

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, 2012 and 2013
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 PROPOSED PARTIAL ACTION PLAN No. 5
FOR THE UTILIZATION OF
COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
IN RESPONSE TO HURRICANE ISAAC**

Public Comment Period: June 10 – 23, 2015

Submitted to HUD: June 29, 2015

Approved by HUD: August 7, 2015

Bobby Jindal
Governor

Jay Dardenne
Lieutenant Governor

Kristy Nichols
Commissioner of Administration

I. Overview

This Partial Action Plan No. 5 allocates \$4,039,600, as a subset of Plaquemines Parish’s previously allocated \$16,953,000, to the newly created *Housing Elevation/HMGP Non-Federal Match Program* and further obligates \$1,009,900 for the program. This funding allocation and obligation, in accordance with the parish’s unmet needs assessment as outlined in the state’s Initial Action Plan approved November 4, 2013, is necessary to address unmet housing needs in Plaquemines Parish in response to Hurricane Isaac.

Program	Total Allocation	% of Allocation	Previous Action Plan Obligations	Obligation for Partial Action Plan No. 5	Future Partial Action Plans
St. John the Baptist Parish	\$32,674,000	50.8%	\$1,756,025	\$0	\$30,917,975
Plaquemines Parish	\$16,953,000	26.3%	\$1,129,000	\$1,009,900	\$14,814,100
FEMA Cost-Share	\$5,886,000	9.1%	\$5,886,000	\$0	\$0
State Administration, Planning and Program Delivery	\$3,320,000	5.2%	\$700,000	\$0	\$2,620,000
Hazard Mitigation Cost-Share Assistance Program	\$3,021,084	4.7%	\$1,090,000	\$0	\$1,931,084
Homeowner Rehabilitation Program	\$1,425,000	2.2%	\$712,500	\$0	\$712,500
Parish Recovery Priority Projects	\$1,100,000	1.7%	\$832,373	\$0	\$267,627
Total	\$64,379,084	100.0%	\$12,105,898	\$1,009,900	\$51,263,286

II. Program Description

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.

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.

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

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.

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

Given limited resources and these identified housing needs, the state seeks to leverage investment for long-term resilience. Therefore, it is critical the state utilize its CDBG-DR allocation within Plaquemines Parish to elevate residential structures, with a particular emphasis on LMI households. With this proposed allocation of \$4,039,600 and initial obligation of \$1,009,900 to the program, the state and parish believe this need will be diminished.

The *Housing Elevation/HMGP Non-Federal Match Program* is a voluntary elevation program, implemented and administered in conjunction with homeowner elevation activities conducted in accordance with the parish’s FEMA-funded Hazard Mitigation Grant Program (HMGP) for those homes located in flood-prone areas throughout the parish.

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 this Partial Action Plan No. 5.

Eligible Activities: 105(a)(4); 105(a)(9)

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

Activity Allocation: \$4,039,600

Activity Obligation: \$1,009,900

III. Overview and Delivery

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

IV. Program Size

The state will initially allocate \$4,039,600 and obligate \$1,009,900 to develop the program, but reserves the right to revise this allocation at a later date should it be warranted. Additionally, further obligations will be made as warranted via future amendments.

Assuming an average project cost of \$120,000, the cost-share amount will be an average of \$30,000. At current funding levels, approximately 134 households may receive elevation assistance through this program.

V. Eligible Applicants

Eligible applicants to the *Housing Elevation/HMGP Non-Federal Match Program* are limited to Plaquemines Parish residents who have demonstrable housing elevation needs and who have been approved for an elevation assistance award through FEMA's HMGP.

VI. 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 parish itself will submit requests for direct grant reimbursement for activities it conducts through the *Housing Elevation/HMGP Non-Federal Match Program*.

VII. Monitoring

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

VIII. Overall Grant Impact

This Partial Action Plan No. 5 allocates \$4,039,600 as a programmatic subset of the previous \$16,953,000 allocation the state made to address unmet needs in Plaquemines Parish. Additionally, this Partial Action Plan obligates \$1,009,900 to this newly-created program.

Obligation/Allocation Changes to Plaquemines Parish Allocation

Program	Allocation	Obligated in Previous Action Plans*	Obligated in Partial Action Plan No. 5	To Be Obligated in Future Partial Action Plans
Plaquemines Housing Assistance Program	\$12,828,400	\$1,100,000	\$0	\$11,728,400
Housing Elevation/HMGP Non-Federal Match Program	\$4,039,600	\$0	\$1,009,900	\$3,029,700
Admin/TBD	\$85,000	\$29,000	\$0	\$56,000
Total	\$16,953,000	\$1,129,000	\$1,009,900	\$14,814,100

IX. Public Comment

- A. This Partial Action Plan is considered substantial as it creates a new program, per the allowable activities described in the Initial Action Plan. The formal public comment period for the plan begins June 10, 2015 and runs through June 23, 2015 at 5 p.m.

Citizens and organizations can comment on this amendment via:

- The OCD/DRU website, http://www.doa.louisiana.gov/cdbg/dr/IC_ActionPlans.htm;
- Emailing them to ocd@la.gov;
- Mailing them to Disaster Recovery Unit, P.O. Box 94095, 70804-9095, Attn: Janice Lovett; or
- Faxing them to the attention of Janice Lovett at (225) 219-9605.

The plan will be translated into Vietnamese and Spanish to reach the limited English proficiency citizens in the impacted areas. Citizens with disabilities or those who need other technical assistance can contact the OCD/DRU office for assistance via the methods listed above.

- B. Summary of Public Comments and State's Response

The proposed Partial Action Plan was published for Public Comment on June 10, 2015 through June 23, 2015. The state did not receive any comments.