



LOUISIANA
Office of
**COMMUNITY
DEVELOPMENT**

U.S. Department of Housing and Urban Development

Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements

The Disaster Relief Supplemental Appropriations Act, 2022 (Public Law 117-43)

Federal Register Docket No. FR-6326-N-01

**State of Louisiana Substantial Action
Plan Amendment No. 1 for the Utilization
of Community Development Block Grant
Funds in Response to 2020 and 2021
Federal Declarations in Louisiana**

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HUD Approved: September 20, 2022

ABSTRACT

The state previously submitted the action plan for Hurricanes Laura and Delta to the U.S. Dept. of Housing and Urban Development (HUD) on May 6, 2022.

This document reads as a substantial action plan amendment (Amendment I) to the Louisiana Office of Community Development's (OCD) Master Action Plan for Hurricanes Laura and Delta (*DR 4559 & 4570*), submitted to HUD for funding allocated to the state through the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43).

The state submits Amendment I as a response to the \$450 million increase in allocated funding for Hurricanes Laura and Delta, as well as a new funding allocation of \$1.27 billion for Hurricane Ida (*DR 4611*) and Louisiana Severe Storms, Tornadoes, and Flooding (*DR 4606*) (May 2021 Floods), announced in March 2022. As such, this document proposes modifications to the Master Action Plan for Hurricanes Laura and Delta related to budget increases, additional programming, and an expanded list of HUD-identified Most Impacted and Distressed (MID) areas.

Amendment I also addresses the unmet needs analysis for Hurricane Ida and the May 2021 Floods along with the proposed programs and budgets for the allocated \$1.27 billion.

As Louisiana was recovering from the record-breaking hurricane season of 2020, as well as the catastrophic damages of COVID-19, 2021 brought severe winter storms in February; severe storms, tornadoes, and flooding in May; and Hurricane Ida in August, which proved to be the costliest storm of 2021 and one of the strongest to ever hit the state. All of these natural disasters resulted in major disaster declarations from FEMA, and all caused significant damage to Louisiana residents, businesses, and communities. These three events resulted in 49 out of 64 parishes across the state receiving a disaster declaration for FEMA IA and qualified for appropriation under Public Law 117-43.

In 2020, Louisiana was hit by five named storms, breaking the state record for the most strikes in a single season. Three of these events, Hurricane Laura in August, and Hurricanes Delta and Zeta in October, resulted in 30 parishes receiving a disaster declaration for Federal Emergency Management Agency (FEMA) Individual Assistance (IA). Twenty-four of the 30 parishes were devastated by both Hurricanes Laura and Delta, which struck Southwest Louisiana just six weeks apart. With storms then occurring in the winter, spring, and summer of 2021, the state's need for disaster recovery and mitigation measures was exacerbated, with Hurricane Ida striking the state as a



Category 4 hurricane, dumping large amounts of rain and bringing 150-mph winds along with extremely high tides.

Now, as Louisiana looks to recover and rebuild from two years of historical natural disasters, the need for identifying and creating affordable housing for the state’s vulnerable populations has never been greater as available options have been depleted. Further, 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.



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SECTION 1

1. EXECUTIVE SUMMARY

OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Louisiana will receive \$1,272,346,000 in funding to support long-term recovery efforts following *Hurricane Ida (DR 4611) and Louisiana Severe Storms, Tornadoes, and Flooding (DR 4606)* (May 2021 Floods) 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 \$1,272,346,000 in CDBG-DR funds to the *State of Louisiana* in response to *Hurricane Ida (DR 4611) and (DR 4606)*. Also, HUD allocated additional funds specifically \$10,776,000 to the *City of Lake Charles* and \$4,648,000 to the *City of Baton Rouge* in response to *Louisiana Severe Storms, Tornadoes, and Flooding (DR 4606)* through the publication of the Federal Register, *FR-6326-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

2021 STORMS

Louisiana was impacted by three major disasters in 2021 – Severe Winter Storms (DR 4590); May 2021 Floods (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.

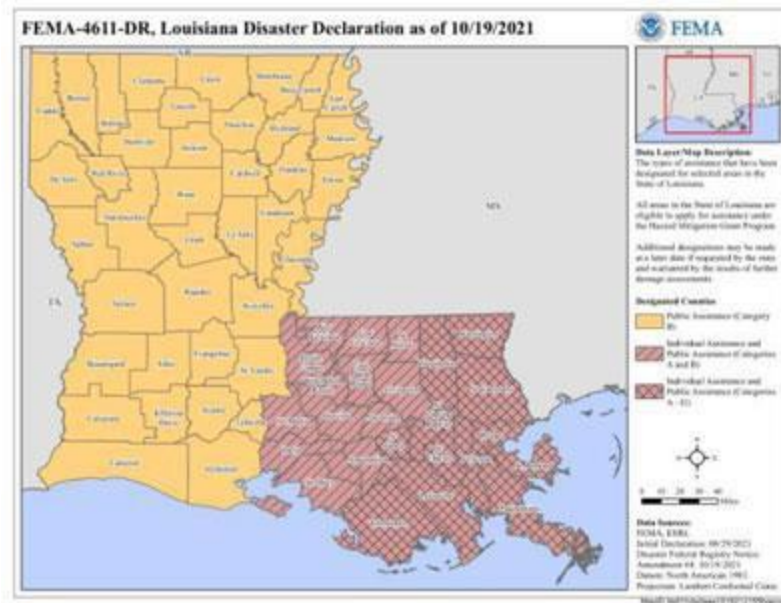
Hurricane Ida (DR-4611)

Hurricane Ida made landfall in Lafourche Parish on August 29, 2021, with sustained winds of 150 mph, just shy of a Category 5 storm. Hurricane Ida is tied with Hurricane Laura in 2020 as the strongest hurricane to strike Louisiana. Significant rainfall brought five to 10 inches of rain in areas throughout the state, with up to 17 inches recorded just outside of New Orleans, causing severe flash flooding that overcame levees and resulted in hundreds of high-water rescues. The wind gusts from the storm led to parish-wide power outages, uprooted trees, and debris that covered streets and barred transportation. Terrebonne and Lafourche parishes were particularly hard hit along with St. John, St. James, St. Charles, and large portions of lower Jefferson. According to the Louisiana Department of Health, Hurricane Ida resulted in a total of 29 storm-related deaths.



Source: 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, along with sustained high winds, storm surge, and heavy rainfall, 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.

Hurricane Ida's 150-mph winds crippled south Louisiana's power grid, forcing critical infrastructure like hospitals, water and wastewater systems to implement emergency measures to be able to continue critical disaster recovery functions. Hurricane Ida left residents with widespread flooding, significant power outages and debris-covered streets. After the storm, more than 1 million Louisiana customers were without electricity.

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.

REPETITIVE EVENTS

The number of affordable-housing units in the United States that are at risk of regular flooding is expected to triple by 2050 as sea levels rise.¹ The increases in sea levels exacerbates tropical storm intensity, rainfall rates, and creates an elevated storm surge risk. The National Oceanic and Atmospheric Administration’s 2022 Sea Level Rise Technical Report contains the updated projections for U.S. coastal waters and is a resource the state will consider when implementing mitigation efforts as Louisiana adapts to sea-level rise and its lasting effects.²

According to the FEMA Region 6 Mitigation, Floodplain Management and Insurance Branch, the state has 34,128 repetitive loss properties, of which 5,564 are severe repetitive loss. In the 25 parishes affected by Hurricane Ida, there were 28,916 repetitive loss properties and of those 4,622 were severe repetitive loss properties.

FEMA defines repetitive loss property as “any insurable building for which two or more claims of more than \$1,000 were paid by the National Flood Insurance Program (NFIP) within any rolling ten-year period, since 1978.”³ FEMA defines a *severe* repetitive loss property as “a single family property (consisting of 1 to 4 residences) that is covered under flood insurance by the NFIP and has incurred flood-related damage for which 4 or more separate claims payments have been paid under flood insurance coverage, with the amount of each claim payment exceeding \$5,000 and with cumulative amount of such claims payments exceeding \$20,000; or for which at least 2 separate claims payments have been made with the cumulative amount of such claims exceeding the reported value of the property.”⁴

The figure below depicts both the repetitive loss and severe repetitive loss properties with predicted land loss and gain in the next 20 years based on a medium environmental scenario from the Coastal Protection Restoration Agency of Louisiana.⁵ This map highlights vulnerable communities in three parishes (Orleans, Lafourche, and Terrebonne) that should consider future land loss when rebuilding. East Baton Rouge and Ascension Parishes are also highlighted to note the concentration of repetitive loss properties.

¹ [Outdated Federal Flood Standards Put People at Risk | NRDC](#)

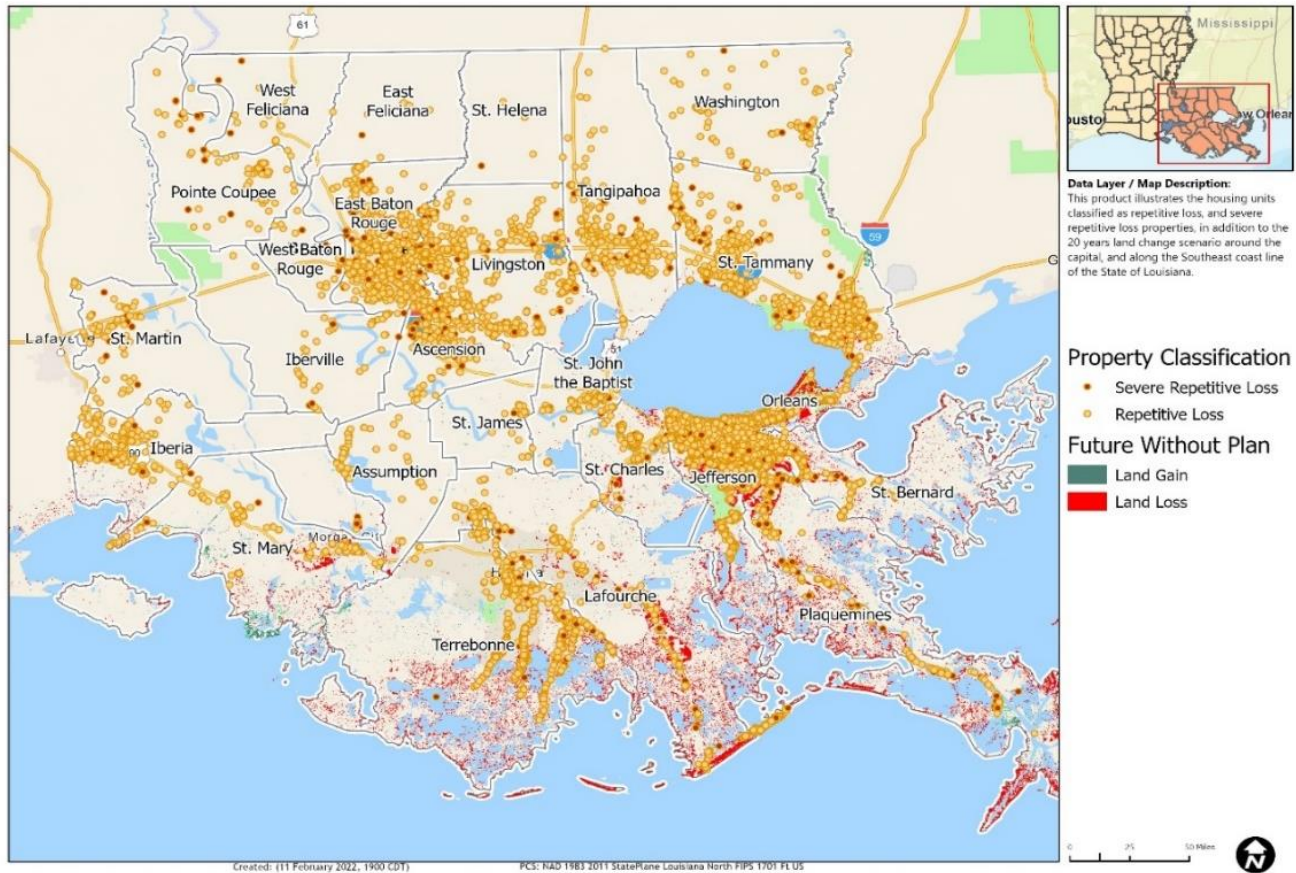
² [2022 Sea Level Rise Technical Report \(noaa.gov\)](#)

³ https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt

⁴ https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt

⁵ The maps were created from information from the U.S. Department of Housing & Urban Development, U.S. Department of Agriculture, Coastal Protection Restoration Agency of Louisiana, and ESRI.

FIGURE: MAP OF REPETITIVE LOSS PROPERTIES AND FUTURE LAND LOSS IN 20 YEARS



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. Of the 60 parishes that qualified for IA, 28 have been repeatedly impacted by weather events and received multiple declarations. Caldwell, East Carroll, Evangeline, and Tensas parishes are the four parishes that did not receive a federal disaster declaration in 2020 or 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 and 2021 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 22 HUD-declared MID areas from Hurricanes Ida.

As Louisiana has received Community Development Block Grant Disaster Recovery (CDBG-DR) funding allocation under PL 117-43 for 2020 Hurricanes Laura, Delta, and Ida and the May 2021 Floods, 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 Hurricane Ida.

Through this Action Plan, the state presents unmet need estimates from the 2020 storms and now 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 \$1,391,654,529 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, a Resilient Communities Infrastructure Program, a Small Business Loan and Grant Program, and a Hometown Revitalization 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.

The table below details the distribution of the **\$1,272,346,000** for Hurricane Ida and May 2021 Floods from the Disaster Relief Supplemental Appropriations Act 2022.



UNMET NEED AND PROPOSED ALLOCATIONS

CATEGORY	REMAINING UNMET NEED	% OF UNMET NEED	PROGRAM ALLOCATION AMOUNT	% OF PROGRAM ALLOCATION
Administration	49,106,160	1.4%	49,893,840	3.9%
Planning	0	0.0%	1,000,000	0.1%
Housing	550,279,191	16.1%	867,873,287	68.2%
Infrastructure	184,530,483	5.4%	232,883,641	18.3%
Economic Revitalization	2,624,304,768	77.0%	120,695,232	9.5%
Public Services	0	0.0%	0	0.0%
Total	3,408,220,601	100.0	1,272,346,000	100%

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.*

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 Hurricane Ida and the May 2021 Floods.

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 Hurricane Ida and the May 2021 Severe Storms: Ascension, Assumption, Calcasieu, East Baton Rouge, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Mary, St. Tammany, Tangipahoa, Terrebonne, and Washington Parishes; 70764 & 70788 (Iberville Parish) and 70767 (West Baton Rouge Parish).

Each of the specified areas had more than 1,000 housing units damaged in Hurricane 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 22 HUD-identified MID areas from Hurricane Ida and the May 2021 Floods, the state has identified the following parishes as MID: East Feliciana, Iberia, Iberville, Point Coupee, St. Martin, West Baton Rouge and West Feliciana.

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, Hurricane Ida, 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. Therefore, creating adequate housing for

special needs and senior populations, inclusive of supportive services, and planning for the increasing risks of populations living along the Gulf Coast area should be a focus of the recovery efforts.

Approximately 61 percent of the state's population is located within the 27 IA parishes affected by Hurricane Ida and May Floods of 2021.

Of this total:

- 93 percent of the population residing in the 27 IA parishes is located within one of the 22 areas identified by HUD as most impacted and distressed.
- It is important to note that the population residing within the 22 areas identified as most impacted and distressed comprises roughly 57 percent of the state's total population.

Demographic Information for Impacted Areas

Selected American Community Survey data for the IA parishes, as well as the entire state, are provided in the succeeding tables below. Several categories of information will be highlighted and discussed, to emphasize parishes which may have particularly high (or low) values. For example, parishes with median household income values well above (125%) or below (75%) of the state median (\$49,469) were identified.

The declared parishes have a combined population of 2,699,273⁶, comprising 58 percent of the total Louisiana population. There are eight IA parishes with population exceeding 100,000, including Ascension, East Baton Rouge, Jefferson, Livingston, Orleans, St. Tammany, Tangipahoa, and Terrebonne. Those eight parishes have a combined population of 2,057,648 (or 76.2% of the population of all the IA parishes). The two most populous parishes are East Baton Rouge with 456,781 residents and Jefferson with 440,781 residents, which are located within the Baton Rouge and New Orleans-Metairie metropolitan areas, respectively. East Baton Rouge and Jefferson parishes combined represent 33.3 percent of the population of the 25 IA parishes. In contrast, the eight smallest declared parishes (Assumption, East Feliciana, Plaquemines, Pointe Coupee, St. Helena, St. James, West Baton Rouge, and West Feliciana) each have a population under 28,000. With a combined population of 158,472, the eight smallest parishes account for only 5.9 percent of the population of the 25 IA parishes. The nine remaining IA parishes, ranging in population from 30,241 in Iberville Parish to 97,557 in Lafourche Parish, comprise 17.9 percent of the population of the IA parishes.

⁶ 2020 Decennial Census; all other data uses 2019 ACS 5-year data.

Although the smaller parishes may have a comparatively small portion of the state’s disaster survivors, consideration of the housing impacts and recovery in those parishes is critical for the economic resilience of those areas. To consider the comprehensive housing needs of those parishes will require looking beyond the total number of FEMA registrants or damage.

Age and Family Size

The portion of people in the 25 IA parishes for Hurricane Ida under 18 years of age ranges from 16.3 to 27 percent and is generally comparable to the entire state (where 23.7% of the population is under 18). Ascension Parish has the highest rate of population under 18 years of age at 27 percent and has an average family size of 3.4 household members. West Feliciana Parish has the largest average family size of the declared parishes at 4.1 household members, despite having the lowest percentage of people under 18 years of age (16.3%). For the 60+ age cohort, the range is more widespread at 16.4 to 28.3 percent, compared to Louisiana’s 21.3 percent statewide. Communities with high percentages of young and/or residents aged 60 and over may face increased recovery challenges because these segments of the population may require more resources to support their recovery.

Average household sizes are smaller than average family sizes, in large part because a family contains a minimum of two people, whereas only one person is needed to form a household. In Louisiana, the average household size is 2.6 (compared to the state’s average family size of 3.3 household members).

HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

LOCATION	POPULATION	AGE, PERCENT		FAMILY SIZE
		Under 18	60+	
Louisiana	4,657,757	23.70%	21.30%	3.3
Ascension	126,500	27.00%	17.00%	3.4
Assumption	21,039	22.00%	23.80%	3.4
East Baton Rouge	456,781	22.80%	19.50%	3.4
East Feliciana	19,539	18.20%	24.60%	2.7
Iberia	69,929	26.30%	21.30%	3.2
Iberville	30,241	21.10%	21.30%	3.4
Jefferson	440,781	22.10%	23.40%	3.2
Lafourche	97,557	23.40%	21.50%	3.1



HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

Livingston	142,282	25.90%	19.00%	3.4
Orleans	383,997	20.10%	20.70%	3.7
Plaquemines	23,515	26.10%	19.20%	3
Pointe Coupee	20,758	22.30%	28.30%	3.1
St. Bernard	43,764	26.80%	16.40%	3.8
St. Charles	52,549	24.60%	19.40%	3.1
St. Helena	10,920	21.30%	27.40%	3.2
St. James	20,192	22.90%	24.30%	3.3
St. John the Baptist	42,477	24.80%	20.30%	3.3
St. Martin	51,767	24.30%	21.20%	3.2
St. Mary	49,406	24.20%	22.80%	3.5
St. Tammany	264,570	24.10%	23.40%	3.3
Tangipahoa	133,157	24.60%	20.10%	3.3
Terrebonne	109,580	25.50%	19.90%	3.4
Washington	45,463	24.10%	24.80%	3.1
West Baton Rouge	27,199	23.90%	20.20%	3
West Feliciana	15,310	16.30%	20.20%	4.1

Source: American Community Survey 2019 5-year data

Income Levels

More than half of the 25 IA parishes have a median household income above the statewide figure of \$49,469. Of the declared parishes, Ascension Parish, located within the Baton Rouge metropolitan area, has the highest median income at \$80,527. Of the 25 IA parishes, none have household income below 75 percent of the statewide

median, and five have a household income above 125 percent of the statewide median (Ascension, Livingston, St. Charles, St. Tammany, and West Baton Rouge).⁷

The ability to address the financial demands of disaster recovery at the individual or family level is often a function of family income. Those costs may be borne by insurance, savings, loans, or external assistance. The median household income⁸ for Louisiana (all parishes) is \$49,469 (mean of \$71,001). The median household income in the 25 IA parishes ranges from \$37,570 to \$80,527 (the mean household incomes range from \$52,104 to \$94,664). Of the declared parishes, 7 have a median household income below \$45,000 (Assumption, Orleans, Pointe Coupee, St. Bernard, St. Helena, St. Mary, and Washington). Washington Parish has the lowest median household income at \$37,570. Only four parishes have a median household income above \$65,000 (Ascension, St. Charles, St. Tammany, and West Baton Rouge). Ascension Parish has the highest median household income amongst the IA parishes at \$80,527.

Several of these parishes have a greater portion of the population who derive a portion of their household income from Social Security and retirement sources. In Louisiana, 31.3 percent of households receive income from Social Security, averaging \$17,430⁹ statewide. In the 25 IA parishes, that ranges from 25 percent to 40.2 percent (Ascension Parish is at 25.0% and St. Helena is 40.2%). In 17 of the 25 IA parishes, the percentage of households who receive Social Security benefits exceeded the statewide average (Assumption, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Pointe Coupee, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, and West Feliciana). In Louisiana, 18.5 percent of households receive some form of retirement income outside of Social Security, averaging \$24,780. Among the IA parishes, 10 have more than 20 percent of households receiving retirement income (East Baton Rouge, East Feliciana, Iberville, Pointe Coupee, St. Charles, St. Helena, St. James, St. Tammany, West Baton Rouge, and West Feliciana). Residents in the impacted parishes who live on a fixed income derived primarily from either Social Security or retirement benefits may face additional recovery resource challenges.

Education

In Louisiana, 14.8 percent of residents lack a high school degree while 24.1 percent possess a bachelor's degree or higher. In the 25 IA parishes, 15 percent exceed the statewide average of the parish population without high

⁷ As shown in Table DP03 of the 2019 5-year ACS.

⁸ Median income may be a more effective statistic because it is less prone to being influenced by high incomes at the very top of the range.

⁹ As shown in Table DP03 of the 2019 5-year ACS

school degrees, represented in the table below. In the IA parishes, this ranges from 16.3 percent in Plaquemines Parish to a high of 25.6 percent in Assumption Parish. Baton Rouge Parish and Orleans Parish, which are located in the Baton Rouge and New Orleans-Metairie metropolitan areas, respectively, have larger proportions of college graduates (34.9% and 37.6%, respectively) while others in less populated areas (Lafourche and Terrebonne) do not (ranging from 15.6%-16.9%). The 21 remaining parishes have a proportion of residents with a bachelor's degree or higher ranging from 9.6 percent to 33.8 percent, with nearly half of those parishes averaging less than 15 percent for residents with a bachelor's degree or higher (Assumption, East Feliciana, Iberia, Iberville, Pointe Coupee, St. Bernard, St. Martin, St. Mary, and Washington parishes). Those without bachelor's degrees may experience limited options with respect to employment in their recovery from the disaster, particularly if businesses close or modernize as part of recovery efforts. Additionally, this may impact state or local economic development initiatives that require increased educational attainment for the workforce.

Disability

Individuals with disabilities face additional challenges with respect to disaster recovery. The ACS data presents disability information for three age groups, under 18, 18 to 64, and 65 and over. The Louisiana estimates for individuals with a disability in those age groups is 5.6 percent, 13.4 percent and 38.8 percent respectively. For the youngest group (under 18), Assumption, East Baton Rouge, Iberia, Iberville, Lafourche, Livingston, Pointe Coupee, St. Helena, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana parishes all have at least 6 percent of the population is disabled (Louisiana average is 5.6%). Among the working age group, the disability percentages equal or exceed the statewide average in Assumption, East Feliciana, Iberia, Iberville, Lafourche, Pointe Coupee, St. Bernard, St. Helena, St. Mary, Tangipahoa, Terrebonne, and Washington. For residents 65 and older, parishes exceeding the statewide average include Assumption, Iberville, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Helena, St. James, St. John the Baptist, St. Martin, Tangipahoa, Terrebonne, and Washington. Amongst the IA parishes, Pointe Coupee Parish has the highest percentage of the population aged 65 and over with a disability at 53.3 percent.

Planning for individuals with disabilities is essential in recovery efforts as this group often needs additional housing considerations, particularly individuals with mobility challenges. In areas prone to flooding, the challenge is to balance the need for elevation while avoiding denying housing choice to individuals unable to use stairs or long ramps. While mechanical lifts may be a solution for accessibility in elevated single-family housing, the long-term operation and maintenance of those devices must be considered, as individuals with disabilities may not have the financial resources to assume the maintenance responsibilities.

Race

Race may play a role in engaging and assisting disaster survivors as lines of communication and community priorities may differ among different races. According to the ACS,¹⁰ while 58.7 percent of the Louisiana population identifies as white, in the 25 IA parishes, that ranges from 30.7 percent to 87.7 percent. Orleans Parish, which is located in the New Orleans-Metairie metropolitan area, has the lowest at 30.7 percent, not unexpected as urban areas often have significant minority communities.

Black or African American populations represent 32 percent of Louisiana's population in the IA parishes. The population distribution is predominantly in Orleans Parish, with 58.9 percent of the parish's population; St. John the Baptist Parish, with 56.1 percent of the population; and St. Helena Parish, with 52.5 percent of the population. In the remaining IA parishes, the average Black or African American population is 29.75 percent.

The percentage of American Indian and Alaska Native in the IA parishes are the highest in Terrebonne and Lafourche parishes at 5.6 percent and 2.1 percent, respectively. Plaquemines, St. Helena, and St. Mary parishes all have approximately 1 to 1.5 percent of their respective populations comprised of American Indian and Alaska Natives. Statewide, American Indian and Alaska Natives represent less than 1 percent (0.5%) of the Louisiana population.

Limited English Proficiency

While the Hispanic or Latino populations in the IA parishes are generally lower than the Louisiana average (5.1%), six parishes exceed the statewide rate by more than 1 percent. The highest is Jefferson Parish, with 14.5 percent of the population identifying as Latino, followed by St. Bernard (10.1%), Plaquemines (7.3%), St. Mary (7.0%), St. Charles (6.1%), and St. John the Baptist (6.1%). Hispanic or Latino residents may face communication challenges throughout the disaster recovery process, as those parishes also have the greatest proportion of residents with Limited English Proficiency (LEP).¹¹

Engaging in the disaster recovery process is challenging for all survivors, particularly those with LEP. In Louisiana, 2.9 percent of the population is considered to have LEP, with four of the six parishes identified above with a large Hispanic or Latino population maintaining a higher percentage than the state average. The five parishes with the highest rates of LEP are Jefferson with 8.7 percent of the population; East Baton Rouge and Plaquemines with 3.7

¹⁰ Table DP05 of the 2019 5-year ACS

¹¹ Table DP02 of the 2019 5-year ACS

percent each, respectively; St. Mary with 3.5 percent; and St. Bernard with 3.4 percent. The ACS data further shows that these are largely Spanish speakers in East Baton Rouge, Jefferson, St. Bernard, and St. Mary parishes, and a relatively even split between speakers of other European languages and Asian or Pacific Islander languages in Plaquemines Parish.

**TABLE: DEMOGRAPHICS –
DECLARED PARISHES - INCOME, EDUCATION, RACE, DISABILITY, LEP**

LOCATION	HOUSEHOLD INCOME (2019)		EDUCATION		DISABILITY, ALL AGES	RACE					HISPANIC OR LATINO	LIMITED ENGLISH PROFICIENCY (LEP)
	MEDIAN	MEAN	NO HS GRAD	BACHELORS OR HIGHER		WHITE	BLACK OR AFRICAN AMERICAN	AMERICAN INDIAN AND ALASKA	OTHER			
Louisiana	\$49,469	\$71,001	14.80%	24.10%	15.30%	58.70%	32.00%	0.50%	3.70%	5.10%	2.90%	
Ascension	\$80,527	\$94,664	11.40%	26.40%	12.20%	68.40%	21.70%	0.10%	4.20%	5.60%	2.60%	
Assumption	\$43,759	\$63,643	25.60%	9.60%	22.50%	65.60%	29.90%	0.40%	1.10%	3.00%	2.30%	
East Baton Rouge	\$54,948	\$82,340	9.50%	34.90%	14.70%	44.60%	46.00%	0.10%	5.10%	4.20%	3.70%	
East Feliciana	\$51,803	\$68,891	20.00%	12.70%	15.20%	53.40%	43.30%	0.50%	1.20%	1.70%	0.80%	
Iberia	\$46,861	\$61,590	20.10%	13.60%	16.20%	58.80%	31.50%	0.10%	5.40%	4.20%	3.20%	
Iberville	\$50,161	\$66,504	20.40%	13.90%	19.80%	47.70%	48.10%	0.10%	1.50%	2.60%	0.50%	
Jefferson	\$54,032	\$74,367	14.30%	26.80%	14.30%	52.60%	26.40%	0.30%	6.10%	14.50%	8.70%	
Lafourche	\$55,506	\$73,249	21.80%	16.90%	17.20%	76.80%	13.60%	2.10%	3.10%	4.40%	2.50%	
Livingston	\$63,389	\$80,470	14.80%	19.70%	13.20%	87.70%	5.90%	0.20%	2.40%	3.70%	1.80%	
Orleans	\$41,604	\$71,938	13.50%	37.60%	14.20%	30.70%	58.90%	0.10%	4.80%	5.50%	2.90%	
Plaquemines	\$57,204	\$76,432	16.30%	19.10%	14.80%	63.90%	19.90%	1.10%	7.80%	7.30%	3.70%	
Pointe Coupee	\$41,480	\$66,680	20.20%	14.90%	26.70%	60.30%	35.80%	0.00%	1.30%	2.60%	1.10%	
St. Bernard	\$44,661	\$56,887	19.80%	11.60%	17.60%	62.30%	22.70%	0.20%	4.70%	10.10%	3.40%	
St. Charles	\$69,019	\$89,045	10.00%	25.30%	11.80%	65.10%	26.30%	0.40%	2.10%	6.10%	1.40%	
St. Helena	\$43,886	\$61,237	22.50%	16.70%	19.00%	44.10%	52.50%	1.10%	0.40%	1.80%	2.10%	
St. James	\$51,603	\$70,558	14.60%	16.30%	14.40%	48.20%	49.60%	0.00%	0.60%	1.70%	0.40%	
St. John the Baptist	\$57,429	\$70,802	13.90%	15.90%	12.90%	34.30%	56.10%	0.00%	3.40%	6.10%	2.20%	
St. Martin	\$48,656	\$65,800	18.10%	14.50%	14.90%	64.30%	29.10%	0.40%	3.20%	3.00%	3.30%	
St. Mary	\$40,485	\$54,359	17.20%	10.20%	17.50%	56.10%	30.30%	1.50%	5.10%	7.00%	3.50%	
St. Tammany	\$68,905	\$91,595	9.50%	33.80%	15.00%	78.60%	12.00%	0.50%	3.40%	5.60%	2.80%	
Tangipahoa	\$47,832	\$64,903	16.40%	20.00%	19.90%	63.20%	29.40%	0.30%	2.90%	4.30%	1.70%	
Terrebonne	\$48,747	\$69,122	21.00%	15.60%	16.60%	66.70%	18.90%	5.60%	3.70%	5.20%	2.50%	
Washington	\$37,570	\$52,104	20.50%	11.60%	21.70%	65.50%	30.10%	0.20%	1.80%	2.30%	2.70%	
West Baton Rouge	\$65,385	\$79,390	12.80%	22.00%	13.90%	55.90%	39.70%	0.10%	1.20%	3.10%	0.90%	
West Feliciana	\$59,637	\$85,586	17.90%	24.20%	11.50%	52.40%	44.40%	0.20%	1.80%	1.20%	1.30%	

**TABLE: DEMOGRAPHICS –
DECLARED PARISHES - INCOME, EDUCATION, RACE, DISABILITY, LEP**

Source: 2019 ACS 5-year data

Note: "Other Race" includes Asian, Native Hawaiian and other Pacific Islander, other, and two or more races.

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, 73 percent of the wind-impacted population is reported not to carry hazard insurance as shown in the table below (major/severe damage categories only).

	IDA & SPRING FLOOD	COUNT W/O HOI OR FLOOD INS	% W/O HOI OR FLOOD INS
Wind Damage Only	31,663	23,448	74%
Flood Damage	9,345	6,454	69%
Totals	41,008	29,902	73%

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 2021 storms: 183,686
- 82,474 homeowners
- 26,556 major-severe / 55,918 minor
- 58,041 LMI / 24,433 non-LMI
- 101,212 renters
- 13,239 major-severe / 87,973 minor
- 85,510 LMI / 15,702 non-LMI
- Orleans (26%) and Jefferson (25%) parishes comprise 50% of all housing unit damages.
- Number of homeowners with wind damage: 31,663 (74 percent without homeowner insurance)
- Number of homeowners with flood damage: 9,345 (69 percent without flood insurance)

STATEWIDE HOUSING DAMAGE AND LOSS ASSESSMENT

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 22 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 Ida are as of January 2022. 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 Hurricane Ida. 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 – IDA

CATEGORY	COUNT	FEMA RP FVL	SBA RP VL	MULTIPLIER
Severe	482	23,444,972	39,937,564	1.70
Major-High	1,128	21,228,171	73,525,205	3.46
Major-Low	2,158	20,994,423	121,445,134	5.78
Minor-High	3,242	15,334,294	149,579,804	9.75
Minor-Low	2,848	3,118,093	112,454,566	36.07
Totals	9,858	84,119,954	496,942,273	

FEMA/SBA MULTIPLIER – SPRING FLOOD

CATEGORY	COUNT	FEMA RP FVL	SBA RP VL	MULTIPLIER
Severe	-	-	-	1.00
Major-High	4	47,243	205,058	4.34
Major-Low	104	827,532	6,530,577	7.89
Minor-High	173	1,253,355	9,717,210	7.75
Minor-Low	66	54,015	2,687,938	49.76
Totals	347	2,182,145	19,140,783	8.80

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
Ascension	18,568	5,762	2,094	2,251	15,218,879	6,761
Assumption	3,577	1,878	965	1,010	5,875,865	6,089
Calcasieu	1,823	1,210	817	1,210	8,234,001	6,805
East Baton Rouge	36,746	14,058	2,763	3,111	17,661,607	5,677
East Feliciana	2,123	902	365	396	2,176,250	5,962
Iberia	3,730	3,240	228	228	1,373,020	6,022
Iberville	3,213	1,889	579	641	3,888,310	6,066
Jefferson	88,420	24,324	11,163	11,798	119,816,096	10,733



COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Lafourche	25,348	11,305	7,142	7,299	116,946,062	16,374
Livingston	24,291	7,242	3,190	3,423	25,141,469	7,881
Orleans	57,824	18,794	9,457	10,122	62,375,506	6,596
Plaquemines	5,245	2,299	1,576	1,667	12,915,842	8,195
Pointe Coupee	999	623	98	98	741,887	7,570
St Bernard	8,896	2,840	1,519	1,613	8,295,266	5,461
St Charles	14,441	4,627	2,393	2,475	35,895,986	15,000
St Helena	3,232	1,800	1,187	1,278	7,202,082	6,067
St James	5,297	2,565	1,395	1,424	16,217,748	11,626
St John the Baptist	12,882	6,722	3,722	3,810	73,756,928	19,816
St Martin	1,760	1,497	120	120	661,971	5,516
St Mary	3,360	2,151	629	633	4,247,955	6,754
St Tammany	46,301	10,915	3,995	4,384	30,284,299	7,581
Tangipahoa	29,198	12,137	6,658	6,935	55,849,249	8,388
Terrebonne	26,497	12,641	8,041	8,190	137,209,316	17,064
Washington	6,405	2,888	1,245	1,338	7,051,135	5,664
West Baton Rouge	1,652	964	136	136	942,911	6,933
West Feliciana	621	412	57	57	363,252	6,373
Total	432,449	155,685	71,540	75,647	770,342,893	10,183

Data Source(s): FEMA IA Data



FEMA IA TENANT APPLICANTS

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS (\$)	AVERAGE FEMA VERIFIED AMOUNT
Ascension	10,691	7,713	1,626	2,294	2,059,621	898
Assumption	2,170	1,798	392	474	606,918	1,548
Calcasieu	1,611	760	279	760	1,222,076	1,608
East Baton Rouge	56,375	34,471	5,800	9,972	8,478,585	1,280
East Feliciana	1,425	1,125	69	103	116,357	1,686
Iberia	5,686	5,258	51	52	190,600	3,737
Iberville	3,650	3,028	179	208	656,469	3,156
Jefferson	79,101	56,810	31,247	40,180	40,432,764	1,294
Lafourche	10,892	8,942	5,016	5,690	10,499,392	2,093
Livingston	11,179	7,091	1,597	2,387	1,886,567	1,181
Orleans	96,852	68,719	36,823	48,344	41,224,852	1,120
Plaquemines	2,781	1,875	887	1,227	1,267,012	1,428
Pointe Coupee	2,476	2,262	37	37	135,664	3,667
St Bernard	6,846	4,903	2,506	3,203	2,607,489	1,040
St Charles	5,678	4,761	3,081	3,477	6,087,655	1,976
St Helena	992	738	337	403	341,673	1,014
St James	2,128	1,812	937	1,026	1,946,750	2,078
St John the Baptist	6,556	5,853	3,629	3,796	11,548,346	3,182
St Martin	3,932	3,756	49	49	147,413	3,008
St Mary	4,375	3,469	144	152	625,674	4,345
St Tammany	24,535	15,129	4,996	7,577	532,523	1,067
Tangipahoa	17,873	13,022	6,407	7,695	9,219,584	1,439
Terrebonne	15,788	13,029	8,208	9,365	16,243,223	1,979



COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS (\$)	AVERAGE FEMA VERIFIED AMOUNT
Washington	4,483	3,133	673	850	1,161,327	1,726
West Baton Rouge	2,399	1,901	61	62	262,632	4,305
West Feliciana	632	574	11	11	36,426	3,311
Total	381,106	271,905	115,042	149,394	164,337,589	1,100

Data Source(s): FEMA IA Data

FEMA IA APPLICATIONS BY HOUSING TYPE

RESIDENCE TYPE	# OF APPLICANTS	% OWNER OCCUPIED	% TENANTS	% UNKNOWN	% TYPE
Apartment	139,865	.02%	17.07%	.02%	17.11%
Assisted Living Facility	2,202	0%	.04%	0%	.27%
Boat	567	.03%	.04%	0%	.07%
College Dorm	514	0%	.06%	0%	.06%
Condo	9,223	.68%	.45%	0%	1.13%
Correctional Facility	65	0%	0%	0%	.01%
House/Duplex	559,534	44.73%	23.63%	.09%	68.45%
Military Housing	494	0%	.06%	0%	.06%
Mobile Home	68,344	5.79%	2.55%	.02%	8.36%
Other	15,205	.76%	1.08%	.01%	1.86%
Townhouse	15,200	.49%	1.36%	0%	1.86%
Travel Trailer	6,173	.53%	.22%	0%	.76%
Unknown	12	0%	0%	0%	0%
Total	817,398				

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-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH SEVERE
Ascension	1,091	990	185	458	62
Assumption	440	380	51	198	16
East Baton Rouge	1,756	1,366	188	652	32
East Feliciana	103	40	4	16	2
Iberia	127	86	22	39	1
Iberville	181	264	32	132	6
Jefferson	5,854	5,747	1,593	3,079	637
Lafourche	806	1,094	794	1,047	412
Livingston	1,650	1,210	293	712	96
Orleans	4,953	4,954	834	2,017	184
Plaquemines	676	483	131	258	78
Pointe Coupee	49	56	8	13	3
St Bernard	782	664	103	293	37
St Charles	783	1,181	481	955	219
St Helena	567	395	69	183	25
St James	442	617	247	544	82
St John the Baptist	745	1,276	1,026	1,417	350
St Martin	79	48	6	29	1
St Mary	275	250	57	126	16
St Tammany	2,726	1,678	395	906	147
Tangipahoa	2,936	2,525	658	1,515	206
Terrebonne	570	867	469	739	285
Washington	633	525	81	235	17
West Baton Rouge	68	71	11	29	3
West Feliciana	22	25	5	11	0



COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH SEVERE
Calcasieu	219	493	28	263	2
Total	28,633	27,285	7,771	15,866	2,919

Data Source(s): FEMA IA Data126

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
Ascension	1,247	264	111	54	5
Assumption	309	77	35	23	3
East Baton Rouge	6,009	965	487	238	26
East Feliciana	111	1	2	2	0
Iberia	155	29	7	3	0
Iberville	293	104	133	16	4
Jefferson	20,251	3,826	1,905	1,259	200
Lafourche	1,204	352	233	185	15
Livingston	1,298	214	126	39	4
Orleans	25,177	4,572	2,263	1,136	99
Plaquemines	514	123	58	42	8
Pointe Coupee	99	14	17	2	0
St Bernard	1,631	309	157	67	6
St Charles	1,843	499	254	256	34
St Helena	271	27	18	7	0
St James	632	153	90	88	9
St John the Baptist	1,715	731	569	508	171
St Martin	83	25	9	6	0
St. Mary	310	55	33	25	9



COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
St Tammany	3,287	553	351	169	20
Tangipahoa	4,337	1,017	668	328	24
Terrebonne	1,327	377	192	219	31
Washington	851	167	59	24	1
West Baton Rouge	132	18	15	12	1
West Feliciana	22	6	5	1	0
Calcasieu	231	156	4	54	5
Total	73,339	14,634	7,801	4,763	675

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.

The catastrophic winds, torrential rain and flooding of the May 2021 Floods and Hurricane Ida directly impacted several public housing developments in 22 of the most impacted parishes. The largest physical damages are reported at the Houma Public Housing Authority (PHA) (LA090), LaFourche PHA (LA080), Westwego PHA (LA011), Kenner PHA (LA012), and St. Charles PHA (LA094). As of March 3, 2022, damages are estimated at over \$44,925,000 for approximately 1,595 public housing units.

Of the PHAs in the FEMA Presidential Disaster Declaration (PDD) designated localities, 18 of the 50 reported displacements totaling 1,147 PIH assisted families ultimately displaced due to Hurricane Ida. Specifically, 581 public housing assisted households and 566 HCV households were reported displaced at the peak of storm impacts. As of March 2, 2022, 718, approximately 62.6 percent, of the original 1,147 displaced Public and Indian Housing (PIH) families have been rehoused. Of the remaining displacements, it is reported that 355 HCV families and 74 public housing families have been displaced. Accordingly, since rehousing efforts started, approximately 86.9 percent of displaced public housing families and 38.9 percent of displaced HCV families have been rehoused.

Since the hurricane made landfall, six of 18 impacted PHAs with displacements have successfully rehoused all displaced households within their portfolio. All other PHAs are making significant progress as well, with 62.6 percent of families rehoused. PIH continues to closely work with the impacted PHAs to establish permanent rehousing for all displaced families.



2. Public Housing and Affordable Housing

MULTIFAMILY HUD-ASSISTED HOUSING

TYPE OF DAMAGE	# OF PROPERTIES	# OF UNITS	# OF UNITS ASSISTED	# OF UNITS WAITING ASSISTANCE
Minor-Low	0.00	0.00	0.00	0.00
Minor-High	71	9,567	3,318	6,249
Major-Low	15	1,458	633	825
Major-High	0	0	0	0
Severe	23	3,246	1,312	1,934
Total	109	14,271	5,263	9,008

Data Source(s): DR-4611-LA Housing Impact Assessment March 17, 2022

* 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.

PUBLIC HOUSING AUTHORITIES DAMAGED

COUNTY	TOTAL # PHAS	TOTAL PHAS DAMAGED	# OF UNITS DAMAGED
All FEMA IA	50	18	1,147
Total	50	18	1,147

Data Source(s): DR-4611-LA Housing Impact Assessment March 17, 2022

OWNER WITH UNMET NEED IN A FLOODPLAIN

INCOME CATEGORY	COUNT	# WITHOUT FLOOD INSURANCE	% WITHOUT FLOOD INSURANCE
LMI	39,192	34,189	87%
Non-LMI	8,593	5,597	65%
Unknown	4,015	3,316	83%
Total	51,800	43,102	83%



INSURANCE CLAIMS AND LOSSES IN DISASTER IMPACTED AREAS

COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES (\$)
Ascension	17,007	10,754	170,763,421
Assumption	1,744	1,212	13,376,089
Calcasieu	179	77	2,097,735
East Baton Rouge	19,287	10,018	130,276,068
East Feliciana	535	320	3,024,904
Iberia	166	93	1,975,030
Iberville	838	488	5,202,788
Jefferson	98,912	58,670	1,265,648,773
Lafourche	30,548	20,283	744,260,524
Livingston	14,776	9,799	180,494,581
Orleans	70,443	37,548	789,303,733
Plaquemines	3,792	2,260	53,511,757
Pointe Coupee	151	82	1,354,399
St. Bernard	5,395	2,985	36,787,013
St. Charles	20,619	12,612	515,539,692
St. Helena	743	493	8,064,977
St. James	8,170	5,740	144,512,244
St. John the Baptist	20,510	13,582	468,102,338
St. Martin	58	34	250,213
St. Mary	566	317	3,088,977
St. Tammany	39,571	20,889	334,010,834
Tangipahoa	25,661	16,206	342,003,534
Terrebonne	43,582	28,911	1,054,971,582
Washington	2,480	1,423	19,527,711
West Baton Rouge	408	231	1,942,241
West Feliciana	141	74	567,734
Unknown	6,303	2,931	153,901,310



COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES (\$)
Total	432,585	258,032	6,444,560,202

Data Source(s): Louisiana Department of Insurance

TOTAL HOME LOANS APPROVED BY SBA

COUNTY	# OF HOME LOANS
Ascension	522
Assumption	64
East Baton Rouge	523
East Feliciana	8
Iberia	1
Iberville	23
Jefferson	6,169
Lafourche	2,060
Livingston	517
Orleans	3,933
Plaquemines	284
Pointe Coupee	6
St Bernard	449
St Charles	1,905
St Helena	43
St James	372
St John the Baptist	1,366
St Mary	17
St Tammany	1,942
Tangipahoa	1,221
Terrebonne	2,730



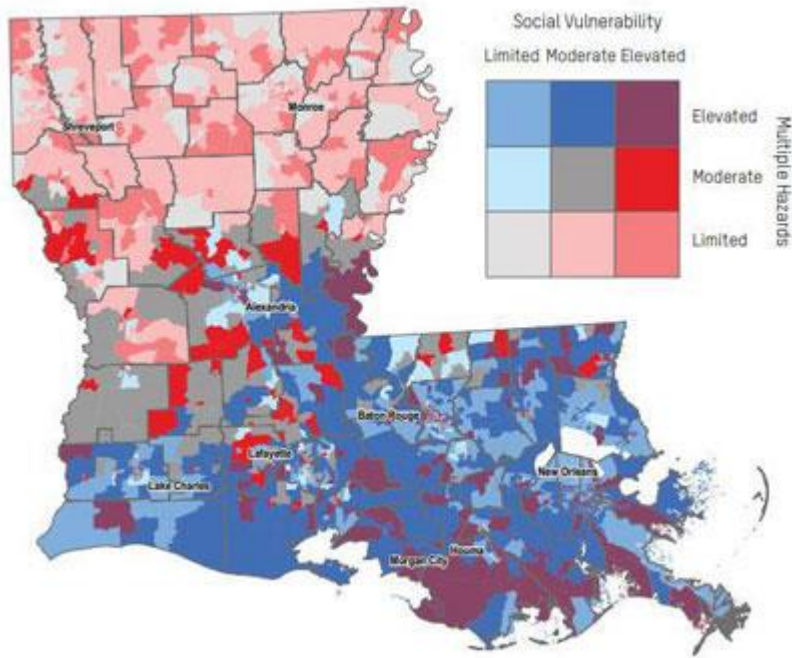
COUNTY	# OF HOME LOANS
Washington	95
West Baton Rouge	22
West Feliciana	1
Total	24,273

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.¹² 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.

¹² 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



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 homes. The table below provides a parish-level overview for each of the identified vulnerable populations located within all disaster-impacted 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
Ascension *	30%	11%	12%	10%	19%	Low
Assumption *	25%	17%	23%	19%	32%	High
Calcasieu *	27%	15%	15%	19%	16%	Low



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
East Baton Rouge *	26%	14%	15%	18%	3%	Low
East Feliciana	21%	17%	15%	19%	31%	Moderate to High
Iberia	29%	15%	16%	22%	21%	High
Iberville *	23%	15%	20%	19%	20%	Moderate to High
Jefferson *	24%	17%	14%	15%	2%	Low
Lafourche *	26%	15%	17%	18%	16%	Low
Livingston *	28%	13%	13%	12%	24%	Low
Orleans *	23%	14%	14%	24%	1%	High
Plaquemines *	29%	13%	15%	15%	27%	High
Pointe Coupee	24%	20%	27%	20%	24%	Moderate to 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. 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
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

* HUD MID parishes

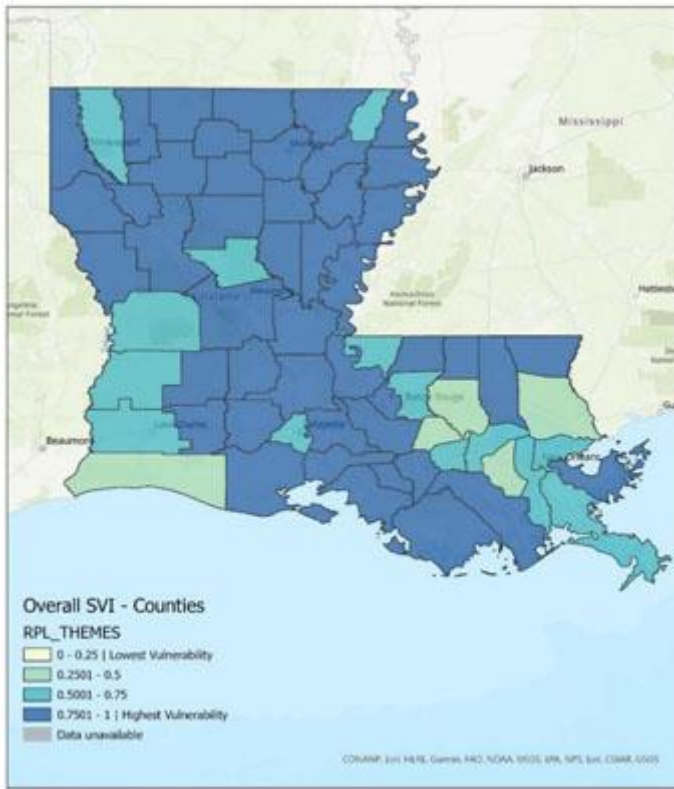
Source: US Census Bureau, American Community Survey and Small Area Income and Poverty Estimates (SAIPE) tool.

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%
Total	100%

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).

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 environmental review process provides a mechanism to identify environmental conditions impacting the use of property for consideration of means to mitigate adverse impacts or provide alternate assistance in the recovery process.¹³

STATEWIDE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

DEMOGRAPHIC	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Total Population	4,664,362	100%	2,434,578	52%	182,434	4%
Under 5 years	307,435	7%	158,457	52%	11,781	4%
65 years and over	698,018	15%	348,366	50%	28,228	4%
Population with a Disability	695,791	15%	368,208	53%	29,165	4%
White or Caucasian	2,735,887	59%	1,410,208	52%	108,498	4%
Black or African American	1,492,386	32%	805,509	54%	61,399	4%
American Indian and Alaska Native	23,892	1%	13,603	57%	410	2%
Asian	80,014	17%	42,990	54%	2,719	3%

¹³ 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



DEMOGRAPHIC	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Native Hawaiian and Other Pacific Islander	1,088	1%	445	41%	0	0%
Other	82,139	2%	45,105	55%	3,434	4%

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	100%	1,947,158	62%	123,894	4%
Less than high school graduate	461,706	15%	275,750	60%	23,907	5%
High School graduate or equivalency	1,061,388	34%	628,428	59%	51,813	5%
Some college, associate degree	848,474	27%	533,168	63%	29,713	4%
Bachelor's degree or higher	753,585	24%	509,812	68%	18,461	2%

Data Source(s): 2019 ACS 5 year

INCOME DEMOGRAPHICS

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	COUNTIES IMPACTED BY DISASTER	MIDS
Median Household Income	\$49,469.00	\$42,950.00	\$46,857.00
Per Capita Income	\$27,923	\$27,315	\$25,404
Total			

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



INCOME DEMOGRAPHICS — LOW INCOME

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	COUNTIES IMPACTED BY DISASTER	MIDS
Income in the past 12 months below poverty level	\$0.00	\$0.00	\$0.00
Total			

Data Source(s): OCD

LMI ANALYSIS - STATEWIDE

CATEGORY	TOTAL LMI PERSONS	TOTAL POPULATION	PERCENT LMI
Statewide	1,679,170.00	4,664,362.00	39%
Total	1,679,170.00	4,664,362.00	39%

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
Ascension	7	11	64%	744	864	86%
Assumption	0	0	0%	294	326	90%
East Baton Rouge	271	382	71%	1189	1,257	95%
East Feliciana	26	26	100%	0	0	0%
Iberia	67	72	93%	0	0	0%
Iberville	54	70	77%	151	162	93%
Jefferson	0	0	0%	6,182	8,673	71%
Lafourche	0	0	0%	1,711	2,686	64%
Livingston	0	0	0%	1,111	1,270	87%
Orleans	0	0	0%	5,921	6,533	91%
Plaquemines	0	0	0%	505	575	88%
Pointe Coupee	43	43	100%	0	0	0%



COUNTY	NON-MID-TOTAL LMI PERSONS	NON-MID-TOTAL POPULATION	NON-MID-PERCENTAGE LMI	MID-TOTAL LMI PERSONS	MID-TOTAL POPULATION	MID-PERCENTAGE LMI
St Bernard	0	0	0%	597	663	90%
St Charles	0	0	0%	1,460	2,199	66%
St Helena	0	0	0%	282	302	93%
St James	0	0	0%	875	1,060	83%
St John the Baptist	0	0	0%	2,790	4,041	69%
St Martin	48	51	94%	0	0	0%
St Mary	0	0	0%	252	266	95%
St Tammany	0	0	0%	1,639	1,988	82%
Tangipahoa	0	0	0%	2,925	3,399	86%
Terrebonne	0	0	0%	1,302	1,935	67%
Washington	0	0	0%	358	417	86%
West Baton Rouge	0	0	0%	70	71	99%
West Feliciana	22	22	100%	0	0	0%
Calcasieu	0	0	0%	285	431	66%
Total	538	677		30,643	39,118	

Data Source(s): FEMA IA Data

MOBILE HOUSING UNITS IMPACTED BY DISASTER

COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Ascension	1,701	6%
Assumption	839	3%
Calcasieu	45	0%
East Baton Rouge	493	2%
East Feliciana	126	0%
Iberia	230	1%
Iberville	456	2%



COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Jefferson	1,128	4%
Lafourche	1,791	7%
Livingston	2,970	11%
Orleans	129	0%
Plaquemines	1,389	5%
Pointe Coupee	116	0%
St Bernard	427	2%
St Charles	1,310	5%
St Helena	1,102	4%
St James	978	4%
St John the Baptist	1,241	5%
St Martin	164	1%
St Mary	602	2%
St Tammany	1,698	6%
Tangipahoa	5,390	20%
Terrebonne	1,215	5%
Washington	893	3%
West Baton Rouge	132	0%
West Feliciana	68	0%
Total	26,633	

Data Source(s): FEMA IA Data--This includes all damage categories.

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	351,468	726,383	297,960	615,797
Total	351,468	726,383	297,960	615,797

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



LIMITED ENGLISH PROFICIENCY BREAKDOWN

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Acadia	1,499	1%
Allen	653	1%
Ascension	1,843	1%
Assumption	515	0%
Avoyelles	1,099	1%
Beauregard	393	0%
Bienville	63	0%
Bossier	2,746	2%
Caddo	3,262	3%
Calcasieu	3,455	3%
Caldwell	115	0%
Cameron	97	0%
Catahoula	44	0%
Claiborne	34	0%
Concordia	79	0%
De Soto	310	0%
East Baton Rouge	12,168	10%
East Carroll	25	0%
East Feliciana	18	0%
Evangeline	1,471	1%
Franklin	56	0%
Grant	700	1%
Iberia	2,438	2%
Iberville	226	0%
Jackson	142	0%
Jefferson	33,538	27%
Jefferson Davis	460	0%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Lafayette	7,381	6%
Lafourche	3,832	3%
La Salle	254	0%
Lincoln	1,147	1%
Livingston	1,257	1%
Madison	67	0%
Morehouse	140	0%
Natchitoches	275	0%
Orleans	12,754	10%
Ouachita	941	1%
Plaquemines	683	1%
Pointe Coupee	299	0%
Rapides	2,428	2%
Red River	52	0%
Richland	22	0%
Sabine	198	0%
St. Bernard	1,748	1%
St. Charles	1,029	1%
St. Helena	94	0%
St. James	175	0%
St. John the Baptist	945	1%
St. Landry	2,419	2%
St. Martin	2,245	2%
St. Mary	1,835	1%
St. Tammany	5,217	4%
Tangipahoa	1,725	1%
Tensas	29	0%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Terrebonne	2,870	2%
Union	254	0%
Vermilion	2,348	2%
Vernon	981	1%
Washington	1,011	1%
Webster	252	0%
West Baton Rouge	301	0%
West Carroll	84	0%
West Feliciana	64	0%
Winn	15	0%
Total	124,820	97%

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

LANGUAGES SPOKEN WITHIN STATE

LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Chinese	5	0%	Allen
Chinese	296	0%	Caddo
Chinese	286	0%	Calcasieu
Chinese	742	0%	Lafayette
Chinese	11	0%	Natchitoches
Chinese	214	0%	Ouachita
Chinese	448	0%	Rapides
Chinese	83	0%	Vermilion
Chinese	99	0%	Vernon
French (incl. Patois, Cajun)	6,022	10%	Acadia
French (incl. Patois, Cajun)	936	4%	Allen
French (incl. Patois, Cajun)	202	1%	Beauregard



LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
French (incl. Patois, Cajun)	1,406	1%	Caddo
French (incl. Patois, Cajun)	5,411	3%	Calcasieu
French (incl. Patois, Cajun)	390	6%	Cameron
French (incl. Patois, Cajun)	2,162	7%	Jefferson Davis
French (incl. Patois, Cajun)	15,081	7%	Lafayette
French (incl. Patois, Cajun)	147	0%	Natchitoches
French (incl. Patois, Cajun)	302	0%	Ouachita
French (incl. Patois, Cajun)	1,391	1%	Rapides
French (incl. Patois, Cajun)	5,875	8%	St. Landry
French (incl. Patois, Cajun)	8,026	15%	Vermilion
French (incl. Patois, Cajun)	237	0%	Vernon
Spanish or Spanish Creole	844	1%	Acadia
Spanish or Spanish Creole	913	4%	Allen
Spanish or Spanish Creole	681	2%	Beauregard
Spanish or Spanish Creole	3,979	2%	Caddo
Spanish or Spanish Creole	4,143	2%	Calcasieu
Spanish or Spanish Creole	156	2%	Cameron
Spanish or Spanish Creole	377	1%	Jefferson Davis
Spanish or Spanish Creole	7,944	4%	Lafayette
Spanish or Spanish Creole	336	1%	Natchitoches
Spanish or Spanish Creole	1,909	1%	Ouachita
Spanish or Spanish Creole	2,931	2%	Rapides
Spanish or Spanish Creole	801	1%	St. Landry
Spanish or Spanish Creole	1,116	2%	Vermilion
Spanish or Spanish Creole	2,112	4%	Vernon
Speak only English	50,213	87%	Acadia
Speak only English	21,694	90%	Allen



LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Speak only English	32,431	96%	Beauregard
Speak only English	227,383	96%	Caddo
Speak only English	169,267	93%	Calcasieu
Speak only English	5,776	91%	Cameron
Speak only English	26,616	91%	Jefferson Davis
Speak only English	186,591	87%	Lafayette
Speak only English	35,968	98%	Natchitoches
Speak only English	141,088	97%	Ouachita
Speak only English	116,072	94%	Rapides
Speak only English	69,759	90%	St. Landry
Speak only English	44,338	81%	Vermilion
Speak only English	43,750	92%	Vernon
Vietnamese	45	0%	Allen
Vietnamese	25	0%	Beauregard
Vietnamese	701	0%	Caddo
Vietnamese	647	0%	Calcasieu
Vietnamese	32	0%	Jefferson Davis
Vietnamese	1,274	1%	Lafayette
Vietnamese	221	0%	Ouachita
Vietnamese	380	0%	Rapides
Vietnamese	112	0%	St. Landry
Vietnamese	1,053	1%	Vermilion
Vietnamese	82	0%	Vernon
All other Languages	16,443	1%	n/a
Total	1,269,975	1,378%	

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	339
LA-502	Shreveport, Bossier/Northwest Louisiana CoC	Caddo, Bossier	192
LA-503	New Orleans/Jefferson Parish CoC	Jefferson and Orleans Parishes	1,027
LA-505	Monroe/Northeast Louisiana CoC	Jackson, Lincoln, Morehouse, Ouachita & Union Parishes	78
LA-506	Slidell/Southeast Louisiana CoC	Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes	70
LA-507	Alexandria/Central Louisiana CoC	Grant, La Salle, Rapides, Vernon & Winn Parishes	64
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	330
Total			2,100

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	1,224	358	518	2,100
FEMA Declared	996	288	482	1,766
MIDs	675	270	482	1,427



SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
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Total

Data Source(s): HUD Exchange

POINT-IN-TIME COUNT - IMPACTED BY DISASTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
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Statewide	1224	389	unknown	2061
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FEMA Declared	1224	234	448	1906
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MIDs	1219	234	448	1901
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Data Source(s): HUD Exchange

HUD 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
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Ascension	0	0	0	1	0	0
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East Baton Rouge	0	0	0	18	0	0
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Jefferson	0	83	0	374	0	39
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Lafourche	0	15	0	250	0	5
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Livingston	0	0	0	1	0	0
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Orleans	0	55	0	1,773	0	0
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Plaquemines	0	5	0	0	0	0
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St Bernard	0	0	0	3	0	0
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St Charles	0	88	0	60	0	14
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St James	0	0	0	44	0	0
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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
St John the Baptist	0	20	0	32	0	23
St Mary	0	0	0	1	0	0
St Tammany	0	0	0	41	0	2
Tangipahoa	0	23	0	524	0	0
Terrebonne	0	43	0	239	0	468
Washington	0	0	0	1	0	0
Total	0	332	0	3,362	0	551

Data Source(s): Louisiana Housing Corporation

B. INFRASTRUCTURE UNMET NEED

Disaster Damage and Impacts

STATEWIDE INFRASTRUCTURE DAMAGE & LOSS ASSESSMENT

Since 2000, Louisiana has experienced 33 major disaster declarations, most commonly caused by hurricane and flood events. Even before the hurricanes of 2020 and 2021, Louisiana’s recovery from extensive infrastructure damage from previous disasters was challenging. Unfortunately, extreme weather patterns are becoming more severe due to climate change.

With natural disasters affecting the state’s coastal and inland communities with such frequency, the need to provide communities with stable and resilient infrastructure is paramount in recovery efforts. Hurricane Ida heightened the demand for more mitigation initiatives and more enhanced building construction to help local communities better prepare for and recover from damaging storms.

Louisiana’s development patterns rely on surface transportation, which is subject to flooding during severe weather events. This not only leaves residents stranded and in danger of rising water but also taxes emergency responders’ ability to provide critical safety and security services. Many critical facilities also face significant flood risk inhibiting emergency management procedures and disrupting service continuity after a disaster.

Thus, the need for significant infrastructure improvements through the state's recovery efforts is clearly evidenced by current conditions and past disasters. Louisiana's most recent American Society of Civil Engineers' Report Card indicated a D+ grade for conditions across 11 key infrastructure sectors, suggesting that if improvements are not made to the system, damages from further disasters will be exacerbated for residents, businesses, and communities.

Hurricane Ida, which caused property damage estimated at \$65 billion, was the most expensive natural disaster of 2021. This storm revealed significant vulnerabilities in the state's infrastructure system and electric grid by exposing aging transmission lines and connectivity bottlenecks. The entire power grid collapsed around a 10-parish radius, with residents and businesses waiting weeks for full restoration.

In New Orleans, all eight transmission lines that bring electricity into the city were out of service on Aug. 29, the day Ida made landfall, leading to weeks of power outages. Tower lines collapsed into the Mississippi River, which limited vessel traffic on the river, causing severe congestion and delays. In addition to the damages sustained by utilities systems and the power grid, vegetation and debris deposits in waterways caused drainage problems in the affected areas, especially those areas with pre-existing flooding concerns. Debris accumulation restricted travel on roadways, further hampering rescue operations and delaying recovery efforts.

In Chalmette, a New Orleans Regional Transit Authority ferry broke loose from its mooring. In Bridge City, an Entergy transmission tower collapsed into the Mississippi River. A roadway bridge that connects the cities of Lafitte and Jean Lafitte was damaged after a barge crashed into it as rising tides caused dozens more roads to be submerged underwater. At least four hospitals were damaged, while 39 additional medical facilities were forced to rely on generator power to provide care.

The infrastructure and facility damage from Ida has created recovery voids in several localities, where funding to rebuild medical facilities, schools and community centers is not yet available. When Ida is combined with Hurricanes Laura, Delta and Zeta in 2020, the total infrastructure damage amounts to more than \$2 billion.

FEMA PUBLIC ASSISTANCE

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



HUD uses Louisiana’s non-federal cost-share match requirement for FEMA PA projects in categories C – G (traditionally 25%) as a proxy to determine infrastructure unmet need, since FEMA funds the majority of public infrastructure repairs. However, long-term recovery needs exist beyond the immediate threat to life and direct repair of facilities funded by FEMA PA. These lasting recovery problems can only be addressed with the long-term planning and implementation of projects designed to address these long-term problems.

In assessing unmet need, it is important to consider the additional strain local entities and organizations face when they must reallocate their already limited resources to address immediate recovery needs, as well as the additional costs of safeguarding their infrastructure assets from future disasters.

After a disaster strikes, local parishes and municipalities often have limited capacity and resources for forward-looking investment in the restoration of critical infrastructure. This restoration requires improvements in energy efficiency, modernized IT infrastructure in public facilities, and enhanced mitigation measures to prevent damage from future disasters. These local parishes and municipalities also need support for water management projects, hardening of transportation corridors and other flood-prevention improvements that enhance long-term resilience of local communities.

The program’s narrative describes how preparedness and mitigation measures will be integrated into rebuilding activities for all programs. Additionally, the state will support HUD’s mission to build more resilient communities by employing more forward-thinking decisions in land use, community mitigation measures and disaster-resistant buildings. These measures are built within the program structure and the state will monitor these efforts. This aligns with unmet needs associated with other planned state, local and regional projects.

For DR-4611 (Hurricane Ida), the state’s obligation has been established as 10% of eligible project costs. For DR-4606 (Storms, Tornados and Floods of May 2021), the state’s obligation has been established as 10% of eligible project costs.

As of Oct. 10, 2021, \$2.8 billion has been identified in PA need for these two storms. Based on this data, the current unmet need, or PA non-federal cost share, is estimated at \$251 million (\$1 million for May 2021 events and \$250 million for Hurricane Ida). The state will allocate funds to address a portion of this unmet need. The state recognizes the unmet need will steadily increase as project worksheets (PWs) are still being written and cost estimates for eligible permanent work is still being determined. The current unmet need identified in this Action Plan represents the state’s most up-to-date data.



HAZARD MITIGATION GRANT PROGRAM

The Hazard Mitigation Grant Program (HMGP) will be a critical part of the long-term recovery process in both rebuilding resilient housing stock and vital infrastructure. HMGP is generally calculated at 15% 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% and then 7.5% on a sliding scale.

As of Nov. 8, 2021, the state’s required local match obligation for DR-4611 (Hurricane Ida) and DR-4606 (Storms, Tornadoes and Floods of May 2021) has been established as not less than 25% of eligible project costs. Therefore, the state’s unmet need, or HGMP non-federal cost share, is estimated at \$126 million, 15% of IA funds and PA funds.

The Louisiana Watershed Initiative (LWI) represents a state framework to continue planning, coordination and collaboration efforts that advance preparedness and mitigation measures. The goal to reduce or alleviate flood 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 to enhance FEMA’s HMGP funding of parish hazard mitigation dollars with the aim of focusing on large infrastructure projects that benefit regional watersheds. These may include floodplain restoration and preservation, flood storage, critical facilities and infrastructure flood mitigation, stormwater management and other mitigation activities that benefit targeted 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 preparedness and mitigation measures will be integrated into rebuilding activities for both non-federal cost share programs. These measures are built within the FEMA structure and the state will 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	476	475,214,862	443,742,610	31,472,252
B - Emergency Measures	952	1,194,431,986	1,089,600,457	104,831,529
C - Roads and Bridges	61	17,709,279	15,938,351	1,770,928



PA CATEGORY	# DAMAGED SITES	SUM OF APPROX. COST	SUM OF FEDERAL SHARE	SUM OF NON-FEDERAL SHARE
D - Water Control Facilities	61	49,855,528	44,869,975	4,985,553
E - Building and Equipment	1,188	688,888,779	619,999,902	68,888,877
F - Utilities	92	359,949,315	323,954,384	35,994,931
G - Other	200	35,120,530	31,608,477	3,512,053
All Categories	3,030	2,821,170,279	2,569,714,156	251,456,123
TOTAL - without A and B:	1,602	1,151,523,431	1,036,371,089	115,152,342

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	\$475,214,862	\$31,472,252	\$71,282,229	\$102,754,481
B - Emergency Measures	\$1,194,431,986	\$104,831,529	\$179,164,798	\$283,996,327
C - Roads and Bridges	\$17,709,279	\$1,770,928	\$2,626,392	\$4,427,320
D - Water Control Facilities	\$49,855,528	\$4,985,553	\$7,478,329	\$12,463,882
E - Building and Equipment	\$688,888,779	\$68,888,877	\$103,333,317	\$172,222,194
F - Utilities	\$359,949,315	\$35,994,931	\$53,992,397	\$89,987,329
G - Other	\$35,120,530	\$3,512,053	\$5,268,079	\$8,780,132
Total	2,821,170,279	251,456,123	423,175,542	674,631,665

Data Source(s): GOHSEP



Approximate Recovery Cost per Agency

AGENCY	APPROXIMATE COST
City or Township Government	\$19,928,213.93
County Government	\$30,378,084.21
Independent School District	\$52,240,978.30
Indian/Native American Tribal Government (Federally Recognized)	\$3,605,000.00
Indian/Native American Tribally Designated Organization	\$
Nonprofit with 501C3 IRS Status	\$53,659,565.31
Nonprofit without 501C3 IRS Status	\$9,339,500.00
Public/Indian Housing Authority	\$1,367,201.39
Public/State Controlled Institution of Higher Education	\$239,133.69
Special District Government	\$26,823,575.19
State Government	\$53,874,871
Total	251,456,123

Data Source(s): GOHSEP

Hazard Mitigation Needs per County or Known Project (as applicable)

PROJECT	COST	FUNDING SOURCE	UNMET NEED (10% LOCAL MATCH)
Statewide	\$505,147,256		\$126,286,814
Total	\$505,147,256		\$126,286,814

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 as a result of the 2020 disasters, 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 May 2021 floods and Hurricane Ida, 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. The study conducted by LED for May 2021 floods was not as extensive as the IDA study. Key findings from these assessments follow.

The peak business disruption impacts across Louisiana include:

- May 2021 Flood: 8,186 business operations, over 6% of all businesses in Louisiana
- Ida: 59,345 business operations, over 47% of all businesses in Louisiana

The number of employees impacted at peak of hurricanes includes:

- May 2021 Flood: 106,097
- Ida: 700,461, nearly 42% of all Louisiana workers.

The estimated damages to business total almost \$13B:

- May 2021 Flood: \$33.6 million in structures and equipment
- May 2021 Flood: \$90.6 in interruption loss (lost labor productivity and value added costs.)
- Ida: \$6.8 billion in structural damage;
- Ida: \$2.2 billion in equipment loss;
- Ida: \$3.5 billion in interruption loss (lost labor productivity and value added costs.)

BUSINESS & WAGE LOSSES

The LED-commissioned study for May 2021 Floods measured business losses starting May 17 – May 19, 2021. For Ida the study 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.

For Ida, 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.

To characterize business disruption losses, the LED study for Ida estimated: 1) the number of business damaged and 2) the number of employees impacted each day of the study period for 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 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.

Hardest Hit Parishes May 2021 Floods: The impact of flooding on business operations varied by parish and industry. The largest impact occurs in East Baton Rouge Parish due to the population size of the parish. As a percent of total businesses and workers, Calcasieu was most effected with 35% of the workforce not working on May 18 due to the flooding event. Statewide, it is estimated that roughly 6% of all workers were off due to the flooding event on the peak day of May 18. In most cases, operations returned to normal on May 19 though some businesses remained closed due to the flooding damages sustained. To get a better measure of the full impact of the event, the study estimated the lost productivity and lost value added due to the flooding for the period of May 17-May 31.

Hardest Hit Parishes Ida: The hardest hit areas primarily due to their concentration of businesses and proximity to Ida’s landfall, Jefferson and Orleans Parishes, had a combined nearly 25,000 businesses and 280,000 employees

impacted. Even though East Baton Rouge Parish was not as near to Ida’s landfall as these other two parishes, the storm’s winds were still hurricane force impacting over 10,000 businesses and over 147,000 employees.

Finally, the LED study provided an economic estimate of damages to business structures and equipment attributable to Hurricane Ida. 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 parishes that received significant impacts: Lafourche, Terrebonne, Ascension, East Baton Rouge, Jefferson, Livingston, Orleans, Plaquemines, St. Charles, St. John, St. Tammany, and Tangipahoa. 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 IDA MODEL ESTIMATES \$6.8 BILLION IN DAMAGE TO BUSINESS STRUCTURES. THE LARGEST IMPACTS OCCUR FOR JEFFERSON PARISH WITH OVER \$1.8 BILLION, LAFOURCHE \$927.2 MILLION AND TERREBONNE PARISH WITH \$800 MILLION IN DAMAGES. THE MODEL ADDITIONALLY ESTIMATES MORE THAN \$2.2 BILLION IN DAMAGE TO BUSINESS EQUIPMENT. JEFFERSON PARISH REGISTERS THE LARGEST ESTIMATED DAMAGES WITH \$577.2 MILLION.

AGRICULTURAL LOSSES

Based on estimates completed by the LSU AgCenter, the economic impacts from Hurricane Ida on Louisiana’s agricultural sector are estimated to be \$584 million. Timber losses for Hurricane Ida totaled just over a quarter of a million dollars for 125,000 acres in Livingston, St. Charles, and Tangipahoa parishes.

Table below gives the different types of agricultural losses.-

AGRICULTURAL LOSSES

TYPE OF LOSS	IDA	TOTAL
Reduced Production	\$59,792,787	\$59,792,787
Livestock Loss	\$1,558,252	\$1,558,252
Infrastructure Damage	\$207,126,813	\$207,126,813
Timber Losses	\$315,946,540	\$315,946,540
Total Losses	\$584,424,392	\$584,424,392

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. To date, 11,988 loans have been applied for with 1,685 approved for a total of \$105,797,850.

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 \$6.9 billion in economic unmet needs.

SUMMARY OF ECONOMIC UNMET NEEDS

TYPE OF LOSS	TOTAL
Business Structures	\$6,867,000,000
Business Equipment	2,184,200,000
Business Interruption ¹	2,576,400,000
Agriculture/Timber	584,424,392
Business/EIDL Loans	(105,797,850)
Paid/Reserves of Reported Claims	(5,131,748,513)
Total Unmet Needs	6,974,478,029

¹ includes labor productivity and value-added losses

Total Business Loans Approved by the SBA

COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Ascension	n/a	19
Assumption	n/a	4
Calcasieu	n/a	14
East Baton Rouge	n/a	48
Iberia	n/a	1
Iberville	n/a	3
Jefferson	n/a	407
Lafourche	n/a	132
Lafayette	n/a	1



COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Livingston	n/a	26
Orleans	n/a	456
Plaquemines	n/a	31
St Bernard	n/a	27
St Charles	n/a	79
St Helena	n/a	2
St James	n/a	13
St John the Baptist	n/a	61
St Mary	n/a	3
St Tammany	n/a	93
Tangipahoa	n/a	74
Terrebonne	n/a	180
Washington	n/a	10
West Baton Rouge	n/a	1
Total	n/a	1,685

Data Source(s): SBA

SBA Applicant Breakdown

APPLICATION TYPE	# OF APPLICATIONS	PERCENT
Total Business Applications	11,988	100%
Processed Applications	11,985	99%
In-Process Applications	4	0%
Declined Applications	5,634	47%
Withdrawn Applications	4,194	35%
Approved Applications	1,685	14%

Data Source(s): SBA



Estimating Business Operations Losses

OPERATIONAL LOSS CATEGORY	COUNT OF BUSINESSES WITH VERIFIED LOSSES	AVERAGE VERIFIED LOSS	ESTIMATED ADDITIONAL LOSSES TO BUSINESSES
Furniture			
Machinery	29,673	\$303,904	\$9,017,600,000
Inventory			
Other	29,673	\$137,013	\$4,065,524,392
Total	59,345	220,459	13,083,124,392

Data Source(s): Louisiana Department of Economic Development, Ida

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
Total							

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 such as MIT-Buyout. Also, the state will be including mitigation efforts within both direct allocation program.

3. GENERAL REQUIREMENTS

A. CITIZEN PARTICIPATION

Outreach and Engagement

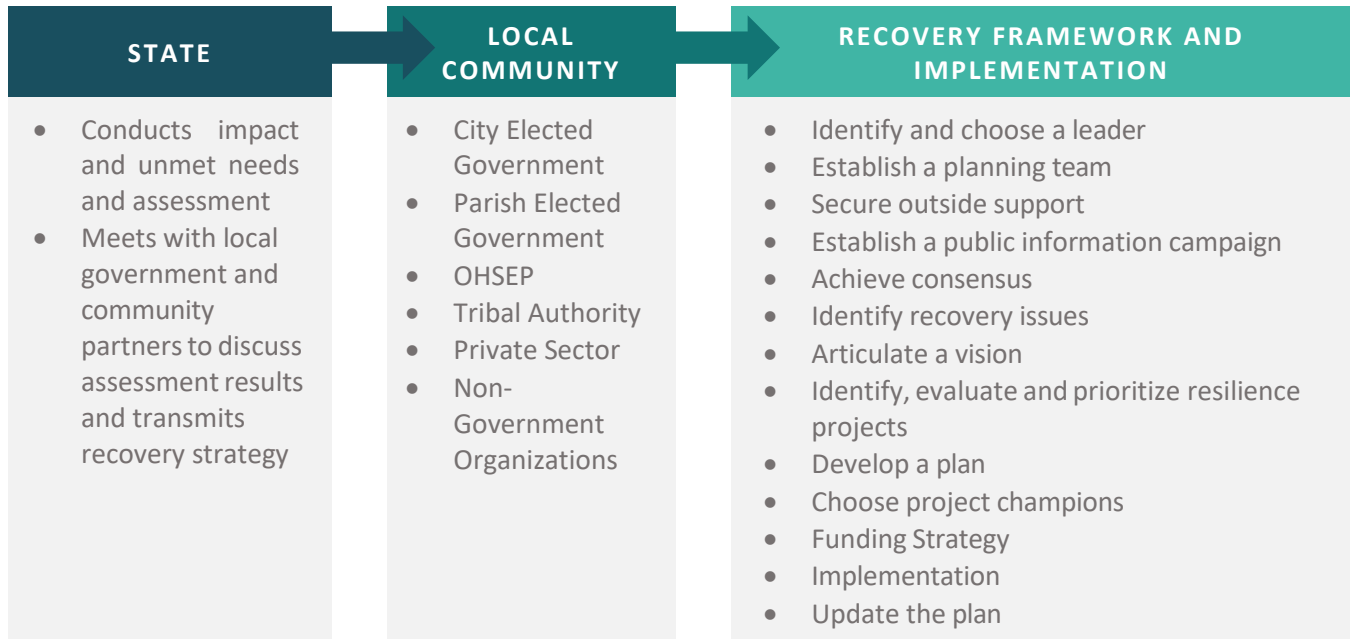
In the development of this disaster recovery Action Plan, *Louisiana Office of Community Development-Disaster Recovery Unit* consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure 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 access 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, have 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 needs and available resources have included, but are not 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 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 for 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” in 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

The Bayou Lafourche Band, Grand Bayou Indian Village, Grand Caillou/Dulac Band, Jean Charles Choctaw Nation, Pointe-Au-Chien Indian Tribe, and United Houma Nation, all of which fall under the auspices of The Tribal Affairs Office located in the Governor’s Office, were impacted by Hurricane Ida and the May 2021 Floods. As such, OCD held a meeting with tribal leaders on May 16, 2021, in consultation with the Tribal Affairs Office, to include the respective communities’ needs in program budget allocations. Additionally, tribe representatives will be invited to participate in the Action Plan public hearings and meetings held in their respective regions. 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: May 16, 2022

Action Plan Briefing and Public Comment with Impacted Tribes: June 29, 2022

Local Governments

The state has undergone a robust and ongoing dialogue across the state within the impacted communities for Hurricane Ida, 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.

Equal Access to Information

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; or

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

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/doa/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](https://www.doa.la.gov/doa/ocd/) citizen participation plan that can be found at <https://www.doa.la.gov/doa/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 six 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
Meeting #1	June 20, 2022	In-Person	Terrebonne and Lafourche Parishes
Meeting #2	June 21, 2022	Virtual	Statewide
Meeting #3	June 22, 2022	In-Person	Jefferson Parish
Meeting #4	June 23, 2022	In-Person	Tangipahoa Parish
Meeting #3	June 29, 2022	In-Person	St. John the Baptist and St. Charles Parishes

**Public hearing dates may be subject to change*

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) *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* 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 a program, 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/dao/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 OTHER ENTITIES

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. 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.

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 disasters¹⁴. 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 businesses¹⁵.

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 payments¹⁶. 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.

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 below¹⁷.

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 [†]	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%

¹⁴ NOAA. *Billion-Dollar Weather and Climate Disasters: Events*.

¹⁵ FEMA. *Disaster Declaration for States and Counties*.

¹⁶ 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.

¹⁷ GOHSEP. “*Repetitive Loss Strategy*” (Appendix to the 2019 State of Louisiana Hazard Mitigation Guide).



DISASTER TYPE	EVENTS	EVENTS/ YEAR	PERCENT FREQUENCY	TOTAL COSTS	PERCENT OF TOTAL COSTS
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 coast¹⁸.

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
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.

¹⁸ NOAA. [Billion-Dollar Weather and Climate Disasters: Events](#)



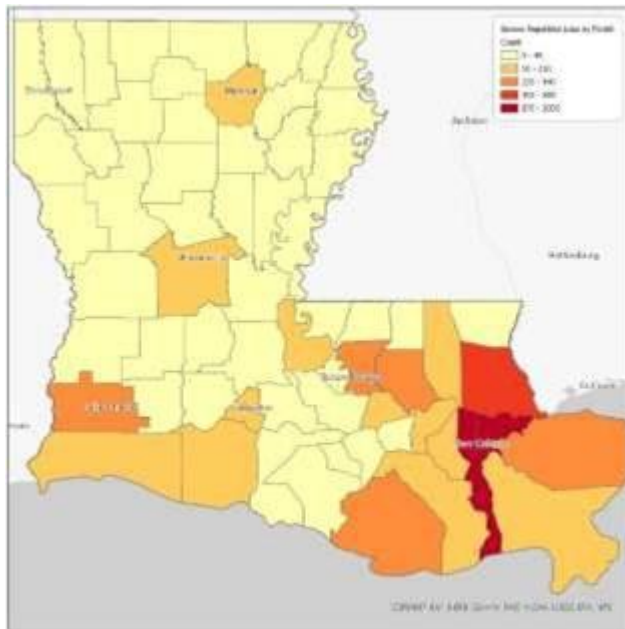
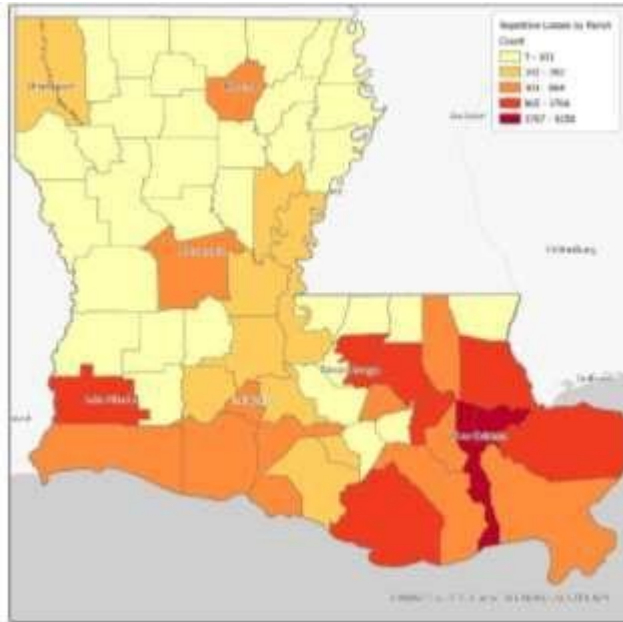
All parishes in the state of Louisiana participate in the NFIP. As of October 2021, there were 507,929 NFIP policies in force across the state.

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 2043¹⁹. 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
Tornado	\$31,725,662	\$281,804	\$32,007,466

¹⁹ LSU, Economics & Policy Research Group. [Regional Impacts of Coastal Land Loss and Louisiana’s Opportunity for Growth](#)



PROJECTED AVERAGE ANNUAL LOSS IN 2043	BUILDING AVERAGE ANNUAL LOSS	CROP AVERAGE ANNUAL LOSS	TOTAL AVERAGE ANNUAL LOSS
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

⁶ 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.

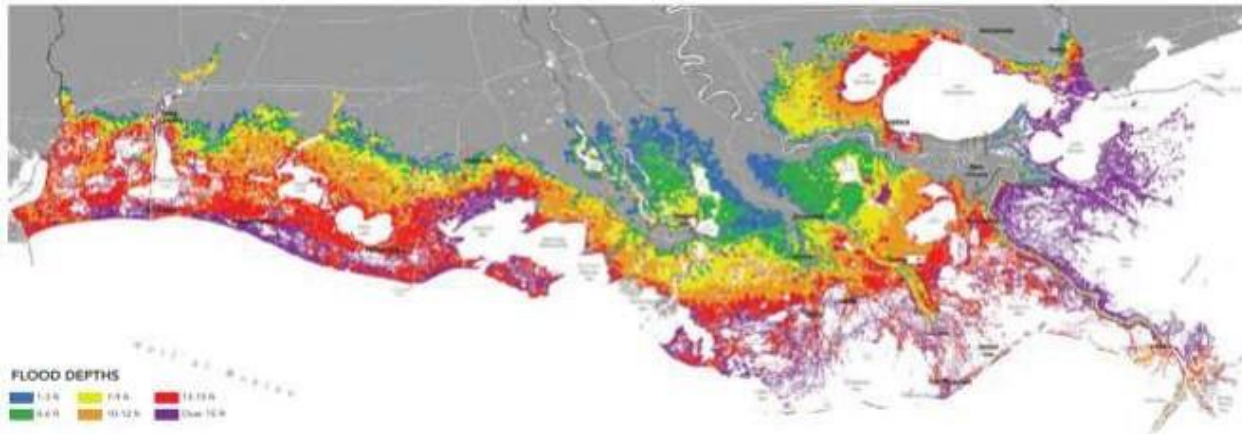


Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action

Source: http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_Final-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 world²⁰. 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 exposure²¹.

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.

²⁰ LA GOHSEP, 2019. "Repetitive Loss Strategy" – Appendix to the 2019 State of Louisiana Hazard Mitigation Plan Update.

²¹ GOHSEP, 2018. Hazard Identification and Risk Assessment.

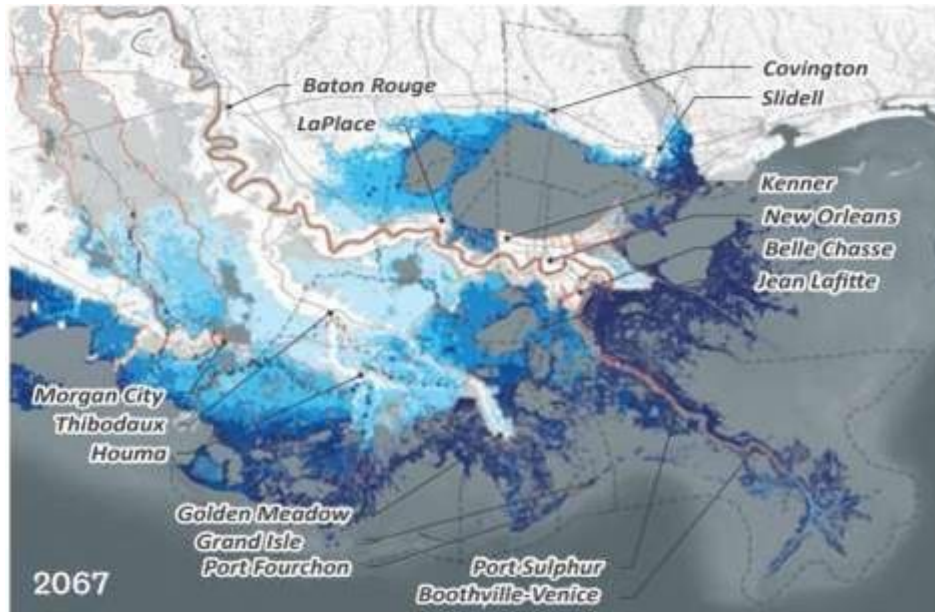


Figure: 2067 Coastal Flood Risk Projections (No Action)

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 profile²² 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 variability²³, 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 Midwest²⁴ that can pose an elevated threat when combined with extreme precipitation or wind events.

²² Footnote GOHSEP. *State of Louisiana Hazard Mitigation Guide*. 2019

²³ Linda Benedict and John M. ‘Jay’ Grimes, III. “*Precipitation Patterns Over the Bayou State*.” 11/30/2011.

²⁴ 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 confidence²⁵. 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:

²⁵ 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 a "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⁽¹⁾. 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 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^[2] 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.

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



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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. GRANTEE PROPOSED USE OF FUNDS

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. Hurricane Ida 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 \$1.4 billion. 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, provide for non-federal match for both FEMA PA and HMGP and allocate funds directly to the most impacted areas. 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 \$1.272 billion to address identified unmet needs as outlined above. Of this, \$380 million will be dedicated to meet the unmet housing needs, including rehabilitation of owner-occupied households \$487 million will be dedicated repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$120 million dedicated to assist small businesses impacted by these disasters. The state will dedicate \$232 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements as well as a direct allocation and economic revitalization to the most impacted areas.

As required by the Federal Register Notice, 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 26 HUD-identified MID areas for Hurricanes Ida and the May 2021 Floods. 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 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 Hurricane Ida:

- 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. The Program will allow repairs to manufactured homes where feasible and safe. The Program will have specific policies related to when a manufactured housing unit can be repaired based on the age of the unit and the extent of damaged.

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 from Hurricane Ida and the May 2021 Floods 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 goods 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.
- Provide assistance to commercial areas to ensure that commercial tenants, customers and jobs are restored

INFRASTRUCTURE

Investments in infrastructure repair and rebuilding in areas impacted by Hurricane Ida 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. The state will also allocate funds directly to the most damaged areas to address unmet needs not eligible for the FEMA programs.

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

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$425,000,000.00	\$340,000,000.00	\$85,000,000.00	33.40%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Buyout	\$30,000,000.00	\$24,000,000.00	\$6,000,000.00	2.36%	\$250,000.00	Low- and moderate-income or Urgent Need	0
	New Construction	\$402,873,287.00	\$322,298,629.60	\$80,574,657.40	31.66%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00	0.79%	\$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	\$45,695,232.00	\$36,556,185.60	\$9,139,046.40	3.59%	\$150,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$75,000,000.00	\$75,000,000.00	\$0.00	5.89%	\$0.00	Low- and moderate-income, elimination of slum/blight or Urgent Need	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



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
	Other	\$232,883,641.00	\$196,306,912.14	\$36,576,728.86	18.30%	\$28,000,000.00	Low- and moderate-income, elimination of slum/blight or Urgent Need	0
PUBLIC	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	\$49,893,840.00	\$39,915,072.00	\$9,978,768.00	3.92%	\$0.00	Low- and moderate-income or Urgent Need	0
PLANNING	Planning	\$1,000,000.00	\$800,000.00	\$200,000.00	0.08%	\$0.00	Low- and moderate-income or Urgent Need	0
TOTAL		\$1,272,346,000.00	\$1,042,876,800.00	\$229,469,200.00	100.00			

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

Connection to Unmet Needs

As required by the FR-6326-N-01, *Louisiana Office of Community Development - Disaster Recovery Unit* will allocate at least 80 percent of the funds to address unmet needs in HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a presidential major disaster declaration for Hurricanes Ida and the May 2021 Floods.

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 Hurricane Ida.

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 22 HUD-identified most impacted and distressed areas for Hurricane Ida and the May Flood. 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 the administration of the grant. Also, as required by the Federal Register Notice, the state will spend no less than 70 percent of the allocated funds on activities that benefit low- and moderate-income (LMI) households.

Hurricane Ida 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 providing 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, commercial areas and provide for a 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 \$1.272 billion to address identified unmet needs as outlined above. Of this, \$380 million will be dedicated to meet the unmet housing needs, including rehabilitation of owner-occupied households \$487 million will be dedicated to repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$120 million dedicated to assisting small businesses impacted by these disasters. The state will dedicate \$232 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements as well as a direct allocation and economic revitalization to the most impacted areas.

Due to the limited funds received in this allocation, the state has prioritized vulnerable populations throughout each program 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 project 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.

A. 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-DF-22-0001	\$1,000,000.00	\$800,000.00	\$200,000.00

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 Ida and/or the May 2021 Severe Storms 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: Benefit 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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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.

Program Estimated Begin and End Dates

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



INTERIM HOUSING ASSISTANCE

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$3,000,000.00	\$2,400,000.00	\$600,000.00

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 Ida and/or the May 2021 Severe Storms 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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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.

Program Estimated Begin and End Dates

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



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-DF-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. 6326- N-1

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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.



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COMMUNITY
DEVELOPMENT

Program Estimated Begin and End Dates

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



NEIGHBORHOOD LANDLORD RENTAL PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-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 Hurricane Ida and/or the May 2021 Severe Storms 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 Ida and/or the May 2021 Severe Storms. 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. 6326-N-01

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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 Ida and/or the May 2021 Severe Storms 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.

Program Estimated Begin and End Dates

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



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-DF-22-0001	\$6,000,000.00	\$4,800,000.00	\$1,200,000.00

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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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: \$5,000 per year

Program Competitive Application Overview (if applicable)

Not applicable.



LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

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.

Program Estimated Begin and End Dates

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



RAPID REHOUSING PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00

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 Ida and/or the May 2021 Severe Storms 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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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.

Program Estimated Begin and End Dates

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



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-DF-22-0001	\$407,873,287	\$326,298,629.60	\$81,574,657.40

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 Hurricane Ida and/or the May 2021 Severe Storms.

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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 \$15 million.

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.

Program Estimated Begin and End Dates

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



RESTORE LOUISIANA HOMEOWNER PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$380,000,000.00	\$304,000,000.00	\$76,000,000.00

Narratives

Program Description

The Restore Louisiana Homeowner Program (RLHP) will provide critical support to homeowners impacted by Hurricane Ida. 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 Ida and/or the May 2021 Severe Storms.

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>RESTORE LOUISIANA Homeowner Assistance Program</p>	<p>Based on current funding limitations and federal guidance, to be placed in a phase, you must have:</p> <p>(1) owned and still own the damaged home (2) occupied the home at the time of the disaster (3) sustained major/severe damage (per FEMA) (4) NOT received or expect to receive structural insurance payments greater than \$25k</p>
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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				✓		
	OTHER IMPACTED	N/A	N/A	N/A		✓	N/A
HOMEOWNER 62+ AND/OR HOUSEHOLD MEMBER WITH DISABILITY	YES		✓				
	NO	N/A		✓	N/A	N/A	N/A
STATUS OF REPAIRS	COMPLETE						✓
	INCOMPLETE	N/A	N/A	N/A	✓	✓	

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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 Hurricane Ida and/or the May 2021 Severe Storms
- 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). 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 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.

Program Estimated Begin and End Dates

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

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-DF-22-0001	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00

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 Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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 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.

Program Estimated Begin and End Dates

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



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-DF-22-0001	\$42,095,605	\$33,676,484.00	\$8,419,121.00

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.

How Will Program 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.

How Will Program 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.

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

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.

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.

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-DF-22-0001	\$140,788,036	\$112,630,428.00	\$28,157,607.00

Narratives

Program Description

Investments in infrastructure repair and rebuilding in areas impacted by Hurricane Ida and/or the May 2021 Severe Storms 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 Will Program 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.

How Will Program 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.

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

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.

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

RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$50,000,000.00	50,000,000.00	\$0.00

Narratives

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance

How Will Program Address Disaster-Related Storm Water Mgmt/Other Systems

Each eligible activity application will be required to describe sustainable practices focusing on reducing runoff and improving water quality, including mitigation of future flood risk.

How Will Program Advance Long-Term Resilience

The program will require mitigation components to be included within the scope(s) of awarded projects in order to advance long-term resilience.

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.

Program National Objective(s)

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



Program Eligibility

Program Eligible Activities:

105(a) 1-5, 7-9, 11-12, 16

Eligible Applicants:

Units of general local government (UGLG)

Program Responsible Entity

The state of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the being and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

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

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)



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-DF-22-0001	\$45,695,232.00	\$36,556,186.00	\$9,139,046.00

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 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 \$150,000, with exceptions allowing for up to a maximum award of \$250,000.

The state will include its exceptions policy in the program policies and procedures.

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.

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 program 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).



HOMETOWN REVITALIZATION PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$75,000,000.00	\$75,000,000.00	\$0.00

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MIDs impacted by the disaster. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

Program National Objective(s)

- Benefit to low-and moderate-income persons;
- Aid in the prevention or elimination of slums or blight

Program Eligibility

Program Eligible Activities:

105(a) 8, 12, 14-15, 17, 19, 21-22

Eligible Applicants:

Units of general local government (UGLG)



Program Responsible Entity

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

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

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

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)

Uses of funds may include, but may not be limited to:

- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Façade improvements to private or public structures in commercial areas.

5. APPENDIX

A. CERTIFICATIONS

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- 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, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- d. 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, except where waivers or alternative requirements are provided for in this Notice.
- e. 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 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). 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 notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - i. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).



- ii. 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.
- iii. 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 of the grant amount is expended for activities that benefit such persons.
- iv. 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).
- i. The grantee certifies that it will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
- j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - i. 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
 - ii. 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.
- k. Each State receiving a direct award under this Notice 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 of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.



- I. The grantee will not use grant 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 recent 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 plan 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.
- m. 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.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
- o. The grantee certifies that it will comply with applicable laws.

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

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 area 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 household 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 to flooding. It would be inappropriate to construct new affordable units in neighborhoods subject to substantial flood risk, as that would be 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 to 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 factors 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.

2. CLARIFICATION/MODIFICATION OF LACK OF FLOOD INSURANCE PENALTY OF CONSOLIDATED NOTICE SECTION IV.E.2.B

The Consolidated Notice, at Section IV.E.2.b., imposes a prohibition on the reconstruction or rehabilitation of a home in a floodplain if the homeowner did not have a flood insurance policy in effect and the household income is above 120% AMI. A reasonable interpretation of this section is the implied conclusion that the damage to the home was the result of flood waters for which the flood policy could provide coverage. The limitation would not apply to a home that sustained wind or other damage not the result of flooding.

The state has responded affirmatively to the form certifications provided by HUD with respect to this limitation but notes here the state's interpretation of the limitation and associated certification. If HUD has a different interpretation, the state asks that HUD clarify the provision. If HUD's interpretation is that the limitation should apply regardless of the cause of damage to the home, the state requests that HUD modify the provision to limit its application to flood damage.

3. EXTENSION OF TENANT-BASED RENTAL ASSISTANCE

The State of Louisiana is requesting a waiver of 42 U.S.C. 5305(a) in order to provide tenant-based rental assistance to households impacted by the disaster to the extent necessary to make eligible rental assistance and utility payments paid for up to 2 years on behalf of homeless and at-risk households when such assistance or payments are part of a homeless prevention or rapid rehousing program or activity, as well as for interim housing for grant recipients during the repair or reconstruction of their homes. While existing CDBG regulations may allow payments for these purposes, grantees under the annual CDBG programs are subject to a much shorter time limitation (3 months).

This waiver will assist individuals and families – both those already receiving rental assistance as well as those who will receive rental assistance subsequently - to maintain stable, permanent housing and help them return to their hometowns as desired when additional permanent housing is available or when their homes have been restored.

It will also provide additional time to stabilize individuals and families in permanent housing where rents are higher than is typical for the area and vacancy rates are extraordinarily low while damaged homes continue to be repaired.

Based on the experience in prior disaster recovery programs, the state submits this extended time frame is to meet the ongoing needs resulting from the storms.

4. WAIVER OF 70 PERCENT OVERALL BENEFIT FOR LOW- AND MODERATE-INCOME (LMI) PERSONS/FAMILIES

The State of Louisiana is requesting a waiver of 42 U.S.C. 5305(a) in order to provide tenant-based rental assistance to households impacted by the disaster to the extent necessary to make eligible rental assistance and utility payments paid for up to 2 years on behalf of homeless and at-risk households when such assistance or payments are part of a homeless prevention or rapid rehousing program or activity, as well as for interim housing for grant recipients during the repair or reconstruction of their homes. While existing CDBG regulations may allow payments for these purposes, grantees under the annual CDBG programs are subject to a much shorter time limitation (3 months).

5. REIMBURSEMENT FOR NEW CONSTRUCTION

The Federal Register Notice authorizes reimbursement for a number of eligible activities but did not include New Construction as one of those activities for which the state could issue payments in reimbursement of costs incurred prior to the grant.

Louisiana's CDBG-DR programs have included successful multifamily affordable housing programs where CDBG DR funds provided gap financing. These programs were initiated following the traditional processes of appropriation, allocation, approval of action plans, and initiation of loan offering processes. The result is a significant passage of time between a disaster event and the commencement of construction. The development often includes new construction.

The State, working with stakeholders in the affordable housing industry, is eager to create a framework that would allow efforts to create new affordable housing to be initiated as quickly as possible following a presidentially declared disaster. While an appropriation of CDBG-DR funds is never a certainty, the goal would be for bridge financing of construction activities to allow the creation of affordable housing to commence, to then be replaced with a permanent loan of CDBG-DR funds once available.

To maximize this effort, it is important that the ability to reimburse pre-award activities to include new construction. The State suggests that this alternative process could include the steps involved in environmental reviews prior to commencement of construction, to be formalized by a notice of release of funds once the CDBG-DR funds are ultimately available to the state.

6. REIMBURSEMENT PERIOD FROM DATE OF DECLARED DISASTER PRIOR THROUGH DATE OF APPLICATION TO STATE

Given the passage of time between the occurrence of hurricanes Laura and Delta and the allocation of CDBG-DR funds to the State of Louisiana in connection with that event, Louisiana Requests that the reimbursement period be extended through one year following the grant agreement to be entered between HUD and the State of Louisiana.

7. GUIDANCE REGARDING DAVIS BACON FOR ELIGIBLE PROJECTS COMMENCED PRIOR TO CDBG-DR AVAILABILITY

While HUD does not have the authority to waive requirements related to Davis Bacon, the State does seek HUD's assistance in securing guidance from the U.S. Department of Labor as obtained in previous programs. The State's Laura Delta Action Plan submitted includes a program utilizing CDBG-DR as a match for other sources that do not require compliance with Davis Bacon, with many projects already underway or even completed prior to the availability of CDBG-DR funds. In the past, HUD has, at Louisiana's request, addressed this issue with the U.S. Department Labor, which has issued guidance on the implementation of Davis Bacon under such circumstances. The Department of Labor issued such guidance by letter dated February 1, 2018, directed to Mr. Stanley Gimont, Deputy Assistant Director for Grant Programs, which agreed to a prospective application of Davis Bacon. Because that correspondence was specific to the 2017 grant issued by HUD to Louisiana for the 2016 Floods, out of an abundance of caution the State requests similar guidance relative to Hurricanes Laura and Delta. As a preemptive matter, the State also requests that the guidance also include similar programs which it anticipates will be submitted in a forthcoming action plan for Hurricane Ida.

C. SUMMARY AND RESPONSE OF PUBLIC COMMENTS

The public comment period initially began on June 1, 2022 and ended on July 1, 2022. The plan had modifications to include HUD's announcement of additional funding and change in MID's for Hurricane Laura and Delta. Additionally this amendment includes unmet needs assessment, program descriptions, and budgets for Hurricane Ida and the May floods of 2021. 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: APA1_Public Comments_Compiled_LDIDAMay21.

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

6. ATTACHMENTS

I. OCD DISASTER OUTREACH MEETINGS, 2022

Hurricane Ida Disasters Outreach Meetings

DATE	HOST	ATTENDEES	PURPOSE
January 11, 2022	RSF1 OCD/FEMA State Library/Baton Rouge	Government officials of Terrebonne, East Feliciana, Ascension, and St. James parishes	Session 2: Just-in-Time Recovery Training
January 13, 2022	RSF1 OCD/FEMA Regional Planning Commission New Orleans	Government officials of Plaquemines, St. Bernard, and Jefferson parishes; South Central Planning Commission, Regional Planning Commission, City of Bogalusa, Tribal Councils	Session 2: Just-in-Time Recovery Training
January 14, 2022	RSF1 OCD/FEMA Tangipahoa Parish	Mayor's representative, EOC director	Training available
January 18, 2022	RSF1 OCD/FEMA Town of Westwego	Mayor Robert Billiot	Scoping meeting response/recovery
January 18, 2022	RSF1 OCD/FEMA St. Bernard Parish	Parish president, Director of All South Consulting Engineers	Types of recovery strategies to consider
January 19, 2022	RSF1 OCD/FEMA City of Gretna	Major Belinda Constant	Coordination state for response/recovery
January 19, 2022	RSF1 OCD/FEMA Plaquemines Parish	Parish president, EOC Director	Exploratory meeting needs/support available
January 26, 2022	RSF1 OCD/GOHSEP/FEMA	Acadiana, Capital Area, South Central Planning, Metro Area/Orleans Regional Planning Commissions	Roundtable discussion community impact and organizational capacity needs as a result of Ida



February 3, 2022	RSF1 OCD/FEMA Bayou Community Foundation/Houma	Foundation Director, South Central Planning Commission, Terrebonne and Lafourche Parishes, OCD, and FEMA	Planning discussion for developing long-term regional plan for Terrebonne, Lafourche, and Grand Isle
February 8, 2022 and February 24, 2022	RSF 1 OCD/GOHSEP/FEMA Town of Grand Isle	Mayor David Camardelle, Jefferson Parish Environmental Staff, City Council Representatives, Local Engineers, U.S. Army Corps of Engineers	Urgency of debris removal of vessels from waterways, funding, permits, funding available for long-term recovery
February 9, 2022 and March 15, 2022	RSF 1 OCD/FEMA City of Kenner	EOC Director, Dept. of Community Development	Assess emergency management/recovery capabilities
February 10, 2022, March 7, 2022, and March 10, 2022	RSF1 OCD/FEMA Town of Jean LaFitte	Mayor Timothy Kerner Jr. CFM manager, capital Projects Director, GOSHEP	Coordination, state/local capacity building for recovery, financial assistance
February 22, 2022	RSF 1 OCD/FEMA Crown Plaza Hotel Baton Rouge	Louisiana Municipal Association Mid-Year Conference by invitation/Outreach/TA of attending 200+ Mayors/Elected Officials	Information/TA by OCD and FEMA on Laura and Ida recovery support
March 8, 2022	RSF 1 OCD/FEMA/EDA Harahan/Jefferson Parish	Government officials of Terrebonne, St. Charles, Assumption, Lafourche parishes; Sheriff's Office/Terrebonne; Representative for State Representative for District 20	Session 3: Just-Time Recovery Training
March 28, 2022	RSF1 OCD/FEMA Lafourche Parish	Kristi Lumpkin, Director of Planning	Long-term recovery planning and support; database of businesses; housing issues



April 5, 2022	RSF 1 OCD/FEMA/GOHSEP EOC Terrebonne Parish	Government officials of Terrebonne, St. Charles, Assumption, Lafourche parishes; Sheriff’s Office/Terrebonne; Representative for State Representative for District 20	Session 3: Just-Time Recovery Training
April 6, 2022	RSF 1 OCD/FEMA/GOHSEP Council Chambers St. Tammany Parish	Government officials for Jefferson, Plaquemines, St. Bernard, City of Westwego, St. Tammany, Washington, Ascension parishes, City of Kenner, West Bank Business Association	Session 3: Just-Time Recovery Training
April 12, 2022, and April 19, 2022	RSF 1 OCD/FEMA	Parish, municipal, tribal communities	Survey of Ida/Laura impacted communities – i.e. government, tribal, et. Al organizations of specific grants and grants management training in response to an identified need from all Ida impacted communities
April 18, 2022	RSF 1 OCD/FEMA/GOHSEP Jefferson Parish EOC in Harahan	Parish President, CAO & other executive staff members; Mayors of Westwego and Harahan; EOC	Briefing /Q&A by OCD, GOHSEP, FEMA, federal partners, SBA re: resources and technical assistance available



SECTION 2

AMENDMENT TO BUDGET FOR HURRICANES LAURA AND DELTA RECOVERY PROGRAMS BASED ON MARCH 2022 ALLOCATION OF \$450 MILLION

Program Budget

The below program budget table reflects the initial allocation of \$600 million for Hurricanes Laura and Delta (gray), announced in October 2021 as well as the additional funding allocation of \$450 million for Hurricanes Laura and Delta (blue), totaling over \$1 billion, announced in March 2022.

Stakeholders and community members were made aware of the revised funding allocation during the public comment period for the Hurricanes Laura and Delta Action Plan. Further, the state will continue to inform the public about the revised funding allocation during the public comment period for the Hurricane Ida and May 2021 Floods Action Plan.

With the additional allocation of \$450 million for Hurricanes Laura and Delta, the adjusted HUD-identified MID areas are as follows: Acadia (70526, 70578), Allen, Beauregard, Caddo, Calcasieu, Cameron, Jefferson Davis, Lafayette, Natchitoches, Ouachita, Rapides, St. Landry (70570), St. Martin (70517), Vermilion (70510), and Vernon (71446).

In original action plan submitted, the Resilient and Mixed Income Piggyback Program (PRIME) description had a maximum award of \$10 million for Hurricanes Laura and Delta. This amendment will increase the maximum award for this program to \$15 million to be consistent with the PRIME program for Hurricane Ida and the May 2021 Floods.

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%	\$300,000.00	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%	\$250,000.00	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%	\$300,000.00	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%	\$0.00	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%	\$0.00	0	0
	Business Grants	\$5,100,000.00 \$50,455,482.00	\$4,080,000.00 \$40,364,385.60	\$1,020,000.00 \$10,091,096.40	1% 5%	\$150,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$0.00 \$50,000,000.00	\$0.00 \$50,000,000.00	\$0.00 \$0.00	0% 5%	\$0.00	Low- and moderate-income; Urgent Need or Slum and Blight	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Health Facilities	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Other	\$185,232,774.00 \$185,232,774.00	\$148,186,219.20 \$158,186,219.20	\$37,046,554.80 \$27,046,554.80	31% 13%	\$28,000,000.00	Low- and moderate-income; Urgent Need or Slum and Blight	0
PUBLIC SERVICES	Legal Services	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Housing Counseling	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
	Other	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
ADMIN	Admin	\$23,900,000.00 \$41,900,000.00	\$19,120,000.00 \$33,520,000.00	\$4,780,000.00 \$8,380,000.00	4% 4%	\$0.00	Low- and moderate-income or Urgent Need	0
PLANNING	Planning	\$100,000.00 \$100,000.00	\$80,000.00 \$80,000.00	\$20,000.00 \$20,000.00	0% 0%	\$0.00	Low- and moderate-income or Urgent Need	0
TOTAL		\$600,131,000.00 \$1,050,267,000.00	\$480,104,800.00 \$860,213,600.00	\$120,026,200. \$190,053,400.00				

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

Amended Proposed Allocation Amounts

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

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

This amendment includes funding for two additional programs for Hurricanes Laura and Delta recovery. The two new programs, the Hometown Revitalization Program and the Resilient Communities Infrastructure Program, both have a budget of \$50 million, respectively.



To fund the \$50 million Resilient Communities Infrastructure Program, the Nonfederal Share Match Program has a reduced budget to \$100 million. The overall budget allocation for infrastructure programming does not change. The total budget for economic revitalization programming increases by \$95,355,482, taking the total from \$5,100,000 million to \$100,455,482 million. This increases the budget for Small Business Loan & Grant Program to \$50,455,482 and adds the new program, Hometown Revitalization Program for \$50 million.

ECONOMIC REVITALIZATION: HOMETOWN REVITALIZATION PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$50,000,000	\$50,000,000	\$0.00

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricanes Laura and Delta.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

Program National Objective(s)

- Benefit to low-and moderate-income persons;
- Aid in the prevention or elimination of slums or blight

Meeting a need having a particular urgency (urgent need). Program Eligibility

Program Eligible Activities:

105(a) 1-25

Eligible Applicants:

Units of general local government (UGLG)



Program Responsible Entity

Subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

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

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)

Uses of funds may include, but may not be limited to:

- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Façade improvements to private or public structures in commercial areas.



INFRASTRUCTURE: RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$50,000,000.00	\$50,000,000.00	\$0.00

Narratives

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

How Will Program Address Disaster-Related Storm Water Mgmt/Other Systems

Each eligible activity application will be required to describe sustainable practices focusing on reducing runoff and improving water quality, including mitigation of future flood risk.

How Will Program Advance Long-Term Resilience

The program will require mitigation components to be included within the scope(s) of awarded projects in order to advance long-term resilience.

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.

Program National Objective(s)

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



Program Eligibility

Program Eligible Activities:

105(a) 1-5, 7-9, 11-12, 16

Eligible Applicants:

Units of general local government (UGLG)

Program Responsible Entity

The state of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the being and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

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

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)



INFRASTRUCTURE: 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	\$100,000,000.00	\$80,000,000.00	\$20,000,000.00

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 Will Program 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.

How Will Program 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.

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 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.

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

ECONOMIC REVITALIZATION: 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	\$50,455,482.00	\$40,364,385.60	\$10,091,096.40

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 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 \$100,000, with exceptions allowing for up to a maximum award of \$250,000.

The state will include its exceptions policy in the program policies and procedures.

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.

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 Program 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).