

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

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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 PARTIAL ACTION PLAN No. 1  
FOR THE UTILIZATION OF  
COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS  
IN RESPONSE TO HURRICANE ISAAC**

Public Comment Period: November 27-December 11, 2013

Submitted to HUD: December 18, 2013

Approved by HUD: January 2, 2014

**Bobby Jindal**  
Governor

**Jay Dardenne**  
Lieutenant Governor

**Kristy Nichols**  
Commissioner of Administration

## Overview

The State of Louisiana is the recipient of \$66,398,000 in Community Development Block Grant Funds from the United States Department of Housing and Urban Development (HUD) in response to Hurricane Isaac. In its Action Plan approved by HUD on November 4, 2013, the state allocated the majority of its funds to the most impacted parishes of St. John the Baptist and Plaquemines, and requested to transfer \$2,019,000 to St. Tammany Parish to be managed as part of their direct allocation, reducing the state’s total grant to \$64,379,000. The state indicated that the remaining \$11,432,000 would be designated for state-run programs.

Allocations	Total Allocation	% of Allocation	Previous Action Plan Obligations	Obligation for Partial Action Plan No. 1	Future Partial Action Plans
St. John the Baptist Parish	\$32,674,000	50.8%	\$55,000	-	\$32,619,000
Plaquemines Parish	\$16,953,000	26.3%	\$29,000	-	\$16,924,000
FEMA Cost-Share	\$5,886,000	9.1%	-	\$5,886,000	-
LMI HMA Cost-Share	\$4,446,000	6.9%	-	\$1,740,000	\$2,706,000
State Administration, Planning and Program Delivery	\$3,320,000	5.2%	\$700,000	-	\$2,620,000
Parish Recovery Priority Projects	\$1,100,000	1.7%	-	\$1,100,000	-
<b>Total</b>	<b>\$64,379,000</b>	<b>100.0%</b>	<b>\$784,000</b>	<b>\$8,726,000</b>	<b>\$54,869,000</b>

This Partial Action Plan No. 1 allocates funds to the following:

1. Statewide Cost-share for FEMA Public Assistance (PA) Category B funds and Transitional Sheltering Assistance (TSA) received in response to Hurricane Isaac;
2. Cost-share to Low-to Moderate-Income (LMI) households participating in parish Hazard Mitigation Assistance (HMA) programs in additional impacted parishes; and
3. 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.

Programmatic allocations and the specific obligations requested herein have been developed in a manner consistent with the state’s unmet needs assessment, as outlined in its Initial Action Plan approved November 4, 2013. As such, the state has granted individual allocations to the two most impacted parishes that did not receive their own awards — St. John the Baptist and Plaquemines — using a methodology consistent with such used by HUD in awarding grants to Orleans, Jefferson and St. Tammany parishes. With remaining funds, the state has proposed via this Partial Action Plan the three 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.

## I. Program Description

### A. Statewide Cost-Share for FEMA PA Category B and TSA

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 is obligating 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.

#### FEMA PA Categories

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

#### 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
<b>Total</b>	<b>\$466,265,038.07</b>	<b>\$116,566,259.52</b>

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 Amount:** \$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. This will allow the state to serve approximately 150 households across the 21 additional impacted parishes not identified for direct allocations. 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 preliminary allocations are as follows:

Parish	Estimated # Served	Estimated \$ 1st Round
Tangipahoa	15	\$450,000
Livingston	15	\$450,000
Washington	8	\$240,000
Terrebonne	10	\$300,000
All Other Parishes	10	\$300,000
<b>Total</b>	<b>58</b>	<b>\$1,740,000</b>

This would leave an additional **\$2,706,000** to be allocated in future funding rounds based on demand.

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 Amount:** \$4,446,000

**C. Parish Recovery Priority Projects**

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:

Parish	Proposed Allocation
Livingston	\$ 300,000
Tangipahoa	\$ 300,000
Washington	\$ 200,000
St. Bernard	\$ 150,000
St. James	\$ 150,000
<b>Total</b>	<b>\$1,100,000</b>

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 Amount:** \$1,100,000

## II. Public Comment

- A. This Partial Action Plan is considered substantial as it allocates more than \$1 million and adds an allowable activity described in the initial Action Plan. The formal public comment period for the plan begins Wednesday, November 27, 2013 and runs through Wednesday, December 11, 2013 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](http://www.doa.louisiana.gov/cdbg/dr/IC_ActionPlans.htm);
- Emailing them to [ocd@la.gov](mailto: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 November 27, 2013 through December 11, 2013. The state did not receive any comments.