DISASTER RECOVERY INITIATIVE
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Allocations, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2011 or 2012
The Disaster Relief Appropriations Act, 2013 (Public Law 113-2)
Federal Register Docket No. FR-5696-N-03

LOUISIANA OFFICE OF COMMUNITY DEVELOPMENT/DISASTER RECOVERY UNIT

STATE OF LOUISIANA MASTER ACTION PLAN VERSION 3 FOR THE UTILIZATION OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS IN RESPONSE TO HURRICANE ISAAC

July 14, 2015

Bobby Jindal
Governor

Jay Dardenne
Lieutenant Governor

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Table of Contents

Executive Summary ..... **i**

Map of FEMA Individual Assistance-Declared Areas and Most Impacted Parishes ..... **iii**

I. Impact and Unmet Needs Assessment **1**

A. Background 1

B. Housing 1

1. Statewide Housing Assessment 1

a. Owner and Renter Occupied Damages 1

b. Impact on Public Housing Authorities 5

2. St. John the Baptist Parish 6

a. Pre-Isaac Conditions and Trends 6

b. Damage Assessment 7

3. Plaquemines Parish 11

a. Pre-Isaac Conditions and Trends 11

b. Damage Assessment 12

4. Housing Unmet Needs 15

C. Economic Development 17

1. Statewide Damage Assessment 17

2. St. John the Baptist Parish 19

3. Plaquemines Parish 19

4. Economic Development Unmet Needs 20

D. Infrastructure 21

1. Statewide Damage Assessment 21

2. St. John the Baptist Parish 23

3. Plaquemines Parish 24

4. Infrastructure Unmet Needs 24

E. Summary of Unmet Needs and Additional Considerations 25

1. Categories of Unmet Needs 25

2. Use of Urgent Need 26

3. Additional Considerations, Including Mitigation Measures 26

II. Strategies to Address Unmet Needs **27**

A. Connection Between Needs Assessment and Allocation of Funds 27

B. Allocation of Funds 28
1. Allocations to Most Impacted Parishes 30
a. St. John the Baptist Parish 31
i. Homeowner Rehabilitation Program 33
ii. Small Rental Rehabilitation Program 34
iii. Housing Elevation Program 34
iv. Demolition and Clearance Program 35
v. Homebuyer Assistance Program 35
b. Plaquemines Parish 37
i. Plaquemines Homeowner Assistance Program 38
2. Allocations to State-Run Programs 40
a. Statewide Cost-Share for FEMA Category B and TSA 40
b. Hazard Mitigation Assistance Cost-Share for LMI Households 42
c. Parish Recovery Priority Projects 43
d. Homeowner Rehabilitation Program 44
C. Method of Distribution 46
1. General Description 46
2. Method of Distribution Process 46
a. Distribution to Parishes 46
b. State-Run Programs 47
3. Deadlines and Process to Ensure Timely Expenditure of Funds 47
D. Leveraging Funds 47
1. Overview 47
2. Housing 47
3. Economic Development 48
4. Infrastructure 48
5. Other Sources of Funds 48
III. Planning and Coordination 49
IV. Citizen Participation 52
A. Citizen Participation Plan 52
1. Citizen Input 52
2. Louisiana Disaster Housing Task Force 52
B. Citizen Complaints 53
C. Receipt of Comments 53

D. Amendments to the Disaster Recovery Action Plan 53
1. Substantial Amendments 53
2. Submittal of Amendments 53
V. Other Criteria 54
A. Protection of People and Property; Construction Methods 54
B. Public Housing, HUD-Assisted Housing and Housing for the Homeless 54
C. Disaster-Resistant Housing 54
D. Minimize or Address Displacement 55
E. Program Income 55
F. Monitoring Standards and Procedures 56
G. Procedures to Detect and Prevent Fraud, Abuse and Mismanagement 56
H. Capacity 56
I. Certification of Controls, Processes and Procedures 57
J. Other 57

Executive Summary

Hurricane Isaac struck Louisiana's coast at Plaquemines Parish, southwest of the Mississippi River, on August 28, 2012, as a Category 1 hurricane. The storm headed back out over the Gulf of Mexico, making a second landfall just west of Port Fourchon, located in Lafourche Parish about 60 miles southwest of New Orleans, on August 29, 2012 (DR 4080-LA). The slow-moving storm proceeded to impact multiple Louisiana parishes with sustained strong winds and heavy rain through August 30, 2012.

The severe storms brought on by Hurricane Isaac caused damage to housing, infrastructure and businesses across the southern region of the state, as well as massive power outages to more than 900,000 homes and businesses. The storms also caused severe flooding due to storm surge in coastal parishes, as well as heavy rainfall and backflow along inland waterways. Isaac's highest storm surge levels were reported to be between eight and 10 feet in Southeast Louisiana.

Specifically, Hurricane Isaac caused significant flooding in most of **St. John the Baptist Parish** and the vast majority of **Plaquemines Parish** below the Town of Belle Chasse. These two parishes were designated eligible for Individual Assistance (IA) by the Federal Emergency Management Agency (FEMA) based on aerial reconnaissance identifying vast areas of flooding. An estimated 7,000 homes in St. John the Baptist Parish – which is bisected by the Mississippi River – flooded during and after Hurricane Isaac. Plaquemines Parish experienced overtopped levees and flooding as the storm moved over the area's marshland, fishing communities, oil refineries and shipping lanes.

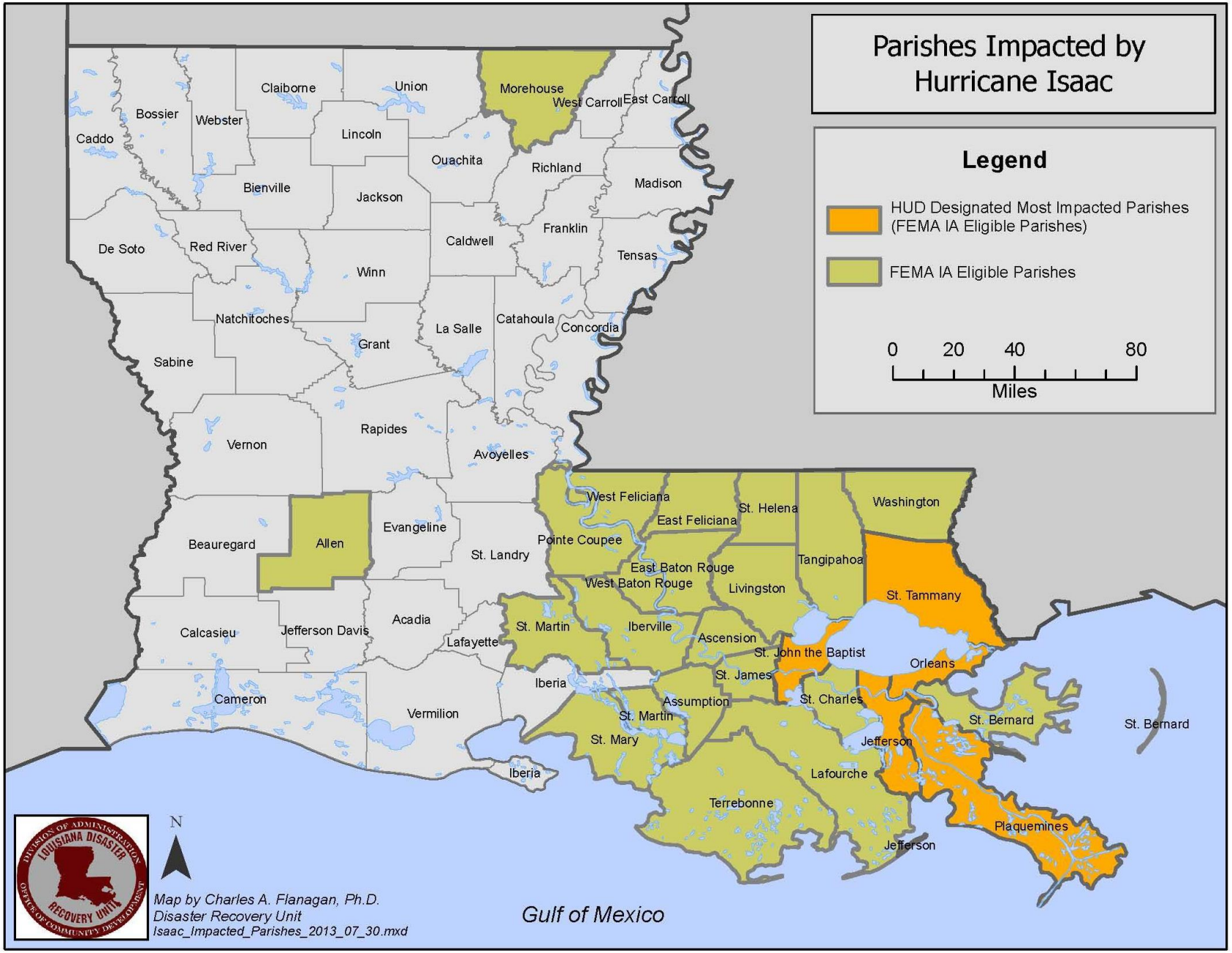
Additionally, storm surge from Lake Pontchartrain caused significant flooding in the southern portions of **St. Tammany, Tangipahoa** and **Livingston** parishes, particularly in the City of Slidell in St. Tammany, as well as the Lake Catherine area of **Orleans Parish**. Isaac's winds and rain battered **Jefferson Parish** and Orleans Parish for several hours, dumping 20 inches of rain on these heavily populated areas. Other parishes indicated localized flooding due to either the duration of rainfall or the high water in Lake Maurepas.

In total, Hurricane Isaac caused more than 2,700 individuals to relocate to emergency shelter sites. These sites were operated by the American Red Cross (ARC), the state, parishes and faith-based organizations. Federal medical sites were established to serve individuals with medical needs. As an indicator of the extent of damage done in St. John the Baptist Parish, the final emergency shelter in the parish closed on September 23, more than three weeks after Isaac's landfall.

The Disaster Relief Appropriations Act, 2013 (Pub. L. 113-2, approved January 29, 2013) (Appropriations Act) made available $16 billion in Disaster Recovery Community Development Block Grant (CDBG-DR) funds 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 resulting from a major disaster…due to …eligible events in calendar years 2011, 2012 and 2013." On May 29, 2013, the U.S. Department of Housing and Urban Development (HUD) published Federal Register Vol. 78, No. 103, which allocated $106,778,000 to the State of Louisiana for disaster recovery. Of these funds, the City of New Orleans, Jefferson Parish and St. Tammany Parish each received direct allocations from HUD, totaling $40,380,000.

The State of Louisiana is the recipient of the remaining $64,379,084. Governor Bobby Jindal has designated the state Office of Community Development/Disaster Recovery Unit (OCD/DRU) as the administering agency for these recovery funds.

On behalf of the State of Louisiana, OCD/DRU has developed the following Action Plan to outline the proposed use of funds and eligible activities available to assist declared parishes to meet unmet housing, economic development, public service, infrastructure and other needs that arose as a result of Hurricane Isaac. Because HUD provided direct allocations to the entitlement areas of Orleans, Jefferson and St. Tammany parishes, the following Action Plan applies to the impacted parishes of St. John the Baptist and Plaquemines, as well as those impacted parishes not directly included in HUD's allocation model.


Parishes Impacted by Hurricane Isaac
Legend
HUD Designated Most Impacted Parishes (FEMA IA Eligible Parishes)
FEMA IA Eligible Parishes
0 20 40 80
Miles
Caddo
Bossier
Webster
Claiborne
Union
Morehouse
West Carroll
East Carroll
Lincoln
Ouachita
Richland
Madison
Bienville
Jackson
Franklin
Tensas
De Soto
Red River
Caldwell
Winn
Natchitoches
La Salle
Catahoula
Concordia
Grant
Sabine
Rapides
Vernon
Avoyelles
Beauregard
Allen
Evangeline
St. Landry
Pointe Coupee
West Feliciana
East Feliciana
St. Helena
Washington
Tangipahoa
St. Tammany
East Baton Rouge
West Baton Rouge
Livingston
Calcasieu
Jefferson Davis
Acadia
Lafayette
St. Martin
Iberville
Ascension
St. John the Baptist
Orleans
St. James
Iberia
Cameron
Vermilion
Assumption
St. Charles
St. Martin
St. Mary
St. Bernard
St. Bernard
Jefferson
Lafourche
Terrebonne
Plaquemines
Jefferson
Gulf of Mexico
N
Map by Charles A. Flanagan, Ph.D.
Disaster Recovery Unit
Isaac_Impacted_Parishes_2013_07_30.mxd

I. Impact and Unmet Needs Assessment

A. Background

In accordance with HUD guidance, the State of Louisiana completed the following unmet needs assessment to identify priorities for CDBG-DR funding provided as a result of Hurricane Isaac. The assessment below utilizes federal and state resources including data provided by FEMA, HUD and the Small Business Administration (SBA) to estimate unmet needs in the three categories of damage: housing, economic development and infrastructure. HUD has identified the five most impacted parishes as St. John the Baptist, Plaquemines, Orleans, Jefferson and St. Tammany. However, other parishes were also significantly impacted. In addition, HUD has already provided separate grants to Orleans, Jefferson and St. Tammany parishes as individual entitlement areas. Therefore, the unmet needs assessments below focuses on statewide impacts, with specific sections detailing unmet needs in the non-entitlement areas of St. John the Baptist and Plaquemines parishes.

B. Housing

1. Statewide Housing Assessment

a. Owner and Renter Occupied Damages

Statewide, 29 parishes reported damages to owner-occupied households, and 26 parishes reported damages to renter households. Outside of St. John the Baptist and Plaquemines parishes, which are discussed in greater detail below, the most instances of reported damage were found in those entitlement communities receiving their own CDBG-DR allocations – Jefferson (11,762 instances of damage), Orleans (8,498) and St. Tammany (3,917). However, the state is concerned about unmet needs in other, more rural parishes. As of July 2013, the FEMA IA program had distributed in excess of $136.3 million in grants to homeowners for repairs and rebuilding in the state, with 314 households receiving the maximum amount of grant funds available.

In accordance with the guidance set forth in Federal Register Vol. 78, No. 103, the state has analyzed the FEMA IA applicant population and defined affected households based on the following tiers of damage:

Table 1: HUD-Defined Levels of Damage

Type	Definition
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*
Major-High	*$15,000 to $28,800 of FEMA-inspected real property damage and/or 4'-6' flooding on the first floor*
Severe	*Greater than $28,800 of FEMA-inspected real property damage or determined destroyed and/or 6' or more flooding on the first floor*

Based on this analysis, 55,537 owner-occupied households who applied for IA assistance suffered Real Property FEMA Verified Loss (RP FVL) attributed to Isaac. While the majority of the instances of damage were categorized "Minor-Low," it is important to note more than 57 percent of total statewide RP FVL is concentrated amongst approximately 9 percent of the affected households – those categorized under "Major-High" or "Severe" damage levels.

Table 2: Levels of Damage for Owner-Occupied Households In Declared Parishes

	All Owner Occupied			LMI* Owner Occupied			%	%
Type	# Damaged	Ave. RP FVL	Total RP FVL	# Damaged	Ave. RP FVL	Total RP FVL	Households LMI	Dollars LMI
Minor-Low	45,411	$759	$34,474,128	33,308	$755	$25,256,652	73%	73%
Minor-High	4,296	$4,637	$19,919,419	2,962	$4,610	$13,737,515	69%	69%
Major-Low	1,754	$11,540	$20,240,386	1,027	$11,455	$11,889,781	59%	59%
Major-High	3,042	$18,812	$56,925,010	1,368	$18,509	$25,264,330	45%	44%
Severe	1,034	$42,160	$43,129,830	503	$40,037	$19,858,554	49%	46%
Total	**55,537**	**$3,147**	**$174,688,774**	**39,168**	**$2,440**	**$96,006,831**	**71%**	**55%**

Source: FEMA IA, April 2013
***LMI calculation based on respective statistical area of damaged address**

Notably, approximately 70 percent of the affected owner-occupied population is classified low- and moderate-income (LMI). Concurrently, the LMI population suffered nearly 55 percent of recorded RP FVL statewide. Mindful of this distribution, the state is committed to meeting the needs of its storm-affected LMI population and will devote more than half of its CDBG-DR allocation to the benefit of LMI residents and communities, per the regulations outlined in Federal Register Vol. 78, No. 43.

Table 3: Damage Breakdown of Owner-Occupied Households by Location

Location	# Damaged	Ave. RP FVL	Total RP FVL
Allen	39	$1,453.11	$56,671.30
Ascension	1,073	$1,670.67	$1,792,625.71
Assumption	621	$1,253.09	$778,171.60
East Baton Rouge	1,218	$888.08	$1,081,682.07
East Feliciana	224	$852.90	$191,049.55
Iberia	5	$1,006.58	$5,032.90
Iberville	573	$1,252.34	$717,588.56
Jefferson	11,762	$1,458.24	$17,148,892.52
Jefferson Davis	2	$935.64	$1,871.28
Lafayette	1	$130.50	$130.50
Lafourche	2,002	$1,628.84	$3,260,944.03
Livingston	2,390	$3,734.01	$8,909,351.92
Morehouse	44	$748.17	$32,919.64
Orleans	8,498	$1,140.68	$9,692,359.20
Plaquemines	2,785	$10,950.98	$30,443,719.00
Pointe Coupee	130	$633.20	$82,315.42
St. Bernard	2,204	$1,245.26	$2,742,068.87
St. Charles	1,445	$1,490.52	$2,153,807.94
St. Helena	640	$868.93	$556,116.37
St. James	962	$1,493.88	$1,437,116.51
St. John the Baptist	5,861	$10,565.02	$61,911,012.96
St. Martin	203	$984.18	$199,788.68
St. Mary	1,238	$1,281.50	$1,586,493.21

St. Tammany	3,917	$3,840.27	$15,007,783.63
Tangipahoa	4,198	$2,187.95	$9,180,654.42
Terrebonne	1,886	$1,586.18	$2,991,534.54
Washington	1,323	$1,811.20	$2,394,411.93
West Baton Rouge	200	$1,006.24	$201,248.14
West Feliciana	93	$1,413.02	$131,411.15
Total	**55,537**	**$3,146.98**	**$174,688,773.55**

Source: FEMA IA, April 2013

Assessing impacts on renters is a bit more challenging than for homeowners, as renters are less likely to apply to FEMA for housing assistance, and their personal loss will tend to be in contents rather than structure. However, there is data available through both IA inspections and the SBA that indicates a strong need in this area. While rental populations are more mobile than owner-occupied populations by nature and are therefore better-equipped to navigate the aftermath of a post-catastrophic event, the state is aware of Isaac's impact to renter households and, where appropriate, will devote CDBG-DR resources to the restoration of affected rental communities.

Tables 4 and 5 illustrate the levels of rental damage occurring statewide, as broken down by FEMA's categorization system:

Table 4: FEMA Levels of Rental Damages

Level	Definition
Moderate	Moderate structure damage includes less than six (6) inches of water on first occupied floor of the dwelling. Other event types such as fire may have visible soot and ash that impacts habitability requiring professional cleaning. Access to the dwelling can be considered Minor due to conditions such as minor washouts requiring some road fill that prevents routine access to the dwelling; this can be classified as moderate.
Substantial	Substantial structure damage should be noted with water levels greater than six (6) inches and less than four (4) feet. Items such as a collapsed chimney, furnace damage, water heater damage, exterior siding damages and/or roof damages affecting one or both sides of the dwelling, compromised windows and/or doors. Access to the dwelling can be considered substantial when access may be blocked with down trees or the private road is substantially washed out.
Major	Major structure damage is identified when approximately four (4) feet of water or more on first occupied floor. Other items can substantiate major structure damage such as collapsed foundation walls, piers and/or significant separation in the walls from the dwelling. Wind events that have removed/damaged the majority of the roof and/or wall components. Access to the dwelling can be considered major when the only access is by a bridge that has collapsed.

Source: FEMA IA

Per that categorization system, the state analyzed the affected statewide rental population both as a full population and as an LMI subset. Among the FEMA IA applicants identified as renters, 86 percent were classified as LMI. Of the 1,070 rental households with "Major" or "Destroyed" damage levels, 83 percent were classified as LMI.

Table 5: Levels of Damage for Renter Households

Type	# Damaged (All)	# Damaged (LMI only)	% LMI
Moderate	10,938	9,526	87%
Substantial	3,358	2,811	84%
Major	1,004	827	82%
Destroyed	66	59	89%
Total	**15,366**	**13,223**	**86%**

Source: FEMA IA, April 2013

In addition to FEMA IA data, the state analyzed SBA home loans approved for rental households. Per this analysis, Jefferson and Orleans had the greatest number of households approved; however, this is likely a misleading statistic, as these two parishes have large stocks of rental housing and are seemingly more likely to be able to absorb a displaced population. In fact, FEMA Rental Assistance (RA) data suggests rental populations displaced in surrounding parishes, like St. John the Baptist, were more likely to relocate to Jefferson or Orleans parishes than remain in their home parish. Furthermore, while Jefferson and Orleans had more instances of approved SBA Home Loans, St. John the Baptist, Plaquemines and St. Tammany parishes all had higher individual averages and comparable total disbursements when compared to the two more-populated parishes. As such, the state is concerned about those parishes with instances of rental damage that may not have a robust rental market able to adapt to post-Isaac conditions. St. John the Baptist and Plaquemines aside, rural parishes like Tangipahoa and Livingston are of particular concern, and the state may devote CDBG-DR resources to rental capacity building efforts in those and other parishes with demonstrated need.

Table 6: SBA Home Loans for Renters

Parish	# Approved	Average Loan	Total Amount
Ascension	1	$1,300	$1,300
East Baton Rouge	3	$6,433	$19,300
Iberville	1	$3,200	$3,200
Jefferson	94	$7,281	$684,400
Livingston	2	$6,250	$12,500
Orleans	47	$6,264	$294,400
Plaquemines	38	$16,371	$622,100
St. Bernard	7	$4,043	$28,300
St. Charles	2	$3,400	$6,800
St. James	2	$7,950	$15,900
St. Mary	1	$1,200	$1,200
St. Tammany	44	$14,832	$652,600
St. John the Baptist	42	$19,260	$808,900
Tangipahoa	3	$7,400	$ 22,200
Terrebonne	2	$3,700	$ 7,400
Washington	3	$15,367	$46,100
West Baton Rouge	1	$4,400	$ 4,400
Total	**293**	**$11,027**	**$3,231,000**

Source: SBA, May 2013

Concurrently, lessors of residential units represented a high proportion of SBA disaster business loans approved following Isaac. Combined with the above SBA Home Loan data, these two indicators illustrate both demand-side impacts to the rental population as well as supply-side

impacts to rental property owners, which are described in greater detail in this assessment's discussion of economic damages and resulting unmet needs.

b. Impact on Public Housing Authorities

In order to understand the impact that Hurricane Isaac had on Public Housing Authorities (PHA), the Louisiana Housing Authority worked with the Louisiana Housing Council to survey PHAs in the impacted areas. As an additional measure, the Louisiana Housing Corporation (LHC) made direct calls to the potentially impacted PHAs in order to ensure that the outreach efforts were as exhaustive as possible. The questions asked in both the survey and direct calls were aimed at assessing the total number of units damaged, the total cost of the damages and the amount of unmet recovery and rebuilding needs. As of July 11, 2013, 19 of the 26 PHAs identified had either responded to the survey or been reached directly. Four PHAs reported damages to their units and identified rebuilding or repair needs. The needs included minor and major roof repairs, tree removal and interior repairs (e.g. sheetrock and insulation removal and replacement).

- The Jefferson Parish Housing Authority reported that 169 of its 200 units sustained some level of damage. Preliminary reports estimate the damages to be upwards of $250,000, the majority of which will not be covered by either insurance or other sources of funds. The state will encourage Jefferson Parish to coordinate with the Jefferson Parish Housing Authority to determine if their CDBG-DR allocation is an appropriate source of funding for any outstanding needs.

- The St. John the Baptist Parish Housing Authority reported that 124 of its 296 units sustained damage. While the severity of the damage varied, some units were substantially damaged and will require complete reconstruction in order to return them to a habitable condition. In addition, the St. John PHA reported that two of its four administration buildings were damaged. The PHA expects to receive both insurance proceeds and FEMA assistance; however, in the event that unmet needs are identified, they may be addressed.

- The Donaldsonville Housing Authority (located in Ascension Parish) and the Lafourche Parish Housing Authority both reported damages to their units. However, the exact extent of the damages is not yet known. Both PHAs have also indicated that they are working with FEMA to obtain funding that will be used to address the Isaac-related issues. Once all damage assessments have been completed, if unmet needs are identified, they may be addressed.

The state will continue to assess impacts on PHAs, particularly the unmet repair and rebuilding needs not otherwise covered by insurance or FEMA. In addition, the state is committed to working with PHAs to develop and implement measures that will make their units more resilient in the wake of future storms. With an understanding that many of the individuals who reside in subsidized housing represent the most vulnerable residents of our state, it is of the utmost importance to ensure that impacted PHAs are given the tools and resources they need to rebuild effectively and sustainably.

On February 12, 2014, the state completed a second round of outreach to PHAs located in Isaac-impacted areas, to receive updates on information previously provided and to determine if any needs not previously identified have arisen. As was the case with the initial round of outreach, the most recent efforts included an email survey via the statewide network of PHAs. In addition, direct calls were made to PHAs that reported damages and/or unmet needs following the outreach completed in July 2013.

- The Jefferson Parish Housing Authority reported the same information as was provided during the initial round of outreach: 169 of its 200 units sustained some level of damage, with an estimated total repair cost of $250,000. As Jefferson Parish received a direct allocation, the state is working with parish leadership to ensure that the parish's PHA is considered in its decisions related to allocating its CDBG-DR funds.

- The St. John the Baptist Parish Housing Authority reported that it has received $484,000 in insurance proceeds and anticipates receiving $300,000 from FEMA, which it anticipates will cover the majority of the repair needs arising from Hurricane Isaac. In addition, the St. John PHA indicated that HUD has contracted with a consultant to assist the PHA in putting together a redevelopment plan and to determine the most effective use(s) for the insurance and FEMA funds.

- The Donaldsonville Housing Authority did reiterate the information provided during the initial outreach efforts but added that it has filed a claim with FEMA for funding to cover the needed repairs. The Lafourche Parish Housing Authority did not report any additional damages and did not express that they anticipate having any unmet needs after utilizing the funding received from FEMA.

The state did receive responses from the East Baton Rouge Housing Authority, the Houma-Terrebonne Housing Authority and the St. Charles Parish Housing Authority. All indicated that they sustained some damage to their units and are currently unsure as to whether the insurance and FEMA funds received to date and/or anticipated to be received will be sufficient to cover the costs of needed repairs. The state will continue to interact with these PHAs as they work through the claims process (with both insurance and FEMA) in order to determine if there will be unmet repair or rebuilding needs.

As of February 5, 2015, St. John the Baptist Parish is considering a request, pending eligibility, from the St. John the Baptist Housing Authority to designate a portion of the parish's CDBG-DR allocation directly to the St. John PHA.

2. St. John the Baptist Parish

a. Pre-Isaac Conditions and Trends

St. John the Baptist Parish is located on the western edge of suburban New Orleans and is part of the "River Parish Region", which spans the distance between New Orleans and Baton Rouge. Like other parishes bisected by the Mississippi River, its population centers are located along the riverbank, with areas along the northern and southern parish boundaries largely consisting of swamps or other natural areas. Edgard, a community of more than 2,400 (*see Attachment A: Demographic Breakdown of St. John the Baptist and Comparison of Surrounding Areas*) on the river's west bank, serves as the parish seat. Yet LaPlace, a sprawling suburban community on the east bank, is St. John the Baptist's largest population center, with more than 29,800 residents. Of the parish's four remaining Census Defined Places (CDPs), Reserve and Garyville – with an excess of 9,700 and 2,800 residents, respectively – are other population centers of note.

Homeownership rates are consistently high throughout the parish, with all six CDPs between a high of 84 percent (Pleasure Bend) and a low of 77 percent (Edgard, Reserve). However, the proportion of homeowners with a mortgage varies in different areas of the parish, from a low of 39 percent in Edgard to a high of 77 percent in LaPlace. Parish-wide, 68 percent of homeowners have a mortgage. While homeownership rates are consistently high, median household incomes vary, with higher median incomes in the CDPs on the river's east bank and lower incomes along the river's west bank. This income disparity is likely exacerbated by limited

transportation corridors linking the east and west banks, devaluing property in west bank municipalities like Edgard.

According to 2010 U.S. Census data, statistically, St. John the Baptist has much in common with bordering parishes, as well as the New Orleans-Metairie-Kenner Metropolitan Statistical Area (MSA). While its population of 45,924 dwarfs bordering Ascension, Lafourche, Livingston and Tangipahoa parishes, St. John the Baptist is most comparable to St. Charles Parish in both geographic area and demography. The most notable difference between St. John the Baptist and St. Charles parishes is in median household income, with St. John's $47,666 more comparable to the New Orleans-Metairie-Kenner MSA ($47,647) than bordering parishes Ascension ($63,716), St. Charles ($60,961) or St. James ($51,725).

In October 2012, HUD conducted a pre-damage assessment of the areas most affected by Hurricane Isaac, including St. John the Baptist Parish. Per its assessment, HUD determined the parish had sustained a 2 percent annual decline in population since the 2010 Census, estimating 44,600 residents and 15,600 households as of August 2012. Furthermore, HUD characterized housing market conditions as "soft," estimating single-family home vacancy at 1.5 percent. HUD reported a 9 percent decline in home sales in the 12-month period prior to Isaac in comparison to the year prior. In the same period, new housing starts declined 21 percent, while the proportion of distressed mortgages increased from 11 to 12 percent.

Concurrently, HUD reported rental vacancy rates had declined from 12 percent to 10 percent between April 2010 and August 2012, representing a real increase in rental demand, as no new permits for multifamily units were issued in a 24-month period ending July 2012.

Combined, 2010 Census data and HUD's pre-damage assessment suggest evolving demographic conditions in St. John the Baptist Parish, irrespective of Hurricane Isaac's impact. Specifically, a low single-family home vacancy rate, combined with declining existing home sales, new housing starts and overall population suggests an owner-occupied housing market at or near equilibrium, especially considering St. John the Baptist is one of the few parishes in southeastern Louisiana experiencing population outflow. This outflow is primarily due to a return to pre-Katrina population levels after receiving a post-Katrina population increase. However, the current population estimates for 2012 are slightly lower than pre-Katrina levels. Given this status, there remains a decline in the rental vacancy rate with no additional rental stock, which further reinforces a shift in the parish's overall housing market.

b. Damage Assessment

Table 7: St. John the Baptist Parish Demographics and Damage Summary

Location	Census Owner Occ.	Owners w/ Damage	% Owner Damage	Census Renter Occupied	Renters w/ Damage	% Renters Damage	Damage Concentration
Edgard	673	297	44%	199	23	12%	37%
Garyville	783	230	29%	222	55	25%	28%
Laplace	8,249	4,386	53%	2,083	1,499	72%	57%
Pleasure Bend	94	30	32%	18	2	11%	29%
Reserve	2,606	839	32%	763	292	38%	34%
Wallace	194	62	32%	40	6	15%	29%
Rest of Parish	38	17	45%	3	4	133%	51%
Total	**12,637**	**5,861**	**46%**	**3,328**	**1,881**	**57%**	**48%**

Source: FEMA IA, April 2013

Damage was extensive and widespread along both the Mississippi River's east and west banks in St. John the Baptist Parish. In total, more than 48 percent of the parish's households reported some level of damage, including 46 percent of the parish's owner-occupied household population and 57 percent of the parish's renter household population. However, because it is by far the largest population center in the parish and it experienced extensive flooding, the majority of owner-occupied and renter household damage was centralized in LaPlace, with 4,386 owner-occupied households and 1,499 renter households reporting some level of verified damage. Additionally, LaPlace also had the highest concentration of reported damages, with 53 percent of the owner-occupied population and 72 percent of the renter household population with verified damages. Outside of LaPlace, the highest concentrations of damage were located in Edgard (37 percent of households reporting damage), Reserve (34 percent of households reporting damage) and in those areas outside of the parish's CDPs (51 percent of households reporting damage). It is important to note that damage was highly concentrated in LaPlace compared to the rest of the parish, with approximately 76 percent (5,885 of 7,742 instances) of all reported damage occurring in this population center. Furthermore, much of the owner-occupied damage was limited to single-family housing units within LaPlace, which accounted for 75 percent of all instances of this type of damage (4,386 of 5,861) in the parish. As of July 2013, the FEMA IA program had distributed in excess of $33 million in grants to homeowners for repairs and rebuilding in the parish. Concurrently, as of May 2013, SBA had approved 804 home loans worth more than $45 million.

Below are charts illustrating the predominance of single-family housing damage, as well as its specific prevalence in LaPlace.

Table 8: Damage Breakdown of Owner-Occupied Households by Type in St. John the Baptist Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL
Condo	24	$7,908.69	$189,808.50
House	5,077	$11,769.95	$59,744,246.80
Mobile Home	719	$2,453.99	$1,764,419.19
Other	2	$7,073.53	$14,147.05
Townhouse	16	$9,410.39	$150,566.17
Travel Trailer	23	$2,079.36	$47,825.25
Total	**5,861**	**$10,565.02**	**$61,911,012.96**

Source: FEMA IA, April 2013

Table 9: Damage Breakdown of Owner-Occupied Households by Location within St. John the Baptist Parish

Location	# Damaged	Ave. RP FVL	Total RP FVL
Edgard	297	$1,316.28	$390,934.73
Garyville	230	$1,811.29	$416,597.04
LaPlace	4,386	$13,377.67	$58,661,104.47
Pleasure Bend	30	$4,315.41	$129,462.30
Reserve	839	$2,491.38	$2,090,268.89
Wallace	62	$1,296.42	$80,377.79
Rest of Parish	17	$8,368.69	$142,267.74
Total	**5,861**	**$10,565.02**	**$61,911,012.96**

Source: FEMA IA, April 2013

Table 10: Damage Breakdown of Owner-Occupied Households by Income in St. John the Baptist Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
LMI	3,227	$7,899.82	$25,484,827.55	55.06%
Not LMI	2,634	$13,829.23	$36,426,185.41	44.94%
Total	**5,861**	**$10,565.02**	**$61,911,012.96**	**100.00%**

Source: FEMA IA, April 2013

As for the affected population, high concentrations of LMI owner-occupied households reported damage across the parish, with more than 55 percent of FEMA IA owner applicants defined as such. The vast majority of those reporting damage were single-family homes, which had an average RP FVL of $11,769.95. In total, approximately 97 percent of all reported damage was to single-family homes. Geographically, damage in LaPlace stands out in comparison to other areas of the parish using RP FVL as a metric, with nearly 95 percent of RP FVL located within the municipality. While it is important to note the state does believe there are unmet needs outside of LaPlace — in localized areas, substantial unmet needs — it should be noted that LaPlace had the most damage in owner- and renter-occupied housing units.

Overall, St. John the Baptist experienced comparatively low rates of damage to mobile homes and other dwelling types. However, concentrations of mobile home damages increase in CDPs outside of LaPlace. Across the parish, damaged mobile home units had an average RP FVL of $2,454.

Tables 11 and 12 illustrate the breakdown of damage by insurance type and income level. It is important to note substantial portions of the affected population were classified LMI, and of further concern, instances of LMI increase in categories not expected to have damages covered through traditional hazard insurance or through the National Flood Insurance Program (NFIP). The state is especially concerned about the population of 855 flooded LMI households with no flood coverage and the 706 LMI damaged households with no hazard coverage that suffered damage.

Table 11: Insurance Status of Damaged, Flooded Homeowners in St. John the Baptist Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
NFIP Covered - Not LMI	1,620	$19,157.38	$31,034,950.93	42.46%
NFIP Covered - LMI	902	$18,053.06	$16,283,863.68	23.64%
No NFIP - Not LMI	439	$10,816.61	$4,748,491.65	11.51%
No NFIP – LMI	855	$8,772.97	$7,492,115.27	22.39%
Total	**3,816**	**$15,611.91**	**$59,559,421.53**	**100.00%**

Source: FEMA IA, April 2013

Table 12: Insurance Status of Damaged, Not Flooded Homeowners in St. John the Baptist Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
Hazard Covered - Not LMI	484	$1,004.45	$486,156.19	23.67%
Hazard Covered - LMI	764	$906.71	$692,729.96	37.36%
No Hazard Ins - Not LMI	91	$1,720.73	$156,586.64	4.45%
No Hazard Ins - LMI	706	$1,439.26	$1,016,118.64	34.52%
Total	**2,045**	**$1,149.92**	**$2,351,591.43**	**100.00%**

Source: FEMA IA, April 2013

Also of great concern is the large population of households classified with "Major-High" and "Severe" levels of damage. In total, 2,220 owner-occupied households fit into one of these two classifications, with 843 of those households also categorized as LMI. Overall, LMI households accounted for 41 percent of the total damage reported within the owner-occupied population. Finally, while non-LMI populations did have a higher average reported amount of loss, it may not represent a higher proportional loss in relation to non-LMI household property values.

Table 13: Levels of Damage for Owner-Occupied Households in St. John the Baptist Parish

	All Owner Occupied			LMI Owner Occupied				
Type	# Damaged	Ave. RP FVL	Total RP FVL	# Damaged	Ave. RP FVL	Total RP FVL	% Households LMI	% Dollars LMI
Minor-Low	2,532	$842	$2,131,657	1,748	$826	$1,444,167	69%	68%
Minor-High	466	$4,942	$2,302,741	294	$4,922	$1,447,015	63%	63%
Major-Low	643	$12,329	$7,927,656	342	$12,336	$4,218,876	53%	53%
Major-High	1,911	$20,470	$39,097,047	745	$20,218	$15,041,919	39%	38%
Severe	309	$33,825	$10,451,911	98	$34,009	$3,332,851	32%	32%
Total	**5,861**	**$10,565**	**$61,911,013**	**3,227**	**$7,900**	**$25,484,828**	**55%**	**41%**

Source: FEMA IA, April 2013
Note: LMI calculation based on New Orleans-Metairie-Kenner MSA

St. John's rental population represents 21 percent of all households (3,328 of 15,965). Proportionally, 20 percent of damaged households in the parish were rental households. Like the single-family population, rental damage was concentrated in LaPlace, as 76 percent of damaged rental households were located in this CDP. Of this total in LaPlace, 85 percent of the damaged rental population was LMI. Parish-wide, 1,591 of 1,881 – or 85 percent – of damaged rental households were LMI.

Table 14: Levels of Damage for Renter Households in St. John the Baptist Parish

Type	# Damaged (All)	# Damaged (LMI only)	Percent LMI
Moderate	939	803	86%
Substantial	777	654	84%
Major	160	129	81%
Destroyed	5	5	100%
Total	**1,881**	**1,591**	85%

Source: FEMA IA, April 2013

While rental populations are by nature more mobile in response to adverse events, the state is especially concerned about the high proportion of affected renters that are also classified LMI. As more information is gathered from the state's long-term disaster case management effort, the state continues gathering additional data detailing what, if any, segment of this population was put at risk for homelessness as a result of the storm.

3. Plaquemines Parish

a. Pre-Isaac Conditions and Trends

Plaquemines Parish is located south of New Orleans and is bordered on the west by Jefferson Parish and on the east by St. Bernard Parish. The Mississippi River bisects the parish diagonally before creating a delta at its mouth, and this bisection divides the parish into distinct east and west banks. The parish is noted for its outdoors activities, especially fishing and hunting. As a result, many residents of surrounding areas maintain second homes – or "camps" – in Plaquemines, with the transient population creating a seasonally affected economy. Moreover, the parish (along with Lafourche and Terrebonne parishes) is a regional hub for the oil and gas industry, a major component of Plaquemines' economy.

Belle Chasse is the parish's largest population center, with more than half of the parish's total population residing there. This is an important factor to note in discussion of the parish, as Belle Chasse is located within the federal levee protection system developed. As such, while Plaquemines' total population declined from 26,757 to 23,042 between the 2000 and 2010 Census counts, Belle Chasse's population grew from 9,848 to 12,679 within the same period. In short, Plaquemines' population has retreated north, where it may be better-suited to withstand major weather events. Because of that shift, Belle Chasse's demographic profile undoubtedly skews parish-wide statistics. Belle Chasse's median household income of more than $66,700 significantly exceeds the median household income of the parish. To illustrate the contrast between Belle Chasse and the rest of the parish, Port Sulphur, Plaquemines' next most populated CDP, has a median household income of more than $27,400. (*See Attachment B: Demographic Breakdown of Plaquemines Parish and Comparison of Surrounding Areas.*) Furthermore, between the 2000 Census and 2010 Census, Plaquemines Parish experienced a substantial increase in median household income, from more than $38,100 in 2000 to more than $54,700 in 2010. This increase suggests a more affluent population remaining in the parish following Hurricane Katrina, but one which is located predominantly in Belle Chasse. From the state's perspective, this is a key factor to note, as much of Isaac's damage was located outside of Belle Chasse. As such, the affected population may have less recovery capacity than parish-wide data suggests.

In October 2012, HUD conducted a pre-damage assessment of the areas most affected by Hurricane Isaac, including Plaquemines Parish. Per the assessment, HUD concluded the homeowner market to be "balanced," with a 1.5 percent vacancy rate. Meanwhile, over the course of the previous year, HUD found overall home sales had declined 7.4 percent, but average selling prices had increased 11 percent over the same period. HUD concluded rental market conditions were "soft," with a 12 percent vacancy rate. Additionally, HUD noted only two multifamily units were permitted in the 12 months ending July 2012, a decline from 32 in the previous year.

b. Damage Assessment

Table 15: Plaquemines Parish Demographics and Damage Summary

Location	Census Owner Occupied	Owners w/ Damage	% Owner Damage	Census Renter Occupied	Renters w/ Damage	% Renters Damage	Damage Concentration
Belle Chasse	2,835	361	13%	1,628	71	4%	10%
Boothville	267	188	70%	35	33	94%	73%
Buras-Triumph	356	345	97%	63	49	78%	94%
Empire	346	271	78%	45	40	89%	80%
Port Sulphur	522	450	86%	59	56	95%	87%
Venice	60	32	53%	11	3	27%	49%
Rest of Parish	1,652	1,133	69%	197	246	124%	75%
Total	**6,038**	**2,780**	**46%**	**2,038**	**497**	**24%**	**41%**

Source: FEMA IA, April 2013

Damage from Hurricane Isaac was extensive and widespread along both the Mississippi River's east and west banks in Plaquemines Parish. In total, 41 percent of the parish's households reported some level of damage, including 46 percent of the parish's owner-occupied household population and 24 percent of the parish's renter household population. However, it is important to note the parish's most extensive flooding occurred in communities outside of the parish's CDPs, specifically Braithwaite. Braithwaite accounts for almost half of the owner-occupied damaged households in "Rest of Parish," and, due to the high levels of damage there, Braithwaite alone accounts for 70 percent of the FEMA verified loss in dollars.

Outside of this area, the highest concentrations of damage were located in the Buras-Triumph area (94 percent of households reporting damage), Port Sulphur (87 percent of households reporting damage) and Empire (80 percent of households reporting damage). In all, it is important to note the vast majority of damage occurred outside the population center, Belle Chasse.

Much of the owner-occupied damage was split between single-family homes and mobile homes, which together accounted for more than 93 percent of all owner-occupied instances of damage. From a monetary standpoint, these two housing types accounted for more than $29 million in RP FVL, or more than 97 percent of the total RP FVL reported. As of July 2013, the FEMA IA program had distributed in excess of $10.9 million in grants to homeowners for repairs and rebuilding in the parish. Concurrently, as of May 1, 2013, the SBA program had approved 341 home loans worth more than $23.7 million.

Tables 16 and 17 illustrate the predominance of single-family and mobile housing damage, as well as its prevalence outside of the parish's CDPs.

Table 16: Damage Breakdown of Owner-Occupied Households by Type in Plaquemines Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL
Boat	12	$13,680.85	$164,170.15
Condo	2	$8,265.80	$16,531.60
House	853	$24,206.99	$20,648,560.09
Mobile Home	1,740	$5,163.58	$8,984,631.52
Other	4	$12,442.91	$49,771.64

Townhouse	2	$519.49	$1,038.97
Travel Trailer	167	$3,467.16	$579,015.03
Total	**2,780**	**$10,950.98**	**$30,443,719.00**

Source: FEMA IA, April 2013

Table 17: RP FVL Breakdown of Owner-Occupied Households by Location in Plaquemines Parish

Location	# Damaged	Ave. RP FVL	Total RP FVL
Belle Chasse	361	$ 1,362.28	$491,783.96
Boothville	188	$ 2,583.07	$485,618.02
Buras-Triumph	345	$ 2,544.33	$877,795.04
Empire	271	$ 2,400.87	$650,636.75
Port Sulphur	450	$ 2,614.42	$1,176,489.73
Venice	32	$ 1,414.37	$45,259.99
Rest of Parish	1,133	$ 23,580.00	$26,716,135.51
Total	**2,780**	**$10,950.98**	**$30,443,719.00**

Source: FEMA IA, April 2013

Much like in St. John the Baptist and Isaac's statewide impact, LMI populations in Plaquemines Parish were largely represented in the FEMA IA inspection data. In total, LMI households accounted for more than 61 percent of all owner-occupied households with damage and approximately 48 percent of the value of all owner-occupied damages reported.

Table 18: Damage Breakdown of Owner-Occupied Households by Income in Plaquemines Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
LMI	1,699	$8,611.33	$14,630,652.66	61.12%
Not LMI	1,081	$14,628.18	$15,813,066.34	38.88%
Total	**2,780**	**$10,950.98**	**$30,443,719.00**	**100.00%**

Source: FEMA IA, April 2013

Table 19 illustrates the breakdown of damage in the parish by insurance type and income level. Of particular concern, LMI damages increase in categories not expected to have damages covered through traditional hazard insurance or through the NFIP. The state is especially concerned about the population of 164 flooded LMI households with no flood insurance coverage and the 752 LMI households with no hazard coverage that suffered damage.

Table 19: Insurance Status of Damaged, Flooded Homeowners in Plaquemines Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
NFIP Covered – Not LMI	233	$51,871.42	$12,086,039.95	38.45%
NFIP Covered – LMI	145	$47,778.23	$6,927,843.76	23.93%
No NFIP - Not LMI	69	$28,677.07	$1,978,717.91	11.39%
No NFIP – LMI	164	$29,149.57	$4,634,781.30	26.24%
Total	**611**	**$42,289.41**	**$25,627,382.92**	**100.00%**

Source: FEMA IA, April 2013

Table 20: Insurance Status of Damaged, Not Flooded Homeowners in Plaquemines Parish

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
Hazard Covered – Not LMI	504	$1,957.98	$986,820.16	23.18%
Hazard Covered – LMI	638	$1,674.35	$1,068,234.23	29.35%
No Hazard Ins – Not LMI	275	$2,769.05	$761,488.32	12.65%
No Hazard Ins – LMI	752	$2,659.30	$1,999,793.37	34.82%
Total	**2,169**	**$2,220.53**	**$4,816,336.08**	**100.00%**

Source: FEMA IA, April 2013

Plaquemines also had a large population of households with damages classified as "Major-High" or "Severe." In total, 556 owner-occupied households had extensive damage, with 290 of those households – or 52 percent – also categorized as LMI. The state anticipates these populations will have extensive unmet needs.

Table 21: Levels of Damage for Owner-Occupied Households in Plaquemines Parish

	All Owner Occupied			LMI Owner Occupied				
Type	# Damaged	Ave. RP FVL	Total RP FVL	# Damaged	Ave. RP FVL	Total RP FVL	% Households LMI	% Dollars LMI
Minor-Low	1,846	$976	$1,802,492	1,181	$991	$1,169,977	64%	65%
Minor-High	300	$4,542	$1,362,572	182	$4,445	$809,047	61%	59%
Major-Low	78	$11,077	$864,017	46	$11,042	$507,910	59%	59%
Major-High	129	$18,279	$2,358,051	85	$18,527	$1,574,764	66%	67%
Severe	427	$57,006	$24,056,587	205	$52,845	$10,568,954	48%	44%
Total	**2,780**	**$10,951**	**$30,443,719**	**1,699**	**$8,611**	**$14,630,653**	**61%**	**48%**

Source: FEMA IA, April 2013

Note: LMI calculation based on New Orleans-Metairie-Kenner MSA

In contrast to St. John the Baptist and as noted in Table 15, a significantly lower proportion of Plaquemines Parish's rental population sustained adverse effects from Isaac (46 percent owner-occupied damaged compared to 24 percent renter damaged). While this statistic is significantly less than in St. John the Baptist Parish, it is still significant and includes 389 affected renters that are also classified LMI. As more information is gathered from the state's long-term disaster case management effort, the state continues gathering additional data detailing what, if any, segment of this population has been put at risk for homelessness as a result of the storm.

Table 22: Levels of Damage for Renter Households in Plaquemines Parish

Type	# Damaged (All)	# Damaged (LMI only)	% LMI
Moderate	226	180	80%
Substantial	95	75	79%
Major	150	112	75%
Destroyed	26	22	85%
Total	**497**	**389**	78%

Source: FEMA IA, April 2013

4. Housing Unmet Needs

To calculate its assessment of unmet housing needs, the state largely relied on the framework HUD outlined in Federal Register Vol. 78, No. 103. However, the state believes unmet needs should be calculated at all damage levels. This becomes especially important in rural areas and areas of lower property values – like those most heavily impacted in Isaac – as proportionally more extensively damaged homes are likely to be found even at lower damage tiers. This hypothesis is further supported through the RP FVL-SBA replacement value adjustment analysis conducted below, in which IA applicants with both a reported RP FVL and SBA award were compared to determine an unmet need multiplier.

Table 23: Owner-Occupied Households with RP FVL > $0 and SBA Awards

Damage Level	# Rec. SBA	Avg. RP FVL	Avg. SBA Award	Multiplier
Minor-Low	1,629	$862.58	$19,465.81	22.57
Minor-High	245	$4,667.71	$33,268.16	7.13
Major-Low	179	$12,064.49	$63,402.79	5.26
Major-High	466	$19,694.79	$74,430.47	3.78
Severe	171	$50,230.05	$130,869.01	2.61
Total	**2,690**	**$8,355.16**	**$40,250.11**	**4.82**

Source: FEMA IA, April 2013

With multipliers established at all five owner-occupied damage tiers, it was then applied to the entire IA owner-occupied population, resulting in a total damage estimate in excess of $1.3 billion statewide.

Table 24: Real Property Damage Estimation

Damage Level	# Damaged	Total RP FVL	Multiplier	Damage Estimate
Minor-Low	45,411	$34,474,128	22.57	$777,973,343
Minor-High	4,296	$19,919,419	7.13	$141,971,773
Major-Low	1,754	$20,240,386	5.26	$106,369,790
Major-High	3,042	$56,925,010	3.78	$215,130,722
Severe	1,034	$43,129,830	2.61	$112,370,144
Total	**55,537**	**$174,688,774**		**$1,353,815,772**

Source: FEMA IA, April 2013

While the state is in agreement with the $1.3 billion damage estimate methodology, it recognizes the limitations of using the IA population data as a proxy for all damages. Specifically, not all affected households apply for IA, which is apparent when the IA population is compared to insurance claim and disbursement data collected statewide. Specifically, per IA data, hazard insurance settlements totaled in excess of $64 million, while data collected from the Louisiana Department of Insurance (LDI), indicated settlements in excess of $223.7 million. This indicates that the FEMA IA data only represents 29 percent of the hazard insurance payouts statewide. Additionally, it should be noted LDI reported more than 77,000 claims, which is 21,000 more claims than the households reporting damage within IA.

Therefore, the state compared the two known quantities at hand — insurance settlements reported within IA data and those reported statewide — to develop a multiplier for both hazard and NFIP settlements in relation to the IA population.

Given that IA payouts and SBA loans are both intrinsically tied to the IA universe, no adjustment was made to the known quantities in these categories to determine total statewide unmet housing need,

estimated to be in excess of $914 million (see Table 25). However, it should be noted this estimation may be conservative, as it does not account for the impacted rental population. This gap is especially apparent in the state's assessment of Isaac's economic impact, as a large proportion of SBA Business Loans disbursed were to lessors of residential housing. As such, the state may choose to address rental needs through the demand-side needs enumerated through the demonstrated affected renter population, or from the supply-side needs described in the following section of this Action Plan.

Table 25: Unmet Housing Need Estimate (Statewide)

Type	Amount
Total Estimated Real Property Damage	$1,353,815,772
Statewide Flood Insurance Coverage[1]	($95,465,680)
Statewide Hazard Insurance Coverage[2]	($64,408,623)
FEMA IA Assistance	($136,337,885)
SBA Home Loans	($143,540,600)
Total Estimated Unmet Housing Need	**$914,062,984**

Distributing across affected parishes and accounting for hazard insurance, NFIP, IA and SBA payouts, the highest levels of remaining unmet needs are estimated to be in Jefferson ($164.7 million), St. John the Baptist ($123.9 million), Orleans ($109.7 million), Tangipahoa ($74.0 million), Plaquemines ($66.3 million) and St. Tammany parishes ($62.0 million).

Table 26: Unmet Housing Need Estimate by Parish

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Allen	$724,531	$0.00	$0	($42,806)	$0	$681,725
Ascension	$21,326,325	($227,312)	($624,489)	($1,997,278)	($798,800)	$17,678,446
Assumption	$12,227,751	($49,911)	$0	($1,120,141)	($302,000)	$10,755,699
East Baton Rouge	$18,852,976	($260,773)	($33,033)	($2,140,813)	($540,100)	$15,878,257
East Feliciana	$3,440,072	($104,750)	$0	($321,464)	($258,200)	$2,755,657
Iberville	$10,658,672	($30,310)	($95,094)	($1,024,313)	($136,300)	$9,372,654
Jefferson	$224,832,905	($9,040,576)	($5,301,004)	($19,044,322)	($26,705,200)	$164,741,803
Lafourche	$42,119,617	($360,417)	($300,246)	($4,209,831)	($1,837,600)	$35,411,522
Livingston	$66,870,605	($1,429,157)	($4,116,311)	($8,132,905)	($2,727,500)	$50,464,733
Morehouse	$695,377	($6,165)	$0	($30,755)	$0	$658,457
Orleans	$145,745,892	($3,237,181)	($2,228,159)	($14,862,365)	($15,715,900)	$109,702,287
Plaquemines	$126,517,152	($10,029,952)	($15,468,068)	($10,977,921)	($23,736,100)	$66,305,111
Pointe Coupee	$1,492,382	($7,622)	$0	($68,852)	($8,600)	$1,407,308
St. Bernard	$39,970,141	($983,291)	($673,914)	($2,751,318)	($4,102,500)	$31,459,117
St. Charles	$28,260,807	($510,228)	($143,700)	($2,583,197)	($2,373,700)	$22,649,982
St. Helena	$10,270,904	($46,705)	$0	($819,728)	($214,900)	$9,189,571
St. James	$20,616,539	($442,219)	($174,050)	($1,619,723)	($998,300)	$17,382,247
St. John the Baptist	$281,166,289	($31,155,650)	($47,710,796)	($33,061,539)	($45,239,900)	$123,998,404
St. Martin	$3,913,914	($14,373)	$0	($275,931)	($9,600)	$3,614,010
St. Mary	$25,546,726	($61,604)	$0	($2,404,258)	($247,300)	$22,833,564
St. Tammany	$105,212,179	($4,088,900)	($16,096,326)	($10,303,180)	($12,695,500)	$62,028,272

[1] **Source: FEMA NFIP data – March 2013 multiplied by 0.29 to estimate proportion of NFIP payments within the IA applicant pool.**
[2] **Source: FEMA IA data – reflects only those hazard insurance payments of IA applicants**

Tangipahoa	$92,665,579	($1,352,458)	($1,969,408)	($11,858,014)	($3,456,800)	$74,028,900
Terrebonne	$39,614,877	($403,868)	($71,737)	($3,672,068)	($833,500)	$34,633,703
Washington	$25,406,549	($512,169)	($386,889)	($2,564,618)	($501,500)	$21,441,373
West Baton Rouge	$3,962,544	($31,332)	($6,534)	($328,479)	($100,800)	$3,495,399
West Feliciana	$1,545,718	($15,795)	$0	($122,065)	$0	$1,407,857
All Other Parishes	$158,751	($5,900)	($65,923)	$0	$0	$86,928
Total	**$1,353,815,772**	**($64,408,623)**	**($95,465,680)**	**($136,337,885)**	**($143,540,600)**	**$914,062,985**

C. Economic Development

1. Statewide Damage Assessment

The impact of Hurricane Isaac on Louisiana's economy is attributable primarily to the storm's path and slow movement. The negative impacts began on Monday, August 27, 2012, as businesses in the coastal parishes began to close in preparation for the storm, peaking on Wednesday, August 29. Estimates of the gross impact of Hurricane Isaac are based on a combination of evacuation orders, school closures, outage data and anecdotal accounts collected by the Louisiana Department of Economic Development, which are based on interviews of the largest impacted businesses and business organizations in all areas likely to be impacted by the event.

Using data from County Business Patterns, the results peak on Wednesday, August 29, with a low estimate of 768,000 private employees affected and a high estimate of 1.2 million private employees affected. This translates to a range from one-half to three-quarters of Louisiana's workforce impacted at the peak. Similar results using Quarterly Census of Employment and Wages data to include the public imply a range of 900,000 to 1,400,000 total workers. It should be noted that these results are slightly smaller than the Census On-the-Map tool would imply due to the tool's assumption that a portion of workers continued to work. That portion varies by area and day to reflect the use of generators and the fact that some employees continued to work due to the nature of their occupation (for example medical employees or others working during emergency operations).

Focusing again on private sector employees and the Survey of Current Business results, the computations indicate a gross loss of $316 million to $452 million in wages over the period August 27 through September 6. Because some of the workers are salaried employees who likely saw little if any change in compensation, and some hourly workers may also have received compensation for work on those days, the results should not be interpreted as net lost wages. Even if employees were paid, there is a cost in terms of lost productivity. In terms of the gross impact on Louisiana's Gross Domestic Product (GDP), the low estimate of the range places this impact at just under $1 billion dollars, with an upper bound of approximately $1.4 billion. This is relative to $213.6 billion annual GDP and places the gross impact at 0.46% (low) or 0.65% (high) of GDP. This impact range is consistent with reports by the petrochemical sector and other businesses on closures during Hurricane Isaac.

While such estimations are crucial in assessing Isaac's total economic impact, SBA disaster loan data provides a more appropriate proxy to measure tangible property losses and business interruptions. Using this data, and accounting for SBA's reported 35 percent disaster loan approval rate, the state estimates total business damage to be in excess of $72.6 million. As expected, many of these damages were reported in the state's known clusters of economic activity, notably in Jefferson and Orleans parishes. However, estimated damages in St. John the Baptist, St. Tammany, St. Bernard, Plaquemines and Tangipahoa parishes are notable given their relative absence of economic hubs comparable to those found in Jefferson or Orleans. As such, from a community development

perspective, a higher concentration of businesses was likely impacted in these areas and may need to be prioritized in future program design.

Table 27: SBA Disaster Business Loans by Parish

Parish	# Approved	Approved Amount $	Total Estimated Damage
Ascension	3	$45,900	$131,143
Assumption	1	$10,600	$30,286
East Baton Rouge	6	$354,600	$1,013,143
Iberville	1	$2,200	$6,286
Jefferson Davis	1	$315,800	$902,286
Jefferson	135	$7,309,700	$20,884,857
Lafourche	10	$255,700	$730,571
Livingston	5	$118,600	$338,857
Orleans	191	$6,076,000	$17,360,000
Plaquemines	25	$1,351,600	$3,861,714
St. Bernard	27	$1,522,000	$4,348,571
St. Charles	4	$242,700	$693,429
St. Helena	1	$169,700	$484,857
St. James	3	$160,300	$458,000
St. Martin	1	$7,700	$22,000
St. Mary	3	$77,000	$220,000
St. Tammany	45	$1,942,200	$5,549,143
St. John the Baptist	58	$4,019,700	$11,484,857
Tangipahoa	25	$1,147,200	$3,277,714
Terrebonne	5	$212,600	$607,429
Washington	2	$85,900	$245,429
Total	**552**	**$25,427,700**	**$72,650,571**

Source: SBA, May 2013

As described in the housing section of this Action Plan, SBA disaster business loans indicated a disproportionately high level of damage in the real estate sector, specifically to lessors of residential units.

Table 28: SBA Disaster Business Loans by Industry (Statewide)

NAICS Industry	# Approved	Approved Amount $	Total Estimated Damage
Accommodation and Food Services	42	$2,716,800	$7,762,286
Administrative and Support and Waste Management and Remediation Services	9	$117,500	$335,714
Agriculture, Forestry, Fishing and Hunting	35	$797,800	$2,279,429
Arts, Entertainment, and Recreation	10	$2,005,800	$5,730,857
Construction	14	$1,009,900	$2,885,429
Finance and Insurance	2	$24,300	$69,429
Health Care and Social Assistance	14	$789,500	$2,255,714
Information	3	$109,200	$312,000
Manufacturing	6	$246,500	$704,286
Other Services (except Public Administration)	63	$4,505,500	$12,872,857
Professional, Scientific and Technical Services	17	$597,200	$1,706,286
Real Estate and Rental and Leasing	285	$10,130,100	$28,943,143
Retail Trade	33	$1,480,500	$4,230,000
Transportation and Warehousing	13	$502,900	$1,436,857

Wholesale Trade	6	$394,200	$1,126,286
Total	**552**	**$25,427,700**	**$72,650,571**

Source: SBA, May 2013

2. St. John the Baptist Parish

SBA approved a total of 58 disaster business loans in St. John the Baptist Parish in Isaac's aftermath, worth more than $4 million in loan disbursements. This accounts for approximately 11 percent of the 552 loans approved statewide and 16 percent of statewide loan disbursements. Accounting for SBA's reported 35 percent approval rate, the state estimates more than $11 million in Isaac-related business damages in St. John the Baptist Parish. Industries with the highest levels of estimated damage were lessors of residential buildings and dwellings ($4.7 million estimated damage) and hotels ($2.8 million estimated damage).

Table 29: SBA Disaster Business Loans by Industry in St. John the Baptist Parish

NAICS Industry	# Approved	Approved Amount	Total Estimated Damage
114112 - Shellfish Fishing	1	$38,300	$109,429
115112 - Soil Preparation, Planting, and Cultivating	1	$22,200	$63,429
236117 - New Housing Operative Builders	1	$158,000	$451,429
236220 - Commercial and Institutional Building Construction	1	$88,800	$253,714
424910 - Farm Supplies Merchant Wholesalers	1	$14,800	$42,286
445210 - Meat Markets	1	$14,000	$40,000
453310 - Used Merchandise Stores	1	$3,000	$8,571
484110 - General Freight Trucking, Local	1	$24,100	$68,857
484121 - General Freight Trucking, Long-Distance, Truckload	2	$73,400	$209,714
488490 - Other Support Activities for Road Transportation	1	$42,300	$120,857
531110 - Lessors of Residential Buildings and Dwellings	29	$1,652,500	$4,721,429
531120 - Lessors of Nonresidential Buildings (except Miniwarehouses)	1	$190,300	$543,714
541320 - Landscape Architectural Services	1	$22,400	$64,000
561499 - All Other Business Support Services	1	$8,000	$22,857
561611 - Investigation Services	1	$7,400	$21,143
561730 - Landscaping Services	1	$28,500	$81,429
621210 - Offices of Dentists	1	$33,800	$96,571
624410 - Child Day Care Services	1	$98,000	$280,000
721110 - Hotels (except Casino Hotels) and Motels	1	$1,000,000	$2,857,143
722211 - Limited-Service Restaurants	1	$66,400	$189,714
722330 - Mobile Food Services	1	$12,100	$34,571
722410 - Drinking Places (Alcoholic Beverages)	2	$101,300	$289,429
812112 - Beauty Salons	2	$8,900	$25,429
813110 - Religious Organizations	4	$311,200	$889,143
Total	**58**	**$4,019,700**	**$11,484,857**

Source: SBA, May 2013

3. Plaquemines Parish

SBA approved a total of 25 disaster business loans in Plaquemines Parish in Isaac's aftermath, worth more than $1.3 million in loan disbursements. This accounts for slightly more than 4.5 percent of the 552 loans approved statewide and more than 5.3 percent of statewide loan disbursements. Again, accounting for SBA's reported 35 percent approval rate, the state estimates a total of $3.8 million in Isaac-related business damages in Plaquemines Parish. As in St. John the

Baptist, lessors of residential buildings and dwellings were estimated to have high proportions of damage ($1.8 million). The state is also mindful of damages estimated to have been incurred by the fishing industry ($712,000), especially given that industry's relative importance within the greater Plaquemines economy.

Table 30: SBA Disaster Business Loans by Industry in Plaquemines Parish

NAICS Industry	# Approved	Approved Amount $	Total Estimated Damage
114112 - Shellfish Fishing	10	$249,200	$712,000
238150 - Glass and Glazing Contractors	1	$108,500	$310,000
445120 - Convenience Stores	1	$106,600	$304,571
484110 - General Freight Trucking, Local	1	$93,700	$267,714
517919 - All Other Telecommunications	1	$100,000	$285,714
531110 - Lessors of Residential Buildings and Dwellings	8	$652,400	$1,864,000
541990 - All Other Professional, Scientific and Technical Services	1	$10,200	$29,143
561320 - Temporary Help Services	1	$10,300	$29,429
812112 - Beauty Salons	1	$20,700	$59,143
Total	**25**	**$1,351,600**	**$3,861,714**

Source: SBA, May 2013

4. Economic Development Unmet Needs

To calculate unmet economic need, the state adjusted for the amount already paid out in SBA business loans. The result is an estimated total unmet need in excess of $47.2 million.

Table 31: Economic Development Unmet Needs by Parish

Parish	# Approved	Approved Amount	Total Estimated Damage	Unmet Need
Ascension	3	$45,900	$131,143	$85,243
Assumption	1	$10,600	$30,286	$19,686
East Baton Rouge	6	$354,600	$1,013,143	$658,543
Iberville	1	$2,200	$6,286	$4,086
Jefferson Davis	1	$315,800	$902,286	$586,486
Jefferson	135	$7,309,700	$20,884,857	$13,575,157
Lafourche	10	$255,700	$730,571	$474,871
Livingston	5	$118,600	$338,857	$220,257
Orleans	191	$6,076,000	$17,360,000	$11,284,000
Plaquemines	25	$1,351,600	$3,861,714	$2,510,114
St. Bernard	27	$1,522,000	$4,348,571	$2,826,571
St. Charles	4	$242,700	$693,429	$450,729
St. Helena	1	$169,700	$484,857	$315,157
St. James	3	$160,300	$458,000	$297,700
St. Martin	1	$7,700	$22,000	$14,300
St. Mary	3	$77,000	$220,000	$143,000
St. Tammany	45	$1,942,200	$5,549,143	$3,606,943
St. John the Baptist	58	$4,019,700	$11,484,857	$7,465,157
Tangipahoa	25	$1,147,200	$3,277,714	$2,130,514
Terrebonne	5	$212,600	$607,429	$394,829
Washington	2	$85,900	$245,429	$159,529
Total	**552**	**$25,427,700**	**$72,650,571**	**$47,222,871**

D. Infrastructure

1. Statewide Damage Assessment

Louisiana has a long and well-documented history of adverse effects from both natural and man-made disasters, including those outlined in action plans for previous CDBG-DR awards related to hurricanes Katrina, Rita, Gustav and Ike. Existing infrastructure issues related to water management are apparent and were exacerbated during and in the aftermath of Hurricane Isaac. As such, the state may design programs or allocate funds to parishes for projects related to drainage, pumping stations, transportation enhancements or other infrastructure needs in its ongoing effort to rebuild in a safe, sustainable, resilient way. In this sense, the state plans to direct funds to Isaac-impacted areas in such a way that ensures coordination with previous and ongoing efforts related to resilience from future disasters.

To determine the state's unmet infrastructure needs, OCD/DRU has coordinated with the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) to collect relevant data through FEMA's Public Assistance (PA) program. The following table illustrates how those damages are documented and categorized.

Table 32: FEMA PA Categories

Type	Definition
A	*Debris Removal*
B	*Emergency Protective Measures*
C	*Road Systems and Bridges*
D	*Water Control Facilities*
E	*Public Buildings and Contents*
F	*Public Utilities*
G	*Parks, Recreational and Other Items*

Based on these categories, the state documented its highest level of need in Categories A and B, which are often regarded as short-term actions during and in the immediate aftermath of a particular event. In categories C through G, obligations for public buildings and contents exceeded $74 million and can be considered a proxy for real property damages. Additionally, state government and individual parishes applying for PA are responsible for a 25 percent cost share, which currently exceeds $114 million statewide.

Table 33: Breakdown of FEMA PA Funding by Category

Category	Total	25% Cost Share
A	$92,336,763.34	$23,084,190.84
B	$252,183,961.44	$63,045,990.36
C	$9,043,931.47	$2,260,982.87
D	$4,049,237.00	$1,012,309.25
E	$74,401,597.48	$18,600,399.37
F	$12,718,801.19	$3,179,700.30
G	$12,811,655.07	$3,202,913.77
Total	**$457,545,946.99**	**$114,386,486.75**

Source: GOHSEP, July 2013

The state has calculated unmet infrastructure need by using the total 25 percent PA cost share, exceeding $114 million, since this represents the remaining local obligation for infrastructure repairs once insurance and FEMA PA are considered. The rationale for this is simple: as Isaac-impacted areas that had been adversely impacted by previous storms, any fiscal obligation incurred on account of Isaac actively prevents a parish from investing in projects designed to make that parish more sustainable and resilient as it encounters future weather events. Examples of this include those parishes with the largest PA cost shares: Plaquemines ($27.0 million), Orleans ($12.7 million), St. John the Baptist ($11.7 million) and Jefferson ($11.0 million). All were heavily impacted and have been awarded CDBG-DR allocations in the aftermath of hurricanes Katrina, Rita, Gustav and Ike. Therefore, as part of a safe, sound rebuilding effort designed to mitigate future losses, the state believes it is in the interest of government at all levels – local, state and national – to consider the full, category A through G, cost share as unmet infrastructure needs.

Table 34: Breakdown of FEMA PA by Parish

Parish	Total	Total C-G	Total 25% Match	C-G 25% Match
Acadia	$2,686.81	$0	$671.70	$0
Allen	$10,258.52	$0	$2,564.63	$0
Ascension	$2,492,433.82	$214,183.99	$623,108.46	$53,546.00
Assumption	$137,052.98	$22,348.00	$34,263.25	$5,587.00
Avoyelles	$98,834.92	$0	$24,708.73	$0
Bossier	$24,379.76	$0	$6,094.94	$0
Caldwell	$83,625.82	$0	$20,906.46	$0
Cameron	$2,504.11	$0	$626.03	$0
Catahoula	$8,816.68	$0	$2,204.17	$0
Concordia	$18,582.01	$0	$4,645.50	$0
East Baton Rouge	$16,042,136.07	$206,018.57	$4,010,534.02	$51,504.64
East Feliciana	$326,196.18	$150,053.89	$81,549.05	$37,513.47
Evangeline	$91,892.58	$0	$22,973.15	$0
Franklin	$40,061.84	$0	$10,015.46	$0
Iberia	$207,156.63	$0	$51,789.16	$0
Iberville	$1,504,820.78	$765,563.98	$376,205.20	$191,391.00
Jackson	$1,355.70	$0	$338.93	$0
Jefferson	$44,118,184.68	$11,917,073.36	$11,029,546.17	$2,979,268.34
La Salle	$14,473.55	$0	$3,618.39	$0
Lafayette	$706,056.23	$13,478.25	$176,514.06	$3,369.56
Lafourche	$9,171,694.61	$4,729,836.65	$2,292,923.65	$1,182,459.16
Lincoln	$27,621.32	$0	$6,905.33	$0
Livingston	$2,432,019.16	$364,821.88	$608,004.79	$91,205.47
Morehouse	$221,888.97	$166,854.00	$55,472.24	$41,713.50
Natchitoches	$8,575.52	$0	$2,143.88	$0
Orleans	$50,816,174.00	$13,925,725.57	$12,704,043.50	$3,481,431.39
Ouachita	$629,537.46	$0	$157,384.37	$0
Plaquemines	$108,003,922.12	$24,008,676.26	$27,000,980.53	$6,002,169.07
Pointe Coupee	$434,151.36	$65,717.95	$108,537.84	$16,429.49

Rapides	$457,215.24	$0	$114,303.81	$0
Richland	$4,254.17	$0	$1,063.54	$0
St. Bernard	$7,205,273.85	$4,065,828.11	$1,801,318.46	$1,016,457.03
St. Charles	$6,386,139.79	$1,140,854.66	$1,596,534.95	$285,213.67
St. Helena	$295,192.74	$31,582.52	$73,798.19	$7,895.63
St. James	$1,500,245.33	$453,918.59	$375,061.33	$113,479.65
St. John the Baptist	$46,828,795.16	$28,848,018.19	$11,707,198.79	$7,212,004.55
St. Landry	$269,652.57	$23,190.95	$67,413.14	$5,797.74
St. Martin	$145,463.64	$0	$36,365.91	$0
St. Mary	$1,233,999.41	$167,298.25	$308,499.85	$41,824.56
St. Tammany	$12,367,161.29	$5,387,345.09	$3,091,790.32	$1,346,836.27
Statewide	$132,328,439.69	$13,941,432.39	$33,082,109.92	$3,485,358.10
Tangipahoa	$2,640,355.51	$574,505.57	$660,088.88	$143,626.39
Terrebonne	$6,240,543.46	$1,397,882.30	$1,560,135.87	$349,470.58
Union	$6,035.31	$0	$1,508.83	$0
Vermilion	$422,818.49	$0	$105,704.62	$0
Washington	$1,050,516.88	$421,655.96	$262,629.22	$105,413.99
West Baton Rouge	$337,402.53	$0	$84,350.63	$0
West Feliciana	$149,347.74	$21,357.28	$37,336.94	$5,339.32
Total	**$457,545,946.99**	**$113,025,222.21**	**$114,386,486.75**	**$28,256,305.55**

Source: GOHSEP, July 2013

2. St. John the Baptist Parish

FEMA PA obligations in St. John the Baptist are more widely distributed by category than most other affected parishes, with more than $17.9 million of obligations in categories A and B, resulting in a 25 percent cost share of more than $4.4 million, and more than $28.8 million of obligations in categories C through G, resulting in a 25 percent cost share of more than $7.2 million. Notably, the parish suffered damage to at least three area schools – Lake Pontchartrain Elementary, West St. John High School and East St. John High School – and a fire house. Combined, the parish has more than $46.8 million in obligations, resulting in a 25 percent cost share in excess of $11.7 million. In addition to the cost share, the parish will likely incur additional costs to upgrade infrastructure. This will drain resources from the parish that would otherwise be available for infrastructure maintenance and other needed improvements.

Table 35: Breakdown of FEMA PA by Category in St. John the Baptist Parish

Category	Total	25% Cost share
A	$7,189,950.35	$1,797,487.59
B	$10,790,826.62	$2,697,706.66
C	$1,700,290.37	$425,072.59
D	$0	$0
E	$23,740,240.56	$5,935,060.14
F	$3,343,876.30	$835,969.08

G	$63,610.96	$15,902.74
Total	**$46,828,795.16**	**$11,707,198.79**

Source: GOHSEP, July 2013

3. Plaquemines Parish

The vast majority of PA obligations in Plaquemines are in categories A and B, debris removal and emergency protective measures. Obligations for these two categories exceed $83.9 million, resulting in a 25 percent cost share of more than $20.9 million. These projects include emergency levee repairs and water control measures. Additionally, the parish had more than $13.4 million of obligations in category E, public buildings and contents. In total, Plaquemines had more than $108 million in obligations for categories A through G, resulting in a cost share of more than $27 million. The burden of this cost share, combined with other FEMA-ineligible costs, divert critical resources from other critical infrastructure projects, particularly levees, drainage projects and other water control measures, which are critical to the long-term viability of the parish.

Table 36: Breakdown of FEMA PA by Category in Plaquemines Parish

Category	Total	25% Cost share
A	$37,971,485.69	$9,492,871.42
B	$46,023,760.17	$11,505,940.04
C	$2,652,747.76	$663,186.94
D	$3,565,898.03	$891,474.51
E	$13,483,913.42	$3,370,978.36
F	$1,419,475.62	$354,868.91
G	$2,886,641.43	$721,660.36
Total	**$108,003,922.12**	**$27,000,980.53**

Source: GOHSEP, July 2013

4. Infrastructure Unmet Needs

The 25 percent of PA category C through G funding is utilized by HUD as a proxy for infrastructure unmet need. The reality on the ground is that there are unmet needs beyond the cost share requirement. In addition to the aforementioned costs incurred by category A and B costs, parish resources are also required to ensure modernization of critical infrastructure. This can include improvements in energy efficiency, modernized IT infrastructure in public facilities and enhanced mitigation measures to prevent damage from future disasters. The unmet needs calculation also does not include water management projects, hardening of transportation corridors or other forward-looking improvements that enhance the long-term resiliency of local communities. As such, the estimates of unmet need considered above are likely underestimated, and parishes will be encouraged to invest their CDBG-DR allocations in projects that improve the long-term resilience and viability of their communities.

E. Summary of Unmet Needs and Additional Considerations

1. Categories of Unmet Needs

Combining the above unmet needs analyses across housing, economic and infrastructure sectors, the state estimates in excess of $1.075 billion in remaining unmet needs, with $914 million in housing need, $47.2 million in economic need and $114.4 million in infrastructure need. The top 10 parishes, by need, per this analysis are: Jefferson ($189.3 million), St. John the Baptist ($143.2 million), Orleans ($133.7 million), Plaquemines ($95.8 million), Tangipahoa ($76.8 million), St. Tammany ($68.7 million), Livingston ($51.3 million), Lafourche ($38.2 million), Terrebonne ($36.6 million) and St. Bernard ($36.1 million). As the following section "Strategies to Address Unmet Needs" outlines, the state will provide separate allocations to St. John the Baptist and Plaquemines parishes, which are the top two most impacted parishes that did not receive allocations as entitlement communities. Additionally, the state will set aside funds to address remaining needs illustrated in the remaining impacted parishes. The state may do this through smaller allocations to those individual parishes or through state-run programs encompassing them as a group.

Table 37: Total Unmet Needs by Parish

Parish	Housing	Economic	Infrastructure	Total Unmet Needs
Acadia	$0	$0	$671.70	$671.70
Allen	$681,724.71	$0	$2,564.63	$684,289.34
Ascension	$17,678,446.34	$85,243.00	$623,108.46	$18,386,797.80
Assumption	$10,755,698.50	$19,686.00	$34,263.25	$10,809,647.75
Avoyelles	$0	$0	$24,708.73	$24,708.73
Bossier	$0	$0	$6,094.94	$6,094.94
Caldwell	$0	$0	$20,906.46	$20,906.46
Cameron	$0	$0	$626.03	$626.03
Catahoula	$0	$0	$2,204.17	$2,204.17
Concordia	$0	$0	$4,645.50	$4,645.50
East Baton Rouge	$15,878,257.10	$658,543.00	$4,010,534.02	$20,547,334.12
East Feliciana	$2,755,657.25	$0	$81,549.05	$2,837,206.30
Evangeline	$0	$0	$22,973.15	$22,973.15
Franklin	$0	$0	$10,015.46	$10,015.46
Iberia	$107,676.83	$0	$51,789.16	$159,465.99
Iberville	$9,372,653.93	$4,086.00	$376,205.20	$9,752,945.13
Jackson	$0	$0	$338.93	$338.93
Jefferson	$164,741,803.21	$13,575,157.00	$11,029,546.17	$189,346,506.38
Jefferson Davis	$42,228.94	$586,486.00	$0	$628,714.94
La Salle	$0	$0	$3,618.39	$3,618.39
Lafayette	($34,377.71)	$0	$176,514.06	$142,136.35
Lafourche	$35,411,522.25	$474,871.00	$2,292,923.65	$38,179,316.90
Lincoln	$0	$0	$6,905.33	$6,905.33
Livingston	$50,464,732.56	$220,257.00	$608,004.79	$51,292,994.35
Morehouse	$658,457.28	$0	$55,472.24	$713,929.52
Natchitoches	$0	$0	$2,143.88	$2,143.88
Orleans	$109,702,287.15	$11,284,000.00	$12,704,043.50	$133,690,330.65
Ouachita	($4,226.64)	$0	$157,384.37	$153,157.73
Plaquemines	$66,305,110.53	$2,510,114.00	$27,000,980.53	$95,816,205.06
Pointe Coupee	$1,407,307.98	$0	$108,537.84	$1,515,845.82
Rapides	($22,381.82)	$0	$114,303.81	$91,921.99
Richland	$0	$0	$1,063.54	$1,063.54

St. Bernard	$31,459,116.92	$2,826,571.00	$1,801,318.46	$36,087,006.38
St. Charles	$22,649,981.96	$450,729.00	$1,596,534.95	$24,697,245.91
St. Helena	$9,189,571.30	$315,157.00	$73,798.19	$9,578,526.49
St. James	$17,382,246.80	$297,700.00	$375,061.33	$18,055,008.13
St. John the Baptist	$123,998,403.99	$7,465,157.00	$11,707,198.79	$143,170,759.78
St. Landry	$0	$0	$67,413.14	$67,413.14
St. Martin	$3,614,010.29	$14,300.00	$36,365.91	$3,664,676.20
St. Mary	$22,833,563.96	$143,000.00	$308,499.85	$23,285,063.81
St. Tammany	$62,028,272.04	$3,606,943.00	$3,091,790.32	$68,727,005.36
Statewide	$0	$0	$33,082,109.92	$33,082,109.92
Tangipahoa	$74,028,899.68	$2,130,514.00	$660,088.88	$76,819,502.56
Terrebonne	$34,633,702.83	$394,829.00	$1,560,135.87	$36,588,667.70
Union	$0	$0	$1,508.83	$1,508.83
Vermilion	$0	$0	$105,704.62	$105,704.62
Vernon	($1,991.91)	$0	$0	($1,991.91)
Washington	$21,441,372.94	$159,529.00	$262,629.22	$21,863,531.16
West Baton Rouge	$3,495,398.65	$0	$84,350.63	$3,579,749.28
West Feliciana	$1,407,856.80	$0	$37,336.94	$1,445,193.74
Total	**$914,062,984.64**	**$47,222,872.00**	**$114,386,486.75**	**$1,075,672,343.39**

2. Use of Urgent Need

As a result of Hurricane Isaac, there were widespread incidences of:

- Flooding and wind damage of public facilities;
- Interruption of electricity and sewer services;
- Damage to roads and bridges;
- Lack of water redundancy;
- Displaced residents and an increase in homelessness;
- Loss of/limited transportation and mobility as a result of damage to private vehicles and public transportation;
- Leveling of homes and rental units with significant damage;
- Interruption to and loss of businesses and their services;
- Severe flooding due to limited drainage; and
- Short- and long-term damages to industries, such as commercial fishing, forestry, farming, cattle, etc.

Therefore, the state may use Urgent Need to address any or all of the above impacts.

3. Additional Considerations, Including Mitigation Measures

Hurricane Isaac was a significant flood event, with FEMA-documented flooding of more than 16,800 homes. Of these, 10,800 were owner-occupied and about two-thirds of these (7,187) had major or severe damage. Although 61 percent of the owner-occupied damaged homes carried flood insurance, the additional costs to mitigate through elevation may be cost prohibitive for some homeowners. Even those determined eligible for HMGP will be required to provide a cost share of 25 percent, which would likely mean an additional $20,000 for a typical residential home. The 39 percent that did not carry flood insurance at all will have even greater burdens if the additional costs of mitigation are added to their rebuilding costs.

Per Federal Register Vol. 78, No. 76, HUD has stipulated specific requirements regarding sustainable rebuilding efforts as part of its disaster recovery programs. These requirements include "elevating or flood proofing new construction and substantial improvements to one foot above the base flood elevation" for those projects within special flood hazard areas or equivalent in FEMA's "most recent and current data source." Recognizing the state's long and well-documented history of flooding, as well as its ongoing efforts to mitigate future flooding in its most vulnerable areas, the state is committed to upholding both the spirit and the letter of these requirements. In assessing unmet needs it is important to consider the additional costs of safeguarding housing and community development investments from future disasters. As such, Louisiana will not only be assessing parish applications and considering state-run programs that replace or repair lost property but will also be seeking to invest resources in efforts that mitigate damage from future disasters. Although initially more costly, these efforts are necessary to ensure the long-term viability of Isaac-affected communities.

II. Strategies to Address Unmet Needs

A. Connection Between Needs Assessment and Allocation of Funds

Hurricane Isaac caused extensive damage throughout Southeast Louisiana. FEMA declared 26 parishes eligible for FEMA IA: Allen, Ascension, Assumption, East Baton Rouge, East Feliciana, Iberville, Jefferson, Lafourche, Livingston, Morehouse, 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. Of those parishes, HUD's unmet needs analysis identified five parishes as "most impacted", meaning that HUD's methodology identified at least $10 million dollars of combined unmet need in the categories of housing, economic development and infrastructure. Those parishes identified as "most impacted" are St. John the Baptist, Plaquemines, Jefferson, Orleans and St. Tammany.

All activities funded using CDBG-DR dollars allocated to Louisiana will be located in a presidentially-declared parish that is eligible for Hurricane Isaac recovery assistance. The State of Louisiana is committed to ensuring that allocations are distributed in proportion to the unmet recovery needs while allowing an appropriate level of local control and input into final programmatic decisions. Resources are being allocated to the most impacted parishes – St. John the Baptist and Plaquemines – utilizing the same methodology that HUD used to develop its allocations to states and entitlement areas. This will provide resources consistent to those already provided directly to the entitlement areas of Orleans, Jefferson and St. Tammany parishes. The current allocations, rounded to the nearest $1,000, for the top five parishes are as follows:

Table 38: Allocation of Recovery Funds by Parish

Parish	Severe Unmet Needs for Housing	Severe Unmet Needs for Business	Infrastructure Allocation	Total	Percent of Total Need (HUD)*	HUD Allocation Model
St. John the Baptist	$32,209,028	$11,049,976	$8,411,883	$51,670,887	30.6%	$32,674,000
Plaquemines	$20,667,472	$2,423,598	$3,718,127	$26,809,196	15.9%	$16,953,000
Jefferson	$10,250,725	$9,633,152	$6,134,723	$26,018,599	15.4%	$16,453,000
Orleans	$6,184,001	$10,747,964	$6,838,585	$23,770,550	14.1%	$15,031,000
St. Tammany	$7,997,165	$3,467,473	$2,603,630	$14,068,268	8.3%	$10,914,916

***Based on HUD's assessment of total need used as a denominator to determine allocations of entitlement areas**

B. Allocation of Funds

As indicated above, Louisiana will apply the HUD formula to determine a direct allocation to the two most impacted parishes that did not receive a direct allocation: St. John the Baptist and Plaquemines parishes. The remainder of the state's resources will be used for recovery needs in the parishes within the 26 IA-eligible parishes that did not meet HUD's $10 million threshold, especially those parishes that had significant areas of concentrated damages. The Initial Action Plan, which was approved by HUD on November 4, 2013, obligates funds at the state and parish levels for administrative costs to cover initial planning and the development of Partial Action Plans. The dollar amounts provided in the initial obligations represent the expected initial need for direct administration. The remaining will be requested as needed through the Partial Action Plan and Non-Substantial Amendment submittal process. The total allocations and obligations for the Initial Action Plan (approved by HUD on November 4, 2013), Partial Action Plan #1 (approved by HUD on January 2, 2014), Partial Action Plan #2 (approved by HUD on September 23, 2014), Partial Action Plan #3 (approved by HUD on September 23, 2014), Partial Action Plan #4 (approved by HUD on November 28, 2014), Master Action Plan Version #2 (submitted to HUD on December 5, 2014), and Master Action Plan Version #3 (submitted to HUD on July 14) are indicated below:

Table 39: Louisiana's Allocations and Obligations of CDBG-DR Funds for Recovery from Hurricane Isaac

Allocations	Total Allocation	% of Allocation	Obligation in Initial Action Plan / Grant Agreement #1	Obligation in Partial Action Plan #1 / Grant Agreement #2	Re-Obligation in Partial Action Plan #2 / Grant Agreement #2	Obligation in Partial Action Plan #3 / Grant Agreement #3	Obligation in Partial Action Plan #4 / Grant Agreement #4	Re-Obligation in Master Action Plan v3 / Grant Agreement #2	Obligation in Master Action Plan v3 / Grant Agreement #5	Re-Obligation in Master Action Plan v3 / Grant Agreement #2	Obligation in Master Action Plan v3 / Grant Agreement #6	To be Obligated in the Future
St. John the Baptist	$ 32,674,000	50.8%	$ 55,000	$ -	$ -	$ -	$1,083,398	$ 617,627	$ -	$ 740,925.99	$ 7,525,594	$22,651,455.01
Plaquemines Parish	$ 16,953,000	26.3%	$ 29,000	$ -	$ -	$ 800,000	$ -	$ 300,000	$ -	$ -		$15,824,000.00
FEMA Cost-Share	$ 5,886,000	9.1%	$ -	$5,886,000	$ -	$ -	$ -	$ -	$ -	$ -		$ -
LMI HMA Cost-Share	$ 3,021,084	4.7%	$ -	$1,740,000	$ (650,000)	$ -	$ -	$ -	$ -	$ (868,500.23)		$ 2,799,584.23
State Admin., Planning and Program Delivery	$ 3,320,000	5.2%	$ 700,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 127,574.24		$ 2,492,425.76
Parish Recovery Priority Projects	$ 1,100,000	1.7%	$ -	$1,100,000	$ -	$ -	$ -	$ (267,627)	$ -	$ -		$ 267,627.00
Homeowner Rehabilitation Program	$ 1,425,000	2.2%	$ -	$ -	$ 650,000	$ -	$ -	$ (650,000)	$ 712,500	$ -		$ 712,500.00
Total	**$ 64,379,084**	**100.0%**	**$ 784,000**	**$8,726,000**	**$ -**	**$ 800,000**	**$1,083,398**	**$ -**	**$ 712,500**	**$ 0.00**	**$ 7,525,594**	**$44,747,592.00**

Note that per Federal Register Vol. 78 No. 103, HUD requires 80 percent of the state's total allocation, including those dollars provided directly to entitlement communities, to be targeted to those parishes designated "most impacted or distressed." For Louisiana, this means that a minimum of $45,042,400 must be directed to those most impacted parishes. The St. John the Baptist and Plaquemines parish allocations, combined with the additional grant being provided to St. Tammany, total $51,646,000, exceeding the requirement by approximately 15 percent, or $6,603,600.

1. Allocations to Most Impacted Parishes

Per the allocation methodology defined by HUD in Federal Register Vol. 78, No. 76, the two most impacted parishes in Louisiana are St. John the Baptist and Plaquemines parishes. Utilizing this same methodology and data provided by HUD, OCD/DRU allocates the following amounts to the most impacted parishes:

St. John the Baptist: $32,674,000
Plaquemines: $16,953,000

These allocations are provided to the local governments based on relative damages and unmet needs. However, local governments will have significant leeway to determine their priorities to the extent that those priorities are reflective of a community-based approach, are directly associated with the impacts of Hurricane Isaac and are eligible under CDBG-DR regulations. The parishes of St. John the Baptist and Plaquemines are each undergoing a recovery planning process under the National Disaster Recovery Framework (NDRF), described in greater detail in Section III, to establish their rebuilding and mitigation priorities. Partial Action Plans or Action Plan Amendments will be submitted by the state on behalf of the parish governments once the State of Louisiana has reviewed proposals submitted. The following criteria will be used in assessing the plans:

- Were Public Housing Authorities consulted to determine if there are unmet needs are a result of the hurricane?
- Are the projects consistent with community priorities as indicated in their recovery planning process?
- Do projects target sub-parish areas hit hardest by Hurricane Isaac?
- Will at least 50 percent of the benefit accrue to LMI households based on direct beneficiaries or areas benefited?
- Are the projects consistent with identified unmet needs as a result of Hurricane Isaac?

Due to the relatively small amount of this grant and given the expectation that other resources may be available, the state will not dictate to the parishes an exact percentage of project dollars that must go to housing, economic development, infrastructure or planning. However, if a parish's allocation deviates substantially from demonstrated unmet needs, the state will require additional justification.

Parishes will be offered a menu of CDBG-DR programs to choose from in an effort to streamline implementation. Parishes may alter the designs of these programs with prior approval to adapt to changing needs. Current options include the following:

Housing

- Homeowner Rehabilitation Program
- Buyout program
- Rental Rehabilitation Program

- Minor Roof Repair
- Multi-Family Repair and Reconstruction
- Mitigation Assistance, including Elevation or Relocation
- Tax Credit Programs for Multi-family Construction
- Loan Assistance Programs (including Loan Loss Reserve and down payment assistance options)

Economic Development

- Small Business Grant and Loan program
- Commercial Property Rehab Program
- Economic Revitalization projects

Infrastructure

- FEMA PA Cost Share program
- Project based infrastructure program

An important consideration in the development and finalizing of parish plans is the requirement to serve LMI households. In order for the state to exceed the required 50 percent of program expenditures on LMI households, parish plans will also need to have the necessary provisions to ensure that the 50 percent threshold is met in each parish with a designated allocation. Parish plans will need to include budgets for both total expenditures and expenditures on LMI beneficiaries or LMI eligible activities.

a. St. John the Baptist Parish Program Descriptions

Partial Action Plan No. 4 allocates $19,300,920, as a subset of St. John the Baptist Parish's previously allocated $32,674,000, to the following programs: *Homeowner Rehabilitation Program (HRP), Small Rental Rehabilitation Program (SRRP), Housing Elevation Program, Demolition and Clearance Program and the Homebuyer Assistance Program*. Of this total, Partial Action Plan No. 4 obligates $1,083,398, and Master Action Plan Version No. 3 obligates $8,884,146.99 across the referenced programs. These funding allocations and obligations, in accordance with the parish's unmet needs assessment as outlined in the state's Initial Action Plan approved November 4, 2013, are necessary to address unmet needs in St. John the Baptist Parish in response to Hurricane Isaac.

As documented in the state's Initial Action Plan, St. John the Baptist Parish experienced extensive damages as a result of Hurricane Isaac affecting both the homeowner and rental populations within the parish. These damages represented a high concentration of affected residents spread across a wide geographic area within the parish.

Table 40: St. John the Baptist Parish Demographics and Damage Summary

Location	Census Owner Occ.	Owners w/ Dmg.	% Owner Dmg.	Census Renter Occupied	Renters w/ Dmg.	% Renters Dmg.	Damage Concentration
Edgard	673	297	44%	199	23	12%	37%
Garyville	783	230	29%	222	55	25%	28%
Laplace	8,249	4,386	53%	2,083	1,499	72%	57%
Pleasure Bend	94	30	32%	18	2	11%	29%
Reserve	2,606	839	32%	763	292	38%	34%

Wallace	194	62	32%	40	6	15%	29%
Rest of Parish	38	17	45%	3	4	133%	51%
Total	**12,637**	**5,861**	**46%**	**3,328**	**1,881**	**57%**	**48%**

Source: FEMA Individual Assistance, April 2013

Moreover, this damage was extensive and affected a wide-variety of housing types throughout the parish.

Table 41: Damage Breakdown of Owner-Occupied Households by Type

Type	# Damaged	Ave. RP FVL	Total RP FVL
Condo	24	$ 7,908.69	$ 189,808.50
House	5,077	$ 11,769.95	$ 59,744,246.80
Mobile Home	719	$ 2,453.99	$ 1,764,419.19
Other	2	$ 7,073.53	$ 14,147.05
Townhouse	16	$ 9,410.39	$ 150,566.17
Travel Trailer	23	$ 2,079.36	$ 47,825.25
Total	**5,861**	**$ 10,565.02**	**$ 61,911,012.96**

Source: FEMA Individual Assistance, April 2013

Extensive damages were also recorded affecting the parish's rental population.

Table 42: Levels of Damage for Renter Households

Type	# Damaged
Moderate	939
Substantial	777
Major	160
Destroyed	5
Total	**1,881**

Source: FEMA Individual Assistance, April 2013

However, as a constant, best available data collected after the storm indicated a low- to-moderate income (LMI) population was disproportionately affected across both the owner-occupied and rental communities.

Table 43: Damage Breakdown of Owner-Occupied Households by Income

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
LMI	3,227	$7,899.82	$25,484,827.55	55.06%
Not LMI	2,634	$13,829.23	$36,426,185.41	44.94%
Total	**5,861**	**$10,565.02**	**$61,911,012.96**	**100.00%**

Source: FEMA Individual Assistance, April 2013

Table 44: Levels of Damage for LMI Renter Households

Type	# Damaged
Moderate	803
Substantial	654
Major	129
Destroyed	5
Total	**1,591**

Source: FEMA Individual Assistance, April 2013

As documented in the state's Initial Action Plan, these damages equated to a substantial unmet housing need in St. John the Baptist Parish.

Table 45: Unmet Housing Need Estimate in St. John the Baptist Parish as of April 2013

Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
$281,166,289.25	$(31,155,650.05)	$(47,710,795.95)	$(33,061,539.27)	$(45,239,900.00)	$123,998,403.99

Therefore, it is critical the state utilize its CDBG-DR allocation within St. John the Baptist Parish to address a wide variety of housing needs while paying particular attention to the needs of LMI households.

Table 46: Allocations and Obligations to St. John the Baptist Parish

Program	Allocation	Obligated Previously	Obligation in Master Action Plan Version No. 3	To be Obligated in the Future
Homeowner Rehabilitation Program	$11,549,820	$476,316	$5,664,025.58	$5,409,478.42
Small Rental Rehabilitation Program	$3,594,140	$218,815	$860,527.76	$2,514,797.24
Housing Elevation Program	$2,500,000	$86,483	$1,080,813.39	$1,332,703.61
Demolition and Clearance Program	$350,000	$91,885	-	$258,115
Homebuyer Assistance Program	$1,306,960	$143,628	$1,163,332	0
Admin/TBD	$13,373,080	$121,271	$115,448.26	$13,136,360.74
Total	**$32,674,000**	**$1,138,398**	**$8,884,146.99**	**$22,651,455.01**

i. **Homeowner Rehabilitation Program (HRP)**
Eligible Activity: 105(a)(4)
National Objective: Low- and Moderate-Income Benefit, Urgent Need
Activity Allocation: $11,549,820

The HRP is intended to provide financial assistance to both LMI and non-LMI homeowners to rehabilitate, reconstruct and elevate their Isaac-damaged structures. The program's goals are as follows:

- Promote health and human safety and increase the community's standard of living;
- Provide decent, safe and sanitary housing in disaster-impacted areas;
- Ensure that the housing needs of LMI households are addressed;
- Elevate homes in conjunction with rehabilitation and reconstruction efforts to promote community resiliency and mitigate the need for assistance in future flood events, when required;
- Prevent blight and contribute to overall neighborhood recovery;
- Support positive outcomes for families living in the area at the time of Hurricane Isaac while also redeveloping those areas in a manner enhancing their attractiveness to prospective residents;
- Enhance property values of rehabilitated properties and protect the value of adjacent, non-damaged properties.

ii. Small Rental Rehabilitation Program (SRRP)

Eligible Activity: 105(a)(4)
National Objective: Low- and Moderate-Income Benefit
Activity Allocation: $3,594,140

The SRRP is intended to provide financial assistance to owners of one- to four-unit residential rental properties to rehabilitate, reconstruct and elevate their Isaac-damaged structures. The units rehabilitated through the program will then be subject to income-based rental requirements stipulating they are leased to LMI renters exclusively. The program's goals are as follows:

- Promote health and human safety and increase the community's standard of living;
- Provide decent, safe and sanitary housing in disaster-impacted areas;
- Ensure that the housing needs of LMI households are addressed;
- Elevate units in conjunction with rehabilitation and reconstruction efforts to promote community resiliency and mitigate the need for assistance in future flood events, when required;
- Prevent blight and contribute to overall neighborhood recovery;
- Support positive outcomes for families living in the area at the time of Hurricane Isaac while also redeveloping those areas in a manner enhancing their attractiveness to prospective residents;
- Enhance property values of rehabilitated properties and protect the value of adjacent, non-damaged properties.
- Enhance the stock of available, affordable rental properties.

iii. Housing Elevation Program

Eligible Activity: 105(a)(4)

National Objective: Low- and Moderate-Income Benefit, Urgent Need
Activity Allocation: $2,500,000

The Housing Elevation Program is a stand-alone voluntary elevation program for those homes located in flood-prone areas, and specifically those areas that were inundated by flood waters as a result of Hurricane Isaac. For properties participating in the program, elevations will be to 1 foot above the applicable FEMA-determined base flood elevation.

iv. Demolition and Clearance Program
Eligible Activity: 105(a)(4)
National Objective: Slum and Blight, Urgent Need
Activity Allocation: $350,000

The purpose of the Demolition and Clearance Program is to provide St. John the Baptist Parish with a mechanism to remediate damages in defined neighborhoods, ensure that areas blighted by Hurricane Isaac are redeveloped and/or that adequate additional developments are made available to meet the needs of impacted neighborhoods. At the time of this submission, the parish had identified at least 16 properties blighted by Hurricane Isaac it had targeted for demolition and or clearance. The subject properties have been identified by the St. John the Baptist Parish Planning and Zoning Department as uninhabitable, hazardous or otherwise unsafe storm-damaged structures. They have been declared in imminent danger of collapse and constitute a risk to public health and safety.

v. Homebuyer Assistance Program
Eligible Activity: 105(a)(24)
National Objective: Low- and Moderate-Income Benefit
Activity Allocation: $1,306,960

The Homebuyer Assistance Program will provide homeownership assistance in the form of forgivable, deferred soft second mortgages designed to bridge the gap between the sales price of a home and what an applicant can afford. As the parish's unmet needs illustrated major impacts to both existing homeowners and renters, this program will target those affected populations to facilitate new homeownership opportunities and stimulate the housing market within the affected area. Eligibility will be limited to LMI populations only.

Overview and Delivery

The programs will be administered by the parish, with overview, technical assistance and guidance provided by the state through the Office of Community Development-Disaster Recovery Unit (OCD-DRU) and the Louisiana Housing Corporation (LHC). Through an extensive outreach initiative, the parish will identify eligible households and will coordinate all aspects of administering the programs, including applicant intake, case management and construction work, where applicable.

Program Size

The state allocates $19,300,920 to these housing assistance programs, but reserves the right to revise this allocation at a later date should it be warranted. Additionally, further obligation rounds will be made within each of the programs as warranted via future amendments.

Eligible Applicants

Eligible applicants for the Homeowner Rehabilitation, Small Rental Rehabilitation, Housing Elevation and Homebuyer Assistance programs will be limited to St. John the Baptist residents impacted by Hurricane Isaac who have demonstrable remaining unmet housing needs attributable to this disaster. Eligibility within the Demolition and Clearance Program will be limited to the parish itself, or its designated and properly-procured contractor conducting demolition and clearance activities within the designated Isaac-affected blighted area.

Note that while Partial Action Plan No. 4 provides for service to both LMI and non-LMI populations in the Homeowner Rehabilitation and Housing Elevation programs, LMI populations will be prioritized for assistance. Non-LMI populations will only receive awards after all eligible LMI applicants have received program assistance.

Use of Funds

Delivery of funds will vary by program. For the Homeowner Rehabilitation and Housing Elevation Programs, assistance will be provided in the form of a direct grant agreement between the parish and the applicant and through a construction agreement between the applicant and the selected contractor. In the Small Rental Rehabilitation and Homebuyer Assistance programs, assistance will be provided in the form of forgivable deferred loans. The parish itself will submit requests for direct grant reimbursement for demolition and clearance activities it conducts through the Demolition and Clearance Program.

Monitoring

Monitoring will be performed by the LHC and OCD-DRU staff in accordance with the contracts and the OCD-DRU Monitoring Plan.

b. Plaquemines Parish Program Descriptions

Partial Action Plan No. 3 allocates $12,828,400, as a subset of Plaquemines Parish's previously allocated $16,953,000, to the newly created *Plaquemines Homeowner Assistance Program (PHAP)*. Of this subset, Partial Action Plan No. 3 obligates $800,000, and Master Action Plan Version No. 3 obligates $300,000 to the PHAP. These funding allocations and obligations, in accordance with the parish's unmet needs assessment as outlined in the state's Initial Action Plan approved November 4, 2013, are necessary to address unmet needs in Plaquemines Parish in response to Hurricane Isaac.

As documented in the state's Initial Action Plan, a large number of homeowners in Plaquemines Parish reported damages as a result of Hurricane Isaac. These damages represented a high concentration of homeowners spread across a wide geographic area within the parish.

Table 47: Plaquemines Parish Demographics and Damage Summary

Location	Census Owner Occ.	Owners w/ Dmg.	% Owner Dmg.
Belle Chasse	2,835	361	13%
Boothville	267	188	70%
Buras-Triumph	356	345	97%
Empire	346	271	78%
Port Sulphur	522	450	86%
Venice	60	32	53%
Rest of Parish	1,652	1,133	69%
Total	**6,038**	**2,780**	**46%**

Source: FEMA Individual Assistance, April 2013

Moreover, this damage was extensive, and it disproportionately affected a low-and moderate-income (LMI) population.

Table 48: Damage Breakdown of Owner-Occupied Households by Location

Location	# Damaged	Ave. RP FVL	Total RP FVL
Belle Chasse	361	$1,362.28	$491,783.96
Boothville	188	$2,583.07	$485,618.02
Buras-Triumph	345	$2,544.33	$877,795.04
Empire	271	$2,400.87	$650,636.75
Port Sulphur	450	$2,614.42	$1,176,489.73
Venice	32	$1,414.37	$45,259.99
Rest of Parish	1,133	$23,580.00	$26,716,135.51
Total	**2,780**	**$10,950.98**	**$30,443,719.00**

Source: FEMA Individual Assistance, April 2013

Table 49: Damage Breakdown of Owner-Occupied Households by Income

Type	# Damaged	Ave. RP FVL	Total RP FVL	% Households
LMI	1,699	$8,611.33	$14,630,652.66	61.12%
Not LMI	1,081	$14,628.18	$15,813,066.34	38.88%
Total	**2,780**	**$10,950.98**	**$30,443,719.00**	**100.00%**

Source: FEMA Individual Assistance, April 2013

Finally, and as documented in the state's Initial Action Plan, these damages equated to a substantial unmet housing need in Plaquemines Parish.

Table 50: Unmet Housing Need Estimate in Plaquemines Parish as of April 2013

Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
$126,517,152.01	$(10,029,951.86)	$(15,468,068.38)	$(10,977,921.24)	$(23,736,100.00)	$66,305,110.53

Therefore, it is critical the state utilize its CDBG-DR allocation within Plaquemines Parish to address unmet rehabilitation needs, specifically for LMI households.

Table 51: Round One Obligation and Allocation Changes to Plaquemines Parish Allocation

Program	Allocation	Obligation in Initial Action Plan	Obligation in Partial Action Plan No. 3	Obligation in Master Action Plan Version No. 3	To Be Obligated in the Future
Plaquemines Housing Assistance Program	$12,828,400	$0	$800,000	$300,000	$11,728,400
Admin/TBD	$4,124,600	$29,000	$0	$0	$4,095,600
Total	**$16,953,000**	**$29,000**	**$800,000**	**$300,000**	**$15,824,000**

i. Plaquemines Homeowner Assistance Program

Eligible Activity: 105(a)(4)

National Objective: Low- and Moderate-Income Benefit, Urgent Need

Activity Allocation: $12,828,400

Overview and Delivery

The proposed PHAP will be administered by the parish, with overview, technical assistance and guidance provided by the state through the Office of Community Development-Disaster Recovery Unit (OCD-DRU) and the Louisiana Housing Corporation (LHC). The program will provide funding to assist owner-occupant households that have a gap in financial means due to resource limitations, that are in homes that are in a substandard condition and/or in violation of code requirements, and were damaged by the storm. The PHAP is designed to identify homes in need of repair and/or rehabilitation and provide funding for use in addressing each homeowner's needs. Through an extensive outreach initiative, the parish will identify eligible households with rehabilitation needs and will coordinate all aspects of administering the program, including applicant intake, case management and construction work.

The goals of the program are to:

- Provide decent, safe and sanitary housing in Plaquemines Parish through the provision of minor repair and rehabilitation activities designed to mitigate damage that occurred as a result of this disaster;
- Maintain affordability of homeownership for LMI households; and
- Preserve existing parish property values by eliminating the blight of properties that remain in disrepair.

Program Size

The state will initially allocate $12,828,400 to the PHAP, but reserves the right to revise this allocation at a later date should it be warranted. Additionally, further obligations will be made within the program as warranted via future partial action plans.

Eligible Applicants

Eligible homeowners would be limited to Plaquemines Parish homeowners impacted by Hurricane Isaac who have demonstrable remaining unmet housing needs attributable to this disaster. While the program has been designed to target the needs of LMI households as a priority, the parish reserves the right to address the Urgent Need of non-LMI households should resources remain available, if and only after all program-eligible LMI household needs are met.

Use of Funds

Delivery of funds will be provided in the form of a direct grant agreement between the parish and the applicant and through a construction agreement between the applicant and the selected contractor. The grant agreement will include obligations to: authorize payments directly to the contractor responsible for executing repair work orders; own and occupy their home for not less than one (1) year after the completion of repairs and issuance of a "Certificate of Occupancy"; and, if the damaged home is located within a Special Flood Hazard Area (SFHA), maintenance of flood insurance in perpetuity on the damaged home. For movable housing units, the flood insurance must be maintained at any point that the unit is located in an SFHA.

Monitoring

Monitoring will be performed by the LHC and OCD-DRU staff in accordance with the contracts and the OCD-DRU Monitoring Plan.

2. Allocations to State-Run Programs

The state intends to provide recovery funds to other impacted parishes that were designated IA eligible but did not meet HUD's unmet needs estimate threshold of $10 million. These programs will be developed in consultation with affected parishes and described fully through the partial action plan process. **The total allocation available to state-run programs is $11,432,084.** As with the parish allocations, the 50 percent provision to serve the LMI population will also apply to the total dollar amount of programs run through the state. The funds for state-run programs will be allocated in future Partial Action Plans.

Partial Action Plan #1 and #2 allocated funds to the following:

- Statewide cost-share for FEMA Public Assistance (PA) Category B funds and Transitional Sheltering Assistance (TSA) received in response to Hurricane Isaac;
- Cost-share to Low-to Moderate-Income (LMI) households participating in parish Hazard Mitigation Assistance (HMA) programs in additional impacted parishes;
- Funds to additional impacted parishes to address Hazard Mitigation Grant Program (HMGP) cost-share for drainage projects or marine debris removal, cost-share for PA, or other recovery projects that are Isaac related and in keeping with parish priorities; and
- Homeowner Rehabilitation Program (HRP) to assist LMI, owner-occupied households with minor repair and rehabilitation activities in additional impacted parishes.

Programmatic allocations and the specific obligations were developed in a manner consistent with the state's unmet needs assessment, as outlined in its Initial Action Plan. With remaining funds, the state has proposed via Partial Action Plan No. 1 and 2 the four allocations listed above and described in greater detail below, which meet all grant requirements as outlined by all relevant Federal Registers pertaining to the grant. Specifically, this proposal is mindful of the state's requirement to devote a majority of resources to activities benefiting LMI populations in a manner consistent with its adopted unmet needs in the categories of housing, economic development and infrastructure.

Program Descriptions

a. <u>Statewide Cost-Share for FEMA PA Category B and TSA</u>

Louisiana has suffered five major hurricanes since 2005. The additional cost to the state of its agencies responding to these disasters, combined with declining revenues in an ongoing recession, make the burden of federal cost-share on the state unsustainable. As such, the state has obligated funds to cover the cost-share associated with certain federal funds provided to state agencies.

To determine the state's unmet needs, OCD/DRU has coordinated with the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) to collect relevant data through FEMA's PA and TSA programs. The state documented its highest level of need in Categories A and B for actions taken by state agencies in response to the storm, which are often regarded as short-term actions during and in the immediate aftermath of an event. In Categories C through G, obligations for public infrastructure exceeded $74 million and can be considered a proxy for real property damages. For Hurricane Isaac, state and local governments applying for PA are responsible for a 25 percent cost share; similarly the state is responsible for the 25 percent cost

share associated with TSA. The sum of these needs, as indicated in the chart below, currently exceeds $116 million statewide.

Table 52: FEMA PA Categories

Type	Definition
A	*Debris Removal*
B	*Emergency Protective Measures*
C	*Road Systems and Bridges*
D	*Water Control Facilities*
E	*Public Buildings and Contents*
F	*Public Utilities*
G	*Parks, Recreational and Other Items*

Table 53: Statewide Breakdown of FEMA PA Funding by Category

Category	Total	25% Cost Share
A	$92,336,763.34	$23,084,190.84
B	$252,183,961.44	$63,045,990.36
C	$9,043,931.47	$2,260,982.87
D	$4,049,237.00	$1,012,309.25
E	$74,401,597.48	$18,600,399.37
F	$12,718,801.19	$3,179,700.30
G	$12,811,655.07	$3,202,913.77
TSA	$8,719,091.08	$2,179,772.77
Total	**$466,265,038.07**	**$116,566,259.52**

Source: GOHSEP, July 2013

Due to the heavy rain, flooding and power outages associated with Hurricane Isaac, the state activated plans, procedures, staff and contracts to ensure a comprehensive response for the safe, secure and sanitary evacuation and sheltering of its citizens. The state provided emergency protective measures that were necessary to eliminate and reduce the immediate threat to life, public health and safety, and to reduce the threat of significant damage to improved public and private property.

Additionally, due to the lingering effects of the storm, disaster survivors were unable to return to their homes for an extended period of time and, therefore, had a continuing need for shelter after congregate shelters closed. The state bears a cost-share burden for the initiative that provided short-term lodging for eligible disaster survivors whose communities were either uninhabitable or inaccessible due to disaster-related damages.

Eligible Activity: Section 105(a) (2), (8), (9) and (20)
National Objective: Low to Moderate Income Benefit or Urgent Need
Activity Allocation and Total Obligation: $5,886,000

b. Hazard Mitigation Assistance Cost-Share for LMI Households

Given the limited resources, the state seeks to leverage investment for long-term resiliency and also provide assistance to low- and moderate-income households. In some cases, rehabilitation will be required in conjunction with elevation. In these cases, the state will work with the parish to identify other funding sources for rehabilitation needs. Assuming an average project cost of $120,000, the cost-share amount will be an average of $30,000. Priority will be given to those parishes that are utilizing their Isaac HMGP allocations for household elevations. However, this does not prevent other parishes from requesting cost-share for LMI households; they would just require prior approval. Parishes with Isaac HMGP-funded elevation programs may also submit applicants from their regular Repetitive Loss and Severe and Repetitive Loss (RL/SRL) lists provided they qualify as LMI. The parishes identified with Isaac-funded HMGP elevation programs and their allocations and obligations are as follows:

Table 54: Parish HMA Cost-Share for LMI Households Allocations and Round One Obligations

Parish	Total Allocation	Round One Obligation	To be Obligated in the Future
Tangipahoa	$450,000	$3,000	$447,000
Livingston	$450,000	$156,703.52	$293,296.48
Terrebonne	$300,000	$58,796.25	$241,203.75
Washington	$240,000	$3,000	$237,000
Parishes to be Determined	$1,581,084	$0	$1,581,084
Total	**$3,021,084**	**$221,499.77**	**$2,799,584.23**

Note that the program will be phased in with Partial Action Plans. This will allow the state to gauge the demand for each program and modify its allocations accordingly. If demand does not exist for Hazard Mitigation Assistance LMI cost-share, additional resources would be made available for other HMGP projects designed to protect property from future disasters, rehabilitate projects throughout the impacted area or other priorities identified by the state or local governments.

Hurricane Isaac was a significant flood event, with FEMA-documented flooding of more than 16,800 homes. Of these, 10,800 were owner-occupied, and approximately two-thirds of these (7,187) had major or severe damage. Although 61 percent of the owner-occupied damaged homes carried flood insurance, the additional costs to mitigate through elevation may be cost prohibitive for some homeowners. Even those determined eligible for HMGP will be required to provide a cost share of 25 percent, which would likely mean an additional $20,000 for a typical residential home. The 39 percent that did not carry flood insurance at all will have even greater burdens if the additional costs of mitigation are added to their rebuilding costs.

Per Federal Register Vol. 78, No. 76, HUD has stipulated specific requirements regarding sustainable rebuilding efforts as part of its disaster recovery programs. These requirements include “elevating or flood proofing new construction and substantial improvements to one foot above the base flood elevation” for those projects within special flood hazard areas or

equivalent in FEMA's "most recent and current data source." Recognizing the state's long and well-documented history of flooding, as well as its ongoing efforts to mitigate future flooding in its most vulnerable areas, the state is committed to upholding both the spirit and the letter of these requirements, as illustrated through the abovementioned program proposal.

Eligible Activity: 105(a)(4) and (9)
National Objective: Low and Moderate Income
Activity Allocation: $3,021,084

c. <u>Parish Recovery Priority Projects</u>

These can include, but are not limited to, HMGP cost-share for drainage projects or marine debris removal, PA cost-share or other recovery projects that are Isaac related and in line with parish priorities. Because of the limited amount of resources and the number of IA designated parishes, the parishes must be prioritized by damage level to ensure that a meaningful level of funding is available to the most impacted parishes. Currently, the data source that appears to be the most representative of relative impacts across parishes is the estimate of damages (in dollars) for major and severely damaged homes. These dollar amounts, when considered both in aggregate and per-household, provide the basis for the determination of the most impacted parishes. The top parishes by relative per household damage are Livingston, Tangipahoa, Washington, St. Bernard and St. James. These five parishes also had the highest percentage of flooded homes outside of the five HUD designated parishes. Proposed distribution based on these damages is as follows:

Table 55: Parish Recovery Priority Project Obligations:

Parish	Total Allocation	Round One Obligation	To Obligated in the Future
Livingston	$300,000	$300,000	$0
Tangipahoa	$300,000	$32,373	$267,627
Washington	$200,000	$200,000	$0
St. Bernard	$150,000	$150,000	$0
St. James	$150,000	$150,000	$0
Total	**$1,100,000**	**$832,373**	**$267,627**

Funds not designated for specified projects within a designated time period will be re-allocated to other parishes or other statewide priorities. These projects will promote sustainable, long-term recovery as they will address vulnerabilities to the flood plains.

Eligible Activity: 105(a)(1-24) and Interim Assistance
National Objective: Low and Moderate Income and Urgent Need
Activity Allocation: $1,100,000

d. Homeowner Rehabilitation Program

A large number of Hurricane Isaac-affected homeowners have faced difficulty in securing sufficient resources to fully rebuild their homes, including those in parishes outside of the top five most-impacted that received individual CDBG-DR allocations. In both its initial Action Plan and in Partial Action Plan No. 1, the state identified and recognized substantial unmet housing needs, with 29 parishes reporting damages to owner-occupied households. While most of those instances were located within the top five most-impacted parishes, unmet housing needs in excess of $387 million were identified in the state's more rural parishes.

Table 56: Unmet Housing Need Estimate by Parish, Outside Top 5 Most Impacted

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Allen	$724,531.10	$0.00	$0.00	($42,806.39)	$0.00	$681,724.71
Ascension	$21,326,325.11	($227,312.20)	($624,489.05)	($1,997,277.53)	($798,800.00)	$17,678,446.34
Assumption	$12,227,750.59	($49,910.63)	$0.00	($1,120,141.46)	($302,000.00)	$10,755,698.50
East Baton Rouge	$18,852,976.08	($260,773.25)	($33,032.78)	($2,140,812.95)	($540,100.00)	$15,878,257.10
East Feliciana	$3,440,071.66	($104,750.30)	$0.00	($321,464.11)	($258,200.00)	$2,755,657.25
Iberia	$113,576.83	($5,900.00)	$0.00	$0.00	$0.00	$107,676.83
Iberville	$10,658,671.50	($30,310.37)	($95,093.85)	($1,024,313.36)	($136,300.00)	$9,372,653.93
Jefferson Davis	$42,228.94	$0.00	$0.00	$0.00	$0.00	$42,228.94
Lafayette	$2,944.98	$0.00	($37,322.69)	$0.00	$0.00	($34,377.71)
Lafourche	$42,119,616.65	($360,417.34)	($300,245.65)	($4,209,831.41)	($1,837,600.00)	$35,411,522.25
Livingston	$66,870,605.42	($1,429,157.26)	($4,116,310.83)	($8,132,904.77)	($2,727,500.00)	$50,464,732.56
Morehouse	$695,376.74	($6,164.70)	$0.00	($30,754.76)	$0.00	$658,457.28
Ouachita	$0.00	$0.00	($4,226.64)	$0.00	$0.00	($4,226.64)
Pointe Coupee	$1,492,381.88	($7,622.35)	$0.00	($68,851.55)	($8,600.00)	$1,407,307.98
Rapides	$0.00	$0.00	($22,381.82)	$0.00	$0.00	($22,381.82)
St. Bernard	$39,970,140.84	($983,291.15)	($673,914.38)	($2,751,318.39)	($4,102,500.00)	$31,459,116.92
St. Charles	$28,260,806.61	($510,228.49)	($143,699.59)	($2,583,196.57)	($2,373,700.00)	$22,649,981.96
St. Helena	$10,270,904.28	($46,704.98)	$0.00	($819,728.00)	($214,900.00)	$9,189,571.30
St. James	$20,616,539.05	($442,219.07)	($174,050.31)	($1,619,722.87)	($998,300.00)	$17,382,246.80
St. Martin	$3,913,914.12	($14,373.30)	$0.00	($275,930.53)	($9,600.00)	$3,614,010.29
St. Mary	$25,546,726.08	($61,604.07)	$0.00	($2,404,258.05)	($247,300.00)	$22,833,563.96
Tangipahoa	$92,665,579.05	($1,352,457.66)	($1,969,407.81)	($11,858,013.90)	($3,456,800.00)	$74,028,899.68
Terrebonne	$39,614,876.57	($403,868.29)	($71,737.00)	($3,672,068.45)	($833,500.00)	$34,633,702.83
Vernon	$0.00	$0.00	($1,991.91)	$0.00	$0.00	($1,991.91)
Washington	$25,406,549.19	($512,169.34)	($386,888.83)	($2,564,618.08)	($501,500.00)	$21,441,372.94
West Baton Rouge	$3,962,543.74	($31,332.47)	($6,533.60)	($328,479.02)	($100,800.00)	$3,495,398.65
West Feliciana	$1,545,717.68	($15,795.49)	$0.00	($122,065.39)	$0.00	$1,407,856.80
Total	**$470,341,354.70**	**($6,856,362.71)**	**($8,661,326.73)**	**($48,088,557.54)**	**($19,448,000.00)**	**$387,287,107.73**

In its Partial Action Plan No. 1, the state further defined the need for housing rehabilitation, pledging "to identify other funding sources for rehabilitation needs." In the time since the submission of Louisiana's Partial Action Plan No. 1, the state has worked with Catholic Charities Archdiocese of New Orleans (CCANO), the Isaac Disaster Case Management Program (DCMP) vendor, to identify such resources from other public, private and nonprofit sources. However, such alternative funding sources have been exhausted, and through its active pipeline of

households receiving disaster case management services, CCANO has been able to illustrate the most current unmet rehabilitation needs for which resources have not been identified.

Table 57: Isaac DCMP Unmet Repair Needs By Parish as of July 2014

Parish	LMI Household Count	LMI Unmet Repair/Rebuild Cost *	Total Household Count	Total Unmet Repair/Rebuild Cost **
CCANO ***	**24**	**$251,421.29**	**26**	**$253,068.63**
St. Bernard	13	$38,104.73	15	$39,752.07
St. Charles	2	$11,331.94	2	$11,331.94
St. James	9	$201,984.62	9	$201,984.62
CCBR	**210**	**$1,243,207.54**	**220**	**$1,274,991.53**
Allen	16	$147,000.00	21	$170,000.00
Ascension	11	$70,185.34	11	$70,185.34
Assumption	1	$2,000.00	1	$2,000.00
East Baton Rouge	8	$30,863.70	9	$31,878.19
East Feliciana	4	$11,293.77	4	$11,293.77
Iberville	21	$114,294.81	21	$114,294.81
Livingston	26	$200,767.40	26	$200,767.40
Pointe Coupee	2	$27,354.00	2	$27,354.00
St. Helena	13	$55,411.13	14	$57,639.25
St. Martin	4	$26,497.49	4	$26,497.49
Tangipahoa	103	$548,627.90	106	$554,169.28
West Feliciana	1	$8,912.00	1	$8,912.00
LSSDR	**33**	**$151,397.36**	**37**	**$198,397.36**
Washington	33	$151,397.36	37	$198,397.36
TRAC	**155**	**$1,432,383.39**	**164**	**$1,497,383.39**
Lafourche	38	$376,833.39	38	$376,833.39
St. Mary	22	$166,000.00	23	$168,000.00
Terrebonne	95	$889,550.00	103	$952,550.00
Total	**422**	**$3,078,409.58**	**447**	**$3,223,840.91**

Source: DCMP Management Team, CCANO Lead, July 2014

* According to HUD 2014 parish ELIL, VLIL, LIL guidelines.

** Including all unmet repair needs with damage assessments of destroyed, major, or minor.

*** Agencies: CCANO=Catholic Charities Archdiocese of New Orleans; CCBR=Catholic Charities Baton Rouge; LSSDR=Lutheran Social Services Disaster Response; TRAC=Terrebonne Readiness and Assistance Coalition.

Therefore, per Partial Action No. 2, it is critical the state utilize CDBG-DR funds to address remaining unmet rehabilitation needs, specifically for low- and moderate-income (LMI) households, while still maintaining its commitment articulated in Partial Action Plan No. 1 to prioritize sustainable hazard mitigation assistance. With the allocation of $1,425,000 to the HRP, the state believes both goals will be accomplished, but does reserve the right to further divert resources as the state's Isaac recovery efforts, and priorities, continue to evolve over time.

Eligible Activity: 105(a)(4)
National Objective: Low- and Moderate-Income Benefit
Activity Allocation: $1,425,000
Round One Obligation: $712,500

Overview and Delivery

The HRP will be administered through the Louisiana Housing Corporation (LHC) as an Isaac-specific part of the Nonprofit Rebuilding Pilot Program funded through a CDBG-DR award to address recovery from hurricanes Katrina and Rita. The program will provide funding to assist LMI households that have a gap in financial means due to resource limitations, for homes that are in a substandard condition and/or in violation of code requirements. The program will utilize CDBG-DR funds and will be limited to parishes impacted by Hurricane Isaac that did not receive direct allocations of CDBG-DR funds. These parishes are **Allen, Ascension, Assumption, East Baton Rouge, East Feliciana, Iberville, Lafourche, Livingston, Morehouse, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. Martin, St. Mary, Tangipahoa, Terrebonne, Washington, West Baton Rouge and West Feliciana**. The HRP is designed to identify homes in need of repair and/or rehabilitation and provide funding for use in addressing those needs. Through a Notice of Funding Availability (NOFA), the LHC will select experienced partners such as nonprofit organizations, units of local government (ULG) (i.e. sub-recipients) and other organizations to carry out all phases of housing rehabilitation, including applicant intake, case management and construction work.

The goals of the program are to:

- Provide decent, safe and sanitary housing in Hurricane Isaac-impacted parishes, as outlined above, through the provision of minor repair and rehabilitation activities designed to mitigate damage that occurred as a result of this disaster;
- Prioritize assistance for LMI households; and
- Prioritize the provision of decent, safe and sanitary housing for elderly and disabled populations.

C. Method of Distribution

1. General Description

For the direct parish allocations, the state utilized the same methodology used by HUD for state distribution to the individual parishes, as illustrated in Section II of this document. OCD/DRU encourages parishes to develop programs that benefit those most impacted and in greatest need within their communities. Five percent of the funds will be used for administration of the grant. This includes the state and parishes' allocation towards grants management and technical assistance. These percentages only apply to the state's plan for how money will be set aside for the various recovery areas. Additionally, at least 50 percent of the funds must benefit LMI households.

2. Method of Distribution Process

a. Distribution to Parishes

The state will operate a grants management protocol in order to deliver resources to the eligible parishes. The process for parishes to apply will be as follows:

- The state will develop program criteria, basic guidelines and CDBG-DR requirements for a slate of different programs that may include housing, infrastructure, economic recovery and mitigation measures.
- Each parish, as a subrecipient, will be required to develop a recovery proposal for submittal to the state. Parishes will be required to follow a Citizen Participation Plan as required by the state.

- The state will fund projects out of the parish allocation as Partial Action Plans are approved.
- Unused funds in the parish programs may be re-allocated as appropriate through Action Plan Amendments.
- Parishes will be able to use allocated funds to hire grant administrative staff and/or consultants.
- The goal is to provide the greatest possible autonomy and flexibility to parishes.

b. State-Run Programs

The state developed program criteria, basic guidelines and CDBG-DR requirements for a slate of different programs that include housing, infrastructure and mitigation measures, which are described above in Section B.

3. Deadlines and Process to Ensure Timely Expenditure of Funds

In order to ensure expenditure of funds within the required two-year period, the State of Louisiana will implement strict guidelines internally at the state level, and within all agreements with subrecipients. The state anticipates executing agreements or amendments to agreements immediately following HUD approval of Action Plans or Partial Action Plans obligating funds. In addition, OCD/DRU will provide technical assistance and support to all subrecipients as needed so that all necessary deadlines are met and funds are expended within all deadlines. Failure to meet any of these requirements may result in reallocation of funds to other entities.

Per Federal Register Vol. 78, No. 76, HUD has stipulated that grantees submit a projection of expenditures and outcomes to ensure funds are expended in a timely manner and to track proposed versus actual performance. OCD/DRU will publish these reports on its website on a quarterly basis. The current report can be found at http://www.doa.louisiana.gov/cdbg/DR/IC_ActionPlans.htm.

D. Leveraging Funds

1. Overview

In order 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, including FEMA and the SBA. Existing state resources and other funds from the disaster appropriation will also be examined in an effort to ensure that all available funding is utilized where it is most needed.

2. Housing

In an effort to have the greatest impact possible, the state will rely on best practices and experience learned from prior disasters. Additionally, it will be critical to implement a creative approach to utilizing the available funding. To that end, the state is working with its partners to identify disaster and non-disaster federal, state, private and nonprofit funding sources that are available to assist residents in their recovery efforts. Concurrently, the state will take a comprehensive approach when examining how best to assist households with unmet needs. This inclusive strategy will examine what funding sources are available and how those sources can be combined to create a holistic solution to the issues facing residents and communities.

The state has developed a Housing Resource Guide that will compliment this effort. The guide lists federal, state, nonprofit and other organizations that have funding available to assist impacted communities in their Hurricane Isaac recovery efforts. In addition, the guide provides information on specific programs, application criteria, population(s) served and other details that serve to focus an individual or organization on resources relevant to a specific need.

3. Economic Development

The state will combine funding to address economic development unmet needs from other federal funding sources such as non-disaster CDBG funding, the U.S. Department of Agriculture (USDA), FEMA PA 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.

4. Infrastructure

The state will combine funding to address infrastructure unmet needs from other federal funding sources such as non-disaster CDBG funding, USDA, FEMA PA and FEMA Hazard Mitigation Grant Program. Additional non-federal resources such as local and state public funds will provide further leverage to these disaster recovery funds. OCD/DRU has experience in leveraging other funding sources from previous disasters managed by the agency: recovery efforts from hurricanes Katrina and Rita in 2005 and Gustav and Ike in 2008 include several projects that have funding from other sources to address unmet needs. For example, FEMA Hazard Mitigation Grant Program funds are being used to address hardening of several public buildings in which the subrecipient has committed CDBG-DR funds to the project to address the requirement of local funds match to ensure that the need is addressed.

5. Other Sources of Funds

As part of the state's ongoing recovery efforts, OCD/DRU has leveraged CDBG-DR funds with the following sources of funds:

- Low-Income Housing Tax Credit Programs;
- HOME Program;
- Medicaid Funded Provision of Medical Services;
- FEMA PA;
- New Market Tax Credit Programs;
- Historic Tax Credit Programs;
- Live Performance Tax Credits Programs;
- HUD 242 Loan Program;
- Private Resources (Developers/Non-Profit Organizations); and
- State Capital Outlay Program.

III. Planning and Coordination

The State of Louisiana has historically had to address coastal erosion, subsidence and wetland erosion with a significant portion of the southern half of the state below sea level, and of course the constant threat of tropical storms and hurricanes. Since the flooding and damage associated with hurricanes Katrina and Rita in 2005, followed by hurricanes Gustav and Ike in 2008, the state has been proactive in putting into place measures that would address resiliency and sustainability, as well as educate the public so that risk for communities and individuals could be minimized. Louisiana articulated its vision to rebuild "Safer, Stronger and Smarter" as the guide for recovery was translated into the following actions:

- Oversight for ensuring impacted parishes developed Long Term Recovery Plans as required under FEMA's ESF-14 in 2006;

- State adoption of the National Building Code Standards in 2006;

- Proactively ensuring parish adoption of the Advisory Base Flood Elevations (ABFEs) with concurrent adjustments in permits issued for new construction and height or elevation requirements issued after the respective adoptions;

- Funding of "Louisiana Speaks" – a major regional initiative for all of south Louisiana reflecting visions and strategies for resiliency and sustainable growth practices (May 2007). More than 27,000 citizens, a historical first in the United States, participated in developing the plan. The 94-page document in hardcopy and disc and two subsequent publications: "Louisiana Speaks: Planning Toolkit" and "Louisiana Speaks: Pattern Book" were widely distributed to planners, government entities, local nonprofits and associations and citizens;

- The Coastal Protection Restoration Authority (CPRA) was funded by the Louisiana Legislature to develop a Master Plan (and unanimously approved by the Louisiana Legislature on May 22, 2012) with specific projects within each parish designed for protection of the coast and communities.

Because OCD/DRU has administered CDBG-DR disaster recovery funds since 2006, mechanisms are already in place to serve as guidelines for not only CDBG compliance, but also comprehensive planning and prioritization of projects for the short-term and long-term recovery of communities. These mechanisms include:

- The state's template for the development of a disaster recovery proposal to utilize CDBG-DR funds at the parish level is being adapted to incorporate assurances that Isaac projects will reflect "unmet needs" as established in the state's Action Plan, as well as take into consideration and reflect:

    i. The Isaac Parish Recovery Strategy emanating from the NDRF;
    ii. Local ABFEs and Flood Insurance Rate Maps (FIRMs);
    iii. The parish Hazard Mitigation Plan required by GOSHEP;
    iv. The parish's Long Term Recovery Plan (ESF-14);
    v. An assessment of local land use plans, zoning and floodplain management ordinances permit requirements;
    vi. The Master Plan of the CPRA (if applicable); and
    vii. Regional coordination with the respective regional planning commission.

  This will enable Isaac CDBG-DR funds to be leveraged with other funding sources and already identified priorities for sustainability and resiliency;

- OCD/DRU's project-specific applications require the identification of the mitigation being accomplished by the project, with that mitigation subsequently reflected in the plans and specifications developed by architects and engineers. Approval and authorization for the use of funds require independent review approvals by OCD/DRU, including environmental reviews and Department of Transportation and Development (DOTD) approval on plans and specifications affecting the state's Floodplain Management Program;

- The state has guidelines on elevation and costs for specific types of housing and encourages coordination of CDBG-DR funding with FEMA's Hazard Mitigation Grant Program;

- The Louisiana Housing Corporation has the responsibility to implement state-run housing programs, including disaster recovery projects. Guidelines on elevation costs will be made available, as well as "best practices" on educational outreach programs and floodplain management principles. The template for the development of affordable housing includes guidelines and evaluation criteria on sustainable development, which include Green Construction and Energy Standards; and

- The Pilot Comprehensive Resiliency Program, implemented in 2010 under funding from hurricanes Gustav and Ike, is a proactive program to develop and facilitate local planning that incorporates sustainability and resiliency into land use plans, zoning and floodplain management. The program funds were made available to local governments and non-profit entities in parishes impacted by hurricanes Gustav and Ike through a competitive application process. Twenty-nine communities have been awarded grants through the competitive program. These projects include water management, floodplain ordinances, comprehensive plans, zoning codes and a plan for wetland carbon. In addition, 17 building code inspectors are being funded for a two-year period in 10 communities to assist with enforcement and adaptation of permit policies and fees to allow for those communities to ultimately sustain the effort to manage growth, compliance and blight.

The education component of the Resiliency Program, through a joint venture with the Louisiana State University (LSU) Coastal Sustainable Studio, has established a permanent online library, reflecting the plans developed through the Resiliency Program, criteria for determining sustainability and resiliency at the local level and educational tools. The OCD/DRU and LSU initiative includes a series of statewide webinars and workshops that provide national perspectives through recognized experts and local tools and strategies for implementation. Topics to date have included: "Gaining Economic Advantage through Environmental and Hazard Mitigation", "Social Resilience: Bridging Planning and Communication through Technology" and "Retrofitting for Resiliency". The Forum, "NFIP: Preparing for Changes to Flood Insurance" that was held June 17, 2013 was designed to help parishes and municipalities develop community-scale strategies that reduce flood risk and increase their scores on the Community Rating System. All webinars and workshops are available on the Louisiana Resiliency Assistance Program website at http://resiliency.lsu.edu/. Outreach for these sessions are statewide to elected officials, disaster recovery subrecipients, floodplain managers, planners, etc. Distribution is both by LSU, OCD/DRU and through partners such as the Louisiana Municipal Association, the Louisiana Chapter of the American Planning Association, the Floodplain Management Association and others.

Louisiana has been fortunate to have been selected as the first site for implementation of the National Disaster Recovery Framework (NDRF). Through that initiative, OCD/DRU and GOSHEP have worked extensively to support this effort by providing staff and guidance throughout St. John Parish and Plaquemines Parish's recovery efforts, including case management efforts immediately after the storm and the months that the local Citizens Advisory Committees (CACs) intensely worked through community meetings and open houses to develop their Isaac Recovery Strategies.

- The St. John the Baptist Parish Isaac Recovery Strategy was adopted May 14, 2013, and the Plaquemines Parish Isaac Recovery strategy was adopted June 25, 2013. Both were unanimously adopted by their respective Parish Councils.

- Numerous meetings between the executive staff of OCD/DRU and St. John and Plaquemines parish officials have been held almost on a weekly basis to discuss Isaac regulations, resources, planning coordination, proposal development and local issues and impediments. Meetings were also held the week of July 22, 2013 with Tangipahoa and Livingston parishes. Parishes receiving direct entitlement funding for Isaac – Orleans, St. Tammany and Jefferson – have also been provided technical assistance by OCD/DRU and through HUD's technical assistance contract with Enterprise Community Partners.

- St. John Parish's Comprehensive Plan for Land Use and Zoning, which was 50 percent complete at the time Hurricane Isaac hit Louisiana, is being revamped to incorporate new data on storm surge and environmental vulnerability, as well as the CAC's Isaac Recovery Plan.

- FEMA's Region VI Office/Hazard Mitigation Office and the GOSHEP's Hazard Mitigation Office have approved the first "pilot" for updating the parish's Hazard Mitigation Plan and incorporating it into the current initiative for the Comprehensive Plan for Land Use and Zoning.

- Plaquemines Parish, in particular, faces challenges due to its repetitive flood zones reflected in the ABFEs, communities built outside its levee system, storm surge issues, subsidence and wetland erosion and limited resources divided between very small rural enclaves and a population shift to higher ground in Belle Chasse.

- OCD/DRU is a member of GOSHEP's Hazard Mitigation Advisory Council, which was appointed to provide input into the update and revision of the State's Hazard Mitigation Plan required by FEMA. This will provide a direct conduit for the exchange of data, information and updates with Isaac impacted communities and facilitate targeted actions that reflect more directly resiliency, sustainability and mitigation criteria in their Parish Hazard Mitigation Plans.

- The Louisiana Disaster Housing Task Force received a technical assistance grant through HUD's OneCPD program. Under that grant, the Enterprise Community Partners has worked with the Task Force to develop program structures and models.

Training for Isaac Subrecipients on Sustainable & Coordinated Planning

OCD/DRU has traditionally provided statewide training to disaster recovery subrecipients and will continue that specifically for Isaac subrecipients. Attendance is considered mandatory.

While technical assistance to Isaac-impacted parishes has already begun, throughout August and September 2013 OCD/DRU provided individual guidance to the parishes in preparing their proposals, which were due to OCD/DRU on November 1, 2013, that prioritized and identified recovery projects. On September 23, 2013, OCD/DRU conducted a Hurricane Isaac workshop addressing both Hurricane Isaac regulations and CDBG compliance in implementing projects, complying with implementation schedules in the state's performance monitoring templates and the state's obligation of HUD Hurricane Isaac funding and "best practices" on resiliency, sustainability and mitigation to identify "standards" for recovery. On January 17, 2014 OCD/DRU conducted a Hurricane Isaac workshop for parishes identified to participate in its Hazard Mitigation Assistance Cost-Share for LMI Households and Parish Recovery Priority Projects programs.

For further technical assistance, partners will include but not be limited to the Coastal Restoration Authority, Regional Planning Commission, LSU Coastal Sustainability Studio, OCD/DRU Resiliency Program, State Building Trade Association and GOHSEP.

OCD/DRU has an established outreach system to disaster recovery subrecipients that will be continued under Isaac. Each parish will have an outreach representative assigned to the parish who troubleshoots issues, coordinate meetings with OCD/DRU personnel, tracks project implementation schedules, reviews records retention requirements and assists with other issues as they may be identified.

IV. Citizen Participation

A. Citizen Participation Plan

The State of Louisiana developed a specific Citizen Participation Plan for disaster recovery from Hurricane Isaac. The plan includes citizen participation requirements both for the state and also the parishes or other entities that will implement activities under this grant *(see Attachment F: Citizen Participation Plan)*.

Citizens and other stakeholders will be given an opportunity for reasonable and timely access to information and a period for submitting comments relating to this Disaster Recovery Action Plan and any ensuing substantial amendments.

The state is committed to providing access to the Action Plan and programs detailed within to all its citizens. These efforts include special consideration for those with limited English proficiency (LEP) and persons with disabilities. The Action Plan and substantial amendments will be translated into Spanish and Vietnamese to reach the LEP population in the impacted areas. Citizens with disabilities or those who need technical assistance can contact the OCD/DRU office for assistance, either via:

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

The OCD/DRU website will contain direct links to the Action Plan, amendments, reports and recovery programs. It will be consistently updated to provide the latest available information.

1. Citizen Input

The state has been in ongoing communications with its residents, local government leaders, state legislators and other stakeholders since Hurricane Isaac made landfall. This continuous outreach has helped identify the needs and priorities of the impacted communities and informs the programs set forth in this Action Plan.

OCD/DRU personnel have provided ongoing support within St. John the Baptist and Plaquemines parishes since the storm. State officials have held frequent calls and meetings with these and other impacted communities to discuss, among other things, the storm's effects on the local housing stock, infrastructure and business communities.

2. Louisiana Disaster Housing Task Force

As the arrival of Hurricane Isaac was imminent, the Louisiana Disaster Housing Task Force (Task Force) was activated. The Task Force includes: state personnel from OCD/DRU, GOHSEP, the LHC

and the state Department of Children and Family Services (DCFS); representatives from HUD and FEMA; and members from the local Voluntary Organizations Active in Disaster.

The Task Force has played an essential role in maintaining contact with the leaders of the impacted parishes, assessing needs on the local level and providing data as needed.

The state's outreach efforts will continue throughout the duration of the program planning and recovery process, in accordance with the Citizen Participation Plan.

B. Citizen Complaints

The state and its subrecipients have established procedures for responding to citizens' complaints regarding activities carried out utilizing these CDBG-DR funds. The full details are provided in the Citizen Participation Plan. Citizens will be provided with an appropriate address, telephone number and times during which they may submit such complaints. The state and subrecipients will provide a written response to each complaint within 15 days of receiving a complaint, as practicable.

C. Receipt of Comments

This Action Plan was posted for public comment on Friday, August 16 through Friday, August 23, 2013. The plan was posted online in English, Spanish and Vietnamese. Public notices were published in eight newspapers, including The Advocate, the state's journal of record, and a press release was also distributed.

Comments were accepted via mail, facsimile, email and the OCD-DRU website. Four comments were received during the public comment period. A summary of those comments and the state's responses can be found in Attachment G.

D. Amendments to the Disaster Recovery Action Plan

1. Substantial Amendments

The state defines substantial amendments to the Action Plan as those that propose one or more of the following changes to the initial plan:

- A change in the purpose, scope, location or beneficiaries of an activity;
- The allocation or re-allocation of more than $1 million; or
- The addition or deletion of any allowable activity described in the approved plan.

Only those amendments which meet the definition of a substantial amendment are subject to the citizen participation process. Substantial amendments are defined as those which eliminate or add a program category or activity, exclude a previously defined geographical area or involve a change of more than 15 percent of the allocation of funds in any one program category or activity.

2. Submittal of Amendments

A substantial amendment to the Action Plan will follow the same procedures for publication as the original Action Plan in accordance with the Citizen Participation Plan. All amendments, both substantial and non-substantial, will be posted on the OCD/DRU website in sequential order after HUD has given final approval. Partial Action Plans and Action Plan Amendments will also be incorporated into the Original Action Plan.

V. Other Criteria

A. Protection of People and Property; Construction Methods

The State of Louisiana intends to promote high quality, durable and energy efficient construction methods in Isaac affected parishes. 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.

All new construction of residential buildings or replacement and/or reconstruction of substantially damaged buildings must incorporate Green Building Standards, and rehabilitation of non-substantially damaged residential buildings must follow guidelines in the HUD CPD Green Building Retrofit Checklist. Any construction subject to the Green Building Standards must meet an industry-recognized standard and achieve certification under at least one of the following programs:

- ENERGYSTAR;
- Enterprise Green Communities;
- LEED;
- ICC-700 National Building Standard; and
- Any other equivalent comprehensive green building program approved by OCD/DRU.

All state-administered programs may use a third party inspection service to ensure that Green Building Standards are met using standardized checklists developed from the above listed programs. Parishes administering construction programs will receive training on Green Building Standards and be provided standardized checklists. Parish compliance with Green Building Requirements will be memorialized in their grant agreement and monitored by OCD/DRU's or designated third party contractor.

B. Public Housing, HUD-Assisted Housing and Housing for the Homeless

Details on the state's plans to identify and address the needs of Public Housing, HUD assisted housing, and Housing for the Homeless can be found in section B.1.b of the Impact and Unmet Needs Assessment.

While there were no McKinney-Vento-funded shelters and housing for the homeless destroyed by Hurricane Isaac, individuals and families experiencing homelessness sought out refuge in evacuation shelters set up after the storm. How the state intends to address the needs of these individuals is addressed in the section below.

C. Disaster-Resistant Housing

The state, through the Louisiana Housing Corporation (LHC), has existing programs that provide homeless prevention and rapid re-housing assistance to individuals and families at risk of homelessness and individuals and families experiencing homelessness. The state will continue to provide these services, focusing additional resources as appropriate to solve storm-related issues. Additionally, the state will work with the local Continuum of Care organizations to identify existing transitional and permanent housing programs that can be used to assist impacted individuals and families.

Immediately after Hurricane Isaac, LHC created a HOME Tenant-Based Rental Assistance program to serve low-income individuals and families with children, especially those with incomes below 30 percent

of the AMI. There is a preference for households with disabled or elderly family members or households experiencing homelessness.

The state has an existing permanent supportive housing program for people with severe disabilities experiencing homelessness or at risk of homelessness; the program provides both supportive housing services and rental assistance. The state will seek to increase the program where necessary to provide stable, permanent housing and supportive services to the severely disabled.

The state will incorporate strategies to provide disaster resilient housing to all households – regardless of race, ethnicity or income level. Through experience gained in recovering from previous disasters, the state has a clear focus on assisting all residents in returning to homes that are better prepared to weather future disasters. While in the planning stages, the state will consider how requirements related to flood-proofing, wind-resistance and other mitigation efforts associated with the receipt of recovery funding will impact households of various racial, ethnic and low-income concentrations. There will be a concerted effort to provide all individuals with the information needed to make the best decisions possible regarding their recovery process.

In addition, the state will work with its partners on the local level to determine the current availability of affordable housing and, as appropriate, where there are opportunities to increase the affordable housing stock. As was made clear in many areas following Hurricane Isaac, there is a real need for affordable housing both immediately following a disaster and throughout the recovery continuum. This need was uncovered in areas that had not previously experienced a large scale housing shortage, and it only served to further highlight the necessity of creating affordable housing opportunities statewide. In response, the state is committed to working with its partners to ensure that the need for affordable housing is a major component of the long-term recovery strategies developed and implemented at the local level.

D. Minimize or Address Displacement

The State of Louisiana will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all subrecipients administer their programs 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 and the implementing regulations at 24 CFR Part 570.496(a). All subrecipients will be required to demonstrate that they have adopted policies and procedures to minimize displacement in accordance with these regulations and will be monitored by the state to ensure compliance with both the URA and 104(d). In addition, Parishes will be encouraged to adopt Optional Relocation Policies for voluntary housing programs that may result in the temporary displacement of owners or tenants.

E. Program Income

The state understands that when implementing certain activities with CDBG-DR funds, there is potential for generating program income. Prior to implementing these activities, the state will develop and adopt hurricane Isaac program income policies and procedures. All program income generated by CDBG-DR funds under the hurricane Isaac disaster will be returned to OCD/DRU and will follow these policies and procedures. Program Income will continue to be spent on projects which further recovery in parishes impacted by Hurricane Isaac. These funds will continue to be considered Disaster Recovery funds and will be subject to all standard CDBG regulations. Any program income generated will be governed by the program income guidance provided in the regulations at 24CFR570.489(e) and 24CFR85.25 and all applicable waivers.

F. Monitoring Standards and Procedures

OCD/DRU will use its Monitoring Process and Procedures currently being used to monitor Katrina/Rita and Gustav/Ike CDBG-DR programs and projects. This is a systems-based process that uses three levels of risk analysis to determine what projects or programs should be reviewed on-site to determine if jurisdictions and subrecipients are administering their programs and projects in a manner to assure compliance with all applicable CDBG-DR rules and regulations. Monitoring schedules are published and tracked on a quarterly basis. For jurisdictions and subrecipients with only one or two projects, the systems approach is modified to accommodate the monitoring of each project. For Isaac CDBG-DR funds, this same methodology will be employed for on-site monitoring but, based on the number and types of activities funded, may be tweaked for risk analysis.

For each subrecipient, the OCD/DRU provides monitoring guidance in Chapter 12 of the Grantee Administrative Manual, which can be found at: http://doa.louisiana.gov/cdbg/DR/manual/ver3-4/Section-12-Version-3-4.pdf. This section of the manual provides an overview of the OCD/DRU monitoring process and strategy, and provides guidance and checklists for subrecipients to develop their own monitoring process. When subrecipients are monitored by the OCD/DRU, part of the monitoring focuses on their process and its implementation.

G. Procedures to Detect and Prevent Fraud, Abuse and Mismanagement

In order to minimize fraud, waste, and abuse in CDBG-DR programs, the state will require each subrecipient to demonstrate that they have procedures and/or systems in place to identify and report potential fraud, waste and abuse in their CDBG-DR program(s) prior to the release of funds. If suspected fraud is identified, subrecipients will be required to immediately report the information to the OCD/DRU executive director. The state will in turn refer the matter to the HUD Office of Inspector General (HUD OIG) and other law enforcement agencies where appropriate.

In concert with the HUD OIG and other law enforcement agencies, the state will take appropriate measures to address such allegations as the circumstances dictate. In accordance with Louisiana Revised Statute 24:523, in the event that the state has actual knowledge of a misappropriation of funds or assets, the matter will additionally be referred to the applicable office of district attorney and the Louisiana Legislative Auditor, if not already notified. In addition, the state will conduct regular monitoring of subrecipients and will report any potential fraud, waste and abuse to these same agencies.

Conflict of Interest statements are included in all grant agreements or Cooperative Endeavor Agreements, which state that no person who exercises or has exercised any functions or responsibilities with CDBG-DR activities shall obtain a financial interest of benefit from any CDBG-DR project or program. The state will only consider an exception to these provisions after the subrecipient has: 1) disclosed the full nature of the conflict and submitted documentation that the disclosure has been made public and 2) provided a legal opinion stating that there is no violation of state or local law if the exception is granted.

H. Capacity

OCD/DRU was created to administer CDBG-DR funds after hurricanes Katrina and Rita. The Louisiana Recovery Authority acted as the policy making arm for the state until the agency sunset in 2010; at that time, the LRA's work was folded into OCD/DRU. OCD/DRU is presently responsible for administering nearly $14.5 billion in CDBG-DR funds, related to recoveries from hurricanes Katrina, Rita, Gustav and Ike. OCD/DRU has the established policies, procedures, systems and personnel to continue leading long-term recovery efforts related to Hurricane Isaac. The agency will assess the need for additional staff to ensure effective administration of Isaac grants.

OCD/DRU will also continue to provide technical assistance and training to those subrecipients responsible for administering and implementing CDBG-DR programs and projects. All parish subrecipients under the Isaac disaster allocation have received CDBG-DR allocations under previous storms impacting Louisiana, which translates to some familiarity with the federal rules and regulations associated with the funds. OCD/DRU will continue using its numerous outreach and communication efforts to provide direct technical assistance and training to subrecipients to ensure timely, compliant and effective use of funds. These outreach efforts include: designated OCD/DRU Outreach personnel meetings with local officials, hosting regional coordination meetings, sending mass communication messages via an online grant system, utilizing performance monitoring trackers to keep projects held to deadlines and deliverable dates and conducting compliance and monitoring visits. OCD/DRU will also work with local governments on guidance needed related to administrative needs. All of these efforts are designed to increase the capacity of subrecipients to ensure the appropriate, compliant use of funds.

Additionally, OCD/DRU will continue using its "Disaster CDBG Grantee Administrative Manual," which provides direction to subrecipients regarding the general requirements included in all Cooperative Endeavor Agreements (CEAs) that apply to parishes and units of local government, as a guide in implementing recovery programs. OCD/DRU will also continue to utilize its established online grant system for the efficient processing of applications and payment requests. Again, all parish subrecipients under the Isaac disaster are familiar with the online grant system.

OCD/DRU acknowledges that it remains legally and financially accountable for the use of all CDBG-DR funds appropriated to the State of Louisiana for Hurricane Isaac. Our agency is committed to appropriate management and oversight of these funds.

I. Certification of Controls, Processes and Procedures

As directed by Federal Register Vol. 78, No. 103, the State of Louisiana, Division of Administration certified and submitted to HUD on July 1, 2013 that OCD/DRU has in place the following:

- Proficient financial controls and procurement processes;
- Adequate procedures to prevent any duplication of benefits;
- Processes to ensure timely expenditure of funds;
- Ability to maintain comprehensive website(s) regarding all disaster recovery activities assisted with CDBG-DR funds; and
- Adequate measures to detect and prevent waste, fraud and abuse of funds.

J. Other

OCD/DRU will define "demonstrable hardship" and "not suitable for rehabilitation" as they relate to recovery programs in the policies and procedures associated with the use of these CDBG-DR funds.