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-6303-N-01 and FR-6236-N-01*

# State of Louisiana Substantial Action Plan Amendment No. 3 for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana

Public Comment Period for Revisions Made in Substantial Action Plan Amendment No. 3: June 7 – July 6, 2023

Submitted to HUD: July 13, 2023

# ABSTRACT

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.

## ACTION PLAN SUBSTANTIAL AMENDMENT NO. 1

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.

## ACTION PLAN SUBSTANTIAL AMENDMENT NO. 2

Following the submission of Action Plan Substantial Amendment No. 1 on July 22, 2022, the state submitted Action Plan Amendment No. 2 on December 22, 2022, for Hurricanes Laura, Delta and Ida and the May 2021 Severe Storms (*DR 4559, DR 4570, DR 4611 and DR 4606).*

This amendment is considered substantial as it comprises changes to program benefits or allocation methods. These changes are in reference to the Master Action Plan and Substantial Action Plan Amendment No. 1 previously submitted by the state.

## ACTION PLAN SUBSTANTIAL AMENDMENT NO. 3

Action Plan Substantial Amendment No. 3 is the third substantial amendment to the Louisiana Office of Community Development's (OCD) Master Action Plan for Hurricanes Laura, Delta and Ida and the May 2021 Severe Storms (*DR 4559, DR 4570, DR 4611 and DR 4606).*

The state submits Amendment III as a response to the additional $831.5 million increase in allocated funding for Hurricane Ida and the May 2021 Severe Storms as part of the Continuing Appropriations Act, 2023 (Pub. L. 117-328). This amendment establishes new programs, revises existing program budgets and narratives and updates language regarding the additional allocation throughout.

LOUISIANA Office of COMMUNITY DEVELOPMENT

# ACTION PLAN SUBSTANTIAL AMENDMENT NO. 3

## SUMMARY OF CHANGES

### OVERVIEW

Action Plan Substantial Amendment No. 3 establishes new programs, revises existing program budgets and narratives, and updates language throughout regarding the additional $831.5 million allocation for Hurricane Ida and the May 2021 Severe Storms.

This amendment is considered substantial as it comprises changes to program budgets and establishes new programs to be administered with the $831.5 million. These changes are in reference to the Master Action Plan, Substantial Action Plan Amendment No. 1 and Substantial Action Plan Amendment No. 2 previously submitted by the state.

## AMENDMENTS TO THE STATE ACTION PLAN NARRATIVE

### UNMET NEED AND PROPOSED ALLOCATION – 2020 AND 2021 (SECTION 1)

- Modifications were made to the Unmet Need and Proposed Allocation 2020 table, including:
  - Planning allocation amount modified from $100,000 to $1,100,000.
  - Housing allocation amount modified from $722,578,744 to $721,578,744.
  - Total allocation amount remains $1,050,267.
- Modifications were made to the Unmet Need and Proposed Allocation 2021 table, including:
  - Administration allocation amount modified from $49,893,840 to $91,468,940.
  - Planning allocation amount modified from $1,000,000 to $2,000,000.
  - Housing allocation amount modified from $867,873,287 to $1,396,800,187.
  - Infrastructure allocation amount modified from $232,883,640 to $402,883,641.
  - Economic Revitalization allocation amount modified $120,695,233 to $210,695,232.
  - Total allocation amount modified from $1,272,345,999 to $2,103,848,000.

## MITIGATION ONLY ACTIVITIES (SECTION 2D)

- The Mitigation Only Activities APA #3 update was modified to include: 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 and SWIFT which are eligible CDBG-DR activities. All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities such as MIT-Buyout/Safe Housing Incentives. Also, the state will be including mitigation efforts within both direct allocation program but also funding mitigation only activities within resilient infrastructure programs.
    - **Previous text**: 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.
    - APA #3 adds mention of the new SWIFT program and Safe Housing Incentives, as well as includes a reference to funding mitigation only activities within resilient infrastructure programs.

## PROGRAM BUDGET OVERVIEW (SECTION 4A)

- The Program Budget Overview section was modified to include: Louisiana Office of Community Development - Disaster Recovery Unit is the lead agency and responsible entity for administering Continuing Appropriations Act, 2023 (PL 117-180) in CDBG-DR funds allocated for disaster recovery.

  The state will dedicate this allocation of $831.5 million to address identified unmet needs programs as outlined in Substantial Amendment No. 1.

  These funds will be dedicated to existing programs identified within the Program Detail's section of this Action Plan. In addition, two new Housing programs and one Infrastructure Program have been added in the Program Detail's Section of this Action Plan.
    - **Previous text**: 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.
    - 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.

- APA #3 was modified to include the reference to the new register notice for this funding allocation and mention of dedication of funds to newly established programs.

### PROGRAM BUDGET – 2020 AND 2021 (SECTION 4A)

- Modifications were made to the Program Budget 2020 table, including:
  - New Construction budget modified from $456,078,744 to $455,078,744.
  - Planning budget modified from $100,000 to $1,100,000.
  - Total budget remains $1,050,267.
- Modifications were made to the Program Budget 2021 table, including:
  - Buyout (Housing) budget modified from $30,000,000 to $130,000,000.
  - New Construction (Housing) budget modified from $402,873,287 to $786,800,187.
  - Other (Housing) budget modified from $10,000,000 to $55,000,000.
  - Other (Economic Revitalization) budget modified from $75,000,000 to $165,000,000.
  - Other (Infrastructure) budget modified from $232,883,641 to $402,883,641.
  - Admin (Admin) budget modified from $49,893,840 to $91,468,940.
  - Planning (Planning) budget modified from $1,000,000 to $2,000,000.
- Budget category totals modified as follows:
  - Total budget modified from $1,272,346,000 to $2,103,848,000.
  - HUD identified MID budget modified from $1,042,876,800 to $1,608,303,249.
  - Grantee identified MID budget modified from $229,469,110 to $402,075,811.

## AMENDMENTS TO THE STATE ACTION PLAN PROGRAM DETAILS

### INTERIM HOUSING ASSISTANCE

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $2,000,000.
  - Proposed HUD-identified MID budget: $1,600,000.
  - Proposed Grantee-identified MID budget: $400,000.

- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$ 6,000,000.00** | **$ 4,800,000.00** | **$ 1,200,000.00** |
| B-21-DF-22-0001 | **$ 3,000,000.00** | **$ 2,400,000.00** | **$ 600,000.00** |
| B-21-DZ-22-0001 | **$ 1,000,000.00** | **$ 800,000.00** | **$ 200,000.00** |
| B-22-DF-22-001 | **$2,000,000.00** | **$1,600,000.00** | **$400,000.00** |

## PERMANENT SUPPORTIVE HOUSING PROGRAM (PSHP)

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $20,000,000.
  - Proposed HUD-identified MID budget: $16,000,000.
  - Proposed Grantee-identified MID budget: $4,000,000.
- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$ 31,000,000.00** | **$ 24,800,000.00** | **$ 6,200,000.00** |
| B-21-DF-22-0001 | **$ 6,000,000.00** | **$ 4,800,000.00** | **$ 1,200,000.00** |
| B-21-DZ-22-0001 | **$ 5,000,000.00** | **$ 4,000,000.00** | **$ 1,000,000.00** |
| B-22-DF-22-001 | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |

## RAPID REHOUSING PROGRAM

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $10,000,000.
  - Proposed HUD-identified MID budget: $8,000,000.
  - Proposed Grantee-identified MID budget: $2,000,000.

- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$25,000,000.00** | **$20,000,000.00** | **$5,000,000.00** |
| B-21-DF-22-0001 | **$10,000,000.00** | **$8,000,000.00** | **$2,000,000.00** |
| B-21-DZ-22-0001 | **$5,000,000.00** | **$4,000,000.00** | **$1,000,000.00** |
| B-22-DF-22-001 | **$10,000,000.00** | **$8,000,000.00** | **$2,000,000.00** |

## RESILIENT MIXED INCOME GAP FUNDING PROGRAM (PRIME)

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $383,926,900.
  - Proposed HUD-identified MID budget: $307,141,520.
  - Proposed Grantee-identified MID budget: $76,785,380.
- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$1,146,878,931.00** | **$917,503,146.00** | **$229,375,785.00** |
| B-21-DF-22-0001 | **$407,873,287.00** | **$326,298,630.00** | **$81,574,657.00** |
| B-21-DZ-22-0001 | **$355,078,744.00** | **$284,062,996.00** | **$71,015,748.00** |
| B-22-DF-22-001 | **$383,926,900.00** | **$307,141,520.00** | **$76,785,380.00** |

## SOFT SECOND MORTGAGE PROGRAM

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $10,000,000.
  - Proposed HUD-identified MID budget: $8,000,000.
  - Proposed Grantee-identified MID budget: $2,000,000.

- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$25,000,000.00** | **$20,000,000.00** | **$5,000,000.00** |
| B-21-DF-22-0001 | **$ 10,000,000.00** | **$ 8,000,000.00** | **$ 2,000,000.00** |
| B-21-DZ-22-0001 | **$ 5,000,000.00** | **$ 4,000,000.00** | **$ 1,000,000.00** |
| B-22-DF-22-0001 | **$10,000,000.00** | **$8,000,000.00** | **$2,000,000.00** |

## FMA-SWIFT (NON-FEDERAL SHARE MATCH) PROGRAM

**The program was added with the additional $831.5 million allocation outlined in APA #3.**

APA # 3 was modified to include the below program details:

- **Program Description**
  - Investments in flood hazard risk mitigation activities in our MID areas helps to address repetitive losses for our disadvantaged LMI communities. These communities, when faced with repetitive loss, find it difficult to rebuild. 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 allocate funds to be used for individual flood mitigation projects that mitigate the risk of flooding to individual NFIP-insured structures that are SRL, RL, or are structures that have been deemed Substantially Damaged after August 26, 2021.
- **Program Tieback to Disaster/Unmet Needs**
  - This program addresses the unmet need for required non-federal match for all awarded FY22 FMA (Flood Mitigation Assistance) SWIFT current grants in the eligible MIDs.
- **How Program will Promote Housing for Vulnerable Populations**
  - The FMA Program aims to promote equity and delivery of these funds in line with the Justice 40 initiative. In implementing the Justice 40 initiative, the program is prioritizing assistance that benefits disadvantaged communities.
- **Program Definition of Second Home/Eligibility**
  - Not applicable

- **Program National Objective(s)**
  - Urgent Need Mitigation
  - LMI
- **Program Eligibility**
  - Eligible Activity - Non-federal share 105(a)(9)
- **Program Responsible Entity**
  - State of Louisiana or its sub-recipient(s)
- **Program Maximum Assistance**
  - The maximum award is $1,000,000.00
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be January 1, 2023 – 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
    - Tribal governments
- **Program Competitive Application Overview (if applicable)**
  - Eligible FY 22 FMA Swift Current projects with local cost-share requirements selected with a Notice of Funding Opportunity and approved by the Department of Homeland Security (DHS) will be funded with this program.
- **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. The state will develop a prioritization or proration methodology for disbursing funds to state agencies, local governments, and local nonprofit organizations. The state may prioritize activity type and/or create a funding threshold.
- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
  - Reducing the risk of future flooding damage to existing buildings.

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

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$3,000,000.00** | **$3,000,000.00** | **$0.00** |
| B-22-DF-22-0001 | **$3,000,000.00** | **$3,000,000.00** | **$0.00** |

## HOUSING BUYOUTS PROGRAM

**The program was added with the additional $831.5 million allocation outlined in APA #3.**

APA # 3 was modified to include the below program details:

- **Program Description**
  - The state will conduct large-area buyouts of repetitive loss properties (on the block or neighborhood scale) for families within repetitive loss areas, areas subject to moderate or high flood risk and/or within FEMA designated floodways. The MIT-Buyout Program is currently oversubscribed, and the state wishes to provide additional flood mitigation from future events in these FEMA designated floodway areas in the affected parishes. Repetitive Loss Properties that are acquired through program buyouts will be restored to natural floodplain conditions.
- **Program Tieback to Disaster/Unmet Needs**
  - Louisiana is facing increased risk, in both magnitude and frequency, of flood events which is an identified hazard in the Mitigation Needs Assessment.
- **How Program will Promote Housing for Vulnerable Populations**
  - The program would target benefits to vulnerable communities that experience repetitive loss and are subject to the potential large-scale relocation via buyout. This program will eliminate this risk by buying out these properties and allowing residents to relocate out of the floodway.
- **Program Affordability Period (if applicable)**
  - Not applicable

- **Program National Objective(s)**
  - Benefit to low- and moderate-income persons or households
  - Urgent Need Mitigation
- **Program Eligibility**
  - Eligible Activity – HCDA Sec. 105(a) (1), 105(a) (4), 105(a) (7), 105(a) (11).
- **Program Responsible Entity**
  - State of Louisiana or its sub-recipient(s)
- **Program Maximum Assistance**
  - The maximum award is $25,000,000.00.
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be July 1, 2023 – 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
    - Tribal governments
- **Program Competitive Application Overview (if applicable)**
  - Buyout program awards will be administered in a manner that prioritizes benefit to low- and moderate- income households that produce measurable reductions in residents' exposure to flood risk.
- **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 voluntary buyouts. The state will offer and conduct large-area voluntary buyouts as an allowable mitigation activity (on the block or neighborhood scale) for residents who own property located in repetitive loss areas, areas within FEMA designated floodways, and/or areas subject to moderate or high flood risk. Such buyout programs will include provisions for community-oriented assistance to homeowners in order to facilitate a successful transition to a location of lower flood risk outside of SFHAs.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
  - This program will promote storm water management by restoring the properties to their natural floodplain conditions to enhance the storage and ecosystem capacity of the land.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**
  - Louisiana is facing increased risk, in both magnitude and frequency, of flood events. This risk threatens the residents who live in the FEMA designated floodways. The program would target benefits to vulnerable communities that experience repetitive loss and are subject to the potential large-scale relocation via buyout. This program will eliminate this risk by buying out these properties and allowing residents to relocate out of the floodway.

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$100,000,000.00** | **$80,000,000.00** | **$20,000,000.00** |
| B-22-DF-22-0001 | **$100,000,000.00** | **$80,000,000.00** | **$20,000,000.00** |

## HOMETOWN REVITALIZATION PROGRAM

- The **Program Maximum Assistance** section was modified to read: The maximum award amount is $70 million.
  - **Previous text:** The maximum award amount is $25 million.
  - APA # 3 changes the maximum award amount to $70 million.
- The **Program Method of Distribution Description/Overview (if applicable)** section was modified to read: OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.

  OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $165 million for Ida and the May 2021 Severe Storms.

  OCD established a minimum of $600,000 and a maximum of $25 million for Laura/Delta; with a minimum of $300,000 for Ida and the May 2021 Severe Storms. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.

  Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million for Laura/Delta.

For the entitlement city that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.

If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.

- **Previous text**: OCD will distribute the funds as determined by the following methodology:
- OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.
- OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $75 million for Ida and the May 2021 Severe Storms.
- OCD established a minimum of $600,000 and a maximum of $25 million. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
- Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million.
- For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.
- If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.
- APA #3 updates the Program Method of Distribution section to reflect the changes to the program budget.

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $90,000,000.
  - Proposed HUD-identified MID budget: $72,000,000.
  - Proposed Grantee-identified MID budget: $18,000,000.

- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$215,000,000.00** | **$197,000,000.00** | **$18,000,000.00** |
| B-21-DF-22-0001 | **$75,000,000.00** | **$75,000,000.00** | **$0.00** |
| B-21-DZ-22-0001 | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| B-22-DF-22-0001 | **$90,000,000.00** | **$72,000,000.00** | **$18,000,000.00** |

## RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

- The **Program Description** section was modified to read: This program will enable some of the most damaged areas to address remaining infrastructure unmet needs and provide funding for local governments to develop large-scale mitigation activities that allow Louisiana communities to better withstand future disasters. Projects will demonstrably increase community resilience by reducing the hazard risks identified in the Mitigation Needs Assessment portion of this Action Plan.
    - **Previous text**: While the FEMA programs aim to cover a majority of the public infrastructure repairs, the State of Louisiana knows, based on experience, the reality is that there are unmet needs beyond the immediate threat to life and direct repair to damaged facilities, which is targeted in the PA Program.
    - The infrastructure loss, including; but not limited to, the loss to economic activity, property damage to residences, businesses and to the agriculture industry, far exceed the immediate remediation needs of the impacted communities. These unmet needs can only be addressed with long term planning and implementation of projects to address these problems. This program will enable some of the most damaged areas to address remaining infrastructure unmet needs.
    - APA # 3 updates the Program Description section to reflect program intention related to community resilience and mitigation.
- The **How the Program Will Advance Long-Term Resilience** section was modified to read: This program will require projects to meet the definition of mitigation. Mitigation activities are defined as those 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 disasters.
- Mitigation activities under this program are any action taken to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on Federal funding in future disasters.

- **Previous text**: 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.

- APA # 3 changes the section to define mitigation activities as it relates to program requirements.

- The **Program National Objective** section was modified to read:

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

  - **Previous text:** Benefit to low-and moderate-income persons;
    Aid in the prevention or elimination of slums or blight.
  - APA #3 adds the urgent need – mitigation to the national objective.

- The **Program Maximum Assistance** section was modified to read: The maximum award amount is $70 million.

  - **Previous text**: The maximum award amount is $25 million.
  - APA # 3 changes the maximum award amount to $70 million.

- The **Program Method of Distribution Description/Overview (if applicable)** section was modified to read: OCD will distribute the funds as determined by the following methodology:

  OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $200 million for Ida and the May 2021 Severe Storms.

  OCD established a minimum of $600,000 and a maximum of $25 million for Laura/Delta; with a minimum of $300,000 for Ida and the May 2021 Severe Storms. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.

  Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million for Laura/Delta.

  For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.

If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.

- **Previous text:** OCD will distribute the funds as determined by the following methodology:
- OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.
- OCD applied the percent of total damages to overall program budget of $50 million for each grant.
- OCD established a minimum of $600,000 and a maximum of $25 million. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
- Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million.
- For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.
- If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.
- APA #3 updates the Program Method of Distribution section to reflect the changes to the program budget.

- The **Proposed Budget** was modified to include the new allocation amount (B-22-DF-22-001):
  - Proposed budget: $150,000,000.
  - Proposed HUD-identified MID budget: $120,000,000.
  - Proposed Grantee-identified MID budget: $30,000,000.
- New program totals in APA #3:

| GRANT NUMBER | PROPOSED BUDGET | PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED | PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED |
|---|---|---|---|
| P-21-LA-22-LDZ1 | **$250,000,000.00** | **$220,000,000.00** | **$30,000,000.00** |
| B-21-DF-22-0001 | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| B-21-DZ-22-0001 | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| B-22-DF-22-0001 | **$150,000,000.00** | **$120,000,000.00** | **$30,000,000.00** |

## LOCAL AND REGIONAL WATERSHED PROJECTS AND PROGRAMS

**The program was added with the additional $831.5 million allocation outlined in APA #3.**

APA # 3 was modified to include the below program details:

- **Program Description**
  - The Louisiana Watershed Initiative serves as the state's multi-pronged approach to mitigating future flood risk and expanding resilient development patterns while focusing on natural boundaries. The nine watershed districts have created regional steering committees, representative of the demographics, parishes, and local jurisdictions within each watershed to ensure inclusivity, including members of protected classes, vulnerable populations, and underserved communities, at all levels of decision making.
  - The state will create a program for local and regional organizations to implement identified projects with demonstrable and quantifiable mitigation outcomes with the eligible MIDs within the state's watershed 8 and the HUD MID parishes of Jefferson, Orleans, Plaquemines, St. Mary and Terrebonne.
- **Program Tieback to Disaster/Unmet Needs**
  - This program addresses the unmet needs for mitigation measures to prevent damage from future disasters presented in the mitigation unmet needs section of this Action Plan, further helping communities to increase resilience within the areas located in eligible MIDs impacted by the disaster.
- **How Program will Advance Long-Term Resilience**
  - The projects will meet the definition of mitigation to be considered eligible in order to advance long-term resilience.
  - Mitigation activities are defined as those 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 disasters.
  - Mitigation activities under this program are any action taken to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on Federal funding in future disasters.
- **How Program will 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.

- **Program National Objective(s)**
  - Benefit to low- and moderate-income persons or households
  - Urgent Need Mitigation
  - For activities that use Urgent Need Mitigation as their national objective, the state will require sub-grantees to demonstrate how their projects will result in a measurable and verifiable reduction in the risk of loss of life and property.
- **Program Eligibility**
  - 105(a) 1-5, 7-9, 11-12, 16
- **Program Responsible Entity**
  - Units of general local government (UGLG), and/or local and regional coalitions.
- **Program Maximum Assistance**
  - The maximum award amount is $20,000,000.
- **Program Estimated Begin and End Dates**
  - The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance. April 1, 2023 - July 31, 2028
- **Program Method of Distribution Description/Overview (if applicable)**
  - OCD, in coordination with state agency staff representing the LWI Council agencies, will evaluate pre-applications for CDBG-DR basic threshold eligibility, ensuring no disqualifying factors for the proposed project. Criteria may include, but is not limited to, demonstration of best flood-risk mitigation practices, impacts positively benefitting the natural functions of a watershed, and benefits to vulnerable populations, including low and moderate-income populations and disadvantaged communities.
  - Disqualifying factors include, but are not limited to:
    - Applicant is not an eligible entity
    - Proposed project is not an eligible activity
    - Proposed project does not mitigate flood risk
    - Proposed project has potential to increase flooding in surrounding areas
    - Proposed project does not demonstrate risk mitigation benefits for an LMI, MID and Disadvantaged Community area

- Eligible pre-applications will be reviewed by the Region Steering Committee (RSC).
- Supported by the state agency project technical advisory group (TAG), RSC will select a set number of projects to move forward for the phase 1 feasibility study and the submission of a full project application.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
  - This program will fund projects with demonstrable and quantifiable flood mitigation outcomes thus increasing resilience to disasters and reducing or eliminating 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 disasters.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**
  - The project funding will address flood risks that have been documented as current and future risks.

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | P-21-LA-22-LDZ1 | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |
| Child | B-22-DF-22-0001 | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |

# AMENDMENTS

## SUBSTANTIAL AMENDMENT 3: 7/13/2023

The Action Plan Substantial Amendment No. 3 establishes new programs revises existing budgets and narratives and updates language throughout to incorporate the additional $831.5 million allocation for Hurricane Ida and the May 2021 Severe Storms.

- Budgets modifications were made to the **Unmet Need and Proposed Allocation – 2020 and 2021** tables.
- Language was modified in the **Mitigation Only Activities** section of the narrative.
- Language was modified in the **Program Budget Overview** section of the narrative.
- Budget modifications were made to the **Program Budget – 2020 and 2021** tables.
- Budget modifications were made to the **Interim Housing Assistance Program**.
- Budget modifications were made to the **Permanent Supportive Housing Program (PSHP)**.
- Budget modifications were made to the **Rapid Rehousing Program**.
- Budget modifications were made to the **Resilient Mixed Income Gap Funding Program (PRIME)**.
- Budget modifications were made to the **Soft Second Mortgage Program**.
- A new program was created, the **FMA-SWIFT (Non-Federal Share Match) Program**.
- A new program was created, the **Housing Buyouts Program**.
- Language was modified for the **Hometown Revitalization Program** Program Maximum Assistance and Program Method of Distribution Description/Overview sections. The budget was modified.
- Language was modified for the **Resilient Communities Infrastructure Program** Program Description, How the Program Will Advance Long-Term Resilience, Program National Objective, Program Maximum Assistance and Program Method of Distribution Description/Overview sections. The budget was modified.
- A new program was created, the **Local and Regional Watershed Projects and Programs.**

## SUBSTANTIAL AMENDMENT 2: 12/22/2022

The Action Plan Substantial Amendment No. 2 revises program narratives, changes the maximum award amounts, and updates language throughout the respective sections describing the allocation methodology for program budgets.

- Language was modified for the **Middle-Market Loan Program** Program Responsible Entity and Program Maximum Assistance section.
- Language was modified for the **Resilient Mixed Income GAP Funding Program** Program Maximum Assistance section.
- Language was modified for the **HMGP Global Match Program** Program Maximum Assistance section.
- Language was modified for the **Non-Federal Share Program** Program Maximum Assistance section.
- Language was modified for the **Restore Louisiana Homeowner Assistance Program** Program Maximum Assistance section.
- Language was modified for the **Resilient Communities Infrastructure Program** Program Description, Program Tieback to Disaster/Unmet Needs, Program Maximum Assistance and the Program Method of Distribution Description/Overview sections.
- Language was modified for the **Hometown Revitalization Program** Description, Program Maximum Assistance and the Program Method of Distribution Description/Overview sections.
- Program name was modified for the **Rental Restoration and Development Program**, previously the Neighborhood Landlord Rental Program, throughout the document.

## SUBSTANTIAL AMENDMENT 1: 09/20/2022

- Abstract revised to include language around Substantial Amendment No. 1
- Executive Summary revised to include details and overview descriptions for Hurricane Ida and the May 2021 Severe Storms; revisions include language as well as images
- **Unmet Need and Proposed Allocations** table, updated to include Hurricane Ida and May 2021 Severe Storms
- **Unmet Needs Assessment** revised to include HUD- and state-identified MID areas for Hurricane Ida and the May 2021 Severe Storms and to include new demographic information for impacted areas; homeowner data updated to include Hurricane Ida and the May 2021 Severe Storms

- All **FEMA data tables** updated to include numbers for Hurricane Ida and the May 2021 Severe Storms All **data tables** updated to include numbers for Hurricane Ida and the May 2021 Severe Storms
- All **data tables** updated to include numbers for Hurricane Ida and the May 2021 Severe Storms
- **Housing Unmet Need** section revised to include data and narrative for homeowners affected by Hurricane Ida and the May 2021 Severe Storms
- **Infrastructure Unmet Need** section revised to include data and narrative for Hurricane Ida and the May 2021 Severe Storms **Economic Revitalization Unmet Need** section revised to include data and narrative for Hurricane Ida and the May 2021 Severe Storms
- **General Requirements** was revised to include Louisiana tribes impacted by Hurricane Ida and the May 2021 Severe Storms and to update the list of public hearings around Hurricane Ida and the May 2021 Severe Storms
- **Program Budget** section updated to include new data for Hurricane Ida and the May 2021 Severe Storms
- **Appendix** section updated to include new data for Hurricane Ida and the May 2021 Severe Storms
- **Programs updated** to include new budget amounts along with 2 additional programs added under Economic Development and Infrastructure.

### INITIAL: 07/13/2022

Resubmittal of the May 6, 2022 Master Action Plan for Laura and Delta.

LOUISIANA Office of COMMUNITY DEVELOPMENT

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# 1. EXECUTIVE SUMMARY

## OVERVIEW

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

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

### SUBSTANTIAL AMENDMENT NO. 1

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).

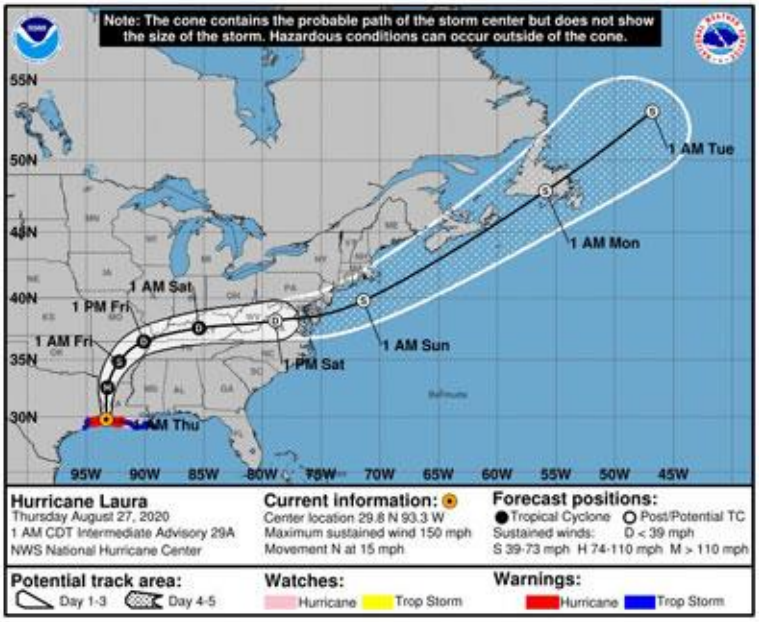
# DISASTER SPECIFIC OVERVIEW

## 2020 STORMS

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

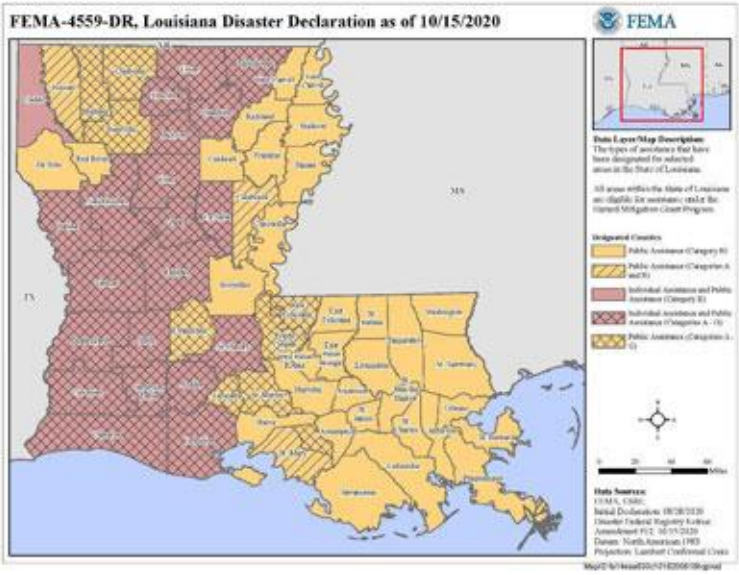
### *Hurricane Laura (DR-4559)*

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




*Source: https://www.nhc.noaa.gov/archive/2020/LAURA_graphics.php?product=5day_cone_with_line*

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




*Source: [https://gis.fema.gov/maps/dec_4559.pdf](https://gis.fema.gov/maps/dec_4559.pdf)*

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

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

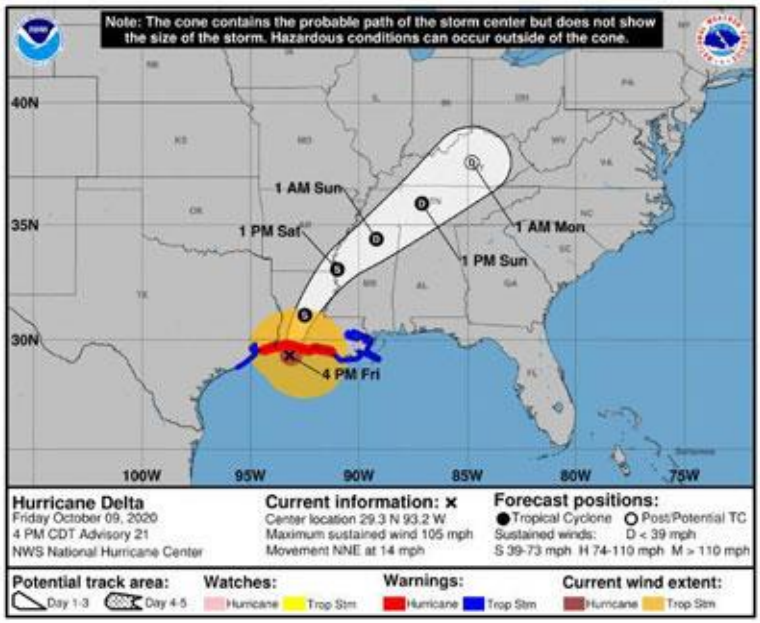
Congregate shelters for survivors are not utilized for long-term sheltering in order to mitigate the spread of COVID-19. To provide non-congregate sheltering in the COVID-19 environment, the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) immediately contracted with hotels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

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

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

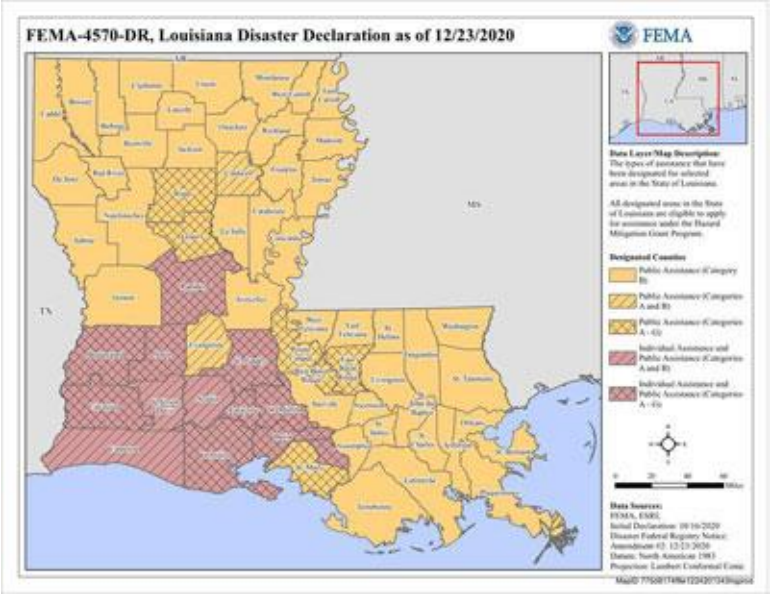
### *Hurricane Delta (DR-4570)*

Hurricane Delta made landfall approximately six weeks after, and just 13 miles, from where Hurricane Laura struck and followed a similar path, devastating many of the same communities again. Hurricane Delta made landfall in Louisiana on Friday, October 9, 2020, as a strong Category 2 hurricane. Outer bands from Hurricane Delta began impacting Louisiana almost 24 hours before landfall, bringing significant amounts of rainfall during the evening of October 8, 2020. When Hurricane Delta struck Louisiana, it brought high storm surge, heavy rain, and damaging winds. Parts of Calcasieu Parish had already received 16-17 inches of rain by the time Hurricane Delta made landfall. According to the Louisiana Department of Health, Hurricane Delta led to a total of six storm-related deaths.




*Source: https://www.nhc.noaa.gov/archive/2020/DELTA_graphics.php?product=5day_cone_no_line*

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




*Source: https://gis.fema.gov/maps/dec_4570.pdf*

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

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

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

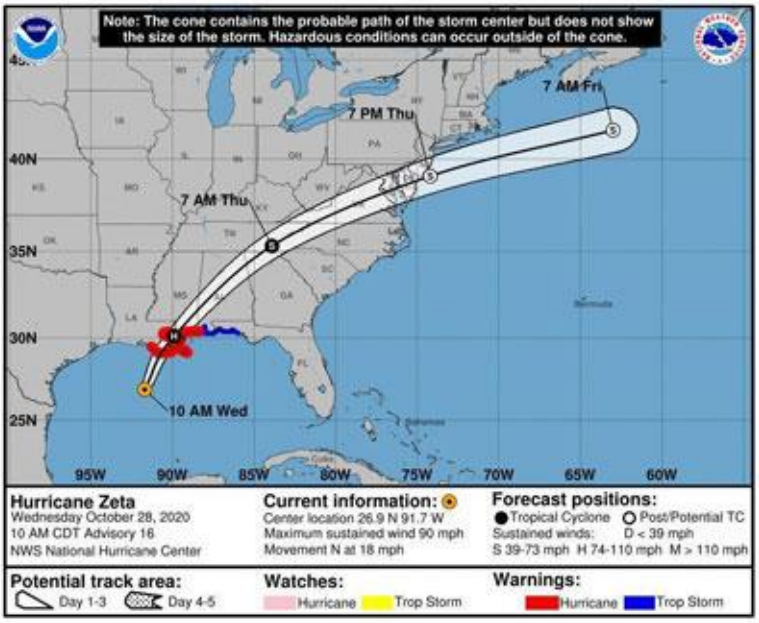
The immediate mass exodus of the population seen from Hurricane Laura with the potential for significant impacts to the population and workforce was exacerbated by the continued devastation of Hurricane Delta. Thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane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

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

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

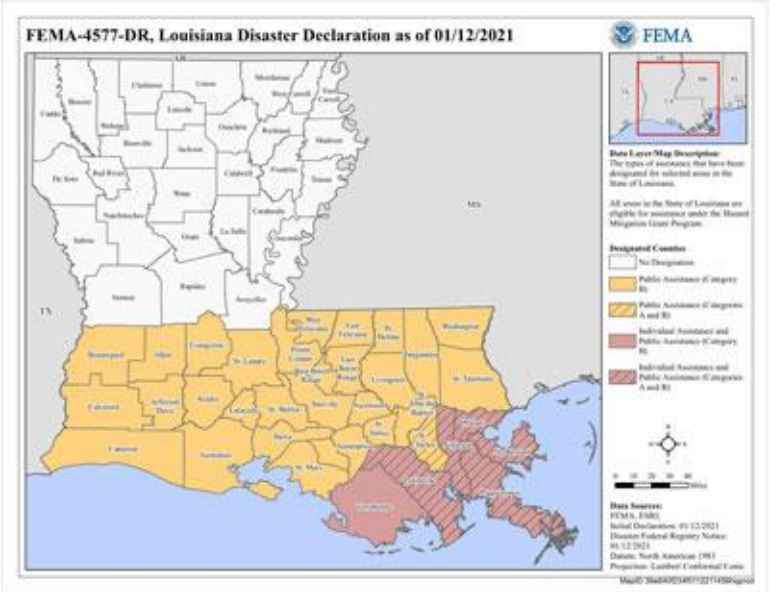
### *Hurricane Zeta (DR-4577)*

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




*Source: https://www.nhc.noaa.gov/archive/2020/ZETA_graphics.php?product=5day_cone_with_line*

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




*Source: https://www.fema.gov/disaster/4577*

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

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

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

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

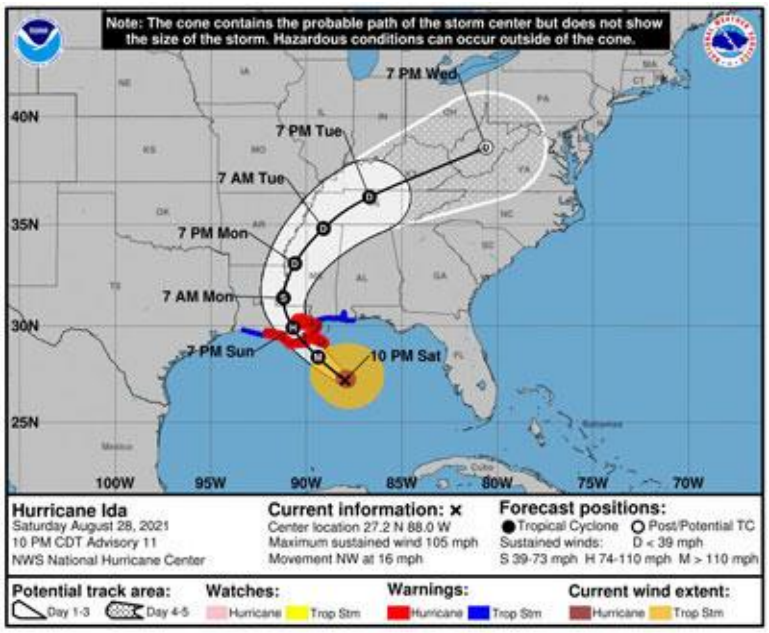
As thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane impacts, Louisiana faced damages that now extended across the state. After Hurricane Zeta, even more communities face the risk of being overcome by blight. Further, the demand for both permanent and temporary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

## 2021 STORMS

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

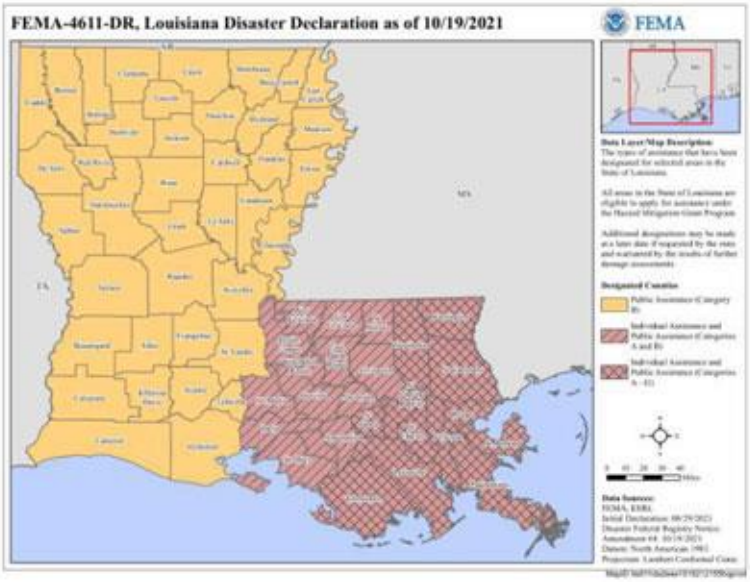
### *Hurricane Ida (DR-4611)*

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




*Source: https://www.nhc.noaa.gov/archive/2021/IDA_graphics.php?product=5day_cone_with_line*

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](https://www.fema.gov/disaster/4611)*

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

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

LOUISIANA Office of COMMUNITY DEVELOPMENT

## SUBSTANTIAL AMENDMENT NO. 1

# DISASTER SPECIFIC OVERVIEW

### 2021 STORMS

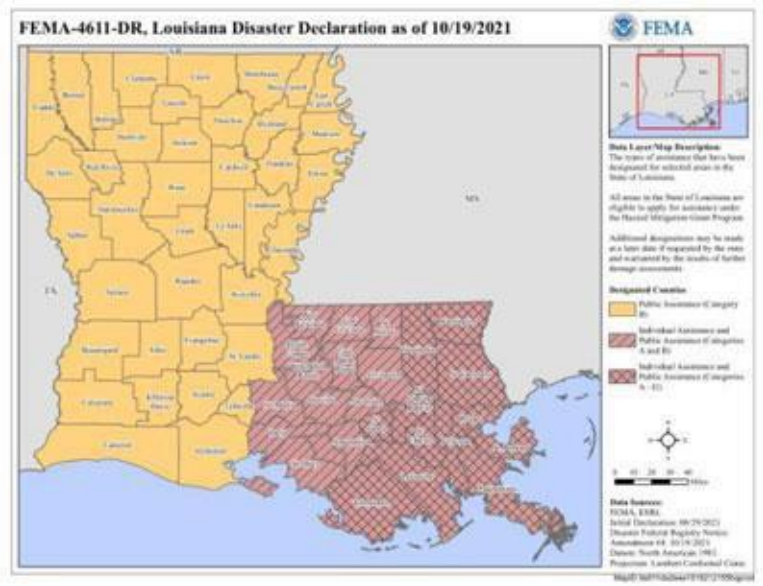
Louisiana was impacted by three major disasters in 2021 – Severe Winter Storms (DR 4590); May 2021 Severe Storms (DR 4606); and Hurricane Ida (DR 4611). Combined these storms resulted in 49 of Louisiana's 64 parishes receiving a disaster declaration for FEMA IA.

#### *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](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](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.

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[1] *Outdated Federal Flood Standards Put People at Risk | NRDC*

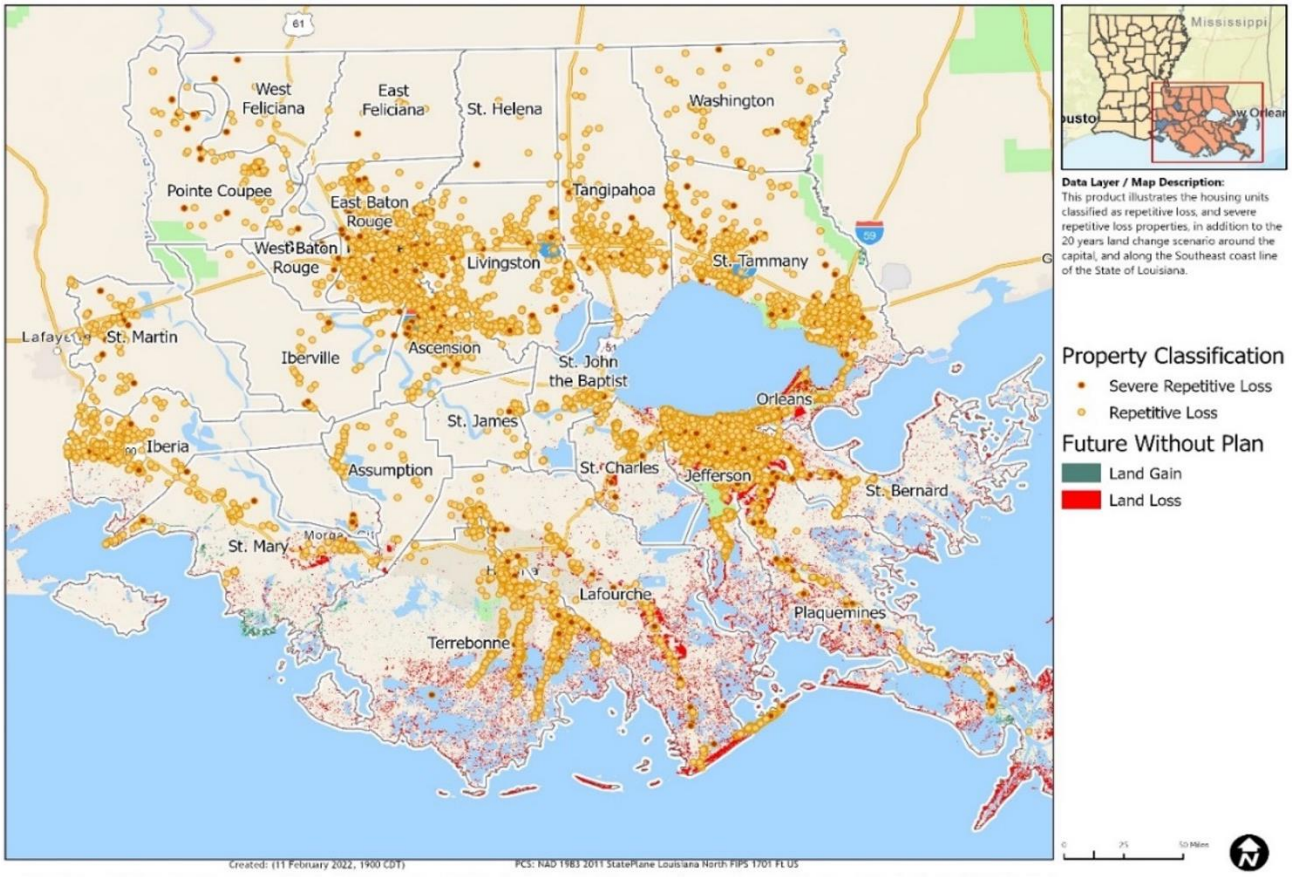
[2] *2022 Sea Level Rise Technical Report (noaa.gov)*

[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. From Hurricanes Laura, Delta, Zeta, and Ida, 100,778 homeowners sustained wind damage, an estimated 75 percent without homeowners' insurance.

The state immediately began citizen engagement efforts following the 2020 disasters to gather data regarding impacts and unmet needs, beginning with local officials and personnel in the impacted communities. Citizen engagement efforts remain ongoing through the public comment period to inform program design and keep a pulse on the outstanding unmet needs of Louisiana residents. The Louisiana

Office of Community Development - Disaster Recovery Unit will lead a series of public meetings across the state, with in-person meetings held in the most impacted parishes. The state is taking measures to ensure all public hearings are recorded and made available to the public after each meeting. The state has also worked closely with local leaders and stakeholders to ensure Louisiana residents were made aware of this funding allocation and the opportunity to present feedback. Citizen engagement efforts include but are not limited to public hearings, social media outreach, earned media engagement, traditional marketing around the availability of the draft action plan for public review, and additional targeted outreach in the 15 FEMA-declared MID areas from Hurricanes Laura and Delta.

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

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

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

While the state is cognizant an award large enough to cover all unmet needs is not reasonable to expect as a result of these disasters, it does believe this unmet need total illustrates the unique nature of these disasters relative to those from which it has coordinated past long-term recovery activities. Specifically,

Hurricane Laura's, Delta's, Zeta's and Ida's powerful winds cut across a swath of rural Louisiana, that while lacking in dense population centers provides essential drivers to Louisiana's economy – specifically in the agriculture and timber industries, for which this disaster was as catastrophic as any in the state's history. Still, given the intent of the CDBG program, the state will – as it has in the past – first prioritize housing recovery activities in effectuating its long-term recovery efforts.

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

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

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

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

## PROPOSED ALLOCATION AMOUNTS

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

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

## SUBSTANTIAL AMENDMENT NO. 1

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;
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- 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.

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

## PROPOSED ALLOCATION AMOUNTS

### 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 | $0.00 | 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 | $0.00 | 0.0% | $0.00 | 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.*

# UNMET NEED AND PROPOSED ALLOCATION - 2020

| CATEGORY | REMAINING UNMET NEED | % OF UNMET NEED | PROGRAM ALLOCATION AMOUNT | % OF PROGRAM ALLOCATION |
|---|---|---|---|---|
| Administration | $8,100,000.00 | 0.38% | $41,900,000.00 | 3.99% |
| Planning | $0.00 | 0.00% | $1,100,000.00 | 0.10% |
| Housing | $0.00 | 0.00% | $721,578,744.00 | 68.70% |
| Infrastructure | $230,980,913.00 | 10.71% | $185,232,774.00 | 17.64% |
| Economic Revitalization | $1,917,431,862.00 | 88.91% | $100,455,482.00 | 9.56% |
| Public Services | $0.00 | 0.00% | $0.00 | 0.00% |
| Mitigation | $0.00 | 0.00% | $0.00 | 0.00% |
| **Total** | **$2,156,512,775.00** | **100.00%** | **$1,050,267,000.00** | **100.00%** |

*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.*

LOUISIANA Office of COMMUNITY DEVELOPMENT

# UNMET NEED AND PROPOSED ALLOCATION - 2021

| CATEGORY | REMAINING UNMET NEED | % OF UNMET NEED | PROGRAM ALLOCATION AMOUNT | % OF PROGRAM ALLOCATION |
|---|---|---|---|---|
| Administration | $49,106,160.00 | 1.44% | $91,468,940.00 | 4.35% |
| Planning | $0.00 | 0.00% | $2,000,000.00 | 0.10% |
| Housing | $550,279,191.00 | 16.15% | $1,396,800,187.00 | 66.39% |
| Infrastructure | $184,530,483.00 | 5.41% | $402,883,641.00 | 19.15% |
| Economic Revitalization | $2,624,304,768.00 | 77.00% | $210,695,232.00 | 10.01% |
| Public Services | $0.00 | 0.00% | $0.00 | 0.00% |
| Mitigation | $0.00 | 0.00% | $0.00 | 0.00% |
| **Total** | **$3,408,220,602.00** | **100.00%** | **$2,103,848,000.00** | **100.00%** |

*Data Source(s): OCD*

# 2. UNMET NEEDS ASSESSMENT

## OVERVIEW

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

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

### GRANTEE-IDENTIFIED MID AREAS

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

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

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

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

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

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

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

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

- The median owner-occupied housing unit value for the 15 most impacted and distressed areas is $124,850, which is $38,250 and 23 percent lower than statewide.
- The median owner-occupied housing unit value for the 15 most impacted and distressed areas is $118,650, which is $44,450 and 27 percent lower than statewide.
- The 15 most impacted and distressed parishes also have a similar proportion of renters to owners as both the state and the other IA parishes.

- At 31 percent, the 15 most impacted and distressed parishes collectively are home to a renter population that is almost 6 percentage points lower than the other IA parishes (37 percent) and more than 2 percentage points higher than the statewide total (29 percent).

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

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

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

## IMPACTS OF INSURANCE (HOI AND NFIP)

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

## HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

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

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

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

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

## SUBSTANTIAL AMENDMENT NO. 1

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: 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).

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).

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 2,699,273[6], 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.

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.

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

## 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).

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## HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

| | | AGE, PERCENT | | |
|---|---|---|---|---|
| LOCATION | POPULATION | UNDER 18 | 60+ | FAMILY SIZE |
| 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 |
| 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).[2]

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 income[3] 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 $17,430[4] 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 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,[5] 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).[6]

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 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 | | | RACE | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | MEDIAN | MEAN | NO HS GRA | BACHELORS OR HIGHER | DISABILITY, ALL AGES | WHITE | BLACK OR AFRICAN AMERICAN | AMERICAN INDIAN AND ALASKA NATIVE | OTHER | HISPANIC OR LATINO | LIMITED ENGLISH PROFICIENCY (LEP) |
| 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% |

| LOCATION | HOUSEHOLD INCOME (2019) | | EDUCATION | | | RACE | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | MEDIAN | MEAN | NO HS GRA | BACHELORS OR HIGHER | DISABILITY, ALL AGES | WHITE | BLACK OR AFRICAN AMERICAN | AMERICAN INDIAN AND ALASKA NATIVE | OTHER | HISPANIC OR LATINO | LIMITED ENGLISH PROFICIENCY (LEP) |
| 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% |

*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).

| DAMAGE TYPE | IDA AND 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 2020 storms: 40,388
- 19,117 homeowners
- 6,303 major-severe / 12,814 minor
- 11,893 LMI / 7,224 non-LMI
- 21,271 renters
- 7,857 major-severe / 13,414 minor
- 15,486 LMI / 5,785 non-LMI

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

## STATEWIDE HOUSING DAMAGE AND LOSS ASSESSMENT

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

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

### *Population, Poverty and Potentially Vulnerable Groups*

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

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

| | PRE-DISASTER | | POST DISASTER OWNER DATA | | | | POST DISASTER RENTER DATA | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| PARISH | TOTAL POPULATION | % PEOPLE BELOW POVERTY LEVEL | POPULATION 60+ | OWNER REGISTRANTS | OWNER HH WITH MEMBER 60+ | OWNER WITH AFN MEMBER | RENTER REGISTRANTS | HH WITH MEMBER 60+ | RENTER HH WITH AFN MEMBERSH | TENURE BLANK |
| Acadia | 62,045 | 23.9% | 20.0% | 3,563 | 1,168 | 486 | 2,214 | 237 | 242 | 6 |
| Allen | 25,627 | 18.7% | 19.6% | 4,134 | 1,639 | 753 | 1,857 | 298 | 233 | 12 |
| Beauregard | 37,497 | 17.2% | 21.2% | 8,317 | 3,233 | 1,478 | 2,785 | 438 | 395 | 19 |
| Caddo | 240,204 | 23.3% | 22.4% | 926 | 297 | 146 | 1,789 | 106 | 180 | 1 |
| Calcasieu | 203,436 | 16.9% | 20.3% | 57,100 | 23,179 | 8,525 | 55,952 | 7,594 | 5,268 | 178 |
| Cameron | 6,973 | 10.3% | 25.1% | 3,303 | 1,240 | 393 | 1,508 | 190 | 98 | 12 |
| Grant | 22,389 | 19.7% | 20.0% | 2,536 | 1,037 | 475 | 667 | 100 | 100 | 3 |
| Jackson | 15,744 | 26.0% | 25.7% | 950 | 385 | 150 | 483 | 49 | 47 | 3 |
| Jefferson Davis | 31,368 | 19.4% | 22.5% | 5,724 | 2,113 | 862 | 2,798 | 439 | 348 | 9 |
| La Salle | 14,892 | 22.0% | 23.5% | 1,152 | 463 | 86 | 273 | 34 | 19 | 0 |
| Lincoln | 46,742 | 29.7% | 17.8% | 1,244 | 449 | 146 | 1,141 | 97 | 111 | 0 |
| Morehouse | 24,874 | 28.5% | 24.2% | 614 | 263 | 96 | 389 | 35 | 37 | 1 |
| Natchitoches | 38,158 | 33.5% | 21.3% | 2,773 | 1,083 | 430 | 1,833 | 225 | 222 | 6 |
| Ouachita | 153,279 | 23.9% | 20.2% | 4,372 | 1,643 | 652 | 4,185 | 448 | 498 | 4 |
| Rapides | 129,648 | 19.4% | 21.5% | 9,353 | 3,612 | 1,614 | 30,738 | 1,294 | 1,070 | 18 |
| Sabine | 23,884 | 19.5% | 26.6% | 2,232 | 870 | 407 | 646 | 79 | 84 | 4 |
| St. Landry | 82,124 | 28.7% | 21.7% | 1,058 | 316 | 201 | 1,118 | 92 | 113 | 4 |
| Union | 22,108 | 18.5% | 27.4% | 1,381 | 570 | 245 | 393 | 53 | 39 | 0 |
| Vermilion | 59,511 | 17.6% | 20.3% | 2,793 | 909 | 397 | 1,115 | 120 | 135 | 6 |
| Vernon | 47,429 | 17.2% | 15.7% | 5,603 | 2,133 | 1,090 | 4,139 | 427 | 481 | 7 |
| Winn | 13,904 | 23.8% | 23.8% | 1,439 | 644 | 261 | 619 | 104 | 97 | 2 |

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

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

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

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

The state compiled information to document damages across several different population stratifications, including owner-occupied and renter households, households with flood damage without flood insurance, households with wind damage without hazard insurance, households within the 15 most impacted and distressed areas, and low- and moderate-income (LMI) households. For the purposes of this analysis, the state used full applicant-level data collected through FEMA's IA program. Datasets for Laura and Delta are as of April 2021. Unless otherwise noted, all housing summary data were compiled from these datasets.

For rental properties, to meet the statutory requirement of “most impacted and distressed,” homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA personal property damage assessment of $2,000 or greater or flooding over one foot for rental households.

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

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

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

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

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

The average cost for full home repair to code for a specific disaster within each of the damage categories noted above is calculated using the observed differences in real property damage costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA after Hurricanes Laura and Delta. Since SBA inspects for full repair costs, it presumes to reflect the full cost to repair the home, which is generally more than FEMA estimates on the cost to make the home habitable.

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

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

### FEMA/SBA MULTIPLIER – LAURA

| CATEGORY | COUNT | FVL | SBA | MULTIPLIER |
|---|---|---|---|---|
| Severe | 115 | $6,008,440 | $18,662,776 | 3.1 |
| Major-High | 86 | $1,841,903 | $14,580,286 | 7.9 |
| Major-Low | 867 | $11,257,017 | $98,674,106 | 8.8 |
| Minor-High | 895 | $5,656,689 | $66,321,795 | 11.7 |
| Minor-Low | 743 | $1,865,834 | $39,952,219 | 21.4 |
| **Totals** | **2,706** | **$ 26,629,883.00** | **$ 238,191,182.00** | |

### FEMA/SBA MULTIPLIER – DELTA

| CATEGORY | COUNT | FVL | SBA | MULTIPLIER |
|---|---|---|---|---|
| Severe | 7 | $259,621.00 | $718,149.00 | 2.8 |
| Major-High | 19 | $374,415.00 | $2,175,000.00 | 5.8 |
| Major-Low | 113 | $1,308,204.00 | $11,803,419.00 | 9.0 |
| Minor-High | 77 | $466,943.00 | $4,586,075.00 | 9.8 |
| Minor-Low | 124 | $288,283.00 | $6,512,059.00 | 22.6 |
| **Totals** | **340** | **$2,697,466.00** | **$25,794,702.00** | |

**Destroyed Properties**: The state highlights the below parishes, based on their high concentration of properties reported to be 'destroyed' in the disaster events. The table below illustrates how Calcasieu and Cameron parishes compare in destroyed homes against the remaining IA parishes in total. Of the 506 destroyed properties, the majority (93 percent) are home-owned properties.

### TABLE: DESTROYED PROPERTIES – LAURA, DELTA

| | LAURA | | DELTA | | TOTAL OVER ALL STORMS | |
|---|---|---|---|---|---|---|
| PARISH | COUNT | % OF TOTAL | COUNT | % OF TOTAL | COUNT | % OF TOTAL |
| Calcasieu | 208 | 45% | 12 | 30% | 220 | 43% |
| Cameron | 160 | 3% | 10 | 25% | 170 | 34% |
| Remaining IA Parishes | 98 | 21% | 18 | 45% | 116 | 23% |
| **Total** | **466** | | **40** | | **506** | |

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

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

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

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

# SUBSTANTIAL AMENDMENT NO. 1

## 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

- 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.
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- **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.
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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.

## SUBSTANTIAL AMENDMENT NO. 1

### AFFORDABLE HOUSING PROGRAM REQUIREMENTS

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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 LOSS |
|---|---|---|---|---|---|---|
| Acadia | 4,434.00 | 1,643.00 | 1,287.00 | 880.00 | $7,495,265.00 | $8,517.35 |
| Allen | 4,575.00 | 1,675.00 | 1,384.00 | 961.00 | $8,914,740.00 | $9,276.52 |
| Beauregard | 9,103.00 | 3,132.00 | 2,674.00 | 2,006.00 | $16,931,313.00 | $8,440.34 |
| Caddo | 1,440.00 | 579.00 | 422.00 | 283.00 | $2,954,913.00 | $10,441.39 |
| Calcasieu | 60,956.00 | 21,035.00 | 17,478.00 | 11,993.00 | $148,656,485.00 | $12,395.27 |
| Cameron | 3,449.00 | 1,731.00 | 1,458.00 | 1,020.00 | $27,887,729.00 | $27,340.91 |

LOUISIANA Office of COMMUNITY DEVELOPMENT

| COUNTY | # OF APPLICANTS | # OF INSPECTIONS | # INSPECTED WITH DAMAGE | # RECEIVED ASSISTANCE | TOTAL FEMA VERIFIED LOSS | AVERAGE FEMA VERIFIED LOSS |
|---|---|---|---|---|---|---|
| Grant | 2,594.00 | 712.00 | 597.00 | 430.00 | $4,392,473.00 | $10,215.05 |
| Iberia | 4,665.00 | 8,490.00 | 719.00 | 644.00 | $3,558,804.00 | $5,526.09 |
| Jackson | 945.00 | 172.00 | 117.00 | 90.00 | $871,453.00 | $9,682.81 |
| Jefferson Davis | 6,091.00 | 1,892.00 | 1,550.00 | 1,053.00 | $10,808,877.00 | $10,264.84 |
| La Salle | 1,166.00 | 118.00 | 83.00 | 57.00 | $422,475.00 | $7,411.84 |
| Lafayette | 2,978.00 | 1,066.00 | 883.00 | 650.00 | $3,999,885.00 | $6,153.67 |
| Lincoln | 1,291.00 | 259.00 | 189.00 | 115.00 | $1,332,804.00 | $11,589.60 |
| Morehouse | 713.00 | 266.00 | 221.00 | 162.00 | $1,515,782.00 | $9,356.68 |
| Natchitoches | 2,864.00 | 617.00 | 448.00 | 290.00 | $2,622,338.00 | $9,042.54 |
| Ouachita | 4,564.00 | 953.00 | 725.00 | 541.00 | $4,298,467.00 | $7,945.41 |
| Rapides | 10,571.00 | 2,762.00 | 2,160.00 | 1,514.00 | $14,376,109.00 | $9,495.45 |
| Sabine | 2,285.00 | 440.00 | 327.00 | 229.00 | $1,854,902.00 | $8,100.01 |
| St. Landry | 2,982.00 | 1,234.00 | 1,019.00 | 738.00 | $5,003,878.00 | $6,780.32 |
| St. Martin | 3,039.00 | 2,120.00 | 656.00 | 527.00 | $2,985,938.00 | $5,665.92 |
| Union | 1,428.00 | 272.00 | 203.00 | 156.00 | $987,965.00 | $6,333.11 |
| Vermilion | 3,418.00 | 1,358.00 | 1,110.00 | 815.00 | $6,227,582.00 | $7,641.20 |
| Vernon | 5,684.00 | 1,343.00 | 1,039.00 | 714.00 | $5,975,335.00 | $8,368.82 |
| Winn | 1,464.00 | 338.00 | 253.00 | 168.00 | $1,525,535.00 | $9,080.57 |
| Ascension | 18,568.00 | 5,762.00 | 2,094.00 | 2,251.00 | $15,218,879.33 | $6,760.94 |
| Asumption | 3,577.00 | 1,878.00 | 965.00 | 1,010.00 | $5,875,865.12 | $5,817.69 |
| East Baton Rouge | 36,746.00 | 14,058.00 | 2,769.00 | 3,111.00 | $17,661,607.38 | $5,677.15 |
| East Feliciana | 2,123.00 | 902.00 | 365.00 | 396.00 | $2,176,250.03 | $5,495.58 |
| Iberville | 3,213.00 | 1,889.00 | 579.00 | 641.00 | $3,888,309.58 | $6,066.01 |
| Jefferson | 88,420.00 | 24,324.00 | 11,163.00 | 11,798.00 | $119,816,095.84 | $10,155.63 |
| Lafourche | 25,348.00 | 11,305.00 | 7,142.00 | 7,299.00 | $116,946,062.44 | $16,022.20 |
| Livingston | 24,291.00 | 7,242.00 | 3,190.00 | 3,423.00 | $25,141,468.51 | $7,344.86 |
| Orleans | 57,824.00 | 18,794.00 | 9,457.00 | 10,122.00 | $62,375,506.13 | $6,162.37 |

| COUNTY | # OF APPLICANTS | # OF INSPECTIONS | # INSPECTED WITH DAMAGE | # RECEIVED ASSISTANCE | TOTAL FEMA VERIFIED LOSS | AVERAGE FEMA VERIFIED LOSS |
|---|---|---|---|---|---|---|
| Plaquemines | 5,245.00 | 2,299.00 | 1,576.00 | 1,667.00 | $12,915,841.80 | $7,747.96 |
| Point Coupee | 999.00 | 623.00 | 98.00 | 98.00 | $741,887.39 | $7,570.28 |
| St. Bernard | 8,896.00 | 2,840.00 | 1,519.00 | 1,613.00 | $8,295,266.28 | $5,142.76 |
| St. Charles | 14,441.00 | 4,627.00 | 2,393.00 | 2,475.00 | $35,895,985.76 | $14,503.43 |
| St. Helena | 3,232.00 | 1,800.00 | 1,187.00 | 1,278.00 | $7,202,082.44 | $5,635.43 |
| St. James | 5,297.00 | 2,565.00 | 1,395.00 | 1,424.00 | $16,217,748.03 | $11,388.87 |
| St. John the Baptist | 12,882.00 | 6,722.00 | 3,722.00 | 3,810.00 | $73,756,927.63 | $19,358.77 |
| St. Mary | 3,360.00 | 2,151.00 | 629.00 | 633.00 | $4,247,955.49 | $6,710.83 |
| St. Tammany | 46,301.00 | 10,915.00 | 3,995.00 | 4,384.00 | $30,284,299.09 | $6,907.91 |
| Tangipahoa | 29,198.00 | 12,137.00 | 6,658.00 | 6,935.00 | $55,849,248.87 | $8,053.24 |
| Terrebonne | 26,497.00 | 12,641.00 | 8,041.00 | 8,190.00 | $137,209,315.53 | $16,753.27 |
| Washington | 6,405.00 | 2,888.00 | 1,245.00 | 1,338.00 | $7,051,134.96 | $5,269.91 |
| West Baton Rouge | 1,652.00 | 964.00 | 136.00 | 136.00 | $942,910.99 | $6,933.17 |
| West Feliciana | 621.00 | 412.00 | 57.00 | 57.00 | $363,251.52 | $6,372.83 |
| **Total** | **567,835.00** | **203,945.00** | **107,377.00** | **100,125.00** | **$1,045,674,947.14** | **$422,916.80** |

*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 |
|---|---|---|---|---|---|---|
| Acadia | 2,734.00 | 1,200.00 | 835.00 | 464.00 | $1,282,444.00 | $2,763.89 |
| Allen | 2,092.00 | 917.00 | 465.00 | 378.00 | $780,781.00 | $2,065.56 |
| Beauregard | 3,071.00 | 1,568.00 | 763.00 | 739.00 | $1,197,422.00 | $1,620.33 |
| Caddo | 3,745.00 | 1,637.00 | 1,247.00 | 853.00 | $2,621,760.00 | $3,073.58 |
| Calcasieu | 490,336.00 | 393,527.00 | 24,965.00 | 21,134.00 | $50,317,066.00 | $2,380.86 |
| Cameron | 1,547.00 | 800.00 | 452.00 | 310.00 | $1,370,756.00 | $4,421.79 |

| COUNTY | # OF APPLICANTS | # OF INSPECTIONS | # INSPECTED WITH DAMAGE | # RECEIVED ASSISTANCE | TOTAL FEMA VERIFIED LOSS | AVERAGE FEMA VERIFIED AMOUNT |
|---|---|---|---|---|---|---|
| Grant | 702.00 | 224.00 | 113.00 | 83.00 | $245,720.00 | $2,960.48 |
| Iberia | 6,081.00 | 5,398.00 | 152.00 | 108.00 | $383,350.40 | $3,549.54 |
| Jackson | 441.00 | 98.00 | 42.00 | 25.00 | $73,263.00 | $2,930.52 |
| Jefferson Davis | 2,933.00 | 1,313.00 | 779.00 | 457.00 | $1,315,699.00 | $2,878.99 |
| La Salle | 284.00 | 51.00 | 19.00 | 13.00 | $32,031.00 | $2,463.92 |
| Lafayette | 2,419.00 | 913.00 | 739.00 | 482.00 | $1,142,154.00 | $2,369.61 |
| Lincoln | 1,188.00 | 258.00 | 136.00 | 74.00 | $205,964.00 | $2,783.30 |
| Morehouse | 602.00 | 196.00 | 138.00 | 96.00 | $290,341.00 | $3,024.39 |
| Natchitoches | 1,940.00 | 641.00 | 379.00 | 202.00 | $874,644.00 | $4,329.92 |
| Ouachita | 4,917.00 | 1,496.00 | 967.00 | 608.00 | $1,848,927.00 | $3,041.00 |
| Rapides | 33,409.00 | 4,293.00 | 2,590.00 | 1,192.00 | $5,399,205.00 | $4,529.53 |
| Sabine | 672.00 | 171.00 | 96.00 | 60.00 | $184,801.00 | $3,080.02 |
| St. Landry | 2,349.00 | 1,151.00 | 886.00 | 462.00 | $1,706,026.00 | $3,692.70 |
| St. Martin | 4,404.00 | 3,982.00 | 238.00 | 172.00 | $407,839.51 | $2,371.16 |
| Union | 438.00 | 111.00 | 70.00 | 40.00 | $194,539.00 | $4,863.48 |
| Vermilion | 1,302.00 | 521.00 | 322.00 | 194.00 | $528,984.00 | $2,726.72 |
| Vernon | 4,299.00 | 1,234.00 | 582.00 | 409.00 | $919,346.00 | $2,247.79 |
| Winn | 639.00 | 203.00 | 116.00 | 70.00 | $186,172.00 | $2,659.60 |
| Ascension | 10,691.00 | 7,713.00 | 1,626.00 | 2,294.00 | $2,059,621.41 | $897.83 |
| Assumption | 2,170.00 | 1,798.00 | 392.00 | 474.00 | $606,918.40 | $1,280.42 |
| East Baton Rouge | 56,375.00 | 34,471.00 | 5,800.00 | 9,972.00 | $8,478,585.36 | $850.24 |
| East Feliciana | 1,425.00 | 1,125.00 | 69.00 | 103.00 | $116,356.98 | $1,129.68 |
| Iberville | 3,650.00 | 3,028.00 | 179.00 | 208.00 | $656,469.27 | $3,156.10 |
| Jefferson | 79,101.00 | 56,810.00 | 31,247.00 | 40,180.00 | $40,432,764.49 | $1,006.29 |
| Lafourche | 10,892.00 | 8,942.00 | 5,016.00 | 5,690.00 | $10,499,391.69 | $1,845.24 |
| Livingston | 11,179.00 | 7,091.00 | 1,597.00 | 2,387.00 | $1,886,566.74 | $790.35 |
| Orleans | 96,852.00 | 68,719.00 | 36,823.00 | 48,344.00 | $41,224,851.55 | $852.74 |

| COUNTY | # OF APPLICANTS | # OF INSPECTIONS | # INSPECTED WITH DAMAGE | # RECEIVED ASSISTANCE | TOTAL FEMA VERIFIED LOSS | AVERAGE FEMA VERIFIED AMOUNT |
|---|---|---|---|---|---|---|
| Plaquemines | 2,781.00 | 1,875.00 | 887.00 | 1,227.00 | $1,267,011.97 | $1,032.61 |
| Point Coupee | 2,476.00 | 2,262.00 | 37.00 | 37.00 | $135,663.86 | $3,666.59 |
| St. Bernard | 6,846.00 | 4,903.00 | 2,506.00 | 3,203.00 | $2,607,485.72 | $814.08 |
| St. Charles | 5,678.00 | 4,761.00 | 3,081.00 | 3,477.00 | $6,087,655.03 | $1,750.84 |
| St. Helena | 992.00 | 738.00 | 337.00 | 403.00 | $341,673.00 | $847.82 |
| St. James | 2,128.00 | 1,812.00 | 937.00 | 1,026.00 | $1,946,749.91 | $1,897.42 |
| St. John the Baptist | 6,556.00 | 5,853.00 | 3,629.00 | 3,796.00 | $11,548,345.84 | $3,042.24 |
| St. Mary | 4,375.00 | 3,469.00 | 144.00 | 152.00 | $625,674.19 | $4,116.28 |
| St. Tammany | 24,535.00 | 15,129.00 | 4,996.00 | 7,577.00 | $5,332,522.69 | $703.78 |
| Tangipahoa | 17,873.00 | 13,022.00 | 6,407.00 | 7,695.00 | $9,219,584.16 | $1,198.13 |
| Terrebonne | 15,788.00 | 13,029.00 | 8,208.00 | 9,365.00 | $16,243,223.26 | $1,734.46 |
| Washington | 4,483.00 | 3,133.00 | 673.00 | 850.00 | $1,161,327.25 | $1,366.27 |
| West Baton Rouge | 2,399.00 | 1,901.00 | 61.00 | 62.00 | $262,632.16 | $4,236.00 |
| West Feliciana | 632.00 | 547.00 | 11.00 | 11.00 | $36,425.62 | $3,311.42 |
| **Total** | **942,421.00** | **684,034.00** | **151,754.00** | **177,158.00** | **$236,286,735.46** | **$114,355.51** |

## FEMA IA APPLICATIONS BY HOUSING TYPE

| RESIDENCE TYPE | # OF APPLICANTS | % OWNER OCCUPIED | % TENANTS | % UNKNOWN | % TYPE |
|---|---|---|---|---|---|
| Apartment | 193,528.00 | 0.00% | 37.00% | 17.00% | 0.18 |
| Assisted Living Facility | 2,538.00 | 0.00% | 1.00% | 0.00% | 0 |
| Boat | 622.00 | 0.00% | 0.00% | 0.00% | 0 |
| College Dorm | 626.00 | 0.00% | 0.00% | 0.00% | 0 |
| Condo | 9,868.00 | 1.00% | 2.00% | 1.00% | 0.01 |
| Correctional Facility | 51.00 | 0.00% | 0.00% | 0.00% | 0 |
| House/Duplex | 715,902.00 | 84.00% | 50.00% | 69.00% | 0.65 |
| Military Housing | 1,326.00 | 0.00% | 0.00% | 0.00% | 0 |

| RESIDENCE TYPE | # OF APPLICANTS | % OWNER OCCUPIED | % TENANTS | % UNKNOWN | % TYPE |
|---|---|---|---|---|---|
| Mobile Home | 118,396.00 | 11.00% | 5.00% | 9.00% | 0.11 |
| Other | 22,772.00 | 1.00% | 2.00% | 2.00% | 0.02 |
| Townhouse | 18,077.00 | 1.00% | 3.00% | 2.00% | 0.02 |
| Travel Trailer | 10,165.00 | 1.00% | 0.00% | 0.00% | 0.01 |
| Unknown | 15.00 | 0.00% | 0.00% | 0.00% | 0 |

*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 |
|---|---|---|---|---|---|
| Acadia | 251.00 | 202.00 | 110.00 | 9.00 | 7.00 |
| Allen | 255.00 | 249.00 | 165.00 | 13.00 | 8.00 |
| Beauregard | 606.00 | 465.00 | 353.00 | 36.00 | 22.00 |
| Caddo | 60.00 | 120.00 | 72.00 | 8.00 | 4.00 |
| Calcasieu | 2,794.00 | 3,621.00 | 3,200.00 | 390.00 | 201.00 |
| Cameron | 92.00 | 164.00 | 270.00 | 93.00 | 179.00 |
| Grant | 111.00 | 85.00 | 89.00 | 5.00 | 11.00 |
| Iberia | 270.00 | 181.00 | 77.00 | 45.00 | 1.00 |
| Jackson | 31.00 | 17.00 | 15.00 | 1.00 | 3.00 |
| Jefferson Davis | 274.00 | 259.00 | 192.00 | 25.00 | 10.00 |
| La Salle | 17.00 | 14.00 | 2.00 | 0.00 | 0.00 |
| Lafayette | 247.00 | 136.00 | 63.00 | 5.00 | 4.00 |
| Lincoln | 32.00 | 27.00 | 25.00 | 4.00 | 0.00 |
| Morehouse | 45.00 | 50.00 | 27.00 | 2.00 | 1.00 |
| Natchitoches | 114.00 | 66.00 | 45.00 | 4.00 | 3.00 |
| Ouachita | 167.00 | 133.00 | 68.00 | 4.00 | 8.00 |
| Rapides | 410.00 | 346.00 | 279.00 | 21.00 | 19.00 |
| Sabine | 87.00 | 46.00 | 15.00 | 4.00 | 2.00 |
| St. Landry | 245.00 | 180.00 | 82.00 | 9.00 | 1.00 |

| COUNTY | UNITS WITH MINOR-LOW | UNITS WITH MINOR-HIGH | UNITS WITH MAJOR-HIGH | UNITS WITH MAJOR-LOW | UNITS WITH SEVERE |
|---|---|---|---|---|---|
| St. Martin | 234.00 | 146.00 | 57.00 | 10.00 | 5.00 |
| Union | 59.00 | 37.00 | 30.00 | 0.00 | 1.00 |
| Vermilion | 233.00 | 187.00 | 107.00 | 9.00 | 8.00 |
| Vernon | 258.00 | 154.00 | 122.00 | 7.00 | 12.00 |
| Winn | 52.00 | 37.00 | 30.00 | 3.00 | 2.00 |
| Ascension | 1,091.00 | 990.00 | 458.00 | 185.00 | 62.00 |
| Assumption | 440.00 | 380.00 | 198.00 | 51.00 | 16.00 |
| East Baton Rouge | 1,756.00 | 1,366.00 | 652.00 | 188.00 | 32.00 |
| East Feliciana | 103.00 | 40.00 | 16.00 | 4.00 | 2.00 |
| Iberville | 281.00 | 264.00 | 132.00 | 32.00 | 6.00 |
| Jefferson | 5,854.00 | 5,747.00 | 3,079.00 | 1,593.00 | 637.00 |
| Lafourche | 806.00 | 1,094.00 | 1,047.00 | 794.00 | 412.00 |
| Livingston | 1,650.00 | 1,210.00 | 712.00 | 293.00 | 96.00 |
| Orleans | 4,953.00 | 4,954.00 | 2,017.00 | 834.00 | 184.00 |
| Plaquemines | 676.00 | 483.00 | 258.00 | 131.00 | 78.00 |
| Pointe Coupee | 49.00 | 56.00 | 13.00 | 8.00 | 3.00 |
| St. Bernard | 782.00 | 664.00 | 293.00 | 103.00 | 37.00 |
| St. Charles | 783.00 | 1,181.00 | 955.00 | 481.00 | 219.00 |
| St. Helena | 567.00 | 395.00 | 183.00 | 69.00 | 25.00 |
| St. James | 442.00 | 617.00 | 544.00 | 247.00 | 82.00 |
| St. John the Baptist | 745.00 | 1,276.00 | 1,417.00 | 1,026.00 | 350.00 |
| St. Mary | 275.00 | 250.00 | 126.00 | 57.00 | 16.00 |
| St. Tammany | 2,726.00 | 1,678.00 | 906.00 | 395.00 | 147.00 |
| Tangipahoa | 2,936.00 | 2,525.00 | 1,515.00 | 658.00 | 206.00 |
| Terrebonne | 570.00 | 867.00 | 739.00 | 469.00 | 285.00 |
| Washington | 633.00 | 525.00 | 235.00 | 81.00 | 17.00 |

| COUNTY | UNITS WITH MINOR-LOW | UNITS WITH MINOR-HIGH | UNITS WITH MAJOR-HIGH | UNITS WITH MAJOR-LOW | UNITS WITH SEVERE |
|---|---|---|---|---|---|
| West Baton Rouge | 68.00 | 71.00 | 29.00 | 11.00 | 3.00 |
| West Feliciana | 22.00 | 25.00 | 11.00 | 5.00 | 0.00 |
| Total | **35,152.00** | **33,580.00** | **21,020.00** | **8,422.00** | **3,427.00** |

*Data Source(s): FEMA IA Data*
*The monetary thresholds are defined in Appendix D.*

## FEMA REAL PROPERTY DAMAGE RENTAL UNITS

| COUNTY | UNITS WITH MINOR-LOW | UNITS WITH MINOR-HIGH | UNITS WITH MAJOR-LOW | UNITS WITH MAJOR-HIGH | UNITS WITH SEVERE |
|---|---|---|---|---|---|
| Acadia | 173.00 | 122.00 | 106.00 | 22.00 | 3.00 |
| Allen | 102.00 | 63.00 | 87.00 | 9.00 | 5.00 |
| Beauregard | 239.00 | 130.00 | 89.00 | 30.00 | 5.00 |
| Caddo | 262.00 | 235.00 | 254.00 | 67.00 | 24.00 |
| Calcasieu | 5,851.00 | 3,841.00 | 4,035.00 | 1,096.00 | 278.00 |
| Cameron | 47.00 | 60.00 | 82.00 | 43.00 | 37.00 |
| Grant | 18.00 | 16.00 | 21.00 | 10.00 | 0.00 |
| Iberia | 173.00 | 42.00 | 19.00 | 9.00 | 1.00 |
| Jackson | 14.00 | 4.00 | 5.00 | 1.00 | 1.00 |
| Jefferson Davis | 141.00 | 113.00 | 100.00 | 33.00 | 7.00 |
| La Salle | 5.00 | 1.00 | 5.00 | 0.00 | 0.00 |
| Lafayette | 200.00 | 122.00 | 122.00 | 25.00 | 6.00 |
| Lincoln | 26.00 | 23.00 | 16.00 | 1.00 | 0.00 |
| Morehouse | 22.00 | 28.00 | 21.00 | 4.00 | 3.00 |
| Natchitoches | 58.00 | 31.00 | 67.00 | 18.00 | 5.00 |
| Ouachita | 168.00 | 171.00 | 189.00 | 40.00 | 6.00 |
| Rapides | 390.00 | 334.00 | 391.00 | 105.00 | 22.00 |
| Sabine | 18.00 | 11.00 | 19.00 | 3.00 | 0.00 |
| St. Landry | 173.00 | 98.00 | 128.00 | 40.00 | 13.00 |

| COUNTY | UNITS WITH MINOR-LOW | UNITS WITH MINOR-HIGH | UNITS WITH MAJOR-LOW | UNITS WITH MAJOR-HIGH | UNITS WITH SEVERE |
|---|---|---|---|---|---|
| St. Martin | 138.00 | 64.00 | 33.00 | 8.00 | 1.00 |
| Union | 14.00 | 5.00 | 10.00 | 3.00 | 3.00 |
| Vermilion | 66.00 | 36.00 | 47.00 | 11.00 | 4.00 |
| Vernon | 141.00 | 66.00 | 67.00 | 12.00 | 2.00 |
| Winn | 24.00 | 14.00 | 11.00 | 5.00 | 0.00 |
| Ascension | 1,247.00 | 264.00 | 111.00 | 54.00 | 5.00 |
| Assumption | 309.00 | 77.00 | 35.00 | 23.00 | 3.00 |
| East Baton Ruge | 6,009.00 | 965.00 | 487.00 | 238.00 | 26.00 |
| East Feliciana | 111.00 | 1.00 | 2.00 | 2.00 | 0.00 |
| Iberville | 293.00 | 104.00 | 133.00 | 16.00 | 4.00 |
| Jefferson | 20,251.00 | 3,826.00 | 1,905.00 | 1,259.00 | 200.00 |
| Livingston | 1,298.00 | 214.00 | 126.00 | 39.00 | 4.00 |
| Orleans | 25,177.00 | 4,572.00 | 2,263.00 | 1,136.00 | 99.00 |
| Plaquemines | 514.00 | 123.00 | 58.00 | 42.00 | 8.00 |
| Pointe Coupee | 99.00 | 14.00 | 17.00 | 2.00 | 0.00 |
| St. Bernard | 1,631.00 | 309.00 | 157.00 | 67.00 | 6.00 |
| St. Charles | 1,843.00 | 499.00 | 254.00 | 256.00 | 34.00 |
| St. Helena | 271.00 | 27.00 | 18.00 | 7.00 | 0.00 |
| St. James | 632.00 | 153.00 | 90.00 | 88.00 | 9.00 |
| St. John the Baptist | 1,715.00 | 731.00 | 569.00 | 508.00 | 171.00 |
| St. Mary | 310.00 | 55.00 | 33.00 | 25.00 | 9.00 |
| St. Tammany | 3,287.00 | 553.00 | 351.00 | 169.00 | 20.00 |
| Tangipahoa | 4,337.00 | 1,017.00 | 668.00 | 328.00 | 24.00 |
| Terrebonne | 1,327.00 | 377.00 | 192.00 | 219.00 | 31.00 |
| Washington | 851.00 | 167.00 | 59.00 | 24.00 | 1.00 |
| West Baton Rouge | 132.00 | 18.00 | 15.00 | 12.00 | 1.00 |

| COUNTY | UNITS WITH MINOR-LOW | UNITS WITH MINOR-HIGH | UNITS WITH MAJOR-LOW | UNITS WITH MAJOR-HIGH | UNITS WITH SEVERE |
|---|---|---|---|---|---|
| West Feliciana | **22.00** | **6.00** | **5.00** | **1.00** | **0.00** |
| Lafourche | **1,204.00** | **352.00** | **233.00** | **185.00** | **15.00** |
| Total | **81,333.00** | **20,054.00** | **13,705.00** | **6,295.00** | **1,096.00** |

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

## 2. Public Housing and Affordable Housing

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

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

# SUBSTANTIAL AMENDMENT NO. 1

## Public Housing and Affordable Housing

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.

## MULTIFAMILY ASSISTED HOUSING - 2020

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

*Data Source(s): HUD Final Draft Housing Impact Assessment*
*FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.*

LOUISIANA Office of COMMUNITY DEVELOPMENT

## MULTIFAMILY ASSISTED HOUSING - 2021

| TYPE OF DAMAGE | # OF PROPERTIES | # OF UNITS | # OF UNITS ASSISTED | # OF UNITS WAITING ASSISTANCE | REMAINING UNMET NEED |
|---|---|---|---|---|---|
| Minor-Low | 0.00 | 0.00 | 0.00 | 0.00 | $0.00 |
| Minor-High | 71.00 | 9,567.00 | 3,318.00 | 6,249.00 | $0.00 |
| Major-Low | 15.00 | 1,458.00 | 633.00 | 825.00 | $0.00 |
| Major-High | 0.00 | 0.00 | 0.00 | 0.00 | $0.00 |
| Severe | 23.00 | 3,246.00 | 1,312.00 | 1,934.00 | $0.00 |
| **Total** | **109.00** | **14,271.00** | **5,263.00** | **9,008.00** | |

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

## PUBLIC HOUSING AUTHORITIES DAMAGED - 2020

| COUNTY/MUNICIPALITY | TOTAL # PHAS | TOTAL PHAS DAMAGED | # OF UNITS DAMAGED | REMAINING UNMET NEED |
|---|---|---|---|---|
| All FEMA IA | 63.00 | 17.00 | 1,046.00 | $0.00 |
| **Total** | **63.00** | **17.00** | **1,046.00** | |

*Data Source(s): HUD Exchange*

## PUBLIC HOUSING AUTHORITIES DAMAGED - 2021

| COUNTY | TOTAL # PHAS | TOTAL PHASDAMAGED | # OF UNITS DAMAGED | REMAINING UNMET NEED |
|---|---|---|---|---|
| Statewide | 50.00 | 18.00 | 1,147.00 | $0.00 |
| **Total** | **50.00** | **18.00** | **1,147.00** | |

*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 | 41,713.00 | 36,422.00 | 87.32% |
| Non-LMI | 9,691.00 | 6,224.00 | 64.22% |
| Unknown | 4,636.00 | 3,801.00 | 81.99% |

| INCOME CATEGORY | COUNT | # WITHOUT FLOOD INSURANCE | % WITHOUT FLOOD INSURANCE |
|---|---|---|---|
| **Total** | **56,040.00** | **46,447.00** | |

*Data Source(s): FEMA IA Data*

## INSURANCE CLAIMS AND LOSSES IN DISASTER IMPACTED AREAS

| COUNTY/CITY/ETC. | # OF CLAIMS | # OF CLAIMS RESULTING IN LOSS | DIRECT INCURRED LOSSES ($) |
|---|---|---|---|
| Acadia | 7,009.00 | 4,740.00 | $67,396,341.00 |
| Allen | 4,669.00 | 3,168.00 | $101,159,812.00 |
| Beauregard | 13,337.00 | 9,871.00 | $289,264,431.00 |
| Caddo | 3,500.00 | 1,739.00 | $18,563,131.00 |
| Calcasieu | 109,801.00 | 75,068.00 | $5,392,043,583.00 |
| Cameron | 1,861.00 | 1,193.00 | $166,659,827.00 |
| Grant | 2,900.00 | 2,068.00 | $28,531,663.00 |
| Iberia | 3,051.00 | 1,953.00 | $21,071,012.00 |
| Jackson | 1,199.00 | 704.00 | $6,926,505.00 |
| Jefferson Davis | 7,274.00 | 5,036.00 | $120,168,365.00 |
| La Salle | 863.00 | 555.00 | $5,383,382.00 |
| Lafayette | 19,288.00 | 11,839.00 | $172,933,095.00 |
| Lincoln | 1,848.00 | 1,068.00 | $12,911,806.00 |
| Morehouse | 1,437.00 | 907.00 | $13,557,565.00 |
| Natchitoches | 2,622.00 | 1,605.00 | $20,234,522.00 |
| Ouachita | 10,817.00 | 6,152.00 | $81,347,159.00 |
| Rapides | 18,156.00 | 11,526.00 | $175,428,783.00 |
| Sabine | 1,696.00 | 1,182.00 | $14,666,470.00 |
| St. Landry | 6,276.00 | 4,299.00 | $46,602,717.00 |
| St. Martin | 2,350.00 | 1,503.00 | $14,784,780.00 |
| Union | 1,136.00 | 693.00 | $6,969,343.00 |
| Vermilion | 6,309.00 | 4,500.00 | $61,474,495.00 |
| Vernon | 8,964.00 | 6,678.00 | $112,370,693.00 |

| COUNTY/CITY/ETC. | # OF CLAIMS | # OF CLAIMS RESULTING IN LOSS | DIRECT INCURRED LOSSES ($) |
|---|---|---|---|
| Winn | 1,515.00 | 947.00 | $17,770,520.00 |
| Ascension | 17,007.00 | 10,754.00 | $170,763,421.00 |
| Assumption | 1,744.00 | 1,212.00 | $13,376,089.00 |
| East Baton Rouge | 19,287.00 | 10,018.00 | $130,276,068.00 |
| East Feliciana | 535.00 | 320.00 | $3,024,904.00 |
| Iberville | 838.00 | 488.00 | $5,202,788.00 |
| Jefferson | 98,912.00 | 58,670.00 | $1,265,648,773.00 |
| Lafourche | 30,548.00 | 20,283.00 | $744,260,524.00 |
| Livingston | 14,776.00 | 9,799.00 | $180,494,581.00 |
| Orleans | 70,443.00 | 37,548.00 | $789,303,733.00 |
| Plaquemines | 3,792.00 | 2,260.00 | $53,511,757.00 |
| Pointe Coupee | 151.00 | 82.00 | $1,354,399.00 |
| St. Bernard | 5,395.00 | 2,982.00 | $36,787,013.00 |
| St. Charles | 20,619.00 | 12,612.00 | $515,539,692.00 |
| St. Helena | 743.00 | 493.00 | $8,064,977.00 |
| St. James | 8,170.00 | 5,740.00 | $144,512,244.00 |
| St. John the Baptist | 20,510.00 | 13,582.00 | $468,102,338.00 |
| St. Mary | 566.00 | 317.00 | $3,088,977.00 |
| St. Tammany | 39,571.00 | 20,889.00 | $334,010,834.00 |
| Tangipahoa | 25,661.00 | 16,206.00 | $342,003,534.00 |
| Terrebonne | 43,582.00 | 28,911.00 | $1,054,971,582.00 |
| Washington | 2,480.00 | 1,423.00 | $19,527,711.00 |
| West Baton Rouge | 408.00 | 231.00 | $1,942,241.00 |
| West Feliciana | 141.00 | 74.00 | $56,734.00 |
| Unknown | 6,303.00 | 2,931.00 | $153,901,310.00 |
| **Total** | **670,060.00** | **416,819.00** | **$13,407,946,224.00** |

*Data Source(s): Louisiana Department of Insurance*

LOUISIANA Office of COMMUNITY DEVELOPMENT

## TOTAL HOME LOANS APPROVED BY SBA

| COUNTY | # OF HOME LOANS |
|---|---|
| Acadia | 179.00 |
| Allen | 254.00 |
| Beauregard | 734.00 |
| Caddo | 42.00 |
| Calcasieu | 7,582.00 |
| Cameron | 501.00 |
| Assumption | 64.00 |
| Grant | 90.00 |
| Iberia | 21.00 |
| Jackson | 16.00 |
| Jefferson Davis | 512.00 |
| La Salle | 45.00 |
| Lafayette | 172.00 |
| Lincoln | 22.00 |
| Morehouse | 11.00 |
| Natchitoches | 67.00 |
| Ouachita | 180.00 |
| Ascension | 522.00 |
| Sabine | 35.00 |
| St Landry | 87.00 |
| St Martin | 30.00 |
| Union | 37.00 |
| East Feliciana | 8.00 |
| Vermilion | 234.00 |
| Vernon | 228.00 |
| Winn | 49.00 |
| East Baton Rouge | 524.00 |

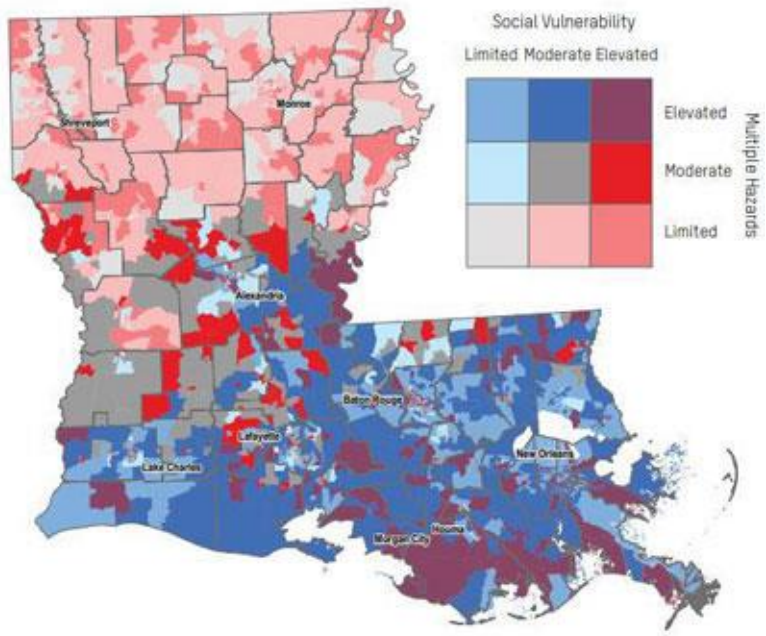
| COUNTY | # OF HOME LOANS |
|---|---|
| Iberville | 23.00 |
| Jefferson | 6,336.00 |
| Lafourche | 2,083.00 |
| Orleans | 4,158.00 |
| Plaquemines | 346.00 |
| Pointe Coupee | 6.00 |
| Rapides | 393.00 |
| St Bernard | 540.00 |
| St Charles | 1,905.00 |
| St Helena | 43.00 |
| St James | 372.00 |
| St Mary | 18.00 |
| St Tammany | 1,942.00 |
| St John The Baptist | 1,366.00 |
| Tangipahoa | 1,221.00 |
| Terrebonne | 2,755.00 |
| Washington | 95.00 |
| West Baton Rouge | 22.00 |
| West Feliciana | 1.00 |
| Livingston | 517.00 |
| **Total** | **36,388.00** |

*Data Source(s): SBA*

## FAIR HOUSING, CIVIL RIGHTS DATA AND ADVANCING EQUITY

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.[1] Moreover, as illustrated by the Social Vulnerability Index (SoVI®) analysis below, many of Louisiana's most disaster-prone – and historically impacted – geographies are co-located with pockets of vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity.




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

As defined in the State Hazard Mitigation Plan, vulnerable populations include persons under the age of 20, persons over the age of 64, persons with disabilities, persons living in poverty, and persons living in manufactured homes. The table below provides a parish-level overview for each of the identified vulnerable populations located within all parishes in the state. As is identified in the program descriptions, the state is prioritizing those most in need of assistance with its housing programs.

LOUISIANA Office of COMMUNITY DEVELOPMENT

## VULNERABLE POPULATIONS

| PARISH | % OF POPULATION YOUNGER THAN 20 | % OF POPULATION OLDER THAN 64 | % OF POPULATION WITH DISABILITIES | % OF POPULATION LIVING IN POVERTY | % OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES | SVI VULNERABILITY |
|---|---|---|---|---|---|---|
| Acadia | 28% | 15% | 19% | 20% | 17% | Moderate to High |
| Allen | 24% | 15% | 20% | 22% | 19% | Moderate to High |
| Ascension | 30% | 11% | 12% | 10% | 19% | Low |
| Assumption | 25% | 17% | 23% | 19% | 32% | High |
| Beauregard | 27% | 15% | 20% | 14% | 31% | Low |
| Caddo | 26% | 17% | 15% | 24% | 9% | Moderate to High |
| Calcasieu | 27% | 15% | 15% | 19% | 16% | Low |
| Cameron | 26% | 16% | 14% | 14% | 38% | Low |
| East Baton Rouge | 26% | 14% | 15% | 18% | 3% | Low |
| East Feliciana | 21% | 17% | 15% | 19% | 31% | Moderate to High |
| Grant | 23% | 15% | 18% | 19% | 29% | Low |
| Iberia | 29% | 15% | 16% | 22% | 21% | High |
| Iberville | 23% | 15% | 20% | 19% | 20% | Moderate to High |
| Jackson | 23% | 20% | 24% | 19% | 20% | High |
| Jefferson | 24% | 17% | 14% | 15% | 2% | Low |
| Jefferson Davis | 28% | 16% | 17% | 19% | 18% | High |
| Lafayette | 26% | 13% | 12% | 17% | 10% | Low |
| Lafourche | 26% | 15% | 17% | 18% | 16% | Low |
| LaSalle | 26% | 17% | 14% | 17% | 28% | High |
| Lincoln | 27% | 13% | 15% | 30% | 18% | Moderate to High |
| Livingston | 28% | 13% | 13% | 12% | 24% | Low |
| Morehouse | 27% | 18% | 14% | 31% | 20% | Moderate to High |
| Natchitoches | 29% | 16% | 14% | 20% | 22% | High |
| Orleans | 23% | 14% | 14% | 24% | 1% | High |
| Ouachita | 28% | 15% | 13% | 24% | 13% | 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 |
|---|---|---|---|---|---|---|
| Plaquemines | 29% | 13% | 15% | 15% | 27% | High |
| Pointe Coupee | 24% | 20% | 27% | 20% | 24% | Moderate to High |
| Rapides | 27% | 16% | 17% | 18% | 16% | Moderate to High |
| Sabine | 26% | 20% | 16% | 18% | 43% | High |
| St. Bernard | 29% | 11% | 18% | 19% | 6% | High |
| St. Charles | 27% | 13% | 12% | 11% | 9% | Low |
| St. Helena | 25% | 19% | 19% | 20% | 36% | High |
| St. James | 25% | 17% | 14% | 17% | 16% | Low |
| St. John the Baptist | 27% | 14% | 13% | 16% | 13% | High |
| St. Landry | 29% | 16% | 12% | 23% | 21% | High |
| St. Martin | 27% | 15% | 15% | 19% | 27% | High |
| St. Mary | 27% | 16% | 18% | 24% | 19% | Moderate to High |
| St. Tammany | 26% | 16% | 15% | 12% | 7% | Low |
| Tangipahoa | 28% | 14% | 20% | 22% | 22% | Moderate to High |
| Terrebonne | 28% | 14% | 17% | 19% | 15% | Moderate to High |
| Union | 26% | 20% | 17% | 19% | 34% | High |
| Vermilion | 28% | 15% | 18% | 17% | 21% | Moderate to High |
| Vernon | 28% | 12% | 18% | 15% | 22% | Low |
| Washington | 26% | 18% | 22% | 25% | 22% | High |
| West Baton Rouge | 26% | 13% | 14% | 14% | 21% | High |
| West Feliciana | 20% | 14% | 12% | 22% | 19% | High |
| Winn | 23% | 18% | 21% | 23% | 23% | High |

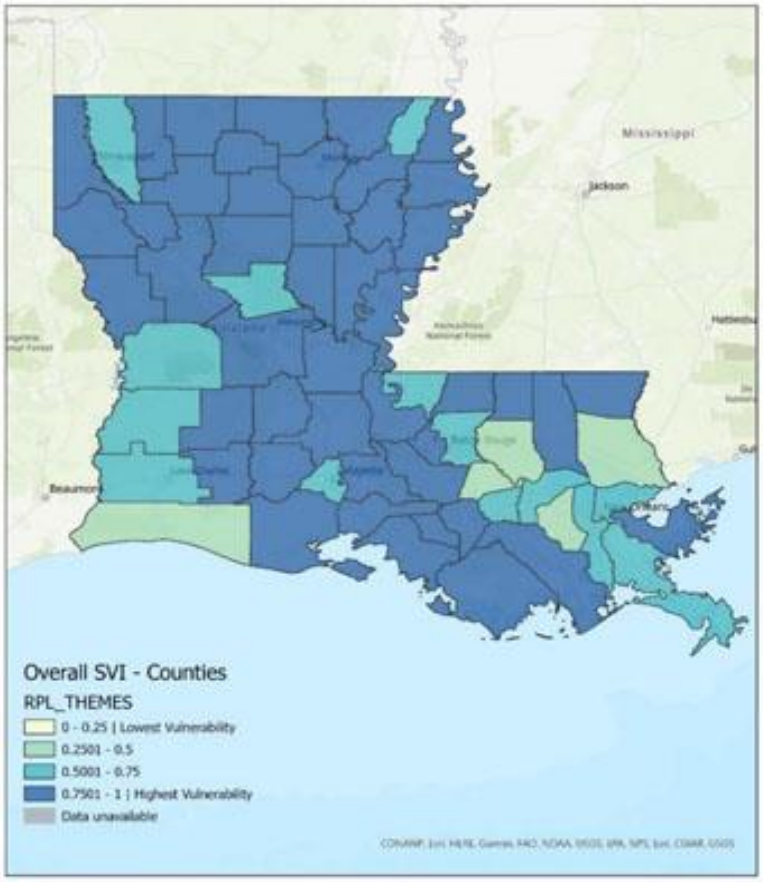
*Source: US Census Bureau, American Community Survey and Small Area Income and Poverty Estimates (SAIPE) tool.*

## SOCIAL VULNERABILITY INDEX

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

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

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




## PROTECTED CLASSES

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

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

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

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

| RACE | % OF HOUSEHOLDS |
|---|---|
| American Indian/Alaskan Native | **0.19%** |
| American Indian/Alaskan Native and Black/African American | **0.06%** |
| American Indian/Alaskan Native and White | **0.12%** |
| Asian | **0.38%** |
| Asian and White | **0.04%** |
| Black/African American | **52.19%** |
| Black/African American and White | **0.86%** |
| Native Hawaiian/Other Pacific Islander | **0.12%** |
| Other multi-racial | **1.25%** |
| Unknown | **31.10%** |
| White | **13.69%** |
| **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). Finally, in areas where a low concentration of homeowners respond to completing the survey, the Program has and can do door-door outreach to canvas these neighborhoods.

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

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

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

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

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

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

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

## HOUSING SUMMARY

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

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

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

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

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

## AFFIRMATIVELY FURTHER FAIR ACTION (AFFA)

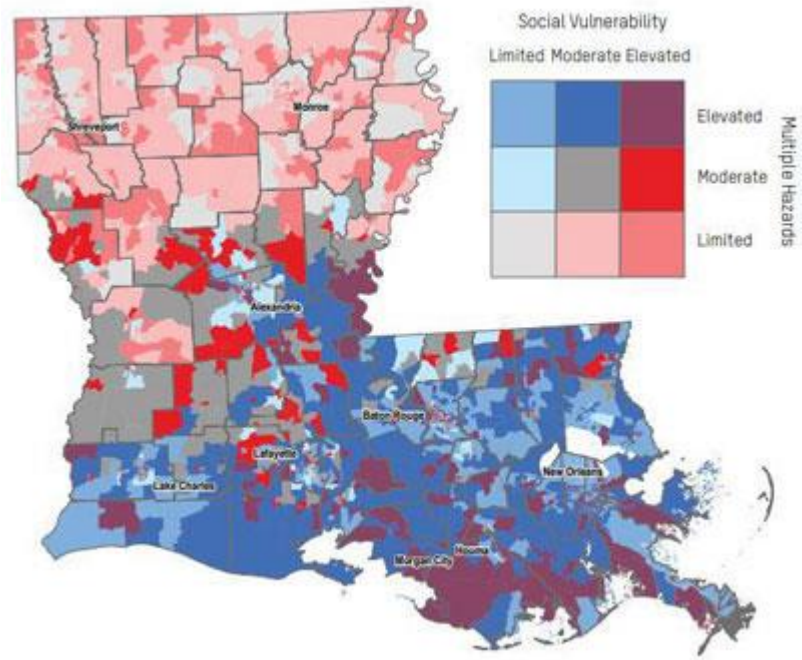
While all programs within the Action Plan are designed for compliance with all applicable statutes and regulations, including Fair Housing, several specific examples of use of the CDBG-DR funds to further the AFFH goals include:

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

# SUBSTANTIAL AMENDMENT NO. 1

## 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.[1] Moreover, as illustrated by the Social Vulnerability Index (SoVI®) analysis below, many of Louisiana's most disaster-prone – and historically impacted – geographies are co-located with pockets of vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity.




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

As defined in the State Hazard Mitigation Plan, vulnerable populations include persons under the age of 20, persons over the age of 64, persons with disabilities, persons living in poverty, and persons living in manufactured homes. The table below provides a parish-level overview for each of the identified vulnerable populations located within all parishes in the state. As is identified in the program descriptions, the state is prioritizing those most in need of assistance with its housing programs.

## VULNERABLE POPULATIONS

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

| 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 |
|---|---|---|---|---|---|---|
| Livingston | 28% | 13% | 13% | 12% | 24% | Low |
| Morehouse | 27% | 18% | 14% | 31% | 20% | Moderate to High |
| Natchitoches | 29% | 16% | 14% | 20% | 22% | High |
| Orleans | 23% | 14% | 14% | 24% | 1% | High |
| Ouachita | 28% | 15% | 13% | 24% | 13% | High |
| Plaquemines | 29% | 13% | 15% | 15% | 27% | High |
| Pointe Coupee | 24% | 20% | 27% | 20% | 24% | Moderate to High |
| Rapides | 27% | 16% | 17% | 18% | 16% | Moderate to High |
| Sabine | 26% | 20% | 16% | 18% | 43% | High |
| St. Bernard | 29% | 11% | 18% | 19% | 6% | High |
| St. Charles | 27% | 13% | 12% | 11% | 9% | Low |
| St. Helena | 25% | 19% | 19% | 20% | 36% | High |
| St. James | 25% | 17% | 14% | 17% | 16% | Low |
| St. John the Baptist | 27% | 14% | 13% | 16% | 13% | High |
| St. Landry | 29% | 16% | 12% | 23% | 21% | High |
| St. Martin | 27% | 15% | 15% | 19% | 27% | High |
| St. Mary | 27% | 16% | 18% | 24% | 19% | Moderate to High |
| St. Tammany | 26% | 16% | 15% | 12% | 7% | Low |
| Tangipahoa | 28% | 14% | 20% | 22% | 22% | Moderate to High |
| Terrebonne | 28% | 14% | 17% | 19% | 15% | Moderate to High |
| Union | 26% | 20% | 17% | 19% | 34% | High |
| Vermilion | 28% | 15% | 18% | 17% | 21% | Moderate to High |
| Vernon | 28% | 12% | 18% | 15% | 22% | Low |
| Washington | 26% | 18% | 22% | 25% | 22% | High |
| West Baton Rouge | 26% | 13% | 14% | 14% | 21% | High |

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

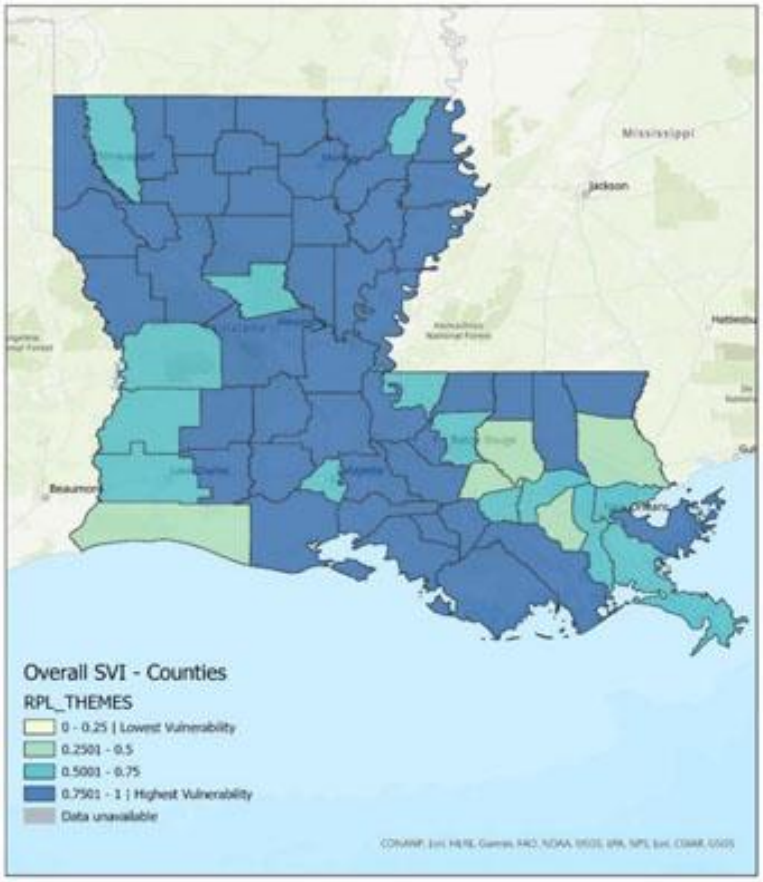
*Source: US Census Bureau, American Community Survey and Small Area Income and Poverty Estimates (SAIPE) tool.*

## SOCIAL VULNERABILITY INDEX

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

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

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




## PROTECTED CLASSES

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

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

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

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

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

## GRANTEE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

| DEMOGRAPHIC | AREA-WIDE ESTIMATES | AREA-WIDE PERCENT | DISASTER DECLARATION ESTIMATE | DISASTER DECLARATION PERCENT | MID ESTIMATES | MID PERCENT |
|---|---|---|---|---|---|---|
| Total Population | **4,664,362.00** | **100.00%** | **4,244,832.00** | **91.00%** | **3,870,539.00** | **83.00%** |
| Under 5 years | **307,435.00** | **7.00%** | **280,068.00** | **91.00%** | **257,401.00** | **84.00%** |
| 65 years and over | **698,018.00** | **15.00%** | **629,464.00** | **90.00%** | **568,771.00** | **81.00%** |
| Population with a Disability | **695,791.00** | **15.00%** | **632,028.00** | **91.00%** | **571,967.00** | **82.00%** |
| White or Caucasian | **2,735,887.00** | **59.00%** | **2,475,300.00** | **90.00%** | **2,252,263.00** | **82.00%** |

| DEMOGRAPHIC | AREA-WIDE ESTIMATES | AREA-WIDE PERCENT | DISASTER DECLARATION ESTIMATE | DISASTER DECLARATION PERCENT | MID ESTIMATES | MID PERCENT |
|---|---|---|---|---|---|---|
| Black or African American | 1,492,386.00 | 32.00% | 1,359,882.00 | 90.00% | 2,252,263.00 | 82.00% |
| American Indian and Alaska Native | 23,892.00 | 1.00% | 22,326.00 | 93.00% | 20,096.00 | 84.00% |
| Asian | 80,014.00 | 17.00% | 76,958.00 | 96.00% | 73,418.00 | 92.00% |
| Native Hawaiian and Other Pacific Islander | 1,088.00 | 1.00% | 896.00 | 80.00% | 867.00 | 80.00% |
| Other | 82,139.00 | 2.00% | 75,951.00 | 92.00% | 69,900.00 | 85.00% |

*Data Source(s): 2019 ACS 5 year*

## EDUCATION DEMOGRAPHICS

| EDUCATION | STATE ESTIMATES | STATE PERCENT | DISASTER DECLARATION ESTIMATE | DISASTER DECLARATION PERCENT | MID ESTIMATES | MID PERCENT |
|---|---|---|---|---|---|---|
| Population 25 and over | 3,125,153.00 | 100.00% | 2,841,789.00 | 91.00% | 2,590,586.00 | 83.00% |
| Less than high school graduate | 461,706.00 | 15.00% | 410,585.00 | 89.00% | 366,090.00 | 79.00% |
| High School graduate or equivalency | 1,061,388.00 | 34.00% | 953,744.00 | 90.00% | 851,104.00 | 80.00% |
| Some college,associate degree | 848,474.00 | 27.00% | 771,150.00 | 91.00% | 709,442.00 | 84.00% |
| Bachelor's degree or higher | 753,585.00 | 24.00% | 706,310.00 | 94.00% | 663,950.00 | 88.00% |

*Data Source(s): 2019 ACS 5 year*

LOUISIANA Office of COMMUNITY DEVELOPMENT

## INCOME DEMOGRAPHICS

| INCOME/ECONOMIC DEMOGRAPHICS | STATEWIDE | AREAS IMPACTED BY DISASTER | HUD MIDS |
|---|---|---|---|
| Median Household Income | $49,469.00 | $47,550.00 | $48,747.00 |
| Per Capita Income | $27,923.00 | $25,653.00 | $26,606.00 |

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

## INCOME DEMOGRAPHICS - LOW INCOME

| INCOME/ECONOMIC DEMOGRAPHICS | STATEWIDE | AREAS IMPACTED BY DISASTER | HUD MIDS |
|---|---|---|---|
| Income in the past 12 months below poverty level | 0.00 | 0.00 | 0.00 |
| Total | | | |

*Data Source(s): OCD*

## LMI ANALYSIS - OVERALL

| CATEGORY | TOTAL LMI PERSONS | TOTAL POPULATION | PERCENT LMI |
|---|---|---|---|
| Area wide | 1,679,170.00 | 4,664,362.00 | 39.00% |

*Data Source(s): 5-Year ACS*

## LMI ANALYSIS - FEDERALLY DECLARED DISASTER AREAS

| COUNTY/MUNICIPALITY | NON-MID-TOTAL LMI PERSONS | NON-MID-TOTAL POPULATION | NON-MID-PERCENTAGE LMI | MID-TOTAL LMI PERSONS | MID-TOTAL POPULATION | MID-PERCENTAGE LMI |
|---|---|---|---|---|---|---|
| Acadia | 0.00 | 0.00 | 0.00% | 175.00 | 257.00 | 68.09% |
| Allen | 0.00 | 0.00 | 0.00% | 196.00 | 287.00 | 68.29% |
| Beauregard | 0.00 | 0.00 | 0.00% | 356.00 | 535.00 | 66.54% |
| Caddo | 0.00 | 0.00 | 0.00% | 328.00 | 429.00 | 76.46% |
| Calcasieu | 0.00 | 0.00 | 0.00% | 6,129.00 | 9,275.00 | 66.08% |
| Cameron | 0.00 | 0.00 | 0.00% | 327.00 | 704.00 | 46.45% |
| Grant | 94.00 | 136.00 | 69.12% | 0.00 | 0.00 | 0.00% |

| COUNTY/MUNICIPALITY | NON-MID-TOTAL LMI PERSONS | NON-MID-TOTAL POPULATION | NON-MID-PERCENTAGE LMI | MID-TOTAL LMI PERSONS | MID-TOTAL POPULATION | MID-PERCENTAGE LMI |
|---|---|---|---|---|---|---|
| Iberia | 119.00 | 132.00 | 90.15% | 0.00 | 0.00 | 0.00% |
| Jackson | 13.00 | 26.00 | 50.00% | 0.00 | 0.00 | 0.00% |
| Jefferson Davis | 0.00 | 0.00 | 0.00% | 247.00 | 367.00 | 67.30% |
| La Salle | 2.00 | 7.00 | 28.57% | 0.00 | 0.00 | 0.00% |
| Lafayette | 0.00 | 0.00 | 0.00% | 183.00 | 225.00 | 81.33% |
| Lincoln | 27.00 | 46.00 | 58.70% | 0.00 | 0.00 | 0.00% |
| Morehouse | 39.00 | 58.00 | 67.24% | 0.00 | 0.00 | 0.00% |
| Natchitoches | 0.00 | 0.00 | 0.00% | 102.00 | 142.00 | 71.83% |
| Ouachita | 0.00 | 0.00 | 0.00% | 219.00 | 315.00 | 69.52% |
| Rapides | 0.00 | 0.00 | 0.00% | 581.00 | 837.00 | 69.41% |
| Sabine | 24.00 | 43.00 | 55.81% | 0.00 | 0.00 | 0.00% |
| St. Landry | 0.00 | 0.00 | 0.00% | 210.00 | 273.00 | 76.92% |
| St. Martin | 101.00 | 114.00 | 88.60% | 0.00 | 0.00 | 0.00% |
| Union | 34.00 | 47.00 | 72.34% | 0.00 | 0.00 | 0.00% |
| Vermilion | 0.00 | 0.00 | 0.00% | 125.00 | 186.00 | 67.20% |
| Vernon | 0.00 | 0.00 | 0.00% | 147.00 | 222.00 | 66.22% |
| Winn | 26.00 | 51.00 | 50.98% | 0.00 | 0.00 | 0.00% |
| Ascension | 7.00 | 11.00 | 63.64% | 744.00 | 864.00 | 86.11% |
| Assumption | 0.00 | 0.00 | 0.00% | 294.00 | 326.00 | 90.18% |
| East Baton Rouge | 271.00 | 382.00 | 70.94% | 1,189.00 | 1,257.00 | 94.59% |
| East Feliciana | 26.00 | 26.00 | 100.00% | 0.00 | 0.00 | 0.00% |
| Iberville | 54.00 | 70.00 | 77.14% | 151.00 | 162.00 | 93.21% |
| Jefferson | 0.00 | 0.00 | 0.00% | 6,182.00 | 8,673.00 | 71.28% |
| Lafourche | 0.00 | 0.00 | 0.00% | 1,711.00 | 2,686.00 | 63.70% |
| Livingston | 0.00 | 0.00 | 0.00% | 1,111.00 | 1,270.00 | 87.48% |
| Orleans | 0.00 | 0.00 | 0.00% | 5,921.00 | 6,533.00 | 90.63% |
| Plaquemines | 0.00 | 0.00 | 0.00% | 505.00 | 575.00 | 87.83% |

| COUNTY/MUNICIPALITY | NON-MID-TOTAL LMI PERSONS | NON-MID-TOTAL POPULATION | NON-MID-PERCENTAGE LMI | MID-TOTAL LMI PERSONS | MID-TOTAL POPULATION | MID-PERCENTAGE LMI |
|---|---|---|---|---|---|---|
| Pointe Coupee | 43.00 | 43.00 | 100.00% | 0.00 | 0.00 | 0.00% |
| St. Bernard | 0.00 | 0.00 | 0.00% | 597.00 | 663.00 | 90.05% |
| St. Charles | 0.00 | 0.00 | 0.00% | 1,460.00 | 2,199.00 | 66.39% |
| St. Helena | 0.00 | 0.00 | 0.00% | 282.00 | 302.00 | 93.38% |
| St. James | 0.00 | 0.00 | 0.00% | 875.00 | 1,060.00 | 82.55% |
| St. John the Baptist | 0.00 | 0.00 | 0.00% | 2,790.00 | 4,041.00 | 69.04% |
| St. Mary | 0.00 | 0.00 | 0.00% | 252.00 | 266.00 | 94.74% |
| St. Tammany | 0.00 | 0.00 | 0.00% | 1,639.00 | 1,988.00 | 82.44% |
| Tangipahoa | 0.00 | 0.00 | 0.00% | 2,925.00 | 3,399.00 | 86.05% |
| Terrebone | 0.00 | 0.00 | 0.00% | 1,302.00 | 1,935.00 | 67.29% |
| Washington | 0.00 | 0.00 | 0.00% | 358.00 | 417.00 | 85.85% |
| West Baton Rouge | 0.00 | 0.00 | 0.00% | 70.00 | 71.00 | 98.59% |
| West Feliciana | 22.00 | 22.00 | 100.00% | 0.00 | 0.00 | 0.00% |
| **Total** | **902.00** | **1,214.00** | | **39,683.00** | **52,741.00** | |

*Data Source(s): FEMA IA Data*

## MANUFACTURED HOUSING UNITS IMPACTED BY DISASTER

| COUNTY/MUNICIPALITY | NUMBER OF UNITS | % OF TOTAL UNITS IN COUNTY/MUNICIPALITY | REMAINING UNMET NEED |
|---|---|---|---|
| Acadia | 329.00 | 1.00% | $0.00 |
| Allen | 330.00 | 1.00% | $0.00 |
| Ascension | 1,690.00 | 4.00% | $0.00 |
| Assumption | 839.00 | 2.00% | $0.00 |
| Beauregard | 912.00 | 2.00% | $0.00 |
| Caddo | 33.00 | 0.00% | $0.00 |
| Calcasieu | 10,677.00 | 26.00% | $0.00 |
| Cameron | 420.00 | 1.00% | $0.00 |

| COUNTY/MUNICIPALITY | NUMBER OF UNITS | % OF TOTAL UNITS IN COUNTY/MUNICIPALITY | REMAINING UNMET NEED |
|---|---|---|---|
| East Baton Rouge | 487.00 | 1.00% | $0.00 |
| East Feliciana | 126.00 | 0.00% | $0.00 |
| Grant | 155.00 | 0.00% | $0.00 |
| Iberia | 400.00 | 1.00% | $0.00 |
| Iberville | 395.00 | 1.00% | $0.00 |
| Jackson | 19.00 | 0.00% | $0.00 |
| Jefferson | 1,128.00 | 3.00% | $0.00 |
| Jefferson Davis | 361.00 | 1.00% | $0.00 |
| LaSalle | 18.00 | 0.00% | $0.00 |
| Lafayette | 298.00 | 1.00% | $0.00 |
| Lafourche | 1,791.00 | 4.00% | $0.00 |
| Lincoln | 44.00 | 0.00% | $0.00 |
| Livingston | 2,970.00 | 7.00% | $0.00 |
| Morehouse | 32.00 | 0.00% | $0.00 |
| Natchitoches | 146.00 | 0.00% | $0.00 |
| Orleans | 129.00 | 0.00% | $0.00 |
| Ouachita | 143.00 | 0.00% | $0.00 |
| Plaquemines | 1,389.00 | 3.00% | $0.00 |
| Pointe Coupee | 116.00 | 0.00% | $0.00 |
| Rapides | 425.00 | 1.00% | $0.00 |
| Sabine | 94.00 | 0.00% | $0.00 |
| St. Bernard | 427.00 | 1.00% | $0.00 |
| St. Charles | 1,310.00 | 3.00% | $0.00 |
| St. Helena | 1,102.00 | 3.00% | $0.00 |
| St. James | 978.00 | 3.00% | $0.00 |
| St. John the Baptist | 1,241.00 | 3.00% | $0.00 |
| St. Landry | 338.00 | 1.00% | $0.00 |
| St. Martin | 164.00 | 0.00% | $0.00 |

| COUNTY/MUNICIPALITY | NUMBER OF UNITS | % OF TOTAL UNITS IN COUNTY/MUNICIPALITY | REMAINING UNMET NEED |
|---|---|---|---|
| St. Mary | 825.00 | 2.00% | $0.00 |
| St. Tammany | 1,698.00 | 4.00% | $0.00 |
| Tangipahoa | 5,390.00 | 13.00% | $0.00 |
| Terrebonne | 1,215.00 | 3.00% | $0.00 |
| Union | 93.00 | 0.00% | $0.00 |
| Vermillion | 281.00 | 1.00% | $0.00 |
| Vernon | 348.00 | 1.00% | $0.00 |
| Washington | 893.00 | 2.00% | $0.00 |
| West Baton Rouge | 132.00 | 0.00% | $0.00 |
| West Feliciana | 68.00 | 0.00% | $0.00 |
| Winn | 62.00 | 0.00% | $0.00 |
| **Total** | **42,461.00** | **100.00%** | |

*Data Source(s): FEMA*

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

| COUNTY | # OF SNAP HOUSEHOLDS IMPACTED | # OF SNAP INDIVIDUALS IMPACTED | # OF HOUSEHOLDS ISSUED D-SNAP BENEFITS | # OF INDIVIDUALS ISSUED D-SNAP BENEFITS |
|---|---|---|---|---|
| Statewide | 575,792.00 | 1,202,619.00 | 505,002.00 | 1,054,764.57 |
| **Total** | **575,792.00** | **1,202,619.00** | **505,002.00** | **1,054,764.57** |

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

## LIMITED ENGLISH PROFICIENCY BREAKDOWN OF DISASTER-RELATED AREAS

| COUNTY/MUNICIPALITY | ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL' | PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL' |
|---|---|---|
| Acadia | 1,499.00 | 1.00% |
| Allen | 653.00 | 1.00% |
| Ascension | 1,843.00 | 1.00% |
| Assumption | 515.00 | 0.00% |

| COUNTY/MUNICIPALITY | ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL' | PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL' |
|---|---|---|
| Beauregard | 393.00 | 0.00% |
| Caddo | 3,262.00 | 3.00% |
| Calcasieu | 3,455.00 | 3.00% |
| Cameron | 97.00 | 0.00% |
| East Baton Rouge | 12,168.00 | 10.00% |
| East Feliciana | 18.00 | 0.00% |
| Grant | 700.00 | 1.00% |
| Iberia | 2,438.00 | 2.00% |
| Iberville | 226.00 | 0.00% |
| Jackson | 142.00 | 0.00% |
| Jefferson | 33,538.00 | 27.00% |
| Jefferson Davis | 460.00 | 0.00% |
| Lafayette | 7,381.00 | 6.00% |
| Lafourche | 3,832.00 | 3.00% |
| La Salle | 254.00 | 0.00% |
| Lincoln | 1,147.00 | 1.00% |
| Livingston | 1,257.00 | 1.00% |
| Morehouse | 140.00 | 0.00% |
| Natchitoches | 275.00 | 0.00% |
| Orleans | 12,754.00 | 10.00% |
| Ouachita | 941.00 | 1.00% |
| Plaquemines | 683.00 | 1.00% |
| Pointe Coupee | 299.00 | 0.00% |
| Rapides | 2,428.00 | 2.00% |
| Sabine | 198.00 | 0.00% |
| St. Bernard | 1,748.00 | 1.00% |
| St. Charles | 1,029.00 | 1.00% |
| St. Helena | 94.00 | 0.00% |

| COUNTY/MUNICIPALITY | ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL' | PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL' |
|---|---|---|
| St. James | 175.00 | 0.00% |
| St. John the Baptist | 945.00 | 1.00% |
| St. Landry | 2,419.00 | 2.00% |
| St. Martin | 2,245.00 | 2.00% |
| St. Mary | 1,835.00 | 1.00% |
| St. Tammany | 5,217.00 | 4.00% |
| Tangipahoa | 1,725.00 | 1.00% |
| Terrebonne | 2,870.00 | 2.00% |
| Union | 254.00 | 0.00% |
| Vermilion | 2,348.00 | 2.00% |
| Vernon | 981.00 | 1.00% |
| Washington | 1,011.00 | 1.00% |
| West Baton Rouge | 301.00 | 0.00% |
| West Feliciana | 64.00 | 0.00% |
| Winn | 15.00 | 0.00% |
| **Total** | **118,272.00** | |

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

LOUISIANA Office of COMMUNITY DEVELOPMENT

## AFFECTED CONTINUUM OF CARE ENTITIES

| COC NUMBER | COC ENTITY | IMPACTED COUNTY | HOMELESS COUNT |
|---|---|---|---|
| LA-500 | **Lafayette/Acadiana CoC** | **Acadia, St. Landry, St. Martin & Vermilion** | **756.00** |
| LA-502 | **Shreveport, Bossier/Northwest Louisiana CoC** | **Caddo, Bossier** | **490.00** |
| LA-503 | **New Orleans/Jefferson Parish CoC** | **Jefferson and Orleans Parishes** | **2,341.00** |
| LA-505 | **Monroe/Northeast Louisiana CoC** | **Jackson, Lincoln, Morehouse, Ouachita & Union Parishes** | **240.00** |
| LA-506 | **Slidell/Southeast Louisiana CoC** | **Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes** | **188.00** |
| LA-507 | **Alexandria/Central Louisiana CoC** | **Grant, La Salle, Rapides, Vernon & Winn Parishes** | **171.00** |
| LA-509 | **Louisiana Balance of State CoC** | **Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes** | **330.00** |
| **Total** | | | **4,516.00** |

*Data Source(s): HUD Exchange*

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

| GEOGRAPHY | EMERGENCY SHELTER | TRANSITIONAL HOUSING | UNSHELTERED HOMELESS | TOTAL KNOWN HOMELESS |
|---|---|---|---|---|
| Area wide | **2,653.00** | **949.00** | **1,671.00** | **5,273.00** |
| FEMA Declared | **1,027.00** | **321.00** | **593.00** | **1,941.00** |
| MID | **700.00** | **297.00** | **572.00** | **8,783.00** |

*Data Source(s): HUD Exchange*

LOUISIANA Office of COMMUNITY DEVELOPMENT

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

| SCALE OF DATA | EMERGENCY SHELTER | TRANSITIONAL HOUSING | UNSHELTERED HOMELESS | TOTAL KNOWN HOMELESS |
|---|---|---|---|---|
| Area wide | 2,085.00 | 582.00 | 350.00 | 3,465.00 |
| FEMA Declared | 1,255.00 | 267.00 | 559.00 | 2,081.00 |
| MID | 1,244.00 | 261.00 | 538.00 | 2,043.00 |

*Data Source(s): HUD Exchange*

## ASSISTED HOUSING IMPACTED BY THE DISASTER

| COUNTY/ MUNICIPALITY | 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 |
|---|---|---|---|---|---|---|
| Acadia | 773.00 | 0.00 | 610.00 | 0.00 | 756.00 | 60.00 |
| Allen | 391.00 | 2.00 | 267.00 | 0.00 | 322.00 | 16.00 |
| Beauregard | 38.00 | 0.00 | 120.00 | 0.00 | 222.00 | 25.00 |
| Caddo | 4,714.00 | 0.00 | 4,054.00 | 0.00 | 1,062.00 | 0.00 |
| Calcasieu | 2,506.00 | 1,024.00 | 3,880.00 | 1,184.00 | 737.00 | 405.00 |
| Cameron | 0.00 | 0.00 | 70.00 | 0.00 | 0.00 | 0.00 |
| Grant | 0.00 | 0.00 | 0.00 | 0.00 | 163.00 | 48.00 |
| Iberia | 399.00 | 0.00 | 695.00 | 0.00 | 200.00 | 0.00 |
| Jackson | 474.00 | 0.00 | 138.00 | 0.00 | 281.00 | 3.00 |
| Jefferson Davis | 962.00 | 0.00 | 296.00 | 0.00 | 175.00 | 78.00 |
| La Salle | 45.00 | 0.00 | 32.00 | 0.00 | 25.00 | 0.00 |
| Lafayette | 1,958.00 | 0.00 | 2,118.00 | 0.00 | 662.00 | 442.00 |
| Lincoln | 201.00 | 0.00 | 985.00 | 0.00 | 407.00 | 0.00 |
| Morehouse | 0.00 | 1.00 | 603.00 | 0.00 | 40.00 | 0.00 |
| Natchitoches | 552.00 | 0.00 | 809.00 | 0.00 | 166.00 | 0.00 |
| Ouachita | 1,743.00 | 1.00 | 2,510.00 | 0.00 | 1,523.00 | 3.00 |
| Rapides | 1,953.00 | 0.00 | 1,558.00 | 0.00 | 121.00 | 160.00 |

| COUNTY/ MUNICIPALITY | 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 |
|---|---|---|---|---|---|---|
| Sabine | 0.00 | 0.00 | 320.00 | 0.00 | 68.00 | 0.00 |
| St. Landry | 0.00 | 0.00 | 787.00 | 0.00 | 1,038.00 | 0.00 |
| St. Martin | 463.00 | 0.00 | 288.00 | 0.00 | 395.00 | 0.00 |
| Union | 98.00 | 0.00 | 370.00 | 0.00 | 40.00 | 0.00 |
| Vermilion | 721.00 | 0.00 | 696.00 | 0.00 | 469.00 | 53.00 |
| Vernon | 0.00 | 0.00 | 478.00 | 0.00 | 90.00 | 0.00 |
| Winn | 114.00 | 0.00 | 164.00 | 0.00 | 141.00 | 0.00 |
| Ascension | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 |
| East Baton Rouge | 0.00 | 0.00 | 0.00 | 18.00 | 0.00 | 0.00 |
| Jefferson | 0.00 | 83.00 | 0.00 | 374.00 | 0.00 | 39.00 |
| Lafourche | 0.00 | 15.00 | 0.00 | 250.00 | 0.00 | 5.00 |
| Livingston | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 |
| Orleans | 0.00 | 55.00 | 0.00 | 1,773.00 | 0.00 | 0.00 |
| Plaquemines | 0.00 | 5.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| St. Bernard | 0.00 | 0.00 | 0.00 | 3.00 | 0.00 | 0.00 |
| St. Charles | 0.00 | 88.00 | 0.00 | 60.00 | 0.00 | 14.00 |
| St. James | 0.00 | 0.00 | 0.00 | 44.00 | 0.00 | 0.00 |
| St. John the Baptist | 0.00 | 20.00 | 0.00 | 32.00 | 0.00 | 23.00 |
| St. Mary | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 |
| St. Tammany | 0.00 | 0.00 | 0.00 | 41.00 | 0.00 | 2.00 |
| Tangipahoa | 0.00 | 23.00 | 0.00 | 524.00 | 0.00 | 0.00 |
| Terrebonne | 0.00 | 43.00 | 0.00 | 239.00 | 0.00 | 468.00 |
| Washington | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 |
| **Total** | **18,105.00** | **1,360.00** | **21,848.00** | **4,545.00** | **9,103.00** | **1,844.00** |

*Data Source(s): Louisiana Housing Corporation*

# B. INFRASTRUCTURE UNMET NEED

## Disaster Damage and Impacts

### STATEWIDE INFRASTRUCTURE DAMAGE & LOSS ASSESSMENT

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

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

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

### FEMA PUBLIC ASSISTANCE

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

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

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

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

### HAZARD MITIGATION GRANT PROGRAM

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

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

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

The program's narrative describes how resilience planning, preparedness and mitigation measures will be integrated into rebuilding activities for both non-federal match programs in a similar structure implemented in the state's CDBG-MIT programs under the Louisiana Watershed Initiative. These measures

are also built within the FEMA structure and the state shall monitor these efforts. This match aligns with the unmet needs associated with other planned state, local and regional projects.

# SUBSTANTIAL AMENDMENT NO. 1

## 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 transmissions 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, Tornados 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 | **827.00** | **$1,107,620,872.01** | **$1,026,886,885.88** | **$80,733,986.13** |
| B - Emergency Measures | **1,998.00** | **$1,885,284,380.06** | **$1,725,487,824.39** | **$159,796,555.68** |
| C - Roads and Bridges | **156.00** | **$33,302,550.97** | **$29,972,295.99** | **$3,330,254.98** |
| D - Water Control Facilities | **84.00** | **$88,819,326.62** | **$79,937,394.01** | **$8,881,932.61** |
| E - Building and Equipment | **2,678.00** | **$1,515,698,228.15** | **$1,364,407,383.40** | **$151,290,844.75** |
| F - Utilities | **279.00** | **$704,400,669.02** | **$633,969,225.55** | **$70,431,443.47** |
| G - Other | **431.00** | **$71,165,795.72** | **$64,049,216.46** | **$7,116,579.26** |
| All Categories | **6,453.00** | **$5,406,291,822.55** | **$4,924,710,255.67** | **$481,581,596.89** |
| **TOTAL - without A and B:** | **3,628.00** | **$2,413,386,570.48** | **$2,172,335,515.41** | **$241,051,055.07** |

*Data Source(s): GOHSEP*

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## Total Cost and Need by PA Category

| PA CATEGORY | ESTIMATED PA COST | LOCAL MATCH | RESILIENCY | TOTAL NEED (MATCH + RESILIENCY) |
|---|---|---|---|---|
| A - Debris | $1,107,620,872.01 | $110,762,087.20 | $166,143,130.80 | $260,855,984.00 |
| B - Emergency Measures | $1,885,284,380.06 | $188,528,438.01 | $282,792,657.01 | $456,709,425.75 |
| C - Roads and Bridges | $33,302,550.97 | $3,330,255.10 | $4,995,382.65 | $8,325,637.72 |
| D - Water Control Facilities | $88,819,326.62 | $8,881,932.66 | $13,322,898.99 | $22,204,831.63 |
| E - Building and Equipment | $1,515,698,228.15 | $151,569,822.81 | $227,354,734.22 | $378,924,556.03 |
| F - Utilities | $704,400,669.02 | $70,044,066.90 | $105,660,100.35 | $176,100,167.18 |
| G - Other | $71,165,795.72 | $7,115,579.57 | $10,674,869.36 | $17,791,448.82 |
| **Total** | **$5,406,291,822.55** | **$477,232,182.25** | **$810,943,773.38** | **$1,320,912,051.13** |

*Data Source(s): GOHSEP*

## Approximate Recovery Cost per Agency

| AGENCY | APPROXIMATE COST |
|---|---|
| City or Township Government | $339,779,297.00 |
| County Government | $618,652,467.00 |
| Independent School District | $332,609,394.00 |
| Indian/Native American Tribal Government (Federally Recognized) | $3,661,637.00 |
| Indian/Native American Tribally Designated Organization | $84,916.00 |
| Nonprofit with 501C3 IRS Status | $510,453,516.00 |
| Nonprofit without 501C3 IRS Status | $112,502,151.00 |
| Public/Indian Housing Authority | $24,648,729.00 |
| Public/State Controlled Institution of Higher Education | $1,275,507.00 |
| Special District Government | $217,089,769.00 |
| State Government | $445,694,811.00 |
| **Total** | **$2,606,452,194.00** |

*Data Source(s): GOHSEP*

## Hazard Mitigation Needs per County or Known Project

| PROJECT | COST | FUNDING SOURCE | UNMET NEED (10% LOCAL MATCH) |
|---|---|---|---|
| Statewide | **$646,078,352.00** | **FEMA** | **$161,519,588.00** |
| **Total** | **$646,078,352.00** | | **$161,519,588.00** |

*Data Source(s): GOHSEP*

# C. ECONOMIC REVITALIZATION UNMET NEED

## Disaster Damage and Impacts

### STATEWIDE ECONOMIC DAMAGE & LOSS ASSESSMENT

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

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

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

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

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

- Laura: 479,975, nearly 29 percent of all Louisiana workers;

- Delta: 388,277, nearly 23 percent of all Louisiana workers.

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

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

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

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

### BUSINESS & WAGE LOSSES

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

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

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

Additionally, the studies for Hurricanes Laura and Delta estimated losses while also accounting for losses already endured by the region due to Covid-19. To incorporate Covid-19, the study utilized a survey done by the Louisiana Workforce Commission to baseline the Covid-19 impact. The adjustment for firm closures is reduced for wages and employment to account for the fact that smaller firms were more likely to be closed due to COVID than larger firms.

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

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

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

two-digit NAICS industry level. Multiplying these values per employee for the relevant industry by the number of employees at a particular location supplies the baseline estimate of the value of a structure and equipment present at a particular location.

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

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

### AGRICULTURAL LOSSES

Based on estimates completed by the LSU AgCenter, the economic impacts from Hurricanes Laura and Delta on Louisiana's agricultural sector are estimated to be $2.1 billion. Because these hurricanes were predominately wind events rather than flooding events, the destruction of the state's timber industry may be the most devastating in history at $1.4 billion. Destroyed timber will likely be unrecoverable from the southwestern corner to the northeastern corner of the state. The sustained winds are responsible for losses to the timber stock by devastating 1.1 billion acres of timberland. Aerial surveys done by the Louisiana Department of Agriculture and Forestry show the largest economic losses in timber from Hurricane Laura occurred in Vernon Parish with $360 million on 160,416 acres. There was more than $100 million in timber damage in each of Rapides, Beauregard, Grant, and Allen parishes. Calcasieu Parish had 188,292 timber acres lost with an economic value estimated at $76.7 million. From Hurricane Delta, Winn Parish and Vernon Parish had the largest timber losses with each receiving $59 million of estimated losses.

Table below gives the different types of agricultural losses:

| TYPE OF LOSS | LAURA | DELTA | TOTAL |
|---|---|---|---|
| Reduced Production | **$48,400,000** | **$51,100,000** | **$99,500,000** |
| Stored Commodity Loss | **$6,900,000** | **$400,000** | **$7,300,000** |
| Livestock Loss | **$1,400,000** | **$400,000** | **$1,800,000** |
| Increased Production Cost | **$6,700,000** | **$3,800,000** | **$10,500,000** |

| TYPE OF LOSS | LAURA | DELTA | TOTAL |
|---|---|---|---|
| Infrastructure Damage | **$462,000,000** | **$163,500,000** | **$625,500,000** |
| Timber Losses | **$1,100,000,000** | **$297,100,000** | **$1,397,100,000** |
| **Total Losses** | **$1,625,400,000** | **$516,300,000** | **$2,141,700,000** |

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

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

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

## SUMMARY OF ECONOMIC UNMET NEEDS

| TYPE OF LOSS | LAURA | DELTA | TOTAL |
|---|---|---|---|
| Business Structures | **$2,810,100,000** | **$251,500,000** | **$3,061,600,000** |
| Business Equipment | **$1,056,800,000** | **$51,300,000** | **$1,108,100,000** |
| Business Interruption[1] | **$1,914,900,000** | **$601,700,000** | **$2,516,600,000** |
| Agriculture/Timber | **$1,625,400,000** | **$516,300,000** | **$2,141,700,000** |
| Business/EIDL Loans | **$(264,238,450)** | **$(9,457,300** | **$(273,695,750)** |
| Paid/Reserves of Reported Claims | **$(4,182,538,638)** | **$(212,178,268)** | **$(4,394,716,906)** |
| **Total Unmet Needs** | **$2,960,422,912** | **$1,199,343,432** | **$4,159,587,344** |

[1] *includes labor productivity and value-added losses*

LOUISIANA Office of COMMUNITY DEVELOPMENT

# SUBSTANTIAL AMENDMENT NO. 1

## 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.

**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.**

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/EIDL LOANS |
|---|---|
| Acadia | **$1,882,200.00** |
| Allen | **$4,247,200.00** |
| Beauregard | **$5,601,900.00** |
| Caddo | **$66,100.00** |
| Calcasieu | **$219,659,550.00** |
| Cameron | **$2,843,400.00** |
| Grant | **$6,068,800.00** |
| Iberia | **$5,895,200.00** |

| COUNTY | BUSINESS/EIDL LOANS |
|---|---|
| Jackson | $754,200.00 |
| Jefferson Davis | $3,001,500.00 |
| La Salle | $317,300.00 |
| Lafayette | $1,001,400.00 |
| Lincoln | $2,046,800.00 |
| Natchitoches | $1,498,200.00 |
| Ouachita | $5,407,200.00 |
| Rapides | $11,954,200.00 |
| Sabine | $285,000.00 |
| St. Landry | $349,800.00 |
| St. Martin | $120,200.00 |
| Union | $43,100.00 |
| Vermilion | $1,198,400.00 |
| Vernon | $1,525,100.00 |
| Winn | $98,300.00 |
| Ascension | $980,300.00 |
| Assumption | $54,000.00 |
| East Baton Rouge | $2,429,800.00 |
| Iberville | $24,600.00 |
| Jefferson | $26,992,850.00 |
| Lafourche | $13,570,000.00 |
| Orleans | $28,122,500.00 |
| Plaquemines | $1,603,100.00 |
| Pointe Coupee | $948,800.00 |
| St Bernard | $1,314,500.00 |
| St Charles | $6,407,400.00 |
| St Helena | $32,200.00 |
| St James | $449,200.00 |

| COUNTY | BUSINESS/EIDL LOANS |
|---|---|
| St Mary | $90,100.00 |
| St Tammany | $6,134,000.00 |
| St John The Baptist | $3,991,800.00 |
| Tangipahoa | $3,548,300.00 |
| Terrebonne | $13,430,700.00 |
| Washington | $201,600.00 |
| West Baton Rouge | $259,500.00 |
| Livingston | $954,400.00 |
| **Total** | **$387,404,700.00** |

*Data Source(s): SBA*

## SBA Applicant Breakdown

| APPLICATION TYPE | # OF APPLICATIONS | PERCENT |
|---|---|---|
| Total Business Applications | 19,738.00 | 100.00% |
| Processed Applications | 19,162.00 | 97.00% |
| In-Process Applications | 576.00 | 3.00% |
| Declined Applications | 7,935.00 | 40.00% |
| Withdrawn Applications | 6,700.00 | 34.00% |
| Approved Applications | 2,914.00 | 15.00% |

*Data Source(s): SBA*

## Estimating Business Operations Losses

| OPERATIONAL LOSS CATEGORY | COUNT OF BUSINESSES WITH VERIFIED LOSSES | TOTAL VERIFIED LOSS | ESTIMATED ADDITIONAL LOSSES TO BUSINESSES |
|---|---|---|---|
| Furniture | 0.00 | $0.00 | $0.00 |
| Machinery | 61,794.00 | $433,715.00 | $13,187,300,000.00 |
| Inventory | 0.00 | $0.00 | $0.00 |

| OPERATIONAL LOSS CATEGORY | COUNT OF BUSINESSES WITH VERIFIED LOSSES | TOTAL VERIFIED LOSS | ESTIMATED ADDITIONAL LOSSES TO BUSINESSES |
|---|---|---|---|
| Other | 61,794.00 | $282,034.00 | $8,723,824,392.00 |
| **Total** | **123,588.00** | **$715,749.00** | **$21,911,124,392.00** |

*Data Source(s): Louisiana Department of Economic Development*

## Increased Occupation Demands

| OCCUPATION | CURRENTLY UNEMPLOYED | CURRENTLY EMPLOYED | PROJECTED EMPLOYMENT | PROJECTED GROWTH # | PROJECTED GROWTH % | TOTAL JOB OPENINGS | SUPPLY GAP OR OVERAGE |
|---|---|---|---|---|---|---|---|
| 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0% | 0.00 | 0.00 |

*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.

## RESILENCE PLANNING

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

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

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

Today, LWI is coordinating the distribution of $1.2 billion in CDBG-MIT funds, with a focus on educating stakeholders and the public on flood risk and effective mitigation efforts, particularly within underserved communities. Through LWI, the state has held technical assistance sessions for project funding opportunities as well as flood risk presentations in each region of the state. The LWI team also facilitated a nine-part webinar training series on nature-based solutions for flood risk management, along with an information guide published on the LWI website.

Through LWI, the state has also awarded funding to mitigation projects that present alternatives to traditional gray infrastructure projects, such as flood storage projects, nonstructural buyout programs and floodplain preservation projects. Many of these projects are located in areas where our most vulnerable

residents reside. These projects represent mitigation measures that educate the surrounding community on different ways of dealing with flood risk, and also represent significant investments in statewide flood defense to better prepare Louisiana for future and curb the massive costs associated with disaster recovery efforts.

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

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

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

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

"If local code, ordinance, or code enforcement official requires elevation of a home and that home has a slab-on-grade foundation, the only option for assistance under the RLHP Hurricanes of 2020 Solution 1 Program will be reconstruction with elevation. The RLHP will not elevate slab-on-grade structures under

Solution 1. Note: Dirt fill as an elevation method is not eligible under the RLHP and will not be funded under any Program solution."

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

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

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

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

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

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

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

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

# SUBSTANTIAL AMENDMENT NO. 1

## 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.

# SUBSTANTIAL AMENDMENT NO. 3

## 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 and SWIFT which are eligible CDBG-DR activities. All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities such as MIT-Buyout/Safe Housing Incentives. Also, the state will be including mitigation efforts within both direct allocation program but also funding mitigation only activities within resilient infrastructure programs.

# 3. GENERAL REQUIREMENTS

## A. CITIZEN PARTICIPATION

### Outreach and Engagement

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

#### STATE AGENCIES

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

The subcommittee is dedicated to long-term recovery and sustainability and will be a key mechanism in implementing the State Hazard Mitigation Program (SHMP). The subcommittee is aligned with the ESF 14 State of Louisiana Disaster Recovery Framework and FEMA's National Disaster Recovery Framework. During EOC activation, the LTRS is convened alongside the UCG to 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.

| STATE | LOCAL COMMUNITY | RECOVERY FRAMEWORK AND IMPLEMENTATION |
|---|---|---|
| • Conducts impact and unmet needs and assessment<br>• Meets with local government and community partners to discuss assessment results and transmits recovery strategy | • City Elected Government<br>• Parish Elected Government<br>• OHSEP<br>• Tribal Authority<br>• Private Sector<br>• Non- Government Organizations | • Identify and choose a leader<br>• Establish a planning team<br>• Secure outside support<br>• Establish a public information campaign<br>• Achieve consensus<br>• Identify recovery issues<br>• Articulate a vision<br>• Identify, evaluate and prioritize resilience projects<br>• Develop a plan<br>• Choose project champions<br>• Funding Strategy<br>• Implementation<br>• Update the plan |

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 been limited to:

- **RSF 1 – Planning and Capacity** conducted an assessment of local governmental jurisdiction using data available in the public domain and hurricane impact data to determine the level of ability for local jurisdictions to plan and execute a comprehensive recovery effort, given the existing implications of COVID-19 on local budgets and the economy. This assessment has been vetted and coordinated through focus group meetings in cooperation with state agencies, the Louisiana Municipal Association; the Louisiana Police Jury Association; the State Chapters of the American Planning Association and the American Institute of Architects; the Louisiana Association of Planning Districts; and the eight Watershed Regions and other organizations. Additionally, RSF 1 is participating in the regular monthly meetings of the aforementioned organizations for mutual updates and further collaboration. This assessment is identifying short- and long-term needs – i.e. staffing and expertise gaps, training and technical assistance needed 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

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

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

## LOCAL GOVERNMENTS

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

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

## FEDERAL PARTNERS

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

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

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

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

- **Telephone, voice**: 225-219-9600 or LA Relay Service 711;
- **Email**: ocd@la.gov; or
- **Mail to**: Office of Community Development, Post Office Box 94095 Baton Rouge, LA, 70804-9095.

### EQUAL ACCESS TO INFORMATION

In addition to the activities above, the *Louisiana Office of Community Development-Disaster Recovery Unit* has published this action plan on https://www.doa.la.gov/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* citizen participation plan that can be found at https://www.doa.la.gov/doa/ocd/.

## SUBSTANTIAL AMENDMENT NO. 1

### OUTREACH AND ENGAGEMENT

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| | | |
|---|---|---|
| | | • Implementation<br>• Update the plan |

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- Louisiana Department of Agriculture and Forestry, or his
- Louisiana Department of Wildlife and Fisheries, or his
- Lieutenant Governor Office
- Louisiana Department of Children and Family Services
- Louisiana Department of Health
- Louisiana Department of Education
- Department of Transportation and Development
- Louisiana Housing Corporation
- Louisiana Economic Development
- Coastal Protection and Restoration Authority

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

- **RSF 1 – Planning and Capacity** conducted an assessment of local governmental jurisdiction using data available in the public domain and hurricane impact data to determine the level of ability for local jurisdictions to plan and execute a comprehensive recovery effort, given the existing implications of COVID-19 on local budgets and the economy. This assessment has been vetted and coordinated through focus group meetings in cooperation with state agencies, the Louisiana Municipal Association; the Louisiana Police Jury Association; the State Chapters of the American Planning Association and the

American Institute of Architects; the Louisiana Association of Planning Districts; and the eight Watershed Regions and other organizations. Additionally, RSF 1 is participating in the regular monthly meetings of the organizations for mutual updates and further collaboration. This assessment is identifying short- and long-term needs – i.e. staffing and expertise gaps, training and technical assistance needed broadband and other technology issues, and funding gaps and resources which may be needed to sustain their operations.

- The state and FEMA conducted a new training curriculum - a Just-In-Time (JIT) Training – an ongoing series designed for and targeting local elected officials and their key recovery staff, to assist them in focusing, in real-time, on current issues of response and recovery at various intervals following the Modules were refined to address specific issues emanating from the disasters based on the type of staff participants and the impacted jurisdictions represented.
- The state's "Long Term Resilience Planning Guide", drafted after the 2016 Floods and implemented as a pilot resulting in two "best practices" to planning – the Ouachita Strong and the Denham Strong Plans -is being revised and updated to reflect the flood risk standards subsequently developed by the Watershed Initiative; guidance on planning regionally as opposed to an independent jurisdictional approach; the inclusion of the current mitigation approaches and the use of effective facilitation skills and the use of Zoom and other virtual and social media platforms to ensure inclusiveness in soliciting public input and a partnership with local residents.

- **RSF 2 – Economic Development**, under the leadership of the Louisiana Economic Development Department activated an emergency contract to assess damages to businesses and the local economy, covering physical damages to business, business interruption, loss of revenues to individual businesses, the agriculture economy, and state 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 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* 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 MIDs to solicit citizen comments. To comply with this requirement and to maximize citizen participation efforts, the state will hold five public hearings in different locations across the HUD-identified MIDs 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 |
|---|---|---|---|
| Public Hearing #1 | **March 9, 2022** | **In-Person** | **Rapides Parish (Alexandria, LA)** |
| Public Hearing #2 | **March 9, 2022** | **In-Person** | **Calcasieu Parish (Lake Charles, LA)** |
| Public Hearing #3 | **March 14, 2022** | **Virtual** | **All--including coordination with State Tribal office and VOADS.** |
| Public Hearing #4 | **March 16, 2022** | **In-Person** | **Caddo Parish (Shreveport, LA)** |
| Public Hearing #5 | **March 16, 2022** | **In-Person** | **Ouachita Parish (Monroe, LA)** |
| Public Hearing #1 | **March 9, 2022** | **In-Person** | **Rapides Parish (Alexandria, LA)** |
| Public Hearing #2 | **March 9, 2022** | **In-Person** | **Calcasieu Parish (Lake Charles, LA)** |

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

# SUBSTANTIAL AMENDMENT NO. 1

## 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 MIDs 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 MIDs 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 14, 2022** | **In-Person** | **Meeting #1** |
| Meeting #2 | **June 21, 2022** | **Virtual** | **Meeting #2** |
| Meeting #3 | **June 22, 2022** | **In-Person** | **Meeting #3** |
| Meeting #4 | **June 23, 2022** | **In-Person** | **Meeting #4** |
| Meeting #5 | **June 28, 2022** | **In-Person** | **Meeting #5** |
| Meeting #6 | **June 29, 2022** | **In-Person** | **Meeting #6** |

**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 will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

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

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

# C. AMENDMENTS

Over time, recovery needs will change. Thus, the Louisiana Office of Community Development-Disaster Recovery Unit will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

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

## Substantial Amendment

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

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

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

## Non-Substantial Amendment

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

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

# D. DISPLACEMENT OF PERSONS AND OTHER ENTITIES

To minimize the displacement of individuals, families, businesses, farms, and nonprofit organizations that may be affected by the activities outlined in this action plan, *Louisiana Office of Community Development - Disaster Recovery Unit* will coordinate with all agencies and entities necessary to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and the implementing regulations at 24 CFR Part 570.496(a) to minimize displacement.

Displacement policies and procedures apply to both property owners and renters. Should any proposed projects or activities cause the displacement of people, the appropriate policies will be adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

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

# E. PROTECTION OF PEOPLE AND 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.

Non-residential structures, including infrastructure, will be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3( c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or one percent annual chance) floodplain. All Critical Actions as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual change) floodplain will be elevated or floodproofed (in accordance with FEMA floodproofing standard at 44 CFR

60.3( c)(2)-(3) or successor standard) to the higher of the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure will be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Activities subject to elevation requirements will comply with applicable federal accessibility mandates. The state and its subrecipients will comply with applicable state, local and tribal codes and standards for floodplain management including elevation, setbacks, and cumulative substantial damage requirements.

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

## Flood Insurance Requirements

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

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

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

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

## Construction Standards

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

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

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

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

For rehabilitation of non-substantially damaged residential buildings, Louisiana Office of Community Development-Disaster Recovery Unit will follow the guidelines to the extent applicable as specified in the HUD CPD Green Building Retrofit Checklist. When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Contractors Standards

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

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

The State of Louisiana intends to promote high quality, durable and energy efficient construction methods in affected parishes. All newly constructed buildings must meet all locally adopted building codes, standards

and ordinances as evidenced by final certificate of occupancy. In the absence of locally adopted and enforced building codes that are more restrictive than the state building code, the requirements of the State Building Code will apply. Future property damage will be minimized by incorporating resilience standards through requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

## Preparedness, Mitigation and Resiliency

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

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

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

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

### ADDITIONAL CONSIDERATIONS

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

- The Flood Recovery Strategy emanating from the National Disaster Recovery Framework (NDRF)

- Local Advisory Base Flood Elevations (BFEs) and Flood Insurance Rate Maps (FIRMs);
- State adoption of National Building Code Standards
- The parish Hazard Mitigation Plan required by GOSHEP and the revised 2019 State Mitigation Plan
- Local Long-Term Recovery Resilience Plans (ESF-14)
- An assessment of local land use plans, zoning and floodplain management ordinances and permit requirements
- The Master Plan of the CPRA (as applicable); and
- Regional coordination with the Louisiana Association of Planning Districts (LAPD)

## MITIGATION NEEDS ASSESSMENT

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

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

There have been 90 major disaster declarations in the state of Louisiana since 1954. The most common natural disasters that cause damages to an extent that results in a federal disaster declaration are hurricanes and flooding. Since 2000, there have been 22 declared flood and hurricane-related disasters[1]. This historical pattern of extreme weather is expected to continue and become more severe due to climate change. Based on this, mitigation measures to reduce impacts caused by these types of hazards are critical.

Every parish in the state has been impacted by one or more of these events and has resulted in the devastating loss of life and hardship to Louisiana residents, forcing many to relocate, exhaust their financial assets and undermine the security of living in their homes or investing in their properties or businesses[2].

Repetitive and severe repetitive flood loss properties are particularly costly with claims totaling over $2 billion in Louisiana since 1978. It is important to note that repetitive flood loss properties represent only 1.3 percent of all flood insurance policies but historically account for nearly one-fourth of the claim payments[3]. 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 below[4].

### 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%** |
| Winter Storm | **8** | **0.2** | **9.4%** | **$1.0B-$2.0B** | **0.7%** |
| Freeze | **1** | **0.0** | **1.2%** | **$100M-$250M** | **0.1%** |
| All Disasters | **84** | **2.0** | **100%** | **$200.0B-$270.0B** | **100.0%** |

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

### 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** |
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### NATIONAL FLOOD INSURANCE PROGRAM

Flooding is a problem for many people across the United States. Enduring the consequences of repetitive flooding can put a strain on residents and on state and local resources. When the water rises, communities

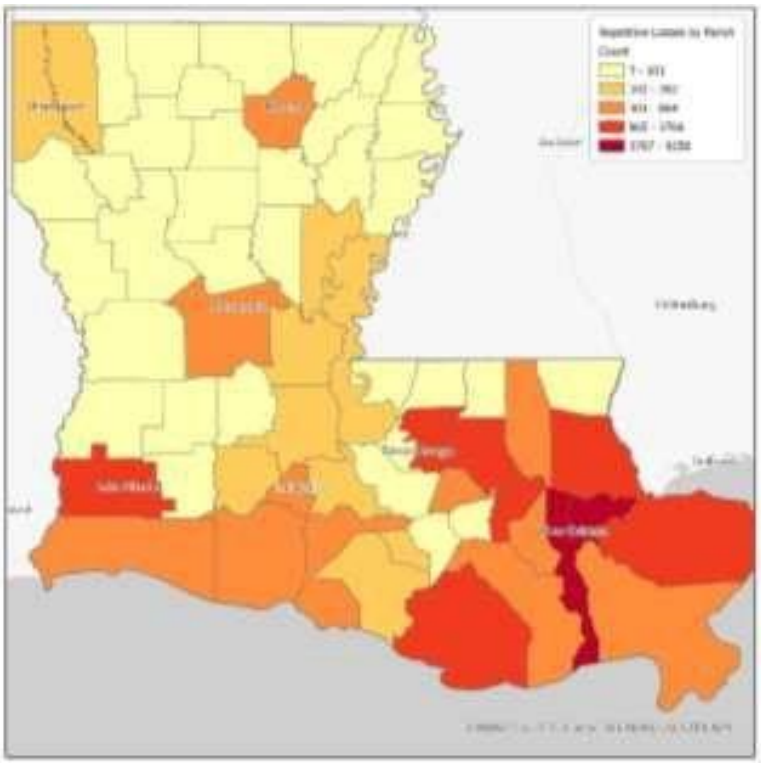
face the disruption of life, damaged belongings, and the high cost of rebuilding. FEMA administers the National Flood Insurance Program, which pays flood claims, while also keeping the price of flood insurance at an affordable level. All parishes in the state of Louisiana participate in the NFIP. As of October 2021, there were 507,929 NFIP policies in force across the state.

### REPETITIVE AND SEVERE REPETITIVE FLOOD LOSS

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

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

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



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

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

## COST OF FUTURE RISKS

To assess future risk, the SHMP utilizes a planning time horizon of 25 years (from a 2017 baseline) and calculates potential impacts of natural hazards in the year 2043. Illustrated in the table below, 2043 annual wind-related losses are the highest projected average in the state, equal to $642,927,351. Flood-related

losses are ranked as the second-highest projected annual loss, equal to $451,389,758 should a 1 percent annual exceedance probability flood event (AEP) occur. Expansive soils are identified as the third most costly projected annual loss, equal to $92,869,675.

Despite the state's extensive efforts to mitigate flood risks following hurricanes Katrina, Rita, Gustav, Ike, Isaac, and the Great Floods of 2016, as well as through long-term efforts like the Coastal Master Plan, losses attributable to a 1 percent AEP flood event will account for more than one-third of all anticipated disaster losses in 2043[6]. 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** |
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| Dam Failure | **$1,011,414** | | **$1,011,414** |
| Extreme Heat | **$-** | **$744,345** | **$744,345** |
| Sinkhole | **$342,071** | | **$342,071** |

### GREATEST RISK HAZARDS

The Louisiana GOHSEP Hazard Identification and Risk Assessment (2018 HIRA) ranks local floods as the highest risk to the state based on consideration of consequence, vulnerability, threat, and risk factors. This

threat is followed closely by severe thunderstorms, wide-area floods, tornados, and hurricanes. Based on the SHMP and local hazard mitigation plans, both HUD and LA MID areas share a collective greatest risk profile that includes wind and flood hazards, which are compounded by the effects of subsidence and sea-level rise. This section addresses quantitative and qualitative descriptions of these hazards and their projected current and future risk to MID areas and the State of Louisiana.

### HURRICANES/TROPICAL CYCLONES

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

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

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

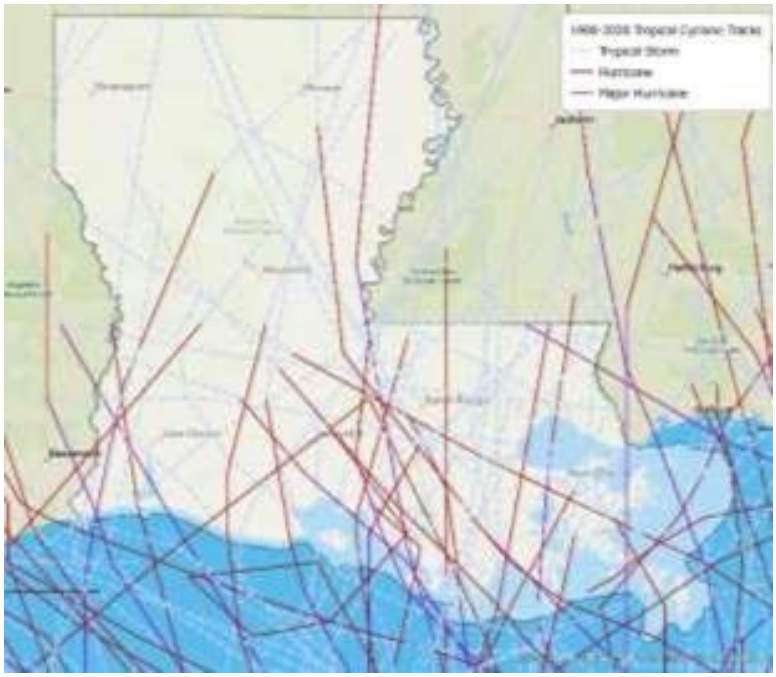

*Figure: Tropical Cyclone Tracks Across Louisiana (1900-2020)*

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

## FLOODS

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

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

While projected changes for riverine flooding are still being developed through the Louisiana Water Initiative's watershed monitoring, mapping and modeling program, the CPRA modeling predicts increases in coastal flooding illustrated in the figure below which captures a medium environmental scenario with no mitigation action in 2043 with the current 100-year flood depths. This map represents the flood hazard we could expect to see in the year 2043. The figure below provides a more detailed coastal flood risk projection for 2067 if no action is taken. As noted in NCA4 (2017), projection of the flood hazard to 2050 is a complex multivariate problem, as human activities such as deforestation, urban and floodplain development, construction of dams, flood mitigation measures, and changes in agricultural practices impact future flood statistics.

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

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

Despite the fact that these complications invite caution in the interpretation of results, it is safe to conclude that flood is likely to remain HUD and LA MID's and the entire state's costliest, most ubiquitous, and most life-threatening hazard. This is because floods are the by-product of several other hazards including thunderstorms, tropical cyclones, coastal hazards, dam failure, and levee failure.

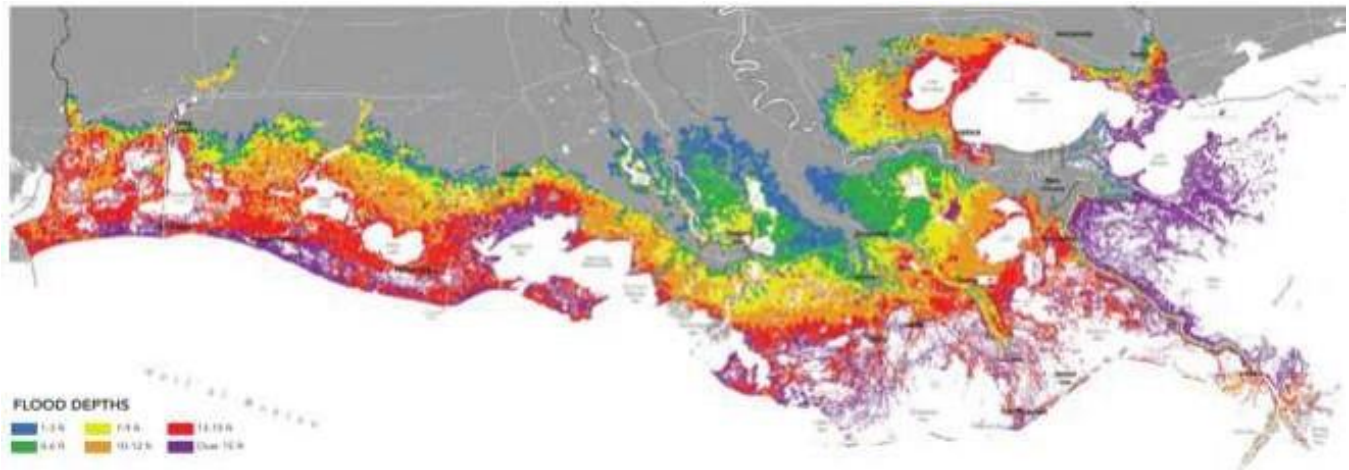


*Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action*
*Source: http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_CFinal-with-Effective- Date-06092017.pdf*

## 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 world7. This steadily increasing threat further exacerbates flood risk within the state, as it multiplies the potential impacts of any isolated flood event and contributes to an ever-worsening baseline state of flood risk exposure[8].

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.

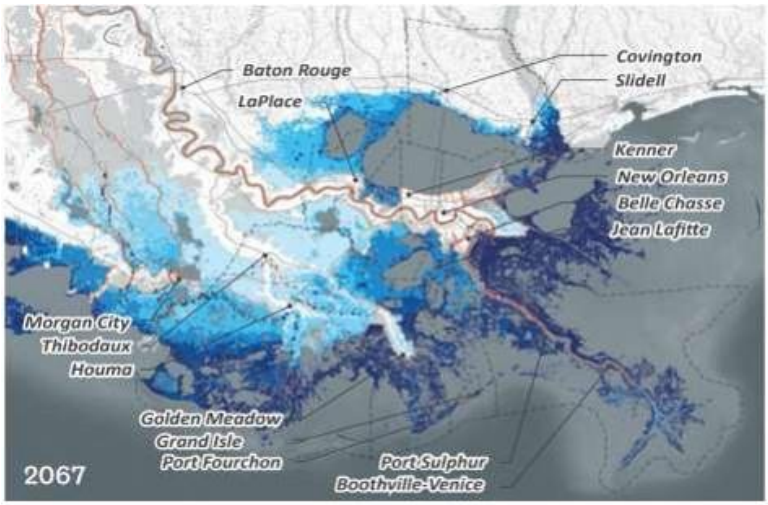


*Figure: 2067 Coastal Flood Risk Projections (No Action)*
*Source: https://s3.amazonaws.com/lasafe/Final+Adaptation+Strategies/Regional+Adaptation+Strategy.pdf*

### *Extreme Precipitation*

Extreme precipitation precedes flash flooding, which is a critical component of Louisiana's risk profile9 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 variability10, 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 Midwest11 that can pose an elevated threat when combined with extreme precipitation or wind events. Because of its flat landscape and interconnected waterways, the impact of a rainfall event in one part of the state can be greatly felt far beyond the boundaries of where the rain falls.

*Figure: Louisiana Average Annual Rainfall Distribution*

Louisiana has experienced a number of historic storms and rainfall events with high damage levels in the past two decades, but these events are not outliers from a historical perspective. In fact, such events may speak to existing trends in rainfall data and flood risk. Since 1958, the amount of precipitation falling during heavy rainstorms has increased by 27 percent in the southeast, and the trend toward increasingly heavy and frequent rainstorms, including a significant increase in extreme precipitation events, is projected to continue with high confidence[12]. 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.

# SUBSTANTIAL AMENDMENT NO. 1

## 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
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### *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

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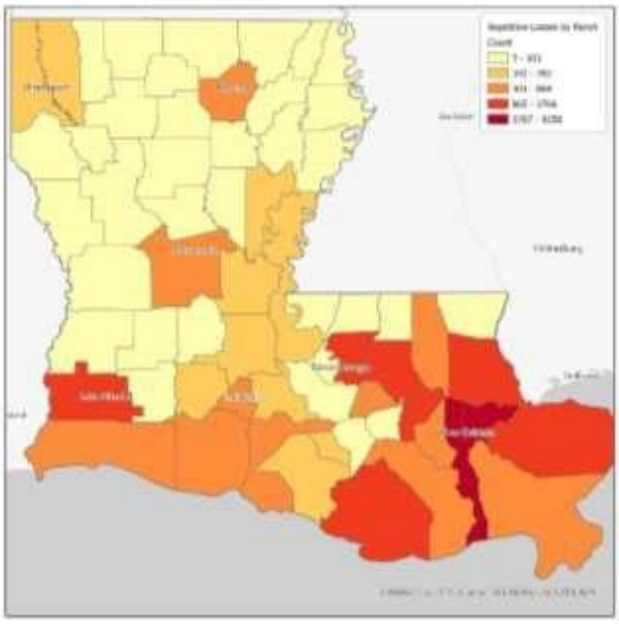

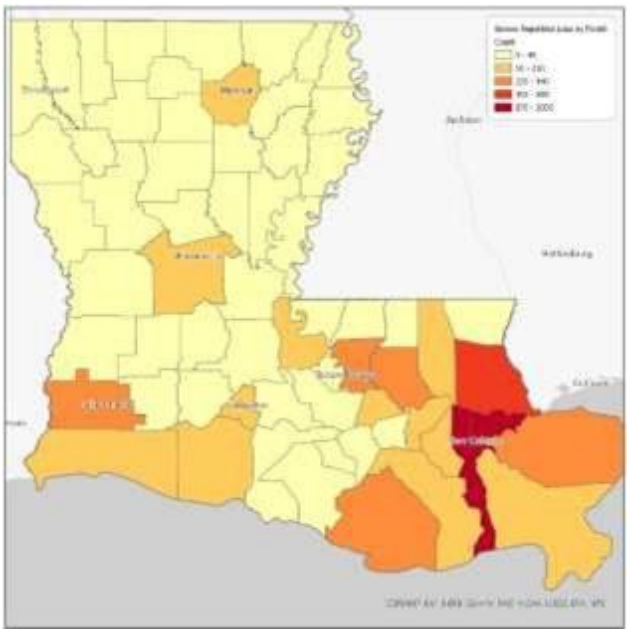

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| Extreme Heat | **$-** | **$744,345** | **$744,345** |

### *Greatest Risk Hazards*

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

### *Hurricanes/Tropical Cyclones*

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

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

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

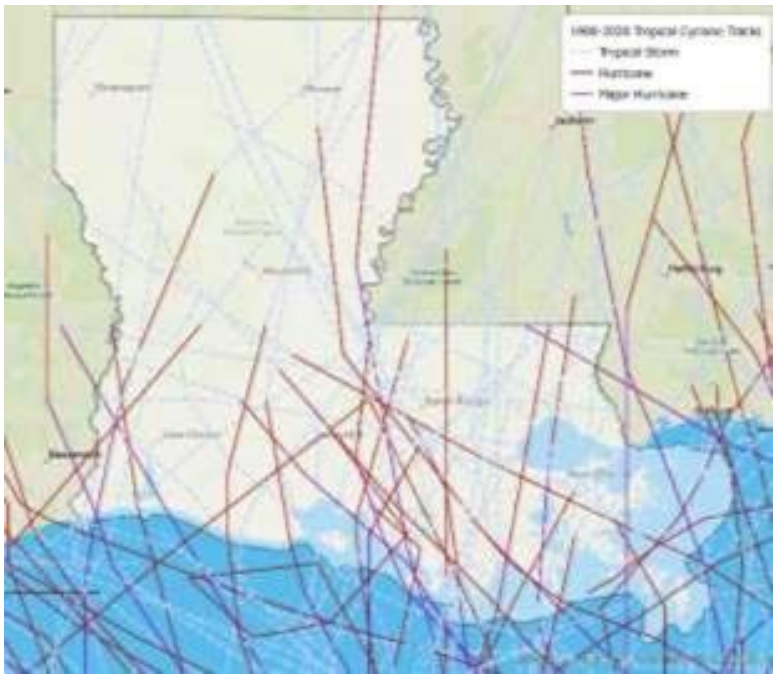

*Figure: Tropical Cyclone Tracks Across Louisiana (1900-2020)*

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

### *Floods*

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

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

While projected changes for riverine flooding are still being developed through the Louisiana Water Initiative's watershed monitoring, mapping and modeling program, the CPRA modeling predicts increases in coastal flooding illustrated in the figure below which captures a medium environmental scenario with no mitigation action in 2043 with the current 100-year flood depths. This map represents the flood hazard we could expect to see in the year 2043. The figure below provides a more detailed coastal flood risk projection for 2067 if no action is taken. As noted in NCA4 (2017), projection of the flood hazard to 2050 is a complex multivariate problem, as human activities such as deforestation, urban and floodplain development, construction of dams, flood mitigation measures, and changes in agricultural practices impact future flood statistics.

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

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

Despite the fact that these complications invite caution in the interpretation of results, it is safe to conclude that flood is likely to remain HUD and LA MID's and the entire state's costliest, most ubiquitous, and most life-threatening hazard. This is because floods are the by-product of several other hazards including thunderstorms, tropical cyclones, coastal hazards, dam failure, and levee failure.

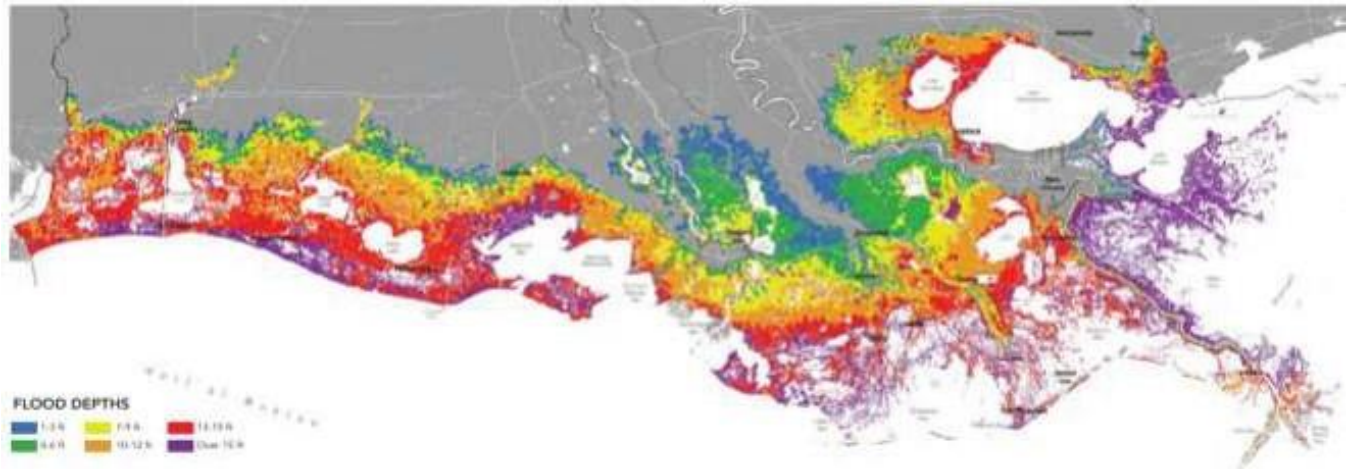


*Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action*
*Source: [http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_CFinal-with-Effective-_Date-06092017.pdf](http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_CFinal-with-Effective-_Date-06092017.pdf)*

### *Sea Level Rise*

Due to a variety of factors including eustatic sea-level rise, subsidence, and coastal land loss, Louisiana has one of the highest sea-level rise rates in the world[7]. This steadily increasing threat further exacerbates flood risk within the state, as it multiplies the potential impacts of any isolated flood event and contributes to an ever-worsening baseline state of flood risk exposure[8].

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.

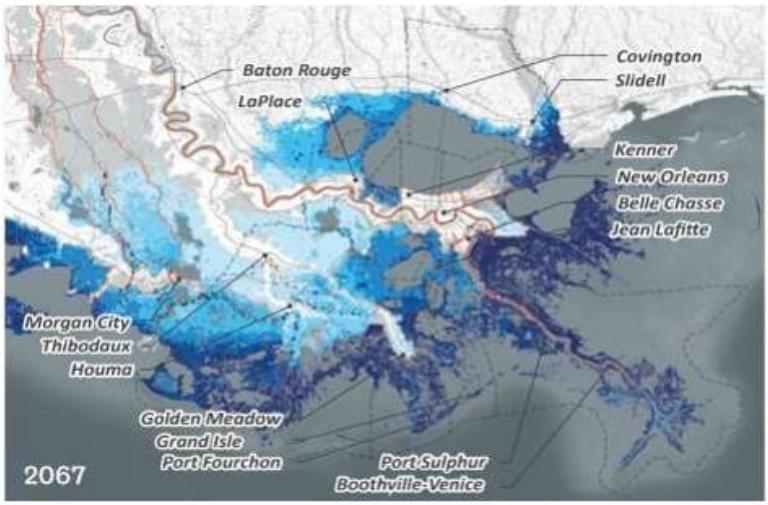


*Figure: 2067 Coastal Flood Risk Projections (No Action)*
*Source: https://s3.amazonaws.com/lasafe/Final+Adaptation+Strategies/Regional+Adaptation+Strategy.pdf*

### *Extreme Precipitation*

Extreme precipitation precedes flash flooding, which is a critical component of Louisiana's risk profile[9] and can occur with little warning, exhausting municipal resources and causing repeated property damage and business interruption.

Louisiana experiences some of the highest rainfall rates in the country on an average statewide basis, with a high degree of spatial variability[10], with some areas in the state reaching as high as 70- inches of mean annual rainfall. Even in drought or La Niña conditions, Louisiana is often subject to high water levels in its major riverine systems, due to flooding conditions upstream in the Midwest[11] that can pose an elevated threat when combined with extreme precipitation or wind events. Because of its flat landscape and interconnected waterways, the impact of a rainfall event in one part of the state can be greatly felt far beyond the boundaries of where the rain falls.

*Figure: Louisiana Average Annual Rainfall Distribution*

Louisiana has experienced a number of historic storms and rainfall events with high damage levels in the past two decades, but these events are not outliers from a historical perspective. In fact, such events may speak to existing trends in rainfall data and flood risk. Since 1958, the amount of precipitation falling during heavy rainstorms has increased by 27 percent in the southeast, and the trend toward increasingly heavy and frequent rainstorms, including a significant increase in extreme precipitation events, is projected to continue with high confidence[12]. 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:

- 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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

# 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 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

## A. PROGRAM BUDGET

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

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

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

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

All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities to ensure compliance with the minimum 15% mitigation funding. In addition to

implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses and provide for non-federal match for both FEMA PA and HMGP. This is necessary to support a more robust recovery effort. Failing to address these additional needs would neglect the interdependent nature of Louisiana's disaster affected communities. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure and planning programs.

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

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

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

All programs will be implemented by the State of Louisiana at this time. The state may work with subrecipients or other agencies in the future to deliver recovery efforts. Depending on a continued assessment of unmet needs, mitigation needs, and additional funding, the state may allocate funds to

parishes or other subrecipients through future substantial Action Plan Amendments. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

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

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

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

## HOUSING

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

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

The state has also prioritized providing affordable rental housing and other housing assistance for persons displaced by the storms through the rehabilitation, reconstruction and creation of new rental housing stock,

the creation of homeownership opportunities, and by providing rental assistance and support services to vulnerable persons displaced by the storms. The following programs are proposed:

- Rental Restoration and Development Program
- Middle-Market Loan Program
- Resilient Mixed-Income Gap Funding Program
- Permanent Supportive Housing Program
- Rapid Rehousing Program

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

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

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

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

The following are ineligible activities.

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

## ECONOMIC REVITALIZATION

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

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

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

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

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

### INFRASTRUCTURE

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

### PLANNING

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

# SUBSTANTIAL AMENDMENT NO. 1

## 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:

- Rental Restoration and Development 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 foods consumed directly or indirectly by local residents. In order to ensure these businesses remain viable and resilient in the face of future disasters, the state may provide technical assistance and mitigation support to the impacted businesses, which may include but not be limited to: training to develop a business continuity plan or institute better recordkeeping, accounting and inventory practices; resources to assess

flood risk for the business location; information on securing generator hookups and other similar measures. The state has prioritized businesses that experienced physical or financial losses as a result of the disaster and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

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

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

## SUBSTANTIAL AMENDMENT NO. 3

### OVERVIEW

*Louisiana Office of Community Development - Disaster Recovery Unit* is the lead agency and responsible entity for administering Continuing Appropriations Act, 2023 (PL 117-180) in CDBG-DR funds allocated for disaster recovery.

The state will dedicate this allocation of $831.5 million to address identified unmet needs programs as outlined in Substantial Amendment No. 1.

These funds will be dedicated to existing programs identified within the Program Detail's section of this Action Plan. In addition, two new Housing programs and one Infrstructure Program have been added in the Program Detail's Section of this Action Plan.

LOUISIANA Office of COMMUNITY DEVELOPMENT

## Program Budget - 2020

| | PROGRAM | BUDGET | HUD IDENTIFIED MID BUDGET | GRANTEE IDENTIFIED MID BUDGET | % OF ALLOCATION | MAXIMUM AWARD | NATIONAL OBJECTIVE | ESTIMATED OUTCOME |
|---|---|---|---|---|---|---|---|---|
| HOUSING | Rehab | $250,000,000.00 | $200,000,000.00 | $50,000,000.00 | 23.80% | $0.00 | Low- and moderate-income or Urgent Need | 0 |
| | Buyout | $10,000,000.00 | $8,000,000.00 | $2,000,000.00 | 0.95% | $0.00 | Low- and moderate-income or Urgent Need | 0 |
| | New Construction | $455,078,744.00 | $364,062,996.00 | $91,015,748.00 | 43.33% | $0.00 | Low- and moderate-income or Urgent Need | 0 |
| | Other | $6,500,000.00 | $5,200,000.00 | $1,300,000.00 | 0.62% | $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 | 0 |
| | Business Grants | $100,455,482.00 | $80,364,386.00 | $20,091,096.00 | 9.56% | $50,000.00 | Low- and moderate-income or Urgent Need | 0 |
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| INFRASTRUCTURE | Water/sewer Improvements | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Health Facilities | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Other | $185,232,774.00 | $148,186,219.00 | $37,046,555.00 | 17.64% | $0.00 | Low- and moderate-income or Urgent Need | 0 |
| PUBLIC SERVICES | Legal Services | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Housing Counseling | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| MITIGATION | Mitigation | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |

| | PROGRAM | BUDGET | HUD IDENTIFIED MID BUDGET | GRANTEE IDENTIFIED MID BUDGET | % OF ALLOCATION | MAXIMUM AWARD | NATIONAL OBJECTIVE | ESTIMATED OUTCOME |
|---|---|---|---|---|---|---|---|---|
| ADMIN | Admin | $41,900,000.00 | $33,520,000.00 | $8,380,000.00 | 3.99% | $0.00 | Low- and moderate-income or Urgent Need | 0 |
| PLANNING | Planning | $1,100,000.00 | $880,000.00 | $220,000.00 | 0.10% | $0.00 | Low- and moderate-income or Urgent Need | 0 |

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

## Program Budget - 2021

| | PROGRAM | BUDGET | HUD IDENTIFIED MID BUDGET | GRANTEE IDENTIFIED MID BUDGET | % OF ALLOCATION | MAXIMUM AWARD | NATIONAL OBJECTIVE | ESTIMATED OUTCOME |
|---|---|---|---|---|---|---|---|---|
| HOUSING | Rehab | $425,000,000.00 | $340,000,000.00 | $85,000,000.00 | 20.20% | $0.00 | Low and moderate income0 | 0 |
| | Buyout | $130,000,000.00 | $104,000,000.00 | $26,000,000.00 | 6.18% | $0.00 | Low and moderate income | 0 |
| | New Construction | $786,800,187.00 | $629,440,150.00 | $157,360,037.00 | 37.40% | $0.00 | Low and moderate income | 0 |
| | Other | $55,000,000.00 | $44,000,000.00 | $11,000,000.00 | 2.61% | $0.00 | Low and moderate income | 0 |
| ECONOMIC REVITALIZATION | Workforce Training | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Business Grants | $45,695,232.00 | $36,556,186.00 | $9,139,046.00 | 2.17% | $0.00 | Low and moderate income | 0 |
| | Other | $165,000,000.00 | $132,000,000.00 | $33,000,000.00 | 7.84% | $0.00 | Low and moderate income | 0 |
| IN FR AS | Water/sewer Improvements | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |

| | PROGRAM | BUDGET | HUD IDENTIFIED MID BUDGET | GRANTEE IDENTIFIED MID BUDGET | % OF ALLOCATION | MAXIMUM AWARD | NATIONAL OBJECTIVE | ESTIMATED OUTCOME |
|---|---|---|---|---|---|---|---|---|
| | Health Facilities | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Other | $402,883,641.00 | $322,306,913.00 | $80,576,728.00 | 19.15% | $0.00 | Low and moderate income | 0 |
| PUBLIC SERVICES | Legal Services | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Housing Counseling | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| MITIGATION | Mitigation | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | 0 | 0 |
| ADMIN | Admin | $91,468,940.00 | $0.00 | $0.00 | 4.35% | $0.00 | Low and moderate income | 0 |
| PLANNING | Planning | $2,000,000.00 | $0.00 | $0.00 | 0.10% | $0.00 | Low and moderate | 0 |

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

## Connection to Unmet Needs

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

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

At least 70 percent of all program funds will benefit LMI persons or households. As most of the programs submitted in the action plan are either limited to benefitting LMI persons or prioritize assisting LMI persons

in accessing programs, the state anticipates meeting the requirement. The state will also be assessing the status of eligible unmet needs of LMI persons and non-LMI persons and determining, at an appropriate stage, whether to request a modification of the requirement.

# SUBSTANTIAL AMENDMENT NO. 1

## 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 Hurricanes Laura and Delta.

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

#### *Economic Development*

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

#### *Infrastructure*

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

#### *Mitigation*

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

## Distribution of Funds

All programs will be implemented by the State of Louisiana at this time unless noted otherwise in the respective program descriptions. Depending on a continued assessment of unmet needs, mitigation needs, and additional funding, the state may allocate funds to parishes or other subrecipients through future

substantial Action Plan Amendments. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

## CONNECTION TO UNMET NEEDS

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

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

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

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

Hurricanes Laura and Delta caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state’s review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than $510 million. The need for safe, decent, and affordable housing is the state’s top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described above. Approximately 50 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating,

and elevating homes as well as 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 and provide for non-federal match for both FEMA PA and HMGP. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure, and planning programs.

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

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

# SUBSTANTIAL AMENDMENT NO. 1

## 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.

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 and closing cost of housing-related projects. The state will also work with non-governmental entities working to fund housing recovery through short-term, private and philanthropic loan funds intended to jump-start critical housing recovery programs for at-risk populations.

## Resale or Recapture

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

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

The transfer of the property during these periods can result in a repayment obligation to the state. Similarly, failure to comply with the obligations of the particular program, including but not limited to

completion of project/placement into service, expenditure of funds, compliance with federal and state laws, regulations, program requirements, and meeting the housing obligation associated with the program; can result in a default of the obligation to the state and consequences of repayment of outstanding amounts and/or foreclosure on the property.

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

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

# B. PROGRAM DETAILS

## Housing Program

### FMA-SWIFT (NON-FEDERAL SHARE MATCH)

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET |
|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$3,000,000.00** | **$3,000,000.00** |
| Child | **B-22-DF-22-0001** | **$3,000,000.00** | **$3,000,000.00** |

*Narratives*

- **Program Description**
  - **APA #2 REVISION:**

    Investments in flood hazard risk mitigation activities in our MID areas helps to address repetitive losses for our disadvantaged LMI communities. These communities, when faced with repetitive loss, find it difficult to rebuild. 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 allocate funds to be used for individual flood mitigation projects that mitigate the risk of flooding to individual NFIP-insured structures that are SRL, RL, or are structures that have been deemed Substantially Damaged after August 26, 2021.
- **Program Tieback to Disaster/Unmet Needs**
  - This program addresses the unmet need for required non-federal match for all awarded FY22 FMA (Flood Mitigation Assistance) SWIFT current grants in the eligible MIDs.
- **How Program will Promote Housing for Vulnerable Populations**
  - The FMA Program aims to promote equity and delivery of these funds in line with the Justice 40 initiative. In implementing the Justice 40 initiative, the program is prioritizing assistance that benefits disadvantaged communities.
- **Program Definition of Second Home/Eligibility**
  - Not applicable

- **Program National Objective(s)**
  - Urgent Need Mitigation
  - LMI
- **Program Eligibility**
  - **Eligible Activity**: Non-federal share 105(a)(9)
- **Program Responsible Entity**
  - State of Louisiana or its sub-recipient(s)
- **Program Maximum Assistance**
  - The maximum award is $1,000,000.00
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be January 1, 2023 – 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
    - Tribal governments
- **Program Competitive Application Overview (if applicable)**
  - Eligible FY 22 FMA Swift Current projects with local cost-share requirements selected with a Notice of Funding Opportunity and approved by the Department of Homeland Security (DHS) will be funded with this program.
- **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. The state will develop a prioritization or proration methodology for disbursing funds to state agencies, local governments, and local nonprofit organizations. The state may prioritize activity type and/or create a funding threshold.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
  - Reducing the risk of future flooding damage to existing buildings.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**
  - 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.

## FLOOD INSURANCE PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$1,500,000.00** | **$1,200,000.00** | **$300,000.00** |
| Child | **B-21-DF-22-0001** | **$1,000,000.00** | **$800,000.00** | **$200,000.00** |
| Child | **B-21-DZ-22-0001** | **$500,000.00** | **$400,000.00** | **$100,000.00** |

### *Narratives*

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

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

    RLHP will work to provide financial guidance to impacted homeowners as well as counseling, to enable them to understand the need and process for budgeting for flood insurance premiums in perpetuity. Furthermore, the state will issue communications and public service advisories reminding homeowners of their responsibility to maintain flood insurance on properties located in areas where federal assistance was received. The state will notify all property owners

receiving disaster assistance that are required to purchase and maintain flood insurance of the statutory obligation to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and that they, as the transferring owner, may be liable if they fail to do so.

- **Program Tieback to Disaster/Unmet Needs**
  - This program is only available to applicants who sustained damage to their home as a result of Hurricanes, Laura, Delta, 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**: Benefits to low and moderate income (LMI) persons or households.
- **Program Eligibility**
  - **Eligible Activity:** HCDA Sections 105(a)(4)
  - **Geographic Eligibility**: FEMA IA declared parishes for Hurricanes, Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **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**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - **Maximum Award**: One-year term flood insurance premium not to exceed $2,000.
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

- **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.

## HOUSING BUYOUTS

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET |
|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$100,000,000.00** | **$80,000,000.00** |
| Child | **B-22-DF-22-0001** | **$100,000,000.00** | **$80,000,000.00** |

### *Narratives*

- **Program Description**
  - **APA #2 REVISION:**

    The state will conduct large-area buyouts of repetitive loss properties (on the block or neighborhood scale) for families within repetitive loss areas, areas subject to moderate or high flood risk and/or within FEMA designated floodways. The MIT-Buyout Program is currently oversubscribed, and the state wishes to provide additional flood mitigation from future events in these FEMA designated floodway areas in the affected parishes. Repetitive Loss Properties that are acquired through program buyouts will be restored to natural floodplain conditions.
- **Program Tieback to Disaster/Unmet Needs**
  - Louisiana is facing increased risk, in both magnitude and frequency, of flood events which is an identified hazard in the Mitigation Needs Assessment.
- **How Program will Promote Housing for Vulnerable Populations**
  - The program would target benefits to vulnerable communities that experience repetitive loss and are subject to the potential large-scale relocation via buyout. This program will eliminate this risk by buying out these properties and allowing residents to relocate out of the floodway.
- **Program Affordability Period (if applicable)**
  - Not applicable
- **Program National Objective(s)**
  - Benefit to low- and moderate-income persons or households
  - Urgent Need Mitigation
- **Program Eligibility**
  - **Eligible Activity**: HCDA Sec. 105(a) (1), 105(a) (4), 105(a) (7), 105(a) (11).

- **Program Responsible Entity**
  - State of Louisiana or its sub-recipient(s)
- **Program Maximum Assistance**
  - The maximum award is $25,000,000.00.
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be July 1, 2023 – 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
    - Tribal governments
- **Program Competitive Application Overview (if applicable)**
  - Buyout program awards will be administered in a manner that prioritizes benefit to low- and moderate- income households that produce measurable reductions in residents' exposure to flood risk.
- **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 voluntary buyouts. The state will offer and conduct large-area voluntary buyouts as an allowable mitigation activity (on the block or neighborhood scale) for residents who own property located in repetitive loss areas, areas within FEMA designated floodways, and/or areas subject to moderate or high flood risk. Such buyout programs will include provisions for community-oriented assistance to homeowners in order to facilitate a successful transition to a location of lower flood risk outside of SFHAs.
- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
  - This program will promote storm water management by restoring the properties to their natural floodplain conditions to enhance the storage and ecosystem capacity of the land.

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (if applicable)**
  - Louisiana is facing increased risk, in both magnitude and frequency, of flood events. This risk threatens the residents who live in the FEMA designated floodways. The program would target benefits to vulnerable communities that experience repetitive loss and are subject to the potential large-scale relocation via buyout. This program will eliminate this risk by buying out these properties and allowing residents to relocate out of the floodway.

## INTERIM HOUSING ASSISTANCE

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET |
|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$6,000,000.00** | **$4,800,000.00** |
| Child | **B-21-DF-22-0001** | **$3,000,000.00** | **$2,400,000.00** |
| Child | **B-21-DZ-22-0001** | **$1,000,000.00** | **$800,000.00** |
| Child | **B-22-DF-22-0001** | **$2,000,000.00** | **$1,600,000.00** |

### *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 Hurricanes Laura, Delta, 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 Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **Eligible Applicants, Criteria for Selection and Method of Distribution:**
    - RLHP applicants determined by the program to meet the LMI national objective, or who are up to 80 percent AMI, who have not completed the repairs and/or reconstruction of their damaged homes.
    - Applicant must be eligible recipients of CDBG-DR grant funds in the RLHP.
    - Applicant must actively participate in the program, and demonstrate progress toward completing their recovery.
    - Applicant must agree to sign a RLHP Grant Agreement for the interim housing assistance, committing to the terms of receiving the interim housing benefit and completing the eligible repair activities outlined in an inspection report and identified on the Estimated Cost to Repair (ECR) report.

- **Program Responsible Entity**
  - **Administering Entity**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - **Mortgage and/or Rental Assistance:** On a monthly basis, up to a) the lesser of the mortgage house payment or additional interim housing cost incurred for up to 20 months or b) the maximum 2022 fair market rents based on the household size, for up to 20 months (pending waiver to extend). Based on such factors as the percentage of adjustment and the administrative burden of making programmatic adjustments mid-way through a program, the state may adjust the maximum amount per month a household is eligible to receive if or when HUD published fair market rents are adjusted.
  - **Temporary Hotel Assistance:** The maximum amount is based on state limits, detailed in PPM 49: https://www.doa.la.gov/Pages/osp/Travel/TravelPolicy.aspx. The appropriate number of rooms will be provided based on family size. Hotel assistance is limited to the earlier of when the repairs or reconstruction is complete or an estimated 90 days. Extensions to this time limit will be considered on a case-by-case basis, when there are exigent circumstances. Some may transition from hotel to interim rental or mortgage assistance, but in no case will recipients receive more than 20 months of assistance.
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **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.

## MIDDLE-MARKET LOAN PROGRAM (MMLP)

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$60,000,000.00** | **$48,000,000.00** | **$12,000,000.00** |
| Child | **B-21-DF-22-0001** | **$30,000,000.00** | **$24,000,000.00** | **$6,000,000.00** |
| Child | **B-21-DZ-22-0001** | **$30,000,000.00** | **$24,000,000.00** | **$6,000,000.00** |

### *Narratives*

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

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

    Projects funded through MMLP will require OCD standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana's affordable housing industry.
- **Program Tieback to Disaster/Unmet Needs**
  - The Middle Market Loan Program (MMLP) will develop affordable rental housing units to address the impact of the disasters in reducing the supply of affordable housing and increasing the demand for housing stock.
- **How Program will Promote Housing for Vulnerable Populations**
  - The Middle-Market Loan Program (MMLP) will directly serve the LMI population.
- **Program Affordability Period (if applicable)**
  - Minimum 20 years
- **Program Definition of Second Home/Eligibility**

- Not applicable

- **Program National Objective(s)**
  - **National Objective**: Benefits to low- and moderate-income persons
- **Program Eligibility**
  - **Eligible activity**:
    - Acquisition of Real Property, HCDA Sections 105 (a)(1)
    - Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)
    - New Housing Construction Waiver, as identified in Federal Register Docket No. 6303-N-1
  - **Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **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
  - **APA #2 REVISION:**

    **Administering Entity**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - $6 Million
  - **APA #2 REVISION:**

    $15 Million
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.

- **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.

## PERMANENT SUPPORTIVE HOUSING PROGRAM (PSHP)

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$31,000,000.00** | **$24,800,000.00** | **$6,200,000.00** |
| Child | **B-21-DF-22-0001** | **$6,000,000.00** | **$4,800,000.00** | **$1,200,000.00** |
| Child | **B-21-DZ-22-0001** | **$5,000,000.00** | **$4,000,000.00** | **$1,000,000.00** |
| Child | **B-22-DF-22-0001** | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |

### *Narratives*

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

    PSHP achieves these outcomes in two ways:

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

    This approach emphasizes the long-term resilience of both the individuals who benefit from supportive housing and the institutional networks that serve them.
- **Program Tieback to Disaster/Unmet Needs**
  - The PSHP is coupled with multifamily affordable housing programs in addressing the direct and indirect impacts of the disasters on affordable housing within the MIDs, increasing the scope of the tenants which those programs can serve.
- **How Program will Promote Housing for Vulnerable Populations**

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

- **Program Affordability Period (if applicable)**
  - Not applicable
- **Program Definition of Second Home/Eligibility**
  - Not applicable
- **Program National Objective(s)**
  - **National Objective**: Benefits to low and moderate (LMI) income persons or households
- **Program Eligibility**
  - **Eligible Activity:** HCDA. Sec.105(a)(8), 105(a)(11)
  - **Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **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 Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **Program Competitive Application Overview (if applicable)**
  - Not applicable
- **Program Method of Distribution Description/Overview (if applicable)**
  - Funding will be through payment to service providers through presentation by landlord of vouchers or by direct reimbursement to landlords, as per program policies.

## RAPID REHOUSING PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$25,000,000.00** | **$20,000,000.00** | **$5,000,000.00** |
| Child | **B-21-DF-22-0001** | **$10,000,000.00** | **$8,000,000.00** | **$2,000,000.00** |
| Child | **B-21-DZ-22-0001** | **$5,000,000.00** | **$4,000,000.00** | **$1,000,000.00** |
| Child | **B-22-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 Hurricanes Laura, Delta, 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 Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms
  - **Eligible Applicants**: Eligible applicants are homeless or facing housing instability and lack the necessary resources and or support networks to obtain housing.
- **Program Responsible Entity**
  - **Administering Entity**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - $1,000 per month, maximum $12,000 per year
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **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.

## RENTAL RESTORATION AND DEVELOPMENT (RRDP)

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$40,000,000.00** | **$32,000,000.00** | **$8,000,000.00** |
| Child | **B-21-DF-22-0001** | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |
| Child | **B-21-DZ-22-0001** | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |

### *Narratives*

- **Program Description**
  - The Neighborhood Landlord Rental Program will offer funding for applicants to rehabilitate existing housing units or construct new affordable housing units. NLRP will also revitalize communities impacted by Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms by reducing the blight of damaged properties as it redevelops them into affordable rental housing.
  - **APA #2 REVISION:**

    The Rental Restoration and Development Program (RRDP) will offer funding for applicants to rehabilitate existing housing units or construct new affordable housing units. RRDP will also revitalize communities impacted by Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms by reducing the blight of damaged properties as it redevelops them into affordable rental housing.

    *This modification is specific to a name change only from Neighborhood Landlord Rental Program to the Rental Restoration and Development Program (RRDP). The program design, implementation and administration will remain the same as it was for NLRP. There were 3 rounds of NLRP for the Floods of 2016 grant with NLRP III launched in 2022. The name change is specific to allow better communication with grantees without causing confustion about unique grants*.
- **Program Tieback to Disaster/Unmet Needs**
  - The Rental Restoration and Development Program (RRDP) assists landlords with loans for rehabilitation or reconstruction of damaged rental properties as a direct result of Hurricanes Laura, Delta, 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. 6303-N-01
  - **Geographic Eligibility**: FEMA IA declared parishes for Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **Eligible Applicants**: Eligible applicants include any public, private, for-profit, or non-profit entity which owns the subject property at the time of application.
- **Program Responsible Entity**
  - **Administering Entity**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - **Maximum Award**: $725,000 (additional cap on number of units)
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **Program Competitive Application Overview (if applicable)**

- Awards will be made to qualified applicants based on the score during the competitive round of funding and thereafter upon submission of eligible, completed applications.
- Specific scoring criteria will be outlined in the program guidelines.
- Applicants must own the unit and have clear title to the property for which they are applying at the time of application.
- Each project will be reviewed for ownership, title issues, duplication of benefits, financial feasibility, and cost reasonableness.
- Applications must be for only one property; however, developers may submit multiple applications.
- Properties must be located outside of a Special Flood Hazard Area (SFHA).
- Preference will be given to for-profit applicants that were property owners at the time of the hurricanes. Applicants who acquired property after Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Stormsare 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)**
  - RRDP 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.

## RESILIENT MIXED INCOME GAP FUNDING PROGRAM (PRIME)

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$1,146,878,931.00** | **$917,503,146.00** | **$229,375,785.00** |
| Child | **B-21-DF-22-0001** | **$407,873,287.00** | **$326,298,630.00** | **$81,574,657.00** |
| Child | **B-21-DZ-22-0001** | **$355,078,744.00** | **$284,062,996.00** | **$71,015,748.00** |
| Child | **B-22-DF-22-0001** | **$383,926,900.00** | **$307,141,520.00** | **$76,785,380.00** |

### *Narratives*

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

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

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

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

- Provides affordable multifamily rental developments which addresses the current lack of affordable rental units as a direct and indirect result of Hurricanes Laura, Delta, 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 Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **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.
  - **APA #2 REVISION:**

    Maximum award $20 million with no per unit cap.

- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **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.

## RESTORE LOUISIANA HOMEOWNER PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$680,000,000.00** | **$544,000,000.00** | **$136,000,000.00** |
| Child | **B-21-DF-22-0001** | **$380,000,000.00** | **$304,000,000.00** | **$76,000,000.00** |
| Child | **B-21-DZ-22-0001** | **$300,000,000.00** | **$240,000,000.00** | **$60,000,000.00** |

### *Narratives*

- **Program Description**
  - The Restore Louisiana Homeowner Program (RLHP) will provide critical support to homeowners impacted by Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms. 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 payoffsFunding 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 Hurricanes Laura, Delta, 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:

**RESTORE LOUISIANA**
Homeowner Assistance Program

**Based on current funding limitations and federal guidance, to be placed in a phase, you must have:**

(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

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

AMI = AREA MEDIAN INCOME

- **Program Affordability Period (if applicable)**
  - Not applicable in a Homeowner Program
- **Program Definition of Second Home/Eligibility**
  - Second Homes are not eligible in the Restore Homeowner Program. Only homes damaged by the allocated disasters which served as the primary residence of the homeowner are considered for eligibility.
- **Program National Objective(s)**
  - **National Objective**: Benefits to Low- and moderate-income persons/households or Urgent need.
  - The Restore Louisiana Homeowner program assists homeowner who are LMI as a priority. However, the State recognizes many homeowners significantly impacted by a disaster may not have been LMI, but are at risk of becoming so following the disaster. Some homeowners still have unmet needs that are best served using the Urgent Need national objective. In the midst of the Nation's COVID 19 Pandemic it is urgent to consider the goal for homeowners who recover to expeditiously move back into their single-family homes. Not using the urgent need national objective creates great risk of health and welfare of these

communities. There is an increased risk of homelessness. Additionally, homeowners whose only choice is to shelter with friends and other family members only increases the potential risk of exposure to this deadly COVID virus. In order for the economy to recovery and for the overall welfare of the community, housing recovery must be the priority for all impacted families. There is a sense of urgency to complete stronger and more resilient homes to protect the communities against future storms. As Louisiana enters the 2022 hurricane season, it is both critical and urgent to ensure families have the resources necessary to recover, rebuild and reside in their homes preventing the need for concurrent sheltering that could result from another impending disaster. The quicker these programs have the ability to serve the community, the greater the mitigation from future disasters, along with reducing the risk of exacerbating community heath and welfare issues.

- **Program Eligibility**
  - **Eligible Activity:** Rehabilitation, Reconstruction, Reimbursement, Elevation, Buyouts and Acquisitions (42 U.S.C. 5305(a)(4)); HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(7-8).
  - **Geographic Eligibility:** FEMA IA declared parishes for Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **Eligible Applicants**: Homeowners will be eligible for the program if they meet the following criteria:
    - Owner-occupant at time of disaster event
    - Damaged property address was the applicant's primary residence at the time of disaster event
    - Located in one of FEMA IA declared parishes for Hurricanes Laura, Delta, 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) with a maximum award of $350,000, excluding any program project delivery costs. Duplication of Benefits is defined further in the program policies and procedures. The state will include details of the program standards in its policies and procedures.

    **Maximum Award**: Buyout and Incentive (Solution 4) is $250,000
  - **APA #2 REVISION:**

    **Maximum Award**: Will be determined by the scope of work based on standard/economy grade building materials as calculated by the program using national building standard estimating software, less any duplication of benefits (e.g., NFIP, FEMA or SBA) with a maximum award of $425,000, excluding any program project delivery costs. Duplication of Benefits is defined further in the program policies and procedures. The state will include details of the program standards in its policies and procedures.

    **Maximum Award**: Buyout and Incentive (Solution 4) is $250,000
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **Program Competitive Application Overview (if applicable)**
  - Not applicable
- **Program Method of Distribution Description/Overview (if applicable)**
  - As applicable and within its policies and procedures on a program-by-program basis, the state or its sub grantees will provide assistance to eligible homeowners through one of four program tracks, which homeowners will choose at the time of application:
    - **Program Managed (Solution 1):** The state manages and completes the construction process for the rehabilitation or reconstruction of damaged homes on behalf of homeowners. The state will contract with a pool of contractors and assign them to repair or reconstruct damaged properties in a resilient manner. The state will require

contractors to provide Solution 1 grantees with a one year warranty on construction. Notifications reminding homeowners of the expiration date of the warranty will be sent to homeowners.

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

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (if applicable)**
  - The MIT set-aside activities will meet the definition of mitigation (defined as activities that increase resilience to disasters, and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disaster) by moving residents that are in harm's way to a safer area where loss of life and property is far less likely along with restoring land to its natural state to lessen the impact of future disasters on the surrounding area.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (if applicable)**

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

## SOFT SECOND MORTGAGE PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$25,000,000.00** | **$20,000,000.00** | **$5,000,000.00** |
| Child | **B-21-DF-22-0001** | **$10,000,000.00** | **$8,000,000.00** | **$2,000,000.00** |
| Child | **B-21-DZ-22-0001** | **$5,000,000.00** | **$4,000,000.00** | **$1,000,000.00** |
| Child | **B-22-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 Hurricanes Laura, Delta, Ida and/or the May 2021 Severe Storms.
  - **Eligible Applicants:** A first-time homebuyer is an individual who meets any one of the following criteria:
    - An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This includes a spouse - if either meets the above test, they are considered first-time homebuyers.
    - A single parent who has only owned with a former spouse while married.
    - An individual who is a displaced homemaker and has only owned with a spouse. A displaced homemaker is a man or woman whose marital status affects their ability to be properly housed.
- **Program Responsible Entity**
  - **Administering Entity**: The State of Louisiana and/or its subrecipient(s)
- **Program Maximum Assistance**
  - **Maximum Award**: $60,000 loan maximum per unit; $5,000 maximum per unit for down payment and closing costs assistance.
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **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.

## Infrastructure Program

### HMGP GLOBAL MATCH PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$77,328,379.00** | **$61,862,703.00** | **$15,465,676.00** |
| Child | **B-21-DF-22-0001** | **$42,095,605.00** | **$33,676,484.00** | **$8,419,121.00** |
| Child | **B-21-DZ-22-0001** | **$35,232,774.00** | **$28,186,219.00** | **$7,046,555.00** |

*Narratives*

- **Program Description**
  - The state will work with eligible applicants and other state agencies to identify the most efficient means of implementing a global match program for approved FEMA's Hazard Mitigation Grant Program (HMGP) projects.
- **Program Tieback to Disaster/Unmet Needs**
  - This program addresses the unmet needs for the required non-federal match for the HMGP. The funds will be used for a global match for approved mitigation projects within the MIDs.
- **How Program will Advance Long-Term Resilience**
  - HMGP provides funds to implement hazard mitigation measures following a Presidentially Declared Disaster. Hazard mitigation actions are any action taken to reduce or eliminate the long-term risks to people and property from natural hazards. HMGP funding is made available, when authorized, for hazard mitigation planning and projects. HMGP funding is made available to the State (Applicant) based on the estimated total Federal assistance FEMA provides for disaster recovery under the Presidential declaration.
  - The goal is to *reduce* overall risk to the population and structures from *future* hazard events, while also *reducing reliance* on Federal funding in future disasters.

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

- **How Program will Address Disaster-Related Storm Water Mgmt/Other Systems**
  - The State's Hazard Mitigation Plan requires that all eligible applicants for the HMGP funds have a local hazard mitigation plan that includes Stormwater Management.
- **Program National Objective(s)**
  - Benefit to low- and moderate-income persons or households
- **Program Eligibility**
  - Non-federal share 105(a)(9)
- **Program Responsible Entity**
  - State of Louisiana or its subrecipient(s).
- **Program Maximum Assistance**
  - The maximum award is $15,000,000.00

    **APA #2 REVISION:**

    Modified to read: The maximum award is $50 million
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **Other Program Details**
  - This program will only fund hazard mitigation projects are intended to *strengthen* **facilities** and **communities,** making them *less* **vulnerable** to *future* disaster impacts.

    Examples of typical mitigation activities are listed below.

    - **Elevation** of flood-prone structures: physically raising an *existing* structure **above** the **base flood elevation** (BFE) or *higher.*
    - **Acquisition**of flood-prone structures: "**buyout**" of structures and converting land to **green space** in perpetuity.

    - Localized **drainage** improvements: *reduce* **localized** flooding by *increasing* drainage capacity.
    - **Safe room** construction: provides *immediate* near **life-safety protection** for either tornado or hurricane winds.
    - **Wind retrofit** of structures: hardening the **envelope** of a structure to protect against **high wind loads.** The envelope is the **shell** of the structure (including the doors, roof covering windows and walls) that maintains a dry, heated or cooled **indoor** ¿environment.

- **Program Competitive Application Overview (if applicable)**
    - No competitive process for this program. Eligible projects approved by FEMA will be selected for CDBG-DR global match.
- **Program Method of Distribution Description/Overview (if applicable)**
    - The state will pull project data from the Louisiana Hazard Mitigation Grant Program (LA HM) software. Subrecipients with projects selected to best meet the CDBG-DR eligibility criteria will be required to complete a ***Non-Federal Cost Share Assistance Program Application***. The Program Application will capture CDBG-DR required project information not captured in the HM application such as beneficiary data and national objectives.
    - Using the Program Application, the state will complete an eligibility review, obtain beneficiary information in an attempt to maximize the Low and Moderate Income (LMI) requirement and analyze each project in consideration of HUD MID spending requirements.
- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (if applicable)**
    - FEMA's Hazard Mitigation Grant Program [through the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP)] provides funds to implement hazard mitigation measures following a Presidentially declared disaster. Hazard mitigation actions under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is meeting the same definition.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (if applicable)**
    - FEMA's Hazard Mitigation Grant Program provides funding to state, local, tribal and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or

mitigates, future disaster losses in their communities. Eligible activities under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is addressing the same risks.

## LOCAL AND REGIONAL WATERSHED PROJECTS AND PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |
| Child | **B-22-DF-22-0001** | **$20,000,000.00** | **$16,000,000.00** | **$4,000,000.00** |

### *Narratives*

- **Program Description**
  - **APA #3 REVISION:**

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

    The state will create a program for local and regional organizations to implement identified projects with demonstrable and quantifiable mitigation outcomes with the eligible MIDs within the state's watershed 8 and the HUD MID parishes of Jefferson, Orleans, Plaquemines, St. Mary and Terrebonne.
- **Program Tieback to Disaster/Unmet Needs**
  - This program addresses the unmet needs for mitigation measures to prevent damage from future disasters presented in the mitigation unmet needs section of this Action Plan, further helping communities to increase resilience within the areas located in eligible MIDs impacted by the disaster.
- **How Program will Advance Long-Term Resilience**
  - The projects will meet the definition of mitigation to be considered eligible in order to advance long-term resilience.

- Mitigation activities are defined as those 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 disasters.
- Mitigation activities under this program are any action taken to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on Federal funding in future disasters.

- **How Program will 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.
- **Program National Objective(s)**
    - Benefit to low- and moderate-income persons or households
    - Urgent Need Mitigation
  - For activities that use Urgent Need Mitigation as their national objective, the state will require sub-grantees to demonstrate how their projects will result in a measurable and verifiable reduction in the risk of loss of life and property.
- **Program Eligibility**
  - 105(a) 1-5, 7-9, 11-12, 16
- **Program Responsible Entity**
  - Units of general local government (UGLG), and/or local and regional coalitions.
- **Program Maximum Assistance**
  - The maximum award amount is $20,000,000.
- **Program Estimated Begin and End Dates**
  - The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance. April 1, 2023 - July 31, 2028
- **Program Method of Distribution Description/Overview (if applicable)**
  - OCD, in coordination with state agency staff representing the LWI Council agencies, will evaluate pre-applications for CDBG-DR basic threshold eligibility, ensuring no disqualifying

factors for the proposed project. Criteria may include, but is not limited to, demonstration of best flood-risk mitigation practices, impacts positively benefitting the natural functions of a watershed, and benefits to vulnerable populations, including low and moderate-income populations and disadvantaged communities.

Disqualifying factors include, but are not limited to:

- Applicant is not an eligible entity
- Proposed project is not an eligible activity
- Proposed project does not mitigate flood risk
- Proposed project has potential to increase flooding in surrounding areas
- Proposed project does not demonstrate risk mitigation benefits for an LMI, MID and Disadvantaged Community area

Eligible pre-applications will be reviewed by the Region Steering Committee (RSC).

Supported by the state agency project technical advisory group (TAG), RSC will select a set number of projects to move forward for the phase 1 feasibility study and the submission of a full project application.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (if applicable)**
  - This program will fund projects with demonstrable and quantifiable flood mitigation outcomes thus increasing resilience to disasters and reducing or eliminating 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 disasters.
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (if applicable)**
  - The project funding will address flood risks that have been documented as current and future risks.

## NONFEDERAL SHARE MATCH PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$240,788,036.00** | **$192,630,429.00** | **$48,157,607.00** |
| Child | **B-21-DF-22-0001** | **$140,788,036.00** | **$112,630,429.00** | **$28,157,607.00** |
| Child | **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, Delta, 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 Program will Advance Long-Term Resilience**
  - FEMA encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. The state will support these efforts with the CDBG=DR grantees.
- **How Program will Address Disaster-Related Storm Water Mgmt/Other Systems**
  - This program will provide non-federal match funding for FEMA Public Assistance grants. Any approved grants that involve systems must be brought up to current applicable codes and local ordinances.
- **Program National Objective(s)**
    - Benefit to low- and moderate-income persons or households
    - Elimination of slums and blight or
    - Urgent Need
  - Each project worksheet will be reviewed to determine national objective. As discussed in the infrastructure unmet needs, some projects within the Public Assistance program will have had a

particular urgency, including existing conditions posing a serious and immediate threat to the health and welfare of the community.

- **Program Eligibility**
  - **Eligibile 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.
  - **APA #2 REVISION:**

    The maximum award is $31 million
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 – July 31, 2028.
- **Other Program Details**
  - Eligible Applicants include, but are not limited to, the following entities:
    - Parish and municipal governments
    - State agencies and authorities
    - Schools (K-12) and Universities
    - First responders
    - Critical infrastructure facilities as defined by FEMA (wastewater and drinking facilities)
    - Public Housing Authorities
  - Other parish and local program applicants eligible to receive federal recovery funds, including eligible private non-profit organizations.
  - The program policies and procedures may include further project selections and priorities due to funding availability including, but not limited to:
    - Most Impacted
    - Low-Income Area populations and underserved communities
    - Geographical considerations

- **Program Competitive Application Overview (if applicable)**
  - Eligible applicants with local cost-share requirements will apply for funding during a defined application period. Additional criteria for selection will be further determined within the program policies and procedures based on availability of funds and number or type of applications.
- **Program Method of Distribution Description/Overview (if applicable)**
  - Funds will be provided as payment to state agencies, eligible organizations, local governments, or other local entities for eligible activities within approved FEMA projects and programs, including reimbursement of eligible activities. The state will develop a prioritization or proration methodology for disbursing funds to state agencies, local governments, and local nonprofit organizations. The state may prioritize activity type and/or create a funding threshold.

## RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$250,000,000.00** | **$220,000,000.00** | **$30,000,000.00** |
| Child | **B-21-DF-22-0001** | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| Child | **B-21-DZ-22-0001** | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| Child | **B-22-DF-22-0001** | **$150,000,000.00** | **$120,000,000.00** | **$30,000,000.00** |

### *Narratives*

- **Program Description**
  - The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricanes Laura, Delta, 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.
  - **APA #2 REVISION:**

    While the FEMA programs aim to cover a majority of the public infrastructure repairs, the State of Louisiana knows, based on experience, the reality is that there are unmet needs beyond the immediate threat to life and direct repair to damaged facilities, which is targeted in the PA Program.

    The infrastructure loss, including; but not limited to, the loss to economic activity, property damage to residences, businesses and to the agriculture industry, far exceed the immediate remediation needs of the impacted communities. These unmet needs can only be addressed with long term planning and implementation of projects to address these problems. This program will enable some of the most damaged areas to address remaining infrastructure unmet needs.
  - **APA #3 REVISION:**

This program will enable some of the most damaged areas to address remaining infrastructure unmet needs and provide funding for local governments to develop large-scale mitigation activities that allow Louisiana communities to better withstand future disasters. Projects will demonstrably increase community resilience by reducing the hazard risks identified in the Mitigation Needs Assessment portion of this Action Plan.

- **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.
  - **APA #2 REVISION:**

    This program addresses the unmet needs in the areas of infrastructure in order to expand upon and improve resilient community planning located in eligible MIDs.
- **How Program will 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.
  - **APA #3 REVISION:**

    This program will require projects to meet the definition of mitigation. Mitigation activities are defined as those 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 disasters.

    Mitigation activities under this program are any action taken to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on Federal funding in future disasters.
- **How Program will 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.

- **Program National Objective(s)**
    - Benefit to low-and moderate-income persons;
    - Aid in the prevention or elimination of slums or blight.
  - **APA #3 REVISION:**
    - Benefit to low-and moderate-income persons;
    - Aid in the prevention or elimination of slums or blight.
    - Urgent Need - Mitigation
- **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.
  - **APA #2 REVISION:**

    The maximum award amount is $25 million
  - **APA #3 REVISION:**

    The maximum award amount is $70 million.
- **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.)
- **Program Method of Distribution Description/Overview (if applicable)**
  - **APA #2 REVISION:**

    OCD will distribute the funds as determined by the following methodology:
    - OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.
    - OCD applied the percent of total damages to overall program budget of $50 million for each grant.
    - OCD established a minimum of $600,000 and a maximum of $25 million. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
    - Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million.
    - For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.
    - If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.
  - **APA # 3 REVISION:**

OCD will distribute the funds as determined by the following methodology:

- OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $200 million for Ida and the May 2021 Severe Storms.
- OCD established a minimum of $600,000 and a maximum of $25 million for Laura/Delta; with a minimum of $300,000 for Ida and the May 2021 Severe Storms. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
- Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million for Laura/Delta.
- For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.
- If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.

## Economic Revitalization Program

### HOMETOWN REVITALIZATION PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$215,000,000.00** | **$197,000,000.00** | **$18,000,000.00** |
| Child | **B-21-DF-22-0001** | **$75,000,000.00** | **$75,000,000.00** | **$0.00** |
| Child | **B-21-DZ-22-0001** | **$50,000,000.00** | **$50,000,000.00** | **$0.00** |
| Child | **B-22-DF-22-0001** | **$90,000,000.00** | **$72,000,000.00** | **$18,000,000.00** |

*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.

- **APA #2 REVISION:**

  The state will create a program for eligible subrecipients to revitalize 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
- **APA #3 REVISION:**
  - Benefit to low-and moderate-income persons;
  - Aid in the prevention or elimination of slums or blight
  - Urgent Need - Mitigation
- **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.
  - **APA #2 REVISIONS:**

    The maximum award amount is $25 million
  - **APA #3 REVISION:**

    The maximum award amount is $70 million
- **Program Estimated Begin and End Dates**
  - The state estimates the start and end dates will be August 1, 2022 - July 31, 2028
- **Other Program Details**
  - 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.

- **Program Method of Distribution Description/Overview (if applicable)**
  - **APA #2 REVISION:**

    OCD will distribute the funds as determined by the following methodology:

    - OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.
    - OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $75 million for Ida/May 2021 Severe Storms.
    - OCD established a minimum of $600,000 and a maximum of $25 million. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
    - Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million.
    - For the entitlement city of Laura/Delta that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.
    - If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.
  - **APA #3 REVISION:**

    OCD will distribute the funds as determined by the following methodology:

    - OCD obtained the total FEMA Individual Assistance and Public Assistance damages and calculated as a percent of total. The Public Assistance percentages were weighted at 2/3 and the Individual Assistance at 1/3.
    - OCD applied the percent of total damages to overall program budget of $50 million for Laura/Delta and $165 million for Ida and the May 2021 Severe Storms.

- OCD established a minimum of $600,000 and a maximum of $25 million for Laura/Delta; with a minimum of $300,000 for Ida and the May 2021 Severe Storms. Grants are costly to administer due to the federal requirements imposed on the funding. Smaller grants would be much less cost-effective to employ and would waste already limited resources.
- Any HUD MID that fell outside of this range was reduced to zero allocation or maximum of $25 million for Laura/Delta.
- For the entitlement city that fell between minimum and maximum, we obtained the total damages for the parish and entitlement city and calculated the percent of total.

If funds were remaining, OCD redistributed across the HUD MID areas that met the minimum and maximum allocation.

## SMALL BUSINESS LOAN AND GRANT PROGRAM

| GRANT TYPE | GRANT NUMBER | PROPOSED BUDGET | PROPOSED HUD-IDENTIFIED MID BUDGET | PROPOSED GRANTEE-IDENTIFIED MID BUDGET |
|---|---|---|---|---|
| Parent | **P-21-LA-22-LDZ1** | **$96,150,714.00** | **$76,920,572.00** | **$19,230,142.00** |
| Child | **B-21-DF-22-0001** | **$45,695,232.00** | **$36,556,186.00** | **$9,139,046.00** |
| Child | **B-21-DZ-22-0001** | **$50,455,482.00** | **$40,364,386.00** | **$10,091,096.00** |

### *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 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).

- **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.

# 5. APPENDIX

o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Signed by _____ Date 4/28/22
Jay Dardenne, Commissioner of Administration

# A. CERTIFICATIONS

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.

e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.

f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

i. The grantee certifies that it is complying with each of the following criteria:

1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
    a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
    b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.

k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force

by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.

n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

# SUBSTANTIAL AMENDMENT NO. 1

## 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.

d. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.

e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.

f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.

g. 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).

h. 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.

i. The grantee certifies that it is complying with each of the following criteria:

j. 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.).

k. 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.

l. 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.

m. 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).

n. 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.

o. 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:

p. 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

q. 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.

r. 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.

s. 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.

t. 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.

u. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.

v. 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 (PREVIOUSLY APPROVED)

OCD is requesting that HUD expand the waiver of 42 USC 5304(d)(3) and 24 CFR 42.375 to include all CDBG-MIT funded residential buyout properties of the one-for-one replacement requirement. The current wavier is located in Section IV.F.1 of the Consolidated Notice.

Generally, the one-for-one replacement requirements of 42 USC 5304(d)(3) and 24 CFR 42.375 are designed to prevent the net reduction of affordable housing units in a community in order to avoid the

unintentional displacement of residents with a low- to- moderate income due to unavailability of affordable units.

In allocations of CDBG Disaster Recovery funds as well as the CDBG Mitigation funds, HUD has waived the requirement for homes that have been damaged and are deemed not suitable for rehabilitation. The waiver is based on the realization that the requirements:

Do not account for the large, sudden changes that a major disaster may cause to the local housing stock, population, or economy. Disaster-damaged housing structures that are not suitable for rehabilitation can pose a threat to public health and safety and to economic revitalization.

OCD submits the waiver should be extended to CDBG-MIT buyout programs overall (not just storm damaged properties), as the requirements are similarly inconsistent with the fundamental purpose of CDBG-MIT-funded buyouts. The material reason for the buyout is that the structure is in an at-risk areas and the structure should be removed to prevent future damage.

In OCD's model of MIT-funded buyout, the buyout amount can be coupled with a Safe Housing Incentive Grant, through which an eligible low-to-moderate income 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 of flooding. It would be inappropriate to construct new affordable units in neighborhoods subject to substantial flood risk, as that would be a new investment in property likely to flood and placing future residents at risk. When residential buyout projects are used as a mitigation strategy to address future flood risk, they are intended to occur prior to anticipated future damage to the units. Thus, not all of the homes eligible for the buyout are currently storm damaged. However, simply based on their eligibility for a mitigation based buyout program, they should be subject to the waiver of the one-for-one replacement requirement as they prevent damage to, rather than enable recovery from, the damage of such units.

The one-for-one replacement requirement, when applied to the buyout of flood-prone property, would result in investment of the rough equivalent of the fair market value of the home subject for buyout and the additional applicable safe housing incentive in order to facilitate relocation of the residents to a safer location, and an additional investment of funds to construct a new affordable unit mitigated to avoid the

flood risk in the subject area. This compound cost would discourage the use of buyouts as a mitigation strategy and would make buyout projects cost prohibitive.

The best practices in the residential buyout or acquisition of land to mitigate flood risk factor into a larger or more comprehensive strategy to concentrate residential development in safer areas, while reducing residential development density in areas at severe flood risk. A “make room for the water” approach means that buyouts are employed in a way to discourage further development in high-risk flood zones. The requirement to construct new affordable units in the recipient's jurisdiction; to the extent feasible and consistent with other statutory priorities, within the same neighborhood as the units replaced would conflict with a comprehensive strategy to avoid the continued residential development of areas at high risk of flooding.

## SUBSTANTIAL AMENDMENT NO. 1

Waivers Previously submitted to HUD on July 7, 2022

*(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 wavier 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

Since 2006, the timing of requests by disaster recovery grantees and of HUD's consideration of those requests have varied. In Louisiana's experience with the 2016 floods, HUD generally requested that the state commence its programs before requesting a reduction of the overall LMI benefit requirement below 70%, in order to demonstrate that the programs were prepared to address the unmet needs of LMI households before requesting the reduction in the requirement. Historically, HUD has ultimately agreed with Louisiana's requests for reductions were warranted, and granted waiver requests.

In the current circumstances, Louisiana submits that based on Unmet Needs information provided from FEMA, correlated with HUD's parish level LMI tables, reduction of the initial overall benefit requirement is warranted, rendering the delay in the reduction request unnecessary.

Specifically, the FEMA individual assistance program data reflects there 62.21 percent of homeowners were LMI, and 72.80 percent of renters were LMI. The associated LMI unmet need is $348 Million, which is 58% of our total allocation of $600,131. The conclusion is that requiring the state to expend funds in excess of that amount would be for matters above the identified LMI unmet needs calculations. Accordingly at this juncture, the overall benefit requirement should be reduced to 60%.

### 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 of 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 February 18, 2022. The plan had modifications to include HUD's announcement of additional funding and change in MIDs . These changes were to inform the public of the expected increase and how the State would modify the budget through an amendment. The change was made on April 1, 2022. Therefore, OCD extended the publish comment period another 30 days which officially ended on May 1, 2022. After the public comment period ended, the state prepared responses to the comments. A summary of the comments and responses were added to the Action Plan for submittal to HUD as an attachment in the supporting document section. Additionally, these comments and responses were posted publicly on the OCD website. The comments and responses can be found under supporting documents titled: L_D_PC_FromAP_Public_Hearing_Combined_compressed.pdf.

## SUBSTANTIAL AMENDMENT NO. 1

The Public comment period intially 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 MIDs for Huricanne 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 publically on the OCD website. The comments and responses can be found under supporting documents titled: APA 1_Public Comments_Compliled_LDIDAMay21.

## SUBSTANTIAL AMENDMENT NO. 2

The public comment period initially began on November 23, 2022, and ended on December 23, 2022. This plan had modifications to the proposed programs, including program benefits and allocations. After the public comment period ended, the state prepared responses to the comments. Additionally, these comments and responses were posted publically on the OCD website. The comments and responses can be found under supporting documents titled: APA2_Public_Comments_Compliled_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

The Signed SF-424 was emailed to HUD on 5/3/2022 due to the size of the file.

# G. SUMMARY AND RESPONSE OF PUBLIC COMMENTS

5/7

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

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

To complete the program survey, visit restore.la.gov or call 866.735.2001.

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

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

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

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

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

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

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

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

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

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

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

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

- Owner-occupant of the home at the time of disaster event and still maintains ownership through program final project inspection.
- Damaged address was the applicant's primary residence at the time of disaster event.
- Suffered damage as a result of the 2020-21 disasters listed above.

- Eligible structure as determined by program, including single family homes, duplexes, mobile homes and condominiums.

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

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

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

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

- Owner-occupant of the home at the time of disaster event and still maintains ownership through program final project inspection.

- Damaged address was the applicant's primary residence at the time of disaster event.

- Suffered damage as a result of the 2020-21 disasters listed above.

- Eligible structure as determined by program, including single family homes, duplexes, mobile homes and condominiums.

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

**The deadline to complete the survey is Tuesday, August 1, 2023.** For more information regarding program eligibility, see the program policy manual at restore.la.gov.

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

RESPONSE: Thank you for your comment. The Restore Louisiana Homeowner Assistance Program allows for IBHS Fortified Roof standards within the construction cost. See the program policy manual as well as the

see the Fortified Roof Repair Checklist on the program website for more information on the fortified standards which exceeds LA building codes.

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

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

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

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

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

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

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

For more information related to structure type eligibility and assistance, visit restore.la.gov.

5/8

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

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

- Owner-occupant of the home at the time of disaster event and still maintains ownership through program final project inspection.
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- Eligible structure as determined by program, including single family homes, duplexes, mobile homes and condominiums.
- Located in one of the 60 disaster-declared parishes.

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

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

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

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

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

The program recently expanded the FEMA-determined damage threshold from $5,000 to $3,000 and raised the allowable maximum of insurance received from $25,000 to $50,000, expanding the number of homeowners who can potentially qualify for assistance. The program will provide periodic updates after you complete the initial survey, and based on your survey responses, the program will provide more information regarding the availability of a full program application and any next steps required.

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

6/11

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

1. Helping the many that are underinsured in Louisiana, with special attention be paid to Southeast Louisiana and Washington Parish, as the latter was grossly underserved,

2. Case Management for Washington Parish and other rural areas of Louisiana that do not experience the same level of service that is currently extended to larger areas,

3. Community Canvas to ensure ALL populations have been served. So many in rural areas lack the knowledge base and understanding all the vast offerings of the program. It would help tremendously to spend much needed resources on extended out to rural areas and help fellow Louisianians.

4. Continued rental assistance for those that are displaced. Insurance and FEMA both have exhausted lodging offerings to homeowners and renters that continue to be displaced and would be otherwise homeless. This service should be extended regardless of income as this horrible disaster was by no fault of their own at all. If income plays a part at all, the scale should be more than liberal as insurance companies have grossly underinsured so many insurance companies have notified residents that they will not cover others after they rehabilitate their homes.

5. Investing in a team that will go out and explain Restore 20's offerings and actual help undereducated and/or overwhelmed citizens RESTORE their homes and their lives. Where comprehensive case management is touted, Washington Parish has, in particular, has not seen enough of that at all.

6. FREE Disaster Prep Kits for each parish. For instance, 265 INV prepares such kits for schools and hospitals in Texas as well as homeowner associations. Some of the offerings in the kit are basic mold kits (for people to test mold themselves), 4 sets of towels, wireless cell phone charger, basic COVID KITS (N95 masks, gloves, and eye protection, etc.) (265investments.com), first aid kit, paper towels, toilet tissue, waste disposal bags, 2 cases of water, water sanitation tablets (when potable drinking water runs out), basic personal hygiene kit), plastic sheeting, and other items as recommended by FEMA. Every registered household should be given kits for EACH member listed in their home. Recipients should be contacted twice a year to ensure they are still in possession of them BEFORE storm season. First one free. At specified cost thereafter.

7. Grant funding should be made available for those that still lack resources such as housing, child care assistance, crisis assistance, and insurance.

8. Funding to help Louisiana contract the proper companies in to facilitate and expedite these offerings. It is apparent that help is needed. Let's get ahead of the ball for a change rather than behind.

9. Expanding case management in rural areas (of which Louisiana has quite a few) year round via contracted assistance to canvas areas and help identify areas of the parish and homes that are most vulnerable BEFORE disaster strikes. Google Earth recently updated their data here in Washington Parish which will help tremendously as storm season approaches.

10. Develop a Storm Hit List  of available contractors and their offerings. Contact them, make sure they are registered with Sam.gov and LaPAC pre-stlrm season.

11. Streamline bids listed in LaPac so more companies will bid. The current process is cumbersome and many simply throw their hands up and do not submit on RFIs, RFPs, nor RFBs. Only the essential as should be there. What the state of Louisiana needs should be made plain as well as what is expected.

12. 24- hour call number that can help those in need. Getting a voicemail or message when the only time a person may have to call is on the weekend or at night is the absolute most frustrating thing for a person in need and/or displaced.

13. Build sustainable housing rentals in rural areas (those prone to storm damage) so that people can stay there as opposed to different cities, away from their often away employment and families. Just a few sustainable rentals would help take the stress off of the hotels during this time. For instance, there are not enough safe and sustainable rentals in Washington Parish. Most people have to travel to St. Tammany or Mississippi for decent rentals when disaster strikes for emergency housing. 50 - 100 units here (split in each quadrant of the parish) would be ideal as people could keep most of their quality of life while being close to disaster-stricken properties while they reconstruct or renew their homes.

14. Ensure each school with a gymnasium and church with a life center capable of converting to a make-shift hospital or shelter has provided their capacity and stock need to the state of Louisiana as they will be needed during times of disaster.

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

RESPONSE: Thank you for your comments. The state has conducted an in-depth analysis to determine unmet needs of residents, businesses and communities as we roll out recovery programs benefiting

housing, economic revitalization and infrastructure efforts throughout the state. Additionally, since the Federal Register Notice stipulates how the state is to spend the allocated federal dollars, we must ensure compliance with these regulatory requirements and federal guidelines.

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

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

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

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

The Louisiana Housing Corporation is administering various rental recovery programs and you can find more information about those programs at www.lhc.la.gov.

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

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

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

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

**COMMENT**: My husband was once an elementary and a junior high teacher in Lafourche and Jefferson Parishes but returned to his alma mater, Nicholls State University, and received his second Bachelors

degree in Accounting, and his MBA and enjoyed his accounting job at Edison Chouest Offshore (aka Galliano Marine Service) previous to Hurricane Ida. I am a disabled former Cardiopulmonary Therapy Director and provided full time care for the previous 10 years (until June 28, 2021) for my younger brother who is now a quadriplegic but was once a paramedic in Northeast Texas.
We were by no means wealthy, but we were paying our bills.
In May of 2021, I had to have lumbar surgery requiring a fusion and a laminectomy and was unable to provide care for my brother, so he moved back to Northeast Texas to a nursing home to be near his grown kids and granddaughter in June of 2021—and thank goodness, since the tragedies that occurred as a result of unpreparedness of the nursing home in South Lafourche ( which claimed the life of my husband's grandmother.) We also lost my husband's grandfather and my older brother since Ida. So much loss and devastation for everyone here! My husband and I were very happy, before Ida, although I was in a great deal of pain (and in April of 2022, had to have additional spine surgery, a triple fusion, in my neck. Ida and its spin-off tornado struck our area of Cut Off and Galliano in August of 2021 and literally wrecked our lives and home. Our roof caved in over the master suite and foyer of our Galliano double wide mobile home, and the roof, attic, and ceiling, along with enormous amounts of insulation, all collapsed upon our brand new adjustable bed that we'd literally had for 10 days and still owe many thousands of dollars on it, (but it was a necessary expense, because, I've had 5 places in my spine operated on, and I must sleep while sitting up but now must use 5-6 pillows.) We had evacuated to Southwest Texas before the storm but saw the live footage of Lady of the Sea General Hospital, in Cut Off, which is very near our home, being destroyed on CNN while we were evacuated there. Since our returning home, our lives have been turned upside down. We sustained $156K in damages to our home, and our insurance company (which I can't name) offered us $29K, so we had to sue them, which was a grueling process, and in the meantime, my husband began to suffer debilitating depression, panic attacks, and chest pains, and in April of 2022, had to leave his job that he loved because of his depression and anxiety. My husband became self employed by going full time with his eBay store, dkd_shop, but lost his health, vision, and life insurance, and 401K, and we have acquired a massive amount of debt by living off our credit cards since Ida and his job loss. I must also explain that I am disabled due to bipolar disorder, PTSD, panic attacks, and agoraphobia ( which means that my home was my happy place, and I did not feel at ease anywhere else, to say the least.) Therefore, I've lived in a constant state of anxiety since Ida but have had to stop my therapy with social worker, Ron Dantin, at Lady of the Sea Clinic in Cut Off, due to lack of funds. In addition, I literally have a screw coming loose in my titanium hardware in my triple neck/spine fusion and was referred to a pain specialist to go get an epidural injection (and also, I re-injured my neck due to tripping on the water hose that went from our home to our Ida Sheltering camper,) but I couldn't get the shot, because it is done only in a one day outpatient surgery center under anesthesia, and we've been literally counting pocket change for gas and/or food, so having to pay for outpatient surgery is out of the question, and so is the recommended physical therapy by my surgeon(s) from the AVALA hospital, in Covington, and so was the physical therapy that my husband was supposed to be continuing to receive for his fall in our Ida Sheltering camper shower, after his losing his health insurance. Now, my neck/spine damage is to the point where I have shooting pain from my right ear, down my neck, into my right shoulder, and down to the right elbow, but then having tremendous numbness from the right elbow down to my fingers, and I can't even lift little more than a gallon of milk with my right hand currently. My husband did not have medical insurance after he left Edison Chouest, and

he had to go to the ER due to the slip and fall in our Ida Sheltering camper shower, which resulted in a bill that was over $9K, counting the Ochsner St Anne ER facility and the separate ER physician statement. Our Ida Sheltering camper stay was a disaster of a different kind in itself, because our carbon monoxide detector was extremely frequently alarming; we ran out of propane often at inconvenient times at night in the winter; we had bugs, roaches, running rampant everywhere and couldn't spray for them due to the CO (carbon monoxide) detector; the camper caused our electric bill to be >$600 one month; we had creaking and cracking in our 1/4 inch plywood underneath our camper bed and had to purchase two 6-inch foam mattress toppers for me to even sleep for 2-3 hours due to my post-op neck and back pain; but then finally, I was verbally harassed on the phone by an Ida Sheltering woman who was quite angry, because I had not called them to check in (when my husband had been meeting weekly with one of their representatives named Robert in person to inspect the camper, and Robert had told us that we only needed to deal with him for the remainder of the duration of our camper days,) but after we were told that we would have to begin paying rent this year, we called them and requested that they come and pick up the camper, and we moved into our 80% damaged, extremely moldy home in our guest bedroom as far away from the damage in our home as we could get. The Entergy rebates for Ida covered the New Orleans area but did not include the parishes that were most affected by Hurricane Ida, by the way, including Lafourche Parish. Now, we are still currently living in our guest bedroom in our home, and it wasn't until May—last month— that we were able to get a new roof and had all of the wet (from our leaking tarp after Ida, and the roof collapse) and severely molded sheetrock removed. We also in late April of this year, lost one of our very large wind turbines from a windstorm and didn't know it, but during the next rainstorm, we had water gushing through the light fixture in our foyer and had it running through the walls, to our astonishment! My husband has had chronic bronchitis that lasted over 4 months, to the point that he would cough until he turned purple and had to go lie down under the fan for hours to catch his breath, so his self employment eBay work has suffered, and I've had bronchitis 3-4 times since Ida, also. My husband is supposed to be going to see a lung specialist and an allergy specialist, but again, we don't have any money for that either. This is very difficult to say, but we've gone from surviving well before Ida, to my having to sell all of my gold, silver, and diamonds—including my grandmother's vintage antique wedding ring that I was using as my own, that has been in my possession for 40 years, and we still are drowning in debt right now, but I have nothing left to sell.We can't afford our mental health and blood pressure medicines, (and my vitamins and supplements that are required since I had had a gastric bypass in 2005) and when we do buy those medicines, then we are neglecting other bills to do so. The truth is, we haven't been able to pay all of our bills every month since my husband had to leave his job.
We have been receiving a great deal of our food from Second Harvest, which is a food bank, with our church. My husband and I are both Sunday school teachers, as David teaches the adults, and I teach the pre-K through the second graders, and we love that so much! We are both suffering through physical and emotional pain. My husband and I separately owe Ochsner for many medical expenses, and I am becoming increasingly concerned and depressed (and distressed) due to all of these facts. We also owe Lady of the Sea General Hospital ER for a visit due to my husband's chest pain, and he was supposed to be seeing a cardiologist, but we can't afford that either, and that visit occurred when he had no insurance, so we owe them several thousands of dollars as well. We've been denied Medicaid and Ochsner's and LOSGH ER's financial assistance program repeatedly, solely based upon MY social security disability income alone, and

my husband's previous much better income at Chouest, so, if we didn't have our strong faith in God, we'd feel absolutely hopeless, and I'm very, very worried, because my husband has $100K in student loan debt that will begin to be due in August, so we can only receive money from eBay for quality goods sold—but that requires the money to buy the items that he sells from garage sales, flea markets, and/or thrift stores, and we've been so strapped for money to pay our bills already. We've had our internet turned off twice, and have had to use his cell phone to conduct eBay business by using his cellular data from his cell phone from AT&T. We've almost also had our water and electricity cut off a few times, too. Life is not fun nor easy any longer, but we're stuck in our current situation, until we can somehow catch up. Now, we're both living in fear of losing our home, because as a result of our lawsuit, while we were working on an SBA loan, (that we couldn't get after (husband) had to leave his job,) we were told to pay off our mortgage then by the SBA, and did, but were unable to pay for repairs to our home. We could not afford the SBA loan for 30 years, nor afford to replace the bed that we had just put on our credit card from Rooms to Go in Metairie any longer. In our settlement with our insurance company, we only received a check, that was not quite enough to pay off our mortgage, and we later learned that our check was including our personal property—but that was not specified, at that time, because our mortgage company would not have accepted the money if some of it was also for personal property, but that is a separate issue altogether. At the time of our settlement agreement, I was visiting my brother in Texas, for his only daughter's wedding in May of 2022, and I had just had the triple spine fusion in my neck a month before, and I was under the influence of very heavy narcotics, Oxycodone, and could scarcely understand what I was agreeing with, and I can prove it, because I electronically signed it on my phone, and I called my attorney several times to ask questions regarding the agreement, and she became so irritated with me, to my not understanding what I had signed, that she refused to accept my calls afterwards any longer and stated that she had explained it to me 5 times. My attorney didn't seem to understand that I was heavily medicated, enormously in pain, and in a constant state of shock due to my mental illnesses. The happiest part of all of this is that we were finally linked up with the Bayou Community Foundation, which has so wonderfully paid for our building materials for our roof, while the Amish CARE disaster relief group provided the labor for our roof job and for the removal of the moldy walls and ceilings, and we're so very extremely thankful to be having our home partially restored but simultaneously terrified of losing it all. I just had to cancel our cancer and accident insurance through AFLAC 3 days ago, also, but we literally began this month of June being -$600 to -$800 in the combination of both bank accounts. I'm feeling like we've been sinking deeper in debt every month, and we're going to have to begin paying on the student loan debt, in addition to everything, including my husband's new medical insurance. The vehicle we drive is my brother's handicap accessible van, and I know that we cannot file for bankruptcy, because we'll lose his van, and probably our home, and I'd never forgive myself if that happened, especially to my younger brother's van. We've been married for 16 years and spent 10 of those years providing care to my quadriplegic brother, so we've had a very rough time. If anything, we are thankful that our marriage and friendship has grown much stronger together and stronger in the Lord, and for that, we are so blessed and grateful. Is there an answer to all of this? We are praying for the answers constantly but haven't found them yet but have not lost our faith in God. We just wish that the Hurricane had never happened. It destroyed soo much—too much…That's our story, and if you publish it, please withhold our names and very personal details, but please, share it, if it would help someone who is

in authority or other survivors who can relate or help. I can prove that everything I have said is true and correct.

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

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

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

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

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

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

6/15

**COMMENT**: I wouldn't recommend Louisiana homeowners apply to Restore LA for assistance. Personally, it was a waste of time for us. We own our home, we were living in our home at the time of hurricane Ida, We had wind damage for hurricane Ida. We have homeowners insurance with Louisiana Farm Bureau and flood insurance NFIP with Allstate. Unfortunately, our homeowners policy has a Wind & Hail Exclusion attached.

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

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

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

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

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

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

2. Housing Stock, the nation has a housing deficit of 3.1 million homes. In Louisiana, the housing stock is low. We have been successful using the soft second program since 2000. The unmet need at this time is housing supply. I would like to see a Pilot Resilient Housing Program requiring all rehab and new construction homes to use sustainable products. I serve on the Louisiana Homeownership Think Tank committee, a program operating under LHC . We just completed a study on building homes to withstand 180 hurricane winds. Like to share this information with OCD.

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

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

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

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

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

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

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

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

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

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

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

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

6/19

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

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

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

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

6/22

**COMMENT**: I would like to recommend an appropriation / expenditure from Amendment 3. The governor signed SB 147 into law as Act 259, however, the appropriation for this program was deleted from HB 1. The appropriation was partial funding ($5 million) toward the one-time seed money needed (a total of $8.71 million) to get this self-insurance program off the ground. Once operational, it would be funded by premiums from participants. This measure is critical to the faith community, because the three major insurers for churches are either exiting the state (Church Mutual) or being so selective and raising premiums so high that congregations cannot afford to protect their properties against potential casualties from storms (Brotherhood Mutual and GuideOne). I represent 1,600 congregations of the Louisiana Baptist Convention. However, the United Pentecostal Church (500 churches), Assembly of God (300 churches) and Louisiana Home & Foreign Missions Baptist State Convention (200 churches) have been working together on this issue. Others are being kept informed. Likewise, 9 faith-based universities (LAICU) are engaged with us on the matter. This should be a priority project for funding in Amendment 3.

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

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State Convention (200 churches) have been working together on this issue. Others are being kept informed. Likewise, 9 faith-based universities (LAICU) are engaged with us on the matter.

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

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

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

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

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

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

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

Our state transitional living ministry in Monroe provides on-campus housing to homeless children and their mothers for a savings to the state of about **$300,000 annually**. Meanwhile, our foster care ministry benefits the state by another **$192,000 per annum**. Also, we just announced plans to open a regional compassion

ministry center in Monroe that will provide weekend food backpacks and school supplies for about 25,000 children – **an estimated in-kind yearly value of $750,000**.

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

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

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

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

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

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

LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

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

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

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

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

| As of 12/31/21 | Professions of Faith | Gospel Presentations | Sum of Volunteer Days - Total | Sum of Work Hours | Total Contacts | Bibles Distributed | Total Meals Prepared | Sum of Meals Served | Assessments | Heavy Equipment Hours | Sum of Chainsaw Jobs | Sum of Crisis Buckets Distributed | Sum of Tear Out | Sum of Pressure Wash | Sum of Mold Remediation | Sum of Debris Removal | Sum of Temporary Roofing | Showers | Laundry Loads | Sum of Water Purified (Gals) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **August 2021 - Hurricane Ida** | **242** | **1090** | **22307** | **188827** | **14193** | **1413** | **783979** | **14788** | **4231** | **3669** | **1028** | **148** | **114** | **8** | **77** | **52** | **377** | **13472** | **8392** | **39003** |
| LA - Lake Charles, Trinity Baptist Church | 0 | 0 | 4 | 36 | 0 | 0 | | | | | | 0 | | | | | | | | |
| LA - Forest Hill, Tall Timbers Conference Center | 0 | 0 | 450 | 5005 | 12 | 0 | 572 | | 0 | 0 | | 0 | | | | | 0 | | | |
| LA - Gonzales, Lamar Dixon Expo Center | 0 | 20 | 933 | 9080 | 244 | 13 | 204862 | | 2 | 4 | 2 | | | | | | | 836 | 710 | |
| LA - Mandeville, First Baptist Church | 7 | 55 | 2209 | 19608 | 1950 | 277 | 31432 | 14617 | 385 | 236 | 193 | 140 | 21 | 4 | 17 | 3 | 17 | 2348 | 1252 | |

| | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| LA - Gonzales, Ascension Baptist Church | 3 | 36 | 1229 | 12359 | 1404 | 63 | 119390 | | 207 | 201 | 33 | 0 | | | | 1 | 1 | 1076 | 755 | |
| LA - Hammond, Woodland Park Baptist Church | 41 | 179 | 2179 | 17027 | 1185 | 206 | 56995 | | 353 | 548 | 186 | 0 | 3 | 0 | 3 | 12 | 42 | 1507 | 649 | |
| LA - Kentwood, First Baptist Church | 33 | 65 | 633 | 5134 | 685 | 10 | 1464 | | 251 | 0 | 80 | 0 | 1 | 0 | 0 | | 183 | | 55 | |
| LA - New Orleans, Salvation Army Site | 0 | 0 | 78 | 479 | 3 | 0 | 5500 | | 0 | 8 | 2 | | | | | 1 | | 0 | 0 | |
| LA - Morgan City, Bayou Vista Baptist Church | 51 | 203 | 2638 | 22142 | 1201 | 89 | 75272 | | 591 | 356 | 74 | 0 | 22 | 1 | 13 | 8 | 11 | 2133 | 845 | |
| LA - West Monroe, McLendon Baptist Church | 0 | 0 | 28 | 280 | 90 | 0 | | | | | | | | | | | | 0 | 121 | |
| LA - Belle Chasse, First Baptist Church | 11 | 91 | 1270 | 10314 | 1311 | 131 | 3488 | | 482 | 232 | 92 | 0 | 11 | 2 | 7 | 0 | 7 | 944 | 392 | |
| LA - New Orleans, First Baptist Church | 1 | 1 | 1651 | 14326 | 564 | 5 | 186835 | 0 | 599 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 4 | 1107 | 963 | |
| LA - Denham Springs, First Baptist Church | 1 | 44 | 266 | 1870 | 344 | 52 | 658 | | 12 | 74 | 5 | 0 | | | | 0 | 1 | 144 | 70 | |
| LA - St. Amant, New River Baptist Church | 28 | 107 | 3080 | 25622 | 1178 | 259 | 7385 | 171 | 499 | 1485 | 254 | 8 | 20 | 0 | 12 | 0 | 9 | 2198 | 1476 | 39003 |
| LA - Metairie, Metairie Baptist Church | 22 | 79 | 2271 | 16473 | 496 | 82 | 5468 | | 246 | 0 | | 0 | | | | 4 | 50 | 0 | 0 | |
| LA - Lake Bistineau State Park | 0 | 0 | 8 | 80 | 0 | 0 | | | | | | | | | | | | | 160 | |
| LA - Kenner, Williams Blvd Baptist Church | 0 | 0 | 22 | 220 | 0 | 0 | 4960 | | | | | | | | | | | | | |
| LA - Houma, Coteau Baptist Church | 7 | 47 | 739 | 6907 | 690 | 84 | 1578 | | 164 | 108 | 34 | 0 | 9 | 1 | 3 | 5 | 42 | 391 | 222 | |
| LA - Monroe, Community Center | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | 120 | |
| LA - LaPlace, First Baptist Church | 2 | 23 | 42 | 391 | 615 | 0 | | | 0 | | 1 | | | | | 1 | | 35 | 233 | |
| LA - Covington, First Baptist Church | 2 | 5 | 724 | 3946 | 181 | 48 | | | 287 | 276 | 16 | 0 | 4 | 0 | 2 | 15 | 2 | | | |
| LA - Morgan City, First Baptist Church | 0 | 4 | 228 | 2045 | 154 | 5 | 99 | | 69 | 72 | 16 | 0 | 6 | 0 | 5 | | 2 | | | |
| LA - Houma, Rouses Market | 0 | 14 | 553 | 4868 | 854 | 0 | 74527 | | | | | 0 | | | | | | | | |
| LA - Minden, Harris Baptist Assembly | 0 | 0 | 10 | 100 | 0 | 0 | | | | | | | | | | | | 0 | 52 | |
| AL - Mobile, Ida Shelters | 0 | 0 | 2 | 20 | 5 | 1 | | | | | | 0 | | | | | | | | |
| LA - Golden Meadow, First Baptist Church | 33 | 112 | 968 | 9571 | 1010 | 87 | 2237 | | 83 | 47 | 33 | 0 | 17 | 0 | 15 | 0 | 5 | 753 | 317 | |
| LA - Jean Lafitte, Barataria Baptist Church | 0 | 0 | 57 | 570 | 12 | 0 | 1257 | | 1 | 0 | 0 | | | | | | 0 | | | |
| LA - Walker, Walker Baptist Church | 0 | 5 | 35 | 357 | 5 | 1 | | | 0 | 22 | 7 | 0 | | | | 0 | 1 | | | |
| **Grand Total** | **242** | **1090** | **22307** | **188827** | **14193** | **1413** | **783979** | **14788** | **4231** | **3669** | **1028** | **148** | **114** | **8** | **77** | **52** | **377** | **13472** | **8392** | **39003** |

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

While the creation of a self-insurance program authorized under the newly enacted provisions of LSA R.S. 22:472.1 – 472.20 is a worthy goal, there are limits to the use of CDBG-DR funds which prevent providing the capital to fund the trust fund required under the provisions of those statutes. Similarly while the value of in-kind services / philanthropic activities may sometimes be utilized in having a nonprofit meet various nonfederal match requirements, those services are generally not eligible for reimbursement retroactively with CDBG-DR funds. Additionally, congregants who have been impacted by 2020-21 disasters are encouraged to complete the program survey if they have not already done so. The survey is the critical first step toward receiving program assistance. To complete the program survey, homeowners can visit restore.la.gov or call 866.735.2001. **The deadline to complete the survey is Tuesday, August 1, 2023.**

5/30

**COMMENT:** Representatives from the City of Thibodaux's administration attended the Louisiana Office of Community Development public hearing that was held on Thursday, June 15, 2023. The City of Thibodaux

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

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

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

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

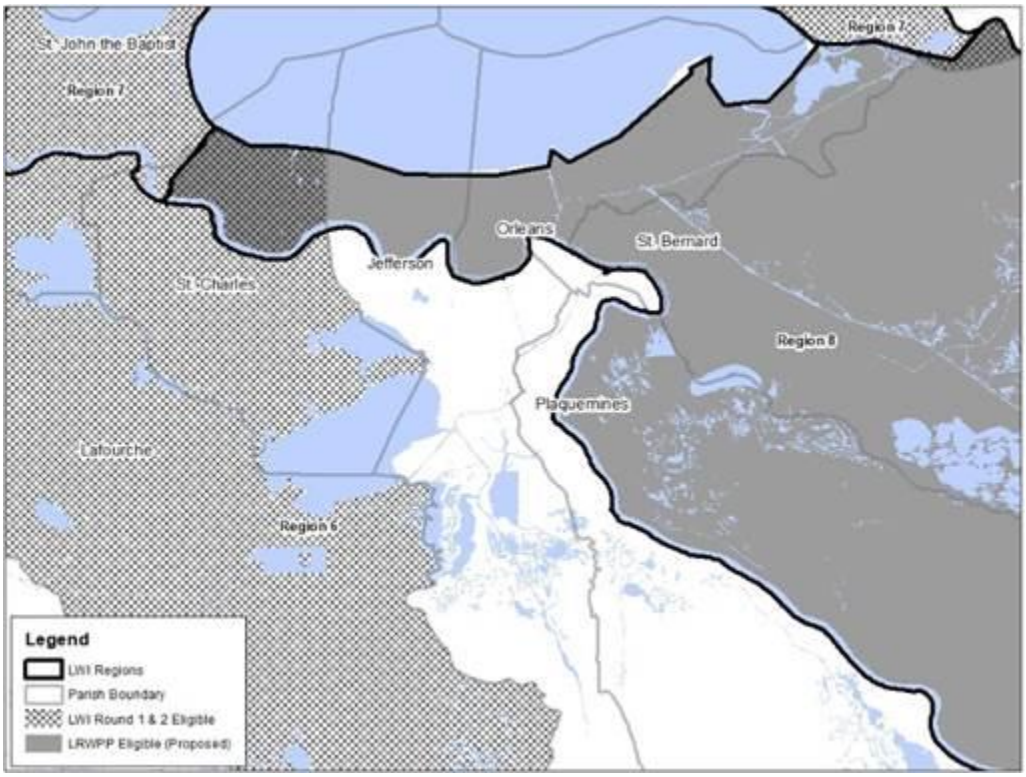
**COMMENT**: The Regional Planning Commission is submitting the attached public comment in response to Substantial Action Plan Amendment No. 3 in Response to 2020 and 2021 Federal Declarations. The text of the comment is also copied below:

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

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

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

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




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

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

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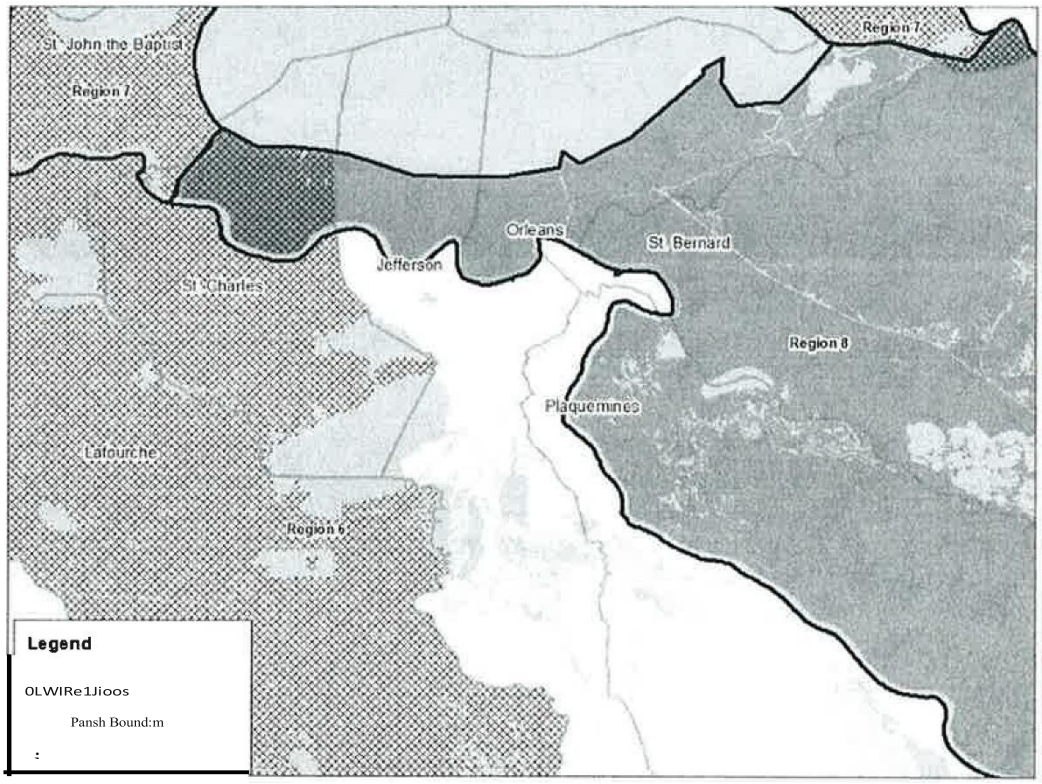


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We welcome feedback and response from HUD and OCD, and appreciate your consideration of this request.

RESPONSE: Thank you for your comment. The state will modify the program description to include region 8 and the HUD MID parishes of Jefferson, Orleans, Plaquemines, St. Mary and Terrebonne. These IDA HUD

MID parishes were not eligible for the CDBG-MIT grant funds, and this will enable those areas to implement mitigation projects in alignment with the Louisiana Watershed Initiative.

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

**Rental assistance programs:**

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

SLLS applauds the infusion of $8.4 million into the Permanent Supportive Housing program and $10 million into the Rapid Rehousing program. Both of these programs are invaluable resources for SLLS clients. In the

Rapid Rehousing program funds may be used for up to three months of rental assistance, or up to 24 months, with a waiver, security deposits, rental and utility arrearages, and application and background check fees charged when applying for housing. Households qualify if homeless or individuals living in hotels or temporary FEMA housing. SLLS is concerned that these programs exclude an important group of housing unstable individuals, namely those who are not people with disabilities and therefore ineligible for PSH, and who are severely housing unstable but not homeless by HUD's definition. For example, SLLS has clients with young children who are living doubled up with family, severely cost burdened, or living in unsafe or uninhabitable living conditions post-disaster. These families are also in desperate need of rental assistance. SLLS recommends that OCD expand the definition of "housing unstable" to include families that are doubled up, severely cost burdened, or living in uninhabitable living conditions post-disaster. This category should include families who received a project-based HUD or USDA subsidy pre-storm, whose housing was damaged, and who have not been provided with an adequate replacement subsidy.

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

**Rental housing development programs:**

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

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

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

- Mandatory acceptance of Section 8 Housing Choice Vouchers and other tenant-based subsidies;
- Good cause eviction protection;
- Prohibition on waiver of notice before eviction;
- Mandatory cure clauses in leases;
- Periodic inspections and oversight to ensure properties meet health, safety, and minimum property maintenance standards;
- Mandatory compliance with LHC's new criminal background screening requirements and review of tenant selection plans;
- Limitation on lookback period for eviction screening and prohibition on denials based on rent debt or evictions that occurred during the COVID emergency period.

**Comment on Proposed Flood Insurance Program:**

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

First, we recommend expanding the maximum insurance coverage from $2,000 by implementing a no maximum policy, as insurance premiums are projected to drastically increase due to FEMA's new flood insurance premium calculation system (Risk Rating 2.0).With FEMA's Risk Rating 2.0, flood insurance

rates can increase up to 18% annually, but many residents will end up paying much more.[1] As a result of these slated spikes in flood insurance, a

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

few lawsuits[2] have been filed. Specifically, in April 2023, St. Charles Parish filed suit, alleging the average cost of flood insurance there will shift from $815 to $2,766 annually.[3] The Times- Picayune calculated an average increase in flood insurance premiums of 134% throughout Louisiana with some individuals being forced to pay a tenfold increase.[4] For example, under the new system, the projected average full-risk premium for a single-family home will increase from $766 to $1,700.[5] Given these estimates, the proposed insurance premium coverage maximum of $2,000 is inadequate. Removing the insurance premium coverage maximum will ensure relief for the most vulnerable grantees regardless of the outcome of these pending lawsuits.

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

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

insurance on their own after the program ends. Expanding the program's year-long insurance premium coverage would help guarantee the success of the program's purpose and better assist the most vulnerable grantees.

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

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

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

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

[3] *Id*.

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

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

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

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

The program could also create a discretionary mechanism for increasing the maximum on a case- by-case basis. Additionally, increasing the overall program budget for the Soft Second Mortgage program would increase the number of participants and provide the funds necessary to raise the

$5,000 maximum assistance per unit for down payment and closing costs.

**Conclusion**

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

RESPONSE:

OCD appreciates SLLS's thoughtful analysis as well as its continuing partnership in serving those more vulnerable to the consequences of disasters. Certain of the recommendations are addressed at items that result from budgetary considerations and others addressed at items to be covered in policy or program documents (rather than at the action plan level). As programs are implemented, OCD will continue to review the impact of the

programs and whether any limitations may be loosened or additional funding if available should be redirected to the programs. Regarding particular recommendations, OCD notes as follows:

Rapid Rehousing/PSH:

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

Affordable Housing: Affordability Periods:

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

Tenant Protections:

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

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# 6. ATTACHMENTS

## I. OCD DISASTER OUTREACH MEETINGS, 2020 AND 2021

### 2020/2021 Disasters Outreach Meetings

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| November 5 & 6, 2020 | Louisiana Office of Community Development | All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc. | Sessions 1 - Just-In-Time (JIT) Recovery Training conducted by OCD/FEMA/GOSHEP |
| November 19, 2020 | Calcasieu Parish | Calcasieu Parish officials, OCD, GOSHEP, FEMA | Calcasieu/State/FEMA Meeting re: Long Term Recovery Priorities |
| January 8, 2021 | Louisiana Office of Community Development | OCD/GOSHEP/FEMA, Calcasieu Parish, Rowdy Gaudet/Emergent Method | To discuss support & training needs for Calcasieu's organization of local RSF chairs/committee, consistent with the NDRF, & process forward |
| January 13 & 14, 2021 | Louisiana Office of Community Development | All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc. | Session 2 - Just-In-Time (JIT) Recovery Training OCD/FEMA/GOSHEP |
| February 4, 2021 and March 11, 2021 | Louisiana Office of Community Development/RSF 1 Planning & Capacity | OCD, GOSHEP, FEMA, Federal partners SWLA officials, AIA, APA, CPRA, IMCAL Planning District, LSU, Water Institute, Watershed | RSF 1 full meetings/technical assistance Laura recovery issues with SWLA |
| February 11, 2021 | Calcasieu Parish | All local Calcasieu parish RSF co-chairs & committee members, OCD, GOSHEP, FEMA | Kick-Off/Training for Calcasieu Parish RSF/NDRF Orientation Meeting |
| March 8, 2021 | Louisiana Office of Community Development | SWLA Foundation, OCD housing staff, P. Forbes | Technical assistance for SWLA Foundation in launching |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | | Calcasieu/Cameron Long Term Recovery Planning process with specific focus on housing |
| April 6 & 7, 2021 | Louisiana Office of Community Development | All Impacted Laura/Delta/Zeta Communities: officials, parish administrators, grant & permit directors, EOC personnel, financial staff, etc. | Session 3 - Just-In-Time (JIT) Recovery Training OCD/FEMA/GOSHEP |
| March 25, 2021 & April 8, 2021 | IRC OCD/GOSHEP/FEMA | Calcasieu Parish key staff & local RSF co-chairs, R. Gaudet/Emergent Method | Updates/technical assistance needed on issues re: Calcasieu Parish RSF committee planning process |
| April 14, 2021 | Louisiana Office of Community Development | Calcasieu/Lake Charles/Cameron officials/staff, AIA, DOTD, McNeese University. SWLA Foundation, IMCAL, DOTD, AIA, All Impacted Laura Communities | Set up demonstration of FEMA Mitigation Tool to use in SWLA planning/recovery |
| April 21 & 22, 2021 | Louisiana Office of Community Development/RSF 1/AIA | Statewide architects, engineers, RSF 1 members, All impacted Laura/Delta/Zeta Communities | Two-day Resiliency Summit/Training |
| May 27, July 7, July 21, July 29, August 6, August 12, August 19, September 2, October 28, 2021***<br><br>***Event(s) deferred by all parties re: Calcasieu rollout of rental program, Hurricane Ida impacts, etc. Update – Summit/Resource Fairs for Laura/Delta/Zeta and Ida now scheduled spring 2022 | Louisiana Office of Community Development | SWLA Foundation, Calcasieu Parish, HUD, OCD, GOSHEP, FEMA | Planning meetings to identify housing needs, Summit topics/speakers and Interactive resources for Resource Fair for impacted residents. |
| June 2, 2021 | Louisiana Office of Community Development | All Laura/Delta/Zeta Impacted communities, CISA, GOSHEP LA Planning Districts, McNeese State University | Set up briefing on "Increasing the Resilience of Electrical Systems in LA To Offset Hurricanes And Other |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | LMA, LSU, Watershed, CPRA, Public Service Commissioners | Hazards" conducted by Cybersecurity and Infrastructure Security Agency |
| June 20, 2021 | Louisiana Office of Community Development/RSF 1 | SWLA officials/staff, All other Laura/Delta/Zeta impacted communities, SWLA Foundation, IMCAL, AIA, APA, LFMA, LA GIS Council, GOSHEP, FEMA, HUD CISA, Watershed, LA Planning Districts, Auburn University, FEMA | Data Template Task Force kick-off meeting to discuss initiative to develop date templates – capacity/planning, economic development, health & human resources, housing, infrastructure & cultural/natural resources - to enable the state and local communities to assess vulnerability relative to (flood) risk, develop mitigation strategies, have access to data for federal/philanthropic grant support, etc. |
| July 27, 2021 | Louisiana Office of Community Development | Cameron Parish officials and staff | Special meeting set up for Cameron Parish to present/discuss Cameron Parish Coast A Zone Advisory Flood Information to use for planning purposes by FEMA Mitigation Section. |
| February – August 2021 | Calcasieu Parish Government | Calcasieu Parish Recovery Framework Recovery Support Function groups and various stakeholders | To facilitate and inform the development of Community Recovery Plan |
| August 11, 2021 | Louisiana Office of Community Development | OCD/Calcasieu Parish officials and Recovery Support Function members | Virtual briefing regarding the compilation of the Calcasieu Parish Long-Term Community Recovery Plan |
| October 27, 2021 | Louisiana Office of Community Development | Calcasieu Parish/Lake Charles/Cameron, other SWLA Laura impacted communities, SWLA Foundation, IMCAL Water Institute, Watershed Initiative | Briefing by National Park Service re: updates on project opportunities for SWLA region re: watershed, nature-based solutions |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| November 9, 2021 | Louisiana Office of Community Development/FEMA | Calcasieu Parish officials/staff, IRC OCD/GOSHEP/FEMA | To discuss SOW with Calcasieu Parish for contract support through FEMA, as part of the IRC Laura Recovery efforts, for identifying housing strategies to address blight, affordable housing, etc. |
| November 9, 2021 | Louisiana Office of Community Development | Federal/local/parish officials in areas impacted by federally declared disasters from 2020-2021 | Virtual and in-person briefing to provide input on federal recovery resources, including D-CDBG |
| November 23, 2021 | Louisiana Office of Community Development | OCD/Calcasieu Parish officials | Virtual briefing to provide status of federal CDBG funding |
| December 6, 2021 | SWLA Foundation | Members of the Master Plan Advisory Council (OCD member) for the Calcasieu/Cameron 50-Year Long Term Recovery Plan – OCD, locally elected officials, Economic Develop Council, IMCAL | In-person meeting to review implementation schedule, public meeting outreach strategies, responsibilities of the Council to validate/priority top ten priorities emanating from public input. |
| December 14, 2021 | Louisiana Office of Community Development | Statewide local/parish officials in areas impacted by federally declared disasters from 2020-2021 | Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates |
| December 16, 2021 | Louisiana Office of Community Development | Statewide local/parish officials in areas impacted by federally declared disasters from 2020-2021 | Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates |
| January 19, 2022 | Louisiana Office of Community Development | Calcasieu/Cameron officials and staff | Virtual briefing to provide status of federal CDBG funding and Restore Louisiana program updates |
| January 25, 2022 | Louisiana Office of Community Development | GOHSEP's Hurricane Laura Direct Housing Recertification team | To identify unmet needs |
| January 26, February 3, 2022 | SWLA Foundation | Master Plan Advisory Council/OCD | Working meetings based on public input, resulting in the identification of the top ten |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | | (10) cross-cutting recovery priorities for the 50-year long term recovery plan. |
| February 16, 2022 | Louisiana Office of Community Development***<br><br>***Two others being scheduled with Vermilion Parish Economic Development Council (economic development focus) and Kisatchie Delta Planning District (watershed). | City of Lafayette, Acadiana Planning Commission, OCD, Watershed Initiative, GOSHEP, EPA, FEMA | To discuss technical assistance to be provided Lafayette as a result of Letter of Interest submitted for assessing best placement for watershed projects |

## Emergency Rental Assistance Program Outreach

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| January 20, 2021 | Louisiana Office of Community Development | Louisiana statewide/local elected and appointed government officials | Statewide virtual briefing about federal CDBG Emergency Rental Assistance Program funding |
| January 21, 2021 | Louisiana Office of Community Development | Louisiana statewide parish government officials | Statewide virtual briefing about federal CDBG Emergency Rental Assistance Program funding |
| January 22, 2021 | Louisiana Office of Community Development | Housing advocate stakeholders | Statewide virtual round table discussion about federal CDBG Emergency Rental Assistance Program funding |
| March 29, 2021 | Louisiana Office of Community Development | Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program | Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding |
| March 31, 2021 | Louisiana Office of Community Development | Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program | Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding |
| April 6, 2021 | Louisiana Office of Community Development | Stakeholders and members of the general public seeking | Statewide virtual briefing to provide status of federal |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | information about the Emergency Rental Assistance Program | CDBG Emergency Rental Assistance funding |
| April 8, 2021 | Louisiana Office of Community Development | Stakeholders and members of the general public seeking information about the Emergency Rental Assistance Program | Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding |
| May 11 and 13, 2021 | Louisiana Office of Community Development | Property owner, realtor, and landlord stakeholders | Statewide virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding for property owners |
| May 12, 2021 | Louisiana Office of Community Development | Statewide Utility Providers | Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding with utility expansion |
| June 4, 2021 | Louisiana Office of Community Development | Statewide Utility Providers | Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding with utility expansion |
| May 2021 – June 2021 (bi-weekly) | Louisiana Office of Community Development | Local government official representing parishes administering their own Emergency Rental Assistance Programs | Virtual briefing to provide status of federal CDBG Emergency Rental Assistance funding to 7 local government official representing parishes administering their own Emergency Rental Assistance Programs |
| June 1, 2, 3, 7, 8, 11, 14, and 18, 2021 | Louisiana Office of Community Development | Members of the public seeking CDBG assistance at ten in-person Emergency Rental Assistance Program application assistance events | Provide in-person help in ten Louisiana communities to members of the general public applying for CDBG Emergency Rental Assistance |
| August 31, 2021 | Louisiana Office of Community Development | Louisiana Bar Association members for Continuing Legal Education session | Provide Louisiana judges and court representatives with resources and information about CDBG Emergency Rental Assistance funding |

| DATE | HOST | ATTENDEES | PURPOSE |
| --- | --- | --- | --- |
| August 3, 2021 | Louisiana Office of Community Development | Louisiana Association of United Ways | Provide information, talking points, and FAQs related to the CDBG Emergency Rental Assistance Program funding for renters and landlords for statewide 211 helpline. |

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# II. 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, | Urgency of debris removal of vessels from waterways, funding, permits, funding available for long-term recovery |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | Local Engineers, U.S. Army Corps of Engineers | |
| February 9, 2022 and March 15, 2022 | RSF 1 OCD/FEMA<br>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<br>Town of Jean LaFitte | Mayor Timothy Kerner Jr.<br>CFM manager, capital Projects Director, GOSHEP | Coordination, state/local capacity building for recovery, financial assistance |
| February 22, 2022 | RSF 1 OCD/FEMA<br>Crown Plaza Hotel<br>Baton Rouge | Louisiana Municipal Association<br>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<br>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<br>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<br>Council Chambers<br>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 |

| DATE | HOST | ATTENDEES | PURPOSE |
|---|---|---|---|
| | | | 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 |

# III. UNMET HOUSING NEEDS

To calculate unmet housing needs, the state broadly analyzed populations in four distinct categories: 1) wind-damaged homeowners reported not to carry a hazard insurance policy; 2) wind-damaged homeowners reported to carry a hazard insurance policy; 3) flood-damaged homeowners reported not to carry an NFIP policy; 4) flood-damaged homeowners reported to carry an NFIP policy. For the purposes of this analysis, the state assumes populations carrying an insurance policy appropriate to their type of documented storm damages will have 80 percent of their damages covered by their insurance policies. Therefore, needs for these populations have been discounted to 20 percent of those for uninsured populations. Unmet needs for renter households are calculated by proportion from the final homeowner unmet needs.

Moreover, this analysis contemplates known sources of assistance. For example, 'FVL-HA' calculates the difference between a recorded FEMA Verified Loss and Housing Assistance disbursed through the FEMA IA program. Then, once a damage multiplier is applied to that remainder based on differences in FEMA and SBA inspections, approved SBA loan totals are subtracted from the needs total prior to calculating an unmet need total for each of the four respective populations. Lastly, only Major-Severe damage categories are used in the calculation of Unmet Needs. The following sets of tables include calculations of Unmet Housing Needs for the following models:

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## Laura

| WIND-DAMAGED HOMEOWNERS (UNINSURED) | | | | | | |
|---|---|---|---|---|---|---|
| **Categories** | **Count** | **FVL-HA** | **Multiplier** | **Losses** | **SBA Loan** | **Unmet Need** |
| Severe | 263 | $7,226,397.37 | 3.1 | $22,445,863.86 | $(2,898,300.00) | $19,547,563.86 |
| Major-High | 401 | $2,580,801.18 | 7.9 | $20,429,311.91 | $(3,289,600.00) | $17,139,711.91 |
| Major-Low | 3,254 | $10,359,376.19 | 8.8 | $90,805,778.17 | $(23,358,000.00) | $67,447,778.17 |
| Minor-High | 3,716 | $5,896,554.89 | 11.7 | $69,134,099.64 | $(15,363,600.00) | $53,770,499.64 |
| Minor-Low | 3,537 | $2,031,859.74 | 21.4 | $43,507,243.38 | $(9,446,600.00) | $34,060,643.38 |
| Total | 11,171 | $28,094,989.37 | | $246,322,296.96 | $(54,356,100.00) | $191,966,196.96 |
| Major-Severe Only | 3,918 | $20,166,575 | 20 | $133,680,954 | $(29,545,900) | $104,135,054 |

| WIND-DAMAGED HOMEOWNERS (INSURED) | | | | | | |
|---|---|---|---|---|---|---|
| **Categories** | **Count** | **FVL-HA** | **Multiplier** | **Losses** | **SBA Loan** | **Unmet Need** |
| Severe | 40 | $2,319,760.78 | 3.1 | $7,205,393.23 | $(1,998,200.00) | $1,041,438.65 |
| Major-High | 34 | $612,554.97 | 7.9 | $4,848,911.51 | $(562,600.00) | $857,262.30 |
| Major-Low | 776 | $8,477,599.59 | 8.8 | $74,310,944.37 | $(14,205,200.00) | $12,021,148.87 |
| Minor-High | 1487 | $8,050,098.83 | 11.7 | $94,383,304.32 | $(13,048,045.00) | $16,267,051.86 |
| Minor-Low | 1431 | $2,308,702.56 | 21.4 | $49,435,146.63 | $(9,385,100.00) | $8,010,009.33 |
| Total | 3,768 | $21,768,716.73 | | $230,183,700.05 | $(39,199,145.00) | $38,196,911.01 |
| Major-Severe Only | 850 | $11,409,915 | 20 | $86,365,249 | $(16,766,000) | $13,919,850 |

| FLOOD-DAMAGED HOMEOWNERS (UNINSURED) | | | | | | |
|---|---|---|---|---|---|---|
| **Categories** | **Count** | **FVL-HA** | **Multiplier** | **Losses** | **SBA Loan** | **Unmet Need** |
| Severe | 108 | $2,454,344.69 | 3.1 | $7,623,423.40 | $(1,263,000.00) | $6,360,423.40 |
| Major-High | 74 | $1,013,904.97 | 7.9 | $8,025,949.86 | $ - | $8,025,949.86 |
| Major-Low | 296 | $1,531,813.96 | 8.8 | $13,427,213.77 | $(978,400.00) | $12,448,813.77 |
| Minor-High | 111 | $292,764.25 | 11.7 | $3,432,511.56 | $(450,000.00) | $2,982,511.56 |
| Minor-Low | 99 | $84,083.93 | 21.4 | $1,800,449.08 | $(249,600.00) | $1,550,849.08 |
| Total | 688 | $5,376,911.80 | | $34,309,547.68 | $(2,941,000.00) | $31,368,547.68 |
| Major-Severe Only | 478 | $5,000,064 | 20 | $29,076,587 | $(2,241,400) | $26,835,187 |

| FLOOD-DAMAGED HOMEOWNERS (INSURED) | | | | | | |
|---|---|---|---|---|---|---|
| **Categories** | **Count** | **FVL-HA** | **Multiplier** | **Losses** | **SBA Loan** | **Unmet Need** |
| Severe | 38 | $1,910,881.83 | 3.1 | $5,935,377.09 | $(1,325,300.00) | $922,015.42 |
| Major-High | 24 | $386,517.79 | 7.9 | $3,059,628.36 | $(414,300.00) | $529,065.67 |
| Major-Low | 55 | $502,044.33 | 8.8 | $4,400,701.86 | $(611,900.00) | $757,760.37 |
| Minor-High | 8 | $53,735.63 | 11.7 | $630,022.86 | $(77,800.00) | $110,444.57 |
| Minor-Low | 12 | $23,341.41 | 21.4 | $499,798.48 | $(143,800.00) | $71,199.70 |
| Total | 137 | $2,876,520.99 | | $14,525,528.66 | $(2,573,100.00) | $2,390,485.73 |
| Major-Severe Only | 117 | $2,799,444 | 20 | $13,395,707 | $(2,351,500) | $2,208,841 |

## Delta

| WIND-DAMAGED HOMEOWNERS (UNINSURED) | | | | | | |
|---|---|---|---|---|---|---|
| **Categories** | **Count** | **FVL-HA** | **Multiplier** | **Losses** | **SBA Loan** | **Unmet Need** |
| Severe | 41 | $1,623,187.32 | 2.8 | $4,489,968.26 | $ - | $4,489,968.26 |
| Major-High | 65 | $714,065.98 | 5.8 | $4,148,050.40 | $(271,500.00) | $3,876,550.40 |
| Major-Low | 593 | $2,776,990.54 | 9.0 | $25,055,714.19 | $(1,396,700.00) | $23,659,014.19 |
| Minor-High | 994 | $1,890,471.02 | 9.8 | $18,567,258.24 | $(1,141,700.00) | $17,425,558.24 |
| Minor-Low | 1,310 | $592,855.82 | 22.6 | $13,392,101.97 | $(1,139,500.00) | $12,252,601.97 |
| Total | 3,003 | $7,597,570.68 | | $65,653,093.05 | $(3,949,400.00) | $61,703,693.05 |
| Major-Severe Only | 699 | $5,114,244 | 18 | $33,693,733 | $ (1,668,200) | $32,025,533 |

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| WIND-DAMAGED HOMEOWNERS (INSURED) | | | | | | |
|---|---|---|---|---|---|---|
| Categories | Count | FVL-HA | Multiplier | Losses | SBA Loan | Unmet Need |
| Severe | | | | | | |
| Major-High | 6 | $118,656.15 | 5.8 | $689,280.41 | $ - | $137,856.08 |
| Major-Low | 61 | $701,209.66 | 9.0 | $6,326,744.21 | $(216,900.00) | $1,221,968.84 |
| Minor-High | 227 | $825,486.44 | 9.8 | $8,107,513.81 | $(605,100.00) | $1,500,482.76 |
| Minor-Low | 407 | $555,829.43 | 22.6 | $12,555,707.73 | $(1,593,400.00) | $2,192,461.55 |
| Total | 701 | $2,201,181.68 | | $27,679,246.16 | $(2,415,400.00) | $5,052,769.23 |
| Major-Severe Only | 67 | $819,866 | 18 | $7,016,025 | $ (216,900) | $1,359,825 |

| FLOOD-DAMAGED HOMEOWNERS (UNINSURED) | | | | | | |
|---|---|---|---|---|---|---|
| Categories | Count | FVL-HA | Multiplier | Losses | SBA Loan | Unmet Need |
| Severe | 33 | $973,775.67 | 2.8 | $2,693,602.76 | $(342,100.00) | $2,351,502.76 |
| Major-High | 79 | $919,757.40 | 5.8 | $5,342,923.70 | $(684,900.00) | $4,658,023.70 |
| Major-Low | 387 | $1,852,660.84 | 9.0 | $16,715,843.94 | $(2,120,000.00) | $14,595,843.94 |
| Minor-High | 100 | $171,493.27 | 9.8 | $1,684,320.89 | $(50,000.00) | $1,634,320.89 |
| Minor-Low | 118 | $108,110.79 | 22.6 | $2,442,129.56 | $(359,000.00) | $2,083,129.56 |
| Total | 717 | $4,025,797.97 | | $28,878,820.85 | $(3,556,000.00) | $25,322,820.85 |
| Major-Severe Only | 499 | $3,746,194 | 18 | $24,752,370 | $(3,147,000) | $21,605,370 |

| FLOOD-DAMAGED HOMEOWNERS (INSURED) | | | | | | |
|---|---|---|---|---|---|---|
| Categories | Count | FVL-HA | Multiplier | Losses | SBA Loan | Unmet Need |
| Severe | 7 | $211,551.67 | 2.8 | $585,182.17 | $ - | $117,036.43 |
| Major-High | 15 | $285,888.55 | 5.8 | $1,660,743.05 | $(222,100.00) | $287,728.61 |
| Major-Low | 122 | $1,077,056.01 | 9.0 | $9,717,860.81 | $(579,200.00) | $1,827,732.16 |
| Minor-High | 24 | $135,261.84 | 9.8 | $1,328,473.96 | $(71,100.00) | $251,474.79 |
| Minor-Low | 16 | $20,106.08 | 22.6 | $454,179.02 | $(84,500.00) | $73,935.80 |
| Total | 184 | $1,729,864.15 | | $13,746,439.01 | $(956,900.00) | $2,557,907.80 |
| Major-Severe Only | 144 | $1,574,496 | 18 | $11,963,786 | $(801,300) | $2,232,497 |

# IV. IMPACT ON HOMELESS POPULATIONS

The impact of natural disasters on the housed population and on people experiencing sheltered homelessness is very different from the impact on people experiencing unsheltered homelessness.

When a natural disaster damages a housing unit, its inhabitant can hypothetically be made whole by insurance or FEMA.

When a natural disaster damages a shelter or broader infrastructure, beds can be rendered uninhabitable, but eventually, those beds can be regained via repair and recovery operations.

For people experiencing unsheltered homelessness (e.g. living on the streets), however, the impact is more difficult to see. A natural disaster cannot remove housing or shelter from a person without housing or shelter; instead, it destroys future housing opportunities. One of the primary barriers to permanent housing in any geography is a lack of affordable housing. When a natural disaster damages or destroys more than half of an area's affordable housing, as Hurricanes Laura and Delta did in Lake Charles and Hurricane Ida in Houma, it creates a housing cost and availability crisis that prevents people experiencing homelessness from achieving and stabilizing permanent housing.

*2020 and 2021 Storms*

The 2020 and 2021 hurricanes that devastated Louisiana will leave a legacy on homelessness in the state. For the estimated 50% of people experiencing homelessness who could return to housing without a public subsidy, there will no longer be housing available.

The Point-in-time (PIT) Count is an annual census of sheltered and unsheltered homeless persons on a single night conducted by Continuums of Care (CoC) across the United States https://www.hudexchange.info/programs/hdx/pit-hic/. Louisiana has seven Continuums of Care, which are regional planning bodies that coordinate housing and services for people experiencing homelessness https://laboscoc.org/housing-and-services. Hurricanes Laura, Delta, and Zeta of 2020 primarily impacted parishes in the Louisiana Balance of State Continuum of Care (LA BOSCOC)'s Lake Charles Region, although it also impacted the Monroe, Lafayette, CENLA, LA BOSOC Natchitoches/Sabine Region and CENLA CoCs. Hurricane Ida impacted parishes in the LA BOSCOC's Houma, Baton Rouge and St. Bernard/Plaquemines Regions, while also leaving significant damage in Unity and Northlake's CoCs.

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## Point in Time (PIT) Count Data -- Homelessness in Impacted Parishes

| CONTINUUMS OF CARE CONTAINING FEMA IA DECLARED PARISHES | 2017 | 2018 | 2019 | 2020 |
|---|---|---|---|---|
| LA BOSCOC: Includes Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes | **706** | **575** | **593** | **757** |
| Monroe CoC: includes Jackson, Lincoln, Morehouse, Ouachita & Union Parishes | **185** | **187** | **188** | **162** |
| CENLA CoC: includes Grant, LaSalle, Rapides, Vernon & Winn Parishes | **159** | **177** | **114** | **107** |
| Unity CoC: includes Jefferson and Orleans Parishes | **1,301** | **1,188** | **1,179** | **1,314** |
| Lafayette CoC: includes Acadia, St. Landry, St. Martin & Vermilion | **357** | **363** | **360** | **417** |
| Northlake CoC*: includes Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes | **248** | **194** | **215** | **118** |
| Total PIT Count ** | **2,956** | **2,684** | **2,649** | **2,875** |

** CoC-wide PIT data includes both impacted and non-impacted parishes. Note that 2018 and 2019 saw snow and sleet on the PIT Count date (unusual in Louisiana), which likely depressed results.*
***To date, some providers in the following FEMA IA declared parishes have not yet reported financially recoupable damages: Caddo (Shreveport CoC), Natchitoches and Sabine (LA BOSCOC Natchitoches/Sabine Region)*

## LA BOSCOC Regions

According to the Southwest Louisiana AIDS Council (SLAC), one of the best-funded service providers in the Lake Charles region, more than 50% of their 425 participants were displaced.

In the Houma Region, Terrebonne Parish Consolidated Government reported $750,000 in damage to their shelter for women and children. The Haven Domestic Violence shelter in this region saw estimated damages of approximately $10,000 to their facility. And approximately 50% of participants in permanent supportive housing and rapid rehousing programs saw damages to their units and now have to search for new housing in a region with an already depleted housing inventory. Just weeks prior to Ida making landfall, 60 households were referred to a permanent housing provider and in the weeks following the storm, only about 20 of them have been able to been contacted, most likely displaced to other regions of the state.

Meeting LA BOSCOC's Unmet Need requires **$9,697,600** to reopen 208 ES beds (traditional), create 300 ES beds (NCS) for displaced people, repair outreach and drop-in centers that serve approximately 100 households per month, and add six full time street outreach workers to divert people from the overloaded and diminished homeless response network.

## Monroe CoC

This CoC's emergency shelter bed availability was already inadequate before the COVID-19 pandemic; post-pandemic, shelter bed availability dropped 25.2% (25 beds) due to implementing HUD's social distancing best practices and due to canceled annual fundraising events. Moreover, three of four parishes impacted by Hurricane Laura have no shelter beds at all.

Meeting Monroe CoC's Unmet Need requires $500,000 to create 40 new shelter beds in Laura -impacted or -adjacent parishes.

## CENLA CoC

This CoC only has two street outreach workers to cover a total PIT population of 114 across more than six parishes, ensuring chronic under-counting in rural parishes. ES availability is particularly limited for women and families with children; the only available resource is hotel vouchers, which are unsustainably expensive.

The CENLA CoC also hosted Louisiana's largest congregate disaster shelter in Rapides Parish, the "Alexandria Megashelter." This has two primary impacts during and after a disaster:

1. All available hotel rooms and other housing stock were absorbed by shelter and disaster response workers;
2. The megashelter was disproportionately likely to attract and then locally discharge people experiencing homelessness.

Meeting CENLA CoC's Unmet Need requires $845,000 to add four full time outreach and diversion staff to rapidly identify people experiencing or at risk of homelessness and divert them away from more expensive interventions; and to maintain 60 Rapid Rehousing beds beyond 2020-2021 to ensure households do not return to homelessness.

## Lafayette CoC

Hurricane Laura evacuees and temporary workers utilized most of the available (and nearly all of the affordable) housing units in all impacted parishes. While no homeless services facilities were damaged by Hurricane Laura, the local network was at capacity before the disaster; since April 2020, CoC-wide homelessness had increased 83% and ES bed availability had decreased 68%. The impacted parishes were unable to shelter or house any additional people who lose or have lost housing due to Hurricane Laura, and the housing and shelter crisis will only increase as non-congregate shelters ramp down.

Meeting the Lafayette CoC's Unmet Need requires $980,000 to create 33 ES beds sufficient to meet the post-disaster unsheltered via existing structures, and to create 100 Rapid Rehousing beds to permanently house existing NCS participants to prevent additional strain as the system absorbs people impacted by Hurricane Laura.

## Total Homeless Population Unmet Need for 2020 and 2021 Hurricanes:

In summation, $12,172,605 is needed to:

- repair damage to existing resources, including structures and equipment;
- create new emergency shelter beds in existing structures, including non-congregate shelter, required to shelter people displaced by Hurricanes Laura and Ida;
- repair outreach and drop-in centers required to serve people experiencing unsheltered homelessness; and
- hire additional outreach workers and resource navigators to ensure people who are imminently at risk of homelessness are diverted back to permanent housing, including via homelessness prevention direct assistance.