STATE OF LOUISIANA

Proposed Master Action Plan

FOR THE UTILIZATION OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS

In Response to 2020 and 2021 Federal Declarations In Louisiana

LOUISIANA
Office of
COMMUNITY DEVELOPMENT

APRIL 1, 2022

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LOUISIANA
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ABSTRACT

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

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

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

REVIEW HISTORY

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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).

DISASTER SPECIFIC OVERVIEW

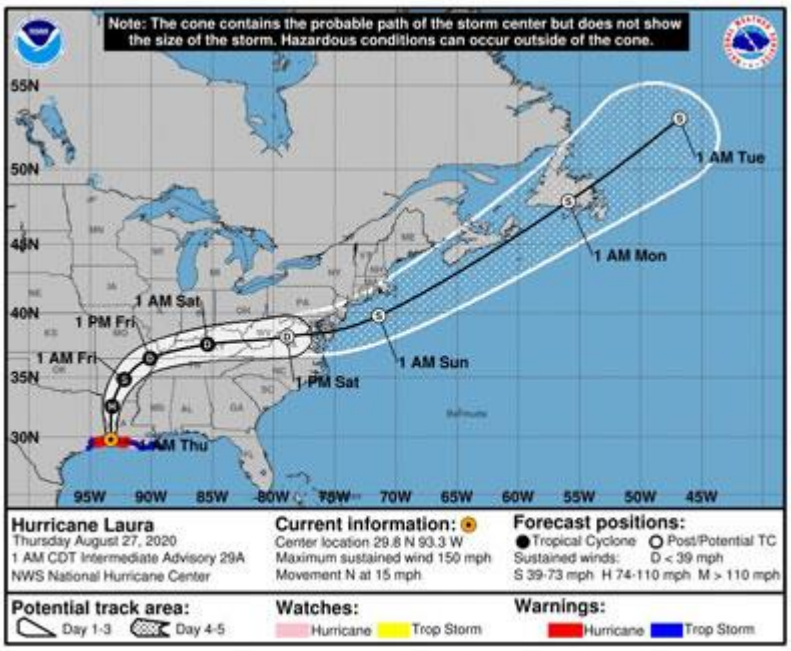
2020 STORMS

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)

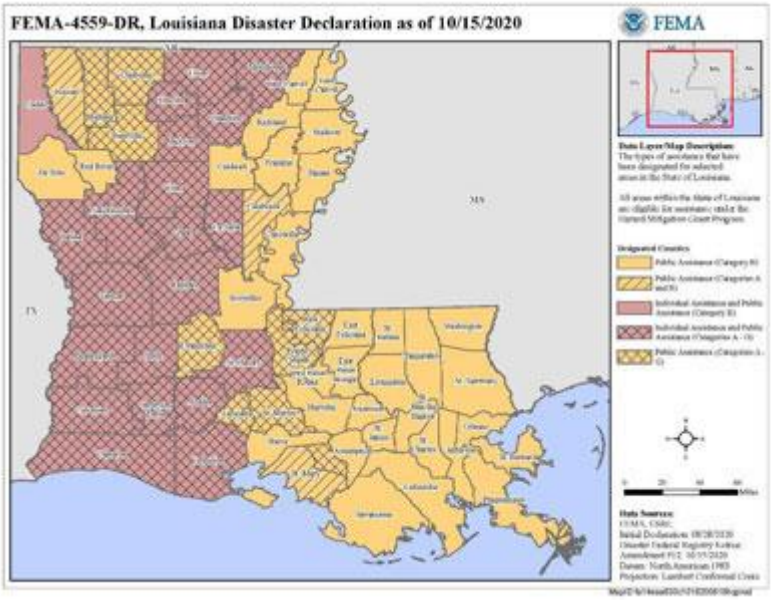
Hurricane Laura developed into a major Category 4 hurricane just hours before making landfall, despite its previous projection as a Category 2 storm. It had sustained winds of 150 miles per hour when it struck Cameron Parish on Thursday, August 27, 2020. Hurricane Laura is the strongest storm to make 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

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.

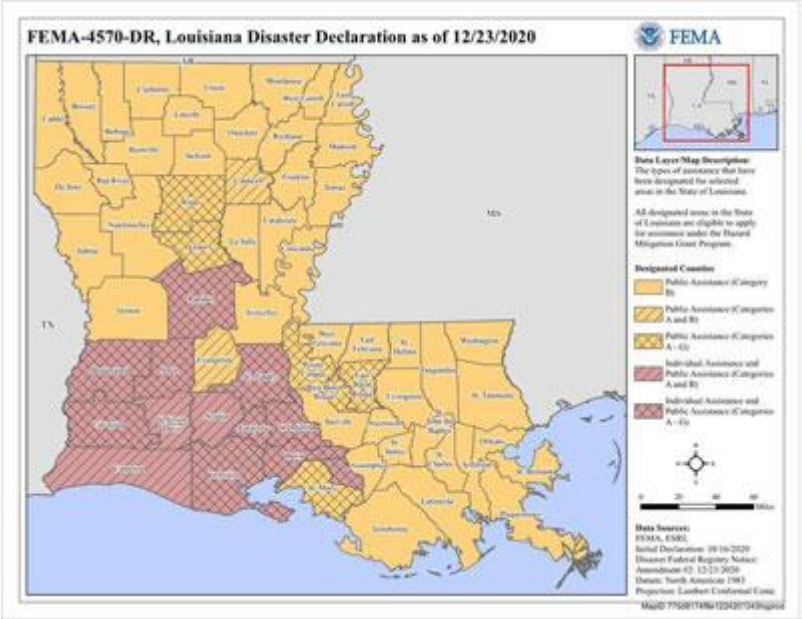
As recovery efforts continue throughout the impacted areas, lack of preparation for housing needs has left many essential workers with no place to stay post-disaster. With strains on the workforce, the region's importance as an energy hub to the entire nation also risks increased costs felt across the 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.

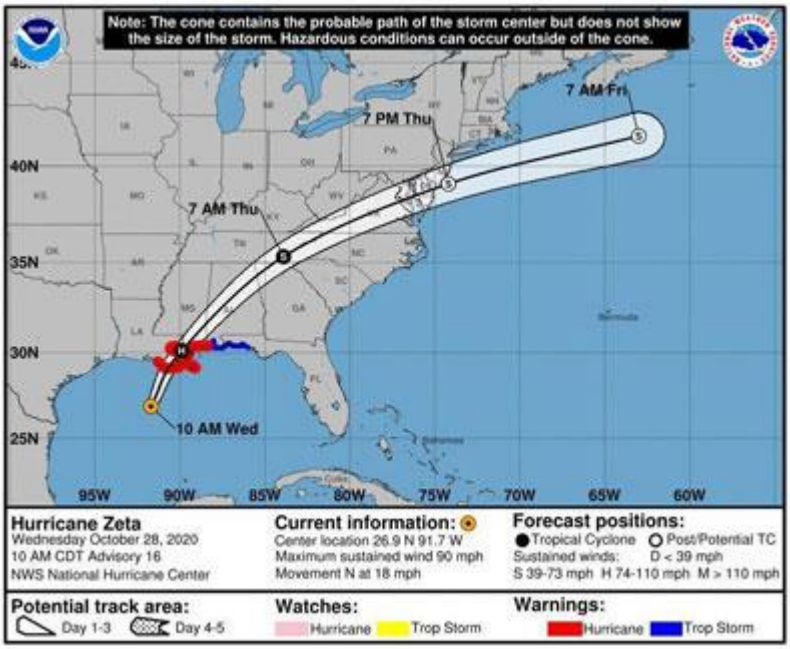
The immediate mass exodus of the population seen from Hurricane Laura with the potential for significant impacts to the population and workforce was exacerbated by the continued devastation of Hurricane Delta. Thousands of housing units in southwest Louisiana remain uninhabitable due to severe hurricane 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.

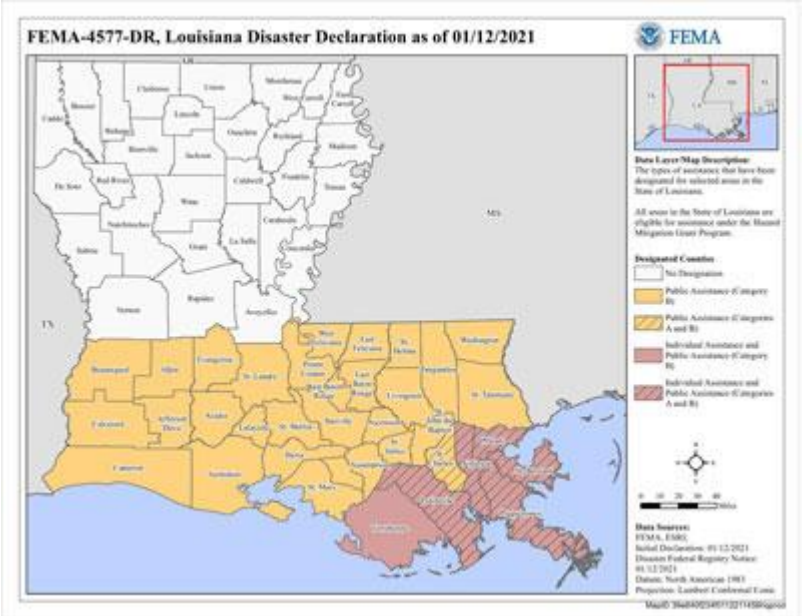
Hurricane Zeta (DR-4577)

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.

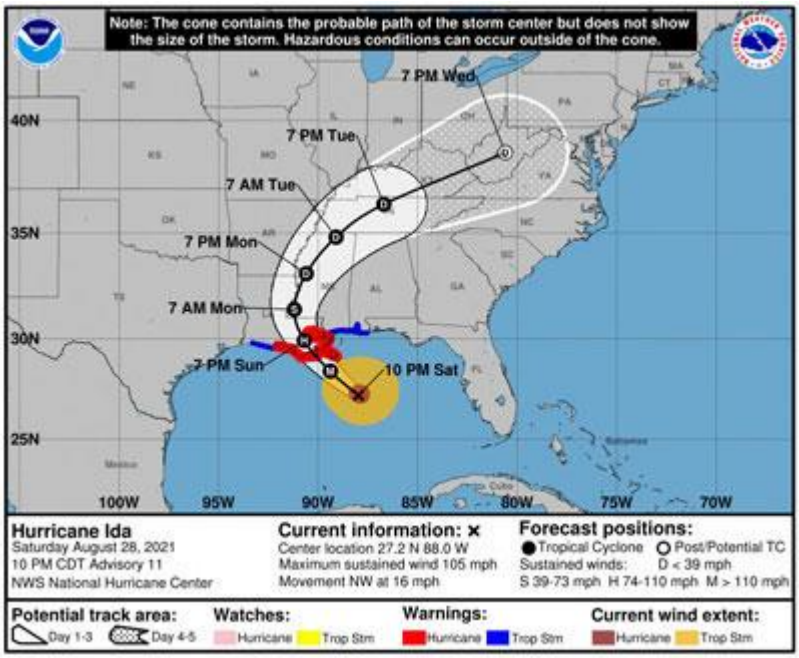
2021 STORMS

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)

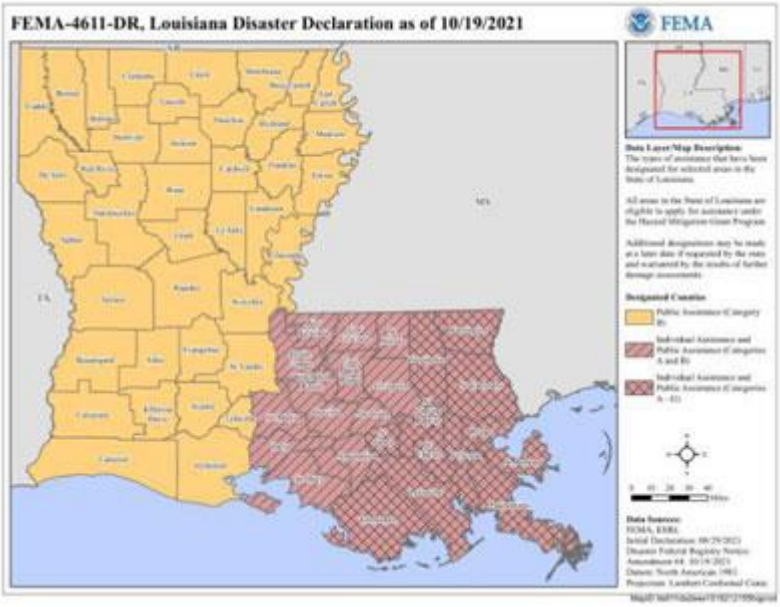
Hurricane Ida made landfall in Lafourche Parish on August 29, 2021, just shy of a Category 5 storm with sustained winds of 150 mph. Hurricane Ida is tied with Hurricane Laura in 2020 as the strongest hurricane to strike

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

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

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

SUMMARY

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

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

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

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

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

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

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

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

Grantee-Identified MID Areas

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

UNMET NEED AND PROPOSED ALLOCATIONS

The first funding allocation of $600 million for Hurricanes Laura and Delta was announced in October 2021, and the second allocation for an additional $450 million was announced in March 2022.

The state will submit the proposed action plan with the initial funding allocation of $600 million for Hurricanes Laura and Delta in May 2022. Currently, this is the only funding allocation that Louisiana has received official approval for in the Federal Register Notice issued on January 31, 2022. With the second allocation announcement in March, the state revised its proposed program budgets. Louisiana anticipates that HUD will issue the Federal Register Notice for the second allocation soon, at which time OCD will provide an amendment for the total, revised allocation amount of over $1 billion for Hurricanes Laura and Delta.

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.

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

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

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.

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

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

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

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

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

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

IMPACTS OF INSURANCE (HOI AND NFIP).

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

HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

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

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 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**	**$238,191,182**	

FEMA/SBA MULTIPLIER – DELTA

CATEGORY	COUNT	FVL	SBA	MULTIPLIER
Severe	7	$259,621	$718,149	2.8
Major-High	19	$374,415	$2,175,000	5.8
Major-Low	113	$1,308,204	$11,803,419	9.0
Minor-High	77	$466,943	$4,586,075	9.8
Minor-Low	124	$288,283	$6,512,059	22.6
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 (21 IA PARISHES)		DELTA (12 IA PARISHES)		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**	

AFFORDABLE HOUSING PROGRAM REQUIREMENTS

The Action Plan provides for several affordable rental programs. The requirements of these programs are in addition to the requirements of other funding sources for each project (such as LIHTC credits allocated through the Louisiana Housing Corporation). In connection with those programs, generally "Affordable Rents" for LMI

tenants by requiring grantees, subrecipients, or borrowers (as applicable) to adhere to the following affordable rent requirements:

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

INCOME REQUIREMENTS

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

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

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

FEMA IA OWNER OCCUPIED

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Acadia	4,434.00	1,643.00	1,287.00	880.00	$7,495,265.00	$5,824.00
Allen	4,575.00	1,675.00	1,384.00	961.00	$8,914,740.00	$6,441.00
Beauregard	9,103.00	3,132.00	2,674.00	2,006.00	$16,931,313.00	$6,332.00
Caddo	1,440.00	579.00	422.00	283.00	$2,954,913.00	$7,002.00
Calcasieu	59,133.00	19,825.00	16,661.00	10,783.00	$140,422,484.00	$8,428.00

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COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Cameron	3,449.00	1,731.00	1,458.00	1,020.00	$27,887,729.00	$19,127.00
Grant	2,594.00	712.00	597.00	430.00	$4,392,473.00	$7,358.00
Iberia	935.00	585.00	491.00	416.00	$2,185,784.00	$4,452.00
Jackson	945.00	172.00	117.00	90.00	$871,453.00	$7,448.00
Jefferson Davis	6,091.00	1,892.00	1,550.00	1,053.00	$10,808,877.00	$6,973.00
La Salle	1,166.00	118.00	83.00	57.00	$422,475.00	$5,090.00
Lafayette	2,978.00	1,066.00	883.00	650.00	$3,999,885.00	$4,530.00
Lincoln	1,291.00	259.00	189.00	115.00	$1,332,804.00	$7,052.00
Morehouse	713.00	266.00	221.00	162.00	$1,515,782.00	$6,859.00
Natchitoches	2,864.00	617.00	448.00	290.00	$2,622,338.00	$5,853.00
Ouachita	4,564.00	953.00	725.00	541.00	$4,298,467.00	$5,929.00
Rapides	10,571.00	2,762.00	2,160.00	1,514.00	$14,376,109.00	$6,656.00
Sabine	2,285.00	440.00	327.00	229.00	$1,854,902.00	$5,672.00
St. Landry	2,982.00	1,234.00	1,019.00	738.00	$5,003,878.00	$4,911.00
St. Martin	1,279.00	623.00	536.00	407.00	$2,323,967.00	$4,336.00
Union	1,428.00	272.00	203.00	156.00	$987,965.00	$4,867.00
Vermilion	3,418.00	1,358.00	1,110.00	815.00	$6,227,582.00	$5,610.00
Vernon	5,684.00	1,343.00	1,039.00	714.00	$5,975,335.00	$5,751.00
Winn	1,464.00	338.00	253.00	168.00	$1,525,535.00	$6,030.00
Total	**135,386.00**	**43,595.00**	**35,837.00**	**24,478.00**	**$275,332,055.00**	**$158,531.00**

Data Source(s): FEMA IA Data

FEMA IA TENANT APPLICANTS

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COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Acadia	2,734.00	1,200.00	835.00	464.00	$1,282,444.00	$1,536.00
Allen	2,092.00	917.00	465.00	378.00	$780,781.00	$1,679.00
Beauregard	3,071.00	1,568.00	763.00	739.00	$1,197,422.00	$1,569.00
Caddo	3,745.00	1,637.00	1,247.00	853.00	$2,621,760.00	$2,102.00
Calcasieu	57,887.00	39,267.00	24,686.00	20,374.00	$49,094,990.00	$1,989.00
Cameron	1,547.00	800.00	452.00	310.00	$1,370,756.00	$3,033.00
Grant	702.00	224.00	113.00	83.00	$245,720.00	$2,175.00
Iberia	395.00	140.00	101.00	56.00	$192,750.00	$1,908.00
Jackson	441.00	98.00	42.00	25.00	$73,263.00	$1,744.00
Jefferson Davis	2,933.00	1,313.00	779.00	457.00	$1,315,699.00	$1,689.00
La Salle	284.00	51.00	19.00	13.00	$32,031.00	$1,686.00
Lafayette	2,419.00	913.00	739.00	482.00	$1,142,154.00	$1,546.00
Lincoln	1,188.00	258.00	136.00	74.00	$205,964.00	$1,514.00
Morehouse	602.00	196.00	138.00	96.00	$290,341.00	$2,104.00
Natchitoches	1,940.00	641.00	379.00	202.00	$874,644.00	$2,308.00
Ouachita	4,917.00	1,496.00	967.00	608.00	$1,848,927.00	$1,912.00
Rapides	33,409.00	4,293.00	2,590.00	1,192.00	$5,399,205.00	$2,085.00
Sabine	672.00	171.00	96.00	60.00	$184,801.00	$1,925.00
St. Landry	2,349.00	1,151.00	886.00	462.00	$1,706,026.00	$1,926.00
St. Martin	472.00	226.00	189.00	123.00	$260,427.00	$1,378.00
Union	438.00	111.00	70.00	40.00	$194,539.00	$2,779.00
Vermilion	1,302.00	521.00	322.00	194.00	$528,984.00	$1,643.00
Vernon	4,299.00	1,234.00	582.00	409.00	$919,346.00	$1,580.00
Winn	639.00	203.00	116.00	70.00	$186,172.00	$1,605.00
Total	**130,477.00**	**58,629.00**	**36,712.00**	**27,764.00**	**$71,949,146.00**	**$45,415.00**

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Data Source(s): FEMA IA Data

FEMA IA APPLICATIONS BY HOUSING TYPE

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

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	9.00	110.00	7.00
Allen	255.00	249.00	13.00	165.00	8.00
Beauregard	606.00	465.00	36.00	353.00	22.00
Caddo	60.00	120.00	8.00	72.00	4.00

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

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	5,620.00	3,685.00	4,031.00	1,042.00	273.00
Cameron	47.00	60.00	82.00	43.00	37.00
Grant	18.00	16.00	21.00	10.00	0.00
Iberia	18.00	13.00	12.00	6.00	1.00
Jackson	14.00	4.00	5.00	1.00	1.00
Jefferson Davis	141.00	113.00	100.00	33.00	7.00
La Salle	5.00	1.00	5.00	0.00	0.00
Lafayette	200.00	122.00	122.00	25.00	6.00
Lincoln	26.00	23.00	16.00	1.00	0.00
Morehouse	22.00	28.00	21.00	4.00	3.00
Natchitoches	58.00	31.00	67.00	18.00	5.00
Ouachita	168.00	171.00	189.00	40.00	6.00
Rapides	390.00	334.00	391.00	105.00	22.00
Sabine	18.00	11.00	19.00	3.00	0.00
St. Landry	173.00	98.00	128.00	40.00	13.00
St. Martin	55.00	39.00	24.00	2.00	1.00
Union	14.00	5.00	10.00	3.00	3.00
Vermilion	66.00	36.00	47.00	11.00	4.00
Vernon	141.00	66.00	67.00	12.00	2.00
Winn	24.00	14.00	11.00	5.00	0.00
Total	**7,994.00**	**5,420.00**	**5,904.00**	**1,532.00**	**421.00**

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.*

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.

2. Public Housing and Affordable Housing

MULTIFAMILY HUD-ASSISTED HOUSING

TYPE OF DAMAGE	# OF PROPERTIES	# OF UNITS	# OF UNITS ASSISTED	# OF UNITS WAITING ASSISTANCE
Minor-Low	0.00	0.00	0.00	0.00
Minor-High	36.00	2,697.00	941.00	1,756.00
Major-Low	14.00	1,263.00	353.00	910.00
Major-High	0.00	0.00	0.00	0.00
Severe	15.00	1,537.00	752.00	785.00
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.*

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PUBLIC HOUSING AUTHORITIES DAMAGED

COUNTY	TOTAL # PHAS	TOTAL PHAS DAMAGED	# OF UNITS DAMAGED
All FEMA IA	63.00	17.00	1,046.00
Total	**63.00**	**17.00**	**1,046.00**

Data Source(s): HUD Exchange

OWNER WITH UNMET NEED IN A FLOODPLAIN

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

Data Source(s): This data is unavailable at this time.

INSURANCE CLAIMS AND LOSSES IN DISASTER IMPACTED AREAS

COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES ($)
Acadia	7,009.00	4,740.00	$67,396,341.00
Allen	4,669.00	3,168.00	$101,159,812.00
Beauregard	13,337.00	9,871.00	$289,264,431.00
Caddo	3,500.00	1,739.00	$18,563,131.00
Calcasieu	109,622.00	74,991.00	$5,389,945,848.00
Cameron	1,861.00	1,193.00	$166,659,827.00
Grant	2,900.00	2,068.00	$28,531,663.00
Iberia	2,885.00	1,860.00	$19,095,982.00
Jackson	1,199.00	704.00	$6,926,505.00
Jefferson Davis	7,274.00	5,036.00	$120,168,365.00

COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES ($)
La Salle	863.00	555.00	$5,383,382.00
Lafayette	19,288.00	11,839.00	$172,933,095.00
Lincoln	1,848.00	1,068.00	$12,911,806.00
Morehouse	1,437.00	907.00	$13,557,565.00
Natchitoches	2,622.00	1,605.00	$20,234,522.00
Ouachita	10,817.00	6,152.00	$81,347,159.00
Rapides	18,156.00	11,526.00	$175,428,783.00
Sabine	1,696.00	1,182.00	$14,666,470.00
St. Landry	6,276.00	4,299.00	$46,602,717.00
St. Martin	2,292.00	1,469.00	$14,534,567.00
Union	1,136.00	693.00	$6,969,343.00
Vermilion	6,309.00	4,500.00	$61,474,495.00
Vernon	8,964.00	6,678.00	$112,370,693.00
Winn	1,515.00	947.00	$17,770,520.00
Total	**237,475.00**	**158,790.00**	**$6,963,897,022.00**

Data Source(s): Louisiana Department of Insurance

TOTAL HOME LOANS APPROVED BY SBA

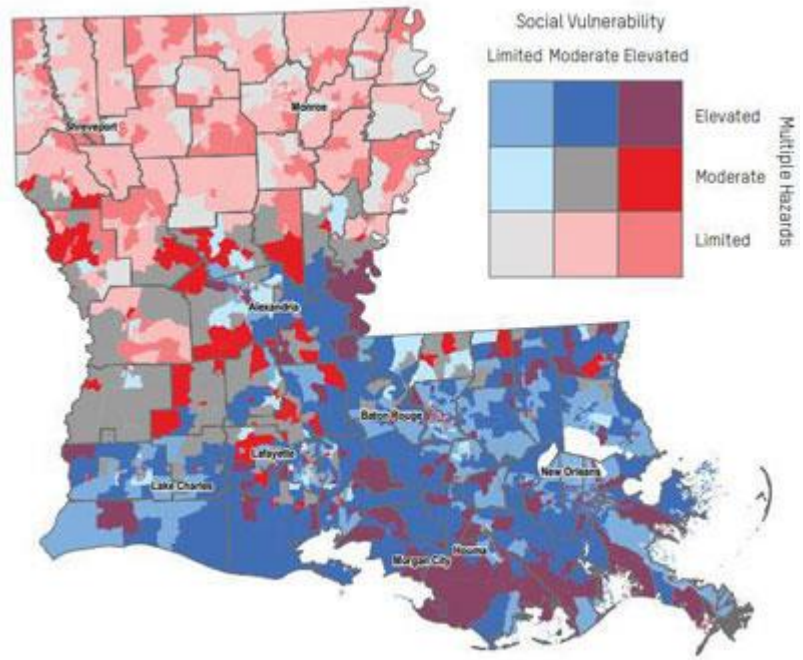
COUNTY	# OF HOME LOANS
Acadia	74.00
Allen	123.00
Beauregard	196.00
Caddo	99.00
Calcasieu	3,888.00
Cameron	192.00
Grant	69.00

COUNTY	# OF HOME LOANS
Iberia	2.00
Jackson	22.00
Jefferson Davis	166.00
La Salle	102.00
Lafayette	16.00
Lincoln	45.00
Morehouse	9.00
Natchitoches	55.00
Ouachita	192.00
Sabine	22.00
St. Landry	42.00
St. Martin	4.00
Union	11.00
Vermilion	28.00
Vernon	118.00
Winn	35.00
Total	**5,510.00**

Data Source(s): SBA

SOCIAL EQUITY, FAIR HOUSING AND CIVIL RIGHTS

It has long been recognized that storm and flood-related risk often corresponds with a high level of social vulnerability, compounding the impact of flood events with the challenges of poverty for many victims. Louisiana features extensive social vulnerability across the state, as well as extreme exposure to flood, storm, and coastal hazards. Further, many Louisiana residents have experienced multiple flood events, and, therefore, have been repeatedly subjected to interruptions in work when having to rebuild or relocate. This has long-term negative impacts on household wealth, mental health, and community cohesion.[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

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

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PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
East Baton Rouge	26%	14%	15%	18%	3%	Low
East Feliciana	21%	17%	15%	19%	31%	Moderate to High
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
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

LOUISIANA Office of COMMUNITY DEVELOPMENT

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
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

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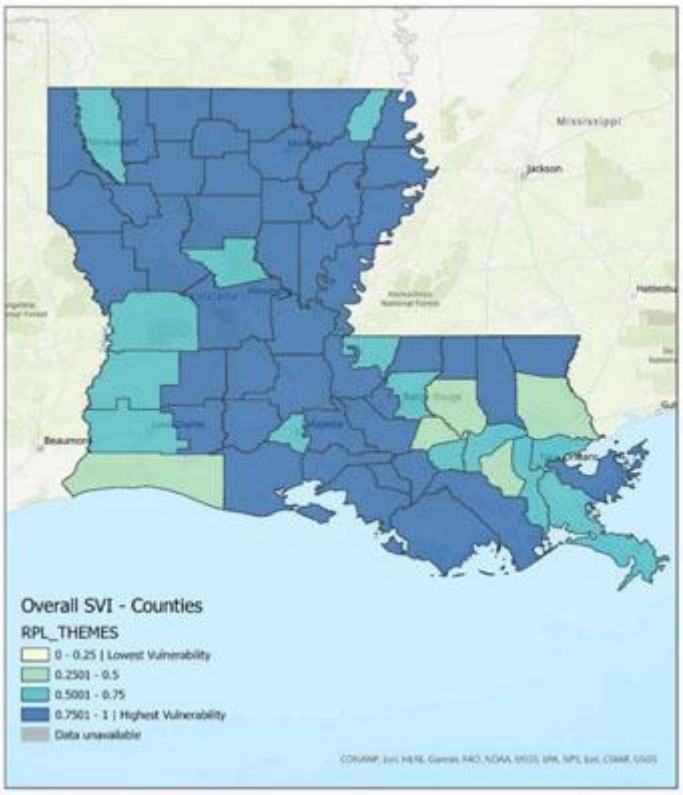
SOCIAL VULNERABILITY INDEX

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%

RACE	% OF HOUSEHOLDS
White	13.69%
Total	**100%**

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

In its administration of direct beneficiary programs, the state conducts broad outreach and advertisement measures to reach eligible applicants, including purchased and free media advertisements, along with partnering with local officials and interest groups. Initial data collection of unmet needs is conducted through a survey which can be completed by telephone or online submission (including by smartphone).

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.

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

STATEWIDE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

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

Data Source(s): 2019 ACS 5 year

EDUCATION DEMOGRAPHICS

EDUCATION	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Population 25 and over	3,125,153.00	100%	1,110,755.00	36%	905,505.00	29%

EDUCATION	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Less than high school graduate	461,706.00	15%	168,293.00	36%	132,257.00	29%
High School graduate or equivalency	1,061,388.00	34%	406,661.00	38%	320,594.00	30%
Some college, associate degree	848,474.00	27%	298,038.00	35%	248,486.00	29%
Bachelor's degree or higher	753,585.00	24%	237,763.00	32%	204,168.00	27%
Total						

Data Source(s): 2019 ACS 5 year

i. Income Demographics

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

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

LMI ANALYSIS - STATEWIDE

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

Data Source(s): 5-Year ACS

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LMI ANALYSIS-FEDERALLY DECLARED DISASTER AREAS

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

COUNTY	NON-MID-TOTAL LMI PERSONS	NON-MID-TOTAL POPULATION	NON-MID-PERCENTAGE LMI	MID-TOTAL LMI PERSONS	MID-TOTAL POPULATION	MID-PERCENTAGE LMI
Total	**364.00**	**537.00**	**624%**	**9,040.00**	**13,623.00**	**960%**

Data Source(s): FEMA IA Data

MOBILE HOUSING UNITS IMPACTED BY DISASTER

COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Acadia	329.00	3%
Allen	330.00	3%
Beauregard	912.00	9%
Caddo	33.00	0%
Calcasieu	5,332.00	50%
Cameron	420.00	4%
Grant	155.00	1%
Iberia	170.00	2%
Jackson	19.00	0%
Jefferson Davis	361.00	3%
La Salle	18.00	0%
Lafayette	298.00	3%
Lincoln	44.00	0%
Morehouse	32.00	0%
Natchitoches	146.00	1%
Ouachita	143.00	1%
Rapides	425.00	4%
Sabine	94.00	1%
St. Landry	338.00	3%
St. Martin	223.00	2%

COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Union	93.00	1%
Vermilion	281.00	3%
Vernon	348.00	3%
Winn	62.00	1%
Total	**10,606.00**	**98%**

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

SNAP AND D-SNAP APPLICANTS IMPACTED BY THE DISASTER

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

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

LIMITED ENGLISH PROFICIENCY BREAKDOWN

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Acadia	1,499.00	1%
Allen	653.00	1%
Ascension	1,843.00	1%
Assumption	515.00	0%
Avoyelles	1,099.00	1%
Beauregard	393.00	0%
Bienville	63.00	0%
Bossier	2,746.00	2%
Caddo	3,262.00	3%
Calcasieu	3,455.00	3%

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COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Caldwell	115.00	0%
Cameron	97.00	0%
Catahoula	44.00	0%
Claiborne	34.00	0%
Concordia	79.00	0%
De Soto	310.00	0%
East Baton Rouge	12,168.00	10%
East Carroll	25.00	0%
East Feliciana	18.00	0%
Evangeline	1,471.00	1%
Franklin	56.00	0%
Grant	700.00	1%
Iberia	2,438.00	2%
Iberville	226.00	0%
Jackson	142.00	0%
Jefferson	33,538.00	27%
Jefferson Davis	460.00	0%
Lafayette	7,381.00	6%
Lafourche	3,832.00	3%
La Salle	254.00	0%
Lincoln	1,147.00	1%
Livingston	1,257.00	1%
Madison	67.00	0%
Morehouse	140.00	0%
Natchitoches	275.00	0%
Orleans	12,754.00	10%
Ouachita	941.00	1%

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Plaquemines	683.00	1%
Pointe Coupee	299.00	0%
Rapides	2,428.00	2%
Red River	52.00	0%
Richland	22.00	0%
Sabine	198.00	0%
St. Bernard	1,748.00	1%
St. Charles	1,029.00	1%
St. Helena	94.00	0%
St. James	175.00	0%
St. John the Baptist	945.00	1%
St. Landry	2,419.00	2%
St. Martin	2,245.00	2%
St. Mary	1,835.00	1%
St. Tammany	5,217.00	4%
Tangipahoa	1,725.00	1%
Tensas	29.00	0%
Terrebonne	2,870.00	2%
Union	254.00	0%
Vermilion	2,348.00	2%
Vernon	981.00	1%
Washington	1,011.00	1%
Webster	252.00	0%
West Baton Rouge	301.00	0%
West Carroll	84.00	0%
West Feliciana	64.00	0%
Winn	15.00	0%

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Total	**124,820.00**	**97%**

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

LANGUAGES SPOKEN WITHIN STATE

LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Chinese	5.00	0%	Allen
Chinese	296.00	0%	Caddo
Chinese	286.00	0%	Calcasieu
Chinese	742.00	0%	Lafayette
Chinese	11.00	0%	Natchitoches
Chinese	214.00	0%	Ouachita
Chinese	448.00	0%	Rapides
Chinese	83.00	0%	Vermilion
Chinese	99.00	0%	Vernon
French (incl. Patois, Cajun)	6,022.00	10%	Acadia
French (incl. Patois, Cajun)	936.00	4%	Allen
French (incl. Patois, Cajun)	202.00	1%	Beauregard
French (incl. Patois, Cajun)	1,406.00	1%	Caddo
French (incl. Patois, Cajun)	5,411.00	3%	Calcasieu
French (incl. Patois, Cajun)	390.00	6%	Cameron
French (incl. Patois, Cajun)	2,162.00	7%	Jefferson Davis
French (incl. Patois, Cajun)	15,081.00	7%	Lafayette
French (incl. Patois, Cajun)	147.00	0%	Natchitoches
French (incl. Patois, Cajun)	302.00	0%	Ouachita
French (incl. Patois, Cajun)	1,391.00	1%	Rapides
French (incl. Patois, Cajun)	5,875.00	8%	St. Landry

LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
French (incl. Patois, Cajun)	8,026.00	15%	Vermilion
French (incl. Patois, Cajun)	237.00	0%	Vernon
Spanish or Spanish Creole	844.00	1%	Acadia
Spanish or Spanish Creole	913.00	4%	Allen
Spanish or Spanish Creole	681.00	2%	Beauregard
Spanish or Spanish Creole	3,979.00	2%	Caddo
Spanish or Spanish Creole	4,143.00	2%	Calcasieu
Spanish or Spanish Creole	156.00	2%	Cameron
Spanish or Spanish Creole	377.00	1%	Jefferson Davis
Spanish or Spanish Creole	7,944.00	4%	Lafayette
Spanish or Spanish Creole	336.00	1%	Natchitoches
Spanish or Spanish Creole	1,909.00	1%	Ouachita
Spanish or Spanish Creole	2,931.00	2%	Rapides
Spanish or Spanish Creole	801.00	1%	St. Landry
Spanish or Spanish Creole	1,116.00	2%	Vermilion
Spanish or Spanish Creole	2,112.00	4%	Vernon
Speak only English	50,213.00	87%	Acadia
Speak only English	21,694.00	90%	Allen
Speak only English	32,431.00	96%	Beauregard
Speak only English	227,383.00	96%	Caddo
Speak only English	169,267.00	93%	Calcasieu
Speak only English	5,776.00	91%	Cameron
Speak only English	26,616.00	91%	Jefferson Davis
Speak only English	186,591.00	87%	Lafayette
Speak only English	35,968.00	98%	Natchitoches
Speak only English	141,088.00	97%	Ouachita
Speak only English	116,072.00	94%	Rapides

LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Speak only English	69,759.00	90%	St. Landry
Speak only English	44,338.00	81%	Vermilion
Speak only English	43,750.00	92%	Vernon
Vietnamese	45.00	0%	Allen
Vietnamese	25.00	0%	Beauregard
Vietnamese	701.00	0%	Caddo
Vietnamese	647.00	0%	Calcasieu
Vietnamese	32.00	0%	Jefferson Davis
Vietnamese	1,274.00	1%	Lafayette
Vietnamese	221.00	0%	Ouachita
Vietnamese	380.00	0%	Rapides
Vietnamese	112.00	0%	St. Landry
Vietnamese	1,053.00	1%	Vermilion
Vietnamese	82.00	0%	Vernon
All other Languages	16,443.00	1%	n/a
Total	**1,269,975.00**	**1,378%**	

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

AFFECTED CONTINUUM OF CARE ENTITIES

COC NUMBER	COC ENTITY	IMPACTED COUNTY	HOMELESS COUNT
LA-500	Lafayette/Acadiana CoC	Acadia, St. Landry, St. Martin & Vermilion	417.00
LA-502	Shreveport, Bossier/Northwest Louisiana CoC	Caddo, Bossier	298.00
LA-503	New Orleans/Jefferson Parish CoC	Jefferson and Orleans Parishes	1,314.00
LA-505	Monroe/Northeast Louisiana CoC	Jackson, Lincoln, Morehouse, Ouachita & Union Parishes	162.00

COC NUMBER	COC ENTITY	IMPACTED COUNTY	HOMELESS COUNT
LA-506	Slidell/Southeast Louisiana CoC	Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes	118.00
LA-507	Alexandria/Central Louisiana CoC	Grant, La Salle, Rapides, Vernon & Winn Parishes	107.00
LA-509	Louisiana Balance of State CoC	Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes	757.00
Total	**3,173.00**		

Data Source(s): HUD Exchange

POINT-IN-TIME COUNT - TYPE OF SHELTER

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

Data Source(s): HUD Exchange

POINT-IN-TIME COUNT - IMPACTED BY DISASTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
Statewide	861.00	193.00	350.00	1,404.00

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
FEMA Declared	31.00	33.00	111.00	175.00
MIDs	25.00	27.00	90.00	142.00
Total				

Data Source(s): HUD Exchange

HUD ASSISTED HOUSING IMPACTED BY THE DISASTER

COUNTY	TOTAL HOUSING CHOICE VOUCHERS	TOTAL IMPACTED HOUSING CHOICE VOUCHER UNITS	TOTAL LIHTC UNITS	TOTAL IMPACTED LIHTC UNITS	TOTAL PUBLIC HOUSING DWELLING UNITS	TOTAL IMPACTED PUBLIC HOUSING DWELLING UNITS
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

COUNTY	TOTAL HOUSING CHOICE VOUCHERS	TOTAL IMPACTED HOUSING CHOICE VOUCHER UNITS	TOTAL LIHTC UNITS	TOTAL IMPACTED LIHTC UNITS	TOTAL PUBLIC HOUSING DWELLING UNITS	TOTAL IMPACTED PUBLIC HOUSING DWELLING UNITS
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
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
Total	**18,105.00**	**1,028.00**	**21,848.00**	**1,184.00**	**9,103.00**	**1,293.00**

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.

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 preparedness and mitigation measures will be integrated into rebuilding activities for both non-federal match programs. These measures are built within the FEMA structure and the state shall monitor these efforts. This match aligns with the unmet needs associated with other planned state, local and regional projects.

FEMA Public Assistance Program

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

Data Source(s): GOHSEP

Total Cost and Need by PA Category

PA CATEGORY	ESTIMATED PA COST	10% LOCAL MATCH	15% RESILIENCY	TOTAL NEED (MATCH + RESILIENCY)
A - Debris	$632,406,010.00	$63,240,601.00	$94,860,902.00	$158,101,503.00
B - Emergency Measures	$690,852,394.00	$69,085,239.00	$103,627,859.00	$172,713,098.00
C - Roads and Bridges	$15,593,272.00	$1,559,327.00	$2,338,991.00	$3,898,318.00
D - Water Control Facilities	$38,963,799.00	$3,896,380.00	$5,844,570.00	$9,740,950.00
E - Building and Equipment	$826,809,449.00	$82,680,945.00	$124,021,417.00	$206,702,362.00
F - Utilities	$344,451,354.00	$34,445,135.00	$51,667,703.00	$86,112,838.00
G - Other	$36,045,266.00	$3,604,527.00	$5,406,790.00	$9,011,316.00
Total	**$2,585,121,544.00**	**$258,512,154.00**	**$387,768,232.00**	**$646,280,385.00**

Data Source(s): GOHSEP

Approximate Recovery Cost per Agency

AGENCY	APPROXIMATE COST
City or Township Government	$319,851,083.00
County Government	$588,274,383.00
Independent School District	$280,368,416,.00
Indian/Native American Tribal Government (Federally Recognized)	$56,637.00
Indian/Native American Tribally Designated Organization	$84,916.00
Nonprofit with 501C3 IRS Status	$456,793,951.00
Nonprofit without 501C3 IRS Status	$103,162,651.00
Public/Indian Housing Authority	$23,281,528.00
Public/State Controlled Institution of Higher Education	$1,036,373.00
Special District Government	$190,266,194.00

AGENCY	APPROXIMATE COST
State Government	$391,819,939.00
Total	**$2,354,996,071.00**

Data Source(s): GOHSEP

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

PROJECT	COST	FUNDING SOURCE	UNMET NEED (10% LOCAL MATCH)
Statewide	$140,931,096.00	FEMA	$35,232,774.00
Total	**$140,931,096.00**		**$35,232,774.00**

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. 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.

AGRICULTURAL LOSSES

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

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

Table below gives the different types of agricultural losses.

AGRICULTURAL LOSSES

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

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

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

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

SUMMARY OF ECONOMIC UNMET NEEDS

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

Total Business Loans Approved by the SBA

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

COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Sabine	n/a	$285,000.00
St. Landry	n/a	$349,800.00
St. Martin	n/a	$120,200.00
Union	n/a	$43,100.00
Vermilion	n/a	$194,700.00
Vernon	n/a	$1,525,100.00
Winn	n/a	$98,300.00
Total	**$273,695,750.00**	

Data Source(s): SBA

LOUISIANA Office of COMMUNITY DEVELOPMENT

SBA Applicant Breakdown

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

Data Source(s): SBA

iv. Estimating Business Operations Losses

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

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
Total							

Data Source(s): Not available

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

E. 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.

3. GENERAL REQUIREMENTS

A. CITIZEN PARTICIPATION

Outreach and Engagement

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

STATE AGENCIES

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

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

activation, the LTRS is convened alongside the UCG to access recovery needs following a disaster, activate Recovery Support Functions (RSF) for complex recovery issues and develop post-disaster recovery strategies.

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

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

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

- Governor's Office of Homeland Security and Emergency Preparedness
- Louisiana Office of Community Development
- Louisiana Department of Agriculture and Forestry, or his designee.
- Louisiana Department of Wildlife and Fisheries, or his designee.
- Lieutenant Governor Office
- Louisiana Department of Children and Family Services
- Louisiana Department of Health

- Louisiana Department of Education
- Department of Transportation and Development
- Louisiana Housing Corporation
- Louisiana Economic Development
- Coastal Protection and Restoration Authority

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

- RSF 1 – Planning and Capacity conducted an assessment of local governmental jurisdiction using data available in the public domain and hurricane impact data to determine the level of ability for local jurisdictions to plan and execute a comprehensive recovery effort, given the existing implications of COVID-19 on local budgets and the economy. This assessment has been vetted and coordinated through focus group meetings in cooperation with state agencies, the Louisiana Municipal Association; the Louisiana Police Jury Association; the State Chapters of the American Planning Association and the American Institute of Architects; the Louisiana Association of Planning Districts; and the eight Watershed Regions and other organizations. Additionally, RSF 1 is participating in the regular monthly meetings of the organizations for mutual updates and further collaboration. This assessment is identifying short- and long-term needs – i.e. staffing and expertise gaps, training and technical assistance needed broadband and other technology issues, and funding gaps and resources which may be needed to sustain their operations.
    - The state and FEMA conducted a new training curriculum - a Just-In-Time (JIT) Training – an ongoing series designed for and targeting local elected officials and their key recovery staff, to assist them in focusing, in real-time, on current issues of response and recovery at various intervals following the disasters. Modules were refined to address specific issues emanating from the disasters based on the type of staff participants and the impacted jurisdictions represented.
    - The state's "Long Term Resilience Planning Guide", drafted after the 2016 Floods and implemented as a pilot resulting in two "best practices" to planning – the Ouachita Strong and the Denham Strong Plans -is being revised and updated to reflect the flood risk standards subsequently developed by the Watershed Initiative; guidance on planning regionally as opposed to an independent jurisdictional approach; the inclusion of the current mitigation approaches and the use of effective facilitation skills and the use of Zoom and other virtual and social media platforms to ensure inclusiveness in soliciting public input and a partnership with local residents.
- RSF 2 – Economic Development, under the leadership of the Louisiana Economic Development Department activated an emergency contract to assess damages to businesses and the local economy,

covering physical damages to business, business interruption, loss of revenues to individual businesses, the agriculture economy, and state parks. This report is being circulated so that local and federal partners can develop appropriate programs and identify financial and technical resources to assist those businesses.

- RSF 3 – Health & Human Services, led by the Louisiana Department of Health, the Department of Children and Family Services, the Governor's Office of Homeland Security and Emergency Preparedness, in partnership with local VOAD organizations and advocacy groups, developed a matrix of needs, including housing issues, which identified immediate health and emotional issues associated with the trauma of a storm and residential displacement, as well as long term, residual and psychological impacts, particularly in a COVID-19 environment. In addition, the impact of COVID-19 is complicating an already overburdened health care system.
- RSF 4 – Housing – Activated immediately due to the level of residences impacted, the Governor designated the Louisiana Housing Task Force, which was created in 2012 and activated after Hurricane Isaac and the Great Floods of 2016, to function as RSF 4-Housing. This body has been meeting weekly. Under the leadership of the HUD Field Office in New Orleans, HUD is conducting a HUD Housing Assessment through virtual Zoom interviews which will provide more insights into the housing situation on the ground and is inclusive of HUD owned properties, residential homeowners and rental properties and publicly owned properties, both land and facilities, which can be used to develop and expand the availability of affordable housing in the impacted area. Focus groups and targeted outreach in the field included the U.S. Department of the Treasury, the FDIC, local elected officials, local non-profits, local developers and citizens.
- RSF 5 – Infrastructure & RSF 6 – Natural and Cultural Resources – Both RSFs are working with their regional outreach teams in the field and local jurisdictions, in coordination with the FEMA PA team, to identify structural damage to roads, marshes, wetland, state parks, and historical sites.

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

INDIAN TRIBES

There are four federally recognized tribes in Louisiana - Chitimacha Tribe of Louisiana, 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 *(tentatively scheduled)*

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.

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
Pre-Meeting #1	**March 9, 2022**	**In-Person**	**Rapides Parish (Alexandria, LA)**
Pre-Meeting #2	**March 9, 2022**	**In-Person**	**Calcasieu Parish (Lake Charles, LA)**
Pre-Meeting #3	**March 14, 2022**	**Virtual**	**All**
Pre-Meeting #4	**March 16, 2022**	**In-Person**	**Caddo Parish (Shreveport, LA)**

PUBLIC HEARING #	DATE	METHOD	MID LOCATION
Pre-Meeting #5	**March 16, 2022**	**In-Person**	**Ouachita Parish (Monroe, LA)**
Public Hearing #1	**April 7, 2022**	**In-Person**	**Calcasieu Parish (Lake Charles, LA)**
Public Hearing #2	**April 12, 2022**	**Virtual**	**All**

**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.

- 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.
- 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.

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.

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

Flood Insurance Requirements

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

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

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

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

Construction Standards

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

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

- Energy STAR (Certified Homes or Multifamily High Risk) Enterprise Green Communities

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

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

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

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

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

Contractors Standards

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

Recovery programs implemented by the State of Louisiana will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to carry required licenses, insurance coverage(s) for all work performed, and state-contracted contractors will be required to provide a warranty period for all work performed. Contractor standards will be enumerated for each program (e.g., homeowners and rental property owners) in respective policies and

procedures documents, and will pertain to the scale and type of work being performed, including the controls for assuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through a Louisiana Office of Community Development-Disaster Recovery Unit administered program described in this Action Plan may be appealed by homeowners or small business owners (as applicable) whose property was repaired by contractors under the state's control.

Appeals must comply with the policies and procedures of the specific program under which the homeowner or business owner's property was rehabilitated. Additional appeals information is contained in the "Complaints" section of this Action Plan.

The State of Louisiana intends to promote high quality, durable and energy efficient construction methods in affected parishes. All newly constructed buildings must meet all locally adopted building codes, standards and ordinances as evidenced by final certificate of occupancy. In the absence of locally adopted and enforced building codes that are more restrictive than the state building code, the requirements of the State Building Code will apply. Future property damage will be minimized by incorporating resilience standards through requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

Preparedness, Mitigation and Resiliency

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

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

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

The LWI has identified eight watershed districts, each with a funded fiscal agent, which have created regional steering committees, representative of the demographics, parishes, and local jurisdictions within each watershed

to ensure inclusivity at all levels of decision making. These steering committees have analyzed their local flood risks, identified shared priorities and long-term governance needs, and will establish long-term management protocols and prioritize regional risk reduction project investments.

ADDITIONAL CONSIDERATIONS

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

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

Mitigation Needs Assessment

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

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

There have been 90 major disaster declarations in the state of Louisiana since 1954. The most common natural disasters that cause damages to an extent that results in a federal disaster declaration are hurricanes and flooding. Since 2000, there have been 22 declared flood and hurricane-related 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
Lafayette	$140 million	$390 million
Lake Charles	$420 million	$490 million

National Flood Insurance Program

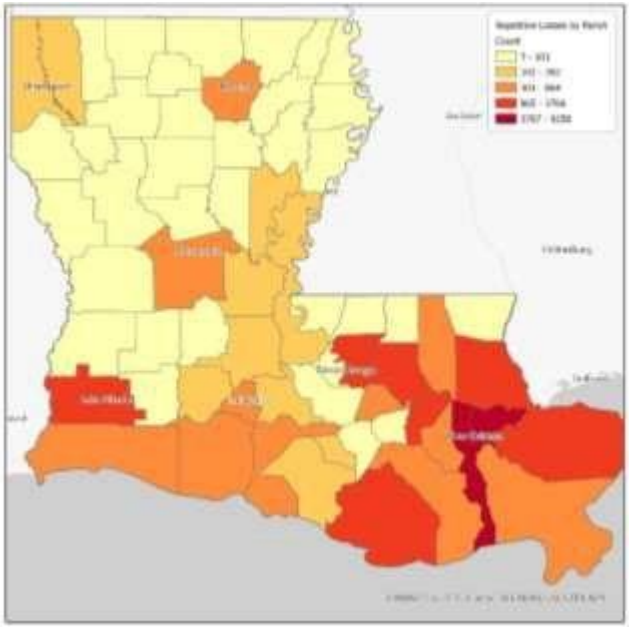
Flooding is a problem for many people across the United States. Enduring the consequences of repetitive flooding can put a strain on residents and on state and local resources. When the water rises, communities face the disruption of life, damaged belongings, and the high cost of rebuilding. FEMA administers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

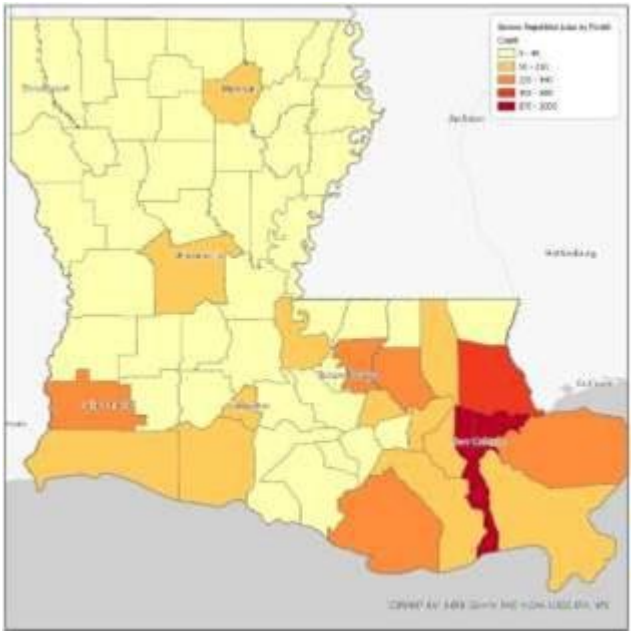
Repetitive and Severe Repetitive Flood Loss

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

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

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





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

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

Cost of Future Risks

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

Despite the state's extensive efforts to mitigate flood risks following hurricanes Katrina, Rita, Gustav, Ike, Isaac, and the Great Floods of 2016, as well as through long-term efforts like the Coastal Master Plan, losses attributable to a 1 percent AEP flood event will account for more than one-third of all anticipated disaster losses in 2043[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
Tornado	$31,725,662	$281,804	$32,007,466
Wildfire	$5,876,211		$5,876,211
Lightning	$2,917,407	$3,483	$2,920,890
Hail	$1,976,212	$110,057	$2,086,269
Dam Failure	$1,011,414		$1,011,414
Extreme Heat	$-	$744,345	$744,345
Sinkhole	$342,071		$342,071

6 Ibid.

Greatest Risk Hazards

The Louisiana GOHSEP Hazard Identification and Risk Assessment (2018 HIRA) ranks local floods as the highest risk to the state based on consideration of consequence, vulnerability, threat, and risk factors. This threat is followed closely by severe thunderstorms, wide-area floods, tornados, and hurricanes. Based on the SHMP and local hazard mitigation plans, both HUD and LA MID areas share a collective greatest risk profile that includes wind and flood

hazards, which are compounded by the effects of subsidence and sea-level rise. This section addresses quantitative and qualitative descriptions of these hazards and their projected current and future risk to MID areas and the State of Louisiana.

Hurricanes/Tropical Cyclones

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

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

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

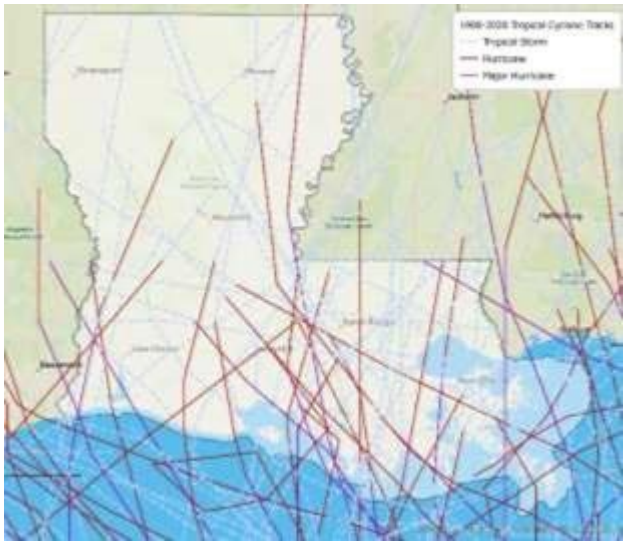


Figure: Tropical Cyclone Tracks Across Louisiana (1900-2020)

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

Floods

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

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

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

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

Figure: 100-Year Flood Inundation Area in Louisiana

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

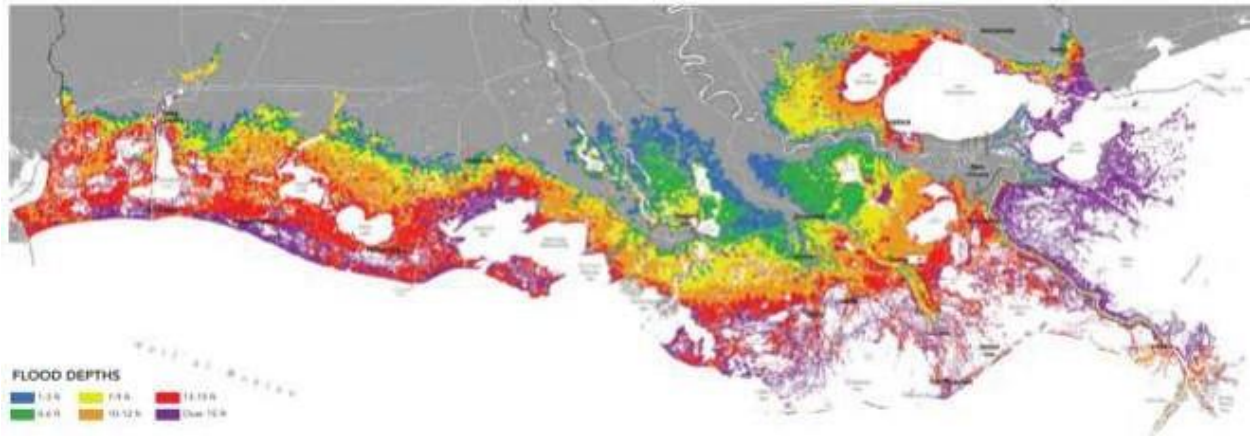


Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action

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

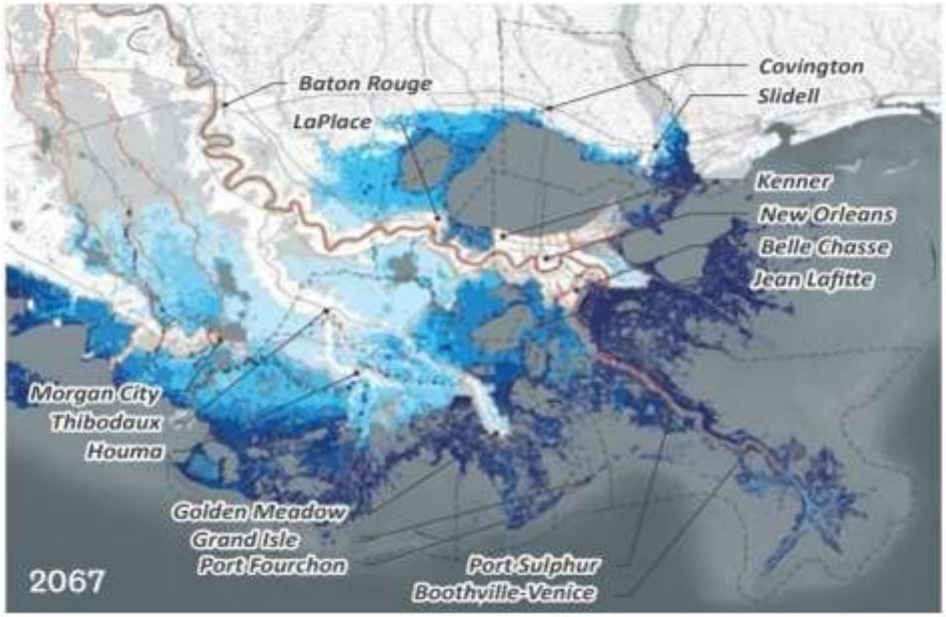


Figure: 2067 Coastal Flood Risk Projections (No Action)
Source: https://s3.amazonaws.com/lasafe/Final+Adaptation+Strategies/Regional+Adaptation+Strategy.pdf

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.

1 FEMA. Disaster Declaration for States and Counties.

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

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

4 NOAA. Billion-Dollar Weather and Climate Disasters: Events

5 LSU, Economics & Policy Research Group. Regional Impacts of Coastal Land Loss and Louisiana's Opportunity for Growth

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

8 GOHSEP, 2018. Hazard Identification and Risk Assessment.

9 GOHSEP. State of Louisiana Hazard Mitigation Guide. 2019

10 Linda Benedict and John M. 'Jay' Grimes, III. "Precipitation Patterns Over the Bayou State." 11/30/2011.

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

12 United States Global Change Research Program. Climate Science Special Report: Fourth National Climate Assessment, Volume I. Washington, DC: U.S. Global Change Research Program (2017). "Chapter 7: Precipitation Change in the United States

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.

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.

[1] Stafford Act, Title III, Sec. 312, (a)

[2] Subrogation agreements in programs run by subrecipients would require repayment to the subrecipient

4. GRANTEE PROPOSED USE OF FUNDS

OVERVIEW

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

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

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

The largest portion of funding has been allocated to assist impacted homeowners and renters through programs that address disaster impacts and affordable housing, as these were the largest needs identified in the unmet needs assessment. 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, $300 million 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 needs, the State of Louisiana proposes the following programs that will focus on assisting homeowners to reconstruct, rehabilitate, and elevate homes to build more resilient communities in areas affected by Hurricanes Laura and Delta:

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

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

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

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

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

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

Buyouts and acquisitions will be prioritized to include sites that were substantially damaged from the hurricanes and are subject to repetitive or severe flooding, significant future flood risk, as shown in the Coastal Protection and Restoration Authority's (CPRA) Coastal Master Plan, or sites that are in proximity to a flood source, within the

potential land acquisition area of a flood control project, or subject to a disposition or conservation plan by a state or local entity, including a nonprofit or environmental preservation organization. The program would also target benefits to vulnerable communities or those communities experiencing extensive damage and subject to the potential large-scale relocation of homeowners via buyout and safe housing incentive.

The following are ineligible activities:

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

ECONOMIC REVITALIZATION

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

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

- Provide assistance to small businesses that provide income-producing jobs to residents of the disaster-impacted communities.
- Provide assistance to small businesses that provide services, goods and amenities to residents of the disaster-impacted communities.

- Ensure the financial assistance invested in these programs is sound and secure through the provision of technical assistance to eligible businesses.

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

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

INFRASTRUCTURE

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

PLANNING

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

LOUISIANA Office of COMMUNITY DEVELOPMENT

Program Budget

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

The state will submit the proposed action plan with the initial funding allocation of $600 million for Hurricanes Laura and Delta in May 2022, and will provide an amendment for the total, revised allocated amount of over $1 billion for Hurricanes Laura and Delta once the Federal Register Notice is released.

Total Allocation: $1.05 Billion

Light Gray Text: First Allocation of $600M

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

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	$272,298,226.00 **$250,000,000.00**	$217,838,580.80 **$200,000,000.00**	$54,459649.20 **$50,000,000.00**	45% **24%**	-	Low- and moderate-income or Urgent Need	0
	Buyout	$20,000,000.00 **$10,000,000.00**	$16,000,000.00 **$8,000,000.00**	$4,000,000.00 **$2,000,000.00**	3% **1%**	-	Low- and moderate-income or Urgent Need	0
	New Construction	$90,000,000.00 **$456,078,744.00**	$72,000,000.00 **$364,862,995.20**	$18,000,000.00 **$91,215,749.80**	15% **43%**	-	Low- and moderate-income or Urgent Need	0
	Other	$3,500,000.00 **$6,500,000.00**	$2,800,000.00 **$5,200,000.00**	$700,000.00 **$1,300,000.00**	1% **1%**	-	Low- and moderate-income or Urgent Need	0
ECONOMIC REVITALIZATION	Workforce Training	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
	Business Grants	$5,100,000.00 **$100,455,482.00**	$4,080,000.00 **$80,364,385.60**	$1,020,000.00 **$20,091,096.40**	1% **10%**	-	Low- and moderate-income or Urgent Need	0
	Other	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
INFRASTRUCTURE	Water/sewer Improvements	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
	Health Facilities	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
	Other	$185,232,774.00 **$185,232,774.00**	$148,186,219.20 **$148,186,219.20**	$37,046,554.80 **$37,046,554.80**	31% **18%**	-	Low- and moderate-income or Urgent Need	0
PUBLIC SERVICES	Legal Services	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
	Housing Counseling	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
	Other	$0.00 **$0.00**	$0.00 **$0.00**	$0.00 **$0.00**	0% **0%**	-	0	0
ADMIN	Admin	$23,900,000.00 **$41,900,000.00**	$19,120,000.00 **$33,520,000.00**	$4,780,000.00 **$8,380,000.00**	4% **4%**	-	Low- and moderate-income or Urgent Need	0
PLANNING	Planning	$100,000.00 **$100,000.00**	$80,000.00 **$80,000.00**	$20,000.00 **$20,000.00**	0% **0%**	-	Low- and moderate-income or Urgent Need	0
TOTAL	**$600,131,000.00**	$480,104,800.00 **$1,050,267,000.00**	$120,026,200.00 **$840,213,600.00**	$28,900,000.00 **$210,053,400.00**				

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

Connection to Unmet Needs

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

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

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

Leveraging Funds

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

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

OTHER SOURCES OF FUNDS

Housing

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

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

Economic Development

The state will combine funding to address economic development unmet needs from other federal funding sources such as SBA loans, NFIP, non-disaster CDBG funding, USDA, and the U.S. Department of Commerce. Non-

federal resources such as local and state economic development public funds, as well as private financing and equity investments, will provide additional leverage to disaster recovery funds.

Infrastructure

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

Mitigation

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

Distribution of Funds

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

CONNECTION TO UNMET NEEDS

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

The Disaster Relief Supplemental Appropriations Act requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver); (2) meet a national objective as defined by 24 Code of Federal Regulations (CFR) 570.483; and (3) addresses a direct or indirect disaster impact in presidentially declared impacted parishes. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the

Housing and Community Development Act (HDCA) of 1974, as amended. The recovery activities described herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low- and moderate-income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Louisiana.

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

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

Hurricanes Laura and Delta caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state's review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than $510 million. The need for safe, decent, and affordable housing is the state's top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described above. Approximately 50 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as to provide affordable rental housing for persons displaced by the storm. In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses and provide for non-federal match for both FEMA PA and HMGP. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure, and planning programs.

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

Due to the limited funds received in this allocation, the state has prioritized vulnerable populations throughout each of the programs proposed in this Action Plan. The owner-occupied housing programs will prioritize, low- and

moderate- income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. And, in the tenant-based programs, the state will prioritize the same populations plus, persons displaced by the disaster event in need of affordable housing. As the state conducts housing program intake, it will coordinate outreach efforts in accordance with locales with high levels of documented damages and vulnerability.

Program Income

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

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

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

PROGRAM INCOME DEPOSITED IN THE REVOLVING LOAN FUND

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

PROGRAM INCOME USED TO REDUCE THE NEXT PROGRAM DRAW

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

Pre-Agreement Cost

OCD has incurred and plans to incur additional pre-agreement costs and will seek reimbursement for these costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of OCD used for the planning of the CDBG-DR programs. Other pre-agreement

costs, which OCD will fund with this grant, could include activity delivery and projects costs associated with eligible disaster recovery programs identified within this Action Plan.

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

Resale or Recapture

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

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

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

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

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

B. PROGRAM DETAILS

Housing Programs

FLOOD INSURANCE PROGRAM

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

Narratives

Program Description

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

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

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

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

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

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

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

Additional eligibility requirements are as follows:

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not Applicable.

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

LOUISIANA Office of COMMUNITY DEVELOPMENT

INTERIM HOUSING ASSISTANCE

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

Narratives

Program Description

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

National Objective: Benefits to low to moderate income persons.

Program Eligibility

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

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

Eligible Applicants, Criteria for Selection and Method of Distribution:

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

LOUISIANA Office of COMMUNITY DEVELOPMENT

MIDDLE-MARKET LOAN PROGRAM (MMLP)

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

Narratives

Program Description

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

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Minimum 20 years

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

Eligible activity:

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

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

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

Program Responsible Entity

Administering Entity - State of Louisiana

Program Maximum Assistance

$6 Million

Program 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.

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

NEIGHBORHOOD LANDLORD RENTAL PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

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

Program Definition of Second Home/Eligibility

None

Program National Objective(s)

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

Program Eligibility

Eligible activity:

- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)
- New Housing Construction Waiver, as identified in Federal Register No. 6303-N-01

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

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

Program Responsible Entity

Administering Entity – The state of Louisiana and/or its subrecipient(s)

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

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

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

- Awards will be made to qualified applicants based on the score during the competitive round of funding and thereafter upon submission of eligible, completed applications.
- Specific scoring criteria will be outlined in the program guidelines.
- Applicants must own the unit and have clear title to the property for which they are applying at the time of application.
- Each project will be reviewed for ownership, title issues, duplication of benefits, financial feasibility, and cost reasonableness.

- Applications must be for only one property; however, developers may submit multiple applications.
- Properties must be located outside of a Special Flood Hazard Area (SFHA).
- Preference will be given to for-profit applicants that were property owners at the time of the hurricanes. Applicants who acquired property after Hurricanes Laura and Delta are also eligible to apply but the applicant must have acquired the property by the time of application. Prior to the application period, the state will conduct outreach and education events for potential applicants. Potential applicants are not required to participate in these events to apply to the program, but it is strongly recommended.

Program 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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

PERMANENT SUPPORTIVE HOUSING PROGRAM (PSHP)

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

Narratives

Program Description

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

PSHP achieves these outcomes in two ways:

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

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

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

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

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program 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.

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

RAPID REHOUSING PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

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

Eligible Applicants:

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

LOUISIANA Office of COMMUNITY DEVELOPMENT

RESILIENT MIXED INCOME GAP FUNDING PROGRAM (PRIME)

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

Narratives

Program Description

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

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

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Minimum 20 years

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

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

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Each project will be reviewed on a competitive basis in an initial funding round. Additional rounds will be held if all funds are not allocated in the initial funding round. Scoring criteria may include weighted levels of use of mixed income, affordable units, energy efficiency, resilient design, financial efficiency, depth of affordability, and other desirable factors as defined in the Qualified Allocation Plan (QAP) or Notice of Funding Availability. The state may issue residual funds on a limited noncompetitive basis following a NOFA if it determines that residual funds do not justify an additional round, as provided by the program policies.

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

LOUISIANA Office of COMMUNITY DEVELOPMENT

RESTORE LOUISIANA HOMEOWNER PROGRAM

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

Narratives

Program Description

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

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

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

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

The following are ineligible activities:

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

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

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

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.

Program Eligibility

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

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

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

- Owner-occupant at time of disaster event
- Damaged property address was the applicant's primary residence at the time of disaster event

- Located in one of FEMA IA declared parishes for Hurricanes Laura and Delta
- Sustained damage as a result of any of the declared disasters
- Eligible structure as determined by program, including but not limited to, single family residences, duplexes, mobile homes, and resilient manufactured (modular) housing units.

Program Responsible Entity

Administering Entity – State of Louisiana

Program Maximum Assistance

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

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

1. ***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.
2. ***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.

3. ***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.
4. ***Voluntary Buyouts (Solution 4):*** The state will offer and conduct large-area voluntary buyouts as an allowable mitigation activity (on the block or neighborhood scale) for residents who own property located in repetitive loss areas, areas within FEMA designated floodways, and/or areas subject to moderate or high flood risk. Such buyout programs will include provisions for community-oriented assistance to homeowners in order to facilitate a successful transition to a location of lower flood risk outside of SFHAs.

Program Estimated Begin and End Dates

The State of Louisiana anticipates the launch the Homeowner Program in 2022 after the approval of the action plan by HUD. The program will end when all funds are expended, or six years after the execution of the grant agreement with HUD.

LOUISIANA Office of COMMUNITY DEVELOPMENT

SOFT SECOND MORTGAGE PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

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

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

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

Infrastructure Programs

HMGP GLOBAL MATCH PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

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

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

How Will Program Advance Long-Term Resilience

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

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

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

Program National Objective(s)

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

Program Eligibility

Non-federal share 105(a)(9)

Program Responsible Entity

State of Louisiana or its subrecipient(s).

Program Maximum Assistance

The maximum award will be the lesser of the cost-share requirement or a pro-rata share based on available funding.

Program Competitive Application Overview (if applicable)

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

Program Method of Distribution Description/Overview (if applicable)

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

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

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.

LOUISIANA Office of COMMUNITY DEVELOPMENT

NONFEDERAL SHARE MATCH PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

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

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

How Will Program Advance Long-Term Resilience

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

Program National Objective(s)

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

Program Eligibility

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

Program Responsible Entity

State of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award will be the lesser of the cost-share requirement or a pro-rata share based on available funding.

Program Competitive Application Overview (if applicable)

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

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

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

LOUISIANA Office of COMMUNITY DEVELOPMENT

Economic Revitalization Programs

SMALL BUSINESS LOAN AND GRANT PROGRAM

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

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

Program National Objective(s)

7. Low Mod Job Creation or Retention Activities
8. Low Mod Area Benefit
9. Low Mod Limited Clientele or Urgent Need

Program Eligibility

Program Eligible Activities:

Section 105(a)8, 105(a) 14-15, 105(a) 17 and 105(a)21-22

Eligible Applicants:

For-profit businesses and private non-profit organizations located in HUD MID areas.

Program Responsible Entity

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

Program Maximum Assistance

The program will provide standard awards of a maximum of $50,000, with exceptions allowing for up to a maximum award of $150,000.

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

Program Competitive Application Overview (if applicable)

Funds will be awarded through a competitive Notice of Funding Availability (NOFA) process.

Subrecipients will identify within their respective service areas underserved communities as indicated in the Notice for the purpose of affirmative marketing measures and technical assistance in the application process

Program Method of Distribution Description/Overview (if applicable)

Individual loans will be up to 40 percent forgivable, 60 percent fully repayable. Loan rates will be zero- to low-interest, amortized and repaid over a term outlined in the program policies and procedures. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures.

Program Estimated Begin and End Dates

The state is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

Other Program Details

The state understands that residential communities cannot fully recover and thrive without businesses returning to the community, as they provide essential services and employment to local residents. It is imperative that the state invest in those businesses that support recovering neighborhoods, provide local employment opportunities and produce the foods consumed directly or indirectly by local residents. The state has prioritized businesses that experienced physical or financial losses as a result of the disaster and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

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

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

Criteria for Selection:

The first allocation will prioritize assistance to businesses that:

- Were operating prior to the disaster
- Employ 1 to 50 full time equivalent employees
- Generate a minimum of $25,000 annual gross revenue
- Were directly impacted by the disaster, as a documented physical or financial loss
- Are located in the most impacted parishes (at least 80 percent of allocation will be dedicated to these parishes and to the remaining funds will be allocated to other impacted parishes)
- Provide essential goods or services necessary for the immediate and long-term housing and community recovery, which will be detailed in the program policies and procedures. Such goods and services may include grocery stores, pharmacies, healthcare providers, gas stations, residential construction-related companies, child care providers and locally-owned restaurants or residential service providers.
- Are located in or provide services to vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity as illustrated by the Social Vulnerability Index (SoVI).

5. APPENDIX

A. CERTIFICATIONS

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.
e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.
f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
h. The grantee certifies that it is complying with each of the following criteria:
    i. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017

pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

ii. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

iii. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.

iv. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

i. The grantee certifies that it will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:

   i. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

   ii. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD,

and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.

l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a special flood hazard area (or 100-year floodplain) in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
o. The grantee certifies that it will comply with applicable laws.

B. WAIVERS

(Waiver requests apply to all current and future allocations for 2020 and 2021 disasters)

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 areas and the structure should be removed to prevent future damage.

In OCD's model of MIT-funded buyout, the buyout amount can be coupled with a Safe Housing Incentive Grant, through which an eligible low- to moderate income households is provided the financial means to relocate to a safer area. Residential buyout projects for the purpose of flood mitigation, by design, remove units from the local real estate/rental market when those units are subject to substantial risk of flooding in the future.

The geographic areas upon which the CDBG-MIT buyouts focus are those that are unsafe for housing due to the susceptibility of flooding. It would be inappropriate to construct new affordable units in neighborhoods subject to substantial flood risk, as that would be a new investment in property likely to flood and placing future residents at risk. When residential buyout projects are used as a mitigation strategy to address future flood risk, they are intended to occur prior to anticipated future damage to the units. Thus, not all of the homes eligible for the buyout are currently storm damaged. However, simply based on their eligibility for a mitigation based buyout program, they should be subject to the waiver of the one-for-one replacement requirement as they prevent damage to, rather than enable recovery from, the damage of such units.

The one-for-one replacement requirement, when applied to the buyout of flood-prone property, would result in investment of the rough equivalent of the fair market value of the home subject for buyout and the additional applicable safe housing incentive in order to facilitate relocation of the residents to a safer location, **and** an additional investment of funds to construct a new affordable unit mitigated to avoid the flood risk in the subject area. This compound cost would discourage the use of buyouts as a mitigation strategy and would make buyout projects cost prohibitive.

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

within the same neighborhood as the units replaced would conflict with a comprehensive strategy to avoid the continued residential development of areas at high risk of flooding.

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 which 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.

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 individual 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.

C. SUMMARY AND RESPONSE OF PUBLIC COMMENTS

After the public comment period ends, the state will prepare responses to the comments. A summary of the comments and responses will be added to the Action Plan for submittal to HUD.

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

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OCD COMMON ACRONYMS

- **ABFE** Advisory Base Flood Elevation
- **AEP** Annual Exceedance Probability (of a flood)
- **AP** Action Plan
- **CDBG-MIT** Community Development Block Grant-Mitigation
- **CFR** Code of Federal Regulations
- **COVID-19** Coronavirus 2019 global pandemic
- **CPD** HUD Office of Community Planning and Development
- **CPRA** Coastal Protection and Restoration Authority DEQ Louisiana Department of Environmental Quality DOA Division of Administration
- **DOTD** Louisiana Department of Transportation and Development
- **DR** Disaster Recovery
- **FIRM** Flood Insurance Rate Maps
- **FRN** Federal Register Notice
- **GOHSEP** Governor's Office of Homeland Security and Emergency Preparedness
- **HUD** U.S. Department of Housing and Urban Development
- **LED** Louisiana Economic Development
- **LDAF** Louisiana Department of Agriculture and Forestry LDWF Louisiana Department of Wildlife and Fisheries LSU Louisiana State University
- **LTRS** Long-Term Recovery Subcommittee NDRF National Disaster Recovery Framework NFIP National Flood Insurance Program NOFA Notice of Funding Availability
- **OCD** Louisiana Office of Community Development
- **QPR** Quarterly Performance Reports RSF Recovery Support Function SHMP State Hazard Mitigation Plan USDA U.S. Department of Agriculture

F. STANDARD FORM 424

6. ATTACHMENTS

I. OCD DISASTER OUTREACH MEETINGS, 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 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	Set up demonstration of FEMA Mitigation Tool to use in SWLA planning/recovery

		Impacted Laura Communities	
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*** *****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 LMA, LSU, Watershed, CPRA, Public Service Commissioners	Set up briefing on "Increasing the Resilience of Electrical Systems in LA To Offset Hurricanes And Other Hazards" conducted by Cybersecurity and Infrastructure Security Agency
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
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 (10) cross-cutting recovery priorities for the 50-year long term recovery plan.
February 16, 2022	Louisiana Office of Community Development*** ***Two others being scheduled with Vermilion Parish Economic Development Council (economic development focus) and Kisatchie Delta Planning District (watershed).	City of Lafayette, Acadiana Planning Commission, OCD, Watershed Initiative, GOSHEP, EPA, FEMA	To discuss technical assistance to be provided Lafayette as a result of Letter of Interest submitted for assessing best placement for watershed projects

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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 information about the Emergency Rental Assistance Program	Statewide virtual briefing to provide status of federal 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
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.

II. UNMET HOUSING NEEDS

To calculate unmet housing needs, the state broadly analyzed populations in four distinct categories: 1) wind-damaged homeowners reported not to carry a hazard insurance policy; 2) wind-damaged homeowners reported to carry a hazard insurance policy; 3) flood-damaged homeowners reported not to carry an NFIP policy; 4) flood-damaged homeowners reported to carry an NFIP policy. For the purposes of this analysis, the state assumes populations carrying an insurance policy appropriate to their type of documented storm damages will have 80 percent of their damages covered by their insurance policies. Therefore, needs for these populations have been discounted to 20 percent of those for uninsured populations. Unmet needs for renter households are calculated by proportion from the final homeowner unmet needs.

Moreover, this analysis contemplates known sources of assistance. For example, 'FVL-HA' calculates the difference between a recorded FEMA Verified Loss and Housing Assistance disbursed through the FEMA IA program. Then, once a damage multiplier is applied to that remainder based on differences in FEMA and SBA inspections, approved SBA loan totals are subtracted from the needs total prior to calculating an unmet need total for each of the four respective populations. Lastly, only Major-Severe damage categories are used in the calculation of Unmet Needs. The following sets of tables include calculations of Unmet Housing Needs for the following models:

LAURA

WIND-DAMAGED HOMEOWNERS (UNINSURED)						
Categories	Count	FVL-HA	Multiplier	Losses	SBA Loan	Unmet Need
Severe	263	$7,226,397.37	3.1	$22,445,863.86	$(2,898,300.00)	$19,547,563.86
Major-High	401	$2,580,801.18	7.9	$20,429,311.91	$(3,289,600.00)	$17,139,711.91
Major-Low	3,254	$10,359,376.19	8.8	$90,805,778.17	$(23,358,000.00)	$67,447,778.17
Minor-High	3,716	$5,896,554.89	11.7	$69,134,099.64	$(15,363,600.00)	$53,770,499.64
Minor-Low	3,537	$2,031,859.74	21.4	$43,507,243.38	$(9,446,600.00)	$34,060,643.38
Total	11,171	$28,094,989.37		$246,322,296.96	$(54,356,100.00)	$191,966,196.96
Major-Severe Only	3,918	$20,166,575	20	$133,680,954	$(29,545,900)	$104,135,054

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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

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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

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

III. IMPACT ON HOMELESS POPULATIONS

The impact of natural disasters on the housed population and on people experiencing sheltered homelessness is very different from the impact on people experiencing unsheltered homelessness.

When a natural disaster damages a housing unit, its inhabitant can hypothetically be made whole by insurance or FEMA.

When a natural disaster damages a shelter or broader infrastructure, beds can be rendered uninhabitable, but eventually, those beds can be regained via repair and recovery operations.

For people experiencing unsheltered homelessness (e.g. living on the streets), however, the impact is more difficult to see. A natural disaster cannot remove housing or shelter from a person without housing or shelter;

instead, it destroys future housing opportunities. One of the primary barriers to permanent housing in any geography is a lack of affordable housing. When a natural disaster damages or destroys more than half of an area's affordable housing, as Hurricanes Laura and Delta did in Lake Charles and Hurricane Ida in Houma, it creates a housing cost and availability crisis that prevents people experiencing homelessness from achieving and stabilizing permanent housing.

2020 and 2021 Storms

The 2020 and 2021 hurricanes that devastated Louisiana will leave a legacy on homelessness in the state. For the estimated 50% of people experiencing homelessness who could return to housing without a public subsidy, there will no longer be housing available.

The Point-in-time (PIT) Count is an annual census of sheltered and unsheltered homeless persons on a single night conducted by Continuums of Care (CoC) across the United States https://www.hudexchange.info/programs/hdx/pit-hic/. Louisiana has seven Continuums of Care, which are regional planning bodies that coordinate housing and services for people experiencing homelessness https://laboscoc.org/housing-and-services. Hurricanes Laura, Delta, and Zeta of 2020 primarily impacted parishes in the Louisiana Balance of State Continuum of Care (LA 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.

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

CONTINUUMS OF CARE CONTAINING FEMA IA DECLARED PARISHES	2017	2018	2019	2020
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.