cost of housing continues to increase for residents.

## 2021 STORMS

Louisiana was impacted by three major disasters in 2021 – Severe Winter Storms (DR-4590), Severe Storms, Tornadoes, and Flooding (DR-4606), and Hurricane Ida (DR-4611). Combined these storms resulted in 49 of Louisiana’s 64 parishes receiving a disaster declaration for FEMA IA.

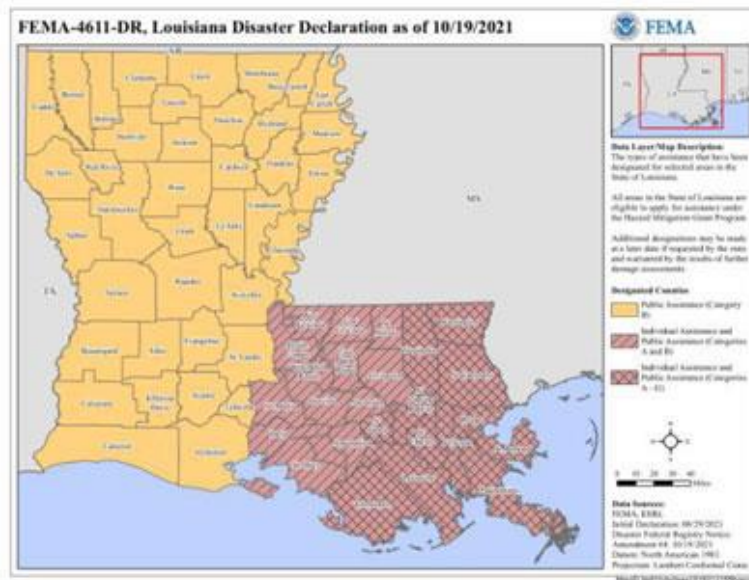
### *Hurricane Ida (DR-4611)*

Hurricane Ida made landfall in Lafourche Parish on August 29, 2021, just shy of a Category 5 storm with sustained winds of 150 mph. Hurricane Ida is tied with Hurricane Laura in 2020 as the strongest hurricane to strike Louisiana. Terrebonne and Lafourche parishes were particularly hard hit along with St. John, St. James, St. Charles, and large portions of lower Jefferson.



Source: [https://www.nhc.noaa.gov/archive/2021/IDA\\_graphics.php?product=5day\\_cone\\_with\\_line](https://www.nhc.noaa.gov/archive/2021/IDA_graphics.php?product=5day_cone_with_line)

Twenty-five parishes were declared eligible for FEMA Individual Assistance in response to Hurricane Ida: Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana.



Source: <https://www.fema.gov/disaster/4611>

Wind gusts of 172 mph were measured near landfall at Port Fourchon, and Hurricane Ida remained a major hurricane, above a Category 3, for nine hours after making landfall. Some areas saw 17 inches of rain during the storm, causing localized flooding across southeast Louisiana. Sustained high winds, storm surge, and heavy rainfall impacted much of southeast Louisiana, causing major damage to private homes and forcing state and local governments to incur significant costs associated with saving lives and preserving public health and safety.

Over 900,000 residents in Louisiana were without power following Hurricane Ida, some for over a month. According to Entergy, the storm damaged or destroyed more than 22,000 power poles, 26,000 spans of wire, and 5,261 transformers. Hurricane Ida accounted for more electric poles damaged or destroyed than by Hurricanes Laura, Delta, and Zeta combined.

## SUMMARY

Louisiana residents across the state are looking to rebuild and recover after six different federally declared disasters occurred in just two years amidst an ongoing pandemic. In total, 60 out of the 64 parishes were impacted by at least one of the disasters of 2020 and 2021. From Hurricanes Laura, Delta, Zeta, and Ida, 100,778 homeowners sustained wind damage, an estimated 75 percent without homeowners' insurance.

The state immediately began citizen engagement efforts following the 2020 disasters to gather data regarding impacts and unmet needs, beginning with local officials and personnel in the impacted communities. Citizen engagement efforts remain ongoing through the public comment period to inform program design and keep a pulse on the outstanding unmet needs of Louisiana residents. The Louisiana Office of Community Development - Disaster Recovery Unit will lead a series of public meetings across the state, with in-person meetings held in the most impacted parishes. The state is taking measures to ensure all public hearings are recorded and made available to the public after each meeting. The state has also worked closely with local leaders and stakeholders to ensure Louisiana residents were made aware of this funding allocation and the opportunity to present feedback. Citizen engagement efforts include but are not limited to public hearings, social media outreach, earned media engagement, traditional marketing around the availability of the draft action plan for public review, and additional targeted outreach in the 15 FEMA-declared MID areas from Hurricanes Laura and Delta.

As Louisiana has received Community Development Block Grant Disaster Recovery (CDBG-DR) funding allocation under PL 117-43 for 2020 Hurricanes Laura and Delta, a critical function of assessing unmet needs comes from the four remaining federally declared disasters that have impacted the state in 2020 and 2021. To fulfill the requirements of this allocation, the state must submit an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs to the Department of Housing and Urban Development (HUD). Governor John Bel Edwards has designated the Louisiana Office of Community Development - Disaster Recovery Unit as the administering agency for these recovery funds. On behalf of the State of Louisiana, the Louisiana Office of Community Development - Disaster Recovery Unit has developed the following Action Plan to outline the proposed use of the CDBG-DR funds and eligible activities available to assist declared parishes to meet unmet housing, economic revitalization, infrastructure, planning, and other needs that have resulted from Hurricanes Laura and Delta.

Through this Action Plan, the state presents unmet need estimates from the 2020 storms and the additional needs that have arisen from subsequent 2021 disasters that have compounded total disaster related unmet needs across the state. Based on the Unmet Needs Assessment presented in this document, the state has calculated a total unmet need of **\$4,478,097,577** attributable to Hurricanes Laura, Delta, and Zeta and an additional **\$8,489,208,010** attributable to Hurricane Ida.

The state used best available data sources to perform these analyses. Detailed analyses of losses sustained and the resources already made available are informative as to the dollar thresholds associated with damage in housing, infrastructure, and economic revitalization. They also include numeric quantities associated with the demographic characteristics of the area of impact.



While the state is cognizant an award large enough to cover all unmet needs is not reasonable to expect as a result of these disasters, it does believe this unmet need total illustrates the unique nature of these disasters relative to those from which it has coordinated past long-term recovery activities. Specifically, Hurricane Laura's, Delta's, Zeta's and Ida's powerful winds cut across a swath of rural Louisiana, that while lacking in dense population centers provides essential drivers to Louisiana's economy – specifically in the agriculture and timber industries, for which this disaster was as catastrophic as any in the state's history. Still, given the intent of the CDBG program, the state will – as it has in the past – first prioritize housing recovery activities in effectuating its long-term recovery efforts.

The proposed allocation of funding described in this Action Plan includes activities for the administration and planning of recovery programs, housing, infrastructure, and economic revitalization. The housing programs proposed are wide ranging. They include:

- Options for rehabilitation and reconstruction of damaged owner-occupied homes;
- Construction or rehabilitation of affordable housing units;
- New construction or renovation of residential rental properties;
- Permanent supportive housing;
- Temporary rental assistance for rapid rehousing;
- Soft second mortgages for gap financing to support homeownership;
- Flood insurance payment assistance in conjunction with rehabilitation and reconstruction of owner-occupied homes; and
- Gap financing for LIHTC developments.

In addition, the state is implementing a Hazard Mitigation Grant Program, Nonfederal Share Match Program, and a Small Business Loan and Grant Program. The implementation of the proposed recovery programs will increase stability to residents and businesses alike through infrastructure and economic restoration, while prioritizing LMI households and MID areas.

The State of Louisiana will implement all programs and be responsible for the distribution of funds. Depending on a continued assessment of unmet needs, mitigation needs, and additional funding, the state may allocate funds to parishes or other subrecipients through future substantial Action Plan Amendments. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

## Proposed Allocation Amounts

The second allocation of \$450 million to be submitted as an amendment to the proposed action plan for Hurricanes Laura and Delta (originally \$600 million) upon receipt of the Federal Register Notice.

CATEGORY	PROGRAM ALLOCATION AMOUNT		
	ORIGINAL ALLOCATION	SECOND ALLOCATION	TOTAL BUDGET
Administration	\$23,900,000	\$18,000,000	\$41,900,000
Planning	\$100,000	\$0.00	\$100,000
Housing	\$385,798,226	\$336,780,518	\$722,578,744
Infrastructure	\$185,232,774	\$0.00	\$185,232,774
Economic Revitalization	\$5,100,000	\$95,355,482	\$100,455,482
Public Service	\$0.00	\$0.00	\$0.00
<b>Total</b>	<b>\$600,131,000</b>	<b>\$450,136,000</b>	<b>\$1,050,267,000</b>

### UNMET NEED AND PROPOSED ALLOCATION - 2020

CATEGORY	REMAINING UNMET NEED	% OF UNMET NEED	PROGRAM ALLOCATION AMOUNT	% OF PROGRAM ALLOCATION
Administration	\$26,100,000.00	1%	\$23,900,000.00	4%
Planning	\$0.00	0%	\$100,000.00	0%
Housing	\$163,850,531.00	7%	\$385,798,226.00	64%
Infrastructure	\$141,817,307.00	6%	\$185,232,774.00	31%
Economic Revitalization	\$2,012,787,344.00	86%	\$5,100,000.00	1%
Public Services	\$0.00	0%	\$0.00	0%
Mitigation	\$0.00	0%	\$0.00	0%
<b>Total</b>	<b>\$2,344,555,182.00</b>	<b>100%</b>	<b>\$600,131,000.00</b>	<b>100%</b>

Data Source(s): FEMA IA/PA Data, LA GOHSEP and LA LED Numbers do not include Agriculture/Timber

\*Allocation Amount includes project delivery costs and does not include administration and planning costs.

## UNMET NEED AND PROPOSED ALLOCATION - 2021

CATEGORY	REMAINING UNMET NEED	% OF UNMET NEED	PROGRAM ALLOCATION AMOUNT	% OF PROGRAM ALLOCATION
Administration	\$0.00	\$0.00	\$0.00	\$0.00
Planning	\$0.00	\$0.00	\$0.00	\$0.00
Housing	\$0.00	\$0.00	\$0.00	\$0.00
Infrastructure	\$0.00	\$0.00	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00	\$0.00	\$0.00
Public Services	\$0.00	\$0.00	\$0.00	\$0.00
Mitigation	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

Data Source(s): OCD

## 2. UNMET NEEDS ASSESSMENT

---

### OVERVIEW

In accordance with HUD guidance, the State of Louisiana completed the following unmet needs assessment to identify priorities for CDBG-DR funding allocated in response to impacts from Hurricanes Laura and Delta. This assessment will be updated as additional damage assessment information becomes available related to the 2021 storms.

The assessment below utilizes federal and state resources, including data provided by FEMA, HUD, and the Small Business Administration (SBA), among other sources, to estimate unmet needs in three main categories of damage: housing, economy, and infrastructure. HUD has identified the following areas as Most Impacted and Distressed (MID) from Hurricanes Laura and Delta: Acadia (70526, 70578), Allen, Beauregard, Caddo, Calcasieu, Cameron, Jefferson Davis, Lafayette, Natchitoches, Ouachita, Rapides (71302), St. Landry (70570), St. Martin (70517), Vermilion (70510), and Vernon (71446). Each of the specified areas had more than 1,000 housing units damaged in Hurricane Laura, Delta, Zeta, and Ida and collectively 96 percent of all damaged units are within these parishes. This unmet needs assessment focuses on statewide impacts, with specific sections detailing particular needs within the most impacted areas, and where relevant, smaller geographic units. Impacted parishes sustained damages due to severe storm flooding, wind, and excessive rainfall.

#### *Grantee-Identified MID Areas*

In addition to the 15 HUD-identified MID areas from Hurricanes Laura and Delta, the state has identified the following parishes as MID: Acadia, Allen, Grant, Iberia, Jackson, Jefferson Davis, Lafayette, La Salle, Lincoln, Morehouse, Natchitoches, Rapides, Sabine, St. Landry, St. Martin, Union, Vermilion, Vernon, and Winn.

The existing barriers to recovery efforts for Louisiana stem from multiple FEMA-declared disasters in a short time span, impacting residents who are struggling to rebuild in the time of a global pandemic. Housing units across Louisiana remain uninhabitable and communities are struggling to overcome the damages from not only storms that occurred weeks apart in 2020, but also from the strongest storm to ever hit the state in 2021.

As essential workers are spread thin with limited resources and housing, Louisiana residents are facing permanent and temporary housing shortages, blighted neighborhoods, soaring repair costs, and ultimate disaster fatigue as subsequent disasters have led to further destruction across the state.

Approximately 36 percent of the state's population is located within the 24 IA parishes affected by Hurricanes Laura and Delta. Of this total:

- 81 percent of the population residing in the 24 IA parishes is located within one of the 15 parishes identified by HUD as most impacted and distressed.
- It is important to note that the population residing within the 15 parishes identified as most impacted and distressed comprises roughly 29 percent of the state's total population.

Although the affected region tends to share similar demographic trends with the state as a whole, there are several key areas (education level and poverty indicators) in which the data differs. All data cited in this section is from the Census Bureau's 2019 five-year estimates from the American Community Survey (ACS).

- The 15 most impacted and distressed areas have a slightly larger proportion of households with a disability compared to the other IA parishes. By percentage, 39 percent of the households in the 15 most impacted parishes have a disability compared to 25 percent of the households with a disability in the other IA parishes.
- The 14 most impacted and distressed areas have a significantly lower proportion of population 25 and older with a bachelor's degree compared to the other IA parishes. By percentage, 7 percent of the population age 25 years or higher in the 15 most impacted parishes have a bachelor's degree compared to 24 percent of the population of same in the other IA parishes.

Housing demographics also highlight differences between the 24 IA parishes and the state as a whole.

- The median owner-occupied housing unit value for the 15 most impacted and distressed areas is \$124,850, which is \$38,250 and 23 percent lower than statewide.
- The median owner-occupied housing unit value for the 15 most impacted and distressed areas is \$118,650, which is \$44,450 and 27 percent lower than statewide.
- The 15 most impacted and distressed parishes also have a similar proportion of renters to owners as both the state and the other IA parishes.
- At 31 percent, the 15 most impacted and distressed parishes collectively are home to a renter population that is almost 6 percentage points lower than the other IA parishes (37 percent) and more than 2 percentage points higher than the statewide total (29 percent).

Income and poverty indicators across the affected area also deviate from statewide totals

- The 24 IA parishes have a median household income of \$42,950, which is \$6,519 and 13 percent less than the statewide median household income of \$49,469.
- In addition to a lower median household income, the 24 IA parishes have a per capita income that is significantly less (9 percent) than that of the state as a whole.

Damages in Calcasieu Parish far exceeded all other parishes. Calcasieu Parish sustained 59 percent of all properties damaged, 62 percent of all major-severe damaged properties, 69 percent of all flooded properties, and 39 percent of all destroyed properties resulting from the 2020 storms combined. Damages in Beauregard and Rapides parishes followed behind, both sustaining the next highest levels of impact and damaged properties.

### IMPACTS OF INSURANCE (HOI AND NFIP)

In conducting this analysis, the state has attempted to isolate owner-occupied households with evidence of flooding damage apart from those with no evidence of flooding damage. For the purposes of this analysis, in the absence of evidence of flood damage, units are assumed to be impacted exclusively by wind. As such, for the proportion of owner-occupied units with no evidence of flooding damage, the state is especially concerned about the high rate of households reported not to carry a standard hazard insurance policy that would otherwise be expected to offset documented losses. In total, 75 percent of the wind-impacted population is reported not to carry hazard insurance as shown in the table below.

### HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

	LAURA	% W/O HOI OR FLOOD INS	DELTA	% W/O HOI OR FLOOD INS	TOTAL
Wind Damage Only	14,939	75%	2,665	78%	17,604
Flood Damage	825	83%	688	76%	1,513
<b>Totals</b>	<b>15,764</b>		<b>3,353</b>		<b>19,117</b>

As outlined in Section 4. Proposed use of funds overview, the state has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities and increase resilience to climate impacts based on data collected in the unmet needs assessment and input from impacted communities and HUD-identified MID areas. Funding allocated for planning will be available to fund studies, analyses and additional planning efforts that may result in the establishment of additional recovery and resilience priorities and activities or support the design and implementation of the currently described CDBG-DR programs.

Unmet needs data reflects that the largest area of recovery need is for housing assistance followed by infrastructure and then economic revitalization. The largest portion of funding has been allocated to assist impacted homeowners and renters through programs that address disaster impacts and affordable housing, as these were the largest needs identified in the unmet needs assessment. Hurricanes Laura and Delta caused significant levels of damage to owner-occupied and rental housing within impacted parishes. The need for safe, decent, and affordable housing is the state's top priority, which is why the state has prioritized funding for housing.

Through the State’s existing LWI efforts and Restore outreach Efforts, the State has and will continue to engage with local municipalities, building officials, and floodplain management professionals in HUD-identified MIDs to increase the State’s awareness of existing local zoning regulations, procedural processes, and local land use conditions which affect the housing supply and MID areas. This meaningful information exchange between state and local government will continue to build awareness of necessary regulatory reforms that would be most effective in aligning housing supply with the vast housing needs across the state. Further, such interaction prepares MID communities to align their local zoning and building codes, and land use policies (to the extent possible) to potentially meet more restrictive federal requirements prior to rollout of new housing developments and programs.

## A. HOUSING UNMET NEED

### Disaster Damage and Impacts

As Louisiana was recovering from FEMA-declared damage to 56 out of 64 parishes as a result of the 2016 floods, the state's housing stock was still rebounding. These events left an indelible mark on Louisiana and have exposed new challenges to the state’s approach to flood risk reduction for all residents.

Louisiana is facing increased risk, in both magnitude and frequency, of flood events. This risk threatens our natural and built environment and our way of life. Specifically:

- Due to climate change, sea-level rise, and the threat of coastal land loss, the frequency, and intensity of tropical cyclones and severe thunderstorms have continued to increase.
- Both state and local hazard mitigation plans consistently demonstrate that the entire State of Louisiana is at severe flood risk and that the occurrence of future catastrophic flood events cannot be predicted solely by relying on the damage patterns of past events.

This difficulty is compounded when attempting to assemble future projections of risks because the state does not have the ability to accurately estimate the cost of long-term and repeated flood damage. As a result, wind- and flood-related damages have largely been underestimated.

### HOUSING

- Number of housing units damaged in 2020 storms: 40,388
- 19,117 homeowners
- 6,303 major-severe / 12,814 minor
- 11,893 LMI / 7,224 non-LMI
- 21,271 renters

- 7,857 major-severe / 13,414 minor
- 15,486 LMI / 5,785 non-LMI
- Number of properties damaged in both Hurricanes Laura and Delta: 3,899. These properties are only counted once in Hurricane Laura totals so as not to duplicate their totals in Hurricane Delta.
- There was no duplication of damaged properties between Hurricane Zeta and Hurricanes Laura & Delta because Hurricane Zeta was confined to the southeast portion of the state while Hurricanes Laura and Delta were in the southwest, west, central and northwest portions of the state.
- Parish with the majority of housing unit damages: Calcasieu (59 percent of all damages)
- Total number of individuals displaced to shelters: 19,337
- Number of homeowners with wind damage: 17,604 (75 percent without homeowner insurance)
- Number of homeowners with flood damage: 1,513 (80 percent without flood insurance)

## STATEWIDE HOUSING DAMAGE AND LOSS ASSESSMENT

The pre-flood housing stock was most concentrated in parishes located within a metropolitan area, with fewer housing units in surrounding rural parishes. Low levels of pre-disaster stock in rural areas are particularly relevant to survivors displaced from rural parishes needing to be rehoused within a reasonable commuting distance to maintain a connection to employment, health care, and school networks. This stands in contrast to survivors displaced from parishes located within the metro areas who would be in closer proximity to a larger housing market and may have greater access to permanent rehousing options.

As Hurricane Laura approached the Gulf Coast, the Office of Public and Indian Housing (PIH) closely monitored the area of potential effect (APE) to identify at-risk public housing authorities (PHAs). Using the counties and parishes identified with a Hurricane Warning, Tropical Storm Warning, Hurricane Watch, or Tropical Storm Watch as the APE, PIH identified 196 PHAs serving approximately 21,069 Public Housing families and 57,969 Housing Choice Voucher (HCV) families at-risk. With a large portion of the portfolio at-risk, the corresponding PIH Field Office provided all PHAs with steps to take to prepare for the storm and available resources. HUD pre-storm Multifamily Housing portfolio included in 517 properties throughout the state of Louisiana. The total number of units for these 517 properties includes 44,292 units of which 18,968 units were assisted. Of the 517 assisted properties, 257 were HUD insured, and of the total number of insured units, 9,087 were assisted units. The double impact of Laura and Delta rendered significant damage, which exasperated the problem of safe and affordable housing. It is necessary for the State to continue addressing these issues even though assistance was provided by FEMA and insurance. There remains substantial work to increase and improve safe, stronger and affordable housing to the most vulnerable and rural populations.



*Population, Poverty and Potentially Vulnerable Groups*

The following table presents demographic and disaster registrant information for the declared parishes impacted by both Hurricanes Laura and Delta. The populations range from the largest parish of Caddo with a population of 240,204 to the smallest parish being Cameron with a population of 6,973. As of November 2, 2020, 233,136 households in the 21 declared parishes have applied for FEMA IA assistance. Of these registrants, 116,199 (49.8%) were homeowners and 116,642 (50%) were renters.

**TABLE: POPULATION, POVERTY, AND POTENTIALLY VULNERABLE GROUPS**

PARISH	PRE-DISASTER			POST DISASTER OWNER DATA			POST DISASTER RENTER DATA			TENURE BLANK
	TOTAL POPULATION	% PEOPLE BELOW POVERTY LEVEL	POPULATION 60+	OWNER REGISTRANTS	OWNER HH WITH MEMBER 60+	OWNER WITH AFN MEMBER	RENTER REGISTRANTS	HH WITH MEMBER 60+	RENTER HH WITH AFN MEMBER	
Acadia	62,045	23.9%	20.0%	3,563	1,168	486	2,214	237	242	6
Allen	25,627	18.7%	19.6%	4,134	1,639	753	1,857	298	233	12
Beauregard	37,497	17.2%	21.2%	8,317	3,233	1,478	2,785	438	395	19
Caddo	240,204	23.3%	22.4%	926	297	146	1,789	106	180	1
Calcasieu	203,436	16.9%	20.3%	57,100	23,179	8,525	55,952	7,594	5,268	178
Cameron	6,973	10.3%	25.1%	3,303	1,240	393	1,508	190	98	12
Grant	22,389	19.7%	20.0%	2,536	1,037	475	667	100	100	3
Jackson	15,744	26.0%	25.7%	950	385	150	483	49	47	3
Jefferson Davis	31,368	19.4%	22.5%	5,724	2,113	862	2,798	439	348	9
La Salle	14,892	22.0%	23.5%	1,152	463	86	273	34	19	0
Lincoln	46,742	29.7%	17.8%	1,244	449	146	1,141	97	111	0
Morehouse	24,874	28.5%	24.2%	614	263	96	389	35	37	1
Natchitoches	38,158	33.5%	21.3%	2,773	1,083	430	1,833	225	222	6
Ouachita	153,279	23.9%	20.2%	4,372	1,643	652	4,185	448	498	4
Rapides	129,648	19.4%	21.5%	9,353	3,612	1,614	30,738	1,294	1,070	18
Sabine	23,884	19.5%	26.6%	2,232	870	407	646	79	84	4
St. Landry	82,124	28.7%	21.7%	1,058	316	201	1,118	92	113	4
Union	22,108	18.5%	27.4%	1,381	570	245	393	53	39	0
Vermilion	59,511	17.6%	20.3%	2,793	909	397	1,115	120	135	6

**TABLE: POPULATION, POVERTY, AND POTENTIALLY VULNERABLE GROUPS**

Vernon	47,429	17.2%	15.7%	5,603	2,133	1,090	4,139	427	481	7
Winn	13,904	23.8%	23.8%	1,439	644	261	619	104	97	2

*Source: Census Bureau 2018 Population Estimates: 2017 ADC 5-year data: FEMA IA Data (FIDA 21196)*

The State understands that wraparound public services and early opportunities for case management following a disaster are not only necessary to complement housing, infrastructure, and economic revitalization activities – but are critical in a hurricane fatigued state, especially amid a global pandemic. As of August 2021, FEMA had obligated more than \$41 million for Hurricane Laura/Delta Crisis Counseling, Disaster Case Management, Disaster Legal Services and Disaster Unemployment Assistance. To ensure that the state is minimizing duplicative funding for wraparound services and leveraging the existing partnerships, the state intends to continue direct coordination with GOHSEP’s Disaster Case Management (DCM) Program through continued joint outreach efforts and education about the proposed CDBG-DR programs as potential resources to survivors in impacted areas.

DCMs assist in managing the depth and complexity of needs that have been identified because of the disaster(s), and work with survivor households to develop individualized recovery plans and are responsible for verifying unmet needs, advocating for resources and educating individuals and families on available resources and connecting them to the appropriate resource. The State will leverage the existing DCM program to effectively reach vulnerable, underserved, and minority communities who often do not intentionally seek out the State or Federal government for assistance and will likely be better served by community agents they have pre-existing relationships with and trust.

Through the existing state-administered DCM program, case managers are provided with ongoing training opportunities based on the developing needs of the community which are focused on refining assessment and recovery planning skills, working with vulnerable populations (including those with access and functional needs), identifying mental health needs, legal assistance for heir properties, resource development, interfacing with Long-Term Recovery Groups (LTRGs) and state and locally administered programs such as the Restore Homeowner Assistance Program. Continued opportunities for joint citizen engagement amongst state-administered programs will help to identify critical public service needs that remain, and highlight areas where continued coordination is necessary to further minimize the unmet need.

The state compiled information to document damages across several different population stratifications, including owner-occupied and renter households, households with flood damage without flood insurance, households with wind damage without hazard insurance, households within the 15 most impacted and distressed areas, and low- and moderate-income (LMI) households. For the purposes of this analysis, the state used full applicant-level data

collected through FEMA's IA program. Datasets for Laura and Delta are as of April 2021. Unless otherwise noted, all housing summary data were compiled from these datasets.

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 "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.

To calculate the level of damage for **rental** households, the state used the following criteria:

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage
- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or more than one foot of flooding on the first floor.
- **Major-High:** \$3,500 to \$7,499 of FEMA inspected personal property damage or four to six feet of flooding on the first floor.
- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or six or more feet of flooding on the first floor.

Unless otherwise noted, the state has defaulted to HUD's definitions 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.

To calculate the level of damage for **owner-occupied** households, the state used the following criteria:

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

The average cost for full home repair to code for a specific disaster within each of the damage categories noted above is calculated using the observed differences in real property damage costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA after Hurricanes Laura and Delta.

Since SBA inspects for full repair costs, it presumes to reflect the full cost to repair the home, which is generally more than FEMA estimates on the cost to make the home habitable.

For each household determined to have unmet housing needs, their estimated average unmet housing need was calculated as factors which can be found in the tables below. These FEMA/SBA Multipliers below provide a summary of real property verified losses for homeowners inspected through both FEMA IA and SBA Disaster Loan programs. The multipliers listed represent a baseline for how the state calculated unmet housing needs.

Additionally, the state intends to use real-time unmet needs assessments gathered through its own program intake and inspection process to further inform this analysis over time. Numbers of individual housing units were counted only once across all storms.

#### **FEMA/SBA MULTIPLIER – LAURA**

CATEGORY	COUNT	FVL	SBA	MULTIPLIER
Severe	115	\$6,008,440	\$18,662,776	3.1
Major-High	86	\$1,841,903	\$14,580,286	7.9
Major-Low	867	\$11,257,017	\$98,674,106	8.8
Minor-High	895	\$5,656,689	\$66,321,795	11.7
Minor-Low	743	\$1,865,834	\$39,952,219	21.4
<b>Totals</b>	<b>2,706</b>	<b>\$26,629,883</b>	<b>\$238,191,182</b>	

#### **FEMA/SBA MULTIPLIER – DELTA**

CATEGORY	COUNT	FVL	SBA	MULTIPLIER
Severe	7	\$259,621	\$718,149	2.8
Major-High	19	\$374,415	\$2,175,000	5.8
Major-Low	113	\$1,308,204	\$11,803,419	9.0
Minor-High	77	\$466,943	\$4,586,075	9.8
Minor-Low	124	\$288,283	\$6,512,059	22.6
<b>Totals</b>	<b>340</b>	<b>\$2,697,466.00</b>	<b>\$25,794,702.00</b>	

**Destroyed Properties:** The state highlights the below parishes, based on their high concentration of properties reported to be ‘destroyed’ in the disaster events. The table below illustrates how Calcasieu and Cameron parishes

compare in destroyed homes against the remaining IA parishes in total. Of the 506 destroyed properties, the majority (93 percent) are home-owned properties.

**TABLE: DESTROYED PROPERTIES – LAURA, DELTA**

PARISH	LAURA (21 IA PARISHES)		DELTA (12 IA PARISHES)		TOTAL OVER ALL STORMS	
	COUNT	% OF TOTAL	COUNT	% OF TOTAL	COUNT	% OF TOTAL
Calcasieu	208	45%	12	30%	220	43%
Cameron	160	3%	10	25%	170	34%
Remaining IA Parishes	98	21%	18	45%	116	23%
<b>Total</b>	<b>466</b>		<b>40</b>		<b>506</b>	

After any catastrophic event, and throughout the recovery process, the most vulnerable populations with the greatest need can be particularly difficult to reach. The state will implement a multi-pronged, tailored approach using both traditional and untraditional methods of outreach to ensure that we engage and serve those who might be underserved or considered most vulnerable.

For the Restore Louisiana Homeowner Assistance Program, the state will target the Major/Severe population, upon which the federal allocation is based, to ensure all individuals potentially eligible for assistance are made aware of the grant funding. Outreach includes direct mail, text services, and email distribution, as well as onsite program popup centers and grassroots engagement throughout affected communities. The state intends to also engage and work alongside community leaders and representatives to identify the best methods of outreach for a respective neighborhood, city, or parish, and to further promote community resilience.

Additionally, OCD intends to coordinate statewide and local outreach initiatives to spread awareness and share information about the homeowner and rental assistance programs to direct those in need toward available assistance. This involves regular engagement with stakeholder group and state agencies, such as the Louisiana Department of Children & Family Services; setting up hubs across the state for area residents; hosting statewide webinars and local outreach meetings and events; and providing information to 211, which is the statewide telephone number that connects callers to information about critical health and human services available in their community including physical, mental health, disability and employment resources. Along with working with state agencies and stakeholder groups, OCD will look to trauma and abuse centers, rehabilitation facilities, and homeless shelters to be sure different segments of the state’s vulnerable population are served.

Working closely with stakeholder groups and agencies providing rehabilitation care to Louisiana residents, the state intends to connect those in need with available transitional housing and permanent supportive housing program resources.

### AFFORDABLE HOUSING PROGRAM REQUIREMENTS

The Action Plan provides for several affordable rental programs. The requirements of these programs are in addition to the requirements of other funding sources for each project (such as LIHTC credits allocated through the Louisiana Housing Corporation). In connection with those programs, generally "Affordable Rents" for LMI tenants by requiring grantees, subrecipients, or borrowers (as applicable) to adhere to the following affordable rent requirements:

- The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HUD HOME rent limits will include average occupancy per unit and adjusted income assumptions whichever is lower.

### INCOME REQUIREMENTS

The programs may require a "mixed-income" model, in which at least 51 percent of the units may be rented to LMI households, and no more than 49 percent of the units may be rented to above LMI households, at unrestricted market-rate rents (without imposing any income limit requirement for unrestricted units). However, program policies may provide for certain levels of restricted rents (but greater than the above "Affordable Rents" requirement) for non-LMI households based on AMI levels (i.e., households between 80 and 100 AMI). For LMI reserved units, the program policies may provide for percentages of units based on AMI (i.e., households at or below 50 percent AMI).

The periods of affordability for various programs are noted in the program descriptions in this Action Plan. Minimum periods of affordability will be adhered to as required by the Notice.

## 1. Single-Family v. Multi-Family; Owner Occupied v. Tenant

### FEMA IA OWNER OCCUPIED

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Acadia	4,434.00	1,643.00	1,287.00	880.00	\$7,495,265.00	\$5,824.00
Allen	4,575.00	1,675.00	1,384.00	961.00	\$8,914,740.00	\$6,441.00
Beauregard	9,103.00	3,132.00	2,674.00	2,006.00	\$16,931,313.00	\$6,332.00
Caddo	1,440.00	579.00	422.00	283.00	\$2,954,913.00	\$7,002.00
Calcasieu	59,133.00	19,825.00	16,661.00	10,783.00	\$140,422,484.00	\$8,428.00
Cameron	3,449.00	1,731.00	1,458.00	1,020.00	\$27,887,729.00	\$19,127.00
Grant	2,594.00	712.00	597.00	430.00	\$4,392,473.00	\$7,358.00
Iberia	935.00	585.00	491.00	416.00	\$2,185,784.00	\$4,452.00
Jackson	945.00	172.00	117.00	90.00	\$871,453.00	\$7,448.00
Jefferson Davis	6,091.00	1,892.00	1,550.00	1,053.00	\$10,808,877.00	\$6,973.00
La Salle	1,166.00	118.00	83.00	57.00	\$422,475.00	\$5,090.00
Lafayette	2,978.00	1,066.00	883.00	650.00	\$3,999,885.00	\$4,530.00
Lincoln	1,291.00	259.00	189.00	115.00	\$1,332,804.00	\$7,052.00
Morehouse	713.00	266.00	221.00	162.00	\$1,515,782.00	\$6,859.00
Natchitoches	2,864.00	617.00	448.00	290.00	\$2,622,338.00	\$5,853.00
Ouachita	4,564.00	953.00	725.00	541.00	\$4,298,467.00	\$5,929.00
Rapides	10,571.00	2,762.00	2,160.00	1,514.00	\$14,376,109.00	\$6,656.00
Sabine	2,285.00	440.00	327.00	229.00	\$1,854,902.00	\$5,672.00
St. Landry	2,982.00	1,234.00	1,019.00	738.00	\$5,003,878.00	\$4,911.00
St. Martin	1,279.00	623.00	536.00	407.00	\$2,323,967.00	\$4,336.00
Union	1,428.00	272.00	203.00	156.00	\$987,965.00	\$4,867.00
Vermilion	3,418.00	1,358.00	1,110.00	815.00	\$6,227,582.00	\$5,610.00
Vernon	5,684.00	1,343.00	1,039.00	714.00	\$5,975,335.00	\$5,751.00
Winn	1,464.00	338.00	253.00	168.00	\$1,525,535.00	\$6,030.00



COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
<b>Total</b>	<b>135,386.00</b>	<b>43,595.00</b>	<b>35,837.00</b>	<b>24,478.00</b>	<b>\$275,332,055.00</b>	<b>\$158,531.00</b>

Data Source(s): FEMA IA Data

### FEMA IA TENANTS APPLICANTS

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Acadia	2,734.00	1,200.00	835.00	464.00	\$1,282,444.00	\$1,536.00
Allen	2,092.00	917.00	465.00	378.00	\$780,781.00	\$1,679.00
Beauregard	3,071.00	1,568.00	763.00	739.00	\$1,197,422.00	\$1,569.00
Caddo	3,745.00	1,637.00	1,247.00	853.00	\$2,621,760.00	\$2,102.00
Calcasieu	57,887.00	39,267.00	24,686.00	20,374.00	\$49,094,990.00	\$1,989.00
Cameron	1,547.00	800.00	452.00	310.00	\$1,370,756.00	\$3,033.00
Grant	702.00	224.00	113.00	83.00	\$245,720.00	\$2,175.00
Iberia	395.00	140.00	101.00	56.00	\$192,750.00	\$1,908.00
Jackson	441.00	98.00	42.00	25.00	\$73,263.00	\$1,744.00
Jefferson Davis	2,933.00	1,313.00	779.00	457.00	\$1,315,699.00	\$1,689.00
La Salle	284.00	51.00	19.00	13.00	\$32,031.00	\$1,686.00
Lafayette	2,419.00	913.00	739.00	482.00	\$1,142,154.00	\$1,546.00
Lincoln	1,188.00	258.00	136.00	74.00	\$205,964.00	\$1,514.00
Morehouse	602.00	196.00	138.00	96.00	\$290,341.00	\$2,104.00
Natchitoches	1,940.00	641.00	379.00	202.00	\$874,644.00	\$2,308.00
Ouachita	4,917.00	1,496.00	967.00	608.00	\$1,848,927.00	\$1,912.00
Rapides	33,409.00	4,293.00	2,590.00	1,192.00	\$5,399,205.00	\$2,085.00
Sabine	672.00	171.00	96.00	60.00	\$184,801.00	\$1,925.00
St. Landry	2,349.00	1,151.00	886.00	462.00	\$1,706,026.00	\$1,926.00
St. Martin	472.00	226.00	189.00	123.00	\$260,427.00	\$1,378.00
Union	438.00	111.00	70.00	40.00	\$194,539.00	\$2,779.00





COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Vermilion	1,302.00	521.00	322.00	194.00	\$528,984.00	\$1,643.00
Vernon	4,299.00	1,234.00	582.00	409.00	\$919,346.00	\$1,580.00
Winn	639.00	203.00	116.00	70.00	\$186,172.00	\$1,605.00
<b>Total</b>	<b>130,477.00</b>	<b>58,629.00</b>	<b>36,712.00</b>	<b>27,764.00</b>	<b>\$71,949,146.00</b>	<b>\$45,415.00</b>

Data Source(s): FEMA IA Data

### FEMA IA APPLICATIONS BY HOUSING TYPE

RESIDENCE TYPE	# OF APPLICANTS	% OWNER OCCUPIED	% TENANTS	% UNKNOWN	% TYPE
Apartment	53,663.00	0%	19%	0%	19%
Assisted Living Facility	336.00	0%	0%	0%	0%
Boat	55.00	0%	0%	0%	0%
College Dorm	112.00	0%	0%	0%	0%
Condo	645.00	0%	0%	0%	0%
Correctional Facility	14.00	0%	0%	0%	0%
House/Duplex	156,368.00	36%	21%	0%	57%
Military Housing	832.00	0%	0%	0%	0%
Mobile Home	50,052.00	13%	5%	0%	18%
Other	7,567.00	1%	1%	0%	3%
Townhouse	2,877.00	0%	1%	0%	1%
Travel Trailer	3,992.00	1%	0%	0%	1%
Unknown	3.00	0%	0%	0%	0%
<b>Total</b>	<b>276,516.00</b>	<b>51%</b>	<b>47%</b>	<b>0%</b>	<b>99%</b>

Data Source(s): FEMA IA Data

### FEMA REAL PROPERTY DAMAGE OWNER OCCUPIED UNITS

COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
Acadia	251.00	202.00	110.00	9.00	7.00
Allen	255.00	249.00	165.00	13.00	8.00



COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
Beauregard	606.00	465.00	353.00	36.00	22.00
Caddo	60.00	120.00	72.00	8.00	4.00
Calcasieu	2,575.00	3,128.00	2,937.00	362.00	199.00
Cameron	92.00	164.00	270.00	93.00	179.00
Grant	111.00	85.00	89.00	5.00	11.00
Iberia	143.00	95.00	38.00	3.00	0.00
Jackson	31.00	17.00	15.00	1.00	3.00
Jefferson Davis	274.00	259.00	192.00	25.00	10.00
La Salle	17.00	14.00	2.00	0.00	0.00
Lafayette	247.00	136.00	63.00	5.00	4.00
Lincoln	32.00	27.00	25.00	4.00	0.00
Morehouse	45.00	50.00	27.00	2.00	1.00
Natchitoches	114.00	66.00	45.00	4.00	3.00
Ouachita	167.00	133.00	68.00	4.00	8.00
Rapides	410.00	346.00	279.00	21.00	19.00
Sabine	87.00	46.00	15.00	4.00	2.00
St. Landry	245.00	180.00	82.00	9.00	1.00
St. Martin	155.00	98.00	28.00	4.00	4.00
Union	59.00	37.00	30.00	0.00	1.00
Vermilion	233.00	187.00	107.00	9.00	8.00
Vernon	258.00	154.00	122.00	7.00	12.00
Winn	52.00	37.00	30.00	3.00	2.00
<b>Total</b>	<b>6,519.00</b>	<b>6,295.00</b>	<b>5,164.00</b>	<b>631.00</b>	<b>508.00</b>

Data Source(s): FEMA IA Data

The monetary thresholds are defined in Appendix D.



**FEMA REAL PROPERTY DAMAGE RENTAL UNITS**

COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
Acadia	173.00	122.00	106.00	22.00	3.00
Allen	102.00	63.00	87.00	9.00	5.00
Beauregard	239.00	130.00	89.00	30.00	5.00
Caddo	262.00	235.00	254.00	67.00	24.00
Calcasieu	5,620.00	3,685.00	4,031.00	1,042.00	273.00
Cameron	47.00	60.00	82.00	43.00	37.00
Grant	18.00	16.00	21.00	10.00	0.00
Iberia	18.00	13.00	12.00	6.00	1.00
Jackson	14.00	4.00	5.00	1.00	1.00
Jefferson Davis	141.00	113.00	100.00	33.00	7.00
La Salle	5.00	1.00	5.00	0.00	0.00
Lafayette	200.00	122.00	122.00	25.00	6.00
Lincoln	26.00	23.00	16.00	1.00	0.00
Morehouse	22.00	28.00	21.00	4.00	3.00
Natchitoches	58.00	31.00	67.00	18.00	5.00
Ouachita	168.00	171.00	189.00	40.00	6.00
Rapides	390.00	334.00	391.00	105.00	22.00
Sabine	18.00	11.00	19.00	3.00	0.00
St. Landry	173.00	98.00	128.00	40.00	13.00
St. Martin	55.00	39.00	24.00	2.00	1.00
Union	14.00	5.00	10.00	3.00	3.00
Vermilion	66.00	36.00	47.00	11.00	4.00
Vernon	141.00	66.00	67.00	12.00	2.00
Winn	24.00	14.00	11.00	5.00	0.00
<b>Total</b>	<b>7,994.00</b>	<b>5,420.00</b>	<b>5,904.00</b>	<b>1,532.00</b>	<b>421.00</b>

Data Source(s): FEMA IA Data

*FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.*

## 2. Public Housing and Affordable Housing

The catastrophic winds and torrential rain of Hurricane Laura, followed closely by Hurricane Delta, directly impacted several public housing developments in 15 of the most impacted parishes - Acadia, Allen, Beauregard, Caddo, Calcasieu, Cameron, Jefferson Davis, Lafayette, Natchitoches, Ouachita, Rapides, St. Landry, Vermilion, and Vernon - primarily in southwestern Louisiana. This included damage to 40 public housing authorities (PHAs) as a result of Hurricane Laura and one public housing authority in Rayville, located in Richland Parish, as a result of Hurricane Delta. Richland Parish was not presidentially declared as an affected parish; however, the agency was severely affected. Hurricane Zeta did not have a significant impact on PHAs in Jefferson, Lafourche, Plaquemines, St. Bernard, St. Tammany, and Terrebonne parishes.

The effects of Hurricanes Laura and Delta caused more than 2,000 public housing assisted families to seek temporary housing assistance through FEMA, American Red Cross, and with family and/or friends. Families are now faced with relocation within the assisted agency/jurisdiction, outside due to the lack of habitable vacant units, re-issuance of Housing Choice Vouchers or seeking voucher assistance with other agencies with disaster preferences. HUD Public Housing has assisted families with the transfer of assistance exercising portability, encouraged PHAs to develop disaster preference policies, and is collecting information on unit availability within Louisiana to provide to families.

### MULTIFAMILY ASSISTED HOUSING - 2020

TYPE OF DAMAGE	# OF PROPERTIES	# OF UNITS	# OF UNITS ASSISTED	# OF UNITS WAITING ASSISTANCE	REMAINING UNMET NEED
Minor-Low	0.00	0.00	0.00	0.00	0.00
Minor-High	36.00	2,697.00	941.00	1,756.00	0.00
Major-Low	14.00	1,263.00	353.00	910.00	0.00
Major-High	0.00	0.00	0.00	0.00	0.00
Severe	15.00	1,537.00	752.00	785.00	0.00
<b>Total</b>	<b>65.00</b>	<b>5,497.00</b>	<b>2,046.00</b>	<b>3,451.00</b>	<b>0.00</b>

*Data Source(s): HUD Final Draft Housing Impact Assessment*

*FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.*



### MULTIFAMILY ASSISTED HOUSING - 2021

TYPE OF DAMAGE	# OF PROPERTIES	# OF UNITS	# OF UNITS ASSISTED	# OF UNITS WAITING ASSISTANCE	REMAINING UNMET NEED
Minor-Low	0.00	0.00	0.00	0.00	0.00
Minor-High	0.00	0.00	0.00	0.00	0.00
Major-Low	0.00	0.00	0.00	0.00	0.00
Major-High	0.00	0.00	0.00	0.00	0.00
Severe	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Data Source(s): OCD

### PUBLIC HOUSING AUTHORITIES DAMAGED - 2020

COUNTY	TOTAL # PHAS	TOTAL PHAS DAMAGED	# OF UNITS DAMAGED	REMAINING UNMET NEED
All FEMA IA	63.00	17.00	1,046.00	0.00
<b>Total</b>	<b>63.00</b>	<b>17.00</b>	<b>1,046.00</b>	<b>0.00</b>

Data Source(s): HUD Exchange

### PUBLIC HOUSING AUTHORITIES DAMAGED - 2021

COUNTY	TOTAL # PHAS	TOTAL PHAS DAMAGED	# OF UNITS DAMAGED	REMAINING UNMET NEED
All FEMA IA	0.00	0.00	0.00	0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Data Source(s): OCD

### OWNER WITH UNMET NEED IN A FLOODPLAIN

INCOME CATEGORY	COUNT	# WITHOUT FLOOD INSURANCE	% WITHOUT FLOOD INSURANCE
LMI	2,521.00	2,233.00	89%
Non-LMI	1,098.00	627.00	57%
Unknown	621.00	485.00	78%
<b>Total</b>	<b>4,240.00</b>	<b>3,345.00</b>	

Data Source(s): FEMA IA Data

## INSURANCE CLAIMS AND LOSSES IN DISASTER IMPACTED AREAS

COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES (\$)
Acadia	7,009.00	4,740.00	\$67,396,341.00
Allen	4,669.00	3,168.00	\$101,159,812.00
Beauregard	13,337.00	9,871.00	\$289,264,431.00
Caddo	3,500.00	1,739.00	\$18,563,131.00
Calcasieu	109,622.00	74,991.00	\$5,389,945,848.00
Cameron	1,861.00	1,193.00	\$166,659,827.00
Grant	2,900.00	2,068.00	\$28,531,663.00
Iberia	2,885.00	1,860.00	\$19,095,982.00
Jackson	1,199.00	704.00	\$6,926,505.00
Jefferson Davis	7,274.00	5,036.00	\$120,168,365.00
La Salle	863.00	555.00	\$5,383,382.00
Lafayette	19,288.00	11,839.00	\$172,933,095.00
Lincoln	1,848.00	1,068.00	\$12,911,806.00
Morehouse	1,437.00	907.00	\$13,557,565.00
Natchitoches	2,622.00	1,605.00	\$20,234,522.00
Ouachita	10,817.00	6,152.00	\$81,347,159.00
Rapides	18,156.00	11,526.00	\$175,428,783.00
Sabine	1,696.00	1,182.00	\$14,666,470.00
St. Landry	6,276.00	4,299.00	\$46,602,717.00
St. Martin	2,292.00	1,469.00	\$14,534,567.00
Union	1,136.00	693.00	\$6,969,343.00
Vermilion	6,309.00	4,500.00	\$61,474,495.00
Vernon	8,964.00	6,678.00	\$112,370,693.00
Winn	1,515.00	947.00	\$17,770,520.00
<b>Total</b>	<b>237,475.00</b>	<b>158,790.00</b>	<b>\$6,963,897,022.00</b>

Data Source(s): Louisiana Department of Insurance

## TOTAL HOME LOANS APPROVED BY SBA

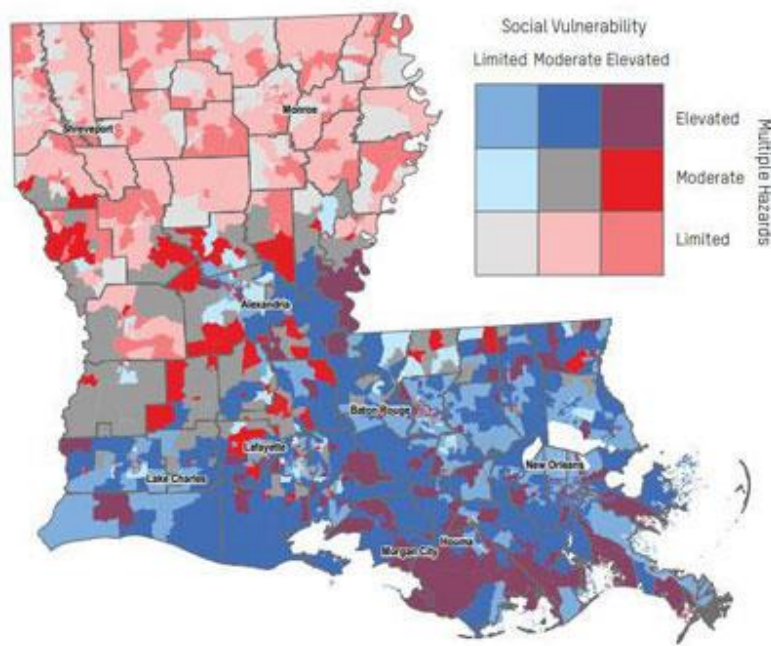
COUNTY	# OF HOME LOANS
Acadia	74.00
Allen	123.00
Beauregard	196.00
Caddo	99.00
Calcasieu	3,888.00
Cameron	192.00
Grant	69.00
Iberia	2.00
Jackson	22.00
Jefferson Davis	166.00
La Salle	102.00
Lafayette	16.00
Lincoln	45.00
Morehouse	9.00
Natchitoches	55.00
Ouachita	192.00
Sabine	22.00
St. Landry	42.00
St. Martin	4.00
Union	11.00
Vermilion	28.00
Vernon	118.00
Winn	35.00
<b>Total</b>	<b>5,510.00</b>

*Data Source(s): SBA*

## SOCIAL EQUITY, FAIR HOUSING AND CIVIL RIGHTS

It has long been recognized 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. Louisiana

features extensive social vulnerability across the state, as well as extreme exposure to flood, storm, and coastal hazards. Further, many Louisiana residents have experienced multiple flood events, and, therefore, have been repeatedly subjected to interruptions in work when having to rebuild or relocate. This has long-term negative impacts on household wealth, mental health, and community cohesion.<sup>1</sup> Moreover, as illustrated by the Social Vulnerability Index (SoVI®) analysis below, many of Louisiana’s most disaster-prone – and historically impacted – geographies are co-located with pockets of vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity.



OCD, in coordination with the Louisiana Housing Corporation, has designed a suite of programs that account for the eligible needs of the state’s most vulnerable populations, understanding that the funding allocated is not sufficient to serve all households in need of assistance.

As defined in the State Hazard Mitigation Plan, vulnerable populations include persons under the age of 20, persons over the age of 64, persons with disabilities, persons living in poverty, and persons living in manufactured

---

<sup>1</sup> Carla Stanke, et al. “The effects of flooding on mental health: Outcomes and recommendations from a review of the literature” PLoS currents vol. 4 e4f9f1fa9c3cae. (2012): doi:10.1371/4f9f1fa9c3cae



homes. The table below provides a parish-level overview for each of the identified vulnerable populations located within all parishes in the state. As is identified in the program descriptions, the state is prioritizing those most in need of assistance with its housing programs.

## VULNERABLE POPULATIONS

PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
Acadia	28%	15%	19%	20%	17%	Moderate to High
Allen	24%	15%	20%	22%	19%	Moderate to High
Ascension	30%	11%	12%	10%	19%	Low
Assumption	25%	17%	23%	19%	32%	High
Beauregard	27%	15%	20%	14%	31%	Low
Caddo	26%	17%	15%	24%	9%	Moderate to High
Calcasieu	27%	15%	15%	19%	16%	Low
Cameron	26%	16%	14%	14%	38%	Low
East Baton Rouge	26%	14%	15%	18%	3%	Low
East Feliciana	21%	17%	15%	19%	31%	Moderate to High
Grant	23%	15%	18%	19%	29%	Low
Iberia	29%	15%	16%	22%	21%	High
Iberville	23%	15%	20%	19%	20%	Moderate to High
Jackson	23%	20%	24%	19%	20%	High
Jefferson	24%	17%	14%	15%	2%	Low
Acadia	28%	15%	19%	20%	17%	Moderate to High
Allen	24%	15%	20%	22%	19%	Moderate to High



PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
Ascension	30%	11%	12%	10%	19%	Low
Assumption	25%	17%	23%	19%	32%	High
Beauregard	27%	15%	20%	14%	31%	Low
Caddo	26%	17%	15%	24%	9%	Moderate to High
Calcasieu	27%	15%	15%	19%	16%	Low
Cameron	26%	16%	14%	14%	38%	Low
East Baton Rouge	26%	14%	15%	18%	3%	Low
East Feliciana	21%	17%	15%	19%	31%	Moderate to High
Grant	23%	15%	18%	19%	29%	Low
Iberia	29%	15%	16%	22%	21%	High
Iberville	23%	15%	20%	19%	20%	Moderate to High
Jackson	23%	20%	24%	19%	20%	High
Jefferson	24%	17%	14%	15%	2%	Low
Jefferson Davis	28%	16%	17%	19%	18%	High
Lafayette	26%	13%	12%	17%	10%	Low
Lafourche	26%	15%	17%	18%	16%	Low
LaSalle	26%	17%	14%	17%	28%	High
Lincoln	27%	13%	15%	30%	18%	Moderate to High
Livingston	28%	13%	13%	12%	24%	Low
Morehouse	27%	18%	14%	31%	20%	Moderate to High
Natchitoches	29%	16%	14%	20%	22%	High
Orleans	23%	14%	14%	24%	1%	High



PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
Ouachita	28%	15%	13%	24%	13%	High
Plaquemines	29%	13%	15%	15%	27%	High
Pointe Coupee	24%	20%	27%	20%	24%	Moderate to High
Rapides	27%	16%	17%	18%	16%	Moderate to High
Sabine	26%	20%	16%	18%	43%	High
St. Bernard	29%	11%	18%	19%	6%	High
St. Charles	27%	13%	12%	11%	9%	Low
St. Helena	25%	19%	19%	20%	36%	High
St. James	25%	17%	14%	17%	16%	Low
St. John the Baptist	27%	14%	13%	16%	13%	High
St. Landry	29%	16%	12%	23%	21%	High
St. Martin	27%	15%	15%	19%	27%	High
St. Mary	27%	16%	18%	24%	19%	Moderate to High
St. Tammany	26%	16%	15%	12%	7%	Low
Tangipahoa	28%	14%	20%	22%	22%	Moderate to High
Terrebonne	28%	14%	17%	19%	15%	Moderate to High
Union	26%	20%	17%	19%	34%	High
Vermilion	28%	15%	18%	17%	21%	Moderate to High
Vernon	28%	12%	18%	15%	22%	Low
Washington	26%	18%	22%	25%	22%	High
West Baton Rouge	26%	13%	14%	14%	21%	High



PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
West Feliciana	20%	14%	12%	22%	19%	High
Winn	23%	18%	21%	23%	23%	High

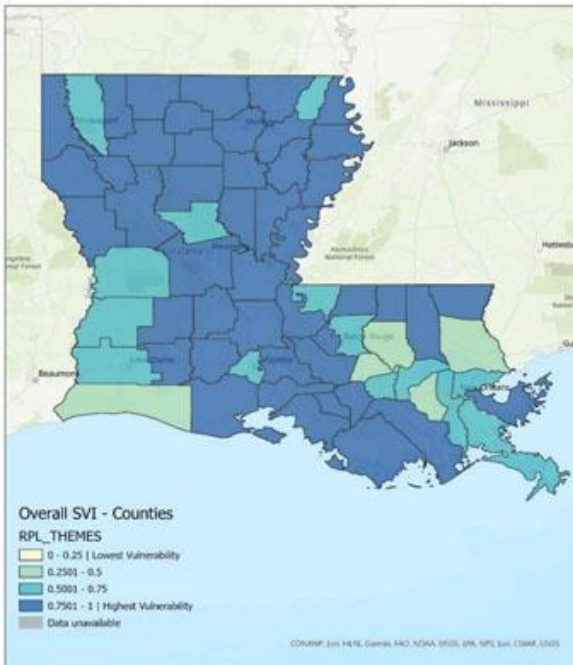
Source: US Census Bureau, American Community Survey and Small Area Income and Poverty Estimates (SAIPE) tool.

### SOCIAL VULNERABILITY INDEX

The CDC’s Social Vulnerability Index focuses on 15 social factors, including unemployment, minority status, and disability, and groups these factors into four related themes: socioeconomic status, household composition & disability, race & ethnicity & language, and housing & transportation. This index is used to explore in analysis to understand how planning on a local level can alleviate the impact of disasters on communities.

The SVI ranks parishes to compare their relative vulnerability to other areas of the state. Rankings are based on percentiles, with values ranging from 0 (low) to 1 (high). SVI ranks the census tracts and counties based on social factors.

According to the CDC’s SVI (as shown in the map below), most parishes in Louisiana have a high social vulnerability.



## PROTECTED CLASSES

In connection with this analysis, the state further provides the following discussion of how the expenditure of CDBG-DR and CDBG-MIT funds may affect members of protected classes under fair housing and civil rights laws. Protected classes are based on the following attributes:

- Color or race
- Disability
- Familial status (i.e., having children under 18 in a household, including pregnant women)
- National origin
- Religion
- Sex

While the program areas included in this Action Plan do not define eligibility based on protected class status, the state – through its history of disaster-recovery work – has documented correlations between adverse impacts, household income levels, and certain protected classes. Therefore, in prioritizing both disaster risk mitigation and benefit to low-and moderate-income households, the state reasonably anticipates that program areas outlined in this Action Plan will have a significant positive impact on protected class populations.

To illustrate the impact of prioritization of LMI households, the following are the available reported demographics of LMI households in Louisiana’s CDBG-DR funded “Piggyback” multifamily affordable rental housing programs.

RACE	% OF HOUSEHOLDS
American Indian/Alaskan Native	0.19%
American Indian/Alaskan Native and Black/African American	0.06%
American Indian/Alaskan Native and White	0.12%
Asian	0.38%
Asian and White	0.04%
Black/African American	52.19%
Black/African American and White	0.86%
Native Hawaiian/Other Pacific Islander	0.12%
Other multi-racial	1.25%
Unknown	31.10%
White	13.69%

RACE	% OF HOUSEHOLDS
<b>Total</b>	<b>100%</b>

Of these, 40 percent are female head of household and 1 percent are Latino.

In its administration of direct beneficiary programs, the state conducts broad outreach and advertisement measures to reach eligible applicants, including purchased and free media advertisements, along with partnering with local officials and interest groups. Initial data collection of unmet needs is conducted through a survey which can be completed by telephone or online submission (including by smartphone). Finally, in areas where a low concentration of homeowners respond to completing the survey, the Program has and can do door-door outreach to canvas these neighborhoods.

Program application processes allow for similar methods. If an interested person indicates a need for translation due to limited English proficiency, such services will be provided upon request.

Through the design of the direct beneficiary and affordable housing programs, the implementation of various targeted outreach measures, and increased coordination with local stakeholders in MID areas, the state expects typical barriers when enrolling in and accessing disaster recovery assistance. Further, the state does not anticipate a discriminatory effect or failure to benefit any racial or ethnic group in proportion to its eligible disaster-related unmet needs.

The design of the various programs incorporates opportunities for eligible households within the constraints of disaster recovery programs advancing Fair Housing. For instance, the state’s buyout model in its 2016 Flood Programs and CDBG MIT includes a housing incentive on top of the fair market value of the distressed or damaged property, up to the parish average. This measure is incorporated in this Action Plan, recognizing the need for the seller of property in a flood-prone area to have additional financial capacity to relocate to safer areas. Similarly, the state’s multifamily housing programs both advance resilience and safety standards, coupled with mixed-income models, which promote safe, integrated housing. The Permanent Supportive Housing Program further expands those housing opportunities to individuals that otherwise may not be able to sustain independent living.

Further, the State complies with the environmental requirements of 24 CFR 58. This environmental review process provides a mechanism to identify potential environmental conditions impacting the use of property for consideration of means to mitigate adverse impacts or provide alternate assistance in the recovery process. At a minimum every project site is inspected and evaluated for potential hazardous materials and contamination, giving specific attention to any proposed site on or in the general proximity of such areas as industrial corridors, waterways, EPA superfund sites, brownfields, leaking underground storage tanks, etc. In addition, the proximity to

hazardous facilities which store, handle or process hazardous substances of a flammable or explosive nature is evaluated as part of the decision-making and mitigation processes.

Tier 1 Environmental Reviews for the housing program have been conducted in accordance with 24 CFR 58 for the affected parishes identified in this Action Plan. The Authority to Use Grant Funds (AUGFs) for the Southwest, Southcentral, Northwest and Northeast Regions were issued April 21, 2022. Site-specific reviews will be conducted to further evaluate certain factors during the Tier 2 reviews as outlined in the Tier 1 reviews. For all projects that do not meet the scope of the tiered reviews, including multifamily housing, separate environmental reviews in accordance with 24 CFR 58 will be conducted.

The state's top priority at this time is for safe, decent, and affordable housing for vulnerable populations, protected classes, and underserved communities. For the owner-occupied housing programs, low- and moderate-income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. In the tenant-based programs, the state will prioritize these vulnerable populations as well as persons displaced by the disaster event in need of affordable housing. The State of Louisiana intends to promote high quality, durable and energy efficient construction methods. All rehabilitation, reconstruction, or new construction will meet an industry-recognized standard that has achieved certification under at least one of the Green Building Standards. In addition, future property damage will be minimized by incorporating resilience standards through requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

Furthermore, the Louisiana Watershed Initiative serves as the state's multi-pronged approach to mitigating future flood risk and expanding resilient development patterns while focusing on natural boundaries. The eight watershed districts have created regional steering committees, representative of the demographics, parishes, and local jurisdictions within each watershed to ensure inclusivity, including members of protected classes, vulnerable populations, and underserved communities, at all levels of decision making

## HOUSING SUMMARY

The state's housing programs are designed to address the needs of individual and households impacted by the hurricanes, with the great majority focused on low to moderate income households. Historically, the overlap of those two characteristics has presented a significant percentage of African-American participants, though the demographics of any particular area impacted by a disaster event will impact the makeup of the eligible beneficiaries. As with any event that broadly affects a populated geographic area, it is anticipated that all protected classes will be represented among the population intended to benefit from the programs.

Planning processes include publicly held outreach events not only at public facilities but also at non-profit locales (churches) on a more local level, at which a majority of participants have been African-American.

When a community is known to have disaster impacts but has an apparent under-representation of applicants to participate in programs – especially for more vulnerable or historically underserved communities – the state enlists the assistance of local stakeholders, including elected officials, in publicizing program opportunities and encouraging participation.

Implementation of programs includes designing processes in a manner to anticipate potential obstacles to obtaining or identifying information or to accessing resources. A major element of this method includes an interactive relationship with the FEMA Disaster Case Management program. Where needed and requested, translators (language and sign) and readers (for visual impaired) are provided. Where necessary for an individual to participate as a direct beneficiary in programs, legal services are provided to eliminate obstacles to participation (i.e. eliminating title issues, legal proceedings to address legal capacity issues). Physical locations for applicant participation are to be compliant with accessibility standards. Where an applicant cannot participate either in person or through online website access, applications may be taken telephonically, with any necessary signatures subsequently being obtained.

Inclusion of indirect beneficiaries (i.e tenants) is implemented in the affordable housing rental programs through fair housing training for the property owners landlords for non-institutional property owners. Larger multifamily housing projects are required to have affirmative marketing plans

#### **AFFIRMATIVELY FURTHER FAIR ACTION (AFFA)**

While all programs within the Action Plan are designed for compliance with all applicable statutes and regulations, including Fair Housing, several specific examples of use of the CDBG-DR funds to further the AFFH goals include:

1. Housing buyouts are specifically designed to provide the owner occupants of properties with distressed property values with the economic ability to relocate to a home in an area free from flooding probabilities. The housing incentive component considers the parish housing cost average for a similarly situated home,
2. The PRIME multifamily housing program not only results in highly resilient housing structures, but in quality, economically mixed communities by requiring a portion of the units to be rented at market rates, to avoid concentration of poverty and promote integrated communities
3. Non-institutional landlords are required to participate in fair housing training.
4. Local jurisdictions receiving funds for nonfederal match commit to affirmatively furthering of fair housing, which activities are then monitored by the state.



## GRANTEE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

DEMOGRAPHIC	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Under 5 years	307,435.00	7%	115,361.00	38%	95,470.00	31%
65 years and over	698,018.00	15%	253,330.00	36%	203,095.00	29%
Population with a Disability	695,791.00	15%	248,618.00	36%	199,636.00	29%
White or Caucasian	2,735,887.00	59%	1,044,884.00	38%	849,208.00	31%
Black or African American	1,492,386.00	32%	517,608.00	35%	423,775.00	28%
American Indian and Alaska Native	23,892.00	1%	7,807.00	33%	5,540.00	23%
Asian	80,014.00	17%	20,581.00	26%	16,751.00	21%
Native Hawaiian and Other Pacific Islander	1,088.00	1%	417.00	38%	388.00	36%
Other	82,139.00	2%	29,772.00	36%	23,952.00	29%
<b>Total</b>	<b>4,664,362.00</b>	<b>100%</b>	<b>1,683,115.00</b>	<b>36%</b>	<b>1,370,828.00</b>	<b>29%</b>

Data Source(s): 2019 ACS 5 year

## EDUCATION DEMOGRAPHICS

EDUCATION	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Population 25 and over	3,125,153.00	100%	1,110,755.00	36%	905,505.00	29%
Less than high school graduate	461,706.00	15%	168,293.00	36%	132,257.00	29%
High School graduate or equivalency	1,061,388.00	34%	406,661.00	38%	320,594.00	30%
Some college, associate degree	848,474.00	27%	298,038.00	35%	248,486.00	29%



EDUCATION	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Bachelor's degree or higher	753,585.00	24%	237,763.00	32%	204,168.00	27%
<b>Total</b>						

Data Source(s): 2019 ACS 5 year

### INCOME DEMOGRAPHICS

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	AREAS IMPACTED BY DISASTER	HUD MIDS
Median Household Income	\$49,469.00	\$42,950.00	\$46,857.00
Per Capita Income	\$27,923.00	\$23,858.00	\$25,408.00
Income in the past 12 months below poverty level	\$0.00	\$0.00	\$0.00
<b>Total</b>			

Data Source(s): 2019 ACS 5 year (Dollar amounts not provided in data source, only percentages. )

### INCOME DEMOGRAPHICS - LOW INCOME

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	AREAS IMPACTED BY DISASTER	HUD MIDS
Income in the past 12 months below poverty level	\$0.00	\$0.00	\$0.00
<b>Total</b>	\$0.00	\$0.00	\$0.00

Data Source(s): OCD

### LMI ANALYSIS - OVERALL

CATEGORY	TOTAL LMI PERSONS	TOTAL POPULATION	PERCENT LMI
Area wide	1,679,170.00	4,664,362.00	39%
<b>Total</b>			

Data Source(s): 5-Year ACS

## LMI ANALYSIS - FEDERALLY DECLARED DISASTER AREAS

COUNTY	NON-MID-TOTAL LMI PERSONS	NON-MID-TOTAL POPULATION	NON-MID-PERCENTAGE LMI	MID-TOTAL LMI PERSONS	MID-TOTAL POPULATION	MID-PERCENTAGE LMI
Acadia	0.00	0.00	0%	175.00	257.00	68%
Allen	0.00	0.00	0%	196.00	287.00	68%
Beauregard	0.00	0.00	0%	356.00	535.00	67%
Caddo	0.00	0.00	0%	328.00	429.00	76%
Calcasieu	0.00	0.00	0%	5,844.00	8,844.00	66%
Cameron	0.00	0.00	0%	327.00	704.00	46%
Grant	94.00	136.00	69%	0.00	0.00	0%
Iberia	52.00	60.00	87%	0.00	0.00	0%
Jackson	13.00	26.00	50%	0.00	0.00	0%
Jefferson Davis	0.00	0.00	0%	247.00	367.00	67%
La Salle	2.00	7.00	29%	0.00	0.00	0%
Lafayette	0.00	0.00	0%	183.00	225.00	81%
Lincoln	27.00	46.00	59%	0.00	0.00	0%
Morehouse	39.00	58.00	67%	0.00	0.00	0%
Natchitoches	0.00	0.00	0%	102.00	142.00	72%
Ouachita	0.00	0.00	0%	219.00	315.00	70%
Rapides	0.00	0.00	0%	581.00	837.00	69%
Sabine	24.00	43.00	56%	0.00	0.00	0%
St. Landry	0.00	0.00	0%	210.00	273.00	77%
St. Martin	53.00	63.00	84%	0.00	0.00	0%
Union	34.00	47.00	72%	0.00	0.00	0%
Vermilion	0.00	0.00	0%	125.00	186.00	67%
Vernon	0.00	0.00	0%	147.00	222.00	66%
Winn	26.00	51.00	51%	0.00	0.00	0%
<b>Total</b>	<b>364.00</b>	<b>537.00</b>	<b>624%</b>	<b>9,040.00</b>	<b>13,623.00</b>	<b>960%</b>

Data Source(s): FEMA IA Data

## MANUFACTURED HOUSING UNITS IMPACTED BY DISASTER

COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY	REMAINING UNMET NEED
Benton	63.00	9%	0.00
Boone	22.00	6%	0.00
Cedar	16.00	5%	0.00
Clinton	10.00	2%	0.00
Jasper	39.00	4%	0.00
Linn	1,007.00	8%	0.00
Marshall	65.00	5%	0.00
Polk	59.00	3%	0.00
Poweshiek	16.00	8%	0.00
Scott	57.00	4%	0.00
Story	49.00	10%	0.00
Tama	21.00	5%	0.00
<b>Total</b>	<b>1,424.00</b>	<b>69%</b>	<b>0.00</b>

Data Source(s): FEMA

## SNAP AND D-SNAP APPLICANTS IMPACTED BY THE DISASTER

COUNTY	# OF SNAP HOUSEHOLDS IMPACTED	# OF SNAP INDIVIDUALS IMPACTED	# OF HOUSEHOLDS ISSUED D-SNAP BENEFITS	# OF INDIVIDUALS ISSUED D-SNAP BENEFITS
Statewide	224,324.00	476,236.00	207,042.00	439,547.00
<b>Total</b>	<b>224,324.00</b>	<b>476,236.00</b>	<b>207,042.00</b>	<b>439,547.00</b>

Data Source(s): Louisiana Department of Children and Family Services

## LIMITED ENGLISH PROFICIENCY BREAKDOWN OF DISASTER-RELATED AREAS

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Acadia	1,499.00	1%
Allen	653.00	1%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Ascension	1,843.00	1%
Assumption	515.00	0%
Avoyelles	1,099.00	1%
Beauregard	393.00	0%
Bienville	63.00	0%
Bossier	2,746.00	2%
Caddo	3,262.00	3%
Calcasieu	3,455.00	3%
Caldwell	115.00	0%
Cameron	97.00	0%
Catahoula	44.00	0%
Claiborne	34.00	0%
Concordia	79.00	0%
De Soto	310.00	0%
East Baton Rouge	12,168.00	10%
East Carroll	25.00	0%
East Feliciana	18.00	0%
Evangeline	1,471.00	1%
Franklin	56.00	0%
Grant	700.00	1%
Iberia	2,438.00	2%
Iberville	226.00	0%
Jackson	142.00	0%
Jefferson	33,538.00	27%
Jefferson Davis	460.00	0%
Lafayette	7,381.00	6%
Lafourche	3,832.00	3%
La Salle	254.00	0%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Lincoln	1,147.00	1%
Livingston	1,257.00	1%
Madison	67.00	0%
Morehouse	140.00	0%
Natchitoches	275.00	0%
Orleans	12,754.00	10%
Ouachita	941.00	1%
Plaquemines	683.00	1%
Pointe Coupee	299.00	0%
Rapides	2,428.00	2%
Red River	52.00	0%
Richland	22.00	0%
Sabine	198.00	0%
St. Bernard	1,748.00	1%
St. Charles	1,029.00	1%
St. Helena	94.00	0%
St. James	175.00	0%
St. John the Baptist	945.00	1%
St. Landry	2,419.00	2%
St. Martin	2,245.00	2%
St. Mary	1,835.00	1%
St. Tammany	5,217.00	4%
Tangipahoa	1,725.00	1%
Tensas	29.00	0%
Terrebonne	2,870.00	2%
Union	254.00	0%
Vermilion	2,348.00	2%
Vernon	981.00	1%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Washington	1,011.00	1%
Webster	252.00	0%
West Baton Rouge	301.00	0%
West Carroll	84.00	0%
West Feliciana	64.00	0%
Winn	15.00	0%
<b>Total</b>	<b>124,820.00</b>	<b>97%</b>

Data Source(s): U.S. Census Bureau

### AFFECTED CONTINUUM OF CARE ENTITIES

COC NUMBER	COC ENTITY	IMPACTED COUNTY	HOMELESS COUNT
LA-500	Lafayette/Acadiana CoC	Acadia, St. Landry, St. Martin & Vermilion	417.00
LA-502	Shreveport, Bossier/Northwest Louisiana CoC	Caddo, Bossier	298.00
LA-503	New Orleans/Jefferson Parish CoC	Jefferson and Orleans Parishes	1,314.00
LA-505	Monroe/Northeast Louisiana CoC	Jackson, Lincoln, Morehouse, Ouachita & Union Parishes	162.00
LA-506	Slidell/Southeast Louisiana CoC	Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes	118.00
LA-507	Alexandria/Central Louisiana CoC	Grant, La Salle, Rapides, Vernon & Winn Parishes	107.00
LA-509	Louisiana Balance of State CoC	Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes	757.00
<b>Total</b>	<b>3,173.00</b>		

Data Source(s): HUD Exchange

### POINT-IN-TIME COUNT - TYPE OF SHELTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
Statewide	1,429.00	591.00	1,153.00	3,173.00
FEMA Declared	31.00	33.00	111.00	175.00
MIDs	25.00	27.00	90.00	142.00
<b>Total</b>				

Data Source(s): HUD Exchange

### POINT-IN-TIME COUNT - IMPACTED BY DISASTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
Statewide	861.00	193.00	350.00	1,404.00
FEMA Declared	31.00	33.00	111.00	175.00
MIDs	25.00	27.00	90.00	142.00
<b>Total</b>				

Data Source(s): HUD Exchange

### ASSISTED HOUSING IMPACTED BY THE DISASTER

COUNTY	TOTAL HOUSING CHOICE VOUCHERS	TOTAL IMPACTED HOUSING CHOICE VOUCHER UNITS	TOTAL LIHTC UNITS	TOTAL IMPACTED LIHTC UNITS	TOTAL PUBLIC HOUSING DWELLING UNITS	TOTAL IMPACTED PUBLIC HOUSING DWELLING UNITS	REMAINING UNMET NEED
Acadia	773.00	0.00	610.00	0.00	756.00	60.00	0.00
Allen	391.00	2.00	267.00	0.00	322.00	16.00	0.00
Beauregard	38.00	0.00	120.00	0.00	222.00	25.00	0.00
Caddo	4,714.00	0.00	4,054.00	0.00	1,062.00	0.00	0.00
Calcasieu	2,506.00	1,024.00	3,880.00	1,184.00	737.00	405.00	0.00
Cameron	0.00	0.00	70.00	0.00	0.00	0.00	0.00





COUNTY	TOTAL HOUSING CHOICE VOUCHERS	TOTAL IMPACTED HOUSING CHOICE VOUCHER UNITS	TOTAL LIHTC UNITS	TOTAL IMPACTED LIHTC UNITS	TOTAL PUBLIC HOUSING DWELLING UNITS	TOTAL IMPACTED PUBLIC HOUSING DWELLING UNITS	REMAINING UNMET NEED
Grant	0.00	0.00	0.00	0.00	163.00	48.00	0.00
Iberia	399.00	0.00	695.00	0.00	200.00	0.00	0.00
Jackson	474.00	0.00	138.00	0.00	281.00	3.00	0.00
Jefferson Davis	962.00	0.00	296.00	0.00	175.00	78.00	0.00
La Salle	45.00	0.00	32.00	0.00	25.00	0.00	0.00
Lafayette	1,958.00	0.00	2,118.00	0.00	662.00	442.00	0.00
Lincoln	201.00	0.00	985.00	0.00	407.00	0.00	0.00
Morehouse	0.00	1.00	603.00	0.00	40.00	0.00	0.00
Natchitoches	552.00	0.00	809.00	0.00	166.00	0.00	0.00
Ouachita	1,743.00	1.00	2,510.00	0.00	1,523.00	3.00	0.00
Rapides	1,953.00	0.00	1,558.00	0.00	121.00	160.00	0.00
Sabine	0.00	0.00	320.00	0.00	68.00	0.00	0.00
St. Landry	0.00	0.00	787.00	0.00	1,038.00	0.00	0.00
St. Martin	463.00	0.00	288.00	0.00	395.00	0.00	0.00
Union	98.00	0.00	370.00	0.00	40.00	0.00	0.00
Vermilion	721.00	0.00	696.00	0.00	469.00	53.00	0.00
Vernon	0.00	0.00	478.00	0.00	90.00	0.00	0.00
Winn	114.00	0.00	164.00	0.00	141.00	0.00	0.00
<b>Total</b>	<b>18,105.00</b>	<b>1,028.00</b>	<b>21,848.00</b>	<b>1,184.00</b>	<b>9,103.00</b>	<b>1,293.00</b>	<b>0.00</b>

Data Source(s): Louisiana Housing Corporation

## B. INFRASTRUCTURE UNMET NEED.

### Disaster Damage and Impacts.

#### STATEWIDE INFRASTRUCTURE DAMAGE & LOSS ASSESSMENT

There have been 33 major disaster declarations in the State of Louisiana since 2000. The most common natural disasters that cause damages to an extent that results in a federal disaster declaration are hurricanes and flooding. Rebounding from extensive infrastructure damages from previous disasters was already an existing challenge prior to Hurricanes Laura and Delta. This historical pattern of extreme weather has continued and is expected to become more severe due to climate change.

The state's current and pre-disaster development patterns heavily rely on surface transportation that is subject to flood inundation in a severe flood event, potentially leaving residents stranded or in danger of rising water and taxing emergency responders' ability to provide critical safety and security services. Currently and pre-disaster, many existing critical facilities serving Louisiana residents face significant flood risk, thereby inhibiting emergency management procedures and delaying service continuity following a disaster event.

Hurricane Laura toppled more than 1,000 massive towers with high voltage transmission lines that carry electricity from power plants to communities like Lake Charles in Calcasieu Parish. It also damaged water and wastewater systems and knocked out cell towers that provide mobile phone service. Similarly, Hurricane Ida had devastating impacts on the high voltage transmission lines with most notably one of the tower lines falling into the Mississippi River due to the collapse of one of the transmission towers which temporarily limited vessel traffic on the river.

#### FEMA PUBLIC ASSISTANCE

FEMA's Public Assistance Program provides supplemental grants to state, tribal, territorial, and local governments, and certain types of private non-profits so that communities can quickly respond to and recover from major disasters or emergencies. FEMA also encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. The state will further work with each grantee to promote post disaster recovery and mitigation planning.

For DR-4559 (Hurricane Laura), the state's obligation has been established as 10 percent of eligible project costs. For DR-4570 and DR-4577 (Hurricanes Delta and Zeta), the state's obligation has been established as 10 percent of eligible project costs.

As of February, \$2.7 billion has been identified in PA need for these three storms. Based on these data, the current unmet need, or PA non-federal share estimate is \$242 million (\$217 million for Hurricane Laura and \$13 million for Hurricane Delta). The state will be allocating funds to address a portion of this unmet need.

Due to the nature of this program, the state anticipates that some of the specific needs included in the public assistance will have had a particular urgency, including existing conditions posing a serious and immediate threat to the health and welfare of the community.

### HAZARD MITIGATION GRANT PROGRAM

The Hazard Mitigation Grant Program (HMGP) will be a critical part of the long-term recovery process in both rebuilding and protecting housing stock and vital infrastructure. HMGP is generally calculated at 15 percent of the total amount of IA and PA allocated to a disaster event, up to the first \$2 billion. With assistance in excess of \$2 billion, the amount of HMGP funds made available decreases to 10 percent and then 7.5 percent on a sliding scale.

The state's required local match obligation for Hurricanes Laura/DR-4559 and Delta/DR-4570 has been established as not less than 10 percent of eligible project costs. Therefore, the state's unmet need, or HGMP non-federal share estimate is \$35 million.

The Louisiana Watershed Initiative (LWI) represents a state framework to continue planning, coordination, and collaboration to advance preparedness and mitigation measures. The goal to reduce or alleviate risk across multiple local jurisdictions and enact consistent mitigation standards across five state agencies is a definitive part of the LWI framework for watershed management. The state will leverage LWI and its existing best practices of what is allocated in FEMA's HMGP funding as individual parish hazard mitigation dollars to focus on large infrastructure projects that benefit regional watersheds (including improving drainage and other mitigation measures that sustain larger regions, rather than focusing on small projects in small areas). Long term strategies will continue to be an integral part of the state's preparedness and mitigation planning.

The program's narrative describes how resilience planning, preparedness and mitigation measures will be integrated into rebuilding activities for both non-federal match programs in a similar structure implemented in the state's CDBG-MIT programs under the Louisiana Watershed Initiative. These measures are also built within the FEMA structure and the state shall monitor these efforts. This match aligns with the unmet needs associated with other planned state, local and regional projects.

## FEMA Public Assistance Program

PA CATEGORY	# DAMAGED SITES	SUM OF APPROX. COST	SUM OF FEDERAL SHARE	SUM OF NON-FEDERAL SHARE
A - Debris	351	\$632,406,010.00	\$538,144,267.00	\$49,261,734.00
B - Emergency Measures	1,046	\$690,852,394.00	\$635,887,367.00	\$54,965,026.00
C - Roads and Bridges	95	\$15,593,272.00	\$14,033,945.00	\$1,559,327.00
D - Water Control Facilities	23	\$38,963,799.00	\$35,067,419.00	\$3,896,380.00
E - Building and Equipment	1,490	\$826,809,449.00	\$744,407,481.00	\$82,401,968.00
F - Utilities	187	\$344,451,354.00	\$310,014,842.00	\$34,436,512.00
G - Other	231	\$36,045,266.00	\$32,440,739.00	\$3,604,526.00
All Categories	3,423	\$2,585,121,544.00	\$2,354,996,070.00	\$230,125,473.00
TOTAL - without A and B:	2,026	\$1,261,863,140.00	\$1,135,964,426.00	\$125,898,713.00
<b>Total</b>				

Data Source(s): GOHSEP

## Total Cost and Need by PA Category

PA CATEGORY	ESTIMATED PA COST	10% LOCAL MATCH	15% RESILIENCY	TOTAL NEED (MATCH + RESILIENCY)
A - Debris	\$632,406,010.00	\$63,240,601.00	\$94,860,902.00	\$158,101,503.00
B - Emergency Measures	\$690,852,394.00	\$69,085,239.00	\$103,627,859.00	\$172,713,098.00
C - Roads and Bridges	\$15,593,272.00	\$1,559,327.00	\$2,338,991.00	\$3,898,318.00
D - Water Control Facilities	\$38,963,799.00	\$3,896,380.00	\$5,844,570.00	\$9,740,950.00
E - Building and Equipment	\$826,809,449.00	\$82,680,945.00	\$124,021,417.00	\$206,702,362.00



PA CATEGORY	ESTIMATED PA COST	10% LOCAL MATCH	15% RESILIENCY	TOTAL NEED (MATCH + RESILIENCY)
F - Utilities	\$344,451,354.00	\$34,445,135.00	\$51,667,703.00	\$86,112,838.00
G - Other	\$36,045,266.00	\$3,604,527.00	\$5,406,790.00	\$9,011,316.00
<b>Total</b>	<b>\$2,585,121,544.00</b>	<b>\$258,512,154.00</b>	<b>\$387,768,232.00</b>	<b>\$646,280,385.00</b>

Data Source(s): GOHSEP

### Approximate Recovery Cost per Agency

AGENCY	APPROXIMATE COST
City or Township Government	\$319,851,083.00
County Government	\$588,274,383.00
Independent School District	\$280,368,416.00
Indian/Native American Tribal Government (Federally Recognized)	\$56,637.00
Indian/Native American Tribally Designated Organization	\$84,916.00
Nonprofit with 501C3 IRS Status	\$456,793,951.00
Nonprofit without 501C3 IRS Status	\$103,162,651.00
Public/Indian Housing Authority	\$23,281,528.00
Public/State Controlled Institution of Higher Education	\$1,036,373.00
Special District Government	\$190,266,194.00
State Government	\$391,819,939.00
<b>Total</b>	<b>\$2,354,996,071.00</b>

Data Source(s): GOHSEP

### Hazard Mitigation Needs per County or Known Project

PROJECT	COST	FUNDING SOURCE	UNMET NEED
Statewide	\$140,931,096.00	FEMA	\$35,232,774.00
<b>Total</b>	<b>\$140,931,096.00</b>		<b>\$35,232,774.00</b>

Data Source(s): GOHSEP

## C. ECONOMIC REVITALIZATION UNMET NEED.

### Disaster Damage and Impacts.

#### STATEWIDE ECONOMIC DAMAGE & LOSS ASSESSMENT

As Louisiana was recovering from FEMA-declared damage to 56 out of 64 parishes as a result of the 2016 floods, the state's economy was still rebounding. These events left an indelible mark on Louisiana and have exposed new challenges to the state's approach to flood risk reduction for households and infrastructure. Further, the existing barriers to economic recovery for Louisiana also stemmed from communities and businesses struggling to rebuild in the time of a global pandemic.

Immediately following Hurricane Laura and then Hurricane Delta, the Louisiana Department of Economic Development (LED) partnered with a private economic consulting group to conduct an assessment of economic damages resulting from these two disaster events. LED did not seek a formal economic impact analysis for Hurricane Zeta. They did, however, conduct an initial survey of economic driver companies in the week after Zeta landfall. It should be noted that all of the areas impacted by Hurricane Zeta were also amongst the Hurricane Ida impacted areas, and assessments for Hurricane Ida have been conducted and included. Key findings from these assessments follow.

#### **The peak business disruption impacts across Louisiana include:**

- Laura: 34,740 business operations, nearly 28 percent of all businesses in Louisiana;
- Delta: 29,503 business operations, over 23 percent of all businesses in Louisiana.

#### **The number of employees impacted at peak of hurricanes includes:**

- Laura: 479,975, nearly 29 percent of all Louisiana workers;
- Delta: 388,277, nearly 23 percent of all Louisiana workers.

#### **The estimated damages to business total \$6.7 million:**

- Laura: \$2.8 billion in structural damage; \$1.1 billion in equipment loss; \$1.9 billion in interruption loss (lost labor productivity and value added costs).
- Delta: \$251.5 million in structural damage; \$51.3 million in equipment loss; \$601 million in interruption loss (lost labor productivity and value added costs).

**According to the LSU Ag Center, total agricultural losses total \$2.12 billion including timber and crops - rice, sugar cane, soybeans, cotton, crawfish, corn – and are broken down as follows:**

- Laura: total \$1.6 billion in agriculture losses; \$1.1 billion in timber, possibly the worst in Louisiana history; and \$525 million in crop
- Delta: total \$516 million in agriculture losses; \$297 million in timber; and \$219 million in crop

## BUSINESS & WAGE LOSSES

The LED-commissioned study for Laura measured business losses starting the day prior to Hurricane Laura's landfall, August 26, through September 30, 2020. The LED-commissioned study for Delta measured business losses beginning the day Hurricane Delta made landfall on October 9 and continued until October 20, 2020. The LED-commissioned study for Ida measured business losses starting two days prior to Hurricane Ida's landfall, August 27, through September 16, 2021. To illustrate these losses, the study estimated the percent of businesses closed each day during the study period, and based its estimates on publicly known utility outages, local news outlets and local contacts surveying the damage.

Both business interruption and property damages are informed by the wind speed of the hurricane at various locations. Both the wind model and other computations were also informed by satellite imagery and local inspection of the damages. Interruptions extended beyond the businesses directly impacted by rain and wind due to highway closures, like I-10 among others, that disrupted travel for workers as well as customers. Finally, estimates were adjusted by industry sector to account for the point that some economic sectors may have closed completely while others may have generally continued to operate at close to normal capacity. For example, Hurricane Laura hit a petrochemical hub with over 7,500 employees and thousands more that do contract work, but experienced minimal losses as the facility had been specifically engineered to continue operations in spite of the conditions present during and following Hurricane Laura.

To characterize business disruption losses, the LED study estimated: 1) the number of business damaged and 2) the number of employees impacted each day of the study period for Laura, Delta, and Ida. It also estimated 3) the lost worker productivity, measured by wages and 4) lost value added. Many of the employees were being paid even if they weren't working. This is deemed a loss in an employee's productivity, and the employer bears the cost. These estimates are the gross interruptions from Laura, Delta, and Ida, and the estimates do not take into account the offset from increased employment and productivity due to the response and recovery efforts. The increased activity from recovery efforts should be expected to bring more resources to the area which would offset some of the losses to residents in terms of personal possessions like homes and automobiles, and business losses in terms of assets and inventory.

Additionally, the studies for Hurricanes Laura and Delta estimated losses while also accounting for losses already endured by the region due to Covid-19. To incorporate Covid-19, the study utilized a survey done by the Louisiana Workforce Commission to baseline the Covid-19 impact. The adjustment for firm closures is reduced for wages

and employment to account for the fact that smaller firms were more likely to be closed due to COVID than larger firms.

**Hardest Hit Parishes Laura:** The hardest-hit area primarily due to its large population, concentration of businesses, and proximity to Laura's landfall, Calcasieu Parish, had nearly 5,000 businesses and 87,000 employees impacted. Even though Ouachita Parish was not as near to Laura's landfall as Calcasieu Parish, the storm's winds were still hurricane force impacting over 2,000 businesses and over 33,000 employees. Laura made landfall in Cameron Parish causing devastating damage, but because of its rural nature, Laura's impact was relatively smaller with an estimated 152 businesses and over 7,000 employees impacted.

**Hardest Hit Parishes Delta:** The hardest hit areas primarily due to their concentration of businesses and proximity to Delta's landfall, Lafayette and Calcasieu Parishes, had a combined nearly 13,000 businesses and 175,000 employees impacted. Even though Rapides Parish was not as near to Delta's landfall as these other two parishes, the storm's winds were still hurricane force impacting over 3,000 businesses and almost 45,000 employees.

Finally, the LED study provided an economic estimate of damages to business structures and equipment attributable to Hurricanes Laura and Delta. Business damages to structures and equipment are calculated at the location level utilizing InfoUSA data including: latitude and longitude, number of employees and NAICS code for the six most affected parishes in Southwest Louisiana. The U.S. Bureau of Economic Analysis provides data used to obtain a baseline value of business structures and equipment per employee at the two-digit NAICS industry level. Multiplying these values per employee for the relevant industry by the number of employees at a particular location supplies the baseline estimate of the value of a structure and equipment present at a particular location.

Overall, the model estimates \$3.1 billion in damage to business structures. The largest impacts occur for Calcasieu Parish with over \$2.0 billion and Cameron Parish with \$300 million in damages. The model additionally estimates more than \$1.1 billion in damage to business equipment. Calcasieu Parish again registers the largest estimated damages with \$832 million.

With the above mentioned business losses and physical property damages, combined with feedback from outreach efforts, the state has been informed of the need for more workforce development opportunities, and urged to include program funding for trades that are suffering from shortages of skilled workers to repair existing or construct new properties.

## AGRICULTURAL LOSSES

Based on estimates completed by the LSU AgCenter, the economic impacts from Hurricanes Laura and Delta on Louisiana's agricultural sector are estimated to be \$2.1 billion. Because these hurricanes were predominately wind events rather than flooding events, the destruction of the state's timber industry may be the most



devastating in history at \$1.4 billion. Destroyed timber will likely be unrecoverable from the southwestern corner to the northeastern corner of the state. The sustained winds are responsible for losses to the timber stock by devastating 1.1 billion acres of timberland. Aerial surveys done by the Louisiana Department of Agriculture and Forestry show the largest economic losses in timber from Hurricane Laura occurred in Vernon Parish with \$360 million on 160,416 acres. There was more than \$100 million in timber damage in each of Rapides, Beauregard, Grant, and Allen parishes. Calcasieu Parish had 188,292 timber acres lost with an economic value estimated at \$76.7 million. From Hurricane Delta, Winn Parish and Vernon Parish had the largest timber losses with each receiving \$59 million of estimated losses.

Table below gives the different types of agricultural losses:

### AGRICULTURAL LOSSES

TYPE OF LOSS	LAURA	DELTA	TOTAL
Reduced Production	\$48,400,000	\$51,100,000	\$99,500,000
Stored Commodity Loss	\$6,900,000	\$400,000	\$7,300,000
Livestock Loss	\$1,400,000	\$400,000	\$1,800,000
Increased Production Cost	\$6,700,000	\$3,800,000	\$10,500,000
Infrastructure Damage	\$462,000,000	\$163,500,000	\$625,500,000
Timber Losses	\$1,100,000,000	\$297,100,000	\$1,397,100,000
Total Losses	\$1,625,400,000	\$516,300,000	\$2,141,700,000

To date, one primary form of known assistance approved to address the losses described above is assistance through the Small Business Administration's (SBA) Business Economic Injury Disaster Loan Program. As of November 8, 2021, the following is the status of SBA loan approvals.

- Laura: 6,487 loans have been applied for with 1,089 approved for a total of \$264,238,450.
- Delta: 746 loans have been applied for with 78 approved for a total of \$9,457,300.

Another significant known source of assistance is Paid/Reserves of Reported claims reported through the Louisiana Department of Insurance (DOI). Business losses with accompanying assistance have been accounted for in calculating approximately \$4.2 billion in economic unmet needs.

### SUMMARY OF ECONOMIC UNMET NEEDS

TYPE OF LOSS	LAURA	DELTA	TOTAL
Business Structures	\$2,810,100,000	\$251,500,000	\$3,061,600,000

TYPE OF LOSS	LAURA	DELTA	TOTAL
Business Equipment	\$1,056,800,000	\$51,300,000	\$1,108,100,000
Business Interruption <sup>1</sup>	\$1,914,900,000	\$601,700,000	\$2,516,600,000
Agriculture/Timber	\$1,625,400,000	\$516,300,000	\$2,141,700,000
Business/EIDL Loans	\$(264,238,450)	\$(9,457,300)	\$(273,695,750)
Paid/Reserves of Reported Claims	\$(4,182,538,638)	\$(212,178,268)	\$(4,394,716,906)
<b>Total Unmet Needs</b>	<b>\$2,960,422,912</b>	<b>\$1,199,343,432</b>	<b>\$4,159,587,344</b>

<sup>1</sup> includes labor productivity and value-added losses

## Total Business Loans Approved by the SBA

COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Acadia	n/a	\$1,882,200.00
Allen	n/a	\$3,827,600.00
Beauregard	n/a	\$5,601,900.00
Caddo	n/a	\$66,100.00
Calcasieu	n/a	\$219,010,250.00
Cameron	n/a	\$2,843,400.00
Grant	n/a	\$6,068,800.00
Iberia	n/a	\$5,882,900.00
Jackson	n/a	\$754,200.00
Jefferson Davis	n/a	\$3,001,500.00
La Salle	n/a	\$317,300.00
Lafayette	n/a	\$917,000.00
Lincoln	n/a	\$2,046,800.00
Natchitoches	n/a	\$1,498,200.00
Ouachita	n/a	\$5,407,200.00
Rapides	n/a	\$11,954,200.00
Sabine	n/a	\$285,000.00
St. Landry	n/a	\$349,800.00

COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
St. Martin	n/a	\$120,200.00
Union	n/a	\$43,100.00
Vermilion	n/a	\$194,700.00
Vernon	n/a	\$1,525,100.00
Winn	n/a	\$98,300.00
<b>Total</b>		<b>\$273,695,750.00</b>

Data Source(s): SBA

## SBA Applicant Breakdown

APPLICATION TYPE	# OF APPLICATIONS	PERCENT
Processed Applications	5,817.00	77%
In-Process Applications	1.00	1%
Declined Applications	2,136.00	28%
Withdrawn Applications	2,453.00	32%
Approved Applications	1,228.00	16%
Unmet Need	0.00	0%
<b>Total</b>	<b>7,557.00</b>	<b>100%</b>

Data Source(s): SBA

## iv. Estimating Business Operations Losses

OPERATIONAL LOSS CATEGORY	COUNT OF BUSINESSES WITH VERIFIED LOSSES	AVERAGE VERIFIED LOSS	ESTIMATED ADDITIONAL LOSSES TO BUSINESSES
Furniture	0.00	\$0.00	\$0.00
Machinery	32,122.00	\$129,810.00	\$4,169,700,000.00
Inventory	0.00	\$0.00	\$0.00
Other	32,122.00	\$145,021.00	\$4,658,300,000.00
<b>Total</b>	<b>64,244.00</b>	<b>\$274,831.00</b>	<b>\$8,828,000,000.00</b>

Data Source(s): Louisiana Department of Economic Development

## Increased Occupation Demands

OCCUPATION	CURRENTLY UNEMPLOYED	CURRENTLY EMPLOYED	PROJECTED EMPLOYMENT	PROJECTED GROWTH #	PROJECTED GROWTH %	TOTAL JOB OPENINGS	SUPPLY GAP OR OVERAGE
0	0.00	0.00	0.00	0.00	0%	0.00	0.00
<b>Total</b>							

*Data Source(s): Not available*

*This could be used as justification for a job training need related to disaster*

## D. MITIGATION ONLY ACTIVITIES

The state has conducted a mitigation needs assessment, which is further detailed in the **Preparedness, Mitigation, and Resiliency** section of the Action Plan. The state will be funding the non-federal match for HMGP which is an eligible CDBG-DR activity. All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities.

### RESILIENCE PLANNING:

The state's proposed plan budgets sufficient funding for planning initiatives to establish mitigation measures and build more resilient communities through education, outreach and funding. OCD recognizes the need for such efforts and has been working closely with local governments in the HUD-identified MID areas who are developing and executing local strategic plans and disaster recovery plans that are grounded in community resilience.

Much of the state's resilience outreach and education efforts are taking place through the Louisiana Watershed Initiative, a CDBG-MIT statewide program coordinating funding and resources to reduce flood risk through a watershed-based approach. LWI represents a paradigm shift in Louisiana's efforts to understand and mitigate flood risk, interweaving these efforts within all state water management programs, including disaster recovery, so that resilience is at the forefront of all decision-making.

Following the launch of the initiative in 2018, the state has held dozens of meetings with leaders in all 64 parishes, a listening tour, a best practices summit and an interstate summit. Through LWI, the state also published an outreach and engagement toolkit that provides information and resources for community stakeholders and partners to engage with the public and support LWI's long-term resilience goals.

Today, LWI is coordinating the distribution of \$1.2 billion in CDBG-MIT funds, with a focus on educating stakeholders and the public on flood risk and effective mitigation efforts, particularly within underserved communities. Through LWI, the state has held technical assistance sessions for project funding opportunities as

well as flood risk presentations in each region of the state. The LWI team also facilitated a nine-part webinar training series on nature-based solutions for flood risk management, along with an information guide published on the LWI website.

Through LWI, the state has also awarded funding to mitigation projects that present alternatives to traditional gray infrastructure projects, such as flood storage projects, nonstructural buyout programs and floodplain preservation projects. Many of these projects are located in areas where our most vulnerable residents reside. These projects represent mitigation measures that educate the surrounding community on different ways of dealing with flood risk, and also represent significant investments in statewide flood defense to better prepare Louisiana for future and curb the massive costs associated with disaster recovery efforts.

The following information provides examples of current policy related to the current OCD mitigation and Flood 2016 grant. These policies are examples that address: (c) establish and support recovery efforts by funding feasible, cost-effective measures that will make communities more resilient against a future disaster. Currently, the Action Plan maintains that the state's policies and procedures will address the assessment of cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation, reconstruction program, or activity funded with CDBG-DR funds. Policies and procedures will also address possible alternatives if not cost-effective – for example, reconstruction and elevation if the cost of repair exceeds a specified threshold. (d) make land-use decisions that reflect responsible and safe standards to reduce future natural hazard risks, e.g., by adopting or amending an open space management plan that reflects responsible floodplain and wetland management and takes into account continued sea level rise, if applicable, and (e) increase awareness of the hazards in their communities (including for members of protected classes, vulnerable populations, and underserved communities) through outreach to the MID areas.

**Example 1 (c):** The policy for the homeowner program requires all reconstructed homes to be built as raised, pier and beam units with a minimum elevation of 3' unless required by the jurisdiction to build higher. The program will not elevate slab on grade homes or allow dirt as a fill method for elevation.

The Program will consider elevations for properties located within the floodplain that are required to be elevated by local ordinance and the local code enforcement officials' determination that a property is substantially damaged or will be substantially improved. The Program will also consider elevations for properties outside of the floodplain which are required to be elevated by local ordinance as part of a reconstruction.

The Restore Homeowner Program policy specifically addresses feasibility and cost-effective measures relative to rehabilitation and reconstruction as follows:

*“If local code, ordinance, or code enforcement official requires elevation of a home and that home has a slab-on-grade foundation, the only option for assistance under the RLHP Hurricanes of 2020 Solution 1 Program will be reconstruction with elevation. The RLHP will not elevate slab-on-grade structures under Solution 1. Note: Dirt fill as an elevation method is not eligible under the RLHP and will not be funded under any Program solution.”*

*“If the relative percentage of RLHP damage is equal to or greater than 80% of the reconstruction amount, the reconstruction estimate is used to calculate the cost of reconstruction of the damaged structure.”*

**Example 2 (d):** The State offers voluntary buyouts through the existing MIT-funding LWI programs, as well as an option for eligible homes in the Restore Homeowner Program.

Buyouts most immediately provide a benefit to damaged property owners located in a floodways or other high-risk areas, as identified on a case-by-case basis, by providing them with the fair market value of their damaged property. Furthermore, the Buyout program improves the resilience of impacted communities by transforming high-risk parcels of land into wetlands, open space or storm water management systems, creating a natural buffer to safeguard against future storms.

Solution 4 option is limited to High-Risk Areas where properties are either ineligible for federal repair assistance (e.g. floodways and V-zones) or other high-risk areas, identified on a case-by-case basis in order to move residents out of harm’s way as well as use as a means to help facilitate the natural watershed improving local drainage. The Buyout component of Solution 4 is a voluntary real property acquisition Program.

Demolition and disposition of acquired property in the Solution 4 buyout program may occur only when the local jurisdiction (parish or municipality) where a buyout project is located provides a disposition plan and enters into an agreement to take ownership of the acquired property prior to the Program executing buyout project(s) in that area. Louisiana Land Trust (LLT), on behalf of OCD, will demolish any structures on properties undergoing buyouts, and remove impediments to drainage and/or retention from the site. The parish or municipality where a buyout project is located is responsible for the disposition and maintenance of the properties long-term. Property acquired through buyouts in this program may be disposed of in the following ways, subject to discretion of the Program in coordination with the parish or municipality:

1. Preservation by the state (note on this option: OCD will not preserve or own property)
2. Floodplain servitude granted in favor of the parish or other public entity in accordance with “Covenant and Compliance with Open Space Requirements” below Note: This option is only available in locations unsuitable for transfer, subject to the discretion of the Program
3. Retention and maintenance of the property by local jurisdiction or designee

The state is not required to purchase any property under this program, and preservation of buyout property under this program by the state is subject to review and approval by the state agency engaged in preservation. Any future uses of property acquired through this program will be subject to a deed restriction provided by the Program. The deed restriction shall not be amended by the local jurisdiction.

**Example 3 (e):** The Louisiana Office of Community Development administers the Restore Louisiana Buyout and Resilient Housing Incentive Program (Solution 4) with the goal of moving eligible residents out of harm's way and reducing future flood risk by creating a permanent open space that serves as a buffer against future storms and floods. The program is designed to give residents the flexibility to choose the best option for their individual situation. The state held numerous meetings with Pecan Acres residents to provide information on resettlement plans, provide awareness on future flood risks, and solicit feedback on proposed neighborhood layouts and housing designs.

## 3. GENERAL REQUIREMENTS

---

### A. CITIZEN PARTICIPATION.

#### Outreach and Engagement.

In the development of this disaster recovery Action Plan, the *Louisiana Office of Community Development-Disaster Recovery Unit* consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive, *listed below*:

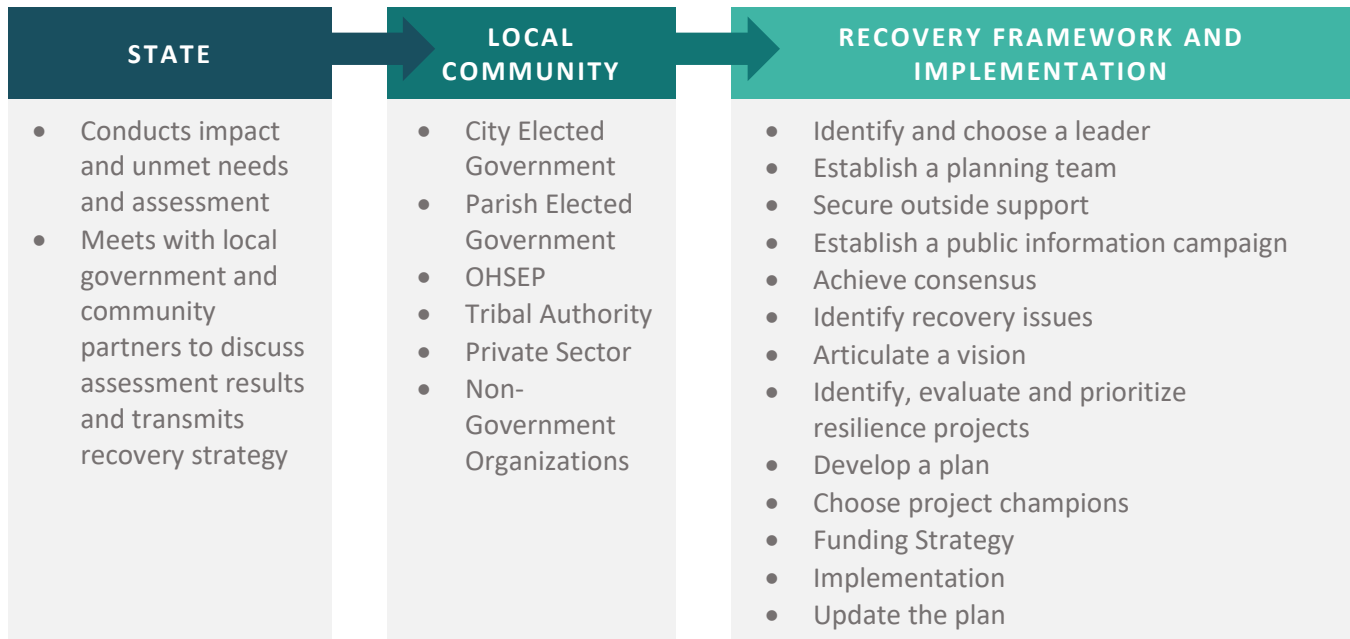
#### STATE AGENCIES

Originally in response to the Great Floods of 2016, the Long-Term Recovery Subcommittee (LTRS) was created as a subcommittee under the Unified Command Group (UCG) in August 2018 as part of the authority of the Louisiana Homeland Security and Emergency Assistance and Disaster Act (Louisiana Disaster Act) – Louisiana Revised Statute 29:725.6(v). The UCG is the state’s strategic decision-making body for emergency and disaster response and is comprised of members appointed by the Governor.

The subcommittee is dedicated to long-term recovery and sustainability and will be a key mechanism in implementing the State Hazard Mitigation Program (SHMP). The subcommittee is aligned with the ESF 14 State of Louisiana Disaster Recovery Framework and FEMA's National Disaster Recovery Framework. During EOC activation, the LTRS is convened alongside the UCG to assess recovery needs following a disaster, activate Recovery Support Functions (RSF) for complex recovery issues and develop post-disaster recovery strategies.

The subcommittee works to improve regulatory items set by state and federal legislation, recommend codified changes that will enhance recovery efforts, and effectively prepare for recovery. Developing a resilient Louisiana means that planning and policy must be measured against all hazards and throughout the entire emergency management cycle.





Through the NDRF and the LTRS, all six RSFs through their inter-coordination and 2021 work plan development, has included the active participation of all major state agencies as follows:

- Governor's Office of Homeland Security and Emergency Preparedness
- Louisiana Office of Community Development
- Louisiana Department of Agriculture and Forestry, or his designee.
- Louisiana Department of Wildlife and Fisheries, or his designee.
- Lieutenant Governor Office
- Louisiana Department of Children and Family Services
- Louisiana Department of Health
- Louisiana Department of Education
- Department of Transportation and Development
- Louisiana Housing Corporation
- Louisiana Economic Development
- Coastal Protection and Restoration Authority

Mission priorities and tasks to document need and available resources have included, but not been limited to:

- **RSF 1 – Planning and Capacity** conducted an assessment of local governmental jurisdiction using data available in the public domain and hurricane impact data to determine the level of ability for local jurisdictions to plan and execute a comprehensive recovery effort, given the existing implications of

COVID-19 on local budgets and the economy. This assessment has been vetted and coordinated through focus group meetings in cooperation with state agencies, the Louisiana Municipal Association; the Louisiana Police Jury Association; the State Chapters of the American Planning Association and the American Institute of Architects; the Louisiana Association of Planning Districts; and the eight Watershed Regions and other organizations. Additionally, RSF 1 is participating in the regular monthly meetings of the aforementioned organizations for mutual updates and further collaboration. This assessment is identifying short- and long-term needs – i.e. staffing and expertise gaps, training and technical assistance needed broadband and other technology issues, and funding gaps and resources which may be needed to sustain their operations.

- The state and FEMA conducted a new training curriculum - a Just-In-Time (JIT) Training – an ongoing series designed for and targeting local elected officials and their key recovery staff, to assist them in focusing, in real-time, on current issues of response and recovery at various intervals following the disasters. Modules were refined to address specific issues emanating from the disasters based on the type of staff participants and the impacted jurisdictions represented.
- The state’s “Long Term Resilience Planning Guide”, drafted after the 2016 Floods and implemented as a pilot resulting in two “best practices” to planning – the Ouachita Strong and the Denham Strong Plans -is being revised and updated to reflect the flood risk standards subsequently developed by the Watershed Initiative; guidance on planning regionally as opposed to an independent jurisdictional approach; the inclusion of the current mitigation approaches and the use of effective facilitation skills and the use of Zoom and other virtual and social media platforms to ensure inclusiveness in soliciting public input and a partnership with local residents.
- **RSF 2 – Economic Development**, under the leadership of the Louisiana Economic Development Department activated an emergency contract to assess damages to businesses and the local economy, covering physical damages to business, business interruption, loss of revenues to individual businesses, the agriculture economy, and state parks. This report is being circulated so that local and federal partners can develop appropriate programs and identify financial and technical resources to assist those businesses.
- **RSF 3 – Health & Human Services**, led by the Louisiana Department of Health, the Department of Children and Family Services, the Governor’s Office of Homeland Security and Emergency Preparedness, in partnership with local VOAD organizations and advocacy groups, developed a matrix of needs, including housing issues, which identified immediate health and emotional issues associated with the trauma of a storm and residential displacement, as well as long term, residual and psychological impacts, particularly in a COVID-19 environment. In addition, the impact of COVID-19 is complicating an already overburdened health care system.

- **RSF 4 – Housing** – Activated immediately due to the level of residences impacted, the Governor designated the Louisiana Housing Task Force, which was created in 2012 and activated after Hurricane Isaac and the Great Floods of 2016, to function as RSF 4-Housing. This body has been meeting weekly. Under the leadership of the HUD Field Office in New Orleans, HUD is conducting a HUD Housing Assessment through virtual Zoom interviews which will provide more insights into the housing situation on the ground and is inclusive of HUD owned properties, residential homeowners and rental properties and publicly owned properties, both land and facilities, which can be used to develop and expand the availability of affordable housing in the impacted area. Focus groups and targeted outreach in the field included the U.S. Department of the Treasury, the FDIC, local elected officials, local non-profits, local developers and citizens.
- **RSF 5 – Infrastructure & RSF 6 – Natural and Cultural Resources** – Both RSFs are working with their regional outreach teams in the field and local jurisdictions, in coordination with the FEMA PA team, to identify structural damage to roads, marshes, wetland, state parks, and historical sites.

Additionally, the state organized a consultation conference with affected public housing authorities to discuss the flood mitigation priorities and the use of 2020 and 2021 CDBG-DR and -MIT funds.

## INDIAN TRIBES

There are four federally recognized tribes in Louisiana - Chitimacha Tribe of Louisiana, Coshatta Tribe of Louisiana, Jena Band of Choctaw Indians, and the Tunica-Biloxi Indian Tribe. In addition, there are twelve state-recognized tribes in Louisiana, all of which fall under the auspices of The Tribal Affairs Office located in the Governor's Office. In consultation with the Tribal Affairs Office, OCD will hold meetings to communicate with and secure additional input and data on the impact of the 2020 and 2021 Hurricanes within their communities and to get feedback on the Action Plan in its entirety. Additionally, tribe representatives will be invited to participate in the Action Plan public hearings and meetings held in their respective regions. The prospective meeting date is listed below. Additional meetings will be scheduled upon request as necessary. The agenda and meeting minutes will be maintained as official record and as documentation of the consultative process.

**Stakeholder Conference Call with Native American Commission and Impacted Tribes:** March 14, 2022 (meeting was held in conjunction with the Virtual public meeting and in coordination with the State Tribal office)

## LOCAL GOVERNMENTS

The state has undergone a robust and ongoing dialogue across the state within the impacted communities for Hurricanes Laura and Delta, including a specific focus on consulting with stakeholders, particularly within the most impacted parishes.

A comprehensive list of all outreach efforts can be found in the **Attachments** section of this plan.

## FEDERAL PARTNERS

The state and the HUD Field Office in New Orleans worked closely together to compile information on impacted public housing authority properties in the 2020 and 2021 Hurricane impacted areas.

## NON-GOVERNMENTAL ORGANIZATIONS (NGOS) AND PRIVATE SECTOR

As a component of the state's comprehensive outreach, both NGOs and private sector stakeholders were invited to participate in relevant planning and briefing sessions. Additionally, the state VOAD, advocacy groups, and impacted private sector stakeholders will be notified of the Action Plan and corresponding public comment period via press release as described below.

Louisiana Office of Community Development-Disaster Recovery Unit recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input will be provided throughout the planning process through a public comment process that consists of a period for submitting comments on the Action Plan and substantial amendment criteria. These efforts include special consideration for those with limited English proficiency (LEP) and persons with disabilities. The Action Plan is translated into Spanish and Vietnamese to reach the LEP populations within grant-eligible areas. Citizens with disabilities or those who need technical assistance have been informed to contact the OCD office for assistance through several avenues made available by:

**Telephone, voice:** 225-219-9600 or LA Relay Service 711;

**Email:** [ocd@la.gov](mailto:ocd@la.gov); or

**Mail to:** Office of Community Development, Post Office Box 94095 Baton Rouge, LA, 70804-9095.

## EQUAL ACCESS TO INFORMATION

In addition to the activities above, the Louisiana Office of Community Development-Disaster Recovery Unit has published this action plan on <https://www.doa.la.gov/oa/ocd/> for a 30-day public comment period. Citizens will be notified through earned media as a press release will be sent statewide to all major print and broadcast outlets; stakeholder listservs; and traditional marketing outlets. Louisiana Office of Community Development-Disaster Recovery Unit will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of citizen comments on this Action Plan, along with Louisiana Office of Community Development-Disaster Recovery Unit responses, will be included in **Appendix C** of this document.

For more information, citizens can refer to the *Louisiana Office of Community Development-Disaster Recovery Unit* citizen participation plan that can be found at <https://www.doa.la.gov/oa/ocd/>.

## Public Hearings.

In line with the requirements noted in the Federal Register Notice for grantees receiving greater than \$500 million in CDBG- DR funding, the state is required to convene at least two public hearings in HUD-identified MID to solicit citizen comments. To comply with this requirement and to maximize citizen participation efforts, the state will hold five public hearings in different locations across the HUD-identified MID to provide reasonable opportunity, geographic balance, and maximum accessibility for citizen comment and ongoing citizen access to the use of grant funds. The public hearing dates are scheduled as listed below:

PUBLIC HEARING #	DATE	METHOD	MID LOCATION
Pre-Meeting #1	March 9, 2022	In-Person	Rapides Parish (Alexandria, LA)
Pre-Meeting #2	March 9, 2022	In-Person	Calcasieu Parish (Lake Charles, LA)
Pre-Meeting #3	March 14, 2022	Virtual	All
Pre-Meeting #4	March 16, 2022	In-Person	Caddo Parish (Shreveport, LA)
Pre-Meeting #5	March 16, 2022	In-Person	Ouachita Parish (Monroe, LA)
Public Hearing #1	April 7, 2022	In-Person	Calcasieu Parish (Lake Charles, LA)
Public Hearing #2	April 12, 2022	Virtual	All

The hearings will be held in facilities accessible to persons with disabilities with accommodation to ensure full participation opportunities. The hearings will also be streamed live for citizens to participate remotely, and each session will be recorded, and presentation materials will also be available online for reference. All virtual hearings will allow for real-time questions, with answers coming directly from the attending representatives to all attendees.

In accordance with the Federal Register Notice, the state will implement policies to ensure that all complaints, appeals, and grievances are addressed in a timely manner. For the purpose of this Action Plan, the state has defined complaints and appeals as follows:

## Complaints

A complaint is defined as a written or verbal statement or grievance that a situation or behavior is unsatisfactory or unacceptable: (1) A Fair Housing or other discriminatory allegation; (2) An allegation of fraud, waste or abuse; and/or communication of dissatisfaction of a program and/or personnel.

There are two types of complaints; formal and informal.

- Formal complaints are written statements of grievance, including faxed and emailed statements. A written procedure for dealing with formal complaints is required and will be detailed in program policies.
- Informal complaints may be verbal and can come from any party involved in the application process, including the homeowner or building contractor. A written procedure for handling these complaints is not required.

Citizens will be provided with the address, phone numbers, and times for submitting complaints or grievances. A complaint tracking system will categorize complaints, track the resolution process, and report on complaint status.

Information about the right and how to file a complaint will be printed on all program applications, guidelines, and subrecipient websites in all local languages, as appropriate and reasonable.

Complaints will be handled sensitively and fairly. A thorough review of any applicable program documentation and contractual agreements will be conducted, as well as careful implementation of policies and procedures, and clear and respectful methods of communication will be used to help prevent and resolve complaints. Corrective action is implemented, where warranted and responses to complaints will be provided within fifteen (15) working days within receipt of the complaint.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)). Louisiana *Office of Community Development - Disaster Recovery Unit* will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://www.doa.la.gov/doa/ocd/> to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

## APPEALS

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

funding requirements. Policies that have been approved and incorporated by a program, statutory and regulatory requirements/guidelines may not be appealed.

The state will implement an appeals process for homeowners, rental property owners, and small business owners related to program eligibility and program application process. Details of the point of contact and procedure for submitting the appeal will be detailed in the appropriate program policies and procedures.

## B. PUBLIC WEBSITE

Louisiana Office of Community Development-Disaster Recovery Unit will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through <https://www.doa.la.gov/doa/ocd/>. Specifically, Louisiana Office of Community Development-Disaster Recovery Unit will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

The state will make all documents available in a form accessible to persons with disabilities and limited English proficiency, including translations in both Spanish and Vietnamese as well as other languages upon request. In addition, Louisiana Office of Community Development-Disaster Recovery Unit will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. This website will include specific information on how to join electronic distribution lists for respective programs.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

## C. AMENDMENTS

Over time, recovery needs will change. Thus, the Louisiana Office of Community Development-Disaster Recovery Unit will amend the disaster recovery action plan as often as necessary to best address our long-term recovery

needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

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

## Substantial Amendment

A change to this action plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity, or
- The allocation or reallocation of the greater of either a re-allocation of more than \$5 million dollars or a reallocation which constitutes a change of 15 percent or greater of a program budget.

When Louisiana Office of Community Development-Disaster Recovery Unit pursues the substantial amendment process, the amendment will be posted here at <https://www.doa.la.gov/doa/ocd/> for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. Louisiana Office of Community Development-Disaster Recovery Unit will review and respond to all public comments received and submit to HUD for approval.

## Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. Louisiana Office of Community Development-Disaster Recovery Unit will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

## D. DISPLACEMENT OF PERSONS AND OTHER ENTITIES

To minimize the displacement of individuals, families, businesses, farms, and nonprofit organizations that may be affected by the activities outlined in this action plan, Louisiana Office of Community Development-Disaster Recovery Unit will coordinate with all agencies and entities necessary to ensure that all programs are



administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and the implementing regulations at 24 CFR Part 570.496(a) to minimize displacement. Displacement policies and procedures apply to both property owners and renters. Should any proposed projects or activities cause the displacement of people, the appropriate policies will be adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

CDBG-DR funds may not be used to support any federal, state, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. None of the currently planned projects under this Action Plan contemplate use of eminent domain.

## E. PROTECTION OF PEOPLE AND PROPERTY

The State of Louisiana intends to promote high quality, durable, energy-efficient, sustainable, and mold-resistant construction methods in areas impacted by the disaster. All newly constructed buildings must meet all locally adopted building codes, standards, and ordinances. In the absence of locally adopted and enforced building codes, the requirements of the State Building Code will apply. Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

### Elevation standards

New construction, repair of substantially damaged structures, or substantial improvement to structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain, requires the structure to be elevated with the lowest floor, including the basement, at least two (2) feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents below two (2) feet above base flood elevation must be elevated or flood proofed up to at least two (2) feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three (3) feet above the 100-year floodplain.

The state will—at a minimum—adhere to the advanced elevation requirements established in section II.B.2.c. of the Federal Register Notice, subtitled “Elevation standards for new construction, reconstruction and rehabilitation of substantial damage, or rehabilitation resulting in substantial improvements.” To this effect, future property

damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations. As applicable and within its policies and procedures on a program-by-program basis, the state or its sub-grantees will document decisions to elevate structures. This documentation will address how projects will be evaluated and how elevation costs will be reasonably determined relative to other alternatives or strategies, such as the demolition of substantially damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to reduce the risk of loss of life and property.

The average cost to elevate a home can vary significantly and is dependent upon the number of feet it must be elevated, the location of the home, and the square footage of the home. It is estimated that the cost to elevate a home in Louisiana may be between \$30,000 and \$100,000 based on the factors mentioned above.

Non-residential structures, including infrastructure, will be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3( c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or one percent annual chance) floodplain. All Critical Actions as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual change) floodplain will be elevated or floodproofed (in accordance with FEMA floodproofing standard at 44 CFR 60.3( c)(2)-(3) or successor standard) to the higher of the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure will be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Activities subject to elevation requirements will comply with applicable federal accessibility mandates. The state and its subrecipients will comply with applicable state, local and tribal codes and standards for floodplain management including elevation, setbacks, and cumulative substantial damage requirements.

When CDBG-DR funds are used for the non-federal match requirement on Public Assistance projects, the alternative requirements of Section III.F.6 of the Notice will be utilized where allowed by the Notice.

## Flood Insurance Requirements

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). Louisiana Office of Community Development-Disaster Recovery Unit may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and when that person has failed to obtain or allowed their flood insurance to lapse for the property. Louisiana Office of Community Development-Disaster Recovery Unit is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120 percent AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance, they may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120 percent AMI or the national median and has unmet recovery needs.

## Construction Standards

Louisiana Office of Community Development-Disaster Recovery Unit will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction will meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

Substantially damaged structure means a structure in a Special Flood Hazard Area – or floodplain – for which the total cost of repairs is 50 percent or more of the structure's market value before the disaster occurred, regardless of the cause of damage. Substantially damaged structures, as determined by the local jurisdiction's floodplain manager, may require additional construction considerations.

For rehabilitation of non-substantially damaged residential buildings, Louisiana Office of Community Development-Disaster Recovery Unit will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation

work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, Louisiana Office of Community Development-Disaster Recovery Unit will encourage, to the extent practicable, implementation of sustainable planning, and design methods that promote adaptation and resilience.

All projects will be subject to cost reasonableness standards as outlined in the policies and procedures of the applicable program specific to the applicable activity.

The following information provides examples of current policy related to the current OCD mitigation and Flood 2016 grant. These policies are examples that address: (c) establish and support recovery efforts by funding feasible, cost-effective measures that will make communities more resilient against a future disaster. Currently, the Action Plan maintains that the state's policies and procedures will address the assessment of cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation, reconstruction program, or activity funded with CDBG-DR funds. Policies and procedures will also address possible alternatives if not cost-effective – for example, reconstruction and elevation if the cost of repair exceeds a specified threshold. (d) make land-use decisions that reflect responsible and safe standards to reduce future natural hazard risks, e.g., by adopting or amending an open space management plan that reflects responsible floodplain and wetland management and takes into account continued sea level rise, if applicable, and (e) increase awareness of the hazards in their communities (including for members of protected classes, vulnerable populations, and underserved communities) through outreach to the MID areas.

**Example 1 (c):** The policy for the homeowner program requires all reconstructed homes to be built as raised, pier and beam units with a minimum elevation of 3' unless required by the jurisdiction to build higher. The program will not elevate slab on grade homes or allow dirt as a fill method for elevation.

The Program will consider elevations for properties located within the floodplain that are required to be elevated by local ordinance and the local code enforcement officials' determination that a property is substantially damaged or will be substantially improved. The Program will also consider elevations for properties outside of the floodplain which are required to be elevated by local ordinance as part of a reconstruction.

The Restore Homeowner Program policy specifically addresses feasibility and cost-effective measures relative to rehabilitation and reconstruction as follows:

***“If local code, ordinance, or code enforcement official requires elevation of a home and that home has a slab-on-grade foundation, the only option for assistance under the RLHP Hurricanes of 2020 Solution 1 Program will***

*be reconstruction with elevation. The RLHP will not elevate slab-on-grade structures under Solution 1. Note: Dirt fill as an elevation method is not eligible under the RLHP and will not be funded under any Program solution.”*

*“If the relative percentage of RLHP damage is equal to or greater than 80% of the reconstruction amount, the reconstruction estimate is used to calculate the cost of reconstruction of the damaged structure.”*

**Example 2 (d):** The State offers voluntary buyouts through the existing MIT-funding LWI programs, as well as an option for eligible homes in the Restore Homeowner Program.

Buyouts most immediately provide a benefit to damaged property owners located in a floodways or other high-risk areas, as identified on a case-by-case basis, by providing them with the fair market value of their damaged property. Furthermore, the Buyout program improves the resilience of impacted communities by transforming high-risk parcels of land into wetlands, open space or storm water management systems, creating a natural buffer to safeguard against future storms.

Solution 4 option is limited to High-Risk Areas where properties are either ineligible for federal repair assistance (e.g. floodways and V-zones) or other high-risk areas, identified on a case-by-case basis in order to move residents out of harm’s way as well as use as a means to help facilitate the natural watershed improving local drainage. The Buyout component of Solution 4 is a voluntary real property acquisition Program.

Demolition and disposition of acquired property in the Solution 4 buyout program may occur only when the local jurisdiction (parish or municipality) where a buyout project is located provides a disposition plan and enters into an agreement to take ownership of the acquired property prior to the Program executing buyout project(s) in that area. Louisiana Land Trust (LLT), on behalf of OCD, will demolish any structures on properties undergoing buyouts, and remove impediments to drainage and/or retention from the site. The parish or municipality where a buyout project is located is responsible for the disposition and maintenance of the properties long-term. Property acquired through buyouts in this program may be disposed of in the following ways, subject to discretion of the Program in coordination with the parish or municipality:

1. Preservation by the state (note on this option: OCD will not preserve or own property)
2. Floodplain servitude granted in favor of the parish or other public entity in accordance with “Covenant and Compliance with Open Space Requirements” below Note: This option is only available in locations unsuitable for transfer, subject to the discretion of the Program
3. Retention and maintenance of the property by local jurisdiction or designee

The state is not required to purchase any property under this program, and preservation of buyout property under this program by the state is subject to review and approval by the state agency engaged in preservation.

Any future uses of property acquired through this program will be subject to a deed restriction provided by the Program. The deed restriction shall not be amended by the local jurisdiction.

**Example 3 (e):** The Louisiana Office of Community Development administers the Restore Louisiana Buyout and Resilient Housing Incentive Program (Solution 4) with the goal of moving eligible residents out of harm’s way and reducing future flood risk by creating a permanent open space that serves as a buffer against future storms and floods. The program is designed to give residents the flexibility to choose the best option for their individual situation. The state held numerous meetings with Pecan Acres residents to provide information on resettlement plans, provide awareness on future flood risks, and solicit feedback on proposed neighborhood layouts and housing designs.

## Contractors Standards

Contractors selected under Louisiana Office of Community Development-Disaster Recovery Unit will make every effort to provide opportunities to low- and- very low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. Grantees may elaborate on specific steps to promote Section 3. Louisiana Office of Community Development-Disaster Recovery Unit will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Recovery programs implemented by the State of Louisiana will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to carry required licenses, insurance coverage(s) for all work performed, and state-contracted contractors will be required to provide a warranty period for all work performed. Contractor standards will be enumerated for each program (e.g., homeowners and rental property owners) in respective policies and procedures documents, and will pertain to the scale and type of work being performed, including the controls for assuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through a Louisiana Office of Community Development-Disaster Recovery Unit administered program described in this Action Plan may be appealed by homeowners or small business owners (as applicable) whose property was repaired by contractors under the state’s control. Appeals must comply with the policies and procedures of the specific program under which the homeowner or business owner’s property was rehabilitated. Additional appeals information is contained in the “Complaints” section of this Action Plan.

The State of Louisiana intends to promote high quality, durable and energy efficient construction methods in affected parishes. All newly constructed buildings must meet all locally adopted building codes, standards and ordinances as evidenced by final certificate of occupancy. In the absence of locally adopted and enforced building codes that are more restrictive than the state building code, the requirements of the State Building Code will

apply. Future property damage will be minimized by incorporating resilience standards through requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

## Preparedness, Mitigation, and Resiliency

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

The state will leverage other federal and non-federal funding sources related to mitigation efforts, as well as incorporate best practices from projects, data collection, modeling, and policy measures associated with the use of \$1.2 billion in funds described in its Community Development Block Grant-Mitigation (CDBG-MIT) Action Plan, further advancing the Louisiana Watershed Initiative's long-term resilience goals and objectives. See, <https://watershed.la.gov/action-plan>.

In May 2018, Gov. Edwards issued Executive Order JBE18-16, creating the Council on Watershed Management, which serves as the state's multi-pronged approach to mitigating future flood risk and expanding resilient development patterns while focusing on natural boundaries. This initiative represents a continuation and extension of the planning, coordination, and collaboration across various federal, state, and local agencies in direct response to the historic flooding events of March and August 2016.

The LWI has identified eight watershed districts, each with a funded fiscal agent, which have created regional steering committees, representative of the demographics, parishes, and local jurisdictions within each watershed to ensure inclusivity at all levels of decision making. These steering committees have analyzed their local flood risks, identified shared priorities and long-term governance needs, and will establish long-term management protocols and prioritize regional risk reduction project investments.

### ADDITIONAL CONSIDERATIONS

In addition to the efforts described above, the state of Louisiana also considers and incorporates the following established planning initiatives as it responds to the impact and unmet needs of 2020 and 2021 Hurricanes.

- The Flood Recovery Strategy emanating from the National Disaster Recovery Framework (NDRF)
- Local Advisory Base Flood Elevations (BFEs) and Flood Insurance Rate Maps (FIRMs);
- State adoption of National Building Code Standards
- The parish Hazard Mitigation Plan required by GOSHEP and the revised 2019 State Mitigation Plan
- Local Long-Term Recovery Resilience Plans (ESF-14)
- An assessment of local land use plans, zoning and floodplain management ordinances and permit requirements

- The Master Plan of the CPRA (as applicable); and
- Regional coordination with the Louisiana Association of Planning Districts (LAPD)

### *Mitigation Needs Assessment*

In accordance with HUD guidance, the state of Louisiana completed the following Mitigation Needs Assessment. The state consulted with GOSHEP and DOTD Floodplain Management Office and reviewed existing hazard plans, and the CDBG-MIT Action Plan approved by HUD on February 20, 2020, to develop a multi-hazard risk-based MIT Needs Assessment. This assessment informs and provides a substantive basis for programs proposed in this Action Plan, with a focus on addressing and analyzing all significant current and future hazard risks.

This mitigation needs assessment analyzes statewide risks with specific sections detailing particular hazards in the most impacted areas.

There have been 90 major disaster declarations in the state of Louisiana since 1954. The most common natural disasters that cause damages to an extent that results in a federal disaster declaration are hurricanes and flooding. Since 2000, there have been 22 declared flood and hurricane-related disasters<sup>2</sup>. This historical pattern of extreme weather is expected to continue and become more severe due to climate change. Based on this, mitigation measures to reduce impacts caused by these types of hazards are critical.

Every parish in the state has been impacted by one or more of these events and has resulted in the devastating loss of life and hardship to Louisiana residents, forcing many to relocate, exhaust their financial assets and undermine the security of living in their homes or investing in their properties or businesses<sup>3</sup>.

Repetitive and severe repetitive flood loss properties are particularly costly with claims totaling over \$2 billion in Louisiana since 1978. It is important to note that repetitive flood loss properties represent only 1.3 percent of all flood insurance policies but historically account for nearly one-fourth of the claim payments<sup>4</sup>. Mitigating repetitive loss properties in Louisiana and preventing the future accrual of additional repetitive loss properties benefits not only the state of Louisiana but the entire country, by contributing to the stability of the NFIP.

---

<sup>2</sup> JE Lamond, RD Joseph, and DG Proverbs. "An Exploration of Factors Affecting the Long-Term Psychological Impact and Deterioration of Mental Health in Flooded Households." *Environmental Research*, July 2015; 140:325-34.

<sup>3</sup> GOHSEP. "Repetitive Loss Strategy" (Appendix to the 2019 State of Louisiana Hazard Mitigation Guide).

<sup>4</sup> NOAA. Billion-Dollar Weather and Climate Disasters: Events



## COST OF DISASTERS

Between 1980 and 2021, 84-billion-dollar disaster events, totaling more than \$940 Billion dollars, a result of 23 Tropical Cyclone, 10 Flooding, 30 Severe Storm, 8 Winter Storm, 12 Drought, and 1 Freeze events, affected Louisiana (CPI-adjusted). Louisiana ranks among the costliest states for weather and climate disasters compared to other states affected by billion-dollar events (this summation does not include losses less than a billion dollars). An overview of Louisiana’s billion-dollar events is provided in the table below<sup>4</sup>.

**TABLE: BILLION-DOLLAR EVENTS TO AFFECT LOUISIANA FROM 1980 TO 2021 (CPI-ADJUSTED)**

DISASTER TYPE	EVENTS	EVENTS/ YEAR	PERCENT FREQUENCY	TOTAL COSTS	PERCENT OF TOTAL COSTS
Tropical Cyclone	23	0.6	28.2%	\$200.0B-\$230.0B <sup>†</sup>	86.7%
Flooding	10	0.2	11.8%	\$10.0B-\$20.0B	7.1%
Severe Storm	30	0.7	35.3%	\$5.0B-\$10.0B	3.7%
Drought	12	0.3	14.1%	\$2.0B-\$5.0B	1.7%
Winter Storm	8	0.2	9.4%	\$1.0B-\$2.0B	0.7%
Freeze	1	0.0	1.2%	\$100M-\$250M	0.1%
All Disasters	84	2.0	100%	\$200.0B-\$270.0B	100.0%

Louisiana is also facing coastal land loss which proposes a risk to businesses, homes, infrastructure as well as larger economic implications due to the state’s importance in shipping, energy production, chemicals, and other sectors. The five most heavily impacted regions in Louisiana are highlighted in the table below. The lost economic assets are heavily concentrated in the coastal regions facing more significant rates of land loss. The business disruption costs are distributed more evenly across the coast<sup>5</sup>.

**TABLE: THE US TOTAL REPRESENTS THE TOTAL DAMAGES IN BOTH LOUISIANA AND THE COUNTRY FROM LAND LOSS IN LOUISIANA. ALL FIGURES IN 2015 DOLLARS.**

REGION	INFRASTRUCTURE REPLACEMENT COSTS	BUSINESS DISRUPTIONS
United States Total	\$3.6 billion	\$7.6 billion

<sup>5</sup> LSU, Economics & Policy Research Group. Regional Impacts of Coastal Land Loss and Louisiana’s Opportunity for Growth

REGION	INFRASTRUCTURE REPLACEMENT COSTS	BUSINESS DISRUPTIONS
New Orleans	\$1.7 billion	\$1.7 billion
Baton Rouge	\$60 million	\$600 million
Houma	\$1.4 billion	\$1.4 billion
Lafayette	\$140 million	\$390 million
Lake Charles	\$420 million	\$490 million

### *National Flood Insurance Program*

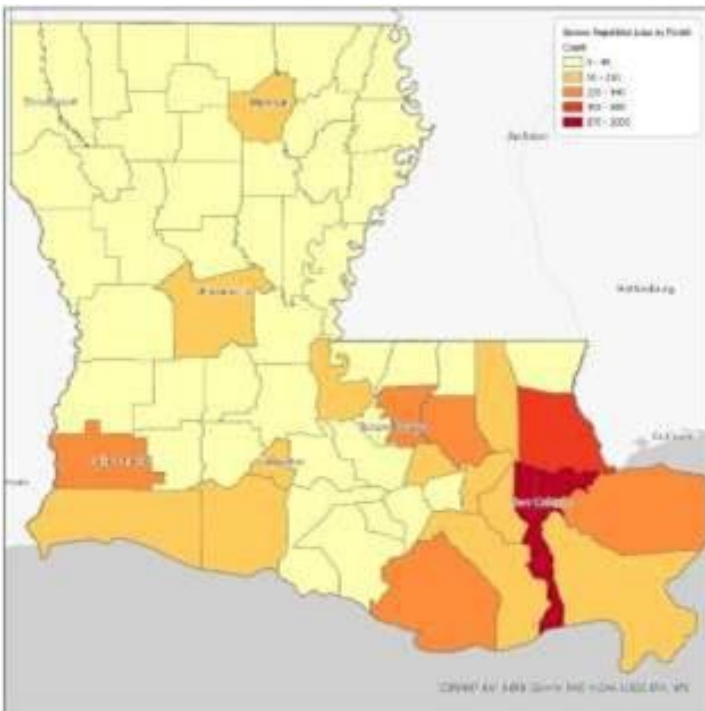
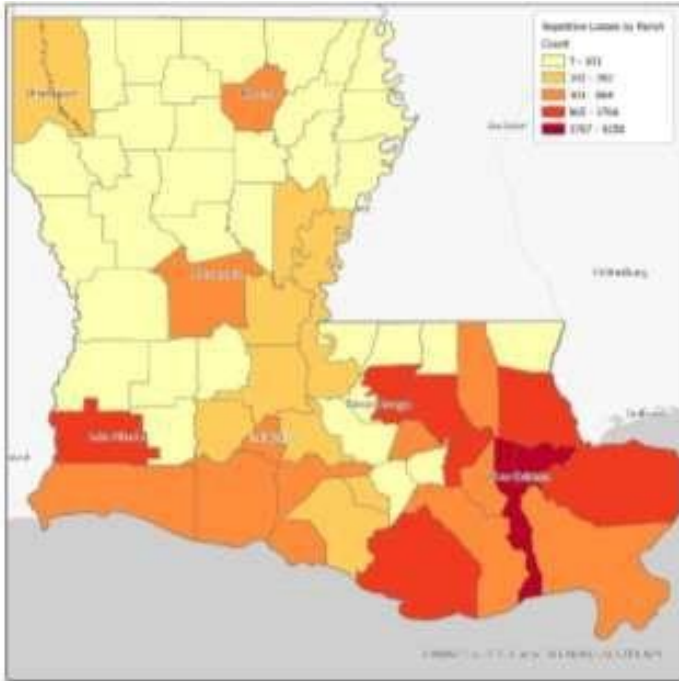
Flooding is a problem for many people across the United States. Enduring the consequences of repetitive flooding can put a strain on residents and on state and local resources. When the water rises, communities face the disruption of life, damaged belongings, and the high cost of rebuilding. FEMA administers the National Flood Insurance Program, which pays flood claims, while also keeping the price of flood insurance at an affordable level. All parishes in the state of Louisiana participate in the NFIP. As of October 2021, there were 507,929 NFIP policies in force across the state.

### *Repetitive and Severe Repetitive Flood Loss*

Repetitive and severe repetitive flood loss properties are particularly costly, with claims since 1978 reaching approximately \$13 billion nationwide, and over \$2 billion in Louisiana. Repetitive flood loss properties represent only 1.3 percent of all flood insurance policies, yet historically they account for nearly one-fourth of the claim payments. Mitigating these repeatedly flooded properties reduces the overall costs to the NFIP, the communities in which they are located, and the individual homeowners. Therefore, mitigating repeatedly flooded properties benefits the entire state.

As of October 2021, there are 32,791 repetitive loss properties (an additional 7,269 properties from September 2018) and 8,055 severe repetitive loss properties (a change of 6,067 from September 2018) in the state of Louisiana.

The figures below help demonstrate the distribution of repetitive loss and severe repetitive loss properties (respectively) across the state. Orleans, Jefferson, and St. Tammany parishes (along with the cities in the parishes) have the highest number of repetitive and severe repetitive loss properties. The majority of repetitive loss properties are clustered in the southern part of the state. The largest concentrations of repetitive loss properties in the state occur in the heavily populated areas of the coastal region. In the central parishes, repetitive loss properties occur in urban areas. In the northern part of the state, there are also repetitive losses in urban areas, but the majority of the parishes in the northern region have relatively low numbers of repetitive losses.



Like repetitive loss properties, the majority of severe repetitive loss properties are in the southern part of the state. The largest concentrations of severe repetitive loss properties in the state occur in the heavily populated

areas of the coastal region. In the central parishes, severe repetitive loss properties occur in urban areas. In the northern part of the state, there are also severe repetitive losses in urban areas, but the majority of the parishes in the northern region have comparatively low numbers of severe repetitive losses.

With support from the State, the municipalities in Louisiana are working to mitigate their repetitive flood losses. As of 2021, A total of 22 percent of the Repetitive Loss properties in Louisiana have been mitigated. The parishes with the highest number of mitigated properties are Jefferson and Orleans, followed by Terrebonne, St. Tammany, and St. Bernard.

### *Cost of Future Risks*

To assess future risk, the SHMP utilizes a planning time horizon of 25 years (from a 2017 baseline) and calculates potential impacts of natural hazards in the year 2043. Illustrated in the table below, 2043 annual wind-related losses are the highest projected average in the state, equal to \$642,927,351. Flood-related losses are ranked as the second-highest projected annual loss, equal to \$451,389,758 should a 1 percent annual exceedance probability flood event (AEP) occur. Expansive soils are identified as the third most costly projected annual loss, equal to \$92,869,675.

Despite the state’s extensive efforts to mitigate flood risks following hurricanes Katrina, Rita, Gustav, Ike, Isaac, and the Great Floods of 2016, as well as through long-term efforts like the Coastal Master Plan, losses attributable to a 1 percent AEP flood event will account for more than one-third of all anticipated disaster losses in 2043<sup>6</sup>. Moreover, given the state’s recent history of federally- declared disaster events attributable to a significant flood – many of which were measured to be well in excess of a 1 percent AEP event – this assessment contends the SHMP loss estimate of

\$451,389,758 significantly undervalues the state’s long-term flood damage risk.

**TABLE: SHMP 2043 PROJECTED ANNUAL LOSSES AS A RESULT**

PROJECTED AVERAGE ANNUAL LOSS IN 2043	BUILDING AVERAGE ANNUAL LOSS	CROP AVERAGE ANNUAL LOSS	TOTAL AVERAGE ANNUAL LOSS
Wind	\$642,927,351		\$642,927,351
Flood	\$451,389,758		\$451,389,758 - 1% AEP
Expansive Soil	\$92,869,675		\$92,869,675
Drought	\$-	\$52,795,132	\$52,795,132
Extreme cold	\$36,978,826	\$1,155,889	\$38,134,715

PROJECTED AVERAGE ANNUAL LOSS IN 2043	BUILDING AVERAGE ANNUAL LOSS	CROP AVERAGE ANNUAL LOSS	TOTAL AVERAGE ANNUAL LOSS
Tornado	\$31,725,662	\$281,804	\$32,007,466
Wildfire	\$5,876,211		\$5,876,211
Lightning	\$2,917,407	\$3,483	\$2,920,890
Hail	\$1,976,212	\$110,057	\$2,086,269
Dam Failure	\$1,011,414		\$1,011,414
Extreme Heat	\$-	\$744,345	\$744,345
Sinkhole	\$342,071		\$342,071

<sup>6</sup> Ibid.

### *Greatest Risk Hazards*

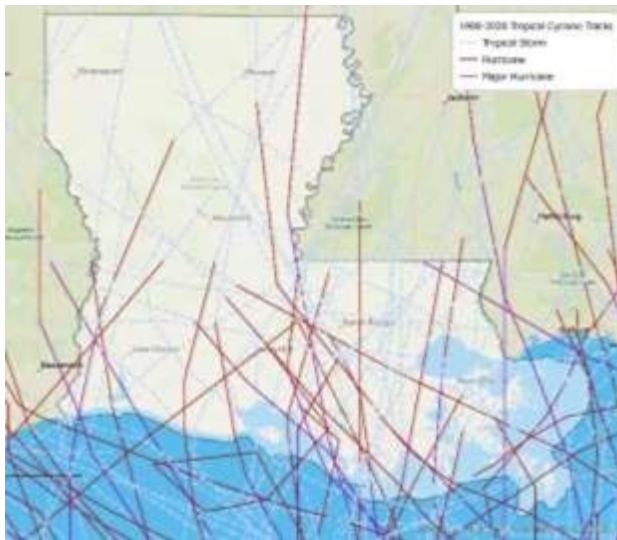
The Louisiana GOHSEP Hazard Identification and Risk Assessment (2018 HIRA) ranks local floods as the highest risk to the state based on consideration of consequence, vulnerability, threat, and risk factors. This threat is followed closely by severe thunderstorms, wide-area floods, tornados, and hurricanes. Based on the SHMP and local hazard mitigation plans, both HUD and LA MID areas share a collective greatest risk profile that includes wind and flood hazards, which are compounded by the effects of subsidence and sea-level rise. This section addresses quantitative and qualitative descriptions of these hazards and their projected current and future risk to MID areas and the State of Louisiana.

### *Hurricanes/Tropical Cyclones*

Tropical cyclones are spinning, low-pressure storms that draw surface low-latitude air into their centers and attain strength, ranging from weak tropical waves to the most intense hurricanes. Major hurricanes are classified as Category 3 to 5 based on the Saffir-Simpson Hurricane Wind Scale.

Tropical cyclones produce dangerous conditions due to flooding, high winds, and storm surge. Rainfall can cause ravine flooding and flash floods, creating dangerous conditions for residents and first responders. High wind speeds are typical with tropical cyclones, even resulting in tornadoes, which can damage homes and critical infrastructure (especially the above-ground electrical grid). Storm surge is an increase in water height caused by strong winds, often associated with a hurricane that produces vertical circulation below the water surface and elevates the water height. When a storm approaches land and encounters shallower water, the water piles up to a greater height. Combined with sea-level rise, the impacts of storm surge are felt farther inland, affecting communities that were once protected by surrounding wetlands that have now been lost.

Data from 1900 to 2020 depicted in the figure below, show that the entire state has been impacted by tropical cyclones, often significantly.



*Figure: Tropical Cyclone Tracks Across Louisiana (1900-2020)*

Louisiana will always be in a geographic position where tropical cyclones are likely to occur. Any increased intensities in the future are likely to exacerbate Louisiana’s future vulnerability, given that intense storms have enormous potential to devastate the physical, urban, agricultural, economic, and sociocultural infrastructure of the state. The SHMP projects a 25 percent increase in the future vulnerability to tropical cyclones.

### *Floods*

A flood is the overflow of water onto land that is typically not inundated. Excess precipitation, produced from thunderstorms or hurricanes, is often the major initiating condition for flooding, and Louisiana can have high rainfall totals at any time of the day or year. The SHMP indicates five specific types of floods that are of main concern: riverine, flash, ponding, backwater, and urban. The 1 percent AEP flood is used as the basis for regulatory standards, such as building codes and flood insurance requirements, and represents the baseline for the SHMP evaluation.

The flood hazard area is defined as the land area that has a 1 percent chance of flooding per year; however, this is not a complete picture of flood risk because flood inundation boundaries delineating other flood-related risks are not systematically defined.

While projected changes for riverine flooding are still being developed through the Louisiana Water Initiative’s watershed monitoring, mapping and modeling program, the CPRA modeling predicts increases in coastal flooding illustrated in the figure below which captures a medium environmental scenario with no mitigation action in 2043

with the current 100-year flood depths. This map represents the flood hazard we could expect to see in the year 2043. The figure below provides a more detailed coastal flood risk projection for 2067 if no action is taken. As noted in NCA4 (2017), projection of the flood hazard to 2050 is a complex multivariate problem, as human activities such as deforestation, urban and floodplain development, construction of dams, flood mitigation measures, and changes in agricultural practices impact future flood statistics.

In addition, Louisiana’s geography superimposes a highly responsive local-to-regional-scale on similar changes upstream over a significant portion of the nation, and these changes are superimposed on climatic changes and eustatic sea-level rise.



*Figure: 100-Year Flood Inundation Area in Louisiana*

Despite the fact that these complications invite caution in the interpretation of results, it is safe to conclude that flood is likely to remain HUD and LA MID’s and the entire 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.

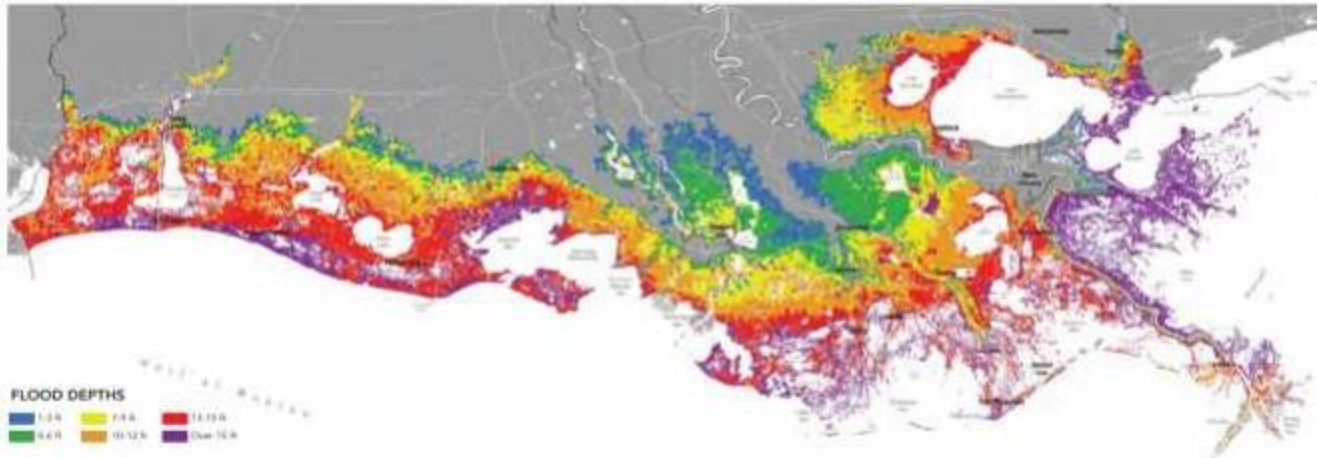


Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action

Source: [http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan\\_Web-Book\\_CFinal-with-Effective-Date-06092017.pdf](http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_CFinal-with-Effective-Date-06092017.pdf)

### Sea Level Rise

Due to a variety of factors including eustatic sea-level rise, subsidence, and coastal land loss, Louisiana has one of the highest sea-level rise rates in the world<sup>6</sup>. This steadily increasing threat further exacerbates flood risk within the state, as it multiplies the potential impacts of any isolated flood event and contributes to an ever-worsening baseline state of flood risk exposure<sup>7</sup>.

As sea-level rise impacts the coastal areas of Louisiana, it also weakens the existing network of wetlands, barrier islands, and brackish estuaries that provide critical storm protection and flood retention natural functions to more inland portions of the state. The figure below indicates potential flood risk as a result of sea-level rise projected in 2067 if the state were to take no action.

Some of Louisiana's recent mitigation efforts (namely LA SAFE and actions of the CPRA) have identified inland migration and the restoration of coastal areas as methods to address the insidious threat of sea-level rise; however, increasing sea-level rise will continue to present a threat to Louisiana, especially as it exacerbates flood risk.

<sup>6</sup> LA GOHSEP, 2019. "Repetitive Loss Strategy" – Appendix to the 2019 State of Louisiana Hazard Mitigation Plan Update.

<sup>7</sup> GOHSEP, 2018. Hazard Identification and Risk Assessment.



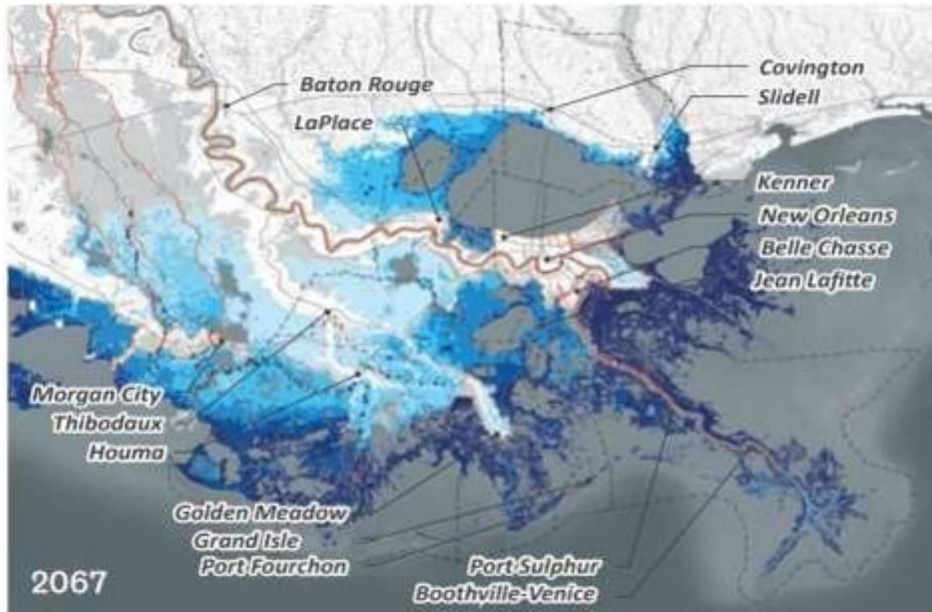


Figure: 2067 Coastal Flood Risk Projections (No Action)

Source: <https://s3.amazonaws.com/lasafe/Final+Adaptation+Strategies/Regional+Adaptation+Strategy.pdf>

### *Extreme Precipitation*

Extreme precipitation precedes flash flooding, which is a critical component of Louisiana’s risk profile<sup>8</sup> and can occur with little warning, exhausting municipal resources and causing repeated property damage and business interruption.

Louisiana experiences some of the highest rainfall rates in the country on an average statewide basis, with a high degree of spatial variability<sup>9</sup>, with some areas in the state reaching as high as 70- inches of mean annual rainfall. Even in drought or La Niña conditions,

Louisiana is often subject to high water levels in its major riverine systems, due to flooding conditions upstream in the Midwest<sup>10</sup> that can pose an elevated threat when combined with extreme precipitation or wind events.

<sup>8</sup> GOHSEP. State of Louisiana Hazard Mitigation Guide. 2019

<sup>9</sup> Linda Benedict and John M. ‘Jay’ Grimes, III. “Precipitation Patterns Over the Bayou State.” 11/30/2011.

<sup>10</sup> R. Frankson, K. Kunkel, and S. Champion. Louisiana State Climate Summary. NOAA Technical Report NESDIS 149-LA, 4 (2017)

Because of its flat landscape and interconnected waterways, the impact of a rainfall event in one part of the state can be greatly felt far beyond the boundaries of where the rain falls.



*Figure: Louisiana Average Annual Rainfall Distribution*

Louisiana has experienced a number of historic storms and rainfall events with high damage levels in the past two decades, but these events are not outliers from a historical perspective. In fact, such events may speak to existing trends in rainfall data and flood risk. Since 1958, the amount of precipitation falling during heavy rainstorms has increased by 27 percent in the southeast, and the trend toward increasingly heavy and frequent rainstorms, including a significant increase in extreme precipitation events, is projected to continue with high confidence<sup>11</sup>. Moreover, the amount of rainfall in the Midwest is also likely to increase, which could worsen flooding in Louisiana, as most of the Midwest drains into the Mississippi River.

## Broadband Infrastructure in Housing

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

---

<sup>11</sup> United States Global Change Research Program. Climate Science Special Report: Fourth National Climate Assessment, Volume

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible;
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Any new construction or substantial rehabilitation of a building with more than four rental units must include installation of broadband infrastructure, with the following exceptions:

- The location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible;
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of a program or activity or in an undue financial burden; or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

The state will require the review for the feasibility of implementing the requisite broadband infrastructure in the plans and specifications approval process and will perform on-site inspections during construction and post construction to ensure compliance, where applicable.

## Cost-Effectiveness

The state's policies and procedures will address the assessment of cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation, reconstruction program, or activity funded with CDBG-DR funds. Policies and procedures will also address possible alternatives if not cost-effective – for example, reconstruction and elevation if the cost of repair exceeds a specified threshold. Similarly, the policies and procedures will address provisions required by the Notice, such as "not suitable for rehabilitation" in connection with the waiver of one for one replacement obligations and definition of "demonstrable hardship."

The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as, reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

All exceptions to maximum award limitations are subject to grant fund availability.

## Duplication of Benefits

**Summary:** The purpose of this policy is to define the Duplication of Benefits Policy LOCD will follow in the administration of Federal grants.

**Applicable Laws:** The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding make certain that no “person, business concern, or other entity” will receive duplicative assistance<sup>12</sup>. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, grantees cannot comply with the Stafford Act without first completing a duplication of benefits (DOB) analysis specific to each applicant.

A DOB occurs when:

- A beneficiary receives assistance, and
- The assistance is from multiple sources, and
- The assistance amount exceeds the need for a particular recovery purpose.

In response to multiple natural disasters over several years, the State of Louisiana received supplemental disaster recovery assistance through HUD’s Community Development Block Grant (CDBG) Program. This assistance is intended to supplement—not replace—other public, private, and nonprofit sector resources that have already been provided for the same need or loss and are legally required to constitute a duplicative source of financial assistance.

For example, if a family’s damaged home costs \$100,000 to repair and the homeowner received insurance proceeds in that amount, the homeowner could not also receive federal disaster recovery funds to repair the home. Grantees should assure that each program provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met by funds that have already been paid, or will be paid, from another source.

The purpose of this document is to outline how the Louisiana Office of Community Development (LOCD) assures that all applications for assistance from the programs it funds—as well as all projects implemented by LOCD

---

<sup>12</sup> Stafford Act, Title III, Sec. 312, (a)

grantees, contractors, and subrecipients—will be reviewed for possible duplication of benefits. The procedures described below are also applicable to all LOCD grantees and subrecipients and must be incorporated in the design and administration of programs/projects undertaken by them. This document details LOCD’s general Duplication of Benefits policy. Individual programs may be subject to program specific policies implementing additional Duplication of Benefits requirements or processes, subject to this overarching policy.

The LOCD Program Manager for is responsible for ensuring that the steps below are performed using the best reasonably available data from the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), the National Flood Insurance Program (NFIP), insurers, and other sources of assistance to verify all reasonably identifiable sources of recovery assistance received by or available to the applicant prior to any award.

The first step of the DOB determination (calculation) is to determine the amount of assistance needed and the amount of funds previously received—or to be received—for a particular disaster recovery activity. This is accomplished by first determining the applicant’s post-storm disaster need prior to the receipt or potential receipt of other funds. Next, all other sources of recovery assistance received, or available to be received, must be disclosed during the application process and verified where reasonably possible. Other sources of funds can include but are not limited to: private insurance; the Federal Emergency Management Agency (FEMA); the Small Business Administration (SBA); the National Flood Insurance Program (NFIP); local and state funds; other federal programs; and private and nonprofit organizations. Whether the assistance constitutes a duplicative source can be affected by the use for which it was provided and specific exemptions that may be provided by law, regulation, or waiver, such as provided in the Disaster Recovery Reform Act, Public Law 115-254, which impacts SBA loans for certain presidentially declared disasters.

The next step is to identify assistance that is not available for the activity. This consists of: funds received that are not for the same purpose as the CDBG activity(s); funds not available to the applicant (e.g., forced mortgage payoff, contractor fraud, etc.); funds from unsubsidized private loans (forgivable loans are duplicative); and any other asset or line of credit available to the applicant, such as checking and savings accounts, stocks, etc. These funds are not considered to be duplicative and may be excluded and not deducted as a duplication of benefit. Finally, after subtracting from the proposed activity cost the duplicate funds received or available to receive, the maximum CDBG award is calculated.

Once the maximum CDBG award has been determined, applicants will be required to sign an agreement—either included in a grant/subrecipient agreement or a separate subrogation instrument—requiring them to return to

LOCD<sup>13</sup> any assistance received for the same purpose as the CDBG disaster recovery funds. This agreement is to be monitored by LOCD program staff, grantees, and subrecipients at least annually for three years. Unless an additional need is established, disaster recovery funds should be recaptured to the extent that they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.

**The following is an example of the described process steps for DOB determination:**

1. Identify the Applicant’s Total Need Prior to Any Assistance .....	\$100,000
2. Identify All Potential Duplicative Assistance.....	\$35,000
3. Deduct Assistance Determined to be Duplicative .....	\$30,000
4. Maximum Eligible Award (Item 1 less Item 3) .....	\$70,000
5. Program Cap (if applicable).....	\$50,000
6. Final Award (lesser of Items 4 and 5).....	\$50,000

**UNMET NEEDS**

Disaster recovery assistance needs are calculated at one point in time. As a result, subsequent circumstances may occur that affect the need. If after the assistance has been calculated and/or a CDBG award has been made, an applicant can demonstrate a change in circumstances, the award calculation may be subsequently reevaluated to take the increased need into consideration. Such changes in circumstance include vandalism, contractor fraud, an increase in the cost of materials and/labor, a change in local zoning laws or building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be done before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired).

The federal regulation pertaining to this LOCD policy and procedure for identifying Duplication of Benefits is found in 76FR 71060, November 16, 2011—as modified by 4 84 FR 28836 and 28848 June 20, 2019—which should be reviewed as part of determining Duplication of Benefits. Caution should be utilized in determining the applicability of those notices to the appropriations funding the specific program based on the specific temporal restrictions reflected in those notices.

---

<sup>13</sup> Subrogation agreements in programs run by subrecipients would require repayment to the subrecipient

## MONITORING FOR DOB

The process for identifying and then monitoring for DOB begins with the review of each grant application—whether it is for a specific project or an individual beneficiary of disaster recovery CDBG funds. An applicant must provide detailed information about other sources of funds that were received—or that may be received—related to the activity for which CDBG funds are being requested. LOCD or contracted program management staff review and verify the other funds to determine if they are for the same activity and exceed the need for recovery assistance. Once CDBG funds are awarded (minus any determined to be a DOB), applicants are required to notify LOCD of the receipt of any additional funds received for the same activity. Program staff reviews individual pay requests and project amendments to determine if other funds have been received that represent a DOB. In the event that additional funds are determined to be a DOB, funds will be withheld from future pay requests, and the approved project budget will be amended. In the event that all funds have been expended and a DOB is identified, the applicant will be required to repay the funds to LOCD for return to the U.S. Treasury.

Monitoring for DOB will also be incorporated into LOCD monitoring policies and procedures.

## 4. PROGRAM BUDGET

---

### OVERVIEW

Louisiana Office of Community Development-Disaster Recovery Unit is the lead agency and responsible entity for administering Disaster Relief Supplemental Appropriations Act, 2022 (PL 117-43) in CDBG-DR funds allocated for disaster recovery.

Based on the unmet needs assessment and input from impacted communities throughout Louisiana, the state has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities and increase resilience to climate impacts. The state's initial analysis indicates unmet need in three core recovery categories: housing, infrastructure, and economic revitalization.

The largest recovery need is for housing assistance followed by infrastructure and then economic revitalization. To reflect these findings, the state intends to utilize CDBG-DR funding to support multiple recovery programs that will complement one another. Further, by implementing resilience measures across all programs, the state aims to facilitate recovery that results in improvements to a wide portion of Louisiana's population, leading greater housing, infrastructure, and economic features that can better withstand the impacts of future disaster.

The largest portion of funding has been allocated to assist impacted homeowners and renters through programs that address disaster impacts and affordable housing, as these were the largest needs identified in the unmet needs assessment. Hurricanes Laura and Delta caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state's review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than \$510 million. The need for safe, decent, and affordable housing is the state's top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described above. Approximately 70 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as provide affordable rental housing for persons displaced by the storm.

All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities to ensure compliance with the minimum 15% mitigation funding. In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses and provide for non-federal match for both FEMA PA and HMGP. This is necessary to support a more robust recovery effort. Failing to address these additional needs would neglect the interdependent nature of



Louisiana’s disaster affected communities. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure and planning programs.

Up to five percent of the overall grant will be used for administration of the grant. Funding has been allocated to planning and administration to fund the necessary costs of planning for, setting up and managing the CDBG-DR recovery programs including application intake, compliance monitoring, performance tracking, management of the Disaster Recovery Grant Reporting system, and quarterly reports, as well as general administration. Funding allocated for planning will be available to fund studies, analyses, and additional planning efforts that may result in the establishment of additional recovery and resilience priorities and activities or support the design and implementation of the currently described CDBG-DR programs. The funding allocated across these activity line items may also include reimbursement for otherwise allowable recovery costs that were incurred on or after the incident date of the covered disasters.

The state will dedicate this allocation of \$1.050 billion to address identified unmet needs as outlined above. Of this, \$300million will be dedicated to the meet the unmet housing needs, including rehabilitation of owner-occupied households \$423 million will be dedicated repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$100 million dedicated to assist small businesses impacted by these disasters. The state will dedicate \$195 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements.

As required by the Federal Register, the state will spend 80 percent of the overall grant on activities undertaken in the HUD-identified “most impacted and distressed” (MID) areas. There are 15 HUD-identified MID areas for Hurricanes Laura and Delta. However, the state may determine to make the remaining funds available for eligible program activities in all disaster-impacted parishes. Additionally, the state will spend no less than 70 percent of funds allocated on activities that benefit low- and moderate-income (LMI) households. The affordable housing construction programs and match programs will include mitigation efforts as well as CDBG-MIT activities to ensure the state complies with the 15% mitigation requirement.

All programs will be implemented by the State of Louisiana at this time. The state may work with subrecipients or other agencies in the future to deliver recovery efforts. Depending on a continued assessment of unmet needs, mitigation needs, and additional funding, the state may allocate funds to parishes or other subrecipients through future substantial Action Plan Amendments. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

The Disaster Relief Supplemental Appropriations Act requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver); (2) meet a national objective as defined by 24 Code of Federal Regulations

(CFR) 570.483; and (3) address a direct or indirect impact from the disaster in parishes declared by the President to have been impacted by the disaster. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act (HDCA) of 1974, as amended. The recovery activities described herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low- and moderate-income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Louisiana.

Due to the limited funds received in this allocation, the state has prioritized vulnerable populations throughout each of the programs proposed in this Action Plan. For the owner-occupied housing programs, low- and moderate-income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. In the tenant-based programs, the state will prioritize these vulnerable populations as well as persons displaced by the disaster event in need of affordable housing. As the state conducts housing program intake, it will coordinate outreach efforts in accordance with locales with high levels of documented damages and vulnerability.

The following overview of the housing, infrastructure, economic revitalization, and planning programs provides additional details about the guiding principles and requirements for projects funded under each.

## HOUSING

To address these housing needs, the State of Louisiana proposes the following programs that will focus on assisting homeowners to reconstruct, rehabilitate, and elevate homes to build more resilient communities in areas affected by Hurricanes Laura and Delta:

- Restore Louisiana Homeowner Program
- Flood Insurance Program
- Soft Second Mortgage Program

The state has also prioritized providing affordable rental housing and other housing assistance for persons displaced by the storms through the rehabilitation, reconstruction and creation of new rental housing stock, the creation of homeownership opportunities, and by providing rental assistance and support services to vulnerable persons displaced by the storms. The following programs are proposed:

- Neighborhood Landlord Rental Program
- Middle-Market Loan Program
- Resilient Mixed-Income Gap Funding Program
- Permanent Supportive Housing Program
- Rapid Rehousing Program

Residents of manufactured homes, particularly older manufactured homes, are more vulnerable to disaster damages that impact housing stability and occupant health and safety. Storm damage to manufactured housing often results in serious structural and environmental health hazards for occupants that may not be effectively remediated with rehabilitation activities. Weighing factors such as deterioration potential and rapid depreciation of manufactured housing units, especially units that have been ruined by weather events, it is more cost-effective to replace a disaster-damaged unit rather than to rehabilitate it. This is in part because repairs may not sufficiently address damages, and often the repaired units ultimately need to be replaced. Replacing manufactured housing, rather than repairing damaged units, serves the long-term housing needs of Louisiana's disaster-affected citizens and protects homeowners from potential latent health, safety, and environmental hazards. Newer manufactured housing units are built to higher construction standards and offer more storm resiliency and energy-efficient options. These features result in better utility efficiency, lower utility charges, and better withstand future disaster impacts. Replacement further mitigates against any unknown environmental or structural damages that could be associated with a repaired unit. The Program will provide funds for the replacement of single-wide or double-wide damaged units up to maximum payment amounts established in Program policy and procedure.

Applicants living in a Special Flood Hazard Area (SFHA) who receive federal assistance under these programs must obtain and maintain flood insurance for rehabilitated, reconstructed, or elevated properties.

New housing construction and reconstructed homes will be built to a standard that accounts for 0.2 percent Annual Exceedance Probability (AEP) flood events or in areas outside of the 0.2 percent AEP floodplain, thus reducing the need for limited resources in future disaster response and recovery operations. These projects will require OCD-designated standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana's affordable housing industry.

Buyouts and acquisitions will be prioritized to include sites that were substantially damaged from the hurricanes and are subject to repetitive or severe flooding, significant future flood risk, as shown in the Coastal Protection and Restoration Authority's (CPRA) Coastal Master Plan, or sites that are in proximity to a flood source, within the potential land acquisition area of a flood control project, or subject to a disposition or conservation plan by a state or local entity, including a nonprofit or environmental preservation organization. The program would also target benefits to vulnerable communities or those communities experiencing extensive damage and subject to the potential large-scale relocation of homeowners via buyout and safe housing incentive.

The following are ineligible activities:

- Forced mortgage payoffs

- SBA home/business loan payoffs
- Funding for second homes (owner-occupied second homes) (other than buyout programs)
- Assistance for those who previously received federal flood disaster assistance and did not maintain flood insurance (other than buyout programs)
- Compensation payments

## ECONOMIC REVITALIZATION

The state has allocated funds to support economic revitalization in areas impacted Hurricanes Laura and Delta through a suite of programs described below. The state understands that residential communities cannot fully recover and thrive without businesses returning to the community, as they provide essential services and employment to local residents. It is imperative that the state invest in those businesses that support recovering neighborhoods, provide local employment opportunities and produce the foods consumed directly or indirectly by local residents. In order to ensure these businesses remain viable and resilient in the face of future disasters, the state may provide technical assistance and mitigation support to the impacted businesses, which may include but not be limited to: training to develop a business continuity plan or institute better recordkeeping, accounting and inventory practices; resources to assess flood risk for the business location; information on securing generator hookups and other similar measures. The state has prioritized businesses that experienced physical or financial losses as a result of the disaster and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

The economic revitalization portfolio included herein aims to support the state's long-term recovery in the following ways:

- Provide assistance to small businesses that provide income-producing jobs to residents of the disaster-impacted communities.
- Provide assistance to small businesses that provide services, goods and amenities to residents of the disaster-impacted communities.
- Ensure the financial assistance invested in these programs is sound and secure through the provision of technical assistance to eligible businesses.

**Ineligible Activities:** Forced mortgage payoffs; SBA home/business loan payoffs; funding for second homes; assistance for those who previously received Federal flood disaster assistance and did not maintain flood insurance; and compensation payments.

**SBA Declined Loans:** Business owners approved for SBA loans who declined their loans or have drawn less than the full amount of the approved SBA loans will be reviewed for eligible award amounts and duplication of benefits, per the state’s program policies and procedures

## INFRASTRUCTURE

Investments in infrastructure repair and rebuilding in areas impacted by Hurricanes Laura and Delta helps to secure investments in housing recovery and bolsters confidence in communities continuing to rebuild. Without assistance to meet the state and local match requirements, the infrastructure and resources typically provided by state and local governments will be severely at-risk, as the state and local governments will be required to either a) forgo assistance from FEMA PA or b) divert funding needed for other community needs toward meeting the match requirements. The state will dedicate funds to offset the burden of the non-federal share match requirements faced by state and local entities and jurisdictions.

## PLANNING

The post-disaster recovery period is a valuable opportunity to ensure that a community’s recovery and resilience plans are enacted in the most efficient and effective way possible. The recovery period also presents an opportunity for a community to consider if the development standards in place are sufficient to ensure safety in future disasters, and potentially to enhance development standards to protect more residents in the next potential disaster. Building on the established planning structures described in the Planning and Coordination Section D below, the state may provide funding to enhance capacity in the local emergency response, drainage, floodplain management and planning/permitting departments of local and regional public entities impacted by the disaster. This program may support activities including, but not limited to the creation, revision, or enhancement of planning tools or plans, staff capacity, hiring, or training, and other planning costs associated with resilient recovery processes and safe development practices that account for the flood and hurricane risks that can be anticipated in the future in the impacted areas.

## PROGRAM BUDGET - 2020

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$272,298,226.00	\$217,838,581.00	\$54,459,649.00	45%	\$0.00	Low- and moderate-income or Urgent Need	0
	Buyout	\$20,000,000.00	\$16,000,000.00	\$4,000,000.00	3%	\$0.00	Low- and moderate-income or Urgent Need	0



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
	New Construction	\$90,000,000.00	\$72,000,000.00	\$18,000,000.00	15%	\$0.00	Low- and moderate-income or Urgent Need	0
	Other	\$3,500,000.00	\$2,800,000.00	\$700,000.00	1%	\$0.00	Low- and moderate-income or Urgent Need	0
ECONOMIC REVITALIZATION	Workforce Training	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Business Grants	\$5,100,000.00	\$4,080,000.00	\$1,020,000.00	1%	\$50,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Health Facilities	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$185,232,774.00	\$148,186,219.00	\$37,046,555.00	31%	\$0.00	Low- and moderate-income or Urgent Need	0
PUBLIC SERVICES	Legal Services	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Housing Counseling	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
ADMIN	Admin	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
PLANNING	Planning	\$23,900,000.00	\$19,120,000.00	\$4,780,000.00	4%	\$0.00	Low- and moderate-income or Urgent Need	0
<b>TOTAL</b>		<b>\$600,131,000.00</b>	<b>\$480,104,800.00</b>	<b>\$120,026,204.00</b>	<b>100</b>			

Data Source(s): State of Louisiana Office of Community Development

**PROGRAM BUDGET - 2021**

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Buyout	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	New Construction	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
ECONOMIC REVITALIZATION	Workforce Training	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Business Grants	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Health Facilities	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
PUBLIC SERVICES	Legal Services	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Housing Counseling	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
ADMIN	Admin	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
PLANNING	Planning	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
<b>TOTAL</b>		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>0</b>	<b>0</b>

Data Source(s): OCD

## Total Allocation: \$1.05 Billion

Light Gray Text: First Allocation of \$600M

Light Blue Text: Revised Allocation (to include additional funding of \$450M)

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$272,298,226.00 \$250,000,000.00	\$217,838,580.80 \$200,000,000.00	\$54,459,649.20 \$50,000,000.00	45% 24%	-	Low- and moderate-income or Urgent Need	0
	Buyout	\$20,000,000.00 \$10,000,000.00	\$16,000,000.00 \$8,000,000.00	\$4,000,000.00 \$2,000,000.00	3% 1%	-	Low- and moderate-income or Urgent Need	0
	New Construction	\$90,000,000.00 \$456,078,744.00	\$72,000,000.00 \$364,862,995.20	\$18,000,000.00 \$91,215,749.80	15% 43%	-	Low- and moderate-income or Urgent Need	0
	Other	\$3,500,000.00 \$6,500,000.00	\$2,800,000.00 \$5,200,000.00	\$700,000.00 \$1,300,000.00	1% 1%	-	Low- and moderate-income or Urgent Need	0
ECONOMIC REVITALIZATION	Workforce Training	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
	Business Grants	\$5,100,000.00 \$100,455,482.00	\$4,080,000.00 \$80,364,385.60	\$1,020,000.00 \$20,091,096.40	1% 10%	-	Low- and moderate-income or Urgent Need	0
	Other	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
	Health Facilities	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
	Other	\$185,232,774.00 \$185,232,774.00	\$148,186,219.20 \$148,186,219.20	\$37,046,554.80 \$37,046,554.80	31% 18%	-	Low- and moderate-income or Urgent Need	0
PUBLIC SERVICES	Legal Services	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
	Housing Counseling	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0
	Other	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	-	0	0





	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
<b>ADMIN</b>	Admin	\$23,900,000.00 <b>\$41,900,000.00</b>	\$19,120,000.00 <b>\$33,520,000.00</b>	\$4,780,000.00 <b>\$8,380,000.00</b>	4% <b>4%</b>	-	Low- and moderate-income or Urgent Need	0
<b>PLANNING</b>	Planning	\$100,000.00 <b>\$100,000.00</b>	\$80,000.00 <b>\$80,000.00</b>	\$20,000.00 <b>\$20,000.00</b>	0% <b>0%</b>	-	Low- and moderate-income or Urgent Need	0
<b>TOTAL</b>	<b>\$600,131,000.00</b>	\$480,104,800.00 <b>\$1,050,267,000.00</b>	\$120,026,200.00 <b>\$840,213,600.00</b>	\$28,900,000.00 <b>\$210,053,400.00</b>				

Data Source(s): State of Louisiana Office of Community Development

## Connection to Unmet Needs

As required by the FR-6303-N-01, Louisiana Office of Community Development - Disaster Recovery Unit will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a Laura DR-4559 and Delta DR-4570 presidential major disaster declaration.

This action plan primarily considers and addresses housing, infrastructure and economic development unmet needs along with mitigation activities incorporated in all programs.

At least 70 percent of all program funds will benefit LMI persons or households. As most of the programs submitted in the action plan are either limited to benefitting LMI persons or prioritize assisting LMI persons in accessing programs, the state anticipates meeting the requirement. The state will also be assessing the status of eligible unmet needs of LMI persons and non-LMI persons and determining, at an appropriate stage, whether to request a modification of the requirement.

## Leveraging Funds

To maximize the impact of the CDBG-DR funding provided to the state, and as part of a continuous effort to prevent duplication of benefits, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. Further, the state will utilize existing relationships and strive to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of utilizing all viable sources of funding.

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources indicated below. Existing state resources and other funds from the disaster appropriation will be further examined to ensure that all available funding is utilized where it is most needed and leveraged appropriately.

## OTHER SOURCES OF FUNDS

### *Housing*

The state has designed the housing programs in this Action Plan to cover the gap funding needed by leveraging funds from insurance, FEMA, SBA, private and nonprofit entities, other assistance to complete the repairs from Hurricanes Laura and Delta.

The housing programs also leverage CDBG-DR funds with funds that include but are not limited to the following programs: Low-Income Housing Tax Credit (LIHTC), HOME, Permanent Supportive Housing, and Continuum of Care.

### *Economic Development*

The state will combine funding to address economic development unmet needs from other federal funding sources such as SBA loans, NFIP, non-disaster CDBG funding, USDA, and the U.S. Department of Commerce. Non-federal resources such as local and state economic development public funds, as well as private financing and equity investments, will provide additional leverage to disaster recovery funds.

### *Infrastructure*

The state will combine funding to address infrastructure unmet needs from other federal funding sources such as non-disaster CDBG funding, USDA, and FEMA PA and HMGP. Additional non-federal resources such as local and state public funds will provide additional leverage to these disaster recovery funds.

### *Mitigation*

The state will leverage other federal and non-federal funding sources related to mitigation efforts, as well as incorporate best practices from projects, data collection, modeling, and policy measures associated with the use of \$1.2 billion in funds described in its Community Development Block Grant-Mitigation (CDBG-MIT) Action Plan, to further advance the Louisiana Watershed Initiative's long-term resilience goals and objectives <https://watershed.la.gov/action-plan>.

## Distribution of Funds.

All programs will be implemented by the State of Louisiana at this time, unless noted otherwise in the respective program descriptions. Depending on a continued assessment of unmet needs, mitigation needs, and additional funding, the state may allocate funds to parishes or other subrecipients through future substantial Action Plan Amendments. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

### CONNECTION TO UNMET NEEDS

Based on the unmet needs assessment and input from impacted communities throughout Louisiana, the state has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities, in addition to the increased resilience to climate impacts.

The Disaster Relief Supplemental Appropriations Act requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver); (2) meet a national objective as defined by 24 Code of Federal Regulations (CFR) 570.483; and (3) addresses a direct or indirect disaster impact in presidentially declared impacted parishes. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act (HDCA) of 1974, as amended. The recovery activities described herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low- and moderate-income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Louisiana.

As required by the Federal Register, the state will spend 80 percent of the overall grant on activities undertaken in the HUD-identified “most impacted and distressed” area. There are 15 HUD-identified most impacted and distressed areas for Hurricanes Laura and Delta. However, the state may determine to make the remaining funds available for eligible program activities in all disaster-impacted parishes.

Up to five percent of the overall grant will be used for administration of the grant. Also, as required by the Federal Register Notice, the state will spend no less than 70 percent of funds allocated on activities that benefit low- and moderate-income (LMI) households.

Hurricanes Laura and Delta caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state’s review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than \$510 million. The need for safe, decent, and affordable housing is the state’s top priority, which is why the state has prioritized funding for housing and has allocated a

proportion not equivalent to the unmet needs described above. Approximately 50 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as to provide affordable rental housing for persons displaced by the storm. In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses and provide for non-federal match for both FEMA PA and HMGP. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure, and planning programs.

The state will dedicate this allocation of \$1.050 billion to address identified unmet needs as outlined above. Of this, \$300million will be dedicated to the meet the unmet housing needs, including rehabilitation of owner-occupied households \$423 million will be dedicated repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$100 million dedicated to assist small businesses impacted by these disasters. The state will dedicate \$195 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements.

Due to the limited funds received in this allocation, the state has prioritized vulnerable populations throughout each of the programs proposed in this Action Plan. The owner-occupied housing programs will prioritize, low- and moderate- income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. And, in the tenant-based programs, the state will prioritize the same populations plus, persons displaced by the disaster event in need of affordable housing. As the state conducts housing program intake, it will coordinate outreach efforts in accordance with locales with high levels of documented damages and vulnerability.

## Program Income

During the performance of the grant, program income will be remitted to the state for funding of additional unmet needs of any program in the approved Action Plan, or subsequent amendments, as determined by the state on a periodic basis.

The state understands that when implementing certain activities with CDBG-DR funds, there is potential for generating program income. The state will develop and adopt program income policies and procedures for the specific program accordingly. The method of distribution of the program income may vary from that of the program funds, as specified in the state's policies for the program.

The state does not anticipate program income from the administration of the projects and programs in this Action Plan, however, any program income generated by CDBG-DR funds under this grant will be recorded in one of the following methods:

## PROGRAM INCOME DEPOSITED IN THE REVOLVING LOAN FUND

Revolving Loan Funds are interest bearing accounts set up in the state's accounting system and are separate from the General Fund. Interest earned is calculated by the State Treasury and credited to the fund balance on a monthly basis.

## PROGRAM INCOME USED TO REDUCE THE NEXT PROGRAM DRAW

OCD shall distribute Program Income before the state makes additional withdrawals from the Treasury.

## Pre-Agreement Cost

OCD has incurred and plans to incur additional pre-agreement costs and will seek reimbursement for these costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of OCD used for the planning of the CDBG-DR programs. Other pre-agreement costs, which OCD will fund with this grant, could include activity delivery and projects costs associated with eligible disaster recovery programs identified within this Action Plan.

Moreover, the state may request reimbursement for certain eligible pre-award costs necessary for the efficient and timely implementation of its recovery programs. These costs may include environmental review, damage assessment and other costs necessary for determining eligibility of housing related projects. The state will also work with non-governmental entities working to fund housing recovery through short term, private and philanthropic loan funds intended to jump start critical housing recovery programs for at risk populations.

## Resale or Recapture

Obligations related to the consequence of a transfer of property, or repayment of grants, vary depending on the program. For the Restore Louisiana homeowner assistance program, there are no consequences to the sale of the property following completion of the rehabilitation or reconstruction of the damaged property.

The other housing programs have periods of occupancy (soft second homeowner assistance) or affordability periods (affordable rental programs) imposed through mortgage and/or deed restriction provisions filed into the parish land records.

The transfer of the property during these periods can result in a repayment obligation to the state. Similarly, failure to comply with the obligations of the particular program, including but not limited to completion of project/placement into service, expenditure of funds, compliance with federal and state laws, regulations, program requirements, and meeting the housing obligation associated with the program; can result in a default of



the obligation to the state and consequences of repayment of outstanding amounts and/or foreclosure on the property.

Obligations and means of enforcement for non-housing programs vary depending on the nature of the grantee (i.e., public or private entity), purpose, and amount of funds; all of which are subject to federal and state laws, regulations, and terms and conditions associated with the grant.

Requirements related to other funding regimes involved in a project (i.e., New Market Tax Credits) may also require special terms and conditions associated with the CDBG grant, modifying the above.

## B. PROGRAM DETAILS

### Housing Programs

#### FLOOD INSURANCE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$500,000.00	\$400,000.00	\$100,000.00

#### NARRATIVES

##### *Program Description*

To protect the CDBG-DR investment and enable serving the state’s most vulnerable active grantees, the Restore Louisiana Homeowner Program (RLHP) may provide LMI households that demonstrate a financial hardship with assistance in obtaining their initial-required flood insurance. This assistance will cover the costs of flood insurance premiums for properties covered by the Flood Disaster Protection Act of 1973, as amended, pursuant to 24 CFR 570.605 for one year.

The one-year term flood insurance premium will be calculated as a supplement to the eligible homeowner’s RLHP grant, based on a Program-evaluated quote, and will be paid on behalf of the homeowner directly to the insurance provider.

RLHP will work to provide financial guidance to impacted homeowners as well as counseling, to enable them to understand the need and process for budgeting for flood insurance premiums in perpetuity. Furthermore, the state will issue communications and public service advisories reminding homeowners of their responsibility to maintain flood insurance on properties located in areas where federal assistance was received. The state will notify all property owners receiving disaster assistance that are required to purchase and maintain flood insurance of the statutory obligation to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and that they, as the transferring owner, may be liable if they fail to do so.

##### *Program Tieback to Disaster/Unmet Needs*

This program is only available to applicants who sustained damage to their home as a result of Hurricane Laura and/or Delta and are determined eligible for the RLHP.

*How Program will Promote Housing for Vulnerable Populations*

This program is only available to those vulnerable homeowners who cannot afford flood insurance and are at risk of not being covered by flood insurance in the event of a future disaster. This program specifically targets LMI households.

*Program Affordability Period (if applicable)*

Not applicable

*Program Definition of Second Home/Eligibility*

Not applicable

*Program National Objective(s)*

National Objective: Benefits to low and moderate income (LMI) persons or households.

*Program Eligibility*

**Eligible Activity:** HCDA Sections 105(a)(4)

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:** Applicants at or below 80 percent AMI adjusted for household size who do not have the adequate flood insurance necessary for program closeout.

- Applicants must be eligible recipients of CDBG-DR grant funds in the RLHP.
- Applicants must execute their RLHP Grant Agreement, committing to completing the eligible repair activities outlined in an inspection report and identified on the Estimated Cost to Repair (ECR) report.

The FIA Program is available to active RLHP grantees that can demonstrate a financial hardship in paying the cost of flood insurance as required by the program. An active grantee is considered to have a financial hardship if their housing payment equals or exceeds thirty percent of their monthly take-home pay and the insurance premium is more than fifteen percent of the active grantee's annual disposable income.

FIA is not a reimbursement for flood insurance already purchased or for payments already made on a flood insurance policy.

Additional eligibility requirements are as follows:

- Homeowner must be eligible recipient of CDBG-DR grant funds in the RLHP; and



- Homeowner must be ready to close on their RLHP repair/reconstruction grant under the RLHP or have closed successfully on their grant but have not reached final closeout; and
- Homeowner must be determined under the RLHP as meeting the LMI national objective.
- Homeowner must sign their RLHP Grant Agreement for the Flood Insurance Assistance (FIA), committing to completing the eligible repair activities outlined in an inspection report and identified on the Estimated Cost to Repair (ECR) report; and
- Homeowner must be in a SFHA and an NFIP-participating community; and
- Homeowner must either have no flood insurance or inadequate flood insurance and no means to acquire or increase flood insurance coverage, as applicable.

*Program Responsible Entity*

Administering Entity - State of Louisiana or its subrecipient(s)

*Program Maximum Assistance*

Maximum Award - One-year term flood insurance premium not to exceed \$2,000.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable

*Program Method of Distribution Description/Overview (if applicable)*

One Year of NFIP Building/ Structure Flood Insurance Coverage directly to the insurance provider.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## INTERIM HOUSING ASSISTANCE

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$1,000,00.00	\$800,000.00	\$200,000.00

## NARRATIVES

### *Program Description*

The Interim Housing Assistance Program will provide prospective interim mortgage assistance for up to 20 months or rental assistance for up to 20 months (pending waiver to extend) and/or temporary hotel assistance for up to an estimated 90 days to eligible homeowners whose households are at or below 80 percent AMI, are actively working through the RLHP and are either:

- Currently incurring additional mortgage and/or rental costs when compared to the mortgage costs incurred prior to the applicable flood event, after removing duplicative assistance from other funding sources provided as support for interim housing expenses; or
- Currently housed in FEMA temporary housing units, without a housing plan after the FEMA temporary housing unit deadline.

### *Program Tieback to Disaster/Unmet Needs*

Serving low-income families in the process of home rehabilitation or reconstruction as impacted from damages by Hurricane Laura and/or Delta through the RLHP.

### *How Program will Promote Housing for Vulnerable Populations*

This program aims to provide temporary housing for low to moderate income families.

### *Program Affordability Period (if applicable)*

Not applicable

### *Program Definition of Second Home/Eligibility*

Not applicable

### *Program National Objective(s)*

National Objective: Benefits to low to moderate income persons.

### *Program Eligibility*

**Eligible Activity:** Interim housing assistance, Rental assistance to displaced homeowners, HCDA Sections 105(a)(8), FR-5989-N-01, 81 FR 83254

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

### **Eligible Applicants, Criteria for Selection and Method of Distribution:**

- RLHP applicants determined by the program to meet the LMI national objective, or who are up to 80 percent AMI, who have not completed the repairs and/or reconstruction of their damaged homes.
- Applicant must be eligible recipients of CDBG-DR grant funds in the RLHP.
- Applicant must actively participate in the program, and demonstrate progress toward completing their recovery.
- Applicant must agree to sign a RLHP Grant Agreement for the interim housing assistance, committing to the terms of receiving the interim housing benefit and completing the eligible repair activities outlined in an inspection report and identified on the Estimated Cost to Repair (ECR) report.

### *Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

### *Program Maximum Assistance*

- **Mortgage and/or Rental Assistance:** On a monthly basis, up to a) the lesser of the mortgage house payment or additional interim housing cost incurred for up to 20 months or b) the maximum 2022 fair market rents based on the household size, for up to 20 months (pending waiver to extend). Based on such factors as the percentage of adjustment and the administrative burden of making programmatic adjustments mid-way through a program, the state may adjust the maximum amount per month a household is eligible to receive if or when HUD published fair market rents are adjusted.
- **Temporary Hotel Assistance:** The maximum amount is based on state limits, detailed in PPM 49: <https://www.doa.la.gov/Pages/osp/Travel/TravelPolicy.aspx>. The appropriate number of rooms will be provided based on family size. Hotel assistance is limited to the earlier of when the repairs or reconstruction is complete or an estimated 90 days. Extensions to this time limit will be considered on a case-by-case basis, when there are exigent circumstances. Some may transition from hotel to interim rental or mortgage assistance, but in no case will recipients receive more than 20 months of assistance.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable

*Program Method of Distribution Description/Overview (if applicable)*

The short-term lodging and interim housing assistance received through IHA is paid directly to the provider (hotel or rental property owner), not to the homeowner, on a negotiated payment duration (i.e., bi-weekly, monthly) or as specified in the lease-terms. IHA will not be used as a reimbursement for previously paid or incurred costs.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## MIDDLE-MARKET LOAN PROGRAM (MMLP)

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$30,000,000.00	\$24,000,000.00	\$6,000,000.00

### NARRATIVES

#### *Program Description*

The Middle-Market Loan Program (MMLP) will provide gap financing to support the rehab and/or construction of multi-family buildings in impacted parishes that serve a range of household incomes, with the goal of achieving below-market rent affordability for LMI households.

That range of “middle-market” rents also allows participants to embed units with deeper affordability into higher-income areas, which provides good, stable housing in high-opportunity areas to low-income families and encourages socioeconomic integration into communities.

Projects funded through MMLP will require OCD standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana’s affordable housing industry.

#### *Program Tieback to Disaster/Unmet Needs*

The Middle Market Loan Program (MMLP) will develop affordable rental housing units to address the impact of the disasters in reducing the supply of affordable housing and increasing the demand for housing stock.

#### *How Program will Promote Housing for Vulnerable Populations*

The Middle-Market Loan Program (MMLP) will directly serve the LMI population.

#### *Program Affordability Period (if applicable)*

Minimum 20 years

#### *Program Definition of Second Home/Eligibility*

Not applicable

#### *Program National Objective(s)*

National Objective - Benefits to low- and moderate-income persons



### *Program Eligibility*

#### **Eligible activity:**

- Acquisition of Real Property, HCDA Sections 105 (a)(1)
- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)
- New Housing Construction Waiver, as identified in Federal Register Docket No. 6303-N-1

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:** Eligible applicants must have site control or ownership of proposed property, and the project must create new affordable housing units, whether through new construction or rehabilitation.

### *Program Responsible Entity*

Administering Entity - State of Louisiana

### *Program Maximum Assistance*

\$6 Million

### *Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

### *Other Program Details*

#### *Program Competitive Application Overview (if applicable)*

Funds will be awarded through a competitive Notice of Funding Availability (NOFA) process. Eligible applicants may be prioritized based on experience developing or rehabilitating multi-family buildings, and resilient/sustainable construction. Each project will be reviewed for affordable housing outcomes, financial feasibility and cost reasonableness.

#### *Program Method of Distribution Description/Overview (if applicable)*

The MMLP program will award funding to eligible applicants in the form of gap financing loans to support the construction or rehabilitation of affordable housing units. At least 51 percent of those created or preserved units must be made affordable to households earning up to 80 percent AMI for a minimum of 20 years.



Eligible projects may include unrestricted units to offset the cost of units for LMI households, and occupancy of those units by households earning greater than 80 percent of AMI is not prohibited.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## NEIGHBORHOOD LANDLORD RENTAL PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$20,000,000.00	\$16,000,000.00	\$4,000,000.00

### NARRATIVES

#### *Program Description*

The Neighborhood Landlord Rental Program will offer funding for applicants to rehabilitate existing housing units or construct new affordable housing units. NLRP will also revitalize communities impacted by Hurricanes Laura and Delta by reducing the blight of damaged properties as it redevelops them into affordable rental housing.

#### *Program Tieback to Disaster/Unmet Needs*

The Neighborhood Landlord Rental Program assists landlords with loans for rehabilitation or reconstruction of damaged rental properties as a direct result of Hurricane Laura and/or Hurricane Delta. In addition, new construction to increase affordable housing is permitted.

#### *How Program will Promote Housing for Vulnerable Populations*

These repaired or new units will provide affordable housing to vulnerable populations.

#### *Program Affordability Period (if applicable)*

Affordability Period - For five units and above in accordance with HOME program standards of 24 CFR 92.2529e0. Four units and below will be governed by periods set in program policies.

#### *Program Definition of Second Home/Eligibility*

None

#### *Program National Objective(s)*

National Objective: Benefits to low- and moderate-income persons (LMI).

#### *Program Eligibility*

##### **Eligible activity:**

- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)



- New Housing Construction Waiver, as identified in Federal Register No. 6303-N-01

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:** Eligible applicants include any public, private, for-profit, or non-profit entity which owns the subject property at the time of application.

*Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

*Program Maximum Assistance*

Maximum Award - \$725,000 (additional cap on number of units)

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

- Awards will be made to qualified applicants based on the score during the competitive round of funding and thereafter upon submission of eligible, completed applications.
- Specific scoring criteria will be outlined in the program guidelines.
- Applicants must own the unit and have clear title to the property for which they are applying at the time of application.
- Each project will be reviewed for ownership, title issues, duplication of benefits, financial feasibility, and cost reasonableness.
- Applications must be for only one property; however, developers may submit multiple applications.
- Properties must be located outside of a Special Flood Hazard Area (SFHA).
- Preference will be given to for-profit applicants that were property owners at the time of the hurricanes. Applicants who acquired property after Hurricanes Laura and Delta are also eligible to apply but the applicant must have acquired the property by the time of application. Prior to the application period, the state will conduct outreach and education events for potential applicants. Potential applicants are not required to participate in these events to apply to the program, but it is strongly recommended.

*Program Method of Distribution Description/Overview (if applicable)*

NLRP applicants will either demonstrate available personal assets for construction or engage with commercial lenders who commit interim construction financing for new construction or renovation of residential rental properties located in eligible parishes.

Awards provided to non-profit owners, private and public developers and for-profit owners for the repair of damaged structures or new construction of affordable housing for low-income families will be issued as take-out assistance in the form of forgivable loans for eligible rehabilitation, reconstruction and/or new construction costs, as defined in the program policies and procedures. Reimbursement for properties already renovated or newly constructed will not be eligible for this program.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## PERMANENT SUPPORTIVE HOUSING PROGRAM (PSHP)

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$5,000,000.00	\$4,000,000.00	\$1,000,000.00

### NARRATIVES

#### *Program Description*

The Permanent Supportive Housing Program (PSHP) model is a proven, evidenced-based best practice housing model that results in long-term improved outcomes for people whose disabilities would otherwise severely compromise their housing and economic security.

PSHP achieves these outcomes in two ways:

- Creates affordable rental housing units in a non-institutional setting linked with flexible community-based supportive services. This approach leads to reduced utilization of emergency room services and other high-cost health / social service interventions, and to cost savings that outweigh spending required to provide the supportive services.
- Creates a program network coordinated at the state level rather than at the provider level, systematizes access to a pipeline of affordable housing units, and opens up opportunities to leverage Medicaid funding and disaster recovery funds for long-term housing solutions.

This approach emphasizes the long-term resilience of both the individuals who benefit from supportive housing and the institutional networks that serve them.

#### *Program Tieback to Disaster/Unmet Needs*

The PSHP is coupled with multifamily affordable housing programs in addressing the direct and indirect impacts of the disasters on affordable housing within the MIDs, increasing the scope of the tenants which those programs can serve.

#### *How Program will Promote Housing for Vulnerable Populations*

Supportive housing services prevent homelessness and enable vulnerable individuals to remain housed and achieve increasing levels of self-sufficiency.

#### *Program Affordability Period (if applicable)*

Not applicable

*Program Definition of Second Home/Eligibility*

Not applicable

*Program National Objective(s)*

National Objective - Benefits to low and moderate (LMI) income persons or households

*Program Eligibility*

**Eligible Activity:** HCDA. Sec.105(a)(8), 105(a)(11)

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:** A household is considered to be in need of permanent supportive housing if the following conditions are met:

- Household includes a person who has a disability and is currently receiving Medicaid services (MHR or eligible waiver services).
- Need for housing supports offered through PSH.
- Very low-income (50 percent of the Area Median Income) will be prioritized

**Criteria for Selection:** Households that are homeless, at risk of becoming homeless, living in an institution, or at risk of living in an institution will be prioritized.

*Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

*Program Maximum Assistance*

Maximum award: Based on a calculation of combined funding assistance.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable.

*Program Method of Distribution Description/Overview (if applicable)*

Funding will be through payment to service providers through presentation by landlord of vouchers or by direct reimbursement to landlords, as per program policies.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## RAPID REHOUSING PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$5,000,000.00	\$4,000,000.00	\$1,000,000.00

### NARRATIVES

#### *Program Description*

The state has established a model of Rapid Rehousing for households following disasters. The Rapid Rehousing Program (RRH) is based on an effective solution to address the needs of persons at risk of becoming homeless by providing a combined solution of affordable housing and support services that help households to be self-sufficient. This includes preventing homelessness whenever possible by rapidly rehousing people when homelessness is imminent and providing 'wrap around' services that stabilize the cost of housing and supports self-sufficiency for the household.

#### *Program Tieback to Disaster/Unmet Needs*

The Rapid Rehousing Program provides rental assistance and supportive services to households displaced by Hurricane Laura and/or Hurricane Delta at risk of becoming homeless.

#### *How Program will Promote Housing for Vulnerable Populations*

Rapid Rehousing Program provides homeless and housing instability households (including those living in hotels and or FEMA temporary housing) in FEMA IA declared parishes with temporary housing assistance and supportive services.

#### *Program Affordability Period (if applicable)*

Not applicable

#### *Program Definition of Second Home/Eligibility*

Not applicable

#### *Program National Objective(s)*

National Objective: Benefits to low- and moderate-income persons or households

#### *Program Eligibility*

**Eligible Activity:** HCDA Sec.105(a)(4), 105(a)(8)



**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:**

Eligible applicants are homeless or facing housing instability and lack the necessary resources and or support networks to obtain housing.

*Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

*Program Maximum Assistance*

\$1,000 per month, maximum \$12,000 per year

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable

*Program Method of Distribution Description/Overview (if applicable)*

The program policies will provide for process the applicant, housing provider or non-profit administrators to receive disbursements. Funds may be used for up to three months of rental assistance, or up to 24 months, with a waiver, security deposits, rental and utility arrearages, and application and background check fees charged when applying for housing.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## RESILIENT MIXED INCOME GAP FUNDING PROGRAM (PRIME)

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$356,078,744.00	\$284,862,995.00	\$71,215,749.00

### NARRATIVES

#### *Program Description*

The Resilient and Mixed Income Piggyback Program (PRIME) provides funding for the construction of quality, affordable multifamily rental developments.

PRIME requires that all new units incorporate disaster resilience measures to provide better outcomes in a major storm or rain event. The program's policies have the stated goal of providing more social and physical security in the rental and housing market and encouraging innovation in building practices to lessen future storm impacts to property and residents.

With the additional proposed resources from PRIME, the state can ensure that rental units created to address rental needs in impacted areas will also protect low-income rentals from future disasters.

In addition to being required to meet the programmatic LIHTC requirements, applicants eligible for PRIME assistance are required to develop new, quality, affordable rental housing using higher standards and innovative practices in order to lower the risks from storm and hurricane-related impacts. The funding will provide developers with the opportunity to use workable approaches to resilient housing (such as, but not limited to elevated structures/mechanicals, building materials/technologies, power generation, topography and landscaping, retention/detention ponds, etc.) toward development of nearly two dozen properties, which are substantially more likely to fare better in major storms than existing properties in similar locations.

#### *Program Tieback to Disaster/Unmet Needs*

Provides affordable multifamily rental developments which addresses the current lack of affordable rental units as a direct and indirect result of the 2020 disasters.

#### *How Program will Promote Housing for Vulnerable Populations*

PRIME provides quality, affordable rental housing for vulnerable populations targeting low to moderate income households along with individuals at risk of homelessness.





*Program Affordability Period (if applicable)*

Minimum 20 years

*Program Definition of Second Home/Eligibility*

Not applicable

*Program National Objective(s)*

National Objective: Benefits to low- and moderate-income persons or households

*Program Eligibility*

**Eligible Activity:** Acquisition, clearance, rehabilitation, reconstruction, and new construction, elevation, loan financing HCDA Sections 105(a)(1), (4) and (14).

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta.

**Eligible Applicants:** All applicants will be experienced LIHTC single asset entity limited partnerships in good standing with the state. General partners of these limited partnerships may be for- or non-profit entities. A PHA may participate as a general partner.

*Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

*Program Maximum Assistance*

\$150,000 per unit, with no award exceeding \$10 million.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Each project will be reviewed on a competitive basis in an initial funding round. Additional rounds will be held if all funds are not allocated in the initial funding round. Scoring criteria may include weighted levels of use of mixed income, affordable units, energy efficiency, resilient design, financial efficiency, depth of affordability, and other desirable factors as defined in the Qualified Allocation Plan (QAP) or Notice of Funding Availability. The state may

issue residual funds on a limited noncompetitive basis following a NOFA if it determines that residual funds do not justify an additional round, as provided by the program policies.

*Program Method of Distribution Description/Overview (if applicable)*

PRIME provides gap financing loan assistance as a “piggyback” to Low Income Housing Tax Credit developments.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## RESTORE LOUISIANA HOMEOWNER PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$300,000,000.00	\$240,000,000.00	\$60,000,000.00

### NARRATIVES

#### *Program Description*

The Restore Louisiana Homeowner Program (RLHP) will provide critical support to homeowners impacted by Hurricanes Laura and Delta. Due to the amount of time that has elapsed since the qualifying disasters the state recognizes that homeowners are in varied stages of their rebuilding process and has designed a program that will assist eligible homeowners at different points in their recovery. The Restore Louisiana Homeowner program will cover eligible costs for the repair, replacement, or elevation of storm damaged homes.

Applicants living in a Special Flood Hazard Area (SFHA) who receive federal assistance under these programs must obtain and maintain flood insurance for rehabilitated, reconstructed, or elevated properties.

New housing construction and reconstructed homes will be built to a standard that accounts for 0.2 percent Annual Exceedance Probability (AEP) flood events or in areas outside of the 0.2 percent AEP floodplain, thus reducing the need for limited resources in future disaster response and recovery operations. These projects will require OCD-designated standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana's affordable housing industry.

Buyouts and incentives will be prioritized to include sites that were substantially damaged from the hurricanes in a floodway and not eligible for other solutions in the Restore Program. Additionally, areas subject to repetitive or severe flooding, significant future flood risk, as shown in the Coastal Protection and Restoration Authority's (CPRA) Coastal Master Plan, or sites that are in proximity to a flood source, within the potential land acquisition area of a flood control project, or subject to a disposition or conservation plan by a state or local entity, including a nonprofit or environmental preservation organization may be considered based on funding availability. The program would also target benefits to vulnerable communities or those communities experiencing extensive damage and subject to the potential large-scale relocation of homeowners via buyout and safe housing incentive.

The following are ineligible activities:

- Forced mortgage payoffs

- Funding for owner-occupied second homes (other than buyout programs)
- Assistance for those who previously received federal flood disaster assistance and did not maintain flood insurance where required (other than buyout programs)
- Compensation payments

This multi-pronged approach will assist homeowners based on their progress in the rebuilding process and their capacity to complete that process by offering four program solutions: Program Managed; Homeowner Managed; Reimbursement for completed work prior to damage inspection; and Voluntary buyouts. These four solutions are described in more detail under proposed used of funds section.

This program is modeled after the Restore Louisiana Homeowner Program deployed in response to the Great Floods of 2016.

#### *Program Tieback to Disaster/Unmet Needs*


The Restore Louisiana Homeowner Program assists homeowners with grants to provide assistance to homes that were damaged or destroyed as a direct result of Hurricane Laura and/or Hurricane Delta.

#### *How Program will Promote Housing for Vulnerable Populations*

The Restore Louisiana Homeowner Program seeks to prioritize applications through a phased approach to ensure the most vulnerable populations are served. Additionally, the Program, through specific targeted outreach events, will attempt to reach vulnerable populations with information and available resources regarding the Program.

The criteria of this phased approach is specifically designed to meet the needs of vulnerable populations by addressing criteria such as LMI, age and/or disabilities of applicants in need of assistance in the most impacted areas. The chart below demonstrates how applicants will be prioritized in this program:



 <p><b>RESTORE LOUISIANA</b> Homeowner Assistance Program</p>	<p>Based on current funding limitations and federal guidance, to be placed in a phase, you must have:</p> <ul style="list-style-type: none"> <li>(1) owned and still own the damaged home</li> <li>(2) occupied the home at the time of the disaster</li> <li>(3) sustained major/severe damage (per FEMA)</li> <li>(4) NOT received or expect to receive structural insurance payments greater than \$25k</li> </ul>
--	---

APPLICATION PHASES		PHASE I	PHASE II	PHASE III	PHASE IV	PHASE V	PHASE VI
HOUSEHOLD INCOME	LESS THAN 50% AMI	✓					
	BETWEEN 50% & 80% AMI		✓	✓			
	GREATER THAN 80% AMI				✓	✓	✓
GEOGRAPHY	MOST IMPACTED	N/A	N/A	N/A	✓		N/A
	OTHER IMPACTED					✓	
HOMEOWNER 62+ AND/OR HOUSEHOLD MEMBER WITH DISABILITY	YES	N/A	✓		N/A	N/A	N/A
	NO			✓			
STATUS OF REPAIRS	COMPLETE	N/A	N/A	N/A			✓
	INCOMPLETE				✓	✓	

AMI = AREA MEDIAN INCOME

*Program Affordability Period (if applicable)*

Not applicable in a Homeowner Program

*Program Definition of Second Home/Eligibility*

Second Homes are not eligible in the Restore Homeowner Program. Only homes damaged by the allocated disasters which served as the primary residence of the homeowner are considered for eligibility.

*Program National Objective(s)*

National Objective: Benefits to Low- and moderate-income persons/households or Urgent need.

The Restore Louisiana Homeowner program assists homeowner who are LMI as a priority. However, the State recognizes many homeowners significantly impacted by a disaster may not have been LMI, but are at risk of becoming so following the disaster. Some homeowners still have unmet needs that are best served using the Urgent Need national objective. In the midst of the Nation’s COVID 19 Pandemic it is urgent to consider the goal for homeowners who recover to expeditiously move back into their single-family homes. Not using the urgent need national objective creates great risk of health and welfare of these communities. There is an increased risk of homelessness. Additionally, homeowners whose only choice is to shelter with friends and other family members only increases the potential risk of exposure to this deadly COVID virus. In order for the economy to

recovery and for the overall welfare of the community, housing recovery must be the priority for all impacted families. There is a sense of urgency to complete stronger and more resilient homes to protect the communities against future storms. As Louisiana enters the 2022 hurricane season, it is both critical and urgent to ensure families have the resources necessary to recover, rebuild and reside in their homes preventing the need for concurrent sheltering that could result from another impending disaster. The quicker these programs have the ability to serve the community, the greater the mitigation from future disasters, along with reducing the risk of exacerbating community health and welfare issues.

#### *Program Eligibility*

**Eligible Activity:** Rehabilitation, Reconstruction, Reimbursement, Elevation, Buyouts and Acquisitions (42 U.S.C. 5305(a)(4)); HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(7-8).

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta.

**Eligible Applicants:** Homeowners will be eligible for the program if they meet the following criteria:

- Owner-occupant at time of disaster event
- Damaged property address was the applicant's primary residence at the time of disaster event
- Located in one of FEMA IA declared parishes for Hurricanes Laura and Delta
- Sustained damage as a result of any of the declared disasters
- Eligible structure as determined by program, including but not limited to, single family residences, duplexes, mobile homes, and resilient manufactured (modular) housing units.

#### *Program Responsible Entity*

Administering Entity – State of Louisiana

#### *Program Maximum Assistance*

Maximum Award – Will be determined by the scope of work based on standard/economy grade building materials as calculated by the program using national building standard estimating software, less any duplication of benefits (e.g., NFIP, FEMA or SBA) with a maximum award of \$300,000, excluding any program project delivery costs. Duplication of Benefits is defined further in the program policies and procedures. The state will include details of the program standards in its policies and procedures.

Maximum Award - Buyout and Incentive (Solution 4) is \$250,000

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable

*Program Method of Distribution Description/Overview (if applicable)*

As applicable and within its policies and procedures on a program-by-program basis, the state or its sub grantees will provide assistance to eligible homeowners through one of four program tracks, which homeowners will choose at the time of application:

- **Program Managed (Solution 1):** The state manages and completes the construction process for the rehabilitation or reconstruction of damaged homes on behalf of homeowners. The state will contract with a pool of contractors and assign them to repair or reconstruct damaged properties in a resilient manner. The state will require contractors to provide Solution 1 grantees with a one year warranty on construction. Notifications reminding homeowners of the expiration date of the warranty will be sent to homeowners.
- **Homeowner Contracted Program (Solution 2):** Homeowners choose to manage their own rehabilitation or reconstruction process with the state providing construction advisory services for all homeowners in this track. Homeowners will select their own home building contractor(s) and contract directly with homebuilding contractors to rebuild in a resilient manner as well as enter a grant agreement with the state for the CDBG-DR funding. The state will monitor all projects in the Homeowner Contracted Program.
- **Reimbursement (Solution 3):** Homeowners who have completed partial or full repairs to their home before applying to the program may be eligible for reimbursement of eligible expenses incurred prior to application to the program.
- **Voluntary Buyouts (Solution 4):** The state will offer and conduct large-area voluntary buyouts as an allowable mitigation activity (on the block or neighborhood scale) for residents who own property located in repetitive loss areas, areas within FEMA designated floodways, and/or areas subject to moderate or high flood risk. Such buyout programs will include provisions for community-oriented assistance to homeowners in order to facilitate a successful transition to a location of lower flood risk outside of SFHAs.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

The MIT set-aside activities will meet the definition of mitigation (defined as activities that increase resilience to disasters, and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and

suffering and hardship, by lessening the impact of future disaster) by moving residents that are in harm's way to a safer area where loss of life and property is far less likely along with restoring land to its natural state to lessen the impact of future disasters on the surrounding area.

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

The current residents that are at risk are moved out of harm's way and moved to an area of lower risk. Also, the land is returned to its natural state which allows the water to be absorbed by the land which lowers the risk for the surrounding areas that have not been bought out.



## SOFT SECOND MORTGAGE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$5,000,000.00	\$4,000,000.00	\$1,000,000.00

### NARRATIVES

#### *Program Description*

The Soft Second Mortgage Program provides homeownership assistance to first time low- and moderate-income homebuyers by providing soft second mortgages and closing cost assistance to acquire site-built homes outside the Special Flood Hazard Area. This program helps eligible renters to become homeowners in the relatively lower risk areas of storm-impacted parishes, thereby alleviating the rent burden potentially faced by some eligible applicants.

#### *Program Tieback to Disaster/Unmet Needs*

The program transitions LMI households from rental based housing to affordable home ownership, which is a component of addressing the impact of the disasters on availability of affordable rental housing.

#### *How Program will Promote Housing for Vulnerable Populations*

The program directly serves LMI households and assists in decreasing demand on affordable rental housing.

#### *Program Affordability Period (if applicable)*

Not applicable

#### *Program Definition of Second Home/Eligibility*

Not applicable

#### *Program National Objective(s)*

National Objective: Benefits to low- and moderate-income persons or households.

#### *Program Eligibility*

**Eligible Activity:** Direct assistance to facilitate and expand homeownership among persons of low and moderate income. HCDA Sections 105(a)(24)

**Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura and Delta

**Eligible Applicants:** A first-time homebuyer is an individual who meets any one of the following criteria:

- An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This includes a spouse - if either meets the above test, they are considered first-time homebuyers.
- A single parent who has only owned with a former spouse while married.
- An individual who is a displaced homemaker and has only owned with a spouse. A displaced homemaker is a man or woman whose marital status affects their ability to be properly housed.

*Program Responsible Entity*

Administering Entity - The State of Louisiana and/or its subrecipient(s)

*Program Maximum Assistance*

Maximum Award - \$60,000 loan maximum per unit; \$5,000 maximum per unit for down payment and closing costs assistance.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

*Program Competitive Application Overview (if applicable)*

Not applicable

*Program Method of Distribution Description/Overview (if applicable)*

Assistance to eligible applicants will be provided as a soft second loan to cover the gap between the market sale home price and the home price affordable to the qualifying borrower, up to the program cap. Part of the allocated CDBG-DR funds will be offered to the qualifying borrower to cover closing costs and required prepaid items related to the closing of the first mortgage loan. One tenth of the soft second mortgage will be forgiven every year the household maintains the home as their primary residence.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## Infrastructure Programs

### HMGP GLOBAL MATCH PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$35,232,774.00	\$28,186,219.00	\$7,046,555.00

### NARRATIVES

#### *Program Description*

The state will work with eligible applicants and other state agencies to identify the most efficient means of implementing a global match program for approved FEMA's Hazard Mitigation Grant Program (HMGP) projects.

#### *Program Tieback to Disaster/Unmet Needs*

This program addresses the unmet needs for the required non-federal match for the HMGP. The funds will be used for a global match for approved mitigation projects within the MIDs.

#### *How Program will Advance Long-Term Resilience*

HMGP provides funds to implement hazard mitigation measures following a Presidentially Declared Disaster. Hazard mitigation actions are any action taken to reduce or eliminate the long-term risks to people and property from natural hazards. HMGP funding is made available, when authorized, for hazard mitigation planning and projects. HMGP funding is made available to the State (Applicant) based on the estimated total Federal assistance FEMA provides for disaster recovery under the Presidential declaration.

The goal is to **reduce** overall risk to the population and structures from **future** hazard events, while also **reducing reliance** on Federal funding in future disasters.

This CDBG-DR HMGP Global Match Program will enable eligible mitigation projects to participate that would otherwise be unable to provide the required 10 percent non-federal match.

#### *How Program will Address Disaster-Related Storm Water Mgmt/Other Systems*

The State's Hazard Mitigation Plan requires that all eligible applicants for the HMGP funds have a local hazard mitigation plan that includes Stormwater Management.

*Program National Objective(s)*

Benefit to low- and moderate-income persons or households

*Program Eligibility*

Non-federal share 105(a)(9)

*Program Responsible Entity*

State of Louisiana or its subrecipient(s).

*Program Maximum Assistance*

The maximum award is \$15,000,000.00

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

This program will only fund hazard mitigation projects are intended to *strengthen facilities and communities*, making them *less vulnerable* to *future* disaster impacts.

Examples of typical mitigation activities are listed below.

- **Elevation** of flood-prone structures – physically raising an *existing* structure **above** the **base flood elevation** (BFE) or *higher*.
- **Acquisition** of flood-prone structures – “**buyout**” of structures and converting land to **green space** in perpetuity.
- Localized **drainage** improvements – *reduce* **localized** flooding by *increasing* drainage capacity.
- **Safe room** construction – provides *immediate* near **life-safety protection** for either tornado or hurricane winds.
- **Wind retrofit** of structures – hardening the **envelope** of a structure to protect against **high wind loads**. The envelope is the **shell** of the structure (including the doors, roof covering windows and walls) that maintains a dry, heated or cooled **indoor** environment.

*Program Competitive Application Overview (if applicable)*

No competitive process for this program. Eligible projects approved by FEMA will be selected for CDBG-DR global match.

*Program Method of Distribution Description/Overview (if applicable)*

The state will pull project data from the Louisiana Hazard Mitigation Grant Program (LA HM) software. Subrecipients with projects selected to best meet the CDBG-DR eligibility criteria will be required to complete a **Non-Federal Cost Share Assistance Program Application**. The Program Application will capture CDBG-DR required project information not captured in the HM application such as beneficiary data and national objectives.

Using the Program Application, the state will complete an eligibility review, obtain beneficiary information in an attempt to maximize the Low and Moderate Income (LMI) requirement and analyze each project in consideration of HUD MID spending requirements.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

FEMA's Hazard Mitigation Grant Program [through the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP)] provides funds to implement hazard mitigation measures following a Presidentially declared disaster. Hazard mitigation actions under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is meeting the same definition.

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

FEMA's Hazard Mitigation Grant Program provides funding to state, local, tribal and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in their communities. Eligible activities under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is addressing the same risks.

## NONFEDERAL SHARE MATCH PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$150,000,000.00	\$120,000,000.00	\$30,000,000.00

## NARRATIVES

### *Program Description*

Investments in infrastructure repair and rebuilding in areas impacted by Hurricanes Laura and Delta helps to secure investments in housing recovery and bolsters confidence in communities continuing to rebuild. Without assistance to meet the state and local match requirements, the infrastructure and resources typically provided by state and local governments will be severely at-risk, as the state and local governments will be required to either a) forgo assistance from FEMA PA or b) divert funding needed for other community needs toward meeting the match requirements. The state will dedicate funds to offset the burden of the non-federal share match requirements faced by state and local entities and jurisdictions.

### *Program Tieback to Disaster/Unmet Needs*

This program addresses the unmet need for required non-federal match for all awarded FEMA public assistance grants in the eligible MIDs.

### *How Program will Advance Long-Term Resilience*

FEMA encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. The state will support these efforts with the CDBG=DR grantees.

### *How Program will Address Disaster-Related Storm Water Mgmt/Other Systems*

This program will provide non-federal match funding for FEMA Public Assistance grants. Any approved grants that involve systems must be brought up to current applicable codes and local ordinances.

### *Program National Objective(s)*

- Benefit to low- and moderate-income persons or households
- Elimination of slums and blight or
- Urgent Need

Each project worksheet will be reviewed to determine national objective. As discussed in the infrastructure unmet needs, some projects within the Public Assistance program will have had a particular urgency, including existing conditions posing a serious and immediate threat to the health and welfare of the community.

*Program Eligibility*

Eligible Activity - Non-federal share 105(a)(9)

*Program Responsible Entity*

State of Louisiana or its subrecipient(s)

*Program Maximum Assistance*

The maximum award is \$15,000,000.00.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

*Other Program Details*

Eligible Applicants include, but are not limited to, the following entities:

- Parish and municipal governments
- State agencies and authorities
- Schools (K-12) and Universities
- First responders
- Critical infrastructure facilities as defined by FEMA (wastewater and drinking facilities)
- Public Housing Authorities

Other parish and local program applicants eligible to receive federal recovery funds, including eligible private non-profit organizations.

The program policies and procedures may include further project selections and priorities due to funding availability including, but not limited to:

- Most Impacted
- Low-Income Area populations and underserved communities
- Geographical considerations

*Program Competitive Application Overview (if applicable)*

Eligible applicants with local cost-share requirements will apply for funding during a defined application period. Additional criteria for selection will be further determined within the program policies and procedures based on availability of funds and number or type of applications.

*Program Method of Distribution Description/Overview (if applicable)*

Funds will be provided as payment to state agencies, eligible organizations, local governments, or other local entities for eligible activities within approved FEMA projects and programs, including reimbursement of eligible activities. The state will develop a prioritization or proration methodology for disbursing funds to state agencies, local governments, and local nonprofit organizations. The state may prioritize activity type and/or create a funding threshold.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*



## Economic Revitalization Programs

### SMALL BUSINESS LOAN AND GRANT PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$100,455,482.00	\$80,255,586	\$20,063,896

### NARRATIVES

#### *Program Description*

The state will administer a lending program for disaster-impacted small businesses for non-construction related expenses. The state will enter into subrecipient agreements with implementing partners including local community development organizations (non-profit organizations, community development financial institutions, local credit unions, and other eligible organizations). In the event the state is unable to identify local community development organizations that can serve the entire impacted area, the state may issue awards directly to small businesses that meet the program criteria.

#### *Program Tieback to Disaster/Unmet Needs*

This program addresses the unmet needs for small business recovery and will fund for-profit businesses and private non-profit organizations located in eligible MIDs impacted by the disaster.

#### *Program National Objective(s)*

- Low Mod Job Creation or Retention Activities
- Low Mod Area Benefit
- Low Mod Limited Clientele

#### *Program Eligibility*

##### **Program Eligible Activities:**

Section 105(a)8, 105(a) 14-15, 105(a) 17 and 105(a)21-22

##### **Eligible Applicants:**

For-profit businesses and private non-profit organizations located in HUD MID areas.

*Program Responsible Entity*

Administering Entity - State of Louisiana or its subrecipient(s)

*Program Maximum Assistance*

The program will provide standard awards of a maximum of \$50,000, with exceptions allowing for up to a maximum award of \$150,000.

The state will include its exceptions policy in the program policies and procedures.

*Program Estimated Begin and End Dates*

The state estimates the start and end dates will be August 1, 2022 - July 31, 2028

*Other Program Details*

The state understands that residential communities cannot fully recover and thrive without businesses returning to the community, as they provide essential services and employment to local residents. It is imperative that the state invest in those businesses that support recovering neighborhoods, provide local employment opportunities and produce the foods consumed directly or indirectly by local residents. The state has prioritized businesses that experienced physical or financial losses as a result of the disaster and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

**Ineligible Activities:** Forced mortgage payoffs; SBA home/business loan payoffs; funding for second homes; assistance for those who previously received Federal flood disaster assistance and did not maintain flood insurance; and compensation payments.

**SBA Declined Loans:** Business owners approved for SBA loans who declined their loans or have drawn less than the full amount of the approved SBA loans will be reviewed for eligible award amounts and duplication of benefits, per the state's program policies and procedures.

**Criteria for Selection:**

The first allocation will prioritize assistance to businesses that:

- Were operating prior to the disaster
- Employ 1 to 50 full time equivalent employees
- Generate a minimum of \$25,000 annual gross revenue
- Were directly impacted by the disaster, as a documented physical or financial loss

- Are located in the most impacted parishes (at least 80 percent of allocation will be dedicated to these parishes and to the remaining funds will be allocated to other impacted parishes)
- Provide essential goods or services necessary for the immediate and long-term housing and community recovery, which will be detailed in the program policies and procedures. Such goods and services may include grocery stores, pharmacies, healthcare providers, gas stations, residential construction-related companies, child care providers and locally-owned restaurants or residential service providers.
- Are located in or provide services to vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity as illustrated by the Social Vulnerability Index (SoVI).

*Program Competitive Application Overview (if applicable)*

Funds will be awarded through a competitive Notice of Funding Availability (NOFA) process.

Subrecipients will identify within their respective service areas underserved communities as indicated in the Notice for the purpose of affirmative marketing measures and technical assistance in the application process

*Program Method of Distribution Description/Overview (if applicable)*

Individual loans will be up to 40 percent forgivable, 60 percent fully repayable. Loan rates will be zero- to low-interest, amortized and repaid over a term outlined in the program policies and procedures. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures.

*How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)*

*How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)*

## 5. APPENDIX

---

4/27/22, 9:50 AM

DRGR

- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

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

Signed by  Date 4/28/22  
Jay Dardenne, Commissioner of Administration

## A. CERTIFICATIONS

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:
  1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).



2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
  - a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
  - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee’s

implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.

- n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA’s most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

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

## B. WAIVERS

*(Waiver requests apply to all current and future allocations for 2020 and 2021 disasters)*

### 1. 42 USC 5304(D)(3) ONE FOR ONE REPLACEMENT (PREVIOUSLY APPROVED)

OCD is requesting that HUD expand the waiver of 42 USC 5304(d)(3) and 24 CFR 42.375 to include all CDBG-MIT funded residential buyout properties of the one-for-one replacement requirement. The current waiver is located in Section IV.F.1 of the Consolidated Notice.

Generally, the one-for-one replacement requirements of 42 USC 5304(d)(3) and 24 CFR 42.375 are designed to prevent the net reduction of affordable housing units in a community in order to avoid the unintentional displacement of residents with a low- to- moderate income due to unavailability of affordable units.

In allocations of CDBG Disaster Recovery funds as well as the CDBG Mitigation funds, HUD has waived the requirement for homes that have been damaged and are deemed not suitable for rehabilitation. The waiver is based on the realization that the requirements:

Do not account for the large, sudden changes that a major disaster may cause to the local housing stock, population, or economy. Disaster-damaged housing structures that are not suitable for rehabilitation can pose a threat to public health and safety and to economic revitalization.

OCD submits the waiver should be extended to CDBG-MIT buyout programs overall (not just storm damaged properties), as the requirements are similarly inconsistent with the fundamental purpose of CDBG-MIT-funded buyouts. The material reason for the buyout is that the structure is in an at-risk areas and the structure should be removed to prevent future damage.

In OCD's model of MIT-funded buyout, the buyout amount can be coupled with a Safe Housing Incentive Grant, through which an eligible low- to moderate income households is provided the financial means to relocate to a safer area. Residential buyout projects for the purpose of flood mitigation, by design, remove units from the local real estate/rental market when those units are subject to substantial risk of flooding in the future.

The geographic areas upon which the CDBG-MIT buyouts focus are those that are unsafe for housing due to the susceptibility of flooding. It would be inappropriate to construct new affordable units in neighborhoods subject to substantial flood risk, as that would be a new investment in property likely to flood and placing future residents at risk. When residential buyout projects are used as a mitigation strategy to address future flood risk, they are intended to occur prior to anticipated future damage to the units. Thus, not all of the homes eligible for the buyout are currently storm damaged. However, simply based on their eligibility for a mitigation based buyout program, they should be subject to the waiver of the one-for-one replacement requirement as they prevent damage to, rather than enable recovery from, the damage of such units.

The one-for-one replacement requirement, when applied to the buyout of flood-prone property, would result in investment of the rough equivalent of the fair market value of the home subject for buyout and the additional applicable safe housing incentive in order to facilitate relocation of the residents to a safer location, **and** an additional investment of funds to construct a new affordable unit mitigated to avoid the flood risk in the subject area. This compound cost would discourage the use of buyouts as a mitigation strategy and would make buyout projects cost prohibitive.

The best practices in the residential buyout or acquisition of land to mitigate flood risk factor into a larger or more comprehensive strategy to concentrate residential development in safer areas, while reducing residential development density in areas at severe flood risk. A "make room for the water" approach means that buyouts are employed in a way to discourage further development in high-risk flood zones. The requirement to construct new affordable units in the recipient's jurisdiction; to the extent feasible and consistent with other statutory priorities, within the same neighborhood as the units replaced would conflict with a comprehensive strategy to avoid the continued residential development of areas at high risk of flooding.



## C. SUMMARY AND RESPONSE OF PUBLIC COMMENTS

The Public comment period initially began on February 18, 2022. The plan had modifications to include HUD's announcement of additional funding and change in MIDs. These changes were to inform the public of the expected increase and how the State would modify the budget through an amendment. The change was made on April 1, 2022. Therefore, OCD extended the public comment period another 30 days which officially ended on May 1, 2022. After the public comment period ended, the state prepared responses to the comments. A summary of the comments and responses were added to the Action Plan for submittal to HUD as an attachment in the supporting document section. Additionally, these comments and responses were posted publicly on the OCD website. The comments and responses can be found under supporting documents titled: L\_D\_PC\_FromAP\_Public\_Hearing\_Combined\_compressed.pdf.

## D. DATA SOURCES/METHODOLOGIES

## E. IMPORTANT DEFINITIONS AND TERMS

AMI: Area Median Income

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant- Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Participation

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

HCD Act: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credit

LMI: Low and moderate-income



NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

### OCD COMMON ACRONYMS

- **ABFE** Advisory Base Flood Elevation
- **AEP** Annual Exceedance Probability (of a flood)
- **AP** Action Plan
- **CDBG-MIT** Community Development Block Grant-Mitigation
- **CFR** Code of Federal Regulations
- **COVID-19** Coronavirus 2019 global pandemic
- **CPD** HUD Office of Community Planning and Development
- **CPRA** Coastal Protection and Restoration Authority
- **DEQ** Louisiana Department of Environmental Quality
- **DOA** Division of Administration
- **DOTD** Louisiana Department of Transportation and Development
- **DR** Disaster Recovery
- **FIRM** Flood Insurance Rate Maps
- **FRN** Federal Register Notice
- **GOHSEP** Governor's Office of Homeland Security and Emergency Preparedness
- **HUD** U.S. Department of Housing and Urban Development
- **LED** Louisiana Economic Development
- **LDAF** Louisiana Department of Agriculture and Forestry
- **LDWF** Louisiana Department of Wildlife and Fisheries
- **LSU** Louisiana State University
- **LTRS** Long-Term Recovery Subcommittee
- **NDRF** National Disaster Recovery Framework
- **NFIP** National Flood Insurance Program
- **NOFA** Notice of Funding Availability



- **OCD** Louisiana Office of Community Development
- **QPR** Quarterly Performance Reports
- **RSF** Recovery Support Function
- **SHMP** State Hazard Mitigation Plan
- **USDA** U.S. Department of Agriculture

## F. STANDARD FORM 424.

The Signed SF-424 was emailed to HUD on 5/3/2022 due to the size of the file.

## 6. ATTACHMENTS

### I. OCD DISASTER OUTREACH MEETINGS, 2020 AND 2021

#### 2020/2021 Disasters Outreach Meetings

DATE	HOST	ATTENDEES	PURPOSE
<b>November 5 &amp; 6, 2020</b>	Louisiana Office of Community Development	All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc.	Sessions 1 - Just-In-Time (JIT) Recovery Training conducted by OCD/FEMA/GOSHEP
<b>November 19, 2020</b>	Calcasieu Parish	Calcasieu Parish officials, OCD, GOSHEP, FEMA	Calcasieu/State/FEMA Meeting re: Long Term Recovery Priorities
<b>January 8, 2021</b>	Louisiana Office of Community Development	OCD/GOSHEP/FEMA, Calcasieu Parish, Rowdy Gaudet/Emergent Method	To discuss support & training needs for Calcasieu's organization of local RSF chairs/committee, consistent with the NDRF, & process forward
<b>January 13 &amp; 14, 2021</b>	Louisiana Office of Community Development	All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc.	Session 2 - Just-In-Time (JIT) Recovery Training OCD/FEMA/GOSHEP
<b>February 4, 2021 and March 11, 2021</b>	Louisiana Office of Community Development/RSF 1 Planning & Capacity	OCD, GOSHEP, FEMA, Federal partners SWLA officials, AIA, APA, CPRA, IMCAL	RSF 1 full meetings/technical assistance Laura recovery issues with SWLA

		Planning District, LSU, Water Institute, Watershed	
<b>February 11, 2021</b>	Calcasieu Parish	All local Calcasieu parish RSF co-chairs & committee members, OCD, GOSHEP, FEMA	Kick-Off/Training for Calcasieu Parish RSF/NDRF Orientation Meeting
<b>March 8, 2021</b>	Louisiana Office of Community Development	SWLA Foundation, OCD housing staff, P. Forbes	Technical assistance for SWLA Foundation in launching Calcasieu/Cameron Long Term Recovery Planning process with specific focus on housing
<b>April 6 &amp; 7, 2021</b>	Louisiana Office of Community Development	All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc.	Session 3 - Just-In-Time (JIT) Recovery Training OCD/FEMA/GOSHEP
<b>March 25, 2021 &amp; April 8, 2021</b>	IRC OCD/GOSHEP/FEMA	Calcasieu Parish key staff & local RSF co-chairs, R. Gaudet/Emergent Method	Updates/technical assistance needed on issues re: Calcasieu Parish RSF committee planning process
<b>April 14, 2021</b>	Louisiana Office of Community Development	Calcasieu/Lake Charles/Cameron officials/staff, AIA, DOTD, McNeese University. SWLA Foundation, IMCAL, DOTD, AIA, All Impacted Laura Communities	Set up demonstration of FEMA Mitigation Tool to use in SWLA planning/recovery
<b>April 21 &amp; 22, 2021</b>	Louisiana Office of Community Development/RSF 1/AIA	Statewide architects, engineers, RSF 1 members, All impacted Laura/Delta/Zeta Communities	Two-day Resiliency Summit/Training



<p><b>May 27, July 7, July 21, July 29, August 6, August 12, August 19, September 2, October 28, 2021***</b></p> <p><b>***Event(s) deferred by all parties re: Calcasieu rollout of rental program, Hurricane Ida impacts, etc. Update – Summit/Resource Fairs for Laura/Delta/Zeta and Ida now scheduled spring 2022</b></p>	<p>Louisiana Office of Community Development</p>	<p>SWLA Foundation, Calcasieu Parish, HUD, OCD, GOSHEP, FEMA</p>	<p>Planning meetings to identify housing needs, Summit topics/speakers and Interactive resources for Resource Fair for impacted residents.</p>
<p><b>June 2, 2021</b></p>	<p>Louisiana Office of Community Development</p>	<p>All Laura/Delta/Zeta Impacted communities, CISA, GOSHEP LA Planning Districts, McNeese State University LMA, LSU, Watershed, CPRA, Public Service Commissioners</p>	<p>Set up briefing on “Increasing the Resilience of Electrical Systems in LA To Offset Hurricanes And Other Hazards” conducted by Cybersecurity and Infrastructure Security Agency</p>
<p><b>June 20, 2021</b></p>	<p>Louisiana Office of Community Development/RSF 1</p>	<p>SWLA officials/staff, All other Laura/Delta/Zeta impacted communities, SWLA Foundation, IMCAL, AIA, APA, LFMA, LA GIS Council, GOSHEP, FEMA, HUD CISA, Watershed, LA Planning Districts, Auburn University, FEMA</p>	<p>Data Template Task Force kick-off meeting to discuss initiative to develop data templates – capacity/planning, economic development, health &amp; human resources, housing, infrastructure &amp; cultural/natural resources - to enable the state and local communities to assess</p>

			vulnerability relative to (flood) risk, develop mitigation strategies, have access to data for federal/philanthropic grant support, etc.
<b>July 27, 2021</b>	Louisiana Office of Community Development	Cameron Parish officials and staff	Special meeting set up for Cameron Parish to present/discuss Cameron Parish Coast A Zone Advisory Flood Information to use for planning purposes by FEMA Mitigation Section.
<b>February – August 2021</b>	Calcasieu Parish Government	Calcasieu Parish Recovery Framework Recovery Support Function groups and various stakeholders	To facilitate and inform the development of Community Recovery Plan
<b>August 11, 2021</b>	Louisiana Office of Community Development	OCD/Calcasieu Parish officials and Recovery Support Function members	Virtual briefing regarding the compilation of the Calcasieu Parish Long-Term Community Recovery Plan
<b>October 27, 2021</b>	Louisiana Office of Community Development	Calcasieu Parish/Lake Charles/Cameron, other SWLA Laura impacted communities, SWLA Foundation, IMCAL Water Institute, Watershed Initiative	Briefing by National Park Service re: updates on project opportunities for SWLA region re: watershed, nature-based solutions
<b>November 9, 2021</b>	Louisiana Office of Community Development/FEMA	Calcasieu Parish officials/staff, IRC OCD/GOSHEP/FEMA	To discuss SOW with Calcasieu Parish for contract support through FEMA, as part of the IRC Laura Recovery efforts, for identifying housing strategies to address

			blight, affordable housing, etc.
<b>November 9, 2021</b>	Louisiana Office of Community Development	Federal/local/parish officials in areas impacted by federally declared disasters from 2020-2021	Virtual and in-person briefing to provide input on federal recovery resources, including D-CDBG
<b>November 23, 2021</b>	Louisiana Office of Community Development	OCD/Calcasieu Parish officials	Virtual briefing to provide status of federal CDBG funding
<b>December 6, 2021</b>	SWLA Foundation	Members of the Master Plan Advisory Council (OCD member) for the Calcasieu/Cameron 50-Year Long Term Recovery Plan – OCD, locally elected officials, Economic Develop Council, IMCAL	In-person meeting to review implementation schedule, public meeting outreach strategies, responsibilities of the Council to validate/priority top ten priorities emanating from public input.
<b>December 14, 2021</b>	Louisiana Office of Community Development	Statewide local/parish officials in areas impacted by federally declared disasters from 2020-2021	Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates
<b>December 16, 2021</b>	Louisiana Office of Community Development	Statewide local/parish officials in areas impacted by federally declared disasters from 2020-2021	Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates
<b>January 19, 2022</b>	Louisiana Office of Community Development	Calcasieu/Cameron officials and staff	Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates
<b>January 25, 2022</b>	Louisiana Office of Community Development	GOHSEP's Hurricane Laura Direct Housing Recertification team	To identify unmet needs





<b>January 26, February 3, 2022</b>	SWLA Foundation	Master Plan Advisory Council/OCD	Working meetings based on public input, resulting in the identification of the top ten (10) cross-cutting recovery priorities for the 50-year long term recovery plan.
<b>February 16, 2022</b>	Louisiana Office of Community Development***  ***Two others being scheduled with Vermilion Parish Economic Development Council (economic development focus) and Kisatchie Delta Planning District (watershed).	City of Lafayette, Acadiana Planning Commission, OCD, Watershed Initiative, GOSHEP, EPA, FEMA	To discuss technical assistance to be provided Lafayette as a result of Letter of Interest submitted for assessing best placement for watershed projects

## Emergency Rental Assistance Program Outreach

DATE	HOST	ATTENDEES	PURPOSE
<b>January 20, 2021</b>	Louisiana Office of Community Development	Louisiana statewide/local elected and appointed government officials	Statewide virtual briefing about federal CDBG Emergency Rental Assistance Program funding
<b>January 21, 2021</b>	Louisiana Office of Community Development	Louisiana statewide parish government officials	Statewide virtual briefing about federal CDBG Emergency Rental Assistance Program funding
<b>January 22, 2021</b>	Louisiana Office of Community Development	Housing advocate stakeholders	Statewide virtual round table discussion about federal CDBG Emergency Rental

			Assistance Program funding
<b>March 29, 2021</b>	Louisiana Office of Community Development	Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program	Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding
<b>March 31, 2021</b>	Louisiana Office of Community Development	Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program	Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding
<b>April 6, 2021</b>	Louisiana Office of Community Development	Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program	Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding
<b>April 8, 2021</b>	Louisiana Office of Community Development	Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program	Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding
<b>May 11 and 13, 2021</b>	Louisiana Office of Community Development	Property owner, realtor, and landlord stakeholders	Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding for property owners
<b>May 12, 2021</b>	Louisiana Office of Community Development	Statewide Utility Providers	Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding with utility expansion



<b>June 4, 2021</b>	Louisiana Office of Community Development	Statewide Utility Providers	Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding with utility expansion
<b>May 2021 – June 2021 (bi-weekly)</b>	Louisiana Office of Community Development	Local government official representing parishes administering their own Emergency Rental Assistance Programs	Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding to 7 local government official representing parishes administering their own Emergency Rental Assistance Programs
<b>June 1, 2, 3, 7, 8, 11, 14, and 18, 2021</b>	Louisiana Office of Community Development	Members of the public seeking CDBG assistance at ten in-person Emergency Rental Assistance Program application assistance events	Provide in-person help in ten Louisiana communities to members of the general public applying for CDBG Emergency Rental Assistance
<b>August 31, 2021</b>	Louisiana Office of Community Development	Louisiana Bar Association members for Continuing Legal Education session	Provide Louisiana judges and court representatives with resources and information about CDBG Emergency Rental Assistance funding
<b>August 3, 2021</b>	Louisiana Office of Community Development	Louisiana Association of United Ways	Provide information, talking points, and FAQs related to the CDBG Emergency Rental Assistance Program funding for renters and landlords for statewide 211 helpline.

## II. UNMET HOUSING NEEDS

To calculate unmet housing needs, the state broadly analyzed populations in four distinct categories: 1) wind-damaged homeowners reported not to carry a hazard insurance policy; 2) wind-damaged homeowners reported to carry a hazard insurance policy; 3) flood-damaged homeowners reported not to carry an NFIP policy; 4) flood-damaged homeowners reported to carry an NFIP policy. For the purposes of this analysis, the state assumes populations carrying an insurance policy appropriate to their type of documented storm damages will have 80 percent of their damages covered by their insurance policies. Therefore, needs for these populations have been discounted to 20 percent of those for uninsured populations. Unmet needs for renter households are calculated by proportion from the final homeowner unmet needs.

Moreover, this analysis contemplates known sources of assistance. For example, 'FVL-HA' calculates the difference between a recorded FEMA Verified Loss and Housing Assistance disbursed through the FEMA IA program. Then, once a damage multiplier is applied to that remainder based on differences in FEMA and SBA inspections, approved SBA loan totals are subtracted from the needs total prior to calculating an unmet need total for each of the four respective populations. Lastly, only Major-Severe damage categories are used in the calculation of Unmet Needs. The following sets of tables include calculations of Unmet Housing Needs for the following models:

### LAURA

WIND-DAMAGED HOMEOWNERS (UNINSURED)						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	263	\$7,226,397.37	3.1	\$22,445,863.86	\$(2,898,300.00)	\$19,547,563.86
Major-High	401	\$2,580,801.18	7.9	\$20,429,311.91	\$(3,289,600.00)	\$17,139,711.91
Major-Low	3,254	\$10,359,376.19	8.8	\$90,805,778.17	\$(23,358,000.00)	\$67,447,778.17
Minor-High	3,716	\$5,896,554.89	11.7	\$69,134,099.64	\$(15,363,600.00)	\$53,770,499.64
Minor-Low	3,537	\$2,031,859.74	21.4	\$43,507,243.38	\$(9,446,600.00)	\$34,060,643.38
Total	11,171	\$28,094,989.37		\$246,322,296.96	\$(54,356,100.00)	\$191,966,196.96
Major-Severe Only	3,918	\$20,166,575	20	\$133,680,954	\$(29,545,900)	\$104,135,054

WIND-DAMAGED HOMEOWNERS (INSURED)						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	40	\$2,319,760.78	3.1	\$7,205,393.23	\$(1,998,200.00)	\$1,041,438.65

Major-High	34	\$612,554.97	7.9	\$4,848,911.51	\$(562,600.00)	\$857,262.30
Major-Low	776	\$8,477,599.59	8.8	\$74,310,944.37	\$(14,205,200.00)	\$12,021,148.87
Minor-High	1487	\$8,050,098.83	11.7	\$94,383,304.32	\$(13,048,045.00)	\$16,267,051.86
Minor-Low	1431	\$2,308,702.56	21.4	\$49,435,146.63	\$(9,385,100.00)	\$8,010,009.33
Total	3,768	\$21,768,716.73		\$230,183,700.05	\$(39,199,145.00)	\$38,196,911.01
Major-Severe Only	850	\$11,409,915	20	\$86,365,249	\$(16,766,000)	\$13,919,850

<b>FLOOD-DAMAGED HOMEOWNERS (UNINSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	108	\$2,454,344.69	3.1	\$7,623,423.40	\$(1,263,000.00)	\$6,360,423.40
Major-High	74	\$1,013,904.97	7.9	\$8,025,949.86	\$ -	\$8,025,949.86
Major-Low	296	\$1,531,813.96	8.8	\$13,427,213.77	\$(978,400.00)	\$12,448,813.77
Minor-High	111	\$292,764.25	11.7	\$3,432,511.56	\$(450,000.00)	\$2,982,511.56
Minor-Low	99	\$84,083.93	21.4	\$1,800,449.08	\$(249,600.00)	\$1,550,849.08
Total	688	\$5,376,911.80		\$34,309,547.68	\$(2,941,000.00)	\$31,368,547.68
Major-Severe Only	478	\$5,000,064	20	\$29,076,587	\$(2,241,400)	\$26,835,187

<b>FLOOD-DAMAGED HOMEOWNERS (INSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	38	\$1,910,881.83	3.1	\$5,935,377.09	\$(1,325,300.00)	\$922,015.42
Major-High	24	\$386,517.79	7.9	\$3,059,628.36	\$(414,300.00)	\$529,065.67
Major-Low	55	\$502,044.33	8.8	\$4,400,701.86	\$(611,900.00)	\$757,760.37
Minor-High	8	\$53,735.63	11.7	\$630,022.86	\$(77,800.00)	\$110,444.57
Minor-Low	12	\$23,341.41	21.4	\$499,798.48	\$(143,800.00)	\$71,199.70
Total	137	\$2,876,520.99		\$14,525,528.66	\$(2,573,100.00)	\$2,390,485.73
Major-Severe Only	117	\$2,799,444	20	\$13,395,707	\$(2,351,500)	\$2,208,841

## DELTA

<b>WIND-DAMAGED HOMEOWNERS (UNINSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	41	\$1,623,187.32	2.8	\$4,489,968.26	\$ -	\$4,489,968.26
Major-High	65	\$714,065.98	5.8	\$4,148,050.40	\$(271,500.00)	\$3,876,550.40
Major-Low	593	\$2,776,990.54	9.0	\$25,055,714.19	\$(1,396,700.00)	\$23,659,014.19
Minor-High	994	\$1,890,471.02	9.8	\$18,567,258.24	\$(1,141,700.00)	\$17,425,558.24
Minor-Low	1,310	\$592,855.82	22.6	\$13,392,101.97	\$(1,139,500.00)	\$12,252,601.97
<b>Total</b>	<b>3,003</b>	<b>\$7,597,570.68</b>		<b>\$65,653,093.05</b>	<b>\$(3,949,400.00)</b>	<b>\$61,703,693.05</b>
Major-Severe Only	699	\$5,114,244	18	\$33,693,733	\$(1,668,200)	\$32,025,533

<b>WIND-DAMAGED HOMEOWNERS (INSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe						
Major-High	6	\$118,656.15	5.8	\$689,280.41	\$ -	\$137,856.08
Major-Low	61	\$701,209.66	9.0	\$6,326,744.21	\$(216,900.00)	\$1,221,968.84
Minor-High	227	\$825,486.44	9.8	\$8,107,513.81	\$(605,100.00)	\$1,500,482.76
Minor-Low	407	\$555,829.43	22.6	\$12,555,707.73	\$(1,593,400.00)	\$2,192,461.55
<b>Total</b>	<b>701</b>	<b>\$2,201,181.68</b>		<b>\$27,679,246.16</b>	<b>\$(2,415,400.00)</b>	<b>\$5,052,769.23</b>
Major-Severe Only	67	\$819,866	18	\$7,016,025	\$(216,900)	\$1,359,825

<b>FLOOD-DAMAGED HOMEOWNERS (UNINSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	33	\$973,775.67	2.8	\$2,693,602.76	\$(342,100.00)	\$2,351,502.76
Major-High	79	\$919,757.40	5.8	\$5,342,923.70	\$(684,900.00)	\$4,658,023.70
Major-Low	387	\$1,852,660.84	9.0	\$16,715,843.94	\$(2,120,000.00)	\$14,595,843.94
Minor-High	100	\$171,493.27	9.8	\$1,684,320.89	\$(50,000.00)	\$1,634,320.89
Minor-Low	118	\$108,110.79	22.6	\$2,442,129.56	\$(359,000.00)	\$2,083,129.56

Total	717	\$4,025,797.97		\$28,878,820.85	\$(3,556,000.00)	\$25,322,820.85
Major-Severe Only	499	\$3,746,194	18	\$24,752,370	\$(3,147,000)	\$21,605,370

<b>FLOOD-DAMAGED HOMEOWNERS (INSURED)</b>						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	7	\$211,551.67	2.8	\$585,182.17	\$ -	\$117,036.43
Major-High	15	\$285,888.55	5.8	\$1,660,743.05	\$(222,100.00)	\$287,728.61
Major-Low	122	\$1,077,056.01	9.0	\$9,717,860.81	\$(579,200.00)	\$1,827,732.16
Minor-High	24	\$135,261.84	9.8	\$1,328,473.96	\$(71,100.00)	\$251,474.79
Minor-Low	16	\$20,106.08	22.6	\$454,179.02	\$(84,500.00)	\$73,935.80
Total	184	\$1,729,864.15		\$13,746,439.01	\$(956,900.00)	\$2,557,907.80
Major-Severe Only	144	\$1,574,496	18	\$11,963,786	\$(801,300)	\$2,232,497

### III. IMPACT ON HOMELESS POPULATIONS

The impact of natural disasters on the housed population and on people experiencing sheltered homelessness is very different from the impact on people experiencing unsheltered homelessness.

When a natural disaster damages a housing unit, its inhabitant can hypothetically be made whole by insurance or FEMA.

When a natural disaster damages a shelter or broader infrastructure, beds can be rendered uninhabitable, but eventually, those beds can be regained via repair and recovery operations.

For people experiencing unsheltered homelessness (e.g. living on the streets), however, the impact is more difficult to see. A natural disaster cannot remove housing or shelter from a person without housing or shelter; instead, it destroys future housing opportunities. One of the primary barriers to permanent housing in any geography is a lack of affordable housing. When a natural disaster damages or destroys more than half of an area's affordable housing, as Hurricanes Laura and Delta did in Lake Charles and Hurricane Ida in Houma, it creates a housing cost and availability crisis that prevents people experiencing homelessness from achieving and stabilizing permanent housing.

### 2020 and 2021 Storms

The 2020 and 2021 hurricanes that devastated Louisiana will leave a legacy on homelessness in the state. For the estimated 50% of people experiencing homelessness who could return to housing without a public subsidy, there will no longer be housing available.

The Point-in-time (PIT) Count is an annual census of sheltered and unsheltered homeless persons on a single night conducted by Continuums of Care (CoC) across the United States

<https://www.hudexchange.info/programs/hdx/pit-hic/>. Louisiana has seven Continuums of Care, which are regional planning bodies that coordinate housing and services for people experiencing homelessness

<https://laboscoc.org/housing-and-services>. Hurricanes Laura, Delta, and Zeta of 2020 primarily impacted parishes in the Louisiana Balance of State Continuum of Care (LA BOSCO)C's Lake Charles Region, although it also impacted the Monroe, Lafayette, CENLA, LA BOSCO Natchitoches/Sabine Region and CENLA CoCs. Hurricane Ida impacted parishes in the LA BOSCO C's Houma, Baton Rouge and St. Bernard/Plaquemines Regions, while also leaving significant damage in Unity and Northlake's CoCs.

## Point in Time (PIT) Count Data -- Homelessness in Impacted Parishes

CONTINUUMS OF CARE CONTAINING FEMA IA DECLARED PARISHES	2017	2018	2019	2020
LA BOSCO: Includes Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes	706	575	593	757
Monroe CoC: includes Jackson, Lincoln, Morehouse, Ouachita & Union Parishes	185	187	188	162
CENLA CoC: includes Grant, LaSalle, Rapides, Vernon & Winn Parishes	159	177	114	107
Unity CoC: includes Jefferson and Orleans Parishes	1,301	1,188	1,179	1,314
Lafayette CoC: includes Acadia, St. Landry, St. Martin & Vermilion	357	363	360	417
Northlake CoC*: includes Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes	248	194	215	118
Total PIT Count **	2,956	2,684	2,649	2,875

\* CoC-wide PIT data includes both impacted and non-impacted parishes. Note that 2018 and 2019 saw snow and sleet on the PIT Count date (unusual in Louisiana), which likely depressed results.





*\*\*To date, some providers in the following FEMA IA declared parishes have not yet reported financially recoupable damages: Caddo (Shreveport CoC), Natchitoches and Sabine (LA BOSCOB Natchitoches/Sabine Region)*

## LA BOSCOB Regions

According to the Southwest Louisiana AIDS Council (SLAC), one of the best-funded service providers in the Lake Charles region, more than 50% of their 425 participants were displaced.

In the Houma Region, Terrebonne Parish Consolidated Government reported \$750,000 in damage to their shelter for women and children. The Haven Domestic Violence shelter in this region saw estimated damages of approximately \$10,000 to their facility. And approximately 50% of participants in permanent supportive housing and rapid rehousing programs saw damages to their units and now have to search for new housing in a region with an already depleted housing inventory. Just weeks prior to Ida making landfall, 60 households were referred to a permanent housing provider and in the weeks following the storm, only about 20 of them have been able to be contacted, most likely displaced to other regions of the state.

Meeting LA BOSCOB's Unmet Need requires **\$9,697,600** to reopen 208 ES beds (traditional), create 300 ES beds (NCS) for displaced people, repair outreach and drop-in centers that serve approximately 100 households per month, and add six full time street outreach workers to divert people from the overloaded and diminished homeless response network.

## Monroe CoC

This CoC's emergency shelter bed availability was already inadequate before the COVID-19 pandemic; post-pandemic, shelter bed availability dropped 25.2% (25 beds) due to implementing HUD's social distancing best practices and due to canceled annual fundraising events. Moreover, three of four parishes impacted by Hurricane Laura have no shelter beds at all.

Meeting Monroe CoC's Unmet Need requires \$500,000 to create 40 new shelter beds in Laura -impacted or -adjacent parishes.

## CENLA CoC

This CoC only has two street outreach workers to cover a total PIT population of 114 across more than six parishes, ensuring chronic under-counting in rural parishes. ES availability is particularly limited for women and families with children; the only available resource is hotel vouchers, which are unsustainably expensive.

The CENLA CoC also hosted Louisiana’s largest congregate disaster shelter in Rapides Parish, the “Alexandria Megashelter.” This has two primary impacts during and after a disaster:

1. All available hotel rooms and other housing stock were absorbed by shelter and disaster response workers;
2. The megashelter was disproportionately likely to attract and then locally discharge people experiencing homelessness.

Meeting CENLA CoC’s Unmet Need requires \$845,000 to add four full time outreach and diversion staff to rapidly identify people experiencing or at risk of homelessness and divert them away from more expensive interventions; and to maintain 60 Rapid Rehousing beds beyond 2020-2021 to ensure households do not return to homelessness.

## Lafayette CoC

Hurricane Laura evacuees and temporary workers utilized most of the available (and nearly all of the affordable) housing units in all impacted parishes. While no homeless services facilities were damaged by Hurricane Laura, the local network was at capacity before the disaster; since April 2020, CoC-wide homelessness had increased 83% and ES bed availability had decreased 68%. The impacted parishes were unable to shelter or house any additional people who lose or have lost housing due to Hurricane Laura, and the housing and shelter crisis will only increase as non-congregate shelters ramp down.

Meeting the Lafayette CoC’s Unmet Need requires \$980,000 to create 33 ES beds sufficient to meet the post-disaster unsheltered via existing structures, and to create 100 Rapid Rehousing beds to permanently house existing NCS participants to prevent additional strain as the system absorbs people impacted by Hurricane Laura.

## Total Homeless Population Unmet Need for 2020 and 2021 Hurricanes:

In summation, \$12,172,605 is needed to:

- repair damage to existing resources, including structures and equipment;
- create new emergency shelter beds in existing structures, including non-congregate shelter, required to shelter people displaced by Hurricanes Laura and Ida;
- repair outreach and drop-in centers required to serve people experiencing unsheltered homelessness; and

- hire additional outreach workers and resource navigators to ensure people who are imminently at risk of homelessness are diverted back to permanent housing, including via homelessness prevention direct assistance.

## IV. PUBLIC COMMENT RESPONSES

### 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 completet 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.

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.

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.

Construction standards: I applaud the green and energy standards mentioned, but I want to make sure the the construction standards include Fortified Building standards,

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.

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 in inequitable.

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?

And will small, local nonprofits be able to receive the hazard mitigation funding to help their existing clients?

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.

And finally, once repair and/or mitigation work has been done on a persons 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.

**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).

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

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.

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.

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.

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.

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](mailto:julie@smarthomeamerica.org) with any questions. Sincerely,

Julie Shiyu-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 the 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](mailto: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:

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.

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.

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.<sup>14</sup> 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.

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.

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.<sup>15</sup> The state's targeting metrics for the RLHP should help address this with regard to homeownership, however, there must be a complimentary commitment to

---

<sup>14</sup> *The Gap: A Shortage of Affordable Rental Homes*, National Low Income Housing Coalition, 2019, Available: <https://reports.nlihc.org/gap/2019/la>.

<sup>15</sup> 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/](http://www.datacenterresearch.org/reports_analysis/rigging-the-real-estate-market-segregation-inequality-and-disaster-risk/).



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.<sup>16</sup> 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.

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.

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.

---

<sup>16</sup> Raley Pellittieri, "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](http://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-a2a4-3f9decd3ca4c.html](http://www.theadvocate.com/baton_rouge/article_dcf07b0c-399d-11eb-a2a4-3f9decd3ca4c.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/>.

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 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 is 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.restore.la.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.restore.la.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 Irtonon have looked down on us – not just Irtonon 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 calims/ 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? They 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. Even 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 the 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 season 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

**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 in the Ida Most Impacted/Distressed areas and is not part of this appropriation and Action Plan.**

*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.

**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 in the Ida Most Impacted/Distressed areas and is not part of this appropriation and Action Plan.**

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](https://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](http://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.

**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 in the Ida Most Impacted/Distressed areas and is not part of this appropriation and Action Plan. However, The RESTORE 20 Program will provide funds for elevation to eligible participating, homeowners. Please see the current guidelines (for Laura/Delta, anticipating it will be along the same lines for Ida) for available homeowner repair and reconstruction program at [Restore.LA.Gov](https://www.restore.la.gov)**

*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.

**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 in the Ida Most Impacted/Distressed areas and is not part of this appropriation and Action Plan. However, The RESTORE 20 Program will provide funds for elevation to eligible participating, homeowners. Please see the current guidelines (for Laura/Delta, anticipating it will be along the same lines for Ida) for available homeowner repair and reconstruction program at [Restore.LA.Gov](https://www.restore.la.gov).**

*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.

**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](http://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.**

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](http://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.<sup>1</sup>

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..."<sup>2</sup> 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."<sup>3</sup>

**(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.<sup>4</sup>*

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*

---

<sup>1</sup> 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/oa/ocd/policy-and-reports/apa/>

<sup>2</sup> *Id.*

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

<sup>4</sup> *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.<sup>5</sup>

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*.<sup>6</sup> HUD uses this FEMA-based standard for unmet needs in order to determine which *areas*, as a whole, should be classified as "most impacted."<sup>7</sup> 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."<sup>8</sup> 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."<sup>9</sup>

The Disaster Impact and Unmet Needs Assessment Kit<sup>10</sup> is guidance published by HUD for the purpose of helping CDBG-CR 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.<sup>11</sup>

This Assessment Kit specifically defines unmet needs as those "that are not covered by other sources and can be covered by CDBG-DR funds."<sup>12</sup> 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

---

<sup>5</sup> *Id.*

<sup>6</sup> 87 FR 6364, 6369

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 6371.

<sup>9</sup> *Id.* at 6365.

<sup>10</sup> 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/>

<sup>11</sup> CDBG-DR Policy Guide for Grantees, HUD Exchange, September 2019.

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

<sup>12</sup> Disaster Impact and Unmet Needs Assessment Kit at page 8.



“the grantee must keep in mind” while “defining the community’s unmet needs.”<sup>13</sup> 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.”<sup>14</sup>

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.

---

<sup>13</sup> *Id.*

<sup>14</sup> *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.<sup>15</sup>

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

---

<sup>15</sup> 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-households-disproportionately-denied-by-fema-is-a-sign-of-a-system-that-is-failing-the-most-vulnerable/#:~: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.”<sup>16</sup> 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.<sup>17</sup> 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.<sup>18</sup> 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.

<sup>16</sup> Disaster Impact and Unmet Needs Assessment Kit at page 8.

<sup>17</sup> FEMA, Individual Assistance Program and Policy Guide, May 2021, page 66.

<sup>18</sup> 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*.<sup>19</sup> 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.<sup>20</sup> In 2018, the average flood insurance premium along the Gulf Coast was \$5000.00.<sup>21</sup> 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.<sup>22</sup> 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.<sup>23</sup>

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

<sup>19</sup> Louisiana Office of Community Development, *Laura Delta Action Plan*, page 11.

<sup>20</sup> 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](https://www.disasterlegalaid.org/library/item.689188-Legal_Needs_After_a_Disaster).

<sup>21</sup> 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](https://riskcenter.wharton.upenn.edu/wp-content/uploads/2022/04/Improving-LMI-Household-Flood-Insurance-Options_Issue-Brief.pdf).

<sup>22</sup> 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/>

<sup>23</sup> 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.<sup>24</sup> 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.”<sup>25</sup>

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.<sup>26</sup> Moreover, Louisiana's licensing board cannot conduct investigations or prosecute unlicensed contractors.<sup>27</sup>

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

---

<sup>24</sup> *Id.* at 13.

<sup>25</sup> *Id.* at 108.

<sup>26</sup> 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>.

<sup>27</sup> *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.<sup>28</sup> 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.<sup>29</sup> According to this study, the two main obstacles to internet access are location and affordability.<sup>30</sup> 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.

<sup>28</sup> Louisiana Office of Community Development, *Laura Delta Action Plan*, page 93.

<sup>29</sup> 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/>.

<sup>30</sup> *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](http://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 7<sup>th</sup> a 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 =>

ret on May 17<sup>th</sup>. I did not have flood insurance, only renters 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](https://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](https://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](https://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 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](http://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](http://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](http://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](https://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](https://restore.la.gov). Also you are encouraged to reach out for further assistance to the Disaster Case Management program at [dcmpla.com](https://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](http://dcmpla.com).

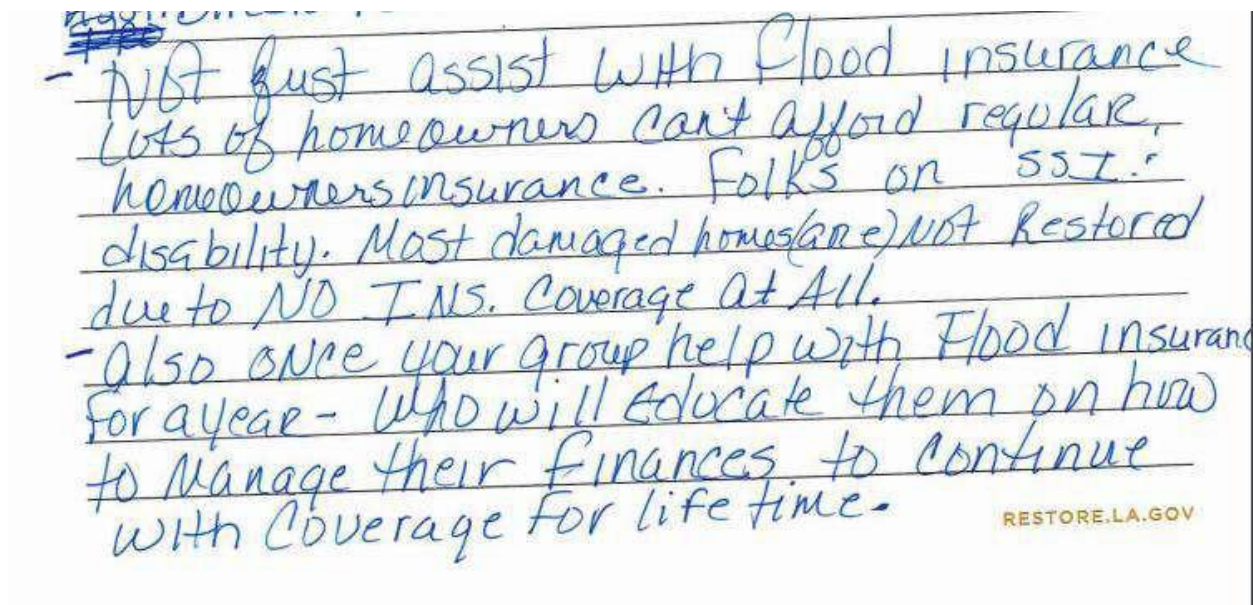
#### PUBLIC COMMENT

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:

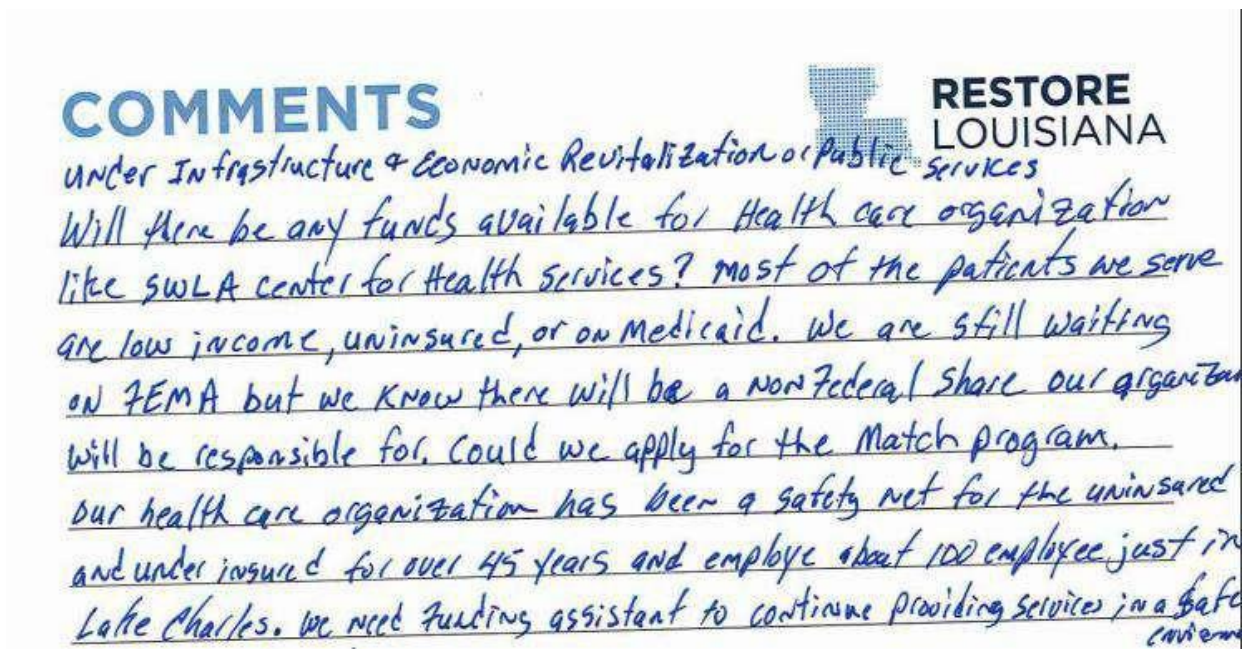
<https://lchrrp.com/>.

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





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.



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](http://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 if 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



RESTORE  
LOUISIANA

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](https://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](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](http://restore.la.gov).





## COMMENTS



RESTORE  
LOUISIANA

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 + Remodeled + 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 on the Board to Support the local Community? 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. 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



## RESTORE LOUISIANA

*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



RESTORE  
LOUISIANA

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 renters 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.



## 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 renters 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.