



LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

U.S. Department of Housing and Urban Development

Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements

The Disaster Relief Supplemental Appropriations Act, 2022 (Public Law 117-43)

Federal Register Docket No. FR-6326-N-01

**State of Louisiana Substantial Action
Plan Amendment No. 1 for the Utilization
of Community Development Block Grant
Funds in Response to 2020 and 2021
Federal Declarations in Louisiana**

Public Comment Period: June 1 – June 30, 2022

ABSTRACT

The state previously submitted the action plan for Hurricanes Laura and Delta to the U.S. Dept. of Housing and Urban Development (HUD) on May 6, 2022.

This document reads as a substantial action plan amendment (Amendment I) to the Louisiana Office of Community Development's (OCD) Master Action Plan for Hurricanes Laura and Delta (*DR 4559 & 4570*), submitted to HUD for funding allocated to the state through the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43).

The state submits Amendment I as a response to the \$450 million increase in allocated funding for Hurricanes Laura and Delta, as well as a new funding allocation of \$1.27 billion for Hurricane Ida (*DR 4611*) and Louisiana Severe Storms, Tornadoes, and Flooding (*DR 4606*) (May 2021 Floods), announced in March 2022. As such, this document proposes modifications to the Master Action Plan for Hurricanes Laura and Delta related to budget increases, additional programming, and an expanded list of HUD-identified Most Impacted and Distressed (MID) areas.

Amendment I also addresses the unmet needs analysis for Hurricane Ida and the May 2021 Floods along with the proposed programs and budgets for the allocated \$1.27 billion.

As Louisiana was recovering from the record-breaking hurricane season of 2020, as well as the catastrophic damages of COVID-19, 2021 brought severe winter storms in February; severe storms, tornadoes, and flooding in May; and Hurricane Ida in August, which proved to be the costliest storm of 2021 and one of the strongest to ever hit the state. All of these natural disasters resulted in major disaster declarations from FEMA, and all caused significant damage to Louisiana residents, businesses, and communities. These three events resulted in 49 out of 64 parishes across the state receiving a disaster declaration for FEMA IA and qualified for appropriation under Public Law 117-43.

In 2020, Louisiana was hit by five named storms, breaking the state record for the most strikes in a single season. Three of these events, Hurricane Laura in August, and Hurricanes Delta and Zeta in October, resulted in 30 parishes receiving a disaster declaration for Federal Emergency Management Agency (FEMA) Individual Assistance (IA). Twenty-four of the 30 parishes were devastated by both Hurricanes Laura and Delta, which struck Southwest Louisiana just six weeks apart. With storms then occurring in the winter, spring, and summer of 2021, the state's need for disaster recovery and mitigation measures was exacerbated, with Hurricane Ida striking the state as a



Category 4 hurricane, dumping large amounts of rain and bringing 150-mph winds along with extremely high tides.

Now, as Louisiana looks to recover and rebuild from two years of historical natural disasters, the need for identifying and creating affordable housing for the state’s vulnerable populations has never been greater as available options have been depleted. Further, as has been demonstrated through these repeated weather events, the impacts of climate change are being felt in Louisiana. The state has designed the recovery and mitigation programs outlined in this Action Plan to increase resilience to the impacts of climate change and ensure a focus on equity in recovery.



LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

REVIEW HISTORY



TABLE OF CONTENTS

Abstract..... **ii**
Review History..... **iv**
Table of Contents..... **v**

SECTION 1 **9**

1. Executive Summary **9**
 Overview 9
 Disaster Specific Overview 9
 Summary..... 13
 Unmet Need and Proposed Allocations 16

2. Unmet Needs Assessment **17**
 Overview..... 17
 Demographic Information for Impacted Areas 18
 Age and Family Size 19
 Income Levels 20
 Education..... 21
 Disability 22
 Race 23
 Limited English Proficiency 23

A. Housing Unmet Need **25**
 Disaster Damage and Impacts 25
 1. Single-Family v. Multi-Family; Owner Occupied v. Tenant 29
 FEMA IA Owner Occupied 29
 FEMA IA Tenant Applicants 31
 FEMA IA Applications by Housing Type 32
 FEMA Real Property Damage Owner Occupied Units 33
 FEMA Real Property Damage Rental Units 34
 2. Public Housing and Affordable Housing 36
 Multifamily HUD-Assisted Housing..... 36
 Public Housing Authorities Damaged 36
 Owner with Unmet Need in a Floodplain 36
 Insurance Claims and Losses in Disaster Impacted Areas 37
 Total Home Loans Approved by SBA 38



Social Equity, Fair Housing and Civil Rights	39
Vulnerable Populations	40
Statewide Demographics and Disaster Impacted Populations	45
Education Demographics.....	46
Income Demographics.....	46
Income Demographics — Low income	47
LMI Analysis - Statewide.....	47
LMI Analysis- Federally Declared Disaster Areas.....	47
Mobile Housing Units Impacted by Disaster.....	48
SNAP and D-SNAP Applicants Impacted by the Disaster	49
Limited English Proficiency Breakdown.....	50
Languages Spoken Within State	52
Affected Continuum of Care Entities.....	55
Point-In-Time Count - Type Of Shelter.....	55
Point-In-Time Count - Impacted by Disaster.....	56
HUD Assisted Housing Impacted by the Disaster.....	56
B. Infrastructure Unmet Need	57
Disaster Damage and Impacts	57
FEMA Public Assistance Program	60
Total Cost and Need by PA Category.....	61
Approximate Recovery Cost per Agency	62
Hazard Mitigation Needs per County or Known Project (as applicable).....	62
C. Economic Revitalization Unmet Need	63
Disaster Damage and Impacts	63
Total Business Loans Approved by the SBA.....	66
SBA Applicant Breakdown	67
Estimating Business Operations Losses.....	68
Increased Occupation Demands.....	68
D. Mitigation Only Activities	68
3. General Requirements.....	69
A. Citizen Participation	69
Outreach and Engagement.....	69
Public Hearings	74
Complaints.....	75
B. Public Website	76
C. Amendments	76



Substantial Amendment.....	77
Non-Substantial Amendment.....	77
D. Displacement of Persons and Other Entities	77
E. Protection of People and other entities	78
Elevation standards	78
Flood Insurance Requirements.....	79
Construction Standards	79
Contractors Standards.....	80
Preparedness, Mitigation and Resiliency	81
Broadband Infrastructure in Housing.....	93
Cost-Effectiveness	94
Duplication of Benefits	95
4. Grantee Proposed Use of Funds	99
Overview.....	99
Program Budget.....	105
Connection to Unmet Needs.....	106
Leveraging Funds.....	107
Distribution of Funds.....	108
Program Income	110
Pre-Agreement Cost	110
Resale or Recapture.....	111
A. Program Details.....	112
Housing Programs	112
Infrastructure Programs	140
Economic Revitalization Programs	148
5. Appendix.....	153
A. Certifications	153
B. Waivers.....	155
C. Summary and Response of Public Comments.....	159
D. Data Sources/Methodologies.....	160
E. Important Definitions and Terms	160
F. Standard Form 424	161
6. Attachments	162
I. OCD Disaster Outreach Meetings, 2022.....	162
II. Public Comment Responses.....	164



SECTION 2 334

Amendment to Budget for Hurricanes Laura and Delta Recovery Programs Based On March 2022 Allocation of \$450 Million.....334
 Program Budget.....334
 Amended Proposed Allocation Amounts336



SECTION 1

1. EXECUTIVE SUMMARY

OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Louisiana will receive \$1,272,346,000 in funding to support long-term recovery efforts following *Hurricane Ida (DR 4611) and Louisiana Severe Storms, Tornadoes, and Flooding (DR 4606)* (May 2021 Floods) through the *Louisiana Office of Community Development - Disaster Recovery Unit*. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in *Louisiana*.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$1,272,346,000 in CDBG-DR funds to the *State of Louisiana* in response to *Hurricane Ida (DR 4611) and (DR 4606)*. Also, HUD allocated additional funds specifically \$10,776,000 to the *City of Lake Charles* and \$4,648,000 to the *City of Baton Rouge* in response to *Louisiana Severe Storms, Tornadoes, and Flooding (DR 4606)* through the publication of the Federal Register, *FR-6326-N-01 (Awards and Allocations - HUD Exchange)*. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43).

DISASTER SPECIFIC OVERVIEW

2021 STORMS

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

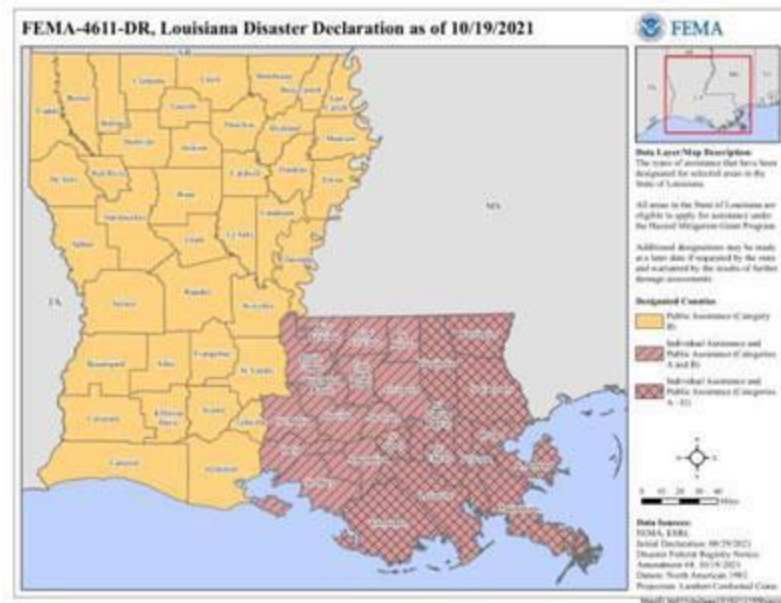
Hurricane Ida (DR-4611)

Hurricane Ida made landfall in Lafourche Parish on August 29, 2021, with sustained winds of 150 mph, just shy of a Category 5 storm. Hurricane Ida is tied with Hurricane Laura in 2020 as the strongest hurricane to strike Louisiana. Significant rainfall brought five to 10 inches of rain in areas throughout the state, with up to 17 inches recorded just outside of New Orleans, causing severe flash flooding that overcame levees and resulted in hundreds of high-water rescues. The wind gusts from the storm led to parish-wide power outages, uprooted trees, and debris that covered streets and barred transportation. Terrebonne and Lafourche parishes were particularly hard hit along with St. John, St. James, St. Charles, and large portions of lower Jefferson. According to the Louisiana Department of Health, Hurricane Ida resulted in a total of 29 storm-related deaths.



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

Twenty-five parishes were declared eligible for FEMA Individual Assistance in response to Hurricane Ida: Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana.



Source: <https://www.fema.gov/disaster/4611>

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

Hurricane Ida's 150-mph winds crippled south Louisiana's power grid, forcing critical infrastructure like hospitals, water and wastewater systems to implement emergency measures to be able to continue critical disaster recovery functions. Hurricane Ida left residents with widespread flooding, significant power outages and debris-covered streets. After the storm, more than 1 million Louisiana customers were without electricity.

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

REPETITIVE EVENTS

The number of affordable-housing units in the United States that are at risk of regular flooding is expected to triple by 2050 as sea levels rise.¹ The increases in sea levels exacerbates tropical storm intensity, rainfall rates, and creates an elevated storm surge risk. The National Oceanic and Atmospheric Administration’s 2022 Sea Level Rise Technical Report contains the updated projections for U.S. coastal waters and is a resource the state will consider when implementing mitigation efforts as Louisiana adapts to sea-level rise and its lasting effects.²

According to the FEMA Region 6 Mitigation, Floodplain Management and Insurance Branch, the state has 34,128 repetitive loss properties, of which 5,564 are severe repetitive loss. In the 25 parishes affected by Hurricane Ida, there were 28,916 repetitive loss properties and of those 4,622 were severe repetitive loss properties.

FEMA defines repetitive loss property as “any insurable building for which two or more claims of more than \$1,000 were paid by the National Flood Insurance Program (NFIP) within any rolling ten-year period, since 1978.”³ FEMA defines a *severe* repetitive loss property as “a single family property (consisting of 1 to 4 residences) that is covered under flood insurance by the NFIP and has incurred flood-related damage for which 4 or more separate claims payments have been paid under flood insurance coverage, with the amount of each claim payment exceeding \$5,000 and with cumulative amount of such claims payments exceeding \$20,000; or for which at least 2 separate claims payments have been made with the cumulative amount of such claims exceeding the reported value of the property.”⁴

The figure below depicts both the repetitive loss and severe repetitive loss properties with predicted land loss and gain in the next 20 years based on a medium environmental scenario from the Coastal Protection Restoration Agency of Louisiana.⁵ This map highlights vulnerable communities in three parishes (Orleans, Lafourche, and Terrebonne) that should consider future land loss when rebuilding. East Baton Rouge and Ascension Parishes are also highlighted to note the concentration of repetitive loss properties.

¹ [Outdated Federal Flood Standards Put People at Risk | NRDC](#)

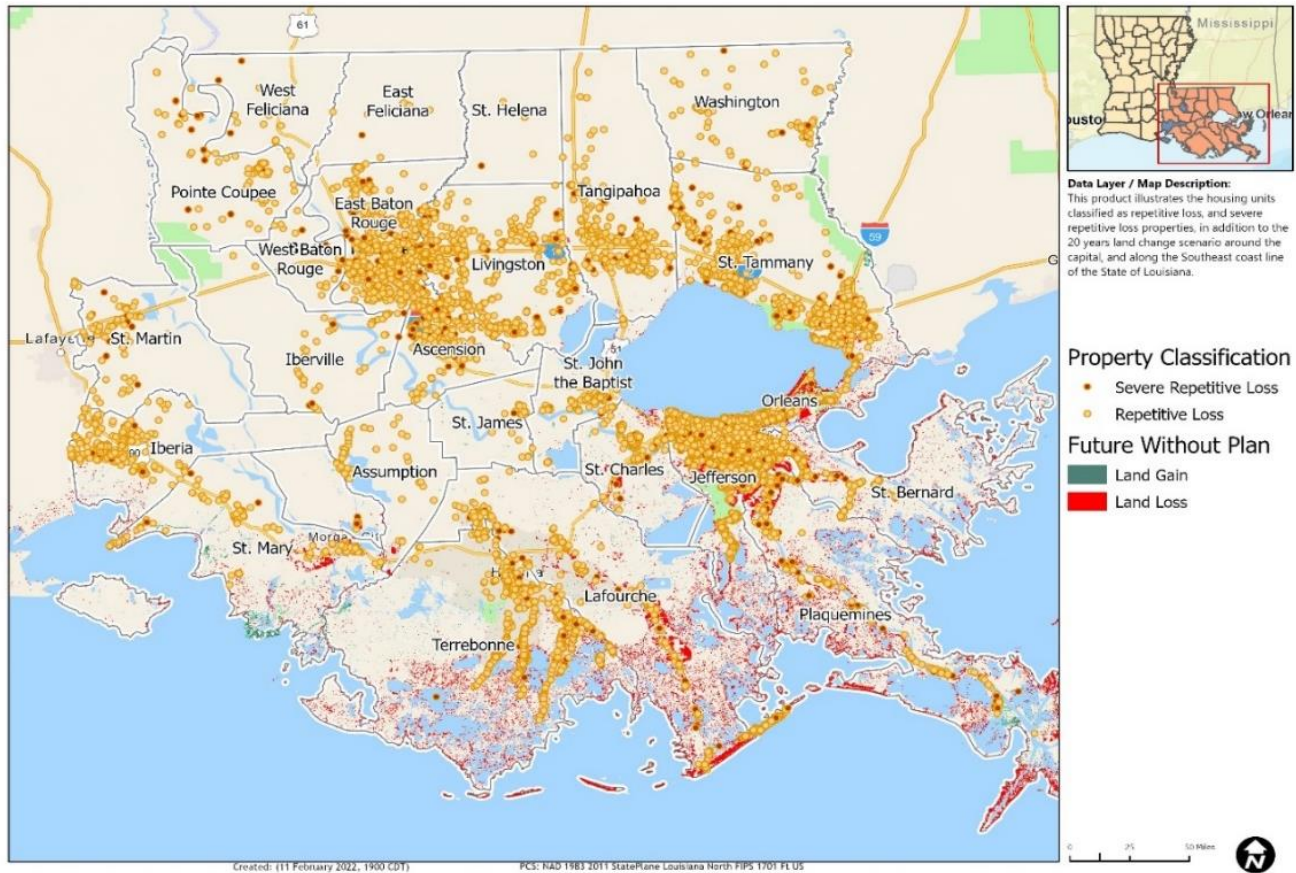
² [2022 Sea Level Rise Technical Report \(noaa.gov\)](#)

³ https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt

⁴ https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt

⁵ The maps were created from information from the U.S. Department of Housing & Urban Development, U.S. Department of Agriculture, Coastal Protection Restoration Agency of Louisiana, and ESRI.

FIGURE: MAP OF REPETITIVE LOSS PROPERTIES AND FUTURE LAND LOSS IN 20 YEARS



SUMMARY

Louisiana residents across the state are looking to rebuild and recover after six different federally declared disasters occurred in just two years amidst an ongoing pandemic. In total, 60 out of the 64 parishes were impacted by at least one of the disasters of 2020 and 2021. Of the 60 parishes that qualified for IA, 28 have been repeatedly impacted by weather events and received multiple declarations. Caldwell, East Carroll, Evangeline, and Tensas parishes are the four parishes that did not receive a federal disaster declaration in 2020 or 2021.

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

The state immediately began citizen engagement efforts following the 2020 and 2021 disasters to gather data regarding impacts and unmet needs, beginning with local officials and personnel in the impacted communities. Citizen engagement efforts remain ongoing through the public comment period to inform program design and



keep a pulse on the outstanding unmet needs of Louisiana residents. The Louisiana Office of Community Development - Disaster Recovery Unit will lead a series of public meetings across the state, with in-person meetings held in the most impacted parishes. The state is taking measures to ensure all public hearings are recorded and made available to the public after each meeting. The state has also worked closely with local leaders and stakeholders to ensure Louisiana residents were made aware of this funding allocation and the opportunity to present feedback. Citizen engagement efforts include but are not limited to public hearings, social media outreach, earned media engagement, traditional marketing around the availability of the draft action plan for public review, and additional targeted outreach in the 22 HUD-declared MID areas from Hurricanes Ida.

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

Through this Action Plan, the state presents unmet need estimates from the 2020 storms and now the additional needs that have arisen from subsequent 2021 disasters that have compounded total disaster related unmet needs across the state. Based on the Unmet Needs Assessment presented in this document, the state has calculated a total unmet need of \$1,391,654,529 attributable to Hurricane Ida.

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

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



industries, for which this disaster was as catastrophic as any in the state’s history. Still, given the intent of the CDBG program, the state will – as it has in the past – first prioritize housing recovery activities in effectuating its long-term recovery efforts.

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

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

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

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

The table below details the distribution of the **\$1,272,346,000** for Hurricane Ida and May 2021 Floods from the Disaster Relief Supplemental Appropriations Act 2022.



UNMET NEED AND PROPOSED ALLOCATIONS

CATEGORY	REMAINING UNMET NEED	% OF UNMET NEED	PROGRAM ALLOCATION AMOUNT	% OF PROGRAM ALLOCATION
Administration	49,106,160	1.4%	49,893,840	3.9%
Planning	0	0.0%	1,000,000	0.1%
Housing	550,279,191	16.1%	867,873,287	68.2%
Infrastructure	184,530,483	5.4%	232,883,641	18.3%
Economic Revitalization	2,624,304,768	77.0%	120,695,232	9.5%
Public Services	0	0.0%	0	0.0%
Total	3,408,220,601	100.0	1,272,346,000	100%

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

**Allocation Amount includes project delivery costs and does not include administration and planning costs.*

2. UNMET NEEDS ASSESSMENT

OVERVIEW

In accordance with HUD guidance, the State of Louisiana completed the following unmet needs assessment to identify priorities for CDBG-DR funding allocated in response to impacts from Hurricane Ida and the May 2021 Floods.

The assessment below utilizes federal and state resources, including data provided by FEMA, HUD, and the Small Business Administration (SBA), among other sources, to estimate unmet needs in three main categories of damage: housing, economy, and infrastructure. HUD has identified the following areas as Most Impacted and Distressed (MID) from Hurricane Ida and the May 2021 Severe Storms: Ascension, Assumption, Calcasieu, East Baton Rouge, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Mary, St. Tammany, Tangipahoa, Terrebonne, and Washington Parishes; 70764 & 70788 (Iberville Parish) and 70767 (West Baton Rouge Parish).

Each of the specified areas had more than 1,000 housing units damaged in Hurricane Ida and collectively 96 percent of all damaged units are within these parishes. This unmet needs assessment focuses on statewide impacts, with specific sections detailing particular needs within the most impacted areas, and where relevant, smaller geographic units. Impacted parishes sustained damages due to severe storm flooding, wind, and excessive rainfall.

Grantee-Identified MID Areas

In addition to the 22 HUD-identified MID areas from Hurricane Ida and the May 2021 Floods, the state has identified the following parishes as MID: East Feliciana, Iberia, Iberville, Point Coupee, St. Martin, West Baton Rouge and West Feliciana.

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

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

special needs and senior populations, inclusive of supportive services, and planning for the increasing risks of populations living along the Gulf Coast area should be a focus of the recovery efforts.

Approximately 61 percent of the state’s population is located within the 27 IA parishes affected by Hurricane Ida and May Floods of 2021.

Of this total:

- 93 percent of the population residing in the 27 IA parishes is located within one of the 22 areas identified by HUD as most impacted and distressed.
- It is important to note that the population residing within the 22 areas identified as most impacted and distressed comprises roughly 57 percent of the state’s total population.

Demographic Information for Impacted Areas

Selected American Community Survey data for the IA parishes, as well as the entire state, are provided in the succeeding tables below. Several categories of information will be highlighted and discussed, to emphasize parishes which may have particularly high (or low) values. For example, parishes with median household income values well above (125%) or below (75%) of the state median (\$49,469) were identified.

The declared parishes have a combined population of 2,699,273⁶, comprising 58 percent of the total Louisiana population. There are eight IA parishes with population exceeding 100,000, including Ascension, East Baton Rouge, Jefferson, Livingston, Orleans, St. Tammany, Tangipahoa, and Terrebonne. Those eight parishes have a combined population of 2,057,648 (or 76.2% of the population of all the IA parishes). The two most populous parishes are East Baton Rouge with 456,781 residents and Jefferson with 440,781 residents, which are located within the Baton Rouge and New Orleans-Metairie metropolitan areas, respectively. East Baton Rouge and Jefferson parishes combined represent 33.3 percent of the population of the 25 IA parishes. In contrast, the eight smallest declared parishes (Assumption, East Feliciana, Plaquemines, Pointe Coupee, St. Helena, St. James, West Baton Rouge, and West Feliciana) each have a population under 28,000. With a combined population of 158,472, the eight smallest parishes account for only 5.9 percent of the population of the 25 IA parishes. The nine remaining IA parishes, ranging in population from 30,241 in Iberville Parish to 97,557 in Lafourche Parish, comprise 17.9 percent of the population of the IA parishes.

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

Although the smaller parishes may have a comparatively small portion of the state’s disaster survivors, consideration of the housing impacts and recovery in those parishes is critical for the economic resilience of those areas. To consider the comprehensive housing needs of those parishes will require looking beyond the total number of FEMA registrants or damage.

Age and Family Size

The portion of people in the 25 IA parishes for Hurricane Ida under 18 years of age ranges from 16.3 to 27 percent and is generally comparable to the entire state (where 23.7% of the population is under 18). Ascension Parish has the highest rate of population under 18 years of age at 27 percent and has an average family size of 3.4 household members. West Feliciana Parish has the largest average family size of the declared parishes at 4.1 household members, despite having the lowest percentage of people under 18 years of age (16.3%). For the 60+ age cohort, the range is more widespread at 16.4 to 28.3 percent, compared to Louisiana’s 21.3 percent statewide. Communities with high percentages of young and/or residents aged 60 and over may face increased recovery challenges because these segments of the population may require more resources to support their recovery.

Average household sizes are smaller than average family sizes, in large part because a family contains a minimum of two people, whereas only one person is needed to form a household. In Louisiana, the average household size is 2.6 (compared to the state’s average family size of 3.3 household members).

HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

LOCATION	POPULATION	AGE, PERCENT		FAMILY SIZE
		Under 18	60+	
Louisiana	4,657,757	23.70%	21.30%	3.3
Ascension	126,500	27.00%	17.00%	3.4
Assumption	21,039	22.00%	23.80%	3.4
East Baton Rouge	456,781	22.80%	19.50%	3.4
East Feliciana	19,539	18.20%	24.60%	2.7
Iberia	69,929	26.30%	21.30%	3.2
Iberville	30,241	21.10%	21.30%	3.4
Jefferson	440,781	22.10%	23.40%	3.2
Lafourche	97,557	23.40%	21.50%	3.1



HOMEOWNERS WITH DAMAGE BY DAMAGE TYPE

Livingston	142,282	25.90%	19.00%	3.4
Orleans	383,997	20.10%	20.70%	3.7
Plaquemines	23,515	26.10%	19.20%	3
Pointe Coupee	20,758	22.30%	28.30%	3.1
St. Bernard	43,764	26.80%	16.40%	3.8
St. Charles	52,549	24.60%	19.40%	3.1
St. Helena	10,920	21.30%	27.40%	3.2
St. James	20,192	22.90%	24.30%	3.3
St. John the Baptist	42,477	24.80%	20.30%	3.3
St. Martin	51,767	24.30%	21.20%	3.2
St. Mary	49,406	24.20%	22.80%	3.5
St. Tammany	264,570	24.10%	23.40%	3.3
Tangipahoa	133,157	24.60%	20.10%	3.3
Terrebonne	109,580	25.50%	19.90%	3.4
Washington	45,463	24.10%	24.80%	3.1
West Baton Rouge	27,199	23.90%	20.20%	3
West Feliciana	15,310	16.30%	20.20%	4.1

Source: American Community Survey 2019 5-year data

Income Levels

More than half of the 25 IA parishes have a median household income above the statewide figure of \$49,469. Of the declared parishes, Ascension Parish, located within the Baton Rouge metropolitan area, has the highest median income at \$80,527. Of the 25 IA parishes, none have household income below 75 percent of the statewide

median, and five have a household income above 125 percent of the statewide median (Ascension, Livingston, St. Charles, St. Tammany, and West Baton Rouge).⁷

The ability to address the financial demands of disaster recovery at the individual or family level is often a function of family income. Those costs may be borne by insurance, savings, loans, or external assistance. The median household income⁸ for Louisiana (all parishes) is \$49,469 (mean of \$71,001). The median household income in the 25 IA parishes ranges from \$37,570 to \$80,527 (the mean household incomes range from \$52,104 to \$94,664). Of the declared parishes, 7 have a median household income below \$45,000 (Assumption, Orleans, Pointe Coupee, St. Bernard, St. Helena, St. Mary, and Washington). Washington Parish has the lowest median household income at \$37,570. Only four parishes have a median household income above \$65,000 (Ascension, St. Charles, St. Tammany, and West Baton Rouge). Ascension Parish has the highest median household income amongst the IA parishes at \$80,527.

Several of these parishes have a greater portion of the population who derive a portion of their household income from Social Security and retirement sources. In Louisiana, 31.3 percent of households receive income from Social Security, averaging \$17,430⁹ statewide. In the 25 IA parishes, that ranges from 25 percent to 40.2 percent (Ascension Parish is at 25.0% and St. Helena is 40.2%). In 17 of the 25 IA parishes, the percentage of households who receive Social Security benefits exceeded the statewide average (Assumption, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Pointe Coupee, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, and West Feliciana). In Louisiana, 18.5 percent of households receive some form of retirement income outside of Social Security, averaging \$24,780. Among the IA parishes, 10 have more than 20 percent of households receiving retirement income (East Baton Rouge, East Feliciana, Iberville, Pointe Coupee, St. Charles, St. Helena, St. James, St. Tammany, West Baton Rouge, and West Feliciana). Residents in the impacted parishes who live on a fixed income derived primarily from either Social Security or retirement benefits may face additional recovery resource challenges.

Education

In Louisiana, 14.8 percent of residents lack a high school degree while 24.1 percent possess a bachelor's degree or higher. In the 25 IA parishes, 15 percent exceed the statewide average of the parish population without high

⁷ As shown in Table DP03 of the 2019 5-year ACS.

⁸ Median income may be a more effective statistic because it is less prone to being influenced by high incomes at the very top of the range.

⁹ As shown in Table DP03 of the 2019 5-year ACS

school degrees, represented in the table below. In the IA parishes, this ranges from 16.3 percent in Plaquemines Parish to a high of 25.6 percent in Assumption Parish. Baton Rouge Parish and Orleans Parish, which are located in the Baton Rouge and New Orleans-Metairie metropolitan areas, respectively, have larger proportions of college graduates (34.9% and 37.6%, respectively) while others in less populated areas (Lafourche and Terrebonne) do not (ranging from 15.6%-16.9%). The 21 remaining parishes have a proportion of residents with a bachelor's degree or higher ranging from 9.6 percent to 33.8 percent, with nearly half of those parishes averaging less than 15 percent for residents with a bachelor's degree or higher (Assumption, East Feliciana, Iberia, Iberville, Pointe Coupee, St. Bernard, St. Martin, St. Mary, and Washington parishes). Those without bachelor's degrees may experience limited options with respect to employment in their recovery from the disaster, particularly if businesses close or modernize as part of recovery efforts. Additionally, this may impact state or local economic development initiatives that require increased educational attainment for the workforce.

Disability

Individuals with disabilities face additional challenges with respect to disaster recovery. The ACS data presents disability information for three age groups, under 18, 18 to 64, and 65 and over. The Louisiana estimates for individuals with a disability in those age groups is 5.6 percent, 13.4 percent and 38.8 percent respectively. For the youngest group (under 18), Assumption, East Baton Rouge, Iberia, Iberville, Lafourche, Livingston, Pointe Coupee, St. Helena, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana parishes all have at least 6 percent of the population is disabled (Louisiana average is 5.6%). Among the working age group, the disability percentages equal or exceed the statewide average in Assumption, East Feliciana, Iberia, Iberville, Lafourche, Pointe Coupee, St. Bernard, St. Helena, St. Mary, Tangipahoa, Terrebonne, and Washington. For residents 65 and older, parishes exceeding the statewide average include Assumption, Iberville, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Helena, St. James, St. John the Baptist, St. Martin, Tangipahoa, Terrebonne, and Washington. Amongst the IA parishes, Pointe Coupee Parish has the highest percentage of the population aged 65 and over with a disability at 53.3 percent.

Planning for individuals with disabilities is essential in recovery efforts as this group often needs additional housing considerations, particularly individuals with mobility challenges. In areas prone to flooding, the challenge is to balance the need for elevation while avoiding denying housing choice to individuals unable to use stairs or long ramps. While mechanical lifts may be a solution for accessibility in elevated single-family housing, the long-term operation and maintenance of those devices must be considered, as individuals with disabilities may not have the financial resources to assume the maintenance responsibilities.

Race

Race may play a role in engaging and assisting disaster survivors as lines of communication and community priorities may differ among different races. According to the ACS,¹⁰ while 58.7 percent of the Louisiana population identifies as white, in the 25 IA parishes, that ranges from 30.7 percent to 87.7 percent. Orleans Parish, which is located in the New Orleans-Metairie metropolitan area, has the lowest at 30.7 percent, not unexpected as urban areas often have significant minority communities.

Black or African American populations represent 32 percent of Louisiana's population in the IA parishes. The population distribution is predominantly in Orleans Parish, with 58.9 percent of the parish's population; St. John the Baptist Parish, with 56.1 percent of the population; and St. Helena Parish, with 52.5 percent of the population. In the remaining IA parishes, the average Black or African American population is 29.75 percent.

The percentage of American Indian and Alaska Native in the IA parishes are the highest in Terrebonne and Lafourche parishes at 5.6 percent and 2.1 percent, respectively. Plaquemines, St. Helena, and St. Mary parishes all have approximately 1 to 1.5 percent of their respective populations comprised of American Indian and Alaska Natives. Statewide, American Indian and Alaska Natives represent less than 1 percent (0.5%) of the Louisiana population.

Limited English Proficiency

While the Hispanic or Latino populations in the IA parishes are generally lower than the Louisiana average (5.1%), six parishes exceed the statewide rate by more than 1 percent. The highest is Jefferson Parish, with 14.5 percent of the population identifying as Latino, followed by St. Bernard (10.1%), Plaquemines (7.3%), St. Mary (7.0%), St. Charles (6.1%), and St. John the Baptist (6.1%). Hispanic or Latino residents may face communication challenges throughout the disaster recovery process, as those parishes also have the greatest proportion of residents with Limited English Proficiency (LEP).¹¹

Engaging in the disaster recovery process is challenging for all survivors, particularly those with LEP. In Louisiana, 2.9 percent of the population is considered to have LEP, with four of the six parishes identified above with a large Hispanic or Latino population maintaining a higher percentage than the state average. The five parishes with the highest rates of LEP are Jefferson with 8.7 percent of the population; East Baton Rouge and Plaquemines with 3.7

¹⁰ Table DP05 of the 2019 5-year ACS

¹¹ Table DP02 of the 2019 5-year ACS

percent each, respectively; St. Mary with 3.5 percent; and St. Bernard with 3.4 percent. The ACS data further shows that these are largely Spanish speakers in East Baton Rouge, Jefferson, St. Bernard, and St. Mary parishes, and a relatively even split between speakers of other European languages and Asian or Pacific Islander languages in Plaquemines Parish.

**TABLE: DEMOGRAPHICS –
DECLARED PARISHES - INCOME, EDUCATION, RACE, DISABILITY, LEP**

LOCATION	HOUSEHOLD INCOME (2019)		EDUCATION		DISABILITY, ALL AGES	RACE					HISPANIC OR LATINO	LIMITED ENGLISH PROFICIENCY (LEP)
	MEDIAN	MEAN	NO HS GRAD	BACHELORS OR HIGHER		WHITE	BLACK OR AFRICAN AMERICAN	AMERICAN INDIAN AND ALASKA	OTHER			
Louisiana	\$49,469	\$71,001	14.80%	24.10%	15.30%	58.70%	32.00%	0.50%	3.70%	5.10%	2.90%	
Ascension	\$80,527	\$94,664	11.40%	26.40%	12.20%	68.40%	21.70%	0.10%	4.20%	5.60%	2.60%	
Assumption	\$43,759	\$63,643	25.60%	9.60%	22.50%	65.60%	29.90%	0.40%	1.10%	3.00%	2.30%	
East Baton Rouge	\$54,948	\$82,340	9.50%	34.90%	14.70%	44.60%	46.00%	0.10%	5.10%	4.20%	3.70%	
East Feliciana	\$51,803	\$68,891	20.00%	12.70%	15.20%	53.40%	43.30%	0.50%	1.20%	1.70%	0.80%	
Iberia	\$46,861	\$61,590	20.10%	13.60%	16.20%	58.80%	31.50%	0.10%	5.40%	4.20%	3.20%	
Iberville	\$50,161	\$66,504	20.40%	13.90%	19.80%	47.70%	48.10%	0.10%	1.50%	2.60%	0.50%	
Jefferson	\$54,032	\$74,367	14.30%	26.80%	14.30%	52.60%	26.40%	0.30%	6.10%	14.50%	8.70%	
Lafourche	\$55,506	\$73,249	21.80%	16.90%	17.20%	76.80%	13.60%	2.10%	3.10%	4.40%	2.50%	
Livingston	\$63,389	\$80,470	14.80%	19.70%	13.20%	87.70%	5.90%	0.20%	2.40%	3.70%	1.80%	
Orleans	\$41,604	\$71,938	13.50%	37.60%	14.20%	30.70%	58.90%	0.10%	4.80%	5.50%	2.90%	
Plaquemines	\$57,204	\$76,432	16.30%	19.10%	14.80%	63.90%	19.90%	1.10%	7.80%	7.30%	3.70%	
Pointe Coupee	\$41,480	\$66,680	20.20%	14.90%	26.70%	60.30%	35.80%	0.00%	1.30%	2.60%	1.10%	
St. Bernard	\$44,661	\$56,887	19.80%	11.60%	17.60%	62.30%	22.70%	0.20%	4.70%	10.10%	3.40%	
St. Charles	\$69,019	\$89,045	10.00%	25.30%	11.80%	65.10%	26.30%	0.40%	2.10%	6.10%	1.40%	
St. Helena	\$43,886	\$61,237	22.50%	16.70%	19.00%	44.10%	52.50%	1.10%	0.40%	1.80%	2.10%	
St. James	\$51,603	\$70,558	14.60%	16.30%	14.40%	48.20%	49.60%	0.00%	0.60%	1.70%	0.40%	
St. John the Baptist	\$57,429	\$70,802	13.90%	15.90%	12.90%	34.30%	56.10%	0.00%	3.40%	6.10%	2.20%	
St. Martin	\$48,656	\$65,800	18.10%	14.50%	14.90%	64.30%	29.10%	0.40%	3.20%	3.00%	3.30%	
St. Mary	\$40,485	\$54,359	17.20%	10.20%	17.50%	56.10%	30.30%	1.50%	5.10%	7.00%	3.50%	
St. Tammany	\$68,905	\$91,595	9.50%	33.80%	15.00%	78.60%	12.00%	0.50%	3.40%	5.60%	2.80%	
Tangipahoa	\$47,832	\$64,903	16.40%	20.00%	19.90%	63.20%	29.40%	0.30%	2.90%	4.30%	1.70%	
Terrebonne	\$48,747	\$69,122	21.00%	15.60%	16.60%	66.70%	18.90%	5.60%	3.70%	5.20%	2.50%	
Washington	\$37,570	\$52,104	20.50%	11.60%	21.70%	65.50%	30.10%	0.20%	1.80%	2.30%	2.70%	
West Baton Rouge	\$65,385	\$79,390	12.80%	22.00%	13.90%	55.90%	39.70%	0.10%	1.20%	3.10%	0.90%	
West Feliciana	\$59,637	\$85,586	17.90%	24.20%	11.50%	52.40%	44.40%	0.20%	1.80%	1.20%	1.30%	

**TABLE: DEMOGRAPHICS –
DECLARED PARISHES - INCOME, EDUCATION, RACE, DISABILITY, LEP**

Source: 2019 ACS 5-year data

Note: "Other Race" includes Asian, Native Hawaiian and other Pacific Islander, other, and two or more races.

IMPACTS OF INSURANCE (HOI AND NFIP).

In conducting this analysis, the state has attempted to isolate owner-occupied households with evidence of flooding damage apart from those with no evidence of flooding damage. For the purposes of this analysis, in the absence of evidence of flood damage, units are assumed to be impacted exclusively by wind. As such, for the proportion of owner-occupied units with no evidence of flooding damage, the state is especially concerned about the high rate of households reported not to carry a standard hazard insurance policy that would otherwise be expected to offset documented losses. In total, 73 percent of the wind-impacted population is reported not to carry hazard insurance as shown in the table below (major/severe damage categories only).

	IDA & SPRING FLOOD	COUNT W/O HOI OR FLOOD INS	% W/O HOI OR FLOOD INS
Wind Damage Only	31,663	23,448	74%
Flood Damage	9,345	6,454	69%
Totals	41,008	29,902	73%

A. HOUSING UNMET NEED

Disaster Damage and Impacts

As Louisiana was recovering from FEMA-declared damage to 56 out of 64 parishes as a result of the 2016 floods, the state's housing stock was still rebounding. These events left an indelible mark on Louisiana and have exposed new challenges to the state's approach to flood risk reduction for all residents.

Louisiana is facing increased risk, in both magnitude and frequency, of flood events. This risk threatens our natural and built environment and our way of life. Specifically:

- Due to climate change, sea-level rise, and the threat of coastal land loss, the frequency, and intensity of tropical cyclones and severe thunderstorms have continued to increase.

- Both state and local hazard mitigation plans consistently demonstrate that the entire State of Louisiana is at severe flood risk and that the occurrence of future catastrophic flood events cannot be predicted solely by relying on the damage patterns of past events.

This difficulty is compounded when attempting to assemble future projections of risks because the state does not have the ability to accurately estimate the cost of long-term and repeated flood damage. As a result, wind- and flood-related damages have largely been underestimated.

HOUSING

- Number of housing units damaged in 2021 storms: 183,686
- 82,474 homeowners
- 26,556 major-severe / 55,918 minor
- 58,041 LMI / 24,433 non-LMI
- 101,212 renters
- 13,239 major-severe / 87,973 minor
- 85,510 LMI / 15,702 non-LMI
- Orleans (26%) and Jefferson (25%) parishes comprise 50% of all housing unit damages.
- Number of homeowners with wind damage: 31,663 (74 percent without homeowner insurance)
- Number of homeowners with flood damage: 9,345 (69 percent without flood insurance)

STATEWIDE HOUSING DAMAGE AND LOSS ASSESSMENT

The state compiled information to document damages across several different population stratifications, including owner-occupied and renter households, households with flood damage without flood insurance, households with wind damage without hazard insurance, households within the 22 most impacted and distressed areas, and low- and moderate-income (LMI) households. For the purposes of this analysis, the state used full applicant-level data collected through FEMA's IA program. Datasets for Ida are as of January 2022. Unless otherwise noted, all housing summary data were compiled from these datasets.

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

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

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage



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

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

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

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

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

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

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

FEMA/SBA MULTIPLIER – IDA

CATEGORY	COUNT	FEMA RP FVL	SBA RP VL	MULTIPLIER
Severe	482	23,444,972	39,937,564	1.70
Major-High	1,128	21,228,171	73,525,205	3.46
Major-Low	2,158	20,994,423	121,445,134	5.78
Minor-High	3,242	15,334,294	149,579,804	9.75
Minor-Low	2,848	3,118,093	112,454,566	36.07
Totals	9,858	84,119,954	496,942,273	

FEMA/SBA MULTIPLIER – SPRING FLOOD

CATEGORY	COUNT	FEMA RP FVL	SBA RP VL	MULTIPLIER
Severe	-	-	-	1.00
Major-High	4	47,243	205,058	4.34
Major-Low	104	827,532	6,530,577	7.89
Minor-High	173	1,253,355	9,717,210	7.75
Minor-Low	66	54,015	2,687,938	49.76
Totals	347	2,182,145	19,140,783	8.80

AFFORDABLE HOUSING PROGRAM REQUIREMENTS

The Action Plan provides for several affordable rental programs. The requirements of these programs are in addition to the requirements of other funding sources for each project (such as LIHTC credits allocated through the Louisiana Housing Corporation). In connection with those programs, generally "Affordable Rents" for LMI tenants by requiring grantees, subrecipients, or borrowers (as applicable) to adhere to the following affordable rent requirements:



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

INCOME REQUIREMENTS

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

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

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

FEMA IA OWNER OCCUPIED

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Ascension	18,568	5,762	2,094	2,251	15,218,879	6,761
Assumption	3,577	1,878	965	1,010	5,875,865	6,089
Calcasieu	1,823	1,210	817	1,210	8,234,001	6,805
East Baton Rouge	36,746	14,058	2,763	3,111	17,661,607	5,677
East Feliciana	2,123	902	365	396	2,176,250	5,962
Iberia	3,730	3,240	228	228	1,373,020	6,022
Iberville	3,213	1,889	579	641	3,888,310	6,066
Jefferson	88,420	24,324	11,163	11,798	119,816,096	10,733



COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS	AVERAGE FEMA VERIFIED AMOUNT
Lafourche	25,348	11,305	7,142	7,299	116,946,062	16,374
Livingston	24,291	7,242	3,190	3,423	25,141,469	7,881
Orleans	57,824	18,794	9,457	10,122	62,375,506	6,596
Plaquemines	5,245	2,299	1,576	1,667	12,915,842	8,195
Pointe Coupee	999	623	98	98	741,887	7,570
St Bernard	8,896	2,840	1,519	1,613	8,295,266	5,461
St Charles	14,441	4,627	2,393	2,475	35,895,986	15,000
St Helena	3,232	1,800	1,187	1,278	7,202,082	6,067
St James	5,297	2,565	1,395	1,424	16,217,748	11,626
St John the Baptist	12,882	6,722	3,722	3,810	73,756,928	19,816
St Martin	1,760	1,497	120	120	661,971	5,516
St Mary	3,360	2,151	629	633	4,247,955	6,754
St Tammany	46,301	10,915	3,995	4,384	30,284,299	7,581
Tangipahoa	29,198	12,137	6,658	6,935	55,849,249	8,388
Terrebonne	26,497	12,641	8,041	8,190	137,209,316	17,064
Washington	6,405	2,888	1,245	1,338	7,051,135	5,664
West Baton Rouge	1,652	964	136	136	942,911	6,933
West Feliciana	621	412	57	57	363,252	6,373
Total	432,449	155,685	71,540	75,647	770,342,893	10,183

Data Source(s): FEMA IA Data



FEMA IA TENANT APPLICANTS

COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS (\$)	AVERAGE FEMA VERIFIED AMOUNT
Ascension	10,691	7,713	1,626	2,294	2,059,621	898
Assumption	2,170	1,798	392	474	606,918	1,548
Calcasieu	1,611	760	279	760	1,222,076	1,608
East Baton Rouge	56,375	34,471	5,800	9,972	8,478,585	1,280
East Feliciana	1,425	1,125	69	103	116,357	1,686
Iberia	5,686	5,258	51	52	190,600	3,737
Iberville	3,650	3,028	179	208	656,469	3,156
Jefferson	79,101	56,810	31,247	40,180	40,432,764	1,294
Lafourche	10,892	8,942	5,016	5,690	10,499,392	2,093
Livingston	11,179	7,091	1,597	2,387	1,886,567	1,181
Orleans	96,852	68,719	36,823	48,344	41,224,852	1,120
Plaquemines	2,781	1,875	887	1,227	1,267,012	1,428
Pointe Coupee	2,476	2,262	37	37	135,664	3,667
St Bernard	6,846	4,903	2,506	3,203	2,607,489	1,040
St Charles	5,678	4,761	3,081	3,477	6,087,655	1,976
St Helena	992	738	337	403	341,673	1,014
St James	2,128	1,812	937	1,026	1,946,750	2,078
St John the Baptist	6,556	5,853	3,629	3,796	11,548,346	3,182
St Martin	3,932	3,756	49	49	147,413	3,008
St Mary	4,375	3,469	144	152	625,674	4,345
St Tammany	24,535	15,129	4,996	7,577	532,523	1,067
Tangipahoa	17,873	13,022	6,407	7,695	9,219,584	1,439
Terrebonne	15,788	13,029	8,208	9,365	16,243,223	1,979



COUNTY	# OF APPLICANTS	# OF INSPECTIONS	# INSPECTED WITH DAMAGE	# RECEIVED ASSISTANCE	TOTAL FEMA VERIFIED LOSS (\$)	AVERAGE FEMA VERIFIED AMOUNT
Washington	4,483	3,133	673	850	1,161,327	1,726
West Baton Rouge	2,399	1,901	61	62	262,632	4,305
West Feliciana	632	574	11	11	36,426	3,311
Total	381,106	271,905	115,042	149,394	164,337,589	1,100

Data Source(s): FEMA IA Data

FEMA IA APPLICATIONS BY HOUSING TYPE

RESIDENCE TYPE	# OF APPLICANTS	% OWNER OCCUPIED	% TENANTS	% UNKNOWN	% TYPE
Apartment	139,865	.02%	17.07%	.02%	17.11%
Assisted Living Facility	2,202	0%	.04%	0%	.27%
Boat	567	.03%	.04%	0%	.07%
College Dorm	514	0%	.06%	0%	.06%
Condo	9,223	.68%	.45%	0%	1.13%
Correctional Facility	65	0%	0%	0%	.01%
House/Duplex	559,534	44.73%	23.63%	.09%	68.45%
Military Housing	494	0%	.06%	0%	.06%
Mobile Home	68,344	5.79%	2.55%	.02%	8.36%
Other	15,205	.76%	1.08%	.01%	1.86%
Townhouse	15,200	.49%	1.36%	0%	1.86%
Travel Trailer	6,173	.53%	.22%	0%	.76%
Unknown	12	0%	0%	0%	0%
Total	817,398				

Data Source(s): FEMA IA Data



FEMA REAL PROPERTY DAMAGE OWNER OCCUPIED UNITS

COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH SEVERE
Ascension	1,091	990	185	458	62
Assumption	440	380	51	198	16
East Baton Rouge	1,756	1,366	188	652	32
East Feliciana	103	40	4	16	2
Iberia	127	86	22	39	1
Iberville	181	264	32	132	6
Jefferson	5,854	5,747	1,593	3,079	637
Lafourche	806	1,094	794	1,047	412
Livingston	1,650	1,210	293	712	96
Orleans	4,953	4,954	834	2,017	184
Plaquemines	676	483	131	258	78
Pointe Coupee	49	56	8	13	3
St Bernard	782	664	103	293	37
St Charles	783	1,181	481	955	219
St Helena	567	395	69	183	25
St James	442	617	247	544	82
St John the Baptist	745	1,276	1,026	1,417	350
St Martin	79	48	6	29	1
St Mary	275	250	57	126	16
St Tammany	2,726	1,678	395	906	147
Tangipahoa	2,936	2,525	658	1,515	206
Terrebonne	570	867	469	739	285
Washington	633	525	81	235	17
West Baton Rouge	68	71	11	29	3
West Feliciana	22	25	5	11	0



COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH SEVERE
Calcasieu	219	493	28	263	2
Total	28,633	27,285	7,771	15,866	2,919

Data Source(s): FEMA IA Data126

The monetary thresholds are defined in Appendix D.

FEMA REAL PROPERTY DAMAGE RENTAL UNITS

COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
Ascension	1,247	264	111	54	5
Assumption	309	77	35	23	3
East Baton Rouge	6,009	965	487	238	26
East Feliciana	111	1	2	2	0
Iberia	155	29	7	3	0
Iberville	293	104	133	16	4
Jefferson	20,251	3,826	1,905	1,259	200
Lafourche	1,204	352	233	185	15
Livingston	1,298	214	126	39	4
Orleans	25,177	4,572	2,263	1,136	99
Plaquemines	514	123	58	42	8
Pointe Coupee	99	14	17	2	0
St Bernard	1,631	309	157	67	6
St Charles	1,843	499	254	256	34
St Helena	271	27	18	7	0
St James	632	153	90	88	9
St John the Baptist	1,715	731	569	508	171
St Martin	83	25	9	6	0
St. Mary	310	55	33	25	9



COUNTY	UNITS WITH MINOR-LOW	UNITS WITH MINOR-HIGH	UNITS WITH MAJOR-LOW	UNITS WITH MAJOR-HIGH	UNITS WITH SEVERE
St Tammany	3,287	553	351	169	20
Tangipahoa	4,337	1,017	668	328	24
Terrebonne	1,327	377	192	219	31
Washington	851	167	59	24	1
West Baton Rouge	132	18	15	12	1
West Feliciana	22	6	5	1	0
Calcasieu	231	156	4	54	5
Total	73,339	14,634	7,801	4,763	675

Data Source(s): FEMA IA Data

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

The catastrophic winds, torrential rain and flooding of the May 2021 Floods and Hurricane Ida directly impacted several public housing developments in 22 of the most impacted parishes. The largest physical damages are reported at the Houma Public Housing Authority (PHA) (LA090), LaFourche PHA (LA080), Westwego PHA (LA011), Kenner PHA (LA012), and St. Charles PHA (LA094). As of March 3, 2022, damages are estimated at over \$44,925,000 for approximately 1,595 public housing units.

Of the PHAs in the FEMA Presidential Disaster Declaration (PDD) designated localities, 18 of the 50 reported displacements totaling 1,147 PIH assisted families ultimately displaced due to Hurricane Ida. Specifically, 581 public housing assisted households and 566 HCV households were reported displaced at the peak of storm impacts. As of March 2, 2022, 718, approximately 62.6 percent, of the original 1,147 displaced Public and Indian Housing (PIH) families have been rehoused. Of the remaining displacements, it is reported that 355 HCV families and 74 public housing families have been displaced. Accordingly, since rehousing efforts started, approximately 86.9 percent of displaced public housing families and 38.9 percent of displaced HCV families have been rehoused.

Since the hurricane made landfall, six of 18 impacted PHAs with displacements have successfully rehoused all displaced households within their portfolio. All other PHAs are making significant progress as well, with 62.6 percent of families rehoused. PIH continues to closely work with the impacted PHAs to establish permanent rehousing for all displaced families.



2. Public Housing and Affordable Housing

MULTIFAMILY HUD-ASSISTED HOUSING

TYPE OF DAMAGE	# OF PROPERTIES	# OF UNITS	# OF UNITS ASSISTED	# OF UNITS WAITING ASSISTANCE
Minor-Low	0.00	0.00	0.00	0.00
Minor-High	71	9,567	3,318	6,249
Major-Low	15	1,458	633	825
Major-High	0	0	0	0
Severe	23	3,246	1,312	1,934
Total	109	14,271	5,263	9,008

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

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

PUBLIC HOUSING AUTHORITIES DAMAGED

COUNTY	TOTAL # PHAS	TOTAL PHAS DAMAGED	# OF UNITS DAMAGED
All FEMA IA	50	18	1,147
Total	50	18	1,147

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

OWNER WITH UNMET NEED IN A FLOODPLAIN

INCOME CATEGORY	COUNT	# WITHOUT FLOOD INSURANCE	% WITHOUT FLOOD INSURANCE
LMI	39,192	34,189	87%
Non-LMI	8,593	5,597	65%
Unknown	4,015	3,316	83%
Total	51,800	43,102	83%



INSURANCE CLAIMS AND LOSSES IN DISASTER IMPACTED AREAS

COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES (\$)
Ascension	17,007	10,754	170,763,421
Assumption	1,744	1,212	13,376,089
Calcasieu	179	77	2,097,735
East Baton Rouge	19,287	10,018	130,276,068
East Feliciana	535	320	3,024,904
Iberia	166	93	1,975,030
Iberville	838	488	5,202,788
Jefferson	98,912	58,670	1,265,648,773
Lafourche	30,548	20,283	744,260,524
Livingston	14,776	9,799	180,494,581
Orleans	70,443	37,548	789,303,733
Plaquemines	3,792	2,260	53,511,757
Pointe Coupee	151	82	1,354,399
St. Bernard	5,395	2,985	36,787,013
St. Charles	20,619	12,612	515,539,692
St. Helena	743	493	8,064,977
St. James	8,170	5,740	144,512,244
St. John the Baptist	20,510	13,582	468,102,338
St. Martin	58	34	250,213
St. Mary	566	317	3,088,977
St. Tammany	39,571	20,889	334,010,834
Tangipahoa	25,661	16,206	342,003,534
Terrebonne	43,582	28,911	1,054,971,582
Washington	2,480	1,423	19,527,711
West Baton Rouge	408	231	1,942,241
West Feliciana	141	74	567,734
Unknown	6,303	2,931	153,901,310



COUNTY/CITY/ETC.	# OF CLAIMS	# OF CLAIMS RESULTING IN LOSS	DIRECT INCURRED LOSSES (\$)
Total	432,585	258,032	6,444,560,202

Data Source(s): Louisiana Department of Insurance

TOTAL HOME LOANS APPROVED BY SBA

COUNTY	# OF HOME LOANS
Ascension	522
Assumption	64
East Baton Rouge	523
East Feliciana	8
Iberia	1
Iberville	23
Jefferson	6,169
Lafourche	2,060
Livingston	517
Orleans	3,933
Plaquemines	284
Pointe Coupee	6
St Bernard	449
St Charles	1,905
St Helena	43
St James	372
St John the Baptist	1,366
St Mary	17
St Tammany	1,942
Tangipahoa	1,221
Terrebonne	2,730



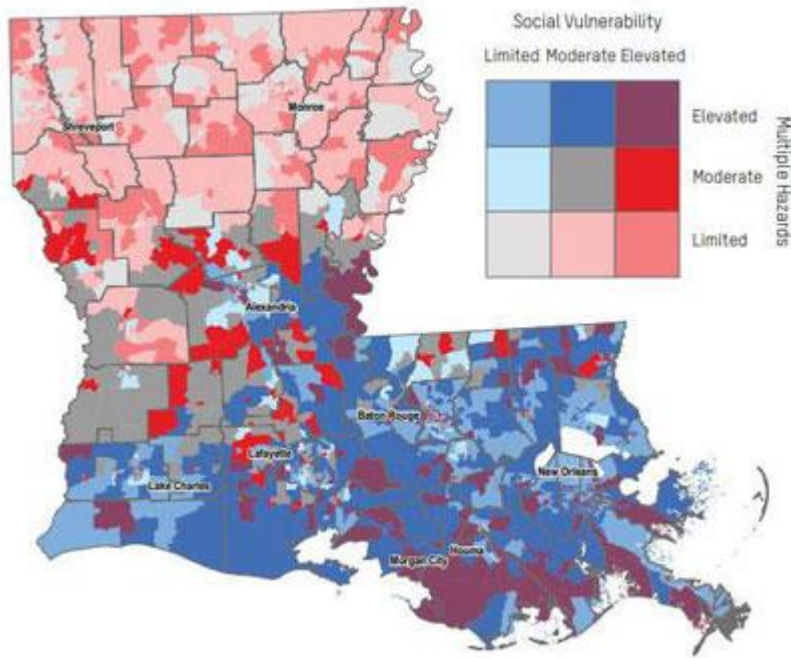
COUNTY	# OF HOME LOANS
Washington	95
West Baton Rouge	22
West Feliciana	1
Total	24,273

Data Source(s): SBA

SOCIAL EQUITY, FAIR HOUSING AND CIVIL RIGHTS

It has long been recognized that storm and flood-related risk often corresponds with a high level of social vulnerability, compounding the impact of flood events with the challenges of poverty for many victims. Louisiana features extensive social vulnerability across the state, as well as extreme exposure to flood, storm, and coastal hazards. Further, many Louisiana residents have experienced multiple flood events, and, therefore, have been repeatedly subjected to interruptions in work when having to rebuild or relocate. This has long-term negative impacts on household wealth, mental health, and community cohesion.¹² Moreover, as illustrated by the Social Vulnerability Index (SoVI®) analysis below, many of Louisiana’s most disaster-prone – and historically impacted – geographies are co-located with pockets of vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity.

¹² Carla Stanke, et al. “The effects of flooding on mental health: Outcomes and recommendations from a review of the literature” PLoS currents vol. 4 e4f9f1fa9c3cae. (2012): doi:10.1371/4f9f1fa9c3cae



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

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

VULNERABLE POPULATIONS

PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
Ascension *	30%	11%	12%	10%	19%	Low
Assumption *	25%	17%	23%	19%	32%	High
Calcasieu *	27%	15%	15%	19%	16%	Low



PARISH	% OF POPULATION YOUNGER THAN 20	% OF POPULATION OLDER THAN 64	% OF POPULATION WITH DISABILITIES	% OF POPULATION LIVING IN POVERTY	% OF HOUSEHOLDS THAT ARE MANUFACTURED HOMES	SVI VULNERABILITY
East Baton Rouge *	26%	14%	15%	18%	3%	Low
East Feliciana	21%	17%	15%	19%	31%	Moderate to High
Iberia	29%	15%	16%	22%	21%	High
Iberville *	23%	15%	20%	19%	20%	Moderate to High
Jefferson *	24%	17%	14%	15%	2%	Low
Lafourche *	26%	15%	17%	18%	16%	Low
Livingston *	28%	13%	13%	12%	24%	Low
Orleans *	23%	14%	14%	24%	1%	High
Plaquemines *	29%	13%	15%	15%	27%	High
Pointe Coupee	24%	20%	27%	20%	24%	Moderate to High
St. Bernard *	29%	11%	18%	19%	6%	High
St. Charles *	27%	13%	12%	11%	9%	Low
St. Helena *	25%	19%	19%	20%	36%	High
St. James *	25%	17%	14%	17%	16%	Low
St. John the Baptist *	27%	14%	13%	16%	13%	High
St. Martin	27%	15%	15%	19%	27%	High
St. Mary *	27%	16%	18%	24%	19%	Moderate to High
St. Tammany *	26%	16%	15%	12%	7%	Low
Tangipahoa *	28%	14%	20%	22%	22%	Moderate to High
Terrebonne *	28%	14%	17%	19%	15%	Moderate to High
Washington *	26%	18%	22%	25%	22%	High
West Baton Rouge *	26%	13%	14%	14%	21%	High



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

* HUD MID parishes

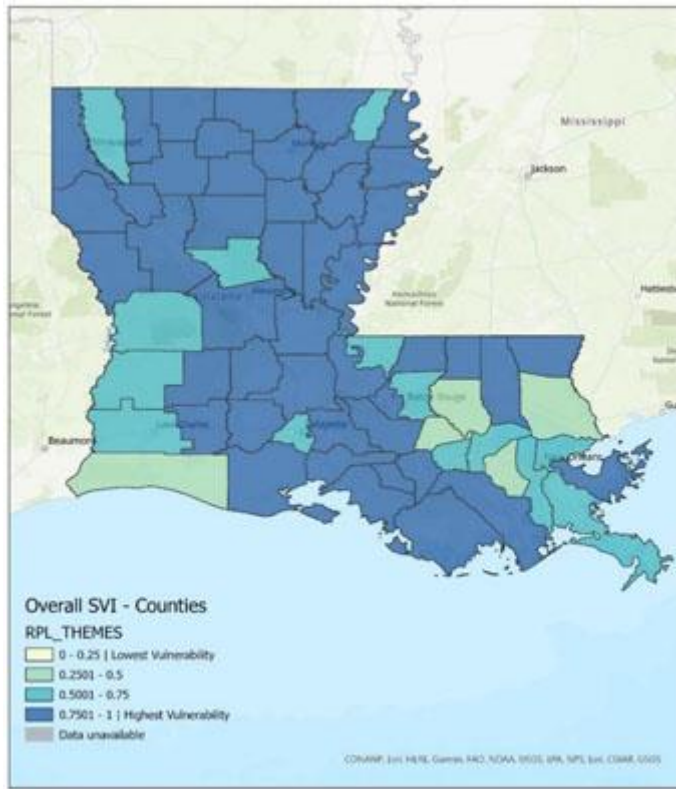
Source: US Census Bureau, American Community Survey and Small Area Income and Poverty Estimates (SAIPE) tool.

SOCIAL VULNERABILITY INDEX

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

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

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



PROTECTED CLASSES

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

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

While the program areas included in this Action Plan do not define eligibility based on protected class status, the state – through its history of disaster-recovery work – has documented correlations between adverse impacts, household income levels, and certain protected classes. Therefore, in prioritizing both disaster risk mitigation and

benefit to low-and moderate-income households, the state reasonably anticipates that program areas outlined in this Action Plan will have a significant positive impact on protected class populations.

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

RACE	% OF HOUSEHOLDS
American Indian/Alaskan Native	0.19%
American Indian/Alaskan Native and Black/African American	0.06%
American Indian/Alaskan Native and White	0.12%
Asian	0.38%
Asian and White	0.04%
Black/African American	52.19%
Black/African American and White	0.86%
Native Hawaiian/Other Pacific Islander	0.12%
Other multi-racial	1.25%
Unknown	31.10%
White	13.69%
Total	100%

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

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

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

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

Further, the environmental review process provides a mechanism to identify environmental conditions impacting the use of property for consideration of means to mitigate adverse impacts or provide alternate assistance in the recovery process.¹³

STATEWIDE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

DEMOGRAPHIC	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Total Population	4,664,362	100%	2,434,578	52%	182,434	4%
Under 5 years	307,435	7%	158,457	52%	11,781	4%
65 years and over	698,018	15%	348,366	50%	28,228	4%
Population with a Disability	695,791	15%	368,208	53%	29,165	4%
White or Caucasian	2,735,887	59%	1,410,208	52%	108,498	4%
Black or African American	1,492,386	32%	805,509	54%	61,399	4%
American Indian and Alaska Native	23,892	1%	13,603	57%	410	2%
Asian	80,014	17%	42,990	54%	2,719	3%

¹³ Carla Stanke, et al. “The effects of flooding on mental health: Outcomes and recommendations from a review of the literature” PLoS currents vol. 4 e4f9f1fa9c3cae. (2012): doi:10.1371/4f9f1fa9c3cae



DEMOGRAPHIC	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Native Hawaiian and Other Pacific Islander	1,088	1%	445	41%	0	0%
Other	82,139	2%	45,105	55%	3,434	4%

Data Source(s): 2019 ACS 5 year

EDUCATION DEMOGRAPHICS

EDUCATION	STATE ESTIMATES	STATE PERCENT	DISASTER DECLARATION ESTIMATE	DISASTER DECLARATION PERCENT	MID ESTIMATES	MID PERCENT
Population 25 and over	3,125,153	100%	1,947,158	62%	123,894	4%
Less than high school graduate	461,706	15%	275,750	60%	23,907	5%
High School graduate or equivalency	1,061,388	34%	628,428	59%	51,813	5%
Some college, associate degree	848,474	27%	533,168	63%	29,713	4%
Bachelor's degree or higher	753,585	24%	509,812	68%	18,461	2%

Data Source(s): 2019 ACS 5 year

INCOME DEMOGRAPHICS

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	COUNTIES IMPACTED BY DISASTER	MIDS
Median Household Income	\$49,469.00	\$42,950.00	\$46,857.00
Per Capita Income	\$27,923	\$27,315	\$25,404
Total			

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



INCOME DEMOGRAPHICS — LOW INCOME

INCOME/ECONOMIC DEMOGRAPHICS	STATEWIDE	COUNTIES IMPACTED BY DISASTER	MIDS
Income in the past 12 months below poverty level	\$0.00	\$0.00	\$0.00
Total			

Data Source(s): OCD

LMI ANALYSIS - STATEWIDE

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

Data Source(s): 5-Year ACS

LMI ANALYSIS- FEDERALLY DECLARED DISASTER AREAS

COUNTY	NON-MID-TOTAL LMI PERSONS	NON-MID-TOTAL POPULATION	NON-MID-PERCENTAGE LMI	MID-TOTAL LMI PERSONS	MID-TOTAL POPULATION	MID-PERCENTAGE LMI
Ascension	7	11	64%	744	864	86%
Assumption	0	0	0%	294	326	90%
East Baton Rouge	271	382	71%	1189	1,257	95%
East Feliciana	26	26	100%	0	0	0%
Iberia	67	72	93%	0	0	0%
Iberville	54	70	77%	151	162	93%
Jefferson	0	0	0%	6,182	8,673	71%
Lafourche	0	0	0%	1,711	2,686	64%
Livingston	0	0	0%	1,111	1,270	87%
Orleans	0	0	0%	5,921	6,533	91%
Plaquemines	0	0	0%	505	575	88%
Pointe Coupee	43	43	100%	0	0	0%



COUNTY	NON-MID-TOTAL LMI PERSONS	NON-MID-TOTAL POPULATION	NON-MID-PERCENTAGE LMI	MID-TOTAL LMI PERSONS	MID-TOTAL POPULATION	MID-PERCENTAGE LMI
St Bernard	0	0	0%	597	663	90%
St Charles	0	0	0%	1,460	2,199	66%
St Helena	0	0	0%	282	302	93%
St James	0	0	0%	875	1,060	83%
St John the Baptist	0	0	0%	2,790	4,041	69%
St Martin	48	51	94%	0	0	0%
St Mary	0	0	0%	252	266	95%
St Tammany	0	0	0%	1,639	1,988	82%
Tangipahoa	0	0	0%	2,925	3,399	86%
Terrebonne	0	0	0%	1,302	1,935	67%
Washington	0	0	0%	358	417	86%
West Baton Rouge	0	0	0%	70	71	99%
West Feliciana	22	22	100%	0	0	0%
Calcasieu	0	0	0%	285	431	66%
Total	538	677		30,643	39,118	

Data Source(s): FEMA IA Data

MOBILE HOUSING UNITS IMPACTED BY DISASTER

COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Ascension	1,701	6%
Assumption	839	3%
Calcasieu	45	0%
East Baton Rouge	493	2%
East Feliciana	126	0%
Iberia	230	1%
Iberville	456	2%



COUNTY	NUMBER OF UNITS	% OF TOTAL UNITS IN COUNTY
Jefferson	1,128	4%
Lafourche	1,791	7%
Livingston	2,970	11%
Orleans	129	0%
Plaquemines	1,389	5%
Pointe Coupee	116	0%
St Bernard	427	2%
St Charles	1,310	5%
St Helena	1,102	4%
St James	978	4%
St John the Baptist	1,241	5%
St Martin	164	1%
St Mary	602	2%
St Tammany	1,698	6%
Tangipahoa	5,390	20%
Terrebonne	1,215	5%
Washington	893	3%
West Baton Rouge	132	0%
West Feliciana	68	0%
Total	26,633	

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

SNAP AND D-SNAP APPLICANTS IMPACTED BY THE DISASTER

COUNTY	# OF SNAP HOUSEHOLDS IMPACTED	# OF SNAP INDIVIDUALS IMPACTED	# OF HOUSEHOLDS ISSUED D-SNAP BENEFITS	# OF INDIVIDUALS ISSUED D-SNAP BENEFITS
Statewide	351,468	726,383	297,960	615,797
Total	351,468	726,383	297,960	615,797

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



LIMITED ENGLISH PROFICIENCY BREAKDOWN

COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Acadia	1,499	1%
Allen	653	1%
Ascension	1,843	1%
Assumption	515	0%
Avoyelles	1,099	1%
Beauregard	393	0%
Bienville	63	0%
Bossier	2,746	2%
Caddo	3,262	3%
Calcasieu	3,455	3%
Caldwell	115	0%
Cameron	97	0%
Catahoula	44	0%
Claiborne	34	0%
Concordia	79	0%
De Soto	310	0%
East Baton Rouge	12,168	10%
East Carroll	25	0%
East Feliciana	18	0%
Evangeline	1,471	1%
Franklin	56	0%
Grant	700	1%
Iberia	2,438	2%
Iberville	226	0%
Jackson	142	0%
Jefferson	33,538	27%
Jefferson Davis	460	0%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Lafayette	7,381	6%
Lafourche	3,832	3%
La Salle	254	0%
Lincoln	1,147	1%
Livingston	1,257	1%
Madison	67	0%
Morehouse	140	0%
Natchitoches	275	0%
Orleans	12,754	10%
Ouachita	941	1%
Plaquemines	683	1%
Pointe Coupee	299	0%
Rapides	2,428	2%
Red River	52	0%
Richland	22	0%
Sabine	198	0%
St. Bernard	1,748	1%
St. Charles	1,029	1%
St. Helena	94	0%
St. James	175	0%
St. John the Baptist	945	1%
St. Landry	2,419	2%
St. Martin	2,245	2%
St. Mary	1,835	1%
St. Tammany	5,217	4%
Tangipahoa	1,725	1%
Tensas	29	0%



COUNTY	ESTIMATE SPEAK ENGLISH LESS THAN 'VERY WELL'	PERCENT SPEAK ENGLISH LESS THAN 'VERY WELL'
Terrebonne	2,870	2%
Union	254	0%
Vermilion	2,348	2%
Vernon	981	1%
Washington	1,011	1%
Webster	252	0%
West Baton Rouge	301	0%
West Carroll	84	0%
West Feliciana	64	0%
Winn	15	0%
Total	124,820	97%

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

LANGUAGES SPOKEN WITHIN STATE

LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Chinese	5	0%	Allen
Chinese	296	0%	Caddo
Chinese	286	0%	Calcasieu
Chinese	742	0%	Lafayette
Chinese	11	0%	Natchitoches
Chinese	214	0%	Ouachita
Chinese	448	0%	Rapides
Chinese	83	0%	Vermilion
Chinese	99	0%	Vernon
French (incl. Patois, Cajun)	6,022	10%	Acadia
French (incl. Patois, Cajun)	936	4%	Allen
French (incl. Patois, Cajun)	202	1%	Beauregard



LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
French (incl. Patois, Cajun)	1,406	1%	Caddo
French (incl. Patois, Cajun)	5,411	3%	Calcasieu
French (incl. Patois, Cajun)	390	6%	Cameron
French (incl. Patois, Cajun)	2,162	7%	Jefferson Davis
French (incl. Patois, Cajun)	15,081	7%	Lafayette
French (incl. Patois, Cajun)	147	0%	Natchitoches
French (incl. Patois, Cajun)	302	0%	Ouachita
French (incl. Patois, Cajun)	1,391	1%	Rapides
French (incl. Patois, Cajun)	5,875	8%	St. Landry
French (incl. Patois, Cajun)	8,026	15%	Vermilion
French (incl. Patois, Cajun)	237	0%	Vernon
Spanish or Spanish Creole	844	1%	Acadia
Spanish or Spanish Creole	913	4%	Allen
Spanish or Spanish Creole	681	2%	Beauregard
Spanish or Spanish Creole	3,979	2%	Caddo
Spanish or Spanish Creole	4,143	2%	Calcasieu
Spanish or Spanish Creole	156	2%	Cameron
Spanish or Spanish Creole	377	1%	Jefferson Davis
Spanish or Spanish Creole	7,944	4%	Lafayette
Spanish or Spanish Creole	336	1%	Natchitoches
Spanish or Spanish Creole	1,909	1%	Ouachita
Spanish or Spanish Creole	2,931	2%	Rapides
Spanish or Spanish Creole	801	1%	St. Landry
Spanish or Spanish Creole	1,116	2%	Vermilion
Spanish or Spanish Creole	2,112	4%	Vernon
Speak only English	50,213	87%	Acadia
Speak only English	21,694	90%	Allen



LANGUAGE SPOKEN	ESTIMATE NUMBER POPULATION	PERCENTAGE OF THE POPULATION	COUNTY
Speak only English	32,431	96%	Beauregard
Speak only English	227,383	96%	Caddo
Speak only English	169,267	93%	Calcasieu
Speak only English	5,776	91%	Cameron
Speak only English	26,616	91%	Jefferson Davis
Speak only English	186,591	87%	Lafayette
Speak only English	35,968	98%	Natchitoches
Speak only English	141,088	97%	Ouachita
Speak only English	116,072	94%	Rapides
Speak only English	69,759	90%	St. Landry
Speak only English	44,338	81%	Vermilion
Speak only English	43,750	92%	Vernon
Vietnamese	45	0%	Allen
Vietnamese	25	0%	Beauregard
Vietnamese	701	0%	Caddo
Vietnamese	647	0%	Calcasieu
Vietnamese	32	0%	Jefferson Davis
Vietnamese	1,274	1%	Lafayette
Vietnamese	221	0%	Ouachita
Vietnamese	380	0%	Rapides
Vietnamese	112	0%	St. Landry
Vietnamese	1,053	1%	Vermilion
Vietnamese	82	0%	Vernon
All other Languages	16,443	1%	n/a
Total	1,269,975	1,378%	

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



AFFECTED CONTINUUM OF CARE ENTITIES

COC NUMBER	COC ENTITY	IMPACTED COUNTY	HOMELESS COUNT
LA-500	Lafayette/Acadiana CoC	Acadia, St. Landry, St. Martin & Vermilion	339
LA-502	Shreveport, Bossier/Northwest Louisiana CoC	Caddo, Bossier	192
LA-503	New Orleans/Jefferson Parish CoC	Jefferson and Orleans Parishes	1,027
LA-505	Monroe/Northeast Louisiana CoC	Jackson, Lincoln, Morehouse, Ouachita & Union Parishes	78
LA-506	Slidell/Southeast Louisiana CoC	Livingston, St. Helena, St. Tammany, Tangipahoa and Washington Parishes	70
LA-507	Alexandria/Central Louisiana CoC	Grant, La Salle, Rapides, Vernon & Winn Parishes	64
LA-509	Louisiana Balance of State CoC	Allen, Ascension, Assumption, Beauregard, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Iberville, Jefferson Davis, Lafourche, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. James, St. John the Baptist, Terrebonne, West Baton Rouge and West Feliciana Parishes	330
Total			2,100

Data Source(s): HUD Exchange

POINT-IN-TIME COUNT - TYPE OF SHELTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
Statewide	1,224	358	518	2,100
FEMA Declared	996	288	482	1,766
MIDs	675	270	482	1,427



SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
---------------	-------------------	----------------------	----------------------	----------------------

Total

Data Source(s): HUD Exchange

POINT-IN-TIME COUNT - IMPACTED BY DISASTER

SCALE OF DATA	EMERGENCY SHELTER	TRANSITIONAL HOUSING	UNSHELTERED HOMELESS	TOTAL KNOWN HOMELESS
---------------	-------------------	----------------------	----------------------	----------------------

Statewide	1224	389	unknown	2061
-----------	------	-----	---------	------

FEMA Declared	1224	234	448	1906
---------------	------	-----	-----	------

MIDs	1219	234	448	1901
------	------	-----	-----	------

Data Source(s): HUD Exchange

HUD ASSISTED HOUSING IMPACTED BY THE DISASTER

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

Ascension	0	0	0	1	0	0
-----------	---	---	---	---	---	---

East Baton Rouge	0	0	0	18	0	0
------------------	---	---	---	----	---	---

Jefferson	0	83	0	374	0	39
-----------	---	----	---	-----	---	----

Lafourche	0	15	0	250	0	5
-----------	---	----	---	-----	---	---

Livingston	0	0	0	1	0	0
------------	---	---	---	---	---	---

Orleans	0	55	0	1,773	0	0
---------	---	----	---	-------	---	---

Plaquemines	0	5	0	0	0	0
-------------	---	---	---	---	---	---

St Bernard	0	0	0	3	0	0
------------	---	---	---	---	---	---

St Charles	0	88	0	60	0	14
------------	---	----	---	----	---	----

St James	0	0	0	44	0	0
----------	---	---	---	----	---	---



COUNTY	TOTAL HOUSING CHOICE VOUCHERS	TOTAL IMPACTED HOUSING CHOICE VOUCHER UNITS	TOTAL LIHTC UNITS	TOTAL IMPACTED LIHTC UNITS	TOTAL PUBLIC HOUSING DWELLING UNITS	TOTAL IMPACTED PUBLIC HOUSING DWELLING UNITS
St John the Baptist	0	20	0	32	0	23
St Mary	0	0	0	1	0	0
St Tammany	0	0	0	41	0	2
Tangipahoa	0	23	0	524	0	0
Terrebonne	0	43	0	239	0	468
Washington	0	0	0	1	0	0
Total	0	332	0	3,362	0	551

Data Source(s): Louisiana Housing Corporation

B. INFRASTRUCTURE UNMET NEED

Disaster Damage and Impacts

STATEWIDE INFRASTRUCTURE DAMAGE & LOSS ASSESSMENT

Since 2000, Louisiana has experienced 33 major disaster declarations, most commonly caused by hurricane and flood events. Even before the hurricanes of 2020 and 2021, Louisiana’s recovery from extensive infrastructure damage from previous disasters was challenging. Unfortunately, extreme weather patterns are becoming more severe due to climate change.

With natural disasters affecting the state’s coastal and inland communities with such frequency, the need to provide communities with stable and resilient infrastructure is paramount in recovery efforts. Hurricane Ida heightened the demand for more mitigation initiatives and more enhanced building construction to help local communities better prepare for and recover from damaging storms.

Louisiana’s development patterns rely on surface transportation, which is subject to flooding during severe weather events. This not only leaves residents stranded and in danger of rising water but also taxes emergency responders’ ability to provide critical safety and security services. Many critical facilities also face significant flood risk inhibiting emergency management procedures and disrupting service continuity after a disaster.

Thus, the need for significant infrastructure improvements through the state's recovery efforts is clearly evidenced by current conditions and past disasters. Louisiana's most recent American Society of Civil Engineers' Report Card indicated a D+ grade for conditions across 11 key infrastructure sectors, suggesting that if improvements are not made to the system, damages from further disasters will be exacerbated for residents, businesses, and communities.

Hurricane Ida, which caused property damage estimated at \$65 billion, was the most expensive natural disaster of 2021. This storm revealed significant vulnerabilities in the state's infrastructure system and electric grid by exposing aging transmission lines and connectivity bottlenecks. The entire power grid collapsed around a 10-parish radius, with residents and businesses waiting weeks for full restoration.

In New Orleans, all eight transmission lines that bring electricity into the city were out of service on Aug. 29, the day Ida made landfall, leading to weeks of power outages. Tower lines collapsed into the Mississippi River, which limited vessel traffic on the river, causing severe congestion and delays. In addition to the damages sustained by utilities systems and the power grid, vegetation and debris deposits in waterways caused drainage problems in the affected areas, especially those areas with pre-existing flooding concerns. Debris accumulation restricted travel on roadways, further hampering rescue operations and delaying recovery efforts.

In Chalmette, a New Orleans Regional Transit Authority ferry broke loose from its mooring. In Bridge City, an Entergy transmission tower collapsed into the Mississippi River. A roadway bridge that connects the cities of Lafitte and Jean Lafitte was damaged after a barge crashed into it as rising tides caused dozens more roads to be submerged underwater. At least four hospitals were damaged, while 39 additional medical facilities were forced to rely on generator power to provide care.

The infrastructure and facility damage from Ida has created recovery voids in several localities, where funding to rebuild medical facilities, schools and community centers is not yet available. When Ida is combined with Hurricanes Laura, Delta and Zeta in 2020, the total infrastructure damage amounts to more than \$2 billion.

FEMA PUBLIC ASSISTANCE

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



HUD uses Louisiana’s non-federal cost-share match requirement for FEMA PA projects in categories C – G (traditionally 25%) as a proxy to determine infrastructure unmet need, since FEMA funds the majority of public infrastructure repairs. However, long-term recovery needs exist beyond the immediate threat to life and direct repair of facilities funded by FEMA PA. These lasting recovery problems can only be addressed with the long-term planning and implementation of projects designed to address these long-term problems.

In assessing unmet need, it is important to consider the additional strain local entities and organizations face when they must reallocate their already limited resources to address immediate recovery needs, as well as the additional costs of safeguarding their infrastructure assets from future disasters.

After a disaster strikes, local parishes and municipalities often have limited capacity and resources for forward-looking investment in the restoration of critical infrastructure. This restoration requires improvements in energy efficiency, modernized IT infrastructure in public facilities, and enhanced mitigation measures to prevent damage from future disasters. These local parishes and municipalities also need support for water management projects, hardening of transportation corridors and other flood-prevention improvements that enhance long-term resilience of local communities.

The program’s narrative describes how preparedness and mitigation measures will be integrated into rebuilding activities for all programs. Additionally, the state will support HUD’s mission to build more resilient communities by employing more forward-thinking decisions in land use, community mitigation measures and disaster-resistant buildings. These measures are built within the program structure and the state will monitor these efforts. This aligns with unmet needs associated with other planned state, local and regional projects.

For DR-4611 (Hurricane Ida), the state’s obligation has been established as 10% of eligible project costs. For DR-4606 (Storms, Tornadoes and Floods of May 2021), the state’s obligation has been established as 10% of eligible project costs.

As of Oct. 10, 2021, \$2.8 billion has been identified in PA need for these two storms. Based on this data, the current unmet need, or PA non-federal cost share, is estimated at \$251 million (\$1 million for May 2021 events and \$250 million for Hurricane Ida). The state will allocate funds to address a portion of this unmet need. The state recognizes the unmet need will steadily increase as project worksheets (PWs) are still being written and cost estimates for eligible permanent work is still being determined. The current unmet need identified in this Action Plan represents the state’s most up-to-date data.



HAZARD MITIGATION GRANT PROGRAM

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

As of Nov. 8, 2021, the state’s required local match obligation for DR-4611 (Hurricane Ida) and DR-4606 (Storms, Tornadoes and Floods of May 2021) has been established as not less than 25% of eligible project costs. Therefore, the state’s unmet need, or HGMP non-federal cost share, is estimated at \$126 million, 15% of IA funds and PA funds.

The Louisiana Watershed Initiative (LWI) represents a state framework to continue planning, coordination and collaboration efforts that advance preparedness and mitigation measures. The goal to reduce or alleviate flood risk across multiple local jurisdictions and enact consistent mitigation standards across five state agencies is a definitive part of the LWI framework for watershed management.

The state will leverage LWI and its existing best practices to enhance FEMA’s HMGP funding of parish hazard mitigation dollars with the aim of focusing on large infrastructure projects that benefit regional watersheds. These may include floodplain restoration and preservation, flood storage, critical facilities and infrastructure flood mitigation, stormwater management and other mitigation activities that benefit targeted areas.

Long-term strategies will continue to be an integral part of the state’s preparedness and mitigation planning. The program’s narrative describes how preparedness and mitigation measures will be integrated into rebuilding activities for both non-federal cost share programs. These measures are built within the FEMA structure and the state will monitor these efforts. This match aligns with the unmet needs associated with other planned state, local and regional projects.

FEMA Public Assistance Program

PA CATEGORY	# DAMAGED SITES	SUM OF APPROX. COST	SUM OF FEDERAL SHARE	SUM OF NON-FEDERAL SHARE
A - Debris	476	475,214,862	443,742,610	31,472,252
B - Emergency Measures	952	1,194,431,986	1,089,600,457	104,831,529
C - Roads and Bridges	61	17,709,279	15,938,351	1,770,928



PA CATEGORY	# DAMAGED SITES	SUM OF APPROX. COST	SUM OF FEDERAL SHARE	SUM OF NON-FEDERAL SHARE
D - Water Control Facilities	61	49,855,528	44,869,975	4,985,553
E - Building and Equipment	1,188	688,888,779	619,999,902	68,888,877
F - Utilities	92	359,949,315	323,954,384	35,994,931
G - Other	200	35,120,530	31,608,477	3,512,053
All Categories	3,030	2,821,170,279	2,569,714,156	251,456,123
TOTAL - without A and B:	1,602	1,151,523,431	1,036,371,089	115,152,342

Data Source(s): GOHSEP

Total Cost and Need by PA Category

PA CATEGORY	ESTIMATED PA COST	10% LOCAL MATCH	15% RESILIENCY	TOTAL NEED (MATCH + RESILIENCY)
A - Debris	\$475,214,862	\$31,472,252	\$71,282,229	\$102,754,481
B - Emergency Measures	\$1,194,431,986	\$104,831,529	\$179,164,798	\$283,996,327
C - Roads and Bridges	\$17,709,279	\$1,770,928	\$2,626,392	\$4,427,320
D - Water Control Facilities	\$49,855,528	\$4,985,553	\$7,478,329	\$12,463,882
E - Building and Equipment	\$688,888,779	\$68,888,877	\$103,333,317	\$172,222,194
F - Utilities	\$359,949,315	\$35,994,931	\$53,992,397	\$89,987,329
G - Other	\$35,120,530	\$3,512,053	\$5,268,079	\$8,780,132
Total	2,821,170,279	251,456,123	423,175,542	674,631,665

Data Source(s): GOHSEP



Approximate Recovery Cost per Agency

AGENCY	APPROXIMATE COST
City or Township Government	\$19,928,213.93
County Government	\$30,378,084.21
Independent School District	\$52,240,978.30
Indian/Native American Tribal Government (Federally Recognized)	\$3,605,000.00
Indian/Native American Tribally Designated Organization	\$
Nonprofit with 501C3 IRS Status	\$53,659,565.31
Nonprofit without 501C3 IRS Status	\$9,339,500.00
Public/Indian Housing Authority	\$1,367,201.39
Public/State Controlled Institution of Higher Education	\$239,133.69
Special District Government	\$26,823,575.19
State Government	\$53,874,871
Total	251,456,123

Data Source(s): GOHSEP

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

PROJECT	COST	FUNDING SOURCE	UNMET NEED (10% LOCAL MATCH)
Statewide	\$505,147,256		\$126,286,814
Total	\$505,147,256		\$126,286,814

Data Source(s): GOHSEP

C. ECONOMIC REVITALIZATION UNMET NEED

Disaster Damage and Impacts

STATEWIDE ECONOMIC DAMAGE & LOSS ASSESSMENT

As Louisiana was recovering from FEMA-declared damage as a result of the 2020 disasters, the state's economy was still rebounding. These events left an indelible mark on Louisiana and have exposed new challenges to the state's approach to flood risk reduction for households and infrastructure. Further, the existing barriers to economic recovery for Louisiana also stemmed from communities and businesses struggling to rebuild in the time of a global pandemic.

Immediately following May 2021 floods and Hurricane Ida, the Louisiana Department of Economic Development (LED) partnered with a private economic consulting group to conduct an assessment of economic damages resulting from these two disaster events. The study conducted by LED for May 2021 floods was not as extensive as the IDA study. Key findings from these assessments follow.

The peak business disruption impacts across Louisiana include:

- May 2021 Flood: 8,186 business operations, over 6% of all businesses in Louisiana
- Ida: 59,345 business operations, over 47% of all businesses in Louisiana

The number of employees impacted at peak of hurricanes includes:

- May 2021 Flood: 106,097
- Ida: 700,461, nearly 42% of all Louisiana workers.

The estimated damages to business total almost \$13B:

- May 2021 Flood: \$33.6 million in structures and equipment
- May 2021 Flood: \$90.6 in interruption loss (lost labor productivity and value added costs.)
- Ida: \$6.8 billion in structural damage;
- Ida: \$2.2 billion in equipment loss;
- Ida: \$3.5 billion in interruption loss (lost labor productivity and value added costs.)

BUSINESS & WAGE LOSSES

The LED-commissioned study for May 2021 Floods measured business losses starting May 17 – May 19, 2021. For Ida the study measured business losses starting two days prior to Hurricane Ida’s landfall, August 27, through September 16, 2021. To illustrate these losses, the study estimated the percent of businesses closed each day during the study period, and based its estimates on publicly known utility outages, local news outlets and local contacts surveying the damage.

For Ida, both business interruption and property damages are informed by the wind speed of the hurricane at various locations. Both the wind model and other computations were also informed by satellite imagery and local inspection of the damages. Interruptions extended beyond the businesses directly impacted by rain and wind due to highway closures, like I-10 among others, that disrupted travel for workers as well as customers. Finally, estimates were adjusted by industry sector to account for the point that some economic sectors may have closed completely while others may have generally continued to operate at close to normal capacity.

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

Hardest Hit Parishes May 2021 Floods: The impact of flooding on business operations varied by parish and industry. The largest impact occurs in East Baton Rouge Parish due to the population size of the parish. As a percent of total businesses and workers, Calcasieu was most effected with 35% of the workforce not working on May 18 due to the flooding event. Statewide, it is estimated that roughly 6% of all workers were off due to the flooding event on the peak day of May 18. In most cases, operations returned to normal on May 19 though some businesses remained closed due to the flooding damages sustained. To get a better measure of the full impact of the event, the study estimated the lost productivity and lost value added due to the flooding for the period of May 17-May 31.

Hardest Hit Parishes Ida: The hardest hit areas primarily due to their concentration of businesses and proximity to Ida’s landfall, Jefferson and Orleans Parishes, had a combined nearly 25,000 businesses and 280,000 employees

impacted. Even though East Baton Rouge Parish was not as near to Ida’s landfall as these other two parishes, the storm’s winds were still hurricane force impacting over 10,000 businesses and over 147,000 employees.

Finally, the LED study provided an economic estimate of damages to business structures and equipment attributable to Hurricane Ida. Business damages to structures and equipment are calculated at the location level utilizing InfoUSA data including latitude and longitude, number of employees, and NAICS code for the parishes that received significant impacts: Lafourche, Terrebonne, Ascension, East Baton Rouge, Jefferson, Livingston, Orleans, Plaquemines, St. Charles, St. John, St. Tammany, and Tangipahoa. The U.S. Bureau of Economic Analysis provides data used to obtain a baseline value of business structures and equipment per employee at the two-digit NAICS industry level. Multiplying these values per employee for the relevant industry by the number of employees at a particular location supplies the baseline estimate of the value of a structure and equipment present at a particular location.

OVERALL, THE IDA MODEL ESTIMATES \$6.8 BILLION IN DAMAGE TO BUSINESS STRUCTURES. THE LARGEST IMPACTS OCCUR FOR JEFFERSON PARISH WITH OVER \$1.8 BILLION, LAFOURCHE \$927.2 MILLION AND TERREBONNE PARISH WITH \$800 MILLION IN DAMAGES. THE MODEL ADDITIONALLY ESTIMATES MORE THAN \$2.2 BILLION IN DAMAGE TO BUSINESS EQUIPMENT. JEFFERSON PARISH REGISTERS THE LARGEST ESTIMATED DAMAGES WITH \$577.2 MILLION.

AGRICULTURAL LOSSES

Based on estimates completed by the LSU AgCenter, the economic impacts from Hurricane Ida on Louisiana’s agricultural sector are estimated to be \$584 million. Timber losses for Hurricane Ida totaled just over a quarter of a million dollars for 125,000 acres in Livingston, St. Charles, and Tangipahoa parishes.

Table below gives the different types of agricultural losses.-

AGRICULTURAL LOSSES

TYPE OF LOSS	IDA	TOTAL
Reduced Production	\$59,792,787	\$59,792,787
Livestock Loss	\$1,558,252	\$1,558,252
Infrastructure Damage	\$207,126,813	\$207,126,813
Timber Losses	\$315,946,540	\$315,946,540
Total Losses	\$584,424,392	\$584,424,392

To date, one primary form of known assistance approved to address the losses described above is assistance through the Small Business Administration’s (SBA) Business Economic Injury Disaster Loan Program. To date, 11,988 loans have been applied for with 1,685 approved for a total of \$105,797,850.

Another significant known source of assistance is Paid/Reserves of Reported claims reported through the Louisiana Department of Insurance (DOI). Business losses with accompanying assistance have been accounted for in calculating approximately \$6.9 billion in economic unmet needs.

SUMMARY OF ECONOMIC UNMET NEEDS

TYPE OF LOSS	TOTAL
Business Structures	\$6,867,000,000
Business Equipment	2,184,200,000
Business Interruption ¹	2,576,400,000
Agriculture/Timber	584,424,392
Business/EIDL Loans	(105,797,850)
Paid/Reserves of Reported Claims	(5,131,748,513)
Total Unmet Needs	6,974,478,029

¹ includes labor productivity and value-added losses

Total Business Loans Approved by the SBA

COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Ascension	n/a	19
Assumption	n/a	4
Calcasieu	n/a	14
East Baton Rouge	n/a	48
Iberia	n/a	1
Iberville	n/a	3
Jefferson	n/a	407
Lafourche	n/a	132
Lafayette	n/a	1



COUNTY	BUSINESS CODE/CATEGORY	BUSINESS/EIDL LOANS
Livingston	n/a	26
Orleans	n/a	456
Plaquemines	n/a	31
St Bernard	n/a	27
St Charles	n/a	79
St Helena	n/a	2
St James	n/a	13
St John the Baptist	n/a	61
St Mary	n/a	3
St Tammany	n/a	93
Tangipahoa	n/a	74
Terrebonne	n/a	180
Washington	n/a	10
West Baton Rouge	n/a	1
Total	n/a	1,685

Data Source(s): SBA

SBA Applicant Breakdown

APPLICATION TYPE	# OF APPLICATIONS	PERCENT
Total Business Applications	11,988	100%
Processed Applications	11,985	99%
In-Process Applications	4	0%
Declined Applications	5,634	47%
Withdrawn Applications	4,194	35%
Approved Applications	1,685	14%

Data Source(s): SBA



Estimating Business Operations Losses

OPERATIONAL LOSS CATEGORY	COUNT OF BUSINESSES WITH VERIFIED LOSSES	AVERAGE VERIFIED LOSS	ESTIMATED ADDITIONAL LOSSES TO BUSINESSES
Furniture			
Machinery	29,673	\$303,904	\$9,017,600,000
Inventory			
Other	29,673	\$137,013	\$4,065,524,392
Total	59,345	220,459	13,083,124,392

Data Source(s): Louisiana Department of Economic Development, Ida

Increased Occupation Demands

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

Data Source(s): Not available

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

D. MITIGATION ONLY ACTIVITIES

The state has conducted a mitigation needs assessment, which is further detailed in the **Preparedness, Mitigation, and Resiliency** section of the Action Plan. The state will be funding the non-federal match for HMGP which is an eligible CDBG-DR activity. All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities such as MIT-Buyout. Also, the state will be including mitigation efforts within both direct allocation program.

3. GENERAL REQUIREMENTS

A. CITIZEN PARTICIPATION

Outreach and Engagement

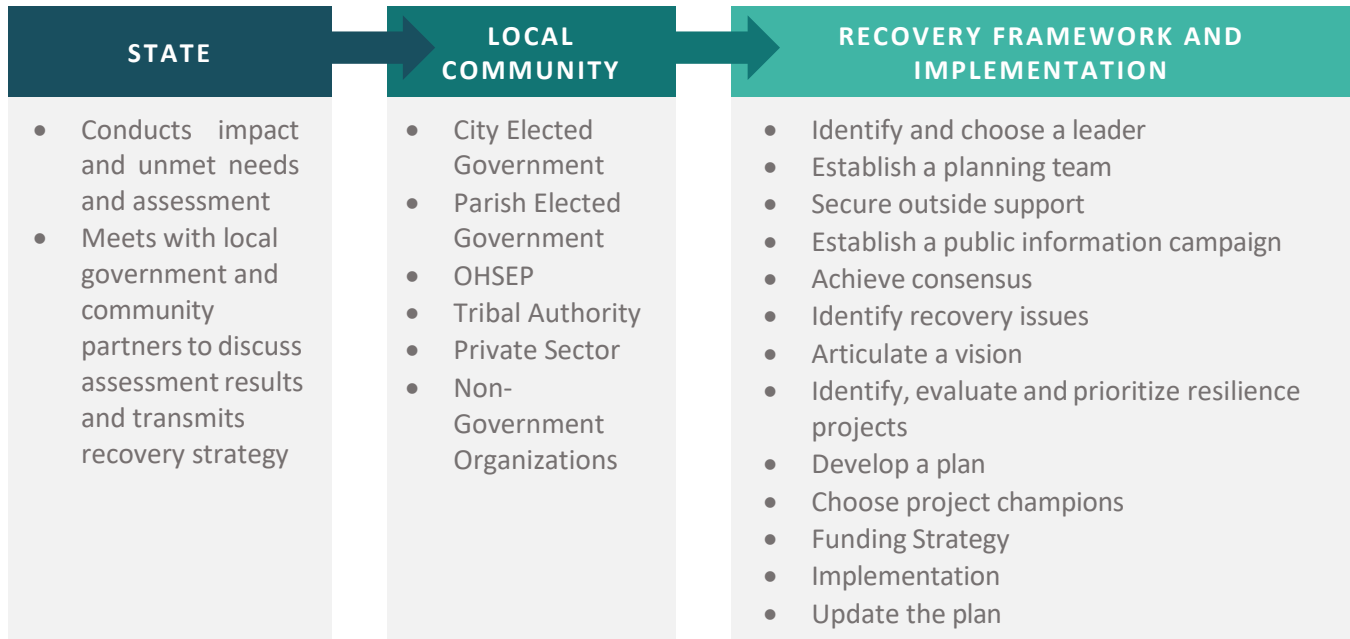
In the development of this disaster recovery Action Plan, *Louisiana Office of Community Development-Disaster Recovery Unit* consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure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

STATE AGENCIES

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

The subcommittee is dedicated to long-term recovery and sustainability and will be a key mechanism in implementing the State Hazard Mitigation Program (SHMP). The subcommittee is aligned with the ESF 14 State of Louisiana Disaster Recovery Framework and FEMA's National Disaster Recovery Framework. During EOC activation, the LTRS is convened alongside the UCG to access recovery needs following a disaster, activate Recovery Support Functions (RSF) for complex recovery issues, and develop post-disaster recovery strategies.

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



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

- Governor's Office of Homeland Security and Emergency Preparedness
- Louisiana Office of Community Development
- Louisiana Department of Agriculture and Forestry, or his designee.
- Louisiana Department of Wildlife and Fisheries, or his designee.
- Lieutenant Governor Office
- Louisiana Department of Children and Family Services
- Louisiana Department of Health
- Louisiana Department of Education
- Department of Transportation and Development
- Louisiana Housing Corporation
- Louisiana Economic Development
- Coastal Protection and Restoration Authority

Mission priorities and tasks to document needs and available resources have included, but are not limited to:

- **RSF 1 – Planning and Capacity** conducted an assessment of local governmental jurisdiction using data available in the public domain and hurricane impact data to determine the level of ability for local jurisdictions

to plan and execute a comprehensive recovery effort, given the existing implications of COVID-19 on local budgets and the economy. This assessment has been vetted and coordinated through focus group meetings in cooperation with state agencies, the Louisiana Municipal Association; the Louisiana Police Jury Association; the State Chapters of the American Planning Association and the American Institute of Architects; the Louisiana Association of Planning Districts; and the eight Watershed Regions and other organizations. Additionally, RSF 1 is participating in the regular monthly meetings of the organizations for mutual updates and further collaboration. This assessment is identifying short- and long-term needs – i.e. staffing and expertise gaps, training and technical assistance needed for broadband and other technology issues, and funding gaps and resources which may be needed to sustain their operations.

- The state and FEMA conducted a new training curriculum - a Just-In-Time (JIT) Training – an ongoing series designed for and targeting local elected officials and their key recovery staff, to assist them in focusing, in real-time, on current issues of response and recovery at various intervals following the disasters. Modules were refined to address specific issues emanating from the disasters based on the type of staff participants and the impacted jurisdictions represented.
- The state’s “Long Term Resilience Planning Guide”, drafted after the 2016 Floods and implemented as a pilot resulting in two “best practices” in planning – the Ouachita Strong and the Denham Strong Plans –is being revised and updated to reflect the flood risk standards subsequently developed by the Watershed Initiative; guidance on planning regionally as opposed to an independent jurisdictional approach; the inclusion of the current mitigation approaches and the use of effective facilitation skills and the use of Zoom and other virtual and social media platforms to ensure inclusiveness in soliciting public input and a partnership with local residents.
- RSF 2 – Economic Development, under the leadership of the Louisiana Economic Development Department activated an emergency contract to assess damages to businesses and the local economy, covering physical damages to business, business interruption, loss of revenues to individual businesses, the agriculture economy, and state parks. This report is being circulated so that local and federal partners can develop appropriate programs and identify financial and technical resources to assist those businesses.
- RSF 3 – Health & Human Services, led by the Louisiana Department of Health, the Department of Children and Family Services, the Governor’s Office of Homeland Security and Emergency Preparedness, in partnership with local VOAD organizations and advocacy groups, developed a matrix of needs, including housing issues, which identified immediate health and emotional issues associated with the trauma of a storm and residential displacement, as well as long term, residual and psychological impacts, particularly in a COVID-19 environment. In addition, the impact of COVID-19 is complicating an already overburdened health care system.

- RSF 4 – Housing – Activated immediately due to the level of residences impacted, the Governor designated the Louisiana Housing Task Force, which was created in 2012 and activated after Hurricane Isaac and the Great Floods of 2016, to function as RSF 4-Housing. This body has been meeting weekly. Under the leadership of the HUD Field Office in New Orleans, HUD is conducting a HUD Housing Assessment through virtual Zoom interviews which will provide more insights into the housing situation on the ground and is inclusive of HUD owned properties, residential homeowners and rental properties and publicly owned properties, both land and facilities, which can be used to develop and expand the availability of affordable housing in the impacted area. Focus groups and targeted outreach in the field included the U.S. Department of the Treasury, the FDIC, local elected officials, local non-profits, local developers and citizens.
- RSF 5 – Infrastructure & RSF 6 – Natural and Cultural Resources – Both RSFs are working with their regional outreach teams in the field and local jurisdictions, in coordination with the FEMA PA team, to identify structural damage to roads, marshes, wetland, state parks, and historical sites.

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

INDIAN TRIBES

The Bayou Lafourche Band, Grand Bayou Indian Village, Grand Caillou/Dulac Band, Jean Charles Choctaw Nation, Pointe-Au-Chien Indian Tribe, and United Houma Nation, all of which fall under the auspices of The Tribal Affairs Office located in the Governor’s Office, were impacted by Hurricane Ida and the May 2021 Floods. As such, OCD held a meeting with tribal leaders on May 16, 2021, in consultation with the Tribal Affairs Office, to include the respective communities’ needs in program budget allocations. Additionally, tribe representatives will be invited to participate in the Action Plan public hearings and meetings held in their respective regions. Additional meetings will be scheduled upon request as necessary. The agenda and meeting minutes will be maintained as official record and as documentation of the consultative process.

Stakeholder Conference Call with Native American Commission and Impacted Tribes: May 16, 2022

Action Plan Briefing and Public Comment with Impacted Tribes: June 29, 2022

Local Governments

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

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



FEDERAL PARTNERS

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

Non-Governmental Organizations (NGOs) and Private Sector

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

Equal Access to Information

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

Telephone, voice: 225-219-9600 or LA Relay Service 711;

Email: ocd@la.gov; or

Mail to: Office of Community Development, Post Office Box 94095 Baton Rouge, LA, 70804-9095.

In addition to the activities above, the Louisiana Office of Community Development-Disaster Recovery Unit has published this action plan on <https://www.doa.la.gov/oa/ocd/> for a 30-day public comment period. Citizens will be notified through earned media as a press release will be sent statewide to all major print and broadcast outlets; stakeholder listservs; and traditional marketing outlets. Louisiana Office of Community Development-Disaster Recovery Unit will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of citizen comments on this Action Plan, along with Louisiana Office of Community Development-Disaster Recovery Unit responses, will be included in **Appendix C** of this document.



For more information, citizens can refer to the [Louisiana Office of Community Development-Disaster Recovery Unit](https://www.doa.la.gov/doa/ocd/) citizen participation plan that can be found at <https://www.doa.la.gov/doa/ocd/>.

Public Hearings

In line with the requirements noted in the Federal Register Notice for grantees receiving greater than \$500 million in CDBG- DR funding, the state is required to convene at least two public hearings in HUD-identified MID to solicit citizen comments. To comply with this requirement and to maximize citizen participation efforts, the state will hold six public hearings in different locations across the HUD-identified MID to provide reasonable opportunity, geographic balance, and maximum accessibility for citizen comment and ongoing citizen access to the use of grant funds. The public hearing dates are scheduled as listed below:

PUBLIC HEARING #	DATE	METHOD	MID LOCATION
Meeting #1	June 20, 2022	In-Person	Terrebonne and Lafourche Parishes
Meeting #2	June 21, 2022	Virtual	Statewide
Meeting #3	June 22, 2022	In-Person	Jefferson Parish
Meeting #4	June 23, 2022	In-Person	Tangipahoa Parish
Meeting #3	June 29, 2022	In-Person	St. John the Baptist and St. Charles Parishes

**Public hearing dates may be subject to change*

The hearings will be held in facilities accessible to persons with disabilities with accommodation to ensure full participation opportunities. The hearings will also be streamed live for citizens to participate remotely, and each session will be recorded, and presentation materials will also be available online for reference. All virtual hearings will allow for real-time questions, with answers coming directly from the attending representatives to all attendees.

In accordance with the Federal Register Notice, the state will implement policies to ensure that all complaints, appeals, and grievances are addressed in a timely manner. For the purpose of this Action Plan, the state has defined complaints and appeals as follows:



Complaints

A complaint is defined as a written or verbal statement or grievance that a situation or behavior is unsatisfactory or unacceptable: (1) A Fair Housing or other discriminatory allegation; (2) An allegation of fraud, waste or abuse; and/or Communication of dissatisfaction of a program and/or personnel.

There are two types of complaints; formal and informal.

- Formal complaints are written statements of grievance, including faxed and emailed statements. A written procedure for dealing with formal complaints is required and will be detailed in program policies.
- Informal complaints may be verbal and can come from any party involved in the application process, including the homeowner or building contractor. A written procedure for handling these complaints is not required.

Citizens will be provided with the address, phone numbers, and times for submitting complaints or grievances. A complaint tracking system will categorize complaints, track the resolution process, and report on complaint status.

Information about the right and how to file a complaint will be printed on all program applications, guidelines, and subrecipient websites in all local languages, as appropriate and reasonable.

Complaints will be handled sensitively and fairly. A thorough review of any applicable program documentation and contractual agreements will be conducted, as well as careful implementation of policies and procedures, and clear and respectful methods of communication will be used to help prevent and resolve complaints. Corrective action is implemented, where warranted and responses to complaints will be provided within fifteen (15) working days within receipt of the complaint.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov) *Louisiana Office of Community Development - Disaster Recovery Unit* will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://www.doa.la.gov/doa/ocd/> to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

APPEALS

An appeal is a written dispute requesting a reversal or revision of a determination that affects eligibility and/or assistance. Appealable decisions may include determinations of eligibility, award amount, inspection results, and funding requirements. Policies that have been approved and incorporated by a program, statutory and regulatory requirements/guidelines may not be appealed.



The state will implement an appeals process for homeowners, rental property owners, and small business owners related to program eligibility and program application process. Details of the point of contact and procedure for submitting the appeal will be detailed in the appropriate program policies and procedures.

B. PUBLIC WEBSITE

Louisiana Office of Community Development - Disaster Recovery Unit will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

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

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

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

C. AMENDMENTS

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

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

Substantial Amendment

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

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

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

Non-Substantial Amendment

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

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

D. DISPLACEMENT OF PERSONS AND OTHER ENTITIES

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

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

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

E. PROTECTION OF PEOPLE AND OTHER ENTITIES

The State of Louisiana intends to promote high quality, durable, energy efficient, sustainable, and mold resistant construction methods in areas impacted by the disaster. All newly constructed buildings must meet all locally adopted building codes, standards, and ordinances. In the absence of locally adopted and enforced building codes, the requirements of the State Building Code will apply. Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

Elevation standards

New construction, repair of substantially damaged structures, or substantial improvement to structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain, requires the structure to be elevated with the lowest floor, including the basement, at least two (2) feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents below two (2) feet above base flood elevation must be elevated or flood proofed up to at least two (2) feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three (3) feet above the 100-year floodplain.

The state will—at a minimum—adhere to the advanced elevation requirements established in section II.B.2.c. of the Federal Register Notice, subtitled “Elevation standards for new construction, reconstruction and rehabilitation of substantial damage, or rehabilitation resulting in substantial improvements.” To this effect, future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations. As applicable and within its policies and procedures on a program- by-program basis, the state or its sub-grantees will document decisions to elevate structures. This documentation

will address how projects will be evaluated and how elevation costs will be reasonably determined relative to other alternatives or strategies, such as the demolition of substantially damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to reduce the risk of loss of life and property.

The average cost to elevate a home can vary significantly and is dependent upon the number of feet it must be elevated, the location of the home, and the square footage of the home. It is estimated that the cost to elevate a home in Louisiana may be between \$30,000 and \$100,000 based on the factors mentioned above. When CDBG-DR funds are used for the non-federal match requirement on Public Assistance projects, the alternative requirements of Section III.F.6 of the Notice will be utilized where allowed by the Notice.

Flood Insurance Requirements

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

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

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

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

Construction Standards

Louisiana Office of Community Development - Disaster Recovery Unit will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy



efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

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

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

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

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

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

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

Contractors Standards

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



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

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

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

Preparedness, Mitigation and Resiliency

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

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

In May 2018, Gov. Edwards issued Executive Order JBE18-16, creating the Council on Watershed Management, which serves as the state’s multi-pronged approach to mitigating future flood risk and expanding resilient development patterns while focusing on natural boundaries. This initiative represents a continuation and



extension of the planning, coordination, and collaboration across various federal, state, and local agencies in direct response to the historic flooding events of March and August 2016.

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

ADDITIONAL CONSIDERATIONS

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

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

Mitigation Needs Assessment

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

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

There have been 90 major disaster declarations in the state of Louisiana since 1954. The most common natural disasters that cause damages to an extent that results in a federal disaster declaration are hurricanes and

flooding. Since 2000, there have been 22 declared flood and hurricane-related disasters¹⁴. This historical pattern of extreme weather is expected to continue and become more severe due to climate change. Based on this, mitigation measures to reduce impacts caused by these types of hazards are critical.

Every parish in the state has been impacted by one or more of these events and has resulted in the devastating loss of life and hardship to Louisiana residents, forcing many to relocate, exhaust their financial assets and undermine the security of living in their homes or investing in their properties or businesses¹⁵.

Repetitive and severe repetitive flood loss properties are particularly costly with claims totaling over \$2 billion in Louisiana since 1978. It is important to note that repetitive flood loss properties represent only 1.3 percent of all flood insurance policies but historically account for nearly one-fourth of the claim payments¹⁶. Mitigating repetitive loss properties in Louisiana and preventing the future accrual of additional repetitive loss properties benefits not only the state of Louisiana but the entire country, by contributing to the stability of the NFIP.

Cost of Disasters

Between 1980 and 2021, 84-billion-dollar disaster events, totaling more than \$940 Billion dollars, a result of 23 Tropical Cyclone, 10 Flooding, 30 Severe Storm, 8 Winter Storm, 12 Drought, and 1 Freeze events, affected Louisiana (CPI-adjusted). Louisiana ranks among the costliest states for weather and climate disasters compared to other states affected by billion-dollar events (this summation does not include losses less than a billion dollars). An overview of Louisiana’s billion-dollar events is provided in the table below¹⁷.

TABLE: BILLION-DOLLAR EVENTS TO AFFECT LOUISIANA FROM 1980 TO 2021 (CPI-ADJUSTED)

DISASTER TYPE	EVENTS	EVENTS/ YEAR	PERCENT FREQUENCY	TOTAL COSTS	PERCENT OF TOTAL COSTS
Tropical Cyclone	23	0.6	28.2%	\$200.0B-\$230.0B [†]	86.7%
Flooding	10	0.2	11.8%	\$10.0B-\$20.0B	7.1%
Severe Storm	30	0.7	35.3%	\$5.0B-\$10.0B	3.7%
Drought	12	0.3	14.1%	\$2.0B-\$5.0B	1.7%

¹⁴ NOAA. *Billion-Dollar Weather and Climate Disasters: Events*.

¹⁵ FEMA. *Disaster Declaration for States and Counties*.

¹⁶ JE Lamond, RD Joseph, and DG Proverbs. “An Exploration of Factors Affecting the Long-Term Psychological Impact and Deterioration of Mental Health in Flooded Households.” *Environmental Research*, July 2015; 140:325-34.

¹⁷ GOHSEP. “*Repetitive Loss Strategy*” (Appendix to the 2019 State of Louisiana Hazard Mitigation Guide).



DISASTER TYPE	EVENTS	EVENTS/ YEAR	PERCENT FREQUENCY	TOTAL COSTS	PERCENT OF TOTAL COSTS
Winter Storm	8	0.2	9.4%	\$1.0B-\$2.0B	0.7%
Freeze	1	0.0	1.2%	\$100M-\$250M	0.1%
All Disasters	84	2.0	100%	\$200.0B-\$270.0B	100.0%

Louisiana is also facing coastal land loss which proposes a risk to businesses, homes, infrastructure as well as larger economic implications due to the state’s importance in shipping, energy production, chemicals, and other sectors. The five most heavily impacted regions in Louisiana are highlighted in the table below. The lost economic assets are heavily concentrated in the coastal regions facing more significant rates of land loss. The business disruption costs are distributed more evenly across the coast¹⁸.

TABLE: THE US TOTAL REPRESENTS THE TOTAL DAMAGES IN BOTH LOUISIANA AND THE COUNTRY FROM LAND LOSS IN LOUISIANA. ALL FIGURES IN 2015 DOLLARS.

REGION	INFRASTRUCTURE REPLACEMENT COSTS	BUSINESS DISRUPTIONS
United States Total	\$3.6 billion	\$7.6 billion
New Orleans	\$1.7 billion	\$1.7 billion
Baton Rouge	\$60 million	\$600 million
Houma	\$1.4 billion	\$1.4 billion
Lafayette	\$140 million	\$390 million
Lake Charles	\$420 million	\$490 million

National Flood Insurance Program

Flooding is a problem for many people across the United States. Enduring the consequences of repetitive flooding can put a strain on residents and on state and local resources. When the water rises, communities face the disruption of life, damaged belongings, and the high cost of rebuilding. FEMA administers the National Flood Insurance Program, which pays flood claims, while also keeping the price of flood insurance at an affordable level.

¹⁸ NOAA. [Billion-Dollar Weather and Climate Disasters: Events](#)



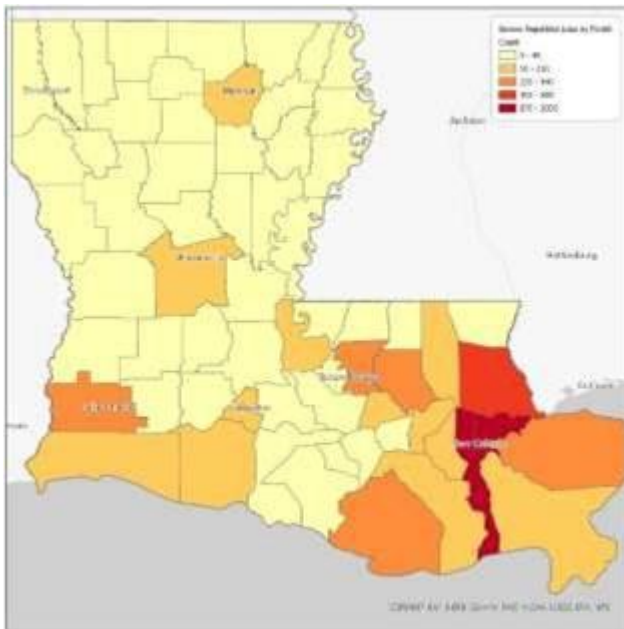
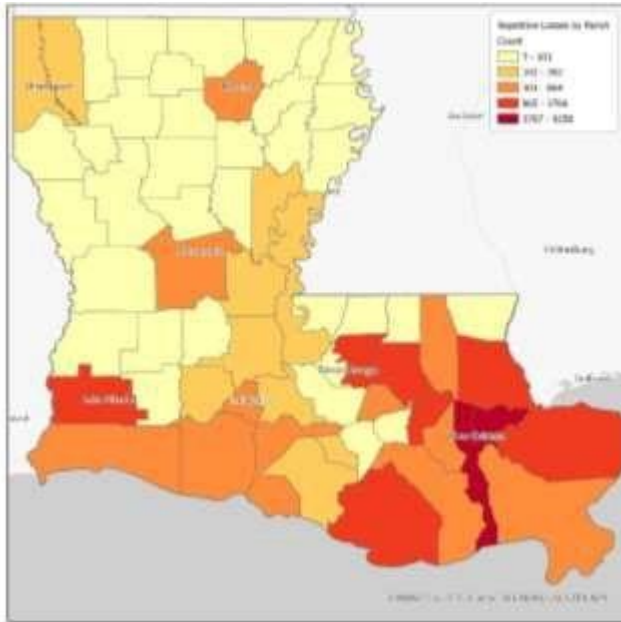
All parishes in the state of Louisiana participate in the NFIP. As of October 2021, there were 507,929 NFIP policies in force across the state.

Repetitive and Severe Repetitive Flood Loss

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

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

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



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

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

Cost of Future Risks

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

Despite the state’s extensive efforts to mitigate flood risks following hurricanes Katrina, Rita, Gustav, Ike, Isaac, and the Great Floods of 2016, as well as through long-term efforts like the Coastal Master Plan, losses attributable to a 1 percent AEP flood event will account for more than one-third of all anticipated disaster losses in 2043¹⁹. Moreover, given the state’s recent history of federally- declared disaster events attributable to a significant flood – many of which were measured to be well in excess of a 1 percent AEP event – this assessment contends the SHMP loss estimate of \$451,389,758 significantly undervalues the state’s long-term flood damage risk.

TABLE: SHMP 2043 PROJECTED ANNUAL LOSSES AS A RESULT

PROJECTED AVERAGE ANNUAL LOSS IN 2043	BUILDING AVERAGE ANNUAL LOSS	CROP AVERAGE ANNUAL LOSS	TOTAL AVERAGE ANNUAL LOSS
Wind	\$642,927,351		\$642,927,351
Flood	\$451,389,758		\$451,389,758 - 1% AEP
Expansive Soil	\$92,869,675		\$92,869,675
Drought	\$-	\$52,795,132	\$52,795,132
Extreme cold	\$36,978,826	\$1,155,889	\$38,134,715
Tornado	\$31,725,662	\$281,804	\$32,007,466

¹⁹ LSU, Economics & Policy Research Group. [Regional Impacts of Coastal Land Loss and Louisiana’s Opportunity for Growth](#)



PROJECTED AVERAGE ANNUAL LOSS IN 2043	BUILDING AVERAGE ANNUAL LOSS	CROP AVERAGE ANNUAL LOSS	TOTAL AVERAGE ANNUAL LOSS
Wildfire	\$5,876,211		\$5,876,211
Lightning	\$2,917,407	\$3,483	\$2,920,890
Hail	\$1,976,212	\$110,057	\$2,086,269
Dam Failure	\$1,011,414		\$1,011,414
Extreme Heat	\$-	\$744,345	\$744,345
Sinkhole	\$342,071		\$342,071

⁶ Ibid.

Greatest Risk Hazards

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

Hurricanes/Tropical Cyclones

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

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

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

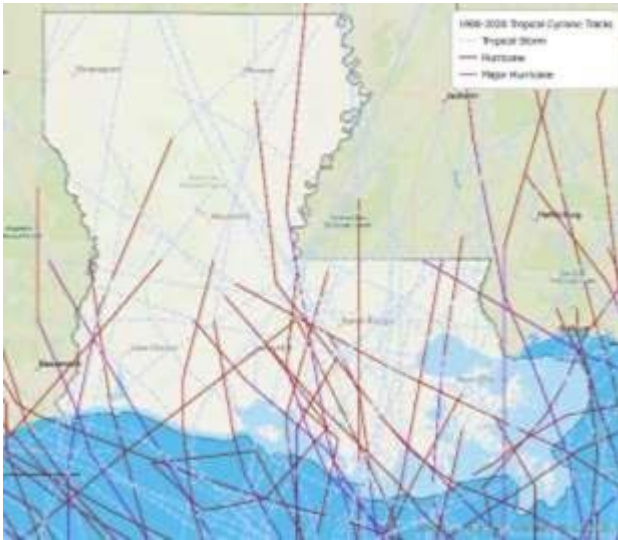


Figure: Tropical Cyclone Tracks Across Louisiana (1900-2020)

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

Floods

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

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

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

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



Figure: 100-Year Flood Inundation Area in Louisiana

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

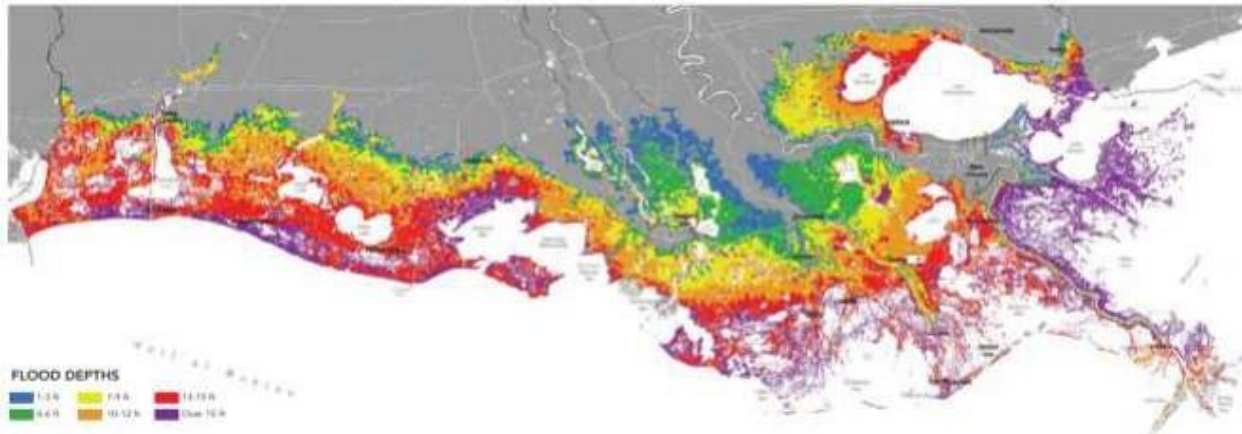


Figure: 2067 Predicted Future Risk from a 100-Year Flood Event with No Additional Action

Source: http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Book_Final-with-Effective-Date-06092017.pdf

Sea Level Rise

Due to a variety of factors including eustatic sea-level rise, subsidence, and coastal land loss, Louisiana has one of the highest sea-level rise rates in the world²⁰. This steadily increasing threat further exacerbates flood risk within the state, as it multiplies the potential impacts of any isolated flood event and contributes to an ever-worsening baseline state of flood risk exposure²¹.

As sea-level rise impacts the coastal areas of Louisiana, it also weakens the existing network of wetlands, barrier islands, and brackish estuaries that provide critical storm protection and flood retention natural functions to more inland portions of the state. The figure below indicates potential flood risk as a result of sea-level rise projected in 2067 if the state were to take no action.

Some of Louisiana's recent mitigation efforts (namely LA SAFE and actions of the CPRA) have identified inland migration and the restoration of coastal areas as methods to address the insidious threat of sea-level rise; however, increasing sea-level rise will continue to present a threat to Louisiana, especially as it exacerbates flood risk.

²⁰ LA GOHSEP, 2019. "Repetitive Loss Strategy" – Appendix to the 2019 State of Louisiana Hazard Mitigation Plan Update.

²¹ GOHSEP, 2018. Hazard Identification and Risk Assessment.

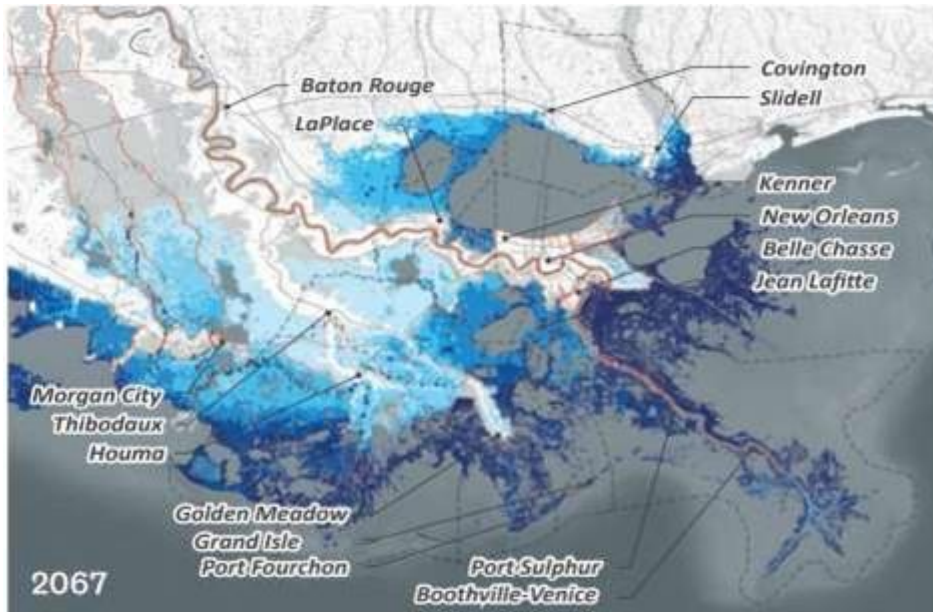


Figure: 2067 Coastal Flood Risk Projections (No Action)

Source: <https://s3.amazonaws.com/lasafe/Final+Adaptation+Strategies/Regional+Adaptation+Strategy.pdf>

Extreme Precipitation

Extreme precipitation precedes flash flooding, which is a critical component of Louisiana’s risk profile²² and can occur with little warning, exhausting municipal resources and causing repeated property damage and business interruption.

Louisiana experiences some of the highest rainfall rates in the country on an average statewide basis, with a high degree of spatial variability²³, with some areas in the state reaching as high as 70- inches of mean annual rainfall. Even in drought or La Niña conditions,

Louisiana is often subject to high water levels in its major riverine systems, due to flooding conditions upstream in the Midwest²⁴ that can pose an elevated threat when combined with extreme precipitation or wind events.

²² Footnote GOHSEP. *State of Louisiana Hazard Mitigation Guide*. 2019

²³ Linda Benedict and John M. ‘Jay’ Grimes, III. “*Precipitation Patterns Over the Bayou State*.” 11/30/2011.

²⁴ R. Frankson, K. Kunkel, and S. Champion. *Louisiana State Climate Summary*. NOAA Technical Report NESDIS 149-LA, 4 (2017)

Because of its flat landscape and interconnected waterways, the impact of a rainfall event in one part of the state can be greatly felt far beyond the boundaries of where the rain falls.



Figure: Louisiana Average Annual Rainfall Distribution

Louisiana has experienced a number of historic storms and rainfall events with high damage levels in the past two decades, but these events are not outliers from a historical perspective. In fact, such events may speak to existing trends in rainfall data and flood risk. Since 1958, the amount of precipitation falling during heavy rainstorms has increased by 27 percent in the southeast, and the trend toward increasingly heavy and frequent rainstorms, including a significant increase in extreme precipitation events, is projected to continue with high confidence²⁵. Moreover, the amount of rainfall in the Midwest is also likely to increase, which could worsen flooding in Louisiana, as most of the Midwest drains into the Mississippi River.

Broadband Infrastructure in Housing

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

²⁵ United States Global Change Research Program. *Climate Science Special Report: Fourth National Climate Assessment, Volume*



- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible;
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Any new construction or substantial rehabilitation of a building with more than four rental units must include installation of broadband infrastructure, with the following exceptions:

- The location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible;
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of a program or activity or in an undue financial burden; or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

The state will require the review for the feasibility of implementing the requisite broadband infrastructure in the plans and specifications approval process and will perform on-site inspections during construction and post construction to ensure compliance, where applicable.

Cost-Effectiveness

The state's policies and procedures will address the assessment of cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation, reconstruction program, or activity funded with CDBG-DR funds. Policies and procedures will also address possible alternatives if not cost-effective – for example, reconstruction and elevation if the cost of repair exceeds a specified threshold. Similarly, the policies and procedures will address provisions required by the Notice, such as "not suitable for rehabilitation" in connection with the waiver of one for one replacement obligations and definition of "demonstrable hardship."

The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as, reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

All exceptions to maximum award limitations are subject to grant fund availability.

Duplication of Benefits

Summary: The purpose of this policy is to define the Duplication of Benefits Policy LOCD will follow in the administration of Federal grants.

Applicable Laws: The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding make certain that no “person, business concern, or other entity” will receive duplicative assistance⁽¹⁾. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, grantees cannot comply with the Stafford Act without first completing a duplication of benefits (DOB) analysis specific to each applicant.

A DOB occurs when:

- A beneficiary receives assistance, and
- The assistance is from multiple sources, and
- The assistance amount exceeds the need for a particular recovery purpose.

In response to multiple natural disasters over several years, the State of Louisiana received supplemental disaster recovery assistance through HUD’s Community Development Block Grant (CDBG) Program. This assistance is intended to supplement—not replace—other public, private, and nonprofit sector resources that have already been provided for the same need or loss and are legally required to constitute a duplicative source of financial assistance.

For example, if a family’s damaged home costs \$100,000 to repair and the homeowner received insurance proceeds in that amount, the homeowner could not also receive federal disaster recovery funds to repair the home. Grantees should assure that each program provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met by funds that have already been paid, or will be paid, from another source.

The purpose of this document is to outline how the Louisiana Office of Community Development (LOCD) assures that all applications for assistance from the programs it funds—as well as all projects implemented by LOCD grantees, contractors, and subrecipients—will be reviewed for possible duplication of benefits. The procedures described below are also applicable to all LOCD grantees and subrecipients and must be incorporated in the design and administration of programs/projects undertaken by them. This document details LOCD’s general

Duplication of Benefits policy. Individual programs may be subject to program specific policies implementing additional Duplication of Benefits requirements or processes, subject to this overarching policy.

The LOCD Program Manager for is responsible for ensuring that the steps below are performed using the best reasonably available data from the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), the National Flood Insurance Program (NFIP), insurers, and other sources of assistance to verify all reasonably identifiable sources of recovery assistance received by or available to the applicant prior to any award.

The first step of the DOB determination (calculation) is to determine the amount of assistance needed and the amount of funds previously received—or to be received—for a particular disaster recovery activity. This is accomplished by first determining the applicant’s post-storm disaster need prior to the receipt or potential receipt of other funds. Next, all other sources of recovery assistance received, or available to be received, must be disclosed during the application process and verified where reasonably possible. Other sources of funds can include but are not limited to: private insurance; the Federal Emergency Management Agency (FEMA); the Small Business Administration (SBA); the National Flood Insurance Program (NFIP); local and state funds; other federal programs; and private and nonprofit organizations. Whether the assistance constitutes a duplicative source can be affected by the use for which it was provided and specific exemptions that may be provided by law, regulation, or waiver, such as provided in the Disaster Recovery Reform Act, Public Law 115-254, which impacts SBA loans for certain presidentially declared disasters.

The next step is to identify assistance that is not available for the activity. This consists of: funds received that are not for the same purpose as the CDBG activity(s); funds not available to the applicant (e.g., forced mortgage payoff, contractor fraud, etc.); funds from unsubsidized private loans (forgivable loans are duplicative); and any other asset or line of credit available to the applicant, such as checking and savings accounts, stocks, etc. These funds are not considered to be duplicative and may be excluded and not deducted as a duplication of benefit. Finally, after subtracting from the proposed activity cost the duplicate funds received or available to receive, the maximum CDBG award is calculated.

Once the maximum CDBG award has been determined, applicants will be required to sign an agreement—either included in a grant/subrecipient agreement or a separate subrogation instrument—requiring them to return to LOCD^[2] any assistance received for the same purpose as the CDBG disaster recovery funds. This agreement is to be monitored by LOCD program staff, grantees, and subrecipients at least annually for three years. Unless an additional need is established, disaster recovery funds should be recaptured to the extent that they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.



The following is an example of the described process steps for DOB determination:

1.	Identify the Applicant’s Total Need Prior to Any Assistance	\$100,000
2.	Identify All Potential Duplicative Assistance.....	\$35,000
3.	Deduct Assistance Determined to be Duplicative	\$30,000
4.	Maximum Eligible Award (Item 1 less Item 3)	\$70,000
5.	Program Cap (if applicable).....	\$50,000
6.	Final Award (lesser of Items 4 and 5).....	\$50,000

UNMET NEEDS

Disaster recovery assistance needs are calculated at one point in time. As a result, subsequent circumstances may occur that affect the need. If after the assistance has been calculated and/or a CDBG award has been made, an applicant can demonstrate a change in circumstances, the award calculation may be subsequently reevaluated to take the increased need into consideration. Such changes in circumstance include vandalism, contractor fraud, an increase in the cost of materials and/labor, a change in local zoning laws or building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be done before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired).

The federal regulation pertaining to this LOCD policy and procedure for identifying Duplication of Benefits is found in 76FR 71060, November 16, 2011—as modified by 4 84 FR 28836 and 28848 June 20, 2019—which should be reviewed as part of determining Duplication of Benefits. Caution should be utilized in determining the applicability of those notices to the appropriations funding the specific program based on the specific temporal restrictions reflected in those notices.

MONITORING FOR DOB

The process for identifying and then monitoring for DOB begins with the review of each grant application—whether it is for a specific project or an individual beneficiary of disaster recovery CDBG funds. An applicant must provide detailed information about other sources of funds that were received—or that may be received—related to the activity for which CDBG funds are being requested. LOCD or contracted program management staff review and verify the other funds to determine if they are for the same activity and exceed the need for recovery assistance. Once CDBG funds are awarded (minus any determined to be a DOB), applicants are required to notify LOCD of the receipt of any additional funds received for the same activity. Program staff reviews individual pay requests and project amendments to determine if other funds have been received that represent a DOB. In the



event that additional funds are determined to be a DOB, funds will be withheld from future pay requests, and the approved project budget will be amended. In the event that all funds have been expended and a DOB is identified, the applicant will be required to repay the funds to LOCD for return to the U.S. Treasury.

Monitoring for DOB will also be incorporated into LOCD monitoring policies and procedures.

4. GRANTEE PROPOSED USE OF FUNDS

OVERVIEW

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

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

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

The largest portion of funding has been allocated to assist impacted homeowners and renters through programs that address disaster impacts and affordable housing, as these were the largest needs identified in the unmet needs assessment. Hurricane Ida caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state's review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than \$1.4 billion. The need for safe, decent, and affordable housing is the state's top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described above. Approximately 70 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as provide affordable rental housing for persons displaced by the storm.

All of the affordable housing construction programs will include mitigation efforts as well as some specific mitigation only activities to ensure compliance with the minimum 15% mitigation funding. In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses, provide for non-federal match for both FEMA PA and HMGP and allocate funds directly to the most impacted areas. This is necessary to support a more robust recovery effort. Failing to address these additional



needs would neglect the interdependent nature of Louisiana’s disaster affected communities. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure and planning programs.

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

The state will dedicate this allocation of \$1.272 billion to address identified unmet needs as outlined above. Of this, \$380 million will be dedicated to meet the unmet housing needs, including rehabilitation of owner-occupied households \$487 million will be dedicated repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$120 million dedicated to assist small businesses impacted by these disasters. The state will dedicate \$232 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements as well as a direct allocation and economic revitalization to the most impacted areas.

As required by the Federal Register Notice, the state will spend 80 percent of the overall grant on activities undertaken in the HUD-identified “most impacted and distressed” (MID) areas. There are 26 HUD-identified MID areas for Hurricanes Ida and the May 2021 Floods. However, the state may determine to make the remaining funds available for eligible program activities in all disaster-impacted parishes. Additionally, the state will spend no less than 70 percent of funds allocated on activities that benefit low- and moderate-income (LMI) households. The affordable housing construction programs and match programs will include mitigation efforts as well as CDBG-MIT activities to ensure the state complies with the 15% mitigation requirement.

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



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

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

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

HOUSING

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

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

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

- Neighborhood Landlord Rental Program



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

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

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

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

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

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

The following are ineligible activities:

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

ECONOMIC REVITALIZATION

The state has allocated funds to support economic revitalization in areas impacted from Hurricane Ida and the May 2021 Floods through a suite of programs described below. The state understands that residential communities cannot fully recover and thrive without businesses returning to the community, as they provide essential services and employment to local residents. It is imperative that the state invest in those businesses that support recovering neighborhoods, provide local employment opportunities and produce the goods consumed directly or indirectly by local residents. In order to ensure these businesses remain viable and resilient in the face of future disasters, the state may provide technical assistance and mitigation support to the impacted businesses, which may include but not be limited to: training to develop a business continuity plan or institute better recordkeeping, accounting and inventory practices; resources to assess flood risk for the business location; information on securing generator hookups and other similar measures. The state has prioritized businesses that experienced physical or financial losses as a result of the disaster and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

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

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



- Ensure the financial assistance invested in these programs is sound and secure through the provision of technical assistance to eligible businesses.
- Provide assistance to commercial areas to ensure that commercial tenants, customers and jobs are restored

INFRASTRUCTURE

Investments in infrastructure repair and rebuilding in areas impacted by Hurricane Ida helps to secure investments in housing recovery and bolsters confidence in communities continuing to rebuild. Without assistance to meet the state and local match requirements, the infrastructure and resources typically provided by state and local governments will be severely at-risk, as the state and local governments will be required to either a) forgo assistance from FEMA PA or b) divert funding needed for other community needs toward meeting the match requirements. The state will dedicate funds to offset the burden of the non-federal share match requirements faced by state and local entities and jurisdictions. The state will also allocate funds directly to the most damaged areas to address unmet needs not eligible for the FEMA programs.

PLANNING

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



Program Budget

	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$425,000,000.00	\$340,000,000.00	\$85,000,000.00	33.40%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Buyout	\$30,000,000.00	\$24,000,000.00	\$6,000,000.00	2.36%	\$250,000.00	Low- and moderate-income or Urgent Need	0
	New Construction	\$402,873,287.00	\$322,298,629.60	\$80,574,657.40	31.66%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00	0.79%	\$0.00	Low- and moderate-income or Urgent Need	0
ECONOMIC REVITALIZATION	Workforce Training	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Business Grants	\$45,695,232.00	\$36,556,185.60	\$9,139,046.40	3.59%	\$150,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$75,000,000.00	\$75,000,000.00	\$0.00	5.89%	\$0.00	Low- and moderate-income, elimination of slum/blight or Urgent Need	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Health Facilities	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
	Other	\$232,883,641.00	\$196,306,912.14	\$36,576,728.86	18.30%	\$28,000,000.00	Low- and moderate-income, elimination of slum/blight or Urgent Need	0
PUBLIC	Legal Services	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Housing Counseling	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00	0	0
ADMIN	Admin	\$49,893,840.00	\$39,915,072.00	\$9,978,768.00	3.92%	\$0.00	Low- and moderate-income or Urgent Need	0
PLANNING	Planning	\$1,000,000.00	\$800,000.00	\$200,000.00	0.08%	\$0.00	Low- and moderate-income or Urgent Need	0
TOTAL		\$1,272,346,000.00	\$1,042,876,800.00	\$229,469,200.00	100.00			

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

Connection to Unmet Needs

As required by the FR-6326-N-01, *Louisiana Office of Community Development - Disaster Recovery Unit* will allocate at least 80 percent of the funds to address unmet needs in HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a presidential major disaster declaration for Hurricanes Ida and the May 2021 Floods.

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

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



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

Leveraging Funds

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

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

OTHER SOURCES OF FUNDS

Housing

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

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

Economic Development

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



Infrastructure

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

Mitigation

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

<https://watershed.la.gov/action-plan>.

Distribution of Funds

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

CONNECTION TO UNMET NEEDS

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

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



As required by the Federal Register, the state will spend 80 percent of the overall grant on activities undertaken in the HUD-identified “most impacted and distressed” area. There are 22 HUD-identified most impacted and distressed areas for Hurricane Ida and the May Flood. However, the state may determine to make the remaining funds available for eligible program activities in all disaster-impacted parishes.

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

Hurricane Ida caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state’s review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than \$510 million. The need for safe, decent, and affordable housing is the state’s top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described above. Approximately 70 percent of the programmatic funding from the allocation of CDBG-DR funds is dedicated to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as providing affordable rental housing for persons displaced by the storm. In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses, commercial areas and provide for a non-federal match for both FEMA PA and HMGP. If additional funds are available, the state will look to implement additional economic revitalization, infrastructure, and planning programs.

The state will dedicate this allocation of \$1.272 billion to address identified unmet needs as outlined above. Of this, \$380 million will be dedicated to meet the unmet housing needs, including rehabilitation of owner-occupied households \$487 million will be dedicated to repair and increase of the stock of affordable rental housing for impacted renters. Economic recovery will be supported by \$120 million dedicated to assisting small businesses impacted by these disasters. The state will dedicate \$232 million to address unmet needs for both FEMA PA and HMGP non-federal match requirements as well as a direct allocation and economic revitalization to the most impacted areas.

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



Program Income

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

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

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

PROGRAM INCOME DEPOSITED IN THE REVOLVING LOAN FUND

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

PROGRAM INCOME USED TO REDUCE THE NEXT PROGRAM DRAW

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

Pre-Agreement Cost

OCD has incurred and plans to incur additional pre-agreement costs and will seek reimbursement for these costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of OCD used for the planning of the CDBG-DR programs. Other pre-agreement costs, which OCD will fund with this grant, could include activity delivery and project costs associated with eligible disaster recovery programs identified within this Action Plan.

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

Resale or Recapture

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

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

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

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

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

A. PROGRAM DETAILS

Housing Programs

FLOOD INSURANCE PROGRAM

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

Narratives

Program Description

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

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

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

Program Tieback to Disaster/Unmet Needs

This program is only available to applicants who sustained damage to their home as a result of Hurricane Ida and/or the May 2021 Severe Storms and are determined eligible for the RLHP.



How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

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

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

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

Additional eligibility requirements are as follows:



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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not Applicable.

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



INTERIM HOUSING ASSISTANCE

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$3,000,000.00	\$2,400,000.00	\$600,000.00

Narratives

Program Description

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

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

Program Tieback to Disaster/Unmet Needs

Serving low-income families in the process of home rehabilitation or reconstruction as impacted from damages by Hurricane Ida and/or the May 2021 Severe Storms through the RLHP.

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

National Objective: Benefits to low to moderate income persons.



Program Eligibility

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

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

Eligible Applicants, Criteria for Selection and Method of Distribution:

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

Program Responsible Entity

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

Program Maximum Assistance

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



Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



MIDDLE-MARKET LOAN PROGRAM (MMLP)

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

Narratives

Program Description

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

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Minimum 20 years

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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



Program Eligibility

Eligible activity:

- Acquisition of Real Property, HCDA Sections 105 (a)(1)
- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)
- New Housing Construction Waiver, as identified in Federal Register Docket No. 6326- N-1

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

Program Responsible Entity

Administering Entity - State of Louisiana

Program Maximum Assistance

\$6 Million

Program Competitive Application Overview (if applicable)

Funds will be awarded through a competitive Notice of Funding Availability (NOFA) process. Eligible applicants may be prioritized based on experience developing or rehabilitating multi-family buildings, and resilient/sustainable construction. Each project will be reviewed for affordable housing outcomes, financial feasibility and cost reasonableness.

Program Method of Distribution Description/Overview (if applicable)

The MMLP program will award funding to eligible applicants in the form of gap financing loans to support the construction or rehabilitation of affordable housing units. At least 51 percent of those created or preserved units must be made affordable to households earning up to 80 percent AMI for a minimum of 20 years.

Eligible projects may include unrestricted units to offset the cost of units for LMI households, and occupancy of those units by households earning greater than 80 percent of AMI is not prohibited.



LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



NEIGHBORHOOD LANDLORD RENTAL PROGRAM

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

Narratives

Program Description

The Neighborhood Landlord Rental Program will offer funding for applicants to rehabilitate existing housing units or construct new affordable housing units. NLRP will also revitalize communities impacted by Hurricane Ida and/or the May 2021 Severe Storms by reducing the blight of damaged properties as it redevelops them into affordable rental housing.

Program Tieback to Disaster/Unmet Needs

The Neighborhood Landlord Rental Program assists landlords with loans for rehabilitation or reconstruction of damaged rental properties as a direct result of Hurricane Ida and/or the May 2021 Severe Storms. In addition, new construction to increase affordable housing is permitted.

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

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

Program Definition of Second Home/Eligibility

None

Program National Objective(s)

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

Program Eligibility

Eligible activity:



- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing), HCDA Section 105(a)(4)
- New Housing Construction Waiver, as identified in Federal Register No. 6326-N-01

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

- Awards will be made to qualified applicants based on the score during the competitive round of funding and thereafter upon submission of eligible, completed applications.
- Specific scoring criteria will be outlined in the program guidelines.
- Applicants must own the unit and have clear title to the property for which they are applying at the time of application.
- Each project will be reviewed for ownership, title issues, duplication of benefits, financial feasibility, and cost reasonableness.
- Applications must be for only one property; however, developers may submit multiple applications.
- Properties must be located outside of a Special Flood Hazard Area (SFHA).
- Preference will be given to for-profit applicants that were property owners at the time of the hurricanes. Applicants who acquired property after Hurricanes Ida and/or the May 2021 Severe Storms are also eligible to apply but the applicant must have acquired the property by the time of application. Prior to the application period, the state will conduct outreach and education events for potential applicants. Potential applicants are not required to participate in these events to apply to the program, but it is strongly recommended.



Program Method of Distribution Description/Overview (if applicable)

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

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



PERMANENT SUPPORTIVE HOUSING PROGRAM (PSHP)

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$6,000,000.00	\$4,800,000.00	\$1,200,000.00

Narratives

Program Description

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

PSHP achieves these outcomes in two ways:

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

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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



Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

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

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

Program Responsible Entity

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

Program Maximum Assistance

Maximum award: \$5,000 per year

Program Competitive Application Overview (if applicable)

Not applicable.



Program Method of Distribution Description/Overview (if applicable)

Funding will be through payment to service providers through presentation by landlord of vouchers or by direct reimbursement to landlords, as per program policies.

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



RAPID REHOUSING PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

The Rapid Rehousing Program provides rental assistance and supportive services to households displaced by Hurricane Ida and/or the May 2021 Severe Storms at risk of becoming homeless.

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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



Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

Eligible Applicants:

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



RESILIENT MIXED INCOME GAP FUNDING PROGRAM (PRIME)

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$407,873,287	\$326,298,629.60	\$81,574,657.40

Narratives

Program Description

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

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

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

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

Program Tieback to Disaster/Unmet Needs

Provides affordable multifamily rental developments which addresses the current lack of affordable rental units as a direct and indirect result of Hurricane Ida and/or the May 2021 Severe Storms.

How Program will Promote Housing for Vulnerable Populations

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



Program Affordability Period (if applicable)

Minimum 20 years

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

Program Responsible Entity

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

Program Maximum Assistance

\$150,000 per unit, with no award exceeding \$15 million.

Program Competitive Application Overview (if applicable)

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



LOUISIANA
Office of
COMMUNITY
DEVELOPMENT

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



RESTORE LOUISIANA HOMEOWNER PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$380,000,000.00	\$304,000,000.00	\$76,000,000.00

Narratives

Program Description

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

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

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

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

The following are ineligible activities:

- Forced mortgage payoffs

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

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

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

Program Tieback to Disaster/Unmet Needs


The Restore Louisiana Homeowner Program assists homeowners with grants to provide assistance to homes that were damaged or destroyed as a direct result of Hurricane Ida and/or the May 2021 Severe Storms.

How Program will Promote Housing for Vulnerable Populations

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

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



 <p>RESTORE LOUISIANA Homeowner Assistance Program</p>	<p>Based on current funding limitations and federal guidance, to be placed in a phase, you must have:</p> <p>(1) owned and still own the damaged home (2) occupied the home at the time of the disaster (3) sustained major/severe damage (per FEMA) (4) NOT received or expect to receive structural insurance payments greater than \$25k</p>
--	--

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

AMI = AREA MEDIAN INCOME

Program Affordability Period (if applicable)

Not applicable in a Homeowner Program

Program Definition of Second Home/Eligibility

Second Homes are not eligible in the Restore Homeowner Program. Only homes damaged by the allocated disasters which served as the primary residence of the homeowner are considered for eligibility.

Program National Objective(s)

National Objective: Benefits to Low- and moderate-income persons/households or Urgent need.

The Restore Louisiana Homeowner program assists homeowner who are LMI as a priority. However, the State recognizes many homeowners significantly impacted by a disaster may not have been LMI, but are at risk of becoming so following the disaster. Some homeowners still have unmet needs that are best served using the Urgent Need national objective. In the midst of the Nation’s COVID 19 Pandemic it is urgent to consider the goal for homeowners who recover to expeditiously move back into their single-family homes. Not using the urgent need national objective creates great risk of health and welfare of these communities. There is an increased risk of homelessness. Additionally, homeowners whose only choice is to shelter with friends and other family members only increases the potential risk of exposure to this deadly COVID virus. In order for the economy to recovery and for the overall welfare of the community, housing recovery must be the priority for all impacted families. There is a sense of urgency to complete stronger and more resilient homes to protect the communities



against future storms. As Louisiana enters the 2022 hurricane season, it is both critical and urgent to ensure families have the resources necessary to recover, rebuild and reside in their homes preventing the need for concurrent sheltering that could result from another impending disaster. The quicker these programs have the ability to serve the community, the greater the mitigation from future disasters, along with reducing the risk of exacerbating community health and welfare issues.

Program Eligibility

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

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

- Owner-occupant at time of disaster event
- Damaged property address was the applicant’s primary residence at the time of disaster event
- Located in one of FEMA IA declared parishes for Hurricane Ida and/or the May 2021 Severe Storms
- Sustained damage as a result of any of the declared disasters
- Eligible structure as determined by program, including but not limited to, single family residences, duplexes, mobile homes, and resilient manufactured (modular) housing units.

Program Responsible Entity

Administering Entity – State of Louisiana

Program Maximum Assistance

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

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Managed (Solution 1): The state manages and completes the construction process for the rehabilitation or reconstruction of damaged homes on behalf of homeowners. The state will contract with a pool of contractors and assign them to repair or reconstruct damaged properties in a resilient manner. The state will require contractors to provide Solution 1 grantees with a one-year warranty on construction. Notifications reminding homeowners of the expiration date of the warranty will be sent to homeowners.

Homeowner Contracted Program (Solution 2): Homeowners choose to manage their own rehabilitation or reconstruction process with the state providing construction advisory services for all homeowners in this track. Homeowners will select their own home building contractor(s) and contract directly with homebuilding contractors to rebuild in a resilient manner as well as enter a grant agreement with the state for the CDBG-DR funding. The state will monitor all projects in the Homeowner Contracted Program.

Reimbursement (Solution 3): Homeowners who have completed partial or full repairs to their home before applying to the program may be eligible for reimbursement of eligible expenses incurred prior to application to the program.

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028

How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)

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



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

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



SOFT SECOND MORTGAGE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

How Program will Promote Housing for Vulnerable Populations

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

Program Affordability Period (if applicable)

Not applicable

Program Definition of Second Home/Eligibility

Not applicable

Program National Objective(s)

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

Program Eligibility

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



Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR-4611) and May 2021 Severe Storms (DR-4606)

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

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

Program Responsible Entity

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

Program Maximum Assistance

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

Program Competitive Application Overview (if applicable)

Not applicable

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028



Infrastructure Programs

HMGP GLOBAL MATCH PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$42,095,605	\$33,676,484.00	\$8,419,121.00

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

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

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

How Will Program Advance Long-Term Resilience

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

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

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

Program National Objective(s)

Benefit to low- and moderate-income persons or households



Program Eligibility

Non-federal share 105(a)(9)

Program Responsible Entity

State of Louisiana or its subrecipient(s).

Program Maximum Assistance

The maximum award is \$15,000,000

Program Competitive Application Overview (if applicable)

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

Program Method of Distribution Description/Overview (if applicable)

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

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028

Other Program Details

This program will only fund hazard mitigation projects are intended to *strengthen facilities and communities*, making them *less vulnerable* to *future* disaster impacts.

Examples of typical mitigation activities are listed below.

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

- Localized **drainage** improvements – *reduce* **localized** flooding by *increasing* drainage capacity.
- **Safe room** construction – provides *immediate* near **life-safety protection** for either tornado or hurricane winds.

Wind retrofit of structures – hardening the **envelope** of a structure to protect against **high wind loads**. The envelope is the **shell** of the structure (including the doors, roof covering windows and walls) that maintains a dry, heated or cooled **indoor** environment.

How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)

FEMA’s Hazard Mitigation Grant Program [through the Governor’s Office of Homeland Security and Emergency Preparedness (GOHSEP)] provides funds to implement hazard mitigation measures following a Presidentially declared disaster. Hazard mitigation actions under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is meeting the same definition.

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

FEMA’s Hazard Mitigation Grant Program provides funding to state, local, tribal and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in their communities. Eligible activities under this program are any action taken to reduce or eliminate the long-term risks to people and property from future hazards. By providing a global match to this program, the state is addressing the same risks.



NONFEDERAL SHARE MATCH PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$140,788,036	\$112,630,428.00	\$28,157,607.00

Narratives

Program Description

Investments in infrastructure repair and rebuilding in areas impacted by Hurricane Ida and/or the May 2021 Severe Storms helps to secure investments in housing recovery and bolsters confidence in communities continuing to rebuild. Without assistance to meet the state and local match requirements, the infrastructure and resources typically provided by state and local governments will be severely at-risk, as the state and local governments will be required to either a) forgo assistance from FEMA PA or b) divert funding needed for other community needs toward meeting the match requirements. The state will dedicate funds to offset the burden of the non-federal share match requirements faced by state and local entities and jurisdictions.

Program Tieback to Disaster/Unmet Needs

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

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

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

How Will Program Advance Long-Term Resilience

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

Program National Objective(s)

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



Each project worksheet will be reviewed to determine national objective. As discussed in the infrastructure unmet needs, some projects within the Public Assistance program will have had a particular urgency, including existing conditions posing a serious and immediate threat to the health and welfare of the community.

Program Eligibility

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

Program Responsible Entity

State of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award is \$15,000,000

Program Competitive Application Overview (if applicable)

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

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028

Other Program Details

Eligible Applicants include, but are not limited to, the following entities:

- Parish and municipal governments
- State agencies and authorities
- Schools (K-12) and Universities
- First responders



- Critical infrastructure facilities as defined by FEMA (wastewater and drinking facilities)
- Public Housing Authorities

Other parish and local program applicants eligible to receive federal recovery funds, including eligible private non-profit organizations.

The program policies and procedures may include further project selections and priorities due to funding availability including, but not limited to:

- Most Impacted
- Low-Income Area populations and underserved communities
- Geographical considerations

RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$50,000,000.00	50,000,000.00	\$0.00

Narratives

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance

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

Each eligible activity application will be required to describe sustainable practices focusing on reducing runoff and improving water quality, including mitigation of future flood risk.

How Will Program Advance Long-Term Resilience

The program will require mitigation components to be included within the scope(s) of awarded projects in order to advance long-term resilience.

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

Program National Objective(s)

- Benefit to low- and moderate-income persons or households
- Elimination of slums and blight



Program Eligibility

Program Eligible Activities:

105(a) 1-5, 7-9, 11-12, 16

Eligible Applicants:

Units of general local government (UGLG)

Program Responsible Entity

The state of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the being and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

The program policies and procedures may include further project selections and priorities including, but not limited to:

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)



Economic Revitalization Programs

SMALL BUSINESS LOAN AND GRANT PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$45,695,232.00	\$36,556,186.00	\$9,139,046.00

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

Program National Objective(s)

- Low Mod Job Creation or Retention Activities
- Low Mod Area Benefit
- Low Mod Limited Clientele

Program Eligibility

Program Eligible Activities:

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

Eligible Applicants:

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



Program Responsible Entity

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

Program Maximum Assistance

The program will provide standard awards of a maximum of \$150,000, with exceptions allowing for up to a maximum award of \$250,000.

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

Program Competitive Application Overview (if applicable)

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

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

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

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

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



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

Criteria for Selection:

The program will prioritize assistance to businesses that:

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



HOMETOWN REVITALIZATION PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DF-22-0001	\$75,000,000.00	\$75,000,000.00	\$0.00

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MIDs impacted by the disaster. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

Program National Objective(s)

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

Program Eligibility

Program Eligible Activities:

105(a) 8, 12, 14-15, 17, 19, 21-22

Eligible Applicants:

Units of general local government (UGLG)



Program Responsible Entity

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

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

The program policies and procedures may include further project selections and priorities including, but not limited to:

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)

Uses of funds may include, but may not be limited to:

- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Façade improvements to private or public structures in commercial areas.

5. APPENDIX

A. CERTIFICATIONS

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - i. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).



- ii. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
- iii. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.
- iv. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. The grantee certifies that it will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
- j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - i. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - ii. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- k. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.



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

B. WAIVERS

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

1. 42 USC 5304(D)(3) ONE FOR ONE REPLACEMENT

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

Generally, the one-for-one replacement requirements of 42 USC 5304(d)(3) and 24 CFR 42.375 are designed to prevent the net reduction of affordable housing units in a community in order to avoid the unintentional displacement of residents with a low-to-moderate income due to unavailability of affordable units.

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

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



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

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

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

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

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

2. CLARIFICATION/MODIFICATION OF LACK OF FLOOD INSURANCE PENALTY OF CONSOLIDATED NOTICE SECTION IV.E.2.B

The Consolidated Notice, at Section IV.E.2.b., imposes a prohibition on the reconstruction or rehabilitation of a home in a floodplain if the homeowner did not have a flood insurance policy in effect and the household income is above 120% AMI. A reasonable interpretation of this section is the implied conclusion that the damage to the home was the result of flood waters for which the flood policy could provide coverage. The limitation would not apply to a home that sustained wind or other damage not the result of flooding.

The state has responded affirmatively to the form certifications provided by HUD with respect to this limitation but notes here the state's interpretation of the limitation and associated certification. If HUD has a different interpretation, the state asks that HUD clarify the provision. If HUD's interpretation is that the limitation should apply regardless of the cause of damage to the home, the state requests that HUD modify the provision to limit its application to flood damage.

3. EXTENSION OF TENANT-BASED RENTAL ASSISTANCE

The State of Louisiana is requesting a waiver of 42 U.S.C. 5305(a) in order to provide tenant-based rental assistance to households impacted by the disaster to the extent necessary to make eligible rental assistance and utility payments paid for up to 2 years on behalf of homeless and at-risk households when such assistance or payments are part of a homeless prevention or rapid rehousing program or activity, as well as for interim housing for grant recipients during the repair or reconstruction of their homes. While existing CDBG regulations may allow payments for these purposes, grantees under the annual CDBG programs are subject to a much shorter time limitation (3 months).

This waiver will assist individuals and families – both those already receiving rental assistance as well as those who will receive rental assistance subsequently - to maintain stable, permanent housing and help them return to their hometowns as desired when additional permanent housing is available or when their homes have been restored.

It will also provide additional time to stabilize individuals and families in permanent housing where rents are higher than is typical for the area and vacancy rates are extraordinarily low while damaged homes continue to be repaired.

Based on the experience in prior disaster recovery programs, the state submits this extended time frame is to meet the ongoing needs resulting from the storms.

4. WAIVER OF 70 PERCENT OVERALL BENEFIT FOR LOW- AND MODERATE-INCOME (LMI) PERSONS/FAMILIES

The State of Louisiana is requesting a waiver of 42 U.S.C. 5305(a) in order to provide tenant-based rental assistance to households impacted by the disaster to the extent necessary to make eligible rental assistance and utility payments paid for up to 2 years on behalf of homeless and at-risk households when such assistance or payments are part of a homeless prevention or rapid rehousing program or activity, as well as for interim housing for grant recipients during the repair or reconstruction of their homes. While existing CDBG regulations may allow payments for these purposes, grantees under the annual CDBG programs are subject to a much shorter time limitation (3 months).

5. REIMBURSEMENT FOR NEW CONSTRUCTION

The Federal Register Notice authorizes reimbursement for a number of eligible activities but did not include New Construction as one of those activities for which the state could issue payments in reimbursement of costs incurred prior to the grant.

Louisiana's CDBG-DR programs have included successful multifamily affordable housing programs where CDBG DR funds provided gap financing. These programs were initiated following the traditional processes of appropriation, allocation, approval of action plans, and initiation of loan offering processes. The result is a significant passage of time between a disaster event and the commencement of construction. The development often includes new construction.

The State, working with stakeholders in the affordable housing industry, is eager to create a framework that would allow efforts to create new affordable housing to be initiated as quickly as possible following a presidentially declared disaster. While an appropriation of CDBG-DR funds is never a certainty, the goal would be for bridge financing of construction activities to allow the creation of affordable housing to commence, to then be replaced with a permanent loan of CDBG-DR funds once available.

To maximize this effort, it is important that the ability to reimburse pre-award activities to include new construction. The State suggests that this alternative process could include the steps involved in environmental reviews prior to commencement of construction, to be formalized by a notice of release of funds once the CDBG-DR funds are ultimately available to the state.

6. REIMBURSEMENT PERIOD FROM DATE OF DECLARED DISASTER PRIOR THROUGH DATE OF APPLICATION TO STATE

Given the passage of time between the occurrence of hurricanes Laura and Delta and the allocation of CDBG-DR funds to the State of Louisiana in connection with that event, Louisiana Requests that the reimbursement period be extended through one year following the grant agreement to be entered between HUD and the State of Louisiana.

7. GUIDANCE REGARDING DAVIS BACON FOR ELIGIBLE PROJECTS COMMENCED PRIOR TO CDBG-DR AVAILABILITY

While HUD does not have the authority to waive requirements related to Davis Bacon, the State does seek HUD's assistance in securing guidance from the U.S. Department of Labor as obtained in previous programs. The State's Laura Delta Action Plan submitted includes a program utilizing CDBG-DR as a match for other sources that do not require compliance with Davis Bacon, with many projects already underway or even completed prior to the availability of CDBG-DR funds. In the past, HUD has, at Louisiana's request, addressed this issue with the U.S. Department Labor, which has issued guidance on the implementation of Davis Bacon under such circumstances. The Department of Labor issued such guidance by letter dated February 1, 2018, directed to Mr. Stanley Gimont, Deputy Assistant Director for Grant Programs, which agreed to a prospective application of Davis Bacon. Because that correspondence was specific to the 2017 grant issued by HUD to Louisiana for the 2016 Floods, out of an abundance of caution the State requests similar guidance relative to Hurricanes Laura and Delta. As a preemptive matter, the State also requests that the guidance also include similar programs which it anticipates will be submitted in a forthcoming action plan for Hurricane Ida.

C. SUMMARY AND RESPONSE OF PUBLIC COMMENTS

The public comment period initially began on June 1, 2022 and ended on July 1, 2022. The plan had modifications to include HUD's announcement of additional funding and change in MID's for Hurricane Laura and Delta. Additionally this amendment includes unmet needs assessment, program descriptions, and budgets for Hurricane Ida and the May floods of 2021. After the public comment period ended, the state prepared responses to the comments. A summary of the comments and responses were added to the Action Plan for submittal to HUD as an attachment in the supporting document section. Additionally, these comments and responses were posted publicly on the OCD website. The comments and responses can be found under supporting documents titled: APA1_Public Comments_Compiled_LDIDAMay21.

D. DATA SOURCES/METHODOLOGIES

E. IMPORTANT DEFINITIONS AND TERMS

- **AMI:** Area Median Income
- **CBDO:** Community Based Development Organization CDBG: Community Development Block Grant
- **CDBG-DR:** Community Development Block Grant- Disaster Recovery CFR: Code of Federal Regulations
- **CO:** Certifying Officer CP: Participation
- **DOB:** Duplication of Benefits
- **DRGR:** Disaster Recovery and Grant Reporting System FEMA: Federal Emergency Management Agency
- **HCD Act:** Housing and Community Development Act of 1974, as amended HMGP: Hazard Mitigation Grant Program
- **IA:** (FEMA) Individual Assistance LIHTC: Low-Income Housing Tax Credit LMI: Low and moderate-income
- **NFIP:** National Flood Insurance Program PA: (FEMA) Public Assistance
- **RE:** Responsible Entity RFP: Request for Proposals
- **SBA:** U.S. Small Business Administration SFHA: Special Flood Hazard Area UGLG: Unit of general local government
- **URA:** Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended USACE: U.S. Army Corps of Engineers

OCD COMMON ACRONYMS

- **ABFE** Advisory Base Flood Elevation
- **AEP** Annual Exceedance Probability (of a flood)
- **AP** Action Plan
- **CDBG-MIT** Community Development Block Grant-Mitigation
- **CFR** Code of Federal Regulations
- **COVID-19** Coronavirus 2019 global pandemic
- **CPD** HUD Office of Community Planning and Development
- **CPRA** Coastal Protection and Restoration Authority DEQ Louisiana Department of Environmental Quality DOA Division of Administration
- **DOTD** Louisiana Department of Transportation and Development
- **DR** Disaster Recovery
- **FIRM** Flood Insurance Rate Maps



- **FRN** Federal Register Notice
- **GOHSEP** Governor’s Office of Homeland Security and Emergency Preparedness
- **HUD** U.S. Department of Housing and Urban Development
- **LED** Louisiana Economic Development
- **LDAF** Louisiana Department of Agriculture and Forestry **LDWF** Louisiana Department of Wildlife and Fisheries **LSU** Louisiana State University
- **LTRS** Long-Term Recovery Subcommittee **NDRF** National Disaster Recovery Framework **NFIP** National Flood Insurance Program **NOFA** Notice of Funding Availability
- **OCD** Louisiana Office of Community Development
- **QPR** Quarterly Performance Reports **RSF** Recovery Support Function **SHMP** State Hazard Mitigation Plan **USDA** U.S. Department of Agriculture

F. STANDARD FORM 424

6. ATTACHMENTS

I. OCD DISASTER OUTREACH MEETINGS, 2022

Hurricane Ida Disasters Outreach Meetings

DATE	HOST	ATTENDEES	PURPOSE
January 11, 2022	RSF1 OCD/FEMA State Library/Baton Rouge	Government officials of Terrebonne, East Feliciana, Ascension, and St. James parishes	Session 2: Just-in-Time Recovery Training
January 13, 2022	RSF1 OCD/FEMA Regional Planning Commission New Orleans	Government officials of Plaquemines, St. Bernard, and Jefferson parishes; South Central Planning Commission, Regional Planning Commission, City of Bogalusa, Tribal Councils	Session 2: Just-in-Time Recovery Training
January 14, 2022	RSF1 OCD/FEMA Tangipahoa Parish	Mayor's representative, EOC director	Training available
January 18, 2022	RSF1 OCD/FEMA Town of Westwego	Mayor Robert Billiot	Scoping meeting response/recovery
January 18, 2022	RSF1 OCD/FEMA St. Bernard Parish	Parish president, Director of All South Consulting Engineers	Types of recovery strategies to consider
January 19, 2022	RSF1 OCD/FEMA City of Gretna	Major Belinda Constant	Coordination state for response/recovery
January 19, 2022	RSF1 OCD/FEMA Plaquemines Parish	Parish president, EOC Director	Exploratory meeting needs/support available
January 26, 2022	RSF1 OCD/GOHSEP/FEMA	Acadiana, Capital Area, South Central Planning, Metro Area/Orleans Regional Planning Commissions	Roundtable discussion community impact and organizational capacity needs as a result of Ida



February 3, 2022	RSF1 OCD/FEMA Bayou Community Foundation/Houma	Foundation Director, South Central Planning Commission, Terrebonne and Lafourche Parishes, OCD, and FEMA	Planning discussion for developing long-term regional plan for Terrebonne, Lafourche, and Grand Isle
February 8, 2022 and February 24, 2022	RSF 1 OCD/GOHSEP/FEMA Town of Grand Isle	Mayor David Camardelle, Jefferson Parish Environmental Staff, City Council Representatives, Local Engineers, U.S. Army Corps of Engineers	Urgency of debris removal of vessels from waterways, funding, permits, funding available for long-term recovery
February 9, 2022 and March 15, 2022	RSF 1 OCD/FEMA City of Kenner	EOC Director, Dept. of Community Development	Assess emergency management/recovery capabilities
February 10, 2022, March 7, 2022, and March 10, 2022	RSF1 OCD/FEMA Town of Jean LaFitte	Mayor Timothy Kerner Jr. CFM manager, capital Projects Director, GOSHEP	Coordination, state/local capacity building for recovery, financial assistance
February 22, 2022	RSF 1 OCD/FEMA Crown Plaza Hotel Baton Rouge	Louisiana Municipal Association Mid-Year Conference by invitation/Outreach/TA of attending 200+ Mayors/Elected Officials	Information/TA by OCD and FEMA on Laura and Ida recovery support
March 8, 2022	RSF 1 OCD/FEMA/EDA Harahan/Jefferson Parish	Government officials of Terrebonne, St. Charles, Assumption, Lafourche parishes; Sheriff's Office/Terrebonne; Representative for State Representative for District 20	Session 3: Just-Time Recovery Training
March 28, 2022	RSF1 OCD/FEMA Lafourche Parish	Kristi Lumpkin, Director of Planning	Long-term recovery planning and support; database of businesses; housing issues



April 5, 2022	RSF 1 OCD/FEMA/GOHSEP EOC Terrebonne Parish	Government officials of Terrebonne, St. Charles, Assumption, Lafourche parishes; Sheriff’s Office/Terrebonne; Representative for State Representative for District 20	Session 3: Just-Time Recovery Training
April 6, 2022	RSF 1 OCD/FEMA/GOHSEP Council Chambers St. Tammany Parish	Government officials for Jefferson, Plaquemines, St. Bernard, City of Westwego, St. Tammany, Washington, Ascension parishes, City of Kenner, West Bank Business Association	Session 3: Just-Time Recovery Training
April 12, 2022, and April 19, 2022	RSF 1 OCD/FEMA	Parish, municipal, tribal communities	Survey of Ida/Laura impacted communities – i.e. government, tribal, et. Al organizations of specific grants and grants management training in response to an identified need from all Ida impacted communities
April 18, 2022	RSF 1 OCD/FEMA/GOHSEP Jefferson Parish EOC in Harahan	Parish President, CAO & other executive staff members; Mayors of Westwego and Harahan; EOC	Briefing /Q&A by OCD, GOHSEP, FEMA, federal partners, SBA re: resources and technical assistance available

II. PUBLIC COMMENT RESPONSES

IDA APA 1 PDF SUBMITTED COMMENTS JUNE 29-30

GENERAL

COMMENT: On behalf of the East Baton Rouge Parish Housing Authority (EBRPHA), we would like to express our appreciation in the timely completion of the Substantial Amendment No. 1 of the Proposed Master Action Plan in Response to Hurricanes Laura, Delta and Ida. Upon review of the Master Action Plan and Substantial Amendment No. 1, we would like to present the following comment(s) for consideration prior to final submission of the Action Plan Amendment to HUD:



- As a mission focused organization, whose purpose is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency and neighborhood revitalization, we are in full support of expand quality affordable housing opportunities throughout the state. It is critical and appreciated that the State (OCD) has dedicated CDBG-DR funds from the 2021 disasters to the needs of those areas most impacted and distressed by the storm. The programs goals appear to align with the work of housing authorities across the state, and particularly the type of transformative projects EBRPHA plans to pursue to bring about significant improvement to the communities we serve. When developing policies, we encourage maximum flexibility be given when setting parameters regarding requirements related to size or limitations on funding sources related to housing developments.
- We also ask OCD to consider funds that would support critical infrastructure and services that also may be needed to make affordable housing units more sustainable and economically feasible for the low-to-moderate income populations being served. For example, funds for transportation infrastructure, economic revitalization, job training, and resiliency.
- In understanding the need of programs that support affordable housing development that prioritize low to moderate income communities, we request consideration of local housing authorities to be deemed eligible applicants. We thank you in advance for your consideration.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Resilient Communities Infrastructure Program and Hometown Revitalization Program may include more opportunities for infrastructure, economic revitalization and resilience. Public housing authorities may participate as a general partner in the Resilient Mixed Income Gap Funding Program (PRIME) detailed in the action plan.

COMMENT: Public Comment Response to Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) to the Action Plan for Recovery from Hurricanes Laura and Delta The following comments are submitted on behalf of [SBP](#), a social impact organization focused on disaster resilience and recovery. SBP takes a detailed and methodical approach to shrink the time between disaster and recovery - reducing risk, increasing resilience and improving the recovery process - to effect transformational change in the disaster recovery system and restore opportunity and security for people and communities. Specifically, SBP's Advise team has trained over 2,000 government leaders implementing recovery programs across the nation, through webinars and in-person training since 2019. We are headquartered in New Orleans, LA and serve disaster-impacted communities around the country. SBP has provided an analysis of this Substantial amendment, and we are happy to discuss further details, if useful, to LA-

OCD or their partners. In the pages below we note in bold the section in question as well as the page(s) on which that section is located within Substantial Amendment 1 to the State of Louisiana Master Action Plan for 2020 and 2021 Federal Declarations in Louisiana. Each section contains SBP’s recommendations for items we suggest LA-OCD implement or consider.

Executive Summary – Overview (Pg. 9) The State asserts “HUD has allocated \$1,272,346,000 in CDBG-DR funds to the State of Louisiana in response to Hurricane Ida (DR 4611) as well as \$10,776,000 to the City of Lake Charles and \$4,648,000 to the City of Baton Rouge in response to Louisiana Severe Storms, Tornadoes, and Flooding (FEMA 4606) through the publication of the Federal Register, FR-6326-N-01 (Awards and Allocations - HUD Exchange).” HUD allocated funding in the amount of \$1.272B to the State of Louisiana for both Hurricane Ida and the May 2021 Floods. The language in this section implies that the State of Louisiana is only administering funding for Hurricane Ida, while all the funding for the May 2021 Floods will be administered by the Cities of Baton Rouge and Lake Charles. The remainder of the substantial amendment, especially the unmet needs analysis, frequently only references Hurricane Ida instead of both disasters, further confusing the public. The State’s [presentation during the Virtual Public Hearing](#) also falsely claims that the HUD allocation to the State was \$10 million for the May 2021 Floods and \$1.27 billion for Hurricane Ida. It is unclear through the presentation, [the recorded meeting](#), and the Substantial Amendment language if the State was referencing the \$10 million allocation for Lake Charles in the budget breakdown on page 5 of the presentation or if the State was intending to only spend \$10 million of the \$1.27 billion allocated for 2021 disasters on activities benefitting May 2021 Flood survivors. Two parishes – Calcasieu and Lafayette – were declared for FEMA IA for Louisiana Severe Storms, Tornadoes, and Flooding (May 2021 Floods) but not for Hurricane Ida. Calcasieu is on the list of HUD Identified MID Areas, further discrediting the misconception perpetuated throughout this amendment that the \$1.27B allocated to the State was only for Hurricane Ida. The State also neglected to include Lafayette Parish anywhere in the Virtual Public Hearing Presentation. SBP encourages LA-OCD to consider the following:

Clarify the language in the executive summary to reflect the correct allocations and locations of funding for 2021 disasters. In clarifying the executive summary, use the correct language represented in your federal register notice in order to accurately represent the \$1,272,346,000 being used by the state for recovery from both Hurricane Ida and the May 2021 floods.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state’s action plan announces the allocation amount to the state along with the amounts allocated to City of Lake Charles and City of Baton Rouge. The budgets and programs in the amended action plan do not reflect any

portion of either city's direct allocation. Each grantee that receives a direct allocation is responsible to submit its own action plan.

Summary (Pgs. 13 – 15) The State asserts “Citizen engagement efforts include but are not limited to public hearings, social media outreach, earned media engagement, traditional marketing around the availability of the draft action plan for public review, and additional targeted outreach in the 22 HUD-declared MID areas from Hurricanes Ida.” The Federal Register Notice 87 FR 31636 has the following listed as the Most Impacted and Distressed areas for both Hurricane Ida and the May 2021 Floods: Ascension, Assumption, Calcasieu, East Baton Rouge, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Mary, St. Tammany, Tangipahoa, Terrebonne, and Washington Parishes; 70764 & 70788 (Iberville Parish) and 70767 (West Baton Rouge Parish). The [presentation during the Virtual Public Hearing](#) only outlines Ascension, Assumption, Calcasieu, East Baton Rouge, Jefferson, Lafourche, Plaquemines, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Mary, St. Tammany, Tangipahoa, Terrebonne, and Washington Parishes, as well as Iberville (70764 & 70788) West Baton Rouge (70767) as MID areas for Hurricane Ida and the May 2021 Floods, leaving out Livingston and Orleans Parishes.

SBP encourages LA-OCD to consider the following:

- Clarify with public outreach whether the proposed programs will also serve disaster survivors in Livingston and Orleans Parishes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Both Orleans and Livingston Parishes are eligible to participate in the proposed programs. All impacted parishes were invited to participate in the regional and virtual public hearings conducted during the public comment period, a list of those meetings can be found here: <https://restore.la.gov/public-hearings>. The state exceeded HUD’s minimum requirement of two public hearings for grantees with allocations greater than \$500M. The state will conduct targeted program outreach upon launch of the proposed programs outlined in the plan.

Unmet Need and Proposed Allocations (Pg. 16)

87 FR 31636 requires the State to demonstrate a reasonably proportionate allocation of resources relative to areas and categories (i.e. housing, economic revitalization, and infrastructure) of greatest needs identified in the grantee’s impact and unmet needs assessment or provide an acceptable justification for a disproportionate allocation. The State’s summary of unmet need shows the largest unmet need is in economic revitalization,

followed by housing and infrastructure, yet the State’s proposed allocation provides for the most funding towards housing, followed by infrastructure and economic revitalization.

SBP encourages LA-OCD to consider the following:

- The state should continue to prioritize housing activities to low- to moderate-income households.
- Due to the updated requirement in 87 FR 31636, the state should better articulate the justification for such a disproportionate allocation of resources compared to unmet need.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Majority of the state’s proposed programs will prioritize benefit to LMI residents. The need for safe, decent, and affordable housing is the state’s top priority, therefore, the largest portion of funding has been allocated to assist impacted homeowners and renters through programs that address disaster impacts and affordable housing.

Unmet Needs Assessment Overview (Pgs. 17 – 25)

The unmet needs assessment frequently references only Hurricane Ida instead of both Hurricane Ida and the May 2021 Floods. For instance, “Each of the specified areas had more than 1,000 housing units damaged in Hurricane Ida and collectively 96 percent of all damaged units are within these parishes.” The area references the specified MID Areas for both disasters, but then only references Ida damage. Calcasieu Parish is included the 22 HUD Identified MID areas, but did not have more than 1,000 housing units damaged by Ida. Additionally, the Demographic Data related to Age and Family Size, Income Levels, Education, Disability, Race, and Limited English Proficiency is only provided for the 25 IA declared counties for Hurricane Ida, excluding Calcasieu and Lafayette Parishes, which were declared for IA in the May 2021 Floods but not for Hurricane Ida. It is not until the Impacts of Insurance table that the State includes both the May 2021 Floods data with the Hurricane Ida data.

SBP encourages LA-OCD to consider the following:

- The state should include demographic data for all IA declared parishes for both disasters.
- In doing so, the state will have a better understanding of how to conduct targeted outreach to vulnerable populations within the affected parishes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community

Development will include your comment and our response when we submit the plan to HUD for federal approval by the state. The state will leverage available resources and work with partner agencies and organizations, as well as local municipalities, to conduct strategic and targeted outreach in all MID areas upon executing the grant agreement with HUD and individual program launch.

Housing Unmet Need (Pgs. 25 – 56)

The Housing Unmet Need frequently excludes the two parishes affected by the May 2021 Floods but not Hurricane Ida. Additionally, it is unclear throughout the Housing Unmet Need section when the State is referencing both disasters and when the State is only referencing Hurricane Ida. While Hurricane Ida was by far more damaging, categorically excluding a HUD MID area in the unmet needs assessment under counts the need in Calcasieu (outside of Lake Charles), which the State will be responsible for, and is contradictory to the State's assertion that it is interested in an equitable recovery. It is unclear from the data tables whether Lafayette Parish did not have any FEMA IA Applicants or whether the data was excluded, but the total of homeowner applicants and tenant applicants by parish together are just over 3,800 less than the total for applicants by housing type in the next table.

SBP encourages LA-OCD to consider the following:

It is unclear from the description and the data tables for Vulnerable Populations by parish as to what the weighting is for each category. For instance, Pointe Coupee Parish, labeled as

Moderate to High SVI Vulnerability has an average % across all categories of 23%, while St. Martin Parish, labeled as High SVI Vulnerability only has an average % across all categories of 20%. This discrepancy would indicate that some categories are weighted higher than others.

SBP encourages LA-OCD to consider the following:

- Publish the methodology for determining SVI Vulnerability in clearer terms either within this section, or later in the currently empty Appendix D – Data Sources/Methodologies.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The data came from the CDC's Social Vulnerable Index (SVI) website which can be found at <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>.



Calcasieu Parish is excluded from the Mobile Housing Units Impacted by Disaster table. It is unlikely that Calcasieu Parish, which had over 5,000 units impacted by the disaster as a result of 2020 storms, had no mobile units impacted by the May 2021 Floods. This exclusion also indicates that the tables do not include the May 2021 Floods data for the parishes impacted by both the floods and Hurricane Ida.

SBP encourages LA-OCD to consider the following:

- Clarify whether or not May 2021 Floods data was collected and reported in the Mobile Housing Units Impacted by Disaster table.
- If Calcasieu Parish was included but had no units impacted, include the parish with a null for clarity.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Mobile Housing Units Impacted by Disaster table has been updated.

Economic Revitalization Unmet Need (Pgs. 63 – 67)

The unmet needs analysis for economic revitalization excludes all data for the May 2021 Floods. Even without including May 2021 Flood data, the unmet need in the Economic Revitalization category is still vastly higher than the Housing and Infrastructure unmet need, yet the state is allocating the least amount of funding to Economic Revitalization programs.

SBP encourages LA-OCD to consider the following:

- The state should use the trends from the formal LED-commissioned study to estimate the need for the May 2021 Floods.
- Provide reasonable justification for the disproportionate allocation of funding compared to the unmet need.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state has updated the Unmet Needs section to include the data captured in the “Economic Impact of the May 17-21 Floods on the State of Louisiana” prepared by Louisiana Economic Development. The largest portion of funding has been allocated to assist impacted homeowners and

renters through programs that address disaster impacts and the need for affordable housing, as these were the largest needs identified in the unmet needs assessment conducted by the state. The need for safe, decent, and affordable housing is the state’s top priority, which is why the state has prioritized funding for housing and has allocated a proportion not equivalent to the unmet needs described in the amended action plan.

Amendments (Pgs. 76 – 77)

The state has historically utilized a substantial amendment threshold of some dollar amount (\$1-5M) or 15 percent of a program budget change, with the exception of the CDBG-MIT program which sets the threshold at 25 percent. Substantial Amendments take significantly

more time to develop and to be submitted to HUD for approval, which can slow down a program when mid-program adjustments are required.

SBP encourages LA-OCD to consider the following:

- Instead of the current threshold of “The allocation or reallocation of the greater of either a re-allocation of more than \$5 million dollars or a reallocation which constitutes a change of 15 percent or greater of a program budget” should be changed to have monetary threshold changed to only include reallocations between program categories (Housing, Infrastructure, Economic Revitalization) instead of reallocations between program budgets. This change will allow the State to quickly adapt as needed, allowing for a swift recovery.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. HUD has provided guidance to the state that this FRN requires a substantial amendment for the additional allocations. The state is actively working to receive expedited approval of the action plan amendment and enter a grant agreement with HUD to launch programs to assist areas impacted by Hurricane Ida or the May 2021 Severe Storms.

Interim Housing Assistance Program (Pgs 115-117)

The Interim Housing Assistance Program will provide low-income clients with interim mortgage or rental assistance while displaced during the Restore Louisiana Homeowner Assistance Program.

SBP encourages LA-OCD to expand the program in the following ways:



- For those low-income homeowners who would otherwise be eligible for this assistance but were able to complete the repairs on their house and exist in the Solution 3 Reimbursement pathway, make their displaced housing costs reimbursable. This can be done through submission of appropriate documentation such as mortgage statements and notarized receipts from landlords. This would alleviate some of the burden many homeowners throughout the state of Louisiana are currently experiencing.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The goal of interim housing assistance is to provide approved, active applicants in the Restore Program who have no other temporary housing option to move out of their damaged home in order to help expedite the repair or reconstruction of their home. Other available programs that may reimburse for housing expenses outside of the Restore Program are listed on our website at <https://restore.la.gov/>.

- SBP also encourages providing more clarity on the maximum benefit allowed under this program. The program allows for “a) the lesser of the mortgage house payment or additional interim housing cost incurred for up to 20 months or b) the maximum 2022 fair market rents based on the household size, for up to 20 months (pending waiver to extend).” What are the factors involved with determining whether “a” or “b” will be used when calculating the client’s benefit?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The intent of interim housing assistance is to provide approved, active applicants in the Restore Louisiana Homeowner Assistance Program who have no other temporary housing option to move out of their damaged home in order to help expedite the repair or reconstruction of their home. OCD realizes there are others outside of the Restore Louisiana program that have interim housing needs and potential resources are listed on our website at <https://restore.la.gov/>. This policy is under development, The length of time is determined by the SOW. We go off of PPM49 rates for repairs and fair market rents published by HUD for rentals. It is not paid in arrears. It is only to move a family out of/off of a property while repair or recon work is being completed.

Flood Insurance Program (pgs 112-114)

The Flood Insurance Program covers the cost of the first year of flood insurance coverage for eligible clients, along with providing critical resources such as educational counseling on household budgeting and the need for flood insurance.

SBP encourages LA-OCD to expand this program in the following ways:

- According to the housing unmet needs data, 74% of homeowners with wind damage (23,448 out of 31,663) were without homeowners insurance. Due to the considerable volume of underinsured homeowners, SBP would encourage an expansion of this program to include one year of homeowner's insurance coverage for those eligible clients in high risk wind zones, or provide similar educational counseling resources for these high risk wind zone homeowners on household budgeting and proper insurance coverage for wind-related damage.
- LA-OCD will notify all clients who are required to purchase and maintain flood insurance of the statutory obligation to notify any transferee of the requirement in written documentation evidencing the transfer of the property. SBP would encourage LA-OCD to also provide each client with a template of this written documentation for the client to properly file as a covenant running with the land, ensuring the client has a straightforward path to meeting their obligation.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD has provided the requirement within the closing documents (grant agreements with the homeowner). The state overall objective is for homeowners have their own coverage in the event of future disasters therefore reducing the need for federal funds to support homeownership. The homeowner upon purchase agreement should include the information in the disclosure forms.

- In the interim between the current time period and the Restore Louisiana Homeowner Program grant closeout, low-income clients who may be eligible for the Flood Insurance Program are currently vulnerable to another storm event. SBP would encourage

LA-OCD to make reimbursement of current flood insurance policies purchased since Hurricane Ida an eligible activity within the Flood Insurance Program, and increase the maximum award from \$2,000 to \$2,500.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The intent of Flood Insurance Assistance is to provide approved, active applicants in a SFHA who have no other means of paying for the required flood insurance remain compliant with their grant requirements. The program also teaches how to budget for the flood insurance going forward to ensure grant recipients remain grant compliant. OCD strongly encourages all homeowners to maintain homeowners insurance, and will work with the Louisiana

Department of Insurance to provide more information about flood and homeowners insurance at future outreach events.

Restore Louisiana Homeowner Program (Pgs. 132-136)

The Restore Louisiana Homeowner Program will provide eligible homeowners with assistance in repair, replacing, or elevating their storm damaged homes through three distinct pathways: Program-Managed Construction (Solution 1), Homeowner-Managed Construction (Solution 2), and Reimbursement (Solution 3).

SBP encourages LA-OCD to expand this program in the following ways:

- Restore will conduct targeted outreach events to ensure vulnerable populations will have access to available information and resources regarding the program. SBP encourages the program to place an emphasis on partnering with Long Term Recovery Groups and Nonprofit entities operating at the local level who are familiar with each community's specific needs.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD continues to review data to identify potentially eligible homeowners who applied for FEMA assistance and have not completed the Restore survey. OCD Plans to conduct extensive targeted outreach upon launch of individual programs, which will include but is not limited to coordination with local officials, Long Term Recovery Organizations, faith-based and non-profit organizations, , community members in impacted areas, as well as heat mapped data points to identify gaps in geographic and vulnerable areas. Event will be posted on the website <https://restore.la.gov/> as dates and details are finalized.

- Restore's Solution 2 pathway allows for the client to opt-in to receive an additional allowance of \$3.75/sqft for roof construction to the IBHS Fortified Roof standard. SBP would encourage this allowance to be expanded to include clients within the Solution 3 pathway. This would encourage those homeowners currently rebuilding to build to a higher standard, which will decrease the considerable volume of wind damage experienced during the next storm event.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. This is available to Solution 3 applicants if they can provide the required IBHS Fortified passed certification inspections and final certification documents.

Appendix B - Waivers (Pgs. 154-158)



The State has identified a request to HUD to waive the 70% Overall Benefit Requirement in Appendix B – Waivers #4, but the language under the header does not include what is being requested. Instead, the language from “3. EXTENSION OF TENANT BASED RENTAL ASSISTANCE” is repeated in both the Original Submitted Action Plan and the Substantial Amendment.

SBP encourages LA-OCD to consider the following:

- Clarify this section to inform the public of the reasoning for requiring a waiver.

Include any analysis the state completed showing a need for lowering the overall benefit percentage.

The waiver submitted provided the rationale for requesting a 60% overall benefit requirement based on the FEMA IA data HUD used to determine Louisiana’s unmet need and allocation.

General Questions:

Why are the loan programs offered just as loans, instead of incentivizing resilient projects through offering grants in addition to loans for more competitive applications?

Example: Page 119 - Middle-Market Loan Program (MMLP)

"The MMLP program will award funding to eligible applicants in the form of gap financing loans to support the construction or rehabilitation of affordable housing units."

Page 121 - Neighborhood Landlord Rental Program

"The Neighborhood Landlord Rental Program assists landlords with loans for rehabilitation or reconstruction of damaged rental properties as a direct result of Hurricane Ida."

Page 130 - Resilient and Mixed Income Gap Funding Program (PRIME) for 2021 Disasters "PRIME provides gap financing loan assistance as a “piggyback” to Low Income Housing Tax Credit developments."

Page 148 - Resilient Communities Infrastructure Program

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

A few programs only reference Hurricane Ida, not both 2021 disasters - Hurricane Ida (DR 4611) and Louisiana Severe Storms, Tornadoes, and Flooding (DR 4606) (May 2021 Floods). Is it the State's intent to not provide assistance in these programs to those impacted by the May 2021 floods?

Example: While Hurricane Ida had more damage, the area affected by the May 2021 floods but not Ida is also still trying to recover from Hurricanes Delta and Laura in 2020. With cascading disasters, it is often difficult to precisely account for which disaster inflicted what damage. Both the original action plan and this substantial amendment (and the 2019 DOB Notice) allow for subsequent damage from a cascading disaster to be an eligible cost. Calcasieu Parish was a designated Parish for Individual Assistance for the May 2021 floods, as well as Hurricanes Delta and Laura, but not for Hurricane Ida. Lake Charles received their own HUD CDBG-DR allocation for DR 4606, but the remainder of Calcasieu Parish will need support from the State administered allocations.

Page 121 - Neighborhood Landlord Rental Program

"The Neighborhood Landlord Rental Program assists landlords with loans for rehabilitation or reconstruction of damaged rental properties as a direct result of Hurricane Ida."

NLRP for Laura and Delta was included in the first AP.

Page 133 - Restore Louisiana Homeowner Program (RLHP)

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

Page 134 - Restore Louisiana Homeowner Program (RLHP)

Geographic eligibility and eligible applicants are in conflict with one another

Geographic Eligibility: FEMA IA declared parishes for Hurricane Ida (DR 4611) and May 2021 Floods (DR-4606)

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

- Owner occupant at time of disaster event
- Damaged property address was the applicant's primary residence at the time of disaster event
- Located in one of FEMA IA declared parishes for Hurricane Ida



The State's proposed Soft Second Mortgage Program includes language to allow for loan forgiveness. What is the State's plan to monitor occupancy, especially in years 7-10 when the CDBG-DR grant period of performance will have ended? Monitoring for this program is on-going until second mortgage is forgiven.

Example: Page 137 - Soft Second Mortgage Program

"One tenth of the soft second mortgage will be forgiven every year the household maintains their primary residence."

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. It is the intent of OCD that all administered programs include all disasters identified by HUD in its allocations and federal notices. No program is designed to exclude an area because of the specific disaster. Updates to clarify will be made in the amendment.

COMMENT: We thank you and the Louisiana Office of Community Development for the expansive recovery options for parishes with significant unmet needs and damages from natural disasters. Terrebonne Parish is working on programs to increase the resilience of the government functions through Public Assistance, which will be made more accessible due to the state allocation of CDBG funding to globally match those efforts. Similarly, the homeowners in the elevation and reconstruction programs prioritized by the administration will face no or a reduced local share requirement. These are enabling steps that will advance those initiatives without a longterm financial burden on the government or residents. It is our understanding that the global match projects will be identified and implemented by the Parishes which will be allocated block grants for that purpose. The administration will provide a list of those projects as the details become clearer. We appreciate the opportunity to develop infrastructure projects beyond those eligible for FEMA funding. Questions, comments and concerns are listed below for your consideration. Some elements of the plan are not well understood, and we propose these topics for further study or revision in the Action Plan Amendment to better serve the recovery of all stakeholders. The recovery of all depends on the recovery of each. Page 9. The text states that "HUD has allocated \$1,272,346,000 in CDBG-DR funds to the State of Louisiana in response to Hurricane Ida (HR4611) as well as \$10,776,000 to the City of Lake Charles and \$4,648,000 to the City of Baton Rouge in response to Louisiana Severe Storms, Tornadoes, and Flooding (FE:tvra 4606) ... " The language suggests that there is \$1.2B for Hurricane Ida alone and other funds for what is called the May 2021 Floods. The top of page 9 and the bottom of page 15 and the budget on page 16. Each seem to state that the total for all storms is \$1,272,346,000. Which is correct? If it is all one, then the text above should state "including" rather than "as well as."

Infrastructure

The definition of “infrastructure” should include mental health facilities explicitly. Noted that health facilities are not funded in the line item budget. Would that preclude funding being expended on a mental health facility where a need exists? We understand that the global match for the HMGP and PA programs will be achieved through Parish selected infrastructure projects. Do those projects need to be submitted to FEMA and approved as HMGP projects to be used as global match? If so, is there any agreement that HUD will accept the environmental review process from FEMA? We assume that there will be a citizen participation process and OCD /HUD approval for all projects as well, but did not know how it would be coordinated with the FEMA programs. Will there be allocations for flexible spending for project not eligible for FEMA funds?

Design flood elevation - .02%

Does the state have a map of the 500-year floodplain throughout the state to implement that standard? The Parish requested that numbered map explicitly in the LAMP process, but it was not provided by FEMA. Each structure would need to get a FEMA certified DFE with our current information unless the state is paying for someone to develop it. We would encourage the state to work with the FEMA Region to get that map created as an official tool for floodplain management. How does the 500-year floodplain interact with or meet the requirements of the Federal Flood Risk Management Standard implementation by HUD? If that is in the Federal Register notice, please reference that in any response.

Match

Thank you for the support of the HMGP elevation and reconstruction programs. We regret that the match provided is limited to the 10% for the reconstruction projects as many projects the match will be greater than 10% due to the FEMA restrictions on spending. This is particularly true if FEMA allows the Parish to build Fortified structures. Wee OCD is promoting with CDBG funds. Not everyone will be eligible for the RestoreLA program and funding in that program is unlikely to be sufficient to serve everyone, particularly with the generous and appreciated \$300,000 cap. The HMGP program is capped at \$150K, and it is our experience that the average house (2,100 sf) in Terrebonne Parish would cost \$264K to build at that level without Fortified standards. The Parish is providing stickbuilt housing only, and is interested in building to the Fortified standard in order to provide another level of safety beyond the minimum building codes. We are very excited that OCD has taken the step to build fortified roofs and homes and will do whatever we can to promote training to roofers and builders in preparation for that demand. We have, in fact, already taken steps to identify the statewide licensed roofers and have sent recruitment materials to them describing the program and offering training online and live through the Fortified staff.



National Objective

If a project is approved as urgent need or area benefit at the time the project or program is approved, will national benefit be applicable for the life of the project as long as the criteria was met or could it be revisited on a per household basis if a certain amount of time passes prior to implementation? If so, is there any indication what the timeline would be?

Flood Insurance

Does the Flood Insurance Program assume that the homes are in low risk areas or assume freeboard to take advantage of freeboard discounts? We are concerned that the \$2,000 grant for flood insurance could become a de facto limit on participation for those with premiums above that level. We would be interested to know what the \$2,000 limit is based on? Is that connected to the average Risk Rating 2.0 premium for the average LMI house in the Louisiana most damaged areas? We would suggest, though it may not be negotiable with HUD, that there be a minimum threshold of funding spent on a repair before the flood insurance requirement kicks in. Regarding future conditions, we hope that OCD will share with the parishes addresses that have received funding and are required, therefore, to have flood insurance. This will assist the parish in identifying if funding was provided to a structure prior to the provision of funding after a storm.

Interim Housing

Does this program assume that there are a significant number of people still living in homes that will be demolished, and the program is offering Interim Housing during the repair or reconstruction program? What will distinguish who gets 20 months of support and who gets 90 days

Housing Choice

The Parish supports the provision of manufactured housing as a quicker path to stability for some residents if the standards are sufficient to meet wind speeds anticipated in the Parish. Will people in the RestoreLA program be able to request or be eligible for stickbuilt homes if they currently have a trailer if the lot will accommodate? The benefits of the higher standards outweigh the increase in the initial expense both for the cost of insurance and future damage reduction in general, but residents want us to ask for confirmation that they may be eligible for a stickbuilt or modular home. Some people who stayed in trailers/manufactured homes during the storm are traumatized by the event and may not feel safe in another.

Respectfully,

Jennifer C. Gerbasi, Recovery Planner



Terrebonne Parish Consolidated Government
Department of Planning and Zoning, RAMP Division
Cc: Council Reading File

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

General

Approved applicants for the Restore Louisiana Homeowner Assistance Program have choices for reconstruction of a damaged stick-built dwelling to a manufactured/modular home or replacement of a manufactured/modular home with a stick built dwelling up to the damaged MHU cap, less any Duplication of Benefits. Please see in the program policy manual page 67 Section B- Solution 2: Homeowner Managed Construction, ix: Solution 2 Manufactured Housing Unit Replacement, b. MHU to Stick-built Replacement. The duration of the Restore Louisiana Interim Housing Assistance is based on the scope of work to be completed.

Infrastructure

The Resilient Communities Infrastructure Program will allow for projects that are not funded through FEMA and are a local unmet need. The program policy will be available on the Restore Louisiana website once the program is launched. We appreciate your input and will follow up with you as we develop the program policies.

Design Flood Elevation

No, OCD does not maintain a statewide map for the 500-yr or 0.2 % chance floodplain. The data is the responsibility of FEMA and in coordination with Parish floodplain administrators. Some parishes have Digital effective data while others have some preliminary data and some still use effective paper maps. There are online resources like the FEMA Flood Map Service Center, or Louisiana Flood Maps Portal- LSU AgCenter that can be used for many parishes. Additionally, LA DOTD is the State Coordinating Agency for the National Flood Insurance Program. They may have additional resources.

The Federal Flood Risk Management Standard gives flexibility on how federal agencies consider and manage current and future flood risks in order to build a more resilient nation. The 500-year floodplain as well as a freeboard value approach are two of those listed approaches.

Match



The global match structure only applies to FEMA’s HMGP program. The non-federal match to FEMA’s PA program will be on a project basis. Eligible projects under both HMGP and PA programs, must be submitted and approved by FEMA. FEMA environmental is acceptable for the match programs. The program policies will provide specific requirements and eligibility details for each infrastructure program and will be available on the Restore Louisiana website once the programs are launched.

National Objective

Both national objective and benefit area are determined at application approval. If there are changes to the project area or national objective, then it could be reviewed and modified as needed during the life of the project.

Flood Insurance

This cap is based on the averaged amount of flood insurance premiums paid to active applicants in the Restore Great Floods of 2016 Program. OCD will be happy to discuss creating an agreement with parishes to share addresses of those that received the Restore Louisiana grant and are therefore required to maintain flood insurance on the restored property in perpetuity.

Interim Housing

The intent of interim housing assistance is to provide approved, active applicants in the Restore Louisiana Homeowner Assistance Program who have no other temporary housing option to move out of their damaged home in order to help expedite the repair or reconstruction of their home. The duration of the support is linked to the repair or reconstruction projects scope of work. OCD realizes there are others outside of the Restore Louisiana program that have interim housing needs and potential resources are listed on our website at <https://restore.la.gov/>.

COMMENT: 6.29.22

OFFICE OF THE PARISH PRESIDENT

Along with my fellow Hurricane Ida-impacted Parish Presidents, we want to thank you and your team for expediting the completion of the *Substantial Amendment No. 1* related to the much-needed Hurricane Ida funds under the *Proposed Master Action Plan for the Utilization of Community Development Block Grant Funds - Disaster Recovery (CDBG-DR) Funds*. The amendment provides a needs-based response to guide Louisiana's use of the \$1.27 billion in supplemental disaster appropriations made available through the September 2021 passage of PL-117-43. The Office of Community Development's ability to construct and release action plans quickly and

responsive to the unmet needs analysis is truly impressive and much appreciated in furthering recovery as soon as possible.

These resources are the most significant tool to assist our communities with long-term recovery and present an unprecedented opportunity to help position our parishes for a more resilient future, while satisfying core eligibility requirements related to low-to-moderate income populations and unmet needs. Particularly considering the types of impact from Hurricane Ida, resulting from a strong winds and high rainfall event, it highlighted the weaknesses in critical infrastructure and overdue investments greatly needed to bring about long-term resiliency. In consideration of the programs and allocations laid out in the Action Plan Amendment, we support the overall content and direction of the programs and would like to submit the following comments and input for consideration as you finalize the Action Plan Amendment for submittal to HUD for approval:

- Flexibility in the program design to allow the opportunity to fund significant, catalytic projects that position our communities for the myriad of challenges posed by rapidly changing environmental, economic, and social situations. For instance, in Jefferson Parish, we are eager to showcase pilot large scale green infrastructure programs that service infrastructure, environmental and quality of life needs.
- As noted in the Amendment, it is challenging to be faced with reallocating already limited resources to address immediate recovery needs, as well as trying to meet the additional costs of safeguarding critical infrastructure assets from future disasters. In that regard, we would request consideration to allow for an increase in the amount of discretionary funds directly to local governments for the critical needs, for example the ability to use more funds under the Resilient Communities Infrastructure Program rather than tied to the PA FEMA Public Assistance and the Hazard Mitigation Grant Program.
- Shift funding to allow for higher allocations, such as \$100+ million in the Resilient Communities Infrastructure Program (proposed \$50 million) and Hometown Revitalization Program (proposed \$75 million), that may open the opportunity to invest in transformative projects and programs that are truly impactful.
- While we agree and acknowledge the need for recovery programs to support affordable housing development, in light of the substantial allocation to the Resilient Mixed Income Gap Funding Program (proposed \$407 million) which is intended for funding of affordable rental housing, we request consideration to allow a program to support development of new, affordable homeownership opportunities as well.

In summary, we are requesting that you provide consideration to expanded funding and flexibility to local priorities or infrastructure that would enable catalytic projects which responds to unmet needs from Hurricane Ida and while prioritizing benefit for low to moderate income populations. Additionally, we are asking for gap

financing programs related to affordable housing to be expanded to accommodate homeownership opportunities as well.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Resilient Communities Infrastructure Program is proposed to assist in addressing those projects that are needed but not eligible under FEMA PA or HMGP Global Match. As our office is developing the program policy manual, we will be contacting you and other entities regarding this type of request for use of the eligible match funding. Please note, through the Restore Louisiana match programs, it is at the discretion of the grant recipient how the funds are used. Additionally, should any more funding come available, the program will take into consideration program expansion to include more community investment opportunities.

COMMENT: Southeast Louisiana Legal Services (SLLS) submits this comment regarding the Proposed Substantial Action Plan Amendment in Response to 2020 and 2021 Federal Declarations in Louisiana (hereinafter “plan”), and suggests that the Louisiana Office of Community Development could more effectively fulfill its intent to bring much needed disaster aid to disaster victims with unmet needs if it would revise the plan to consider the following issues: (1) The current plan prioritizes homeowners and does not offer sufficient support to renters. (a) The plan should prioritize development of deeply affordable rental housing for the lowest income families. (b) OCD should impose longer affordability covenants and other renter protections as part of its recovery programs. (c) OCD should prioritize direct assistance to renters. (2) It is unfair for Restore Louisiana to only cover people who received a major/severe damage determination from FEMA because it blocks those with significant unmet needs from the Restore program. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 (a) By limiting assistance to those FEMA determined to have major/severe damage, OCD is not following HUD’s directive to “identify needs that were not recognized by other programs and funding sources.” (b) Requiring a FEMA determination as an eligibility requirement unfairly disadvantages people with insurance, who often do not complete a FEMA application knowing they are ineligible for assistance. (c) Requiring a FEMA determination of major/severe damage as an eligibility requirement will harm vulnerable populations already overlooked by FEMA. (3) The “Flood Insurance Program” eligibility threshold should be increased to 120 percent AMI to increase equity and maintain consistency throughout the plan. (4) OCD should account for the consistent problem of contractor fraud among low-income disaster victims by specifically tailoring program eligibility to include victims of contractor fraud. (5) The plan can improve accessibility and ensure that vulnerable populations will be equally served by expounding on targeted outreach strategies. (6) Rather than give vague assurances buried in documents accessible to English speakers, make applications, notices, and the program manual, all of which are vital documents, available in Spanish and Vietnamese. SLLS provides free civil legal aid to low-income people residing



in 22 parishes across southeast Louisiana. Our service area includes about half of the poverty population in Louisiana, one of the poorest states in the nation. Our service area is also among the hardest hit by hurricanes and tropical events. Persons experiencing poverty are often the most disadvantaged when it comes to recovering from natural disasters for various systemic reasons, creating a large need for federal and state aid for these hard-hit communities. OCD's plan will undoubtedly help many Louisianans experiencing poverty who are still struggling to recover from Hurricanes Ida, Laura, and Delta. We applaud the OCD for recognizing that "storm and flood-related risk often corresponds with a high level of social vulnerability, compounding the impact of flood events with the challenges of poverty for many victims," and striving to design programs that fit the needs of Louisiana's most vulnerable populations.¹ SLLS has had recent experience helping clients experiencing poverty to navigate Restore Louisiana programs after the Great Flood of 2016 and Road Home after Hurricane Katrina in 2005. Further, all of the parishes we serve are part of the federally-declared major disaster declaration for Hurricane Ida. Our clients all fall into one or more categories of OCD's definition 1 State of Louisiana's Substantial Action Plan Amendment No. 1 for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana, page 40. <https://www.doa.la.gov/dao/ocd/policy-and-reports/apa/> Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 of "vulnerable populations," defined by the plan as including "persons under the age of 20, persons over the age of 64, persons with disabilities, persons living in poverty, and persons living in manufactured homes..."² This experience allows us a unique vantage point to identify shortcomings in the current plan, and help OCD reach its stated goal of "prioritizing those most in need of assistance with its housing programs."³ (1) **The current plan prioritizes homeowners and does not offer sufficient support to renters.** We are pleased to see that the state has allocated a substantial portion of funds in the plan to housing needs, and within that, a large percentage for rental housing. According to 2020 American Community Survey data, roughly one-third of Louisianans rent their homes. In the three most populous parishes impacted by the 2020 and 2021 storms, Orleans, East Baton Rouge, and Jefferson, the percentage of renters is 50%, 40%, and 37% respectively.⁴ According to a 2019 LSU study of Census data, 42.9% of renter households in Louisiana are cost burdened, spending more than 30% of their income on rent. Of those, nearly half are extremely cost burdened, paying half of their income on rent or more. The percentage is higher in the New Orleans, Hammond, and Baton Rouge metropolitan areas. Clearly, the need for affordable rental housing is great and was exacerbated by the 2020 and 2021 storms. The plan appropriately allocates substantial resources to affordable rental housing. However, we have concerns about which renters the funds target and which renters will inevitably be left out. **a. The plan should prioritize development of deeply affordable rental housing for the lowest income families.** We are happy to see the State investing in development and rehabilitation of affordable rental housing units for the LMI population; however, we do not believe that the enumerated investments are sufficient to meet the need. First, we are concerned that these units will not ultimately serve the most economically vulnerable families in impacted parishes, namely those who survive at 30% AMI and below, rather than 80%. Roughly one-third of renter-occupied households in Louisiana qualify as extremely low income, meaning their income is at or



below 30% AMI.⁵ It is much harder for extremely low-income renters to find affordable housing than low- and moderate- income renters. 67% of extremely low-income renters are cost burdened statewide, compared to 43% of low-income renters (50-80% AMI), and only 12% of moderate-income renters (80-120% AMI).⁶ *Id.* at 41. ³ *Id.* 4 Table S2502 (2020 ACS 5-year estimates subject tables), United States Census Bureau, available at <https://data.census.gov/> (last visited June 30, 2022). ⁵ *Supra*, note 1 (number of renter occupied units in Louisiana); Gap Report – Louisiana, National Low Income Housing Coalition (2022); *available at* <https://nlihc.org/gap/state/la> (percentage of renters who are extremely cost burdened); 24 C.F.R. §93.2 (definition of “extremely low income”). ⁶ *Id.* Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 Data consistently shows that the need for affordable rental housing is specifically at 50% AMI and below.⁷ For every 100 renters at 80% AMI there are 103 available units, whereas for every 100 renters at 30% AMI there are only 49 units, less than half the needed number.⁸ In the New Orleans-Metairie metropolitan area the numbers are worse: there are still 98 units for every 100 renters at 80% AMI, but only 34 units for renters at 30%.⁹ Thus, OCD needs to prioritize development of *deeply* affordable rental housing that will meet the needs of extremely low income renters, rather than housing for moderate income renters. Further, the impact of disasters inevitably hits lowest rent units the hardest. As landlords rehabilitate units because of hurricane damage, almost all inevitably seek higher rents than prestorm. Disasters tighten the rental market by both temporarily and permanently taking some rental units off-line. This, too, creates the opportunity for even undamaged units to raise their rents. As it stands in the plan, the Middle Market Loan Program is targeted at the “LMI” population, capped at 80% AMI. Under this program, at least 51% of units must be affordable to households earning up to 80% for a minimum of 20 years. Assuming this program requires flat rents calculated based on a hypothetical person’s income at 80% AMI, these units will *not* be affordable for the renters who are most vulnerable- those at or below 30% AMI. The program should be structured, instead, to incentivize inclusion of lower-income units. The Resilient Mixed Income Gap Funding Program, assuming it functions similarly to the CDBG piggyback program post-Katrina, will be critical to development of affordable rental housing. However, the units developed with this funding will be tied to the affordability restrictions in the LIHTC program, 20% at 50% AMI or 40% at 60% AMI. Again, those renters at 30% AMI or below are left out. The Neighborhood Landlord Rental Program, which seems similar to the post-Katrina Road Home Small Rental Program, does not specify the target population or affordability level, so it is unclear whether the lowest income Louisianans will be served by this critical program. In OCD’s response to our comments to the last Action Plan for Hurricanes Delta and Laura, OCD emphasized that its allocation decisions were based on insuring “those with the greatest need are able to be assisted” The current plan, as written, does not serve Louisiana renters with the greatest need. Louisiana’s affordable rental housing crisis was deepened by the 2020 and 2021 storms. The population that most desperately needs rental housing are those at 30% ⁷ *The Gap: A Shortage of Affordable Rental Homes*, National Low Income Housing Coalition (2019), available at <https://reports.nlihc.org/gap/2019/la>. ⁸ *Id.* at pg. 28. ⁹ *Id.* at pg. 29. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 AMI and below, and it is well documented that there are simply



not enough HUD rental subsidies to meet the needs of this population. Therefore, in order to ensure an equitable recovery, OCD must prioritize development and rehabilitation of rental housing for those that need it the most—extremely low-income households at 30% AMI and below. b. **OCD should impose longer affordability covenants and other renter protections as part of its recovery programs.** As written, both the Middle Market Loan Program and the Resilient Mixed Income Gap Funding Program only carry affordability restrictions for 20 years. This is inadequate to meet the state’s long-term affordability needs. OCD should ideally require, and at the very least incentivize, affordability covenants of 30 to 50 years. The Neighborhood Landlord Rental Programs should also incorporate a longer affordability covenant and oversight to ensure ongoing compliance to avoid some of the compliance issues we saw with the Road Home Small Rental Program. The affordable housing development/rehab programs in the Plan must also incorporate mandatory renter protections, including but not limited to: ☐ Mandatory acceptance of Section 8 Housing Choice Vouchers and other tenant-based subsidies (this will also help fill the gap in support for renters at 30% AMI and below, as outlined above); ☐ Good cause eviction protection; ☐ Prohibition on waiver of notice before eviction; ☐ Mandatory cure clauses in leases; ☐ Periodic inspections and oversight to ensure properties meet health, safety, and minimum property maintenance standards; ☐ Mandatory compliance with LHC’s new criminal background screening requirements and review of tenant selection plans. Due to the lack of renter protections in state law, OCD should ensure that when its money is used to house tenants, those tenants are given basic protections to ensure long term housing stability for vulnerable families. c. **OCD should prioritize direct assistance to renters.** We are disappointed to see a lack of direct rental assistance for renters outside of the Permanent Supportive Housing and Rapid Rehousing programs. The current plan contains \$380 million in rebuilding funds for homeowners. Meanwhile, the renters we serve are not only homeless or living in FEMA temporary housing, but also stranded in substandard, storm-damaged units unable to afford to move. Others are stuck in units where they are cost-burdened and vulnerable to eviction. Many property owners have raised rents post-storm after receiving insurance money Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 to renovate. Between damaged units and higher rents, the already deficient supply of affordable housing for renters is even more depleted. Currently, the only source of rental assistance in the plan is \$6 million for Permanent Supportive Housing and \$10 million for Rapid Rehousing. Permanent Supportive Housing is an incredibly important program, and we are happy to see increased funding, as we have many clients on long waiting lists to get in. However, this program only serves people with disabilities who receive certain Medicaid services, so even the most low-income renters do not qualify. The Rapid Rehousing money seems more promising for a broader group of renters, but it is unclear from the description in the plan whether it will serve the broad needs of low-income renters. The Plan states that the program will serve homeless and housing unstable households but does not define what that means. Will renters who are not homeless by HUD’s definition and not living in FEMA housing, but who are experiencing housing instability because of substandard housing conditions, being cost-burdened, or facing potential eviction be served? Furthermore, the maximum of \$1,000 in rental assistance per month does not even cover the 2022 Fair Market Rate for a two-



bedroom apartment in New Orleans, which is nearly \$1,100. It also does not cover the FMR for a three-bedroom apartment in Houma, one of the hardest hit areas post-Ida. The cap of \$1,000 per month disadvantages families with children who may need two, three, or even four-bedroom units. Also, it is not clear from the description whether this money can be used for 3 months or 24 months. (Note that homeowners are eligible for up to 20 months of rental assistance under the plan). The former would be inadequate to ensure housing stability for low-income families. Moreover, most landlords will not rent to a family with inadequate or no income with only a promise of 3 months of assistance. To serve the need, this program should employ the broadest possible definition of housing instability to encompass all survivors. The cap on monthly rent should be raised, and the program should subsidize a tenant's rent for at least 20 months in order to create equity between renters and homeowners in the plan. **(2) It is unfair for Restore Louisiana to only cover people who received a major/severe damage determination from FEMA because it blocks those with significant unmet needs from the Restore program** For applicants to be considered eligible for housing assistance programs under OCD's plan, FEMA must have determined that they sustained at least "major/severe" damage as a result of the storm(s). In relation to homeowners, the plan states: Unless otherwise noted, *the state has defaulted to HUD's definition of unmet need for owner-occupied households*. Owner-occupied properties must have a FEMA real Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 property damage assessment of \$8,000 or greater, personal property damage of \$3,500 or greater, or flooding over one foot.¹⁰ In relation to renters, the plan states: For rental properties, to meet the statutory requirement of "most impacted and distressed," homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA personal property damage assessment of \$2,000 or greater or flooding over one foot for rental households.¹¹ As the quote above reflects, OCD has chosen to default to HUD's definition of unmet needs and adopt it as an eligibility requirement for applicants. In OCD's response to our comments to the last Action Plan for Hurricanes Delta and Laura, OCD stated "OCD's Restore 2020 program guidelines prioritize low to moderate-income homeowners with FEMA-verified major/severe damage in order to insure those with the greatest need are able to be assisted and get back into their homes. The guidelines reflect the letter and spirit of HUDs applicable rules regarding this funding award while prioritizing the most vulnerable populations." Respectfully, as it stands, the plan does not reflect the letter and spirit of HUDs rules. **a. By limiting assistance to those FEMA determined to have major/severe damage, OCD is not following HUD's directive to "identify needs that were not recognized by other programs and funding sources."**¹² 87 FR 6364 details federal regulatory requirements for CDBG-DR funds appropriated by the Disaster Relief Supplemental Appropriations Act, 2022. This regulation requires that HUD direct the CDBG-DR appropriations to the *most impacted and distressed areas*.¹³ HUD uses this FEMA-based standard for unmet needs to determine which *areas*, as a whole, should be classified as "most impacted."¹⁴ By using this standard to determine *individual* eligibility, OCD is misapplying a standard meant to assess which *communities* are likely to have widespread disaster impact. Further, no language contained in 87 FR 6364 requires grantees to determine individual eligibility based on HUD's definition of unmet needs. Grantees are simply



required to “address a direct or indirect impact from the disaster in a most impacted or distressed area.”¹⁵ This regulation also requires grantees to “conduct an assessment of community impacts and unmet ¹⁰ Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 27. (Emphasis added.) ¹¹ *Id.* ¹² Disaster Impact and Unmet Needs Assessment Kit, HUD Exchange, March 2013. See Page 8.

<https://www.hudexchange.info/resource/2870/disaster-impact-and-unmet-needs-assessment-kit/> ¹³ 87 FR 6364, 6369 ¹⁴ *Id.* ¹⁵ *Id.* at 6371. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 **needs to inform the plan and guide the development and prioritization of planned recovery activities.”**¹⁶ The Disaster Impact and Unmet Needs Assessment Kit specifically defines unmet needs as those “that are not covered by other sources and can be covered by CDBG-DR funds.”¹⁷ This definition is broad, showing that HUD’s intention is for the grantee to define unmet needs based on the circumstances of each service area. Further illustrating this point, the Assessment Kit also lists many concepts which “the grantee must keep in mind” while “defining the community’s unmet needs.”¹⁸ The concepts listed are as follows: • CDBG-DR addresses the wider impact of the disaster and not just specific damages • CDBG-DR allows the grantee to identify needs that were not recognized by other programs and funding sources • CDBG-DR looks at needs at a community wide and individual level • Unmet needs are a moving target By stating that grantees must keep these concepts in mind when defining a community’s unmet needs, HUD is encouraging grantees to determine a definition of unmet needs that would most effectively deliver disaster aid to victims in their grant area. Consideration of the concepts listed above by OCD would encourage broader eligibility standards than the FEMA-dependent criteria currently contained in the plan. **b. Requiring a FEMA determination as an eligibility requirement unfairly disadvantages insured persons, who often do not complete a FEMA application knowing they are ineligible for assistance.** As stated, CDBG-DR encourages the grantee to identify needs that were not recognized by other programs and funding sources. The Assessment Kit uses the example that “the FEMA Public Assistance program limits funding to rebuilding only to the pre-disaster state, while CDBG-DR allows for more expansive reconstruction that may include the incorporation of green measures into rebuilding codes and increasing the number of rental units above what were available predisaster.”¹⁹ This same idea can be applied to homeowners and FEMA Individual Assistance. In the majority of cases, individuals with insurance are not eligible for FEMA Individual Assistance. Knowing this, many homeowners with insurance do not apply for FEMA in the wake of a storm, forcing them to rely solely on their insurance policy to provide relief. Individuals with insurance may still have various unmet needs, caused by insurance caps or limits, contractor fraud, insurance ¹⁶ *Id.* at 6365. ¹⁷ Disaster Impact and Unmet Needs Assessment Kit at page 8. ¹⁸ *Id.* ¹⁹ *Id.* Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 disputes, insurance company’s insolvency, and/or other unanticipated circumstances. Yet the proposed plan language would lock them out of Restore Louisiana assistance unless they have over one foot of flooding. This is a very arbitrary criterion for locking people out of Restore Louisiana assistance, since Ida was not primarily a flood event. **Yet people who were insured and therefore ineligible for FEMA would be locked out of this program, too, unless they lived in the limited area that flooded.** FEMA applications are often automatically denied when the applicant indicates they have insurance.



Many SLLS clients received an automatic denial on this ground and were never assigned a FEMA inspector. Without an inspection, the applicant never had a chance to be classified by FEMA into one of the designated loss categories. Under the current plan, individuals in these situations would be ineligible for assistance because they either never applied for FEMA or were automatically denied based on insurance, and as a result were not classified within the “major/severe” damage category. This oversight would allow thousands of Louisiana residents with unmet needs to fall through the cracks. **c. Requiring a FEMA determination of major/severe damage as an eligibility requirement will harm vulnerable populations already overlooked by FEMA.** The Assessment Kit encourages grantees to look at needs at a community wide and individual level. While HUD’s use of FEMA data may be a useful tool in determining community wide needs, it is not nearly as useful when being used to determine unmet needs on an individual level. This is because low-income populations are systemically disadvantaged by the FEMA. Examination of FEMA-distributed data has yielded the following finding: **Among homeowners who applied for FEMA assistance, rates of ineligibility varied dramatically by income level. The denial rate for all homeowner applicants was 26%, but those making less than \$15K/year had a denial rate of 46%. As the household’s income climbed, their likelihood of being approved also increased.**²⁰ In our experience, low income and minority applicants are more likely to have difficulty obtaining the FEMA assistance they are entitled to because they often reside in “unusual” living situations, such as: • Living in property where title has not been transferred for multiple generations, making ownership more difficult to prove; ²⁰ Amelia Adams, *Low-income households disproportionately denied by FEMA is a sign of a system that is failing the most vulnerable, Texas Housers* (Nov. 20, 2018). <https://texashousers.org/2018/11/30/low-incomehouseholdsdisproportionately-denied-by-fema-is-a-sign-of-a-system-that-is-failing-themostvulnerable/#:~:text=Among%20homeowners%20who%20applied%20for,of%20being%20approved%20also%20increased>. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 • Adult siblings sharing an inherited residence, as separate households within a single address; • Being at the mercy of unscrupulous landlords or relatives who put in a disaster claim on their residence, even though the other person does not actually live there; • Having multiple dwellings on a single piece of inherited land. Applications are often denied based on suspected fraud, simple application mistakes, or inadequate FEMA development of the circumstances, even for individuals who should be able to qualify for FEMA Individual Assistance. In the above situations, to overcome this blocked application, applicants have to produce significant documentation and write an appeal. Many do not even consider appealing, because they have not even been given a denial, but have simply been locked out of the FEMA system. Low-income applicants often have greater difficulty overcoming a blocked application due to a general lack of resources, compounded by disability status, illiteracy, no internet connection, unreliable phone service, limited minutes on free cell phones, lack of transportation, and other systemic disadvantages. Thus, when an application fails, many low-income applicants are met with an insurmountable roadblock. As a result, these applicants are left with unmet needs after the storm. Yet, they would be blocked from applying for CDBG-DR funds based on the current eligibility formulation, creating additional roadblocks on their path recovery. The Assessment Kit also



states grantees must consider that unmet needs are a moving target, and states that “as homeowners and businesses receive insurance payments and other funding, or if original funding amounts are altered, their unmet needs may change.”²¹ The plan notes that subsequent circumstances may affect the need of homeowners over time, and we applaud the inclusion of this broad language which allows award calculation to be reevaluated based on increased need. However, the plan does not apply the same logic to victims whose initial FEMA determination was below the eligibility threshold. For example, an SLLS client sustained hurricane damage to her roof and received approximately \$5,000.00 for home repair, based on FEMA’s initial inspection. This amount was not enough to hire a contractor to replace her roof; thus, the client appealed the decision. The client submitted a contractor’s estimate showing FEMA that it would cost approximately \$10,000.00 to fix her roof; however, FEMA only awarded her an additional \$2,000.00. By the time she received this appeal decision, it had been months since the initial damage, which allowed mold to grow inside the home. Now, in order for her home to be safe and sanitary, the client needs to hire a mold remediation service, adding tens of thousands of dollars to her recovery in addition to the cost of a new roof. ²¹ Disaster Impact and Unmet Needs Assessment Kit at page 8. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 Under the eligibility criteria within the plan, this client would not be eligible because FEMA did not determine her structural damage to total more than \$8,000.00. Her inability to procure funds swiftly caused increasing damage, which would not be considered under this eligibility standard because it happened after FEMA’s initial inspection. By basing eligibility on FEMA’s initial damage determination, OCD is not factoring in the evolution of hurricane survivors’ needs over the course of long-term recovery. In public meetings discussing this plan, many Louisianans voiced concerns that they were denied FEMA but were unable to successfully appeal that decision for various reasons. OCD representatives responded by encouraging them to contact FEMA and try to have them increase their damage determination. In our experience working with FEMA, this is not an adequate solution. FEMA requires that applicants appeal within 60 days of receiving a denial letter.²² FEMA does allow extensions of this deadline with sufficient justification at their discretion but will only consider an extension within 90 days of the original deadline.²³ It has now been over seven months since the FEMA application deadline for Hurricane Ida has passed. The significant passage of time makes it incredibly unlikely that FEMA would allow an appeal at this stage. **Thus, OCD’s suggestion that homeowners rely on FEMA to correct damage determinations at this point is not a viable solution.** In order to best assess the unmet needs of all individuals in areas most impacted by Hurricanes Laura and Delta, OCD should revise the Restore program’s eligibility requirements as to not automatically deny those with a FEMA damage determination below the major/severe level. As the above-named examples indicate, disaster victims with the greatest unmet needs are often low-income individuals who have met a barrier in dealing with FEMA that they could not overcome. An individualized consideration of applicants that fall into this category would allow OCD the ability to reach those populations most in need, rather than automatically denying them and further penalizing them for circumstances beyond their control. The other eligibility criteria for each program will provide a sufficient gatekeeping function without also requiring a FEMA damage assessment over a certain level. OCD should fulfill its goal of meeting the

unmet needs of vulnerable Louisianans by assessing each individual applicant’s situation holistically. (3) **The “Flood Insurance Program” eligibility threshold should be increased to 120 percent AMI to increase equity and maintain consistency throughout the plan.** The plan correctly acknowledges an estimated *seventy-three percent* of homeowners whose property sustained damage in the MID areas *did not have insurance*.²⁴ One reason for low take- 22 FEMA, Individual Assistance Program and Policy Guide, May 2021, page 66. 23 *Id.* at 271. 24 Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 25. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 up rates for insurance, particularly flood insurance, is that premiums are often cost-prohibitive for lower-income households. In the aftermath of a storm, the cost of flood insurance in the affected areas increases by flood plain rezoning.²⁵ In 2018, the average flood insurance premium along the Gulf Coast was \$5000.00.²⁶ Standard homeowner policies in Louisiana and across the United States do not cover flood damage; purchasing and maintaining costly flood insurance policies poses significant financial strain for households under the median income wage. For senior citizens living on a fixed income who have secured reverse mortgages, the disproportionate cost of flood insurance can inevitably lead to foreclosure.²⁷ As the plan correctly states: It is safe to conclude that flood is likely to remain HUD and LA MID’s and the entire threatening hazard. This is because floods are the state’s costliest, most ubiquitous, and most life-threatening hazard. This is because floods are the by-product of several other hazards including thunderstorms, tropical cyclones, coastal hazards, dam failure, and levee failure.²⁸ Accordingly, taking measures to reduce the cost of flood insurance would significantly improve the disaster resilience of low to moderate-income households statewide. Commendably, the proposal acknowledges plans for flood insurance assistance in conjunction with rehabilitation and reconstruction of owner-occupied homes.²⁹ Specifically, allowing an exception for applicants under 120 percent AMI that were unable to keep flood insurance is a major step toward increasing equity throughout the program. The Flood Insurance Program, which provides a year of initial-required flood insurance coverage to low-income households, is also a step toward increasing equity. However, the plan identifies eligible applicants as those “at or below 80 percent AMI adjusted for household size.”³⁰ **To increase equity and maintain consistency throughout the plan, this eligibility threshold should be increased to 120 percent AMI.** The “Flood Insurance Requirements” section of the plan factors in applicants between 80-120 percent AMI and recognizes that those households may have trouble maintaining flood insurance. The same logic should apply to applicants who 25 Lone Star Legal Aid and Texas Rio Grande Legal Aid, *Legal Needs After a Disaster* (Sep. 24, 2018), https://www.disasterlegallaid.org/library/item.689188-Legal_Needs_After_a_Disaster. 26 Carolyn Kousky and Helen Wiley, *Improving the Post-Flood Financial Resilience of Lower-Income Households through Insurance*, at 2, (Jan. 2021) https://riskcenter.wharton.upenn.edu/wp-content/uploads/2022/04/Improving-LMI-Household-Flood-Insurance-Options_Issue-Brief.pdf. 27 Consumer Financial Protection Bureau, (Sep. 24, 2021), <https://www.consumerfinance.gov/ask-cfpb/do-i-stillneed-to-pay-my-property-taxes-and-home-insurance-with-a-reverse-mortgage-loan-en-235/> 28 Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 91. 29 *Id.* at 15. 30 *Id.* at 113. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698

need initial flood insurance coverage, yet may struggle to afford it, creating a barrier to accessing other program funds. **(4) OCD should account for the consistent problem of contractor fraud among low-income disaster victims by specifically tailoring program eligibility to include victims of contractor fraud** Contractor fraud is a foreseeable risk in the aftermath of any natural disaster. A cursory search on Google for “contractor fraud in Louisiana” will return several results with the same information. Essentially, recognizing and reporting contractor fraud is left to the individual themselves.³¹ The materials that aim to help citizens hire a licensed contractor are often not tailored in a way that reflects the average education level of Louisiana’s indigent population.³² Further, the majority of this information is online. As discussed in heading six of this comment, not all Louisiana residents have access to the internet, especially those in remote and rural areas. Many low-income disaster victims, without adequate funding resources to recover or desperate due to the difficulties of finding an available contractor, make decisions out of desperation with negative long-term impacts. An example of such a decision is hiring the services of a contractor who turns out to be fraudulent. While reports to the Louisiana Attorney General and local District Attorney’s office are potential avenues to finding justice after contractor fraud, this very rarely results in the victims of contractor fraud being made whole. Although Louisiana imposes criminal liability for contractor fraud, the number of claims that end up going to court are abysmal compared to the number of instances alleged. In fact, since 2015, there have been less than 100 cases of contractor fraud brought before the courts in southeastern Louisiana. According to a 2021 interview with Brad Hassert, compliance director for the state board that issues contractor licenses, the issue is due partially to law enforcement’s lack of industry knowledge and because it is challenging to locate out-of-state fraudulent contractors.³³ Moreover, Louisiana’s licensing board cannot conduct investigations or prosecute unlicensed contractors.³⁴ ³¹ See NOPD Public Affairs, NOPDNews, NOPD Reminds Citizens to Be Aware of Contractor Fraud During Hurricane Ida Recovery, (Sept. 7, 2021), <https://nopdnews.com/post/september-2021/nopd-reminds-citizens-to-beaware-of-contractor-fr/> (stating residents should be aware of contractor fraud and providing tips on how to report contractor fraud. Providing residents with the contact information for the contractors licensing board.) ³² In 2020, about one million Louisiana residents 25 years of age and older had a high school degree or equivalency as their highest level of education. 279,523 Louisiana residents of the same age attained some high school education without receiving a diploma; 135,046 Louisiana residents aged 25 years and older did not attain a high school education. Erin Duffin, *Educational attainment in Louisiana 2020*, (Jan. 17, 2022), <https://www.statista.com/statistics/1024444/educational-attainment-louisiana/>. ³³ Greg LaRose, *WDSU Investigates: Most contractor fraud convictions involve locals; out-of-towners harder to track*, (Nov. 23, 2021), <https://www.wdsu.com/article/wdsu-investigates-most-contractor-fraud-convictions-involvelocals-out-of-towners-harder-to-track/38148997>. ³⁴ *Id.* Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 For example, an SLLS client received approximately \$35,000.00 from her insurance company to help rebuild her home after Hurricane Ida, which she used to hire a person she believed to be a contractor. After doing minor water mitigation work, the contractor left town and stopped returning her calls. She reported the contractor to all of the above-

mentioned officials, with no fruitful response. This series of events left her victims with disaster-destroyed homes and no funds to rebuild, and unfortunately, she is not the only disaster victim in this situation. Contractor fraud leaves many disaster victims with a significant unmet need that is well-suited to be more specifically addressed by the plan. OCD rightfully acknowledges that funds unavailable to the applicant should not be considered in a duplication of benefits analysis, and specifically notes contractor fraud as one of these instances.³⁵ However, the phrase “contractor fraud” only appears twice throughout the entire plan. The scope of the problem for low-income applicants necessitates that OCD add specific language to the plan including victims of contractor fraud as eligible disaster victims. **(5) The plan can improve accessibility and ensure that vulnerable populations will be equally served by expounding on targeted outreach strategies.** As the plan correctly notes, “many of Louisiana’s most disaster-prone – and historically impacted – geographies are co-located with pockets of vulnerable populations, including concentrations of poverty and populations of various racial and ethnic disparity.”³⁶ Disaster victims who are elderly or are experiencing poverty, homelessness, or disability will have additional hurdles in disaster recovery. Thus, addressing accessibility issues within the plan is imperative to ensure that all disaster victims are treated equitably. In reference to the Restore Program, the plan states that “the Program, through specific targeted outreach events, will attempt to reach vulnerable populations with information and available resources regarding the Program.”³⁷ However, throughout, the plan does not give any specific detail regarding how vulnerable populations will be reached. Generally speaking about citizen-engagement strategies, the plan states: “strategies include but are not limited to public hearings, social media outreach, earned media engagement, traditional marketing around the availability of the draft action plan for public review, and additional targeted outreach in the 22 HUD-declared MID areas from Hurricane Ida.”³⁸ The strategies listed in this statement are undoubtedly needed, but alone, they do not provide a robust outreach strategy, particularly for reaching vulnerable populations. ³⁵ Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 96. ³⁶ *Id.* at 40. ³⁷ *Id.* at 133. ³⁸ *Id.* at 14. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 Public hearings, for example, often are not accessible for low-income, elderly, or disabled individuals due to lack of transportation, inability to take time off of work, physical inability to travel outside of the home, and other environmental factors. Further, outreach done solely via the internet is also insufficient. According to the United States Census Bureau, 22 percent of Louisiana households do not have internet access, while an additional 14 percent of households have cellular data plans as their only source of internet access.³⁹ This is caused by a combination of deficient rural broadband networks and the expense of maintaining internet services for low-income households. The average monthly cost of internet services is 55 dollars, which is more than an entire day’s pay for someone earning minimum wage. Therefore, it is difficult, if not impossible, for many Louisiana residents to access information contained solely on the internet. The vague intention of providing “targeted outreach events” to reach vulnerable populations risks falling short when the plan is put into action. The plan should be revised to include specific means of targeted outreach directed at vulnerable populations, such as mailing informational fliers, newspaper ads, targeted phone calls, and

in-person community meetings. These strategies, in addition to the outreach strategies named in the plan, can help to ensure vulnerable populations are not left in an information gap. Another accessibility barrier will be ensuring eligible applicants receive and successfully complete the application process. As stated in the public hearing on the plan, held June 21, 2022, applicants must complete a survey prior to an application, making completion of the survey an eligibility requirement. Currently, the survey is accessible via the internet, which will be an insurmountable barrier for many low-income, elderly, or disabled applicants. While the plan states that the survey can also be completed via the phone,⁴⁰ this is not made obvious by OCD's website or OCD's other published material. Many elderly or disabled applicants will struggle to do a phone survey, and if they cannot do so, they would be barred from receiving aid. Therefore, it is imperative that OCD disseminate the survey via multiple methods to ensure applicants are able to complete it. Further, in-person application sites should be considered to allow those with disabilities or other cognitive issues to receive assistance in completing their application. ³⁹ US Census Bureau, American Community Survey, Table S2801, 2018.

<https://data.census.gov/cedsci/table?q=S2801&tid=ACST5Y2020.S2801> ⁴⁰ Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 44. Doc ID:

f889b40a9f477c4d8cf155b15341872cc33be698 **(6) Rather than give vague assurances buried in documents accessible to English speakers, make applications, notices, and the program manual, all of which are vital documents, available in Spanish and Vietnamese.** As correctly noted by the plan, it is important to include special consideration for those with limited English proficiency ("LEP") to ensure they have equal access to the program.⁴¹ Recipients of federal funds, such as OCD, are required to take reasonable steps to ensure LEP individuals have meaningful access to their programs.⁴² Specifically, OCD must identify significant LEP populations in their service area⁴³ and consider providing them translations of vital documents, including applications to receive program benefits or services and complaint forms, without LEP individuals needing to request such.⁴⁴ While the plan correctly identifies that LEP is important, in practice, OCD should reevaluate its LEP provisions to ensure full compliance with federal requirements. The plan states that translations will be available upon request during the application process.⁴⁵ However, under both the USDOJ and HUD guidance, applications to receive program benefits or services are considered vital documents.⁴⁶ Similarly, several of the documents accessed through the Restore Louisiana website are vital and should be translated. The survey form—the required first step towards applying to receive program funds—is already accessible and intended to be completed by prospective applicants, but it is only available in English. This does not consider that, of the MID parishes' total household population of 989,176, 12,978 LEP households spoke Spanish (1.3%), 3,351 spoke Other Indo-European languages (0.3%), and 4,812 spoke Asian and Pacific Island languages (0.4%).⁴⁷ Thus, if this required survey is not offered in Spanish and Vietnamese, it will almost certainly prevent thousands of disaster victims from applying. ⁴¹ *Id.* at 73. ⁴² In 2000, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," 3 C.F.R. 13166 (2001), and associated USDOJ policy guidance ("Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,"



67 Fed. Reg. 41455, updated in 2002) provided clarification to federal agencies on compliance with their Title VI LEP obligations. In 2007, HUD released its own guidance (*Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, 72 Fed. Reg. 2732) on Title VI compliance regarding LEP individuals. 43 HUD LEP Guidance, 72 Fed. Reg. at 2745; USDOJ LEP Guidance, 67 Fed. Reg. at 41465. 44 HUD LEP Guidance, 72 Fed. Reg. at 2740; USDOJ LEP Guidance, 67 Fed. Reg. at 41459. 45 Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 73. 46 HUD LEP Guidance, 72 Fed. Reg. at 2744; USDOJ LEP Guidance, 67 Fed. Reg. at 41463. 47 These numbers were calculated by adding up the relevant data provided by the U.S. Census Bureau, Household Language by Household Limited English Speaking Status, https://data.census.gov/cedsci/table?q=limited%20english%20proficiency&t=001%20-%20Total%20population%3ALanguage%20Spoken%20at%20Home%3APopulation%20Total%3APopulations%20and%20People&g=0400000US22_0500000US22005,22007,22033,22037,22045,22047,22051,22057,22063,22071,22075,22077,22087,22089,22091,22093,22095,22099,22101,22103,22105,22109,22117,22121,22125&tid=ACSDT5YSPT2015.B16002 (last visited June 22, 2022). Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 The program manual, once finalized, should also have a translated version uploaded, as it is OCD’s communication to the public regarding the program’s policies and procedures. And while the plan does not make any claims as to these documents, OCD should ensure that it provides translated copies of the complaint form and applications that so far are only uploaded to the 2016 Restore Louisiana website in English. Its notices, as to eligibility decisions, and needed information, too, are “vital” for people to participate in the process and need to be translated. Currently, the plan only promises to provide information about how to file a complaint on “all program applications, guidelines, and sub-recipient websites in all local languages, as appropriate and reasonable,” but not to translate the complaint form itself.⁴⁸ The current Restore Louisiana website’s sole provision of contact information for translation services, located in the answer to a question on the FAQs page as well as in English, is also totally insufficient notice to LEP individuals that free translation services are available. LEP disaster victims may not be able to navigate the OCD website, published in what is to them a foreign language, to find the translation services. They certainly should not have to navigate a list with 32 questions, many with lengthy answers, in *a foreign language* to find a statement *in a foreign language* that translation services are available. Further, notices of available translation services should be provided in languages the LEP individuals will understand, as with a classic “babel notice.” Requiring that LEP disaster victims request translation of the documents on the spot is harder for both applicants and OCD. While OCD claims it will provide translation services upon request, this system is susceptible to clerical error and bureaucratic delays. Requiring that disaster victims request translation services will create more work for OCD as personnel will have to process each individual request. Providing these vital documents in Spanish and Vietnamese from the beginning, without requiring individuals to request translation services, would be beneficial to both OCD and provide greater access to LEP disaster victims. Thank you for your time and attention. Respectfully Submitted, Hailey Manint Staff Attorney,



Disaster Legal Relief Southeast Louisiana Legal Services 48 Louisiana Office of Community Development, Substantial Action Plan Amendment No. 1, page 75. Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698 Hannah Adams Staff Attorney, Housing Unit Southeast Louisiana Legal Services Mallory Flynn Staff Attorney, Disaster Legal Relief Southeast Louisiana Legal Services Doc ID: f889b40a9f477c4d8cf155b15341872cc33be698

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The action plan does address affordable rental programs. Contractor fraud with the required supporting documents is not counted as a Duplication of Benefit in the Restore Louisiana Homeowner Assistance Program. Restore Louisiana applicants that experienced contractor fraud should review the AFWA/Contractor Fraud link on our website at <https://restore.la.gov/>. The website also includes several helpful resources, such as Top Tips for Hiring a Contractor; Preparing for Reconstruction Checklist, etc. OCD understands the concern related to the FEMA IA major/severe classification for initial eligibility. However, the funding provided to the State is based off this FEMA IA database for unmet needs as noted in the HUD Federal Notice. Unfortunately, there are not enough funds provided to meet all the unmet needs (minor). The State will monitor the programs expenditure rate and make further amendment proposals to HUD when it is able to demonstrate the current unmet need identified by HUD has been met should remaining funds be available.

TRIBAL CONCERNS

COMMENT: On behalf of the Pointe-au-Chien Indian Tribe, I attach the Tribe's comments on the LA Substantial Action Plan Amendment No. 1 for the Utilization of CDBG Funds in Response to 2020 and 2021 Federal Declarations in Louisiana. POINTE-AU-CHIEN INDIAN TRIBE Chairman Charles "Chuckie" Verdin Second Chairman Donald Dardar PO Box 416 Montegut, LA 70377 (985) 466-3129 On behalf of the Pointe-au-Chien Indian Tribe, we submit these comments in response to the proposed action plan for Hurricane Ida. Tribal leaders and staff attended the public session on June 29 at the Houma Municipal Building. We were thankful for the opportunity to learn more the State's plans to request and implement funding.

BACKGROUND

The Pointe-au-Chien Indian Community is one of oldest inhabited communities in the United States. Historically, Tribal members were fishermen, hunters, and farmers. While the Tribal community continues to be a fishing community, the environmental problems threaten the continued existence of the community. Since oil and gas were discovered in the Tribal territory in the 1930s, the Tribal community has suffered from coastal erosion, land loss, increased salinization, hurricane winds, flooding, and sea level rise. The Pointe-au-Chien territory is in Terrebonne and Lafourche Parishes and includes diverse resources, including birds, plants, animals, fish,

cemeteries, sacred sites, and village sites. As a frontline community located in the fastest eroding basin in the United States, the Terrebonne Basin, it serves as the last line of defense for coastal Louisiana.¹ While every home received some damage from the storm, approximately 88 homes were either totally destroyed or substantially damaged from Hurricane Ida resulting in displacement of Tribal families.

1 https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2742326

PROBLEM The cultural heritage and lifeways of the Pointe-au-Chien people are threatened by the changing environment. Due to the changing environment, entire tribal villages have been abandoned. Many of the Tribe's members currently reside in lower Pointe-au-Chien and the vast majority live in Terrebonne and Lafourche Parishes. The adaptation measures taken by Tribal members have not been sufficient to withstand the increased hurricane strength, and the lack of resources has prohibited Tribal members from hardening their homes for the increased winds. There has been insufficient investment to address these changes. *On August 29, 2021, Hurricane Ida landed in Pointe-au-Chien causing mass destruction, leaving only twelve homes in the Tribal village habitable.* Federal resources are not sufficient to support equitable rebuilding, and the Tribal territory lacks sufficient restoration projects. Further, many of the state's projects have focused on provided enhanced fishing opportunities for sports fishermen and not on creating a sustainable residential community.² The current water source to the homes is not drinkable and often has brain-eating amoebas.

2 <https://coastal.la.gov/point-aux-chenes-wma-enhancements/>. 3 <https://www.crcl.org/copy-2-of-sab-press-release>.

TRADITIONAL TRIBAL PROPERTY/FAMILY PROPERTY The current goal is to ensure that families are in safe temporary housing and have the resources to rebuild. Most of the homes on the Lafourche side of Lower Pointe-au-Chien are located on *family property* and the designation of homesites are determined by Tribal law. Only one or two homes in lower Pointe-au-Chien have insurance due to the prohibitive cost for insurance, and most of the homes were not hardened to adapt to the extreme winds caused by a Category 4 or 5 hurricane. Because the homes are on traditional Tribal land, families are not eligible for buyouts because they cannot alienate the land, and they have not received sufficient or equitable support to adapt to the changing conditions that were caused by outside forces through the exploitation of the Tribe's natural resources. This has made Tribal families more vulnerable to storm surge and hurricane winds. Because most families want to stay in the community, many are living in structures that are not safe, and some are fixing structures that will not withstand future storms.

Although Pointe-au-Chien has state recognition as an Indian Tribe, the lack of federal status as an Indian Tribe inhibits its ability to access federal resources for restoration and rebuilding.



CURRENT ADAPTATION MEASURES Current adaptation measures include elevation of homes to withstand flooding, temporary measures such as hesco baskets installed until the levee system is complete, a levee system (Morganza-to-the Gulf) that will protect the current village from flooding, and a floodgate to prevent flooding from the bayou. In addition, the Tribe successfully implemented an oyster stabilization project³ to protect one threatened mound and has a small grant to backfill an oil canal.

OCD AMENDMENTS TO ADDRESS IDA The Tribe has reviewed Proposed Amendment #1 and provides specific comments below. Pointe-au-Chien Tribal members meet the definition of vulnerable populations under the Proposed Amendment #1.

Business Support

Many Tribal members are commercial fishermen. Many of their boats, bank nets, crab traps, and other items used for fishing were damaged or destroyed during Hurricane Ida. During the recent shrimp season, there was not enough ice for all the fishermen to maintain their catch. In addition, the shrimp prices were low, and the fuel prices were high, which impacts the ability of our local fishermen to make a living. The Tribe is supportive of investment in small businesses, especially support of local shrimpers, crabbers, and oyster harvesters, as well as improving on the shrimp factory in our area that was damaged by Hurricane Ida. The Tribe would like to see marketing of the local seafood from Bayou Pointe-au-Chien to increase price and support for local fishermen and fisherwomen. The Tribe is opposed to additional small businesses that increase sports fishing, while ignoring local residents. After Ida, the local grocery store owned by Tribal members closed. The Tribe would like to see support to reopen a locally-owned grocery store. The Tribe would also like support for diverse economic development that benefits local Tribal residents.

Water/Sewer Improvements

After Hurricane Ida, the Tribal community did not have electricity or water for a month. The current plan does not include any funding for sewage/water improvements. Pp. 105-106. It would be ideal to implement sustainable and environmentally friendly options to ensure that homes, such as cisterns for fresh water, effective treatment of greywater. Some homes in Pointe-au-Chien do not even have septic tanks but have cesspools. Many of the septic tanks are old and lack aerators. The Tribe would like to see septic and water solutions included in the funding options.

Interim Housing

Hurricane Ida is the worst storm to hit our Tribal community. There are few contractors available, and FEMA trailers have arrived slowly. Some tribal members are still waiting on units. Tribal members prefer to be in the

community so that they can work towards rebuilding. Further, many are fishermen and need to be in the community for their livelihoods and subsistence purposes. Tribal members need support to stay in FEMA trailers until their homes are rebuilt or repaired. Because many Tribal members are directing all funds to rebuilding, they do not have extra resources to also pay rent.

Rebuilding/Repair Funds

Many Tribal members lack sufficient resources for the increased cost of insurance. No investment has been made to ensure that housing meets the demands of the increased storm strength. In the late 1940s, tribal members lived in mud/moss or palmetto homes, and then plank homes on the ground. With increased flooding, Tribal members begin elevating homes, but these homes were not sufficiently hardened to withstand hurricane strength winds. The Tribe is supportive of measures that provides sufficient resources for Tribal members to build or repair homes that will be hardened to meet the current and future environment.

The Pointe-au-Chien Indian Tribe supports the development of a PAC Rebuilding Resiliency Project that will not only focus on building resilient and sustainable homes that will withstand the changing climate but will include adaptation measures to support long-term restoration for the Tribal territory. This is an opportunity to invest in a traditional community and create a model for resilient coastal living. We are also supportive of funding for low- and moderate-income homes to receive funding for new construction that are elevated, with strong roofs, and hardened to withstand category 5 hurricanes. Our concern is that many of our tribal members who live on traditional tribal property/family property may not be eligible. *We urge you to include full funding to individuals who live on tribal property or family property.*

The Tribe is also supportive of safe room construction and wind retrofit of structures. We are specifically interested in safe room construction for elevated homes.

Insurance Support

We are also concerned about the prohibitive cost of insurance as a requirement for eligibility. Homes that are eight or even fifteen feet in the air, can often not afford the prohibitive cost of flood insurance and homeowners' insurance. Elevating these homes also put the homes at more risk of hurricane wind damage, while minimizing the risk of flooding. The Tribal community is currently in the uncompleted Morganza-to-the Gulf levee system. When complete, we hope that the elevation requirements will be lowered and that the flood insurance costs will be reduced. The Tribe is in support of using grant funds to assist with flood insurance.

We urge consideration of Tribal members for funding if they received Road Home funds and raised their homes, but did not maintain flood insurance. If their homes were above the flood level and flood insurance was cost



prohibitive, and Hurricane Ida was not a flooding event in our community, we do not think that Tribal members should be penalized for not maintaining flood insurance. This is an equity issue since the cost of flood insurance is also linked to our community being one of the last parts of the Morganza to be complete.

Drainage Improvements

The Tribe supports improved drainage measures in our community. After Ida, pumps on both the Terrebonne and Lafourche side of the bayou either were not on or were inoperable.

Outreach Events

The Tribe would be happy to host an outreach event at our Tribal building once funding becomes available. We encourage the State to use Indian French interpreters to help elders with the process. Many elders do not have internet or smart phones and will need help with the application process.

The process to rebuild has been slow. We need long-term investment to address the rapid changes to the environment. Our tribal members need assistance in both the long and short terms. Our goal is that Tribal members will have resilient homes so that our community, culture, and traditions can continue into future generations. We encourage you to meet with us to learn more about our community and our needs. We hope that the funding can be used to help our Tribal members rebuild in a safe and resilient manner.

If you have any questions, please feel free to contact us or our Tribal attorney Patty Ferguson-Bohnee at pafergus@asu.edu.

Sincerely,

Chairman Charles "Chuckie" Verdin

(985) 856-5336

Second Chairman Donald Dardar

(985) 852-0659

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program will encourage small business participation in the programs established by the local governments giving specific requirements to consider underserved and disadvantaged communities. Small business owners may also be eligible for assistance under the Small Business Loan and Grant program.



Water/Sewer Improvements may be eligible for funding with the proposed Resilient Communities Infrastructure Program. The program policies will be available on the Restore Louisiana website once the programs are launched. We appreciate your input and will follow up with you as we develop the program policies.

SBA

COMMENT: Contained herein are comments related to the Disaster Recovery Action Plans for Louisiana for 2021 and 2022. We appreciate the opportunity to express our thoughts on the proposed plans for Disaster Recovery for Hurricanes Laura, Delta, Ida, and the Spring Floods.

Small Business Grant and Loan Program:

Since the program will likely consist of partially forgivable loans, rather than grants and loans, we would suggest eliminating the word “grant” entirely from the public title of the program. Working a publicly funded loan program for small businesses, it can be a great challenge to help people to understand that grants for for-profit businesses are non-existent. Using the term grant is misleading, and because the Restore 2016 recovery program transitioned from “ ‘grant’ and loan” to partially-forgivable loans, now may be the opportunity to phase the “grant” language out altogether to avoid confusion with this small business program and future programs.

p. 111 – Flood insurance program was included to assist homeowners but wasn’t addressed for the Small Business G & L Program. Please consider including small business loan recipients access to additional funding for flood insurance on business property due to the increase (and anticipated further increase) in flood insurance costs and strenuous requirements that these business loan recipients have flood insurance in place for the life of the loan. Refer to p. 100 where business technical assistance and mitigation support for impacted businesses is addressed, cost of insurance may be included here as well as a goal for businesses to remain viable during and after future disasters.

p. 147 – The maximum loan for the Small Business Grant and Loan Program is \$50,000 with exceptions for any amount over that up to \$150,000. In the original Restore Small Business Program for the 2016 Floods, SCPDC awarded loans to 226 individual businesses, and only 14% (or 32 loans) were below the \$50,000 threshold. We would suggest that the standard maximum be the \$150,000, as 86% of recipients were awarded over \$50,000. In fact 119 of the 226 borrowers, more than half, were awarded the maximum of \$150,000.

p. 147 – Program Method of Distribution/Overview states “reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures”. In administering the original Restore Small

Business Program for the 2016 Floods, SCPDC was instructed to use all post-flood event equipment replace/repair expenses as eligible for reimbursement. In doing what we referred to as “Round 2” after the

SBA duplication of benefits issue was addressed, we were then instructed that only replacement and repair expenses that were eligible would have to have been incurred AFTER the date of the application. Please consider a consistent rule for this issue. We would suggest that all replace/repair expenses incurred after the event, not after the application date, be eligible.

p. 149 – in Criteria for Selection, the word “prioritize” can be misleading for businesses who don’t quite meet these criteria, when we recognize that some of these criteria are absolute CDBG requirements. For example

- “were open prior to the disaster” suggests that a start up business MAY be eligible after other prioritized businesses receive awards.
- Is an owner considered and “employee” as it is required that a business have “1-50 full time equivalent employees”?

Regarding LMI determinations/documentation/reporting – in programs past, there has not been clear instructions on how to collect and report on Low-to-Moderate-Income determination/documentation/reporting. If we knew in advance what the required reporting and/or outcomes should be, we could develop our own process for collecting and documenting such data and reporting on the outcomes. It has been unclear and inconsistent, leading to incomplete and questionably accurate data and reporting.

LMI/Disadvantaged/Vulnerable/Distressed communities – in programs past, working with OCD as well as other entities, it has been difficult to identify those areas. Even working through our planning department at SCPDC, those areas seem to be subjective and anecdotal. As part of the OCD public comment meetings presentation, those areas were identified on a map, but if OCD were to provide lists of specific addresses/communities/neighborhoods, seeking out applicants identified as LMI/Disadvantaged/Vulnerable/Distressed would be a significantly more efficient task as it relates to outreach for promotion, application assistance, eligibility determination, etc.

Outreach – it has been suggested that there be Restore offices in every affected parish, or possibly multiple in the larger or more populated parishes, but the Loan Department feels that there can be outreach to vulnerable/distressed communities with a more efficient and targeted approach. If OCD provides a space, similar to where the public comment meetings were held, from where various Restore contractors for the different programs could operate, that could be a central satellite for a region, and the providers could travel to the more rural and remote locales to assist the more disadvantaged populations.

General:

p. 63 – based on \$6.8 BILLION in damage to business structures and \$2.2 BILLION in damage to business equipment, if \$120 million is available for economic revitalization, but \$75 million is reserved for parish and local governments and political subdivisions through the Hometown Revitalization Program. This leaves only

\$45 million direct to small businesses. We suggest that this split (\$45 mil/\$75 mil) be more fluid, and allow for more direct funding to small businesses, if that demand is greater than anticipated. During the public meetings, there was discussion of how these funds would be allocated among the various eligible entities, and we would suggest that the splits have some basis in severity of damage versus sheer number of impacted units/structures/businesses/etc. For example, Jefferson and Orleans experienced the largest number of businesses impacted, but the severity of the impact for individual businesses in Lafourche, St Charles, St John the Baptist, and Terrebonne was considerably greater.

Unknown reference in action plan – although the Action Plan doesn't state (we could not find the reference) that the FEMA registration number and determination are required for the Homeowner Assistance Program, and required to complete the survey, we find this may be problematic and suggest other alternatives to determine eligibility and severity of damage, such as SBA, insurance documentation, substantial damage determinations from local government, other verified 3rd party sources.

	no. of household damaged		severe damage		businesses damages		total allocation	
Laura/Delta	40,388	1 8 %	14,160	1 7 %	\$ 4,204,800,000	3 2 %	\$ 1,050,267,000	4 5 %
Ida/SF	183,636	8 2 %	69,157	8 3 %	\$ 9,000,000,000	6 8 %	\$ 1,272,346,000	5 5 %

pp. 104-105, 161-163 – refer to the table below...

We are aware that there will likely be additional funds allocated to Ida recovery, and although we are enthusiastic about the funds already allocated and the prospect of substantial recovery that the current allocation can deliver, the funding for Ida is clearly disproportionate to the damage sustained in relation to Laura/Delta. SCPDC is prepared to contract with OCD all small business related programming regardless of the eligible areas, as we have in the past, but we would like to emphasize the appeal for subsequent Ida recovery funding.



Thank you again for the opportunity to submit these comments, and we look forward to the final product and working with you for the betterment of our State into the future.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The draft policy document for the Restore Louisiana Homeowner Assistance Program is on the Restore Louisiana website. The Small Business Loan and Grant Program policies will also be available on the Restore Louisiana website once the program is launched. We appreciate your input and will follow up with you as we develop the program policies. The HUD Federal Register Notice identifies how HUD determines an unmet need based on the FEMA Individual Assistance data. The HUD allocation provided to the state of Louisiana is based on HUD's assessment of unmet need which is documented in the amendment (note pg. 26-29). Therefore, the state prioritizes eligibility based on this analysis and the allocation from HUD along with the additional rules required through the Federal Register Notice. HUD has not allocated a provision of funds that would allow the state to adequately serve those identified with minor damage by FEMA. Therefore, the proposed policies are implemented on the limited funding and with the intent to serve those with major or severe damage as the priority.

FEMA

COMMENT: 6.30.22

1. Eligibility Requirement of FEMA determination of severe/major damage: While it is not disputed that this is a great tool to consider in evaluation of eligibility, unfortunately, due to a number of factors, it limits those who are even considered and therefore excludes many who may be the most vulnerable and at risk. Among the factors to consider are:
 - a. Lack of access and information often restricts the most vulnerable from accessing the FEMA appeals process in order to properly evaluate property damage.
 - b. Lack of contractors and/or ability to pay a contractor for an estimate of damage additionally limits an individual's potential success in a FEMA appeal process. The FEMA process is no longer open for Laura impacted individuals to receive assistance or appeal their awards.
 - c. COVID further complicated these processes by the need for virtual services by FEMA and their inspectors.
 - d. While the expansion of FEMA's eligibility criteria especially for documentation and heirship related properties through it's equity initiative opened additional opportunities for Ida survivors, because it did not become effective until after Laura/Delta, those survivors did not benefit from



that loosening of criteria and potentially those who may have been eligible under the new criteria didn't apply or did not appeal when denied.

- e. Ida survivors were displaced outside of their home parishes and in many cases their state (10 other states supported TSA) due to the lack of temporary shelter available in in the state. This displacement meant that they did not receive communication from their home parishes, missed opportunities for inspections or had to do remote or third-party inspections.

2. Duplication of Benefits

- a. If non-profit assistance is being used as a DOB, how is that being checked or calculated? Does there have to be a document of record that these services were performed in order to be considered in the DOB?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. In response to question #1, the data mentioned is exactly what HUD uses when preparing an unmet needs assessment and ultimately the allocation to the state. Therefore, the budget and program designs are based on how the funds are allocated to Louisiana to ensure these homeowners impacted with major/severe are prioritized first. The state may upon remaining budget funds expand that eligibility especially to vulnerable populations that may have experienced minor damage. In response to question #2, Applicants are under an obligation to comply with any program request for verifying documentation that supports a self-certification, even after awards have been granted and applicant files have been closed. All duplicative funding received must be remitted to or accounted for, regardless of when it is received by the applicant.

CLIMATE CHANGE

COMMENT: Thank you for the opportunity to comment on the Allocation of Funds for Hurricane Ida. After reviewing this Amendment, I would like to offer the following comments and recommendations for your consideration. As manager of the Governor's Climate Initiative, I would like to offer the following comments and recommendations to ensure close alignment of this Action Plan with the Governor's Climate Action Plan (CAP) which was approved by the Governor's Climate Task Force and adopted by Governor Edwards early this year.

With this in mind, I appreciate the Amendment's programmatic and nuanced focus on increased access to housing and equitable recovery from disasters. This overarching objective, and the programs within, align with many of the Climate Action Plan strategies and actions that primarily seek to reduce greenhouse gas emissions to net zero by 2050. However, with intentionality, climate mitigation and climate resilience goals can often complement one



another. Below I highlight specific areas of overlap and recommend potential further collaboration to maximize implementation in both our efforts.

Construction Standards and Housing Programs

I commend the amendment's comprehensive approach to post-disaster housing assistance, from rapid rehousing to permanent supportive housing programs. These programs briefly speak to requirements for compliance with the 0.2 percent AEP floodplain and alignment with the CPRA Coastal Master Plan flood risk projections. I also recommend project criteria that requires contractors to build and rebuild homes with weatherization best practices. Appreciating the Amendment's emphasis on sustainable and energy-efficient construction materials and methods, I recommend inclusion of specific criteria embedded through the Action Plan's programs that further emphasize and assist contractors in implementing best practices.

In addition to providing a more energy-efficient dwelling, weatherization will reduce energy costs to low-income households, provide investments in local employment, and generate air quality benefits for the community. More specifically, The Department of Energy estimates households save an average of \$372 per year through weatherization improvements and upgrades.

In Louisiana's Climate Action Plan, Strategy 13 sets a high level vision to "improve the efficiency and resilience of homes and non-home residential buildings," followed by five subsequent policy-specific actions to turn vision into action. Action 13.1 recommends federal funding for pre- and post-disaster mitigation shall require weatherization best practices in the building and rebuilding processes. With these benefits in mind and alignment with the Climate Action Plan, we recommend specific and clear project criteria requirements for weatherization in these housing assistance programs.

Additionally, with many housing programs available to provide disaster and weatherization assistance, we recommend inclusion of another recommendation from Strategy 13, which calls for a centralized portal for homeowners or commercial building owners seeking to apply to any efficiency-related state programs. We recommend the portal provide one entry point for interested parties, where state staff will assist homeowners and business owners in finding the program for which they are most eligible; we also recommend free home assessments to determine the costs of weatherization. If implemented, this action provides solutions for two major obstacles in applying to housing programs: confusion of program requirements and inability to afford home assessments. Though this program would mainly benefit the few recommended re-building and re-housing programs, we see the benefits could be much broader across state programs. Infrastructure

We appreciate focus of the amendment on further assistance to the rehabilitation of infrastructure across impacted communities and local economies. Another major component of infrastructure that we see impacted in



recent disasters, in particular, is the electric grid. Substantial damage to the grid caused and exacerbated community and economic impacts, following disastrous wind, storm surge, and flooding damages. For this, we recommend infrastructure programs include the lens of and dedicate funding towards electric grid reliability, resilience, and modernization. Community-led efforts – such as community lighthouses with solar-plus-storage microgrids or dispatchable battery units – can provide electricity for communities following a disaster before the grid is restored; alongside duplicity, microgrids and other distributed energy resources (DERs) provide access to renewable power. These measures further objectives of the Climate Action Plan to reduce emissions from the electricity sector, adapt to a changing climate, and provide more widespread access to energy resources. Through the Building Resilient Communities Program (BRIC), FEMA is investing in microgrids and dispatchable battery units for this precise purpose. Thus, we urge OCD to consider dedication of funds towards similar energy resilience and decarbonization efforts that are being led by local groups.

I look forward to further discussion and collaboration about aligning climate mitigation and resilience efforts that are being implemented across state government, as we partner towards a more resilient and equitable future for Louisiana.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida, and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

PRIME

COMMENT: Thank you to the entire Louisiana Office of Community Development (“OCD”) team for working tirelessly to enact great public policy and programs that ensure our state emerges stronger after each natural disaster. With an intimate grasp of the severe affordable housing shortage in our state and the acute need for disaster-resilient housing, we are pleased that OCD is proposing more than \$400,000,000 to be allocated to a Piggyback Resilience Initiative

- Mixed Income (“PRIME”) program under the State of Louisiana Substantial Action Plan Amendment No.1 for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana (“Draft Action Plan”), published on June 16, 2022.

With our extensive track record of deploying CDBG-DR funds for catalytic developments, HRI Communities, LLC (“HRI”) has successfully utilized the PRIME program and its predecessor, the Piggyback program, to deliver much

needed housing in communities such as Hammond, Lafayette, Houma, Shreveport, and New Orleans. We look forward to HRIC’s continued partnership with OCD and the Louisiana Housing Corporation (“LHC”) in developing high- quality, resilient housing. It is our hope that the proposed PRIME funds are speedily deployed so that our parishes, cities, and neighborhoods can not only recover from Hurricanes Laura, Delta, and Ida and the 2021 Floods, but also attain disaster-hardy housing that residents can quickly return to after the next hurricane or flood. As an experienced development partner of OCD and LHC, we offer the following input on how current suggested PRIME program can be designed and implemented in the form of one Notice of Funding Availability (“NOFA”) processes to achieve both national and local housing objectives. To acknowledge and address obstacles looming over the housing industry and thus maximize the potential beneficial outcomes of the current proposed PRIME program, we suggest that the \$150,000-per-unit funding cap be removed. With growing construction costs, rising interest rates and climbing insurance premiums, catalytic rental developments that serve low- to moderate-income residents (who disproportionately struggle to find attainable, high-quality, and disaster-resilient housing) are becoming increasingly challenging to finance. Cautious debt underwriting with program-restricted rental revenue compound these challenges and create a very real threat to affordable housing production at this time of great need. Given these extreme economic volatilities, it is difficult to project realistic cost restrictions that will remain responsive to financing conditions over even the short-term. A per-unit limit on CDBG-DR funding available per project will inadvertently reduce the number of projects that are feasible – in a time when we need as many high-caliber projects as possible to serve our most disadvantaged and vulnerable populations, particularly in areas offering opportunities for a higher quality of life.

In addition to eliminating the \$150,000-per-unit funding cap, we propose the following criteria for competitively scoring projects, which will effectively support the community revitalization of areas that need funding assistance the most while ensuring that new rental developments are built to promptly serve low- to moderate-income households without compromising construction quality or disaster resiliency standards.:

- Prioritization for mixed-income projects that have a 9% LIHTC award from LHC and that further demonstrate shovel-readiness by having obtained or completed survey, design development plans and zoning approvals.
- Prioritization for developments that are already in advanced stages of the HUD Environmental Assessment process and are thus well-positioned for an expeditious clearance to apply CDBG-DR towards housing production.
- Prioritization for 4% LIHTC/tax-exempt bond projects that are immediately adjacent to previously awarded 9% LIHTC projects. In delivering additional scale to those developments, efficiencies are capitalized upon, and cost/benefit of community revitalization is compounded. Furthering this intent,



bonus points or other priority consideration should be attributed to 4% LIHTC projects that can be constructed simultaneously with an adjacent, awarded 9% LIHTC project.

- Prioritization for developments in historic districts, downtown districts, and economic development districts.
- Prioritization for projects that will provide residents access to public transportation routes, such as developments in close proximity to a bus stop.
- Prioritization for projects that will create public housing replacement units as a part of a Choice Neighborhood Initiative.
- Prioritization for projects that are receiving support from a local government entity, including local redevelopment authorities, which can take the form of waived impact fees; a Payment in Lieu of Taxes (“PILOT”); a long-term ground lease; public funding of infrastructure improvements; or direct local funding such as a government- provided soft loan (e.g. HOME, CDBG or another form of financing). Such local financing participation is to be evidenced with a letter from the participating government entity.
- Prioritization for projects partnering with cities or parishes through a Development Agreement whereby the developer will implement public improvements, including storm water infrastructure improvements, on behalf of the city or parish.
- Aside from the benefits already afforded to QCTs by the LIHTC program requirements, make no prioritization for projects located within them, as QCTs in a number of MID parishes are not correlated with priority areas for housing recovery developments.

Finally, we believe it would be excellent public policy for OCD to consider a separate PRIME funding round to encourage Resilient Senior Housing to be supported with project-based vouchers from local public housing authorities or governmental agencies. As disasters displace our communities and populations age, an ever-growing number of the state’s senior residents are in desperate need of affordable, high-quality, and disaster-resilient housing. This proposed PRIME Resilient Senior Housing round would present a unique opportunity to provide seniors with safety and confidence in their living environment. Indicative of the needs and attributes of affordable senior housing, we suggest that this particular PRIME round: (a) would not require mixed income tiering; (b) would provide scoring incentive to historic renovation developments that, when converted, often offer housing opportunities in long-underserved communities with high barriers to entry; and (c) would prioritize resiliency innovation in order to serve our seniors especially during disaster events and other times of increased vulnerability.

The PRIME program proposed in the Draft Action Plan holds much promise for tremendously enhancing the state’s rental housing stock to reduce the threat of major storms and severe rain events having negative, life-altering impacts on Louisianians. We appreciate your consideration of this feedback on the Draft Action Plan and



hope that these comments, which are rooted in good public policy and informed by our extensive experience in partnering with OCD and LHC to tackle the state’s always-daunting recovery needs, are incorporated into the final plan.

On behalf of the entire HRIC team, thank you. We appreciate your consideration and welcome any possibilities to discuss further. Sincerely, Josh Collen President HRI Communities, LLC

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please know OCD has taken rising costs into consideration along with best practices for scoring.

RENTAL HOUSING

COMMENT: Thank you for your efforts to put forth a comprehensive amendment to the Master Action Plan for Hurricanes Laura and Delta, which will now also cover the \$1.27B for Hurricane Ida and the May 2021 Floods. This additional funding is critical, but will still not meet the full need for our residents. Given that, we remain especially concerned about the prioritization and efficient use of the existing funds. We are generally supportive and grateful for a plan that prioritizes housing spending and does not give renters short shrift. However, we are disappointed in OCD’s dismissive response to our initial comments and continue to be concerned that the vast majority of this assistance will entirely miss the very low income communities that need it most desperately. We specifically provide the following comments:

We commend your office for dedicating nearly 70% of this allocation to housing programs as they are clearly the largest unmet need. We’re also grateful that the allocation ensures a proportional amount of housing relief is targeted at renters, who are often left with less support after disasters. We should note though, that the plan mistakenly suggests that \$380M will be used for programs targeting homeowners, while \$487 will be dedicated to rental housing (pg 100). In fact the Program Details: Housing Program section shows that \$380M will be used for the Restore Louisiana program alone, with another \$14M being allocated to Flood Insurance, Interim Housing Assistance, and the Soft Second Mortgage Program. That leaves the rental programs with only \$474M, not \$487M.

We continue to be grateful for the nuanced priorities and phasing contemplated for the Restore Louisiana Homeowner Program (RLHP).

These priorities will ensure that the families most impacted are not left behind as those with the most resources jump to the front of the line.

In contrast to the very nuanced and thoughtful income targeting in the RLHP, LaFHAC remains concerned about the lack of income targeting in many of the other housing programs, especially the rental programs. The OCD response that many of the programs are administered by LHC and must follow their guidelines is insufficient. Regardless of what income targets HUD or LHC may set, local programs are almost always allowed to target or prioritize deeper affordability and OCD should make that explicit in this plan. As we mentioned in our previous comments, data consistently shows that the need for affordable rental housing is specifically at 50% AMI and below.¹ The state should be particularly concerned about providing more units at 30% AMI and below, given how dramatically COVID, the recent hurricanes, and inflation have tightened the rental markets in South Louisiana. Without a plan that specifically requires more units at these low levels, OCD is setting the state up for a worsening homelessness crisis that will only require even more resources to address it than if we'd simply built more of the units we need now. The largest program—the Mixed Income Gap Funding Program (PRIME)—should especially target all affordable units at 50% AMI and below and a significant portion of these at 30% AMI and below. The same should be true for the Middle Market Loan Program and the Neighborhood Landlord Rental Program. The Soft Second Mortgage Program also does not include income targets for its recipients. Unlike affordable rental housing, income targets for homeownership programs should be set higher than 80% AMI to ensure a robust pool of applicants who can qualify for a loan. We recommend setting the target at 100% AMI.

LaFHAC also continues to be concerned about the short terms of affordability in most rental programs. In the two programs for multi-family housing, the affordability term is only 20 years, compared to a minimum of 30 years for Low Income Housing Tax Credits (LIHTC) awarded through the Louisiana Housing Corporation (LHC). LaFHAC has argued that even 30 years is too short, as many states are moving to 40 or more years of affordability for new LIHTC developments. To ensure these funds are used efficiently, it is imperative that the state set the terms of affordability for at least 30 years.

¹ *The Gap: A Shortage of Affordable Rental Homes*, National Low Income Housing Coalition, 2019, Available: <https://reports.nlihc.org/gap/2019/la>.

This is also relevant to ensure the Neighborhood Landlord Rental Program doesn't fall victim to the same problems as the Small Rental Repair Program after Hurricane Katrina. The program does not make clear any affordability terms for buildings with four units and below and allows for affordability terms as short as five years for buildings with more than four units. Allowing units to become market rate so shortly after a public investment is a waste of taxpayer funds. We recommend affordability terms with a minimum of 10 years that increase to 30 years for new construction. We also urge the state to share its plans for ongoing compliance monitoring, as New Orleans advocates regularly saw Small Rental Repair grantees flouting the terms of their agreements and renting substandard properties at market rate prices.

We again urge OCD to tie the acceptance of CDBG-DR infrastructure funds to the acceptance of affordable rental housing in order to deter Not In My Back Yard (NIMBY) opposition, and to use Notice of Funding Availability (NOFA) scoring to prioritize low poverty areas for these developments. Louisiana has a longstanding problem of not addressing equity on the front end of its disaster recovery programs and watching as they reentrench segregation and violate the Fair Housing Act’s mandate to Affirmatively Further Fair Housing. In one particularly noteworthy example, New Orleans became even more segregated after ten years of housing recovery programs than it was before Hurricane Katrina.² The state’s targeting metrics for the RLHP should help address this with regard to homeownership, however, there must be a complimentary commitment to ensuring new rental housing does not perpetuate segregation. This is especially concerning given the often racially coded NIMBY opposition we’ve seen to LIHTC and other affordable developments across the state in recent years. LaFHAC has tracked instances of local officials delaying, denying, or imposing moratoriums to thwart affordable housing developments in Hammond, Denham Springs, Gretna, New Orleans, and St. Bernard Parish, among others.³ It would be a tremendous waste of funds to

² Seicshnaydre, S., Collins, R., Hill, C., and Ciardullo, M. *Rigging the Real Estate Market: Segregation, Inequality, and Disaster Risk*. The Data Center. 2018. Available: www.datacenterresearch.org/reports_analysis/rigging-the-real-estate-market-segregation-inequality-and-disaster-risk/.

³ Raley Pellittieri, “Attorney warns city officials to stop interfering” Hammond Daily Star, September 1, 2020, available: www.hammondstar.com/news/attorney-warns-city-officials-to-stop-interfering/article_62e1962f-046d-559f-9056-6f17ecb62cf0.html; Paul Cobler, “Denham Springs Council blocks proposed location to rebuild flooded public housing” The Advocate, December 8, 2020, available: www.theadvocate.com/baton_rouge/article_dcf07b0c-399d-11eb-a2a4-3f9decd3ca4c.html; LaFHAC Calls on the City of Gretna to Immediately Lift its Ban on Multi-Family Housing Development, LaFHAC, November 23, 2020, available: <https://lafairhousing.org/nimby-neighbors-fight-senior-housing-in-central-city/>; GNOFHAC Issues Letter Exposing Unlawful Racial Animus in Opposition to Mixed-Income Development in the Bywater, LaFHAC, 2019, available: <https://lafairhousing.org/gnofhac-issues-letter-exposing-unlawful-racial-animus-in-opposition-to-mixed-income-development-in-t/>; St. Bernard Parish to Pay \$1.8 Million to Settle Decade Long Fair Housing Center Suit, LaFHAC, December 19, 2014, available: <https://lafairhousing.org/st-bernard-parish-to-pay-1-8-million-to-settle-decade-long-fair-housing-center-suit/>.

Award millions in affordable housing funding and then see developments delayed or killed by local governing authorities years later after the urgency of rebuilding has subsided.

- LaFHAC also recommends increasing the funding available to immediately address homelessness. Only 2% of the total housing funds in the plan are being used to support families most at risk of living on the



street. Of that total \$16M, \$6M is reserved for Permanent Supportive Housing (PSH) and while much needed, many renters will not qualify for it. The Rapid Rehousing funds could serve a broader group of renters, but the plan does not define who is actually eligible. The plan should significantly increase the funding for this program and clarify whether renters who are not homeless by HUD's definition, and not living in FEMA housing, but who are experiencing housing instability because of substandard housing conditions, being cost-burdened, or facing potential eviction will be served.

Furthermore, the maximum of \$1,000 in rental assistance per month does not even cover the 2022 FMR Fair Market Rate for a two- bedroom apartment in New Orleans, which is nearly \$1,100. The cap of \$1,000 per month disadvantages families with children who may need two, three, or even four-bedroom units. It will take years for many of the new affordable units financed through this package to actually be built and leased up. In the meantime, the number of families experiencing homelessness has increased dramatically. According to the service provider in the Lafayette area, there are 27 children enrolled in school that are currently living in tents and cars in just Lafayette Parish alone. This spike began during COVID, but has been exacerbated by the fact that the Acadiana region has been a receiving community for many families displaced by Hurricanes Laura, Delta, and Ida.

Finally, LaFHAC urges the state to ensure all new rental units incorporate mandatory renter protections including but not limited to:

- Mandatory acceptance of Section 8 Housing Choice Vouchers and other tenant-based subsidies;
- Good cause eviction protection;
- Prohibition on waiver of notice before eviction;
- Mandatory cure clauses in leases; and
- Mandatory review of Tenant Selection Plans to ensure compliance with LHC's new criminal background screening requirements.

Due to the lack of renter protections in state law, OCD should ensure that when its money is used to house tenants, those tenants are given basic protections to ensure long term housing stability for vulnerable families. Again, because these funds fall desperately short of the full need, we must ensure the units they produce are open to all and do not allow for unnecessary displacement.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. All housing rental programs proposed are targeted to serve low to moderate income households and meet HUD national objective of LMI (low-to-moderate income), with prioritization and set-asides being given to low- and very-low-income applicants. Additionally, the state along with local jurisdictions have available funding through the



Emergency Rental Assistance Program that continues serving thousands of renters throughout the entire State along with reducing homelessness. These programs are all currently active and have greater flexibility than CDBG funding. For more information, please visit www.lacovidhousing.org

INFO HOUSINGLA

HousingLOUISIANA is a statewide initiative aimed at meeting Louisiana's housing needs and creating a statewide network of regional housing alliances to ensure better collaboration across the state. The partnership works to preserve and provide affordable housing for people across the state, with a focus on the needs of the most vulnerable members of society, such as seniors, people with disabilities, veterans, low-wage workers, and low-income families. The network's objectives are quite similar to those of the Office of Community Development. As federal resources for affordable housing grow increasingly limited, we realize the significance of making the greatest use of those resources and leveraging funding to achieve better results.

As the Office of Community Development plans to release the 2022 Restore Louisiana Action Plan, we have the following recommendations/concerns:

RestoreLA Action Plan

1) Hurricane Ida Comment Period Extended

- a. For the 2022 RestoreLA Action Plan, the OCD's engagement process should be extended. There should be a training session on how to submit comments and attend
 - ii. LIHEAP funds provided by the Louisiana Housing Corporation
 - iii. Supplemental appropriations from Congress

2) Affordable Rental Homes Program

- a. **Neighborhood Landlord Rental Program**- The neighborhood landlord rental program is great for landlords, but Ida's damage will require more than \$20 million in repairs. This wouldn't give landlords at least 100 homes given the current state of inflation and construction costs. Landlords would be required to allocate a percentage of those revenues to local contractors and suppliers of building materials. Aside from that, it depends on whether the majority of those residences are multi-family structures and whether FEMA has evaluated those structures.

3) Affordable Homeownership Programs

- a. **Flood Insurance Programs** -The allocation for the flood insurance program is set for \$1 Million. These funds aren't enough to cover the south Louisiana region that was affected by Hurricane Ida. According to the HousingNOLA Storm in Orleans Parish, the total cost for full recovery would be \$86,657. However, the total cost for the state for destroyed homes to be recovered is \$5,221,800,000. If FEMA is funding the flood insurance program, it should be stated in the action plan.

HousingLOUISIANA has calculated the amount that the state will need to pay to cover minor, moderate, major, and damaged properties as a result of Hurricane Ida which listed below.

	Minor	Moderate	Major	Destroyed
Total Units Damaged by Category	263,797	161,703	95,224	17,406
Total Damage Costs by Category	\$263,797,000	\$1,536,178,500	\$1,904,480,000	\$5,221,800,000

We are pleased that the OCD has been active in this process to date, but moving forward, in order to help the plan be successful, there is an opportunity to leverage this partnership to make sure we are providing affordable housing and services needed for the residents of Louisiana. Thank you for your consideration. Please contact me at amorris@housinglouisiana.org or 504.224.8301 for any further information.

Sincerely,



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The flood insurance program is not designed to cover all Restore Louisiana Homeowner Assistance Program participants. This is limited to only those low-income households unable to be compliant with the program.

IDA APA 1 VIRTUAL PUBLIC HEARING COMMENTS

COMMENT: will we be able to see the recording later to check for what we missed? Can I get the recorded webnair emailed to me??

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The recording of the virtual meeting is posted on the website here: <https://restore.la.gov/public-hearings>.

COMMENT: Is the information provided on this zoom meeting the same as the in person meeting tomorrow 6/22?



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Yes, this presentation will be given in-person tomorrow in Jefferson Parish.**

COMMENT: Why isn't Cameron Parish in the list of parishes?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **This presentation is showcasing the new HUD-identified Most Impacted and Distressed (MID) parishes that became eligible with the new funding allocation for Hurricane Ida and the May 2021 Severe Storms, announced in March 2022. Cameron Parish is included as a MID parish in the original Hurricane Laura/Delta allocation, and is eligible for Restore Louisiana programs.**

COMMENT: What about Orleans Parish?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Orleans Parish is included.

COMMENT What does AMI mean?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **AMI is Area Median Income.**

COMMENT: Is this call only discussing the flood and Ida?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **This presentation does focus on the Hurricane Ida and May 2021 Severe Storms funding allocation, since this allocation includes new MID areas, but is also relevant to Hurricanes Laura and Delta recovery since the allocated \$450M in additional funding is included in this Action Plan Amendment.**

COMMENT: Has HUD approved Action Plan for Laura/Delta?



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **HUD has not approved the Laura/Delta action plan yet. The Hurricane Ida allocation (information covered in this presentation) is actually a substantial amendment to the original action plan which addresses Laura/Delta allocations. There will be another hearing held in Lake Charles one week from today, the information is as follows: Tuesday, June 28th @ 6:00 pm, Allen P August Multi-Purpose Center, 2000 Moeling St., Lake Charles, LA 70601"**

COMMENT: Can we get a copy of the slides or is this on the website?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Yes – the slides will be sent to meeting participants and additional information can be found on the website at <https://restore.la.gov/public-hearings>.**

COMMENT: I have seen in several communities that there are so many large multi-family apartments being built in certain areas that are subsidized through LA Housing Corp and HOME funds or DR funds, that, as a result, the older lower income neighborhoods are emptying out with families moving to the newly built units. This is often good, but also the older single family neighborhoods with single family housing and unsubsidized rental units are getting a lot of vacant housing as people move out and as small landlords cannot compete with the new subsidized units. So this is something to consider in the analysis of funding the new units and how it impacts the older lower income neighborhoods.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **We may follow up on this idea with you.**

COMMENT: Explain the structural damage of 25K or less. I had 3ft 7 in of water in my home. Had to replace everything below 4ft"

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms.. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The \$25,000 or more in insurance proceeds questions helps us phase applicants so that we may help the most vulnerable first as per HUD requirements. After these needs are met and as funding allows the



program will open to additional phases. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: How do I get help understanding as a disabled person who was a renter whom is still living in a hotel to know what help I can get? I have an open case. Currently renters insurance is paying for us to live in a hotel. This is only until 10/31/22 and it's a month by month approval. We are trying to find a contractor to build a handicap home within our budget but the contractor came back with a 280k home which we cannot afford. Just need help knowing what help we can get if any.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **You may be eligible for the Soft Seconds program, which will be administered by the Louisiana Housing Corporation. That program is anticipated to launch fall 2022..**

COMMENT: How do local jurisdictions get a list of the FEMA inspected homes? FEMA is very reluctant to share their information with us per their privacy guidelines.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Local jurisdictions would need to coordinate with GOHSEP to obtain FEMA IA related data.**

COMMENT: I may have missed it, but was there a discussion about the amount that may be distributed to those who qualify?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: By homeowner, do you also mean "propertyowner" if it is a rental property?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. **The Restore Louisiana Homeowner Assistance Program is specifically for homeowners, however we may also serve homeowners that own a duplex if the homeowner owned and occupied one side of the structure at the time of the disaster event. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.**

COMMENT: If there is a buyout of property in a floodway, does the propertyowner or home owner have to be LMI eligible?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and review the program guidelines for the Solution 4 buyout component for homeowners on our website, providing more information about the eligibility criteria - one of which is whether the property is located in a floodway. LMI is not a requirement for eligibility, but instead is used to prioritize phasing for program assistance. .**

COMMENT: Do you know whom I would need to contact?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms . The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **The parish contacts listed on GOHSEP's website are here: <https://gohsep.la.gov/ABOUT/PARISHPA>.**

COMMENT: I did the survey, It said I was not eligible, but according to the criteria I am. Do I need to resubmit the survey? And my damaged mobile home is on rented property and the property owner wants it removed. If I tear it down before someone is able to come out and survey my property loss, will I be eligible to receive funds?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Expenditures for repairs may be reimbursed for certain qualifying applicants or property types. The survey does not provide information regarding eligibility, please contact the call center at 866.735.2001 for further assistance. Additionally, please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home. Be sure to take a picture



of your damaged mobile home, its serial number along with documentation of having it removed from the leased property.

COMMENT: do small business applicants have to complete the homeowner survey to be eligible? or is that just for the homeowner assistance?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **The Small Business Loan Program will be administered separately from the Louisiana Homeowner Assistance Program so you will not need to complete the homeowner survey. As soon as the Small Business Loan Program launches (after HUD approves the action plan), the information on how to apply will be available on the Restore Louisiana website.** The Restore Louisiana Homeowner Assistance Program is only available to residents who owned and occupied the damaged residence at the time of the disaster.

COMMENT: There are several instances in this presentation where you mentioned Laura/Delta or Ida on this call and frequently mention only Ida in the Substantial Amendment, are all the programs in the Substantial Amendment (\$1.27B) for Ida and May 2021 floods or are there programs that are not for those impacted by the May 2021 floods? How does the State intend to serve Calcasieu Parish outside of Lake Charles?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **HUD is currently considering an action plan for \$600 million to spend on Laura/Delta recovery programs. We will launch those programs as soon as HUD approves the action plan. The action plan amendment we are discussing today not only covers the new allocation announcement of \$1.2 billion for Hurricane Ida and the May 2021 Severe Storms, but also the additional \$450 million allocation announced for Hurricanes Laura and Delta.**

COMMENT: any time frame for when funds will be released

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Funds will be released by HUD upon approval of the action plan, and then the action plan amendment, as well as the execution of the requisite grant agreement to be supplied by HUD. It is unknown what the exact timeframe for approval is as it is determined by HUD's process.

COMMENT: EDGARD WAS HIGHLY IMPACTED BY IDA. IS THERE ANY PLANS TO BUILD HOUSING IN THAT AREA FOR THE MASS THAT IS HOMELESS. THERE IS A LOT OF LAND THERE. I RECOMMEND ANNEXATIONS ON SOME OF



THAT LAND TO BUILD AFFORDABLE HOUSING IN EDGARD (EMPHASIZE EDGARD WEST BANK ST JOHN THE BAPTIST PARISH.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Thank you for the input. We will keep that in mind when designing the affordable rental housing programs.**

COMMENT: when do expect HUD approval for the first Laura/Delta Action Plan that was submitted in May?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Hopefully, during July.**

COMMENT: You mentioned FEMA; when FEMA came out to my unrepairable house,, they didn't go inside to see the damage, but told us that they could not help us. So I have nothing from FEMA

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you would like to appeal a previous FEMA determination on your damage level, please do not hesitate to contact FEMA by calling 1-800-621-3362 or visiting fema.gov/assistance/individual/after-applying/appeals. Be sure to include supporting documentation such as: contractor estimates or substantial damage/condemnation determinations from the local municipality, as well as any receipts to substantiate repairs made. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: If you are low income phase one and need elevation and repairs. Will this help be grants or loans?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program funds are a grant. If the damaged home has to be reconstructed and elevated, there is an allowance available as shown in our program policy manual, available on the program website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. For Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. Further, the Restore Louisiana Homeowner Assistance Program



does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any elevation only programs for which you might be eligible.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Just recently, my insurance company went into liquidation and as a result, will not pay insurance claims. I reached out to FEMA after Ida, and was told that as a HO with HOI that I would have to wait on the insurance company payout. There has not been any repairs to the home because of the wait with the insurance company and I've temporarily relocated. Which phase would this scenario fall under?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The unpaid portion of your homeowner’s insurance proceeds can be treated as an unmet need to help defray the Duplication of Benefits incurred with funds received by SBA, if any, or funds paid by the insurance carrier prior to their bankruptcy.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: My problem is I’ve been told my home which I own has shifted on the slab some and still awaiting the determination paper from inspection, will this hinder me getting help. I was told that one side of my home is off and needs lifting. Also all of the natural gas lines in my home had to be replaced because I had several major leaks. I used my entire savings on this. My home is still not completed, only my roof. Should I wait on the determination before moving forward with repairs?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



COMMENT: What happens if the homeowners has an existing SBA loan from a previous hurricane disaster Katrina , currently paying on the mortgage at the age of 79 years old with disabilities and a low income who has currently incurred property damages again from Hurricane Ida. Is there any type of loan forgiveness programs??

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We cannot speak for SBA, but there is no ability to pay off the previous SBA disaster loan with Restore Louisiana funds. If you are eligible for the program, though, we can provide home repair.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT what is considered a floodway area

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **You can contact your parish building department or floodplain manager, you may also check here <http://maps.lsuagcenter.com/floodmaps/>.**

COMMENT: If a homeowner decides to use a contractor under Solution #1 and that contractor flakes, performs poorly what is the channel for a homeowner to contact the state to get this rectified? Does the state vet each contractor thoroughly before placing them on the approved/qualified list?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Solution 1 (program managed) contractors are assigned by the state and work completed must meet your local jurisdictions' code requirements. Solution 1 projects are inspected by third-party quality assurance inspectors. Work that does not meet code must meet code before a jurisdiction can close the applicable permit. All permits must be closed by the jurisdiction and items identified on the program's scope of work must be verified as completed to program standards prior to final payment to the Solution 1 contractor. There is also a grievance process outlined in our program policy manual as well as a form available on the Restore Louisiana website where concerns may be submitted. The program's contractors provide a one-year warranty on workmanship too.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Fema takes forever to review. Fema did not do onsite assessments because of covid. The damages are extensive. Will homeowners be able to complete the Hud application while Fema reassess. I've been in appeals Since Laura and Delta. thxs

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Yes, you are still able to complete the survey for the Restore Louisiana Homeowner Assistance Program while waiting for your updated FEMA assessment.**

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: I have taken the survey and have an account number. How long will I have wait for the process to start

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The survey questions help us phase applicants so that we may help the most vulnerable first as per HUD requirements. The program is currently processing Phase 1 applications. Please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: The estimates to level, remediation and repair was more than I could get from insurance. My house was old, built in 1949 and built on pillars which the hurricane cause the house to shift causing major damage. Parish did not assess this. My house has been demolished and I am seeking help in the ability to reconstruct another home. I had 1 contractor & he refused to build a smaller 224omes. I'm trying to get a modular home, but don't have the funds for the cost. I was 78 at the time of Hurricane Ida.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: an inspector from restore has completed the assessment to my home. I have NOT been approved nor denied for the grant as of today. My file is still under review, per my Case Manager. My HVAC crew has an appointment to remove ducts and install all new systems on Friday. I'm unsure if I'm able to move forward with this or do I need to wait? It's \$14,000 so I need to be certain. I hope this makes sense. I'm scared to make changes to my property being the inspector has already been to my home.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: we live in LaPlace and our home flooded and had wind damage ..we got homeowners and flood ins. Money and a 25,000 SBA Loan..Fema denied all help because of ins..we are both seniors is this program for us?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Any funds received from the insurance carrier for repair for the damaged structure will be counted as a Duplication of Benefits. SBA funds paid out for repair of the damaged home will also be counted as a duplication of benefits. However, SBA funds may be repaid once the project is completed if eligible. If the cost of your repairs exceeds the amount received by insurance or SBA, you may be eligible. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so.

COMMENT: Calcasieu parish has housing rehab program for the elderly. May I still apply for the grant?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Any funds received for the same activity of repair or reconstruction of your home will be counted as a Duplication of Benefits.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: The Substantial Amendment states that the State is requesting a "WAIVER OF 70 PERCENT OVERALL BENEFIT FOR LOW- AND MODERATE-INCOME (LMI) PERSONS/FAMILIES" but the language under the header is a repeat of the first paragraph under the waiver request to extend the tenant based rental assistance limitation. Could you clarify what the State is actually requesting under Appendix B #4?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state is requesting a waiver to allow spending of less than 70 percent of overall benefit for low- and moderate-income persons/families.

COMMENT: one more question related to Solution #1.....will the contractor have to provide an overall estimate of the cost of repairs? Also, will the state pay the contractor directly?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state will conduct a damage assessment as part of the application process in order to calculate your award. Solution 1 (program managed) contractors are assigned by the state, and the assigned contractor will also complete an inspection of the project after grant execution. All program work completed must meet your local jurisdictions' code requirements. All permits must be closed by the jurisdiction and items identified on the program's scope of work must be verified as completed to program standards prior to final payment being made to the Solution 1 contractor. The program's contractors provide a one-year warranty on workmanship too.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Is there anywhere to access the Area Median Income?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. HUD's posted income limits are here: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/>



COMMENT: Is a loan from SBA - considered to be a duplicate of benefits.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you are eligible for the Restore Homeowner grant, SBA funds can be used in conjunction with program funds. SBA proceeds drawn for the repair of the house may be counted as a duplication of benefits until the project is completed, at which time the SBA loan may be paid off dependent on specific criteria. We strongly encourage you to fill out a survey at <https://restore.la.gov/> if you have not already done so and review the Program guidelines and resource documents on our website at <https://restore.la.gov/> that detail how the Program may be able to help you repair your home.

COMMENT: if it said I was not eligible, How will i get an application for the program?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the survey indicated you were not eligible, but you feel you meet the program criteria, please contact the call center at 866.735.2001 to review the survey questions and answers.

COMMENT: I might have not been clear in my previous question. The programs in this Amendment for the allocation for 2021 disasters of \$1.272B for Ida and May Flood, in some instances only reference Ida instead of both Ida and the May Flood as a qualifying disaster under the eligibility criteria. My question is was it the State's intent to exclude Calcasieu Parish (affected by May flood but not Ida) in the eligibility criteria, or are the programs for the 2021 disasters for both Ida and the May flood? There are likely homeowners in Calcasieu Parish outside of Lake Charles (since Lake Charles received their own allocation) who need assistance.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The programs set forth by the state under the Hurricane Ida and May 2021 Severe Storms allocation include programs for homeowners affected by either disaster as those areas are designated by HUD as most impacted and distressed (MID) under the Hurricane Ida and May 2021 Severe Storms federal register notice. Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes

COMMENT: I appealed Fema's decision and I then received assistance due to the major damages my mobile home received, but i did the survey before the final decision? should I resubmit the survey?



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please reach out to the call center at 866.735.2001 to update the information on your current survey. It is not necessary to complete an additional survey.

COMMENT: I know you said you cannot do the survey twice, but if it says I was not eligible and I am, How will I get an application if I don't resubmit the survey?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the survey indicated you were not eligible, but you feel you meet the program criteria, please contact the call center at 866.735.2001 to review the survey questions and answers.

COMMENT: Were any suggestions from the previous round of comments incorporated into the new draft?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. All comments received for the original action plan for Hurricanes Laura and Delta were reviewed and responded to prior to drafting of this action plan amendment. Responses can be found on the Restore Louisiana website.

COMMENT: think the variety of programs that you are suggesting for use of DR funds are a good mix and well needed in those targeted areas.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

IDA APA 1 OCD WEBSITE PUBLIC COMMENTS JUNE 29-30

COMMUNITY LIGHTHOUSES

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). Supporting the Community Lighthouse project just makes sense! The utility companies have been improperly regulated for so long and have not maintained their grids or poles. Evidence of this is seen throughout the state. Far too many people died due to the failure of the utility companies. There has to be safe places for residents to go for air conditioning and electricity. Community Lighthouses make sense and will save lives. Please



be sure to allocate funding for the Community Lighthouse Projects by Together New Orleans. Kanitra Caston-Hill, MS, CNP Climate Coordinator Alliance for Affordable Energy

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons: Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience. Grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience.
- Grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.



I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am writing to ask for your support in funding for the Community Lighthouse Project. It is so important to have a safe place to go after hurricanes or other extreme weather events for vulnerable citizens to find air conditioning, water, recharge stations and other help. I personally suffered severe heat in my uptown New Orleans home after Hurricane Ida. My older sister lives in a senior facility and she also experienced hardship. Fortunately, no one in her facility died. With higher water temperatures in the gulf waters, hurricanes will likely be more frequent this year and in the years to come. Providing community lighthouse hubs within walking distance to most citizens will save lives and give peace of mind. As you know, some people are unable to evacuate prior to a hurricane and, like Hurricane Ida, sometimes the storm comes too quickly to allow evacuation prior to the hurricane.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: This public comment is directed toward Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I am urging the State of Louisiana to include funding for community lighthouse projects for the following two reasons. One, it is my understanding that the majority of the deaths following Hurricane Ida, including all of the deaths in Orleans Parish, were due to electricity outages and insufficient resilience. Two, although grid hardening is important and crucial, we will still have outages. Therefore, we need resilience hubs in every community in the State each equipped with solar and battery storage so that they can operate independently of the electric grid. I strongly support the community lighthouse project as a strategic investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered



generators. Resilience hubs, like the community lighthouse, are safer, and more reliable and accessible to everyone in the adjacent and surrounding neighborhoods and communities.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am writing to urge state funding for Together New Orleans’s Community Lighthouse project. The project envisions 85 microgrids in Orleans Parish, and more beyond; the pilot phase will include 16 microgrids in New Orleans and 8 more across the state. The pilot alone, when completed by June 2023, will be the largest microgrid installation in the world. These microgrids – resilience hubs with solar panels and battery storage, that can operate independently of the power grid – will mitigate storm impacts in communities that lose power. Even with a “hardened” grid, local outages will still occur, endangering lives. We will be better prepared for them with this project. Resilience hubs like the Community Lighthouse are safer and more reliable than gas-powered generators and the hazards associated with them, and will be accessible to everyone in the community. The vision for Orleans Parish is that no one will live more than a 15-minute walk from a Community Lighthouse. About \$10M of the projected \$13M cost of the completed project has been raised; the state’s contribution could help raise the remainder of the needed funds. Most of the deaths following Hurricane Ida were due to electricity outages and insufficient resilience. I strongly support this project as an investment to mitigate the impact of future extreme weather events.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I’m sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:



- Most of the deaths following Hurricane Ida-- including all the deaths in Orleans parish-- occurred because of electricity outages and insufficient resilience
- grid hardening is important, but we all still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community." Many among us cannot afford an electric home generator.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am a Louisiana resident, voter, and senior citizen. I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) to strongly urge the state to include funding for the Community Lighthouse Project for the following reasons:

- When a disaster causes the power to go out for days or weeks at a time, I am forced to leave my home and evacuate because I can't breathe and quickly develop heat exhaustion in the summer heat without air conditioning. And, I am not alone. How many thousands, if not hundreds of thousands of folks in Louisiana are in the same boat after a hurricane or bad storm knocks our power out. And, I am lucky enough to be able to afford to evacuate. Think of the many folks of all ages who cannot afford to evacuate and suffer due to long power outages.
- Most of the deaths following Hurricane Ida—including all of the deaths in Orleans parish—occurred as a result of electricity outages and insufficient resilience. We need to mitigate this kind of hazard, and we can do it with Community Lighthouses.
- Grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.
- My congregation is a Together New Orleans partner, and we have agreed to provide the space and volunteers to serve as a resilience hub but we can't do it without financial support from the state and many other entities who are in a position to help.



I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators, saving lives and getting us back on our feet more quickly. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. Please allocate as much as you can to this incredibly forward-thinking, impressive, and self-sustaining project for New Orleans and surrounding parishes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I would like to submit this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am a lifetime resident of Louisiana, having lived in Orleans and Jefferson Parishes. Over the years I have needed to ensure the health and safety of my elderly parents and in-laws, as well as my disabled brother, during times of tropical storms, hurricanes, and power outages. It has not been easy. We have been fortunate, but others have not. When the storms pass, residents breathe a sigh of relief, but now we know that the storm

passing is only part of surviving. Prolonged power outages have caused many deaths, as we saw in Orleans Parish after Hurricane Ida. All of the deaths following Hurricane Ida were due to electricity outages, either due to heat-related deaths or carbon monoxide poisoning. We need resilience hubs with solar and battery storage in every community of our state so that they can operate independent of the electric grid and provide life-saving services to our communities. I ask the state, when developing and finalizing the action plan for the Ida disaster, to include funding for the community lighthouse project, an innovative, practical, and equitable approach to dealing with power outages that we know we will occur in the future. It is an investment in the safety and well-being of our residents during extreme weather events when we are at our most vulnerable.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am in support of including funding for the Community Lighthouse project as part of the Allocation of Funds for Hurricane Ida for the following reasons:

- The majority of deaths in the wake of Hurricane Ida were due to or closely related to the loss of electricity. This project will substantially alleviate those issues by providing electricity and shelter in times of crisis to those in need.
- This project is also in line with our long term goals of reducing our dependence on nonrenewable energy sources.
- This is an excellent community building project bringing together a wide variety of people of different faiths and backgrounds.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: The Community Lighthouse Project initiated by TOGETHER NEW ORLEANS is being recognized around the nation, indeed the world, as one of the most innovative responses to natural disasters in recent years. In

addition it is a green project with its use of solar power. Its focus on local communities and neighborhoods coming together to provide a resilient response to the immediate needs for power after hurricanes needs to be supported not only by individual congregations and citizens but by both industry and government.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. A decentralized, 100% redundant power grid should be our ultimate goal- ensuring that communities in Louisiana can restore power nearly immediately after a storm.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm a proud Louisiana resident with hundreds of years of history in the Bayou state. I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). It's time to make sure that we have secure funding to fund the community lighthouse projects in New Orleans and in Louisiana. We



have an incredible opportunity to develop a resilient city and state and become a national and international model. I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida—including all of the deaths in Orleans parish—occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. Please support the leaders of the Community lighthouse program and ensure that this program receives the funding it deserves.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community."

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities



Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I must urge the state to include funding for the community lighthouse project for the following reasons: Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid. I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

CASE MANAGEMENT

COMMENT: Hello, I wasn't at the meeting that took place, however I wanted to write and maybe get some explanation into why FEMA was selling off some 250+ Trailers and RV's last month, when there are still needy people being put out of said trailer (and as many as 60 I have seen in Calcasieu Parish) only to have them sold online for ½ the cost to FEMA... I have been displaced for 2 years now because my trailer was damaged and then destroyed but the flood waters and winter freeze... I am a disabled Veteran about to be evicted from an apartment I can't afford by which I had to take in order for the VA to keep me living off the streets. I now find out that VA doesn't provide "Permant Housing for Veterans... I find this unexceptable not just because I am one of the 3,2018 homeless Vets but because the State and FEMA find it better to "have the satistics rather than get US off the streets... You never know what its like to live out of your car until your put into that situation... So I am Asking for a hand up ... not a hand out... AND PLEASE if you stick me in another "program" I'm going to scream.... I NEED HELP ... I can't believe that some people get into FEMA trailers and can buy them but I can't even get to talk to anyone... Well I know this won't get read and if it does it's going in the "Delete" box for sure... Truman R Miller btw I did do the survey and yes I got a response to "wait"... Thanks



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For FEMA-related questions, please call FEMA at 800.621.3362, and they may be able to explain their processes for temporary housing. If you need immediate rental assistance, you can contact the Louisiana Housing Corporation at 888.454.2001, who may be able to provide assistance. The state is working through necessary steps to be able to access federal grant funding and administer programs as soon as possible, such as the Restore Louisiana Homeowner Assistance Program. We strongly encourage you to fill out a survey for the Restore Homeowner Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

GENERAL

COMMENT: Please hold another public meeting in East Jefferson Parish, Louisiana.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Multiple public meetings have been held throughout most impacted disaster areas with the goal of providing central locations for accessibility during the period for public comment. This is a thirty day period and, therefore, multiple meetings at each location are generally not feasible. The program will continue to lead outreach in these areas, and we encourage you to sign up for program updates on the website to be informed of any upcoming events or meetings in you're area.

COMMENT: I am excited this program will allow residents that received damages from Hurricane Ida to repair or rebuild their homes, however I have a few concerns with the programs that were presented:

1. Buyout options. Offering buyouts to residents within Parishes or incorporated municipalities without consulting with the local government before hand can lead to a loss of tax base and the potential for checkerboarding throughout the community. Several year's ago FEMA had public comment for a project similar to this where they would provide acquisition funds directly to the property owner and abandoned the idea because without the local government buy in it will be difficult for funding agency to manage the potential number of vacant lots. If this RESTORE buyout program would follow the guidelines that the property could be put back into commerce then there may be an option for this in the program.



2. V-Zone restrictions. Areas of Louisiana that were significantly damaged like Grand Isle have very limited options in this program due to the V-Zone restrictions. Grand Isle is 95% all VE Zone on the 2018 Effective Flood Insurance Rate Map and as such requires all new structure to meet flood elevation requirements as well as stringent wind code requirements. During Ida, the structures that were newly built with the required codes suffered minor to no damage. For the residents of the island that mainly work in the fishing and tourism industries they are currently living in temporary housing with no help in site based on their flood zone, which seems to be a discrimination. The closest low risk flood zone to this community is over 45 minute drive away and these individuals could not afford the fuel to commute. Under FEMA programs, elevation of existing structures is allowed in a V-Zone so I would ask that Restore look at allowable activities in a V-zone and see if HUD will allow for a structure to be elevated and repaired or rebuilt using restore funds.
3. Infrastructure needs. Most of the funding for infrastructure type projects has been allocated to HMGP match which requires a Benefit Cost Analysis which deems a project ineligible. Having the flexibility of D-CDBG funds to assist with infrastructure projects that do not require a stringent BCA would be beneficial to our communities. **Michelle M. Gonzales, CFM** | Director **Ecosystem and Coastal Management**
Jefferson Parish Government

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

1. As noted in the Restore Louisiana Homeowner Program guidelines for Solution 4 buyouts, this solution is only available as a voluntary acquisition to eligible applicants located within federally determined floodways or other high-risk property, as determined by the state on a case-by-case basis. Properties must be located within the most impacted disaster-declared parishes eligible for FEMA IA following the Hurricanes of 2020 – 2021. The Solution 4 Buyout program improves the resilience of impacted communities by transforming high-risk parcels of land into wetlands, open space or storm water management systems, creating a natural buffer to safeguard against future storms.
2. With regard to rebuilding in a V-Zone or Coastal High Hazard Area, the use of CDBG-DR funds is subject to 24 CFR 55.1, Section 55.1©(3)(i), which explicitly allows the use of HUD funds where the use of the funds is for work on an existing structure or “reconstruction following destruction caused by a disaster.”
3. The proposed Resilient Communities Infrastructure Program does not require a stringent BCA. The program policies will be available on the Restore Louisiana website once the programs are launched.



COMMENT: FEMA denied my application because I have insurance. My flood insurance has not paid me at all and I am currently in the appeal process with the NFIP. I was advised by letter the appeals process can take months and NFIP does not give any type of updates. To my knowledge, I haven't received any rating from FEMA so would I not be considered for the program? If so, I do not think that is fair for the insurance companies and FEMA to be allowed to be gatekeepers from people who really need help being able to get it. That is what is currently happening to me with the elevation programs being administered by St. John Parish and it's not right. Sincerely, Julita Hoyt LaPlace, LA

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For FEMA-related questions, please call FEMA at 800.621.3362. If the home has to be reconstructed and elevated, there is an allowance available as shown in our program policy manual, available on the program website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. For Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. Further, the Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any elevation only programs for which you might be eligible.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home

.HOMEOWNER

COMMENT: Our house was most seriously damaged by Hurricane Laura and then further damaged by Hurricane Delta six weeks later in August, 2020. The structural engineer declared the house unsafe and uninhabitable due to moisture and mold related issues in addition to severe structural damage to the entire house. The engineer recommended that it would be better and cost effective to demolish the house and then construct another house on the site. We (John and Sue Choi) are self-contracting to build our new house, but the costs of materials and labor have greatly increased subsequent to the hurricanes and covid related issues affecting manufacturing and availability of building materials. We have come to a near standstill in our reconstruction efforts due to a lack of funds. We appealed to the Disaster Recovery Fund to aid us in our efforts to rebuild a house. I thank you in advance for your time and consideration. Thank you! Sincerely, John and Sue Choi Lake Charles, LA



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program may be able to assist in rebuilding homes for qualified applicants. we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

HOUSING

COMMENT: Congratulations for a comprehensive overview your office has provided in this draft. The tables, maps and historical data are excellent as well as the current and predictive situation of the state that is included. May I make the following suggestions: Suggested Edits for Louisiana’s Draft CDBG-DR Action Plan for Hurricane Ida– the following comments refer to the housing programs described from page 115 to page 128 Interim Housing Assistance Program Eligibility: Individuals residing in FEMA Temporary Housing Units will be asked to start paying rent prior to the implementation of the program – as a result the eligibility of the program should be expanded to include eligible homeowners who left a FEMA temporary housing unit without a housing plan; or are currently unhoused. While we acknowledge that there are other programs within the Action Plan to assist in rapid rehousing, because this program specifically serves RLHP enrollees at or below 80% AMI it should recognize that some enrollees may currently not be incurring rental costs because they are unable to afford rent. Neighborhood Landlord Rental Program Affordability: Although projects with five or more units will be covered by the HOME program standards, program policies governing projects at or below four units should include similarly strong affordability requirements to ensure that low-income households can access. Program Method of Distribution: In addition to the method of description described under this section, awards should also be scored based on the ability of previous tenants to return to reside in units rehabilitated under this program where applicable. Residents of affordable units are typically displaced far from where they previously resided following a disaster – by placing a value on the ability of these residents to return, OCD can better assist these households in fully recovering. Funding: Given the direct and pressing needs of renters across the FEMA IA approved parishes for access to affordable housing, OCD should consider an increase in the proposed budget for the program – and do so not at the expense of other rehousing or tenant assistance programs within this section. Permanent Supportive Housing Program Funding: This program as described in the action plan demonstrates the state’s commitment to decreasing involuntary institutionalization and increasing independence and freedom for individuals living with disabilities. While this program as it stands is laudable, OCD should consider an increase in the proposed budget for the program – and do so not at the expense of other rehousing or tenant assistance programs within this section. Rapid Rehousing Program Program Method of Distribution: We strongly request that initial rental assistance be initially offered for longer than three months given that finding landlords willing to rent for only three months is likely extremely difficult – leading to low utilization rates among program enrollees. In addition, any waiver process for extension of rental assistance should be conducted in a way that prioritizing the prevention of a return to homelessness and minimizes the administrative complexity of the process. Funding: Given the direct and pressing needs of renters across the FEMA IA approved parishes for access to affordable housing, OCD should consider an increase in the proposed budget for the program – and do



so not at the expense of other rehousing or tenant assistance programs within this section. I will greatly appreciate your team taking these suggestions and incorporating them into the final plan. Julie Maldonado and Kristina Peterson Disaster Justice Network Coordinators Supporting Lowland People and Places through Education, Advocacy and Applied Research www.lowlandercenter.org www.Disasterjusticenetwork.org www.coastalresettlement.org 304-266-2517

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Currently there are other state and local programs that are assisting renters through the Emergency Rental Assistance Program. Please visit lacovidhousing.org for additional information.

COMMENT: Thank you for hosting the online public meeting to inform impacted communities on the Restore Louisiana (Substantial Action Plan) the Office of Community Development will submit to HUD under the (Disaster Relief Supplemental Appropriations Act, 2022 (Public Law117-43). The plan to rebuild impacted communities in Louisiana is important to ensuring that low income communities and businesses impacted by storms are able to recover quickly. Resiliency of communities is achieved when community members (homeowners, renters, and small businesses) get to participate in the rebuilding process. As the state works to create inclusive and sustainable communities, we ask that the following be considered. Those programs focused on affordable housing which is much needed in all of our communities, should be utilized in a way that have the greatest impact on residents and small businesses. With increasing costs adequate resources are needed that will greatly assist our most vulnerable populations and businesses. Equitable development solutions can be achieved with these federal funds. The Biden Administration has focused on creating equitable procurement opportunities across the federal government, and this is an opportunity for the state of Louisiana to help further that mission through intentional funding of minority developers in the affordable housing programs (Neighborhood Landlord Rental Program, Middle Market Loan Program, Resilient Mixed Income Gap Funding and Prime Piggyback Program). Will these affordable housing financing programs also be implementing HUD's equity goals of small business participation in these programs? Will the program take into consideration the challenges that minority developers face in accessing capital as noted in the NYTimes article in link below:

<https://www.nytimes.com/2021/03/17/business/to-help-black-developers-programs-start-with-access-to-capital.html>

Below is the policy of HUD according to its website: https://www.hud.gov/program_offices/sdb/policy/eo13170

INCREASING OPPORTUNITIES AND ACCESS FOR DISADVANTAGED BUSINESSES



It is the policy of the Department of Housing and Urban Development (HUD) to ensure non-discrimination in Federal procurement opportunities for businesses in the Small Disadvantaged Business Program (SDBs), businesses in the Section 8(a) Business Development Program and the Small Business Administration (8(a)s), and Minority Business Enterprises (MBEs) as defined in Section 6 of Executive Order 11625, of October 13, 1971, and to take affirmative action to ensure inclusion of these businesses in HUD contracting. The Department recognizes that these businesses are of vital importance to job growth and the economic strength of the United States and have faced historic exclusion and underutilization in Federal procurement. A successful and strong small business community is an integral component of the Department's overall mission of job creation, community empowerment and economic revitalization. Businesses certified under the LAUCP certification program should also be a criteria of consideration since that certification is approved by DOT as certifying agencies. Thank you for your time and consideration.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program will encourage small business participation in the programs established by the local governments giving specific requirements to consider underserved and disadvantaged communities. The program policies will be available on the Restore Louisiana website once the programs are launched.

EQUITY

COMMENT: The plan to rebuild impacted communities in Louisiana is important to ensuring that low income communities and businesses impacted by storms are able to recover quickly. Resiliency of communities is achieved when community members (homeowners, renters, and small businesses) get to participate in the rebuilding process. As the state works to create inclusive and sustainable communities, we ask that the following be considered. Those programs focused on affordable housing which is much needed in all of our communities, should be utilized in a way that have the greatest impact on residents and small businesses. With increasing costs adequate resources are needed that will greatly assist our most vulnerable populations and businesses. Will the disaster funding be distributed equitable across impacted parish? North Louisiana and rural parish don't always get a fair share of funding consideration yet, we are most inland. We should be building up affordable stock so that Louisiana residents don't have to relocate to Texas, Alabama, and Mississippi for evacuations. Many have noticed there were no in-person meetings in any of the northern parts of the state that were affected for the amended action plan. Also, what Equitable development solutions will be achieved with these federal funds related to types of developers? For instance will their be categories similarly for Small CHDOs, Nonprofit Housing Organizations, minority developers? We can not compete in the same manner as large multi generational development companies. It would be great to see some type of set aside for similar to what LHC has done with the NOAH and



what they did with their most recent QAP. Instead of having everyone compete. Building capacity and creating minority opportunities has been a major plank of the Biden-Harris administration. How will it trickle down to the state plan and execution?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program will encourage small business participation in the programs established by the local governments giving specific requirements to consider underserved and disadvantaged communities. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I understand that there is a plan to address communities within Louisiana who have been impacted by storms and other natural disasters. The planned relief will do much to help communities across this state. I am concerned that in providing this much needed relief, communities of color and low income communities who are often left out of the conversation will not be left out of this conversation. I am also concerned that when we do choose to work in these areas, the people who live in these areas do not get to participate on the business side of the equation. If we are truly concerned with building communities that can stand and thrive on their own, we must make sure to support the small business owners and entrepreneurs who live in the very houses and areas we are working to rebuild. Unlike what happened during the Hurricane Katrina recovery, we can not outsource all of the funding to help our people. I am also concerned that there be equitable distribution of the resources from a geographic perspective. Three are communities in the Northern portion of the state that have been greatly impacted by storms and other natural disasters who should be included in the rebuilding of our state. Just as we should include small and emerging businesses from the communities impacted by the storms, we should similarly target small and emerging developers, CHDOs, Community Development Corporations who work in these areas as well.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program will encourage small business participation in the programs established by the local governments giving specific requirements to consider underserved and disadvantaged communities. The program policies will be available on the Restore Louisiana website once the programs are launched.



IDA APA 1 HAMMOND PUBLIC HEARING COMMENTS

FEMA

COMMENT: If I've already received some assistance from FEMA will I still be able to apply for more help? My question was answered already.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Any funds received by FEMA for repair of your damaged home will count as a Duplication of Benefits. However, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home

COMMENT: FEMA would not help us we sent all kind of paper work an SBA could not get them. How will I know if all will help us?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. You may contact FEMA at 800.621.3362 and attempt to appeal their determination. You may contact SBA at 800.827.5722 to get additional information about the status of your application. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the Program may be able to help you repair your home.

COMMENT: When could we have FEMA inspector come?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. You may contact FEMA at 800.621.3362 and request an inspection. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home



COMMENT: I received aid from FEMA and still have this money but can't get estimates (?) from anyone other than one for 4x the money I got. Did I understand the they send contractors?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program offers the option of Solution 1, which means the project is program-managed and the contractor is provided for you by the program, or Solution 2, which allows you to choose your own contractor. For more details, please see Section VIII. PROGRAM SOLUTIONS in the program policy manual, found on our website at <https://restore.la.gov/>. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Where do the money goes to once FEMA recipient? My house is not located in a flood zone could not get insurance for damages. Will FEMA cover?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you have questions about your FEMA application status or benefits, contact FEMA at 800.621.3362. For the Restore Louisiana Homeowner Assistance Program, the program will provide award determinations to eligible applicants, and from there, you will be able to select whether to let the program manage your repairs or if you would rather manage the project with your own contractor and be reimbursed as work is completed. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home

COMMENT: When we sign up, when do we expect go get funds? If you get FEMA money and did not get enough money. The inspector did not come in my home how did he know how much money I need?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you have questions about your FEMA application status, contact FEMA at 800.621.3362. If you received funding from FEMA, you still may be eligible for program assistance, the FEMA funding would just be considered Duplication



of Benefits and subtracted from your total award determination. As part of the application review process, the state will conduct a damage assessment in order to calculate your award. From there, you will have the option to select either Solution 1, which means the project is program-managed and the contractor is provided for you by the program, or Solution 2, which allows you to choose your own contractor. For more details, please see Section VIII. PROGRAM SOLUTIONS in the program policy manual, found Program Manual on our website at <https://restore.la.gov/>. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Exactly what does it take to receive FEMA rental assistance? I am living in a rented trailer (on my property outside my damaged home) FEMA instructed me to rent a trailer. FEMA keeps denying my request because I have not proved the trees fell on my home during Ida.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you have questions about your FEMA application status, contact FEMA at 800.621.3362. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

DUPLICATION OF BENEFITS

COMMENT: My insurance company paid for my roof and damages done by my roof. Trees to be cut down outside and damage done by the tree. Will that count as duplicate funds?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Funds received from your insurance carrier for repairs to the structure will be counted as a Duplication of Benefits.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



HOMEOWNER

COMMENT: Will your program help with house elevation?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the home has to be reconstructed and elevated, there is an allowance available as shown in our program policy manual, available on the program website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. For Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. Further, the Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any elevation only programs for which you might be eligible.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home..

COMMENT: I would like to know if my husband is disabled and when hurricane Ida hit he had back surgery 2-3 weeks before in August 2021. We were unable to move due to the condition of his illness. Our home was damaged due to backed up sewer, electrical surge and a tree fell on my home. However we stayed on one side until mold, mildew, insects caused us to move out temporarily with my sister had to leave our pets and we checked on them every day as far as feeding them, water, etc. Our home is still undone the roof, floors, walls, in the right side which 3 rooms are severely damaged.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation to inquire about available programs that may be able to help you with temporary housing.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



COMMENT: Can I qualify for the program if my home was severely damaged & I already moved to another location, but my damaged home remains @ my old home location? I want to rebuild that home for my children or do rent out.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Program requires that you owned and occupied the damaged property at the time of the disaster event and remain the owner of the property through the program’s final inspection. So as long as you are still the owner of the property, you may be eligible. For more information on program eligibility, please visit the program website at <https://restore.la.gov/>.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: How were the trailers distributed? I was told my area did not qualify. Slidell hurricane Ida. 3.5 feet of water. Will this program help me get my home raised? Multiple flooding in my home city of Slidell says I am on the list.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the home has to be reconstructed and elevated, there is an allowance available as shown in our program policy manual, available on the program website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. For Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. Further, the Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any elevation only programs for which you might be eligible.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



COMMENT: When are you going to start the program? When can I expect someone to come inspect my home?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Currently, the survey, the first step in applying for program assistance, has been open since the January 2022. Survey respondents that meet Phase 1 criteria, as described in the program guidelines, are now being invited in batches to submit applications as of May 11, 2022. After you are invited to submit an application, and after you complete it, you will be contacted within 3-4 weeks to schedule a damage assessment of the damaged property.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Home was damaged in Hurricane Ida and I need help with outside walls and doors. It is a mess. Thank you for your help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.**

COMMENT: Does the action plan become public after HUD approves will it be 2 years before we see the effects of the plan I didn't see a place for totally destroyed homes on survey. Come in and do survey?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We are working as quickly as possible to get surveys phased, applications processed and damage assessors to homes. If you would like assistance completing or updating your survey for the Restore Louisiana Homeowner Assistance Program, please contact our call center at 866.735.2001.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

SBA

COMMENT: I applied for an SBA loan, was denied because my debt to income ratio was not good. My beacon score at the time was 815. Can I apply through this program because I wanted to get my house raised? I live by a canal and it overflows during heavy downpours.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the home has to be reconstructed and elevated, there is an allowance available as shown in our program policy manual, available on the program website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. For Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. Further, the Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any elevation only programs for which you might be eligible.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: I live in a mobile home FEMA referred me to SBA. Approve for SBA loan disaster loan chose to build new but have not started will the program assist with new construction?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. SBA funds can be used in conjunction with program funds, if eligible. SBA proceeds that are drawn for the repair/reconstruction of the house will be counted as a Duplication of Benefits until the project is completed, at which time the SBA loan may be paid off depending on the household income.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: How do I find out if damages were major/severe? Was approved for SBA, homeowners filed bankruptcy so we are at a standstill in regard to repairs that we are trying to complete a little at a time. Can this program help?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The unpaid portion of your homeowner's insurance proceeds can be treated as an unmet need to help defray the duplication of benefits incurred with funds received by SBA, if any, or funds paid by the insurance carrier prior to their bankruptcy.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Income guidelines clarify \$23,700/37,900. SBA loan, what is it? Required? Some owner managed. Do you pay contractor? Does "deaf" qualify as disabled? (2 hearing aids)

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Small Business Administration (SBA) offers lower interest loans to qualifying residents who have incurred damage from a natural disaster. You are not required to have or apply for an SBA loan. One of the program's criteria is a Major/Severe determination by FEMA, therefore, a FEMA application is required to complete a survey for this program. The Restore Louisiana Homeowner Assistance Program offers three options: Solution 1, which means the project is program-managed and the contractor is provided for you and paid directly from the program; Solution 2, which allows you to choose your own Louisiana Licensed contractor; and Solution 3, where homeowners can be reimbursed for repair work already completed on their damaged home, as per program allowances. For more details, please see Section VIII. PROGRAM SOLUTIONS in the Program Manual on our website at <https://restore.la.gov/>.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines



and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

DEBRIS

COMMENT: Is tree cleanup and damage covered? I have a small business and one of my vehicles was destroyed. Can yall help me get back some of my money? Does this help only pertain to when you live and or can it help with damage done to your camp on the river? There is also a lot of damage ____ did not do to my home.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are no programs to remove trees or debris from private property. You may be eligible for assistance with the Restore Small Business Loan and Grant Program. The program policy manual, available on the program website, identifies the costs eligible for funding. This would not be used for your home or camp. Additionally, the Small Business Administration can provide low interest loans to homeowners who have storm related damage which is not covered by private insurance.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

MATCH

COMMENT: Will the PA match program cover Cat A and B?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Yes, the PA Match Program will cover eligible costs with Cat A and B. The PA match policy will be available on the Restore Louisiana website once HUD approves the action plan.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

GENERAL

COMMENT: Where do we apply for parish grants? How do we get substantial damage letter? My income has changed I'm unemployed and applying for disability. I have several issues going on. I also have a small business and been denied SBA loan.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact your local Floodplain Administrator for parish grants and permitting office for substantial damage letters.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT

1. For the interim housing program, can you be reimbursed for money already spent?
2. Who is eligible to have their house raised?
3. Can you be reimbursed for the difference between actual cost to fix your house and what insurance pays?
4. Will you be eligible if FEMA didn't authorize major severe, but you had \$100,000 damages?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

- The Restore Louisiana Interim Housing Assistance Program does not reimburse for funds already paid.
- Elevation is required in certain areas for certain properties. The program has an allowance for elevation, but does not fund "elevation only" projects.
- The program is not designed to make up the difference between insurance proceeds and current costs of materials, labor, etc. You should contact your insurance company to submit an addendum to your claim.
- The FEMA determination must be Major/Severe to qualify for the Restore Louisiana Homeowner Assistance Program. If you incurred \$100,000.00 in damages, we recommend you contact FEMA at 800.621.3362 to appeal their decision.



We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

IDA APA 1 JEFFERSON PUBLIC HEARING COMMENTS

HOMELESSNESS

COMMENT: Outreach- Homeless shelter needed for West Bank (Jeff. Parish). No housing upon the return from storms. Unable to return, no housing affordable.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001, **who may be able to provide assistance.** In addition, the Rapid Rehousing Program that is proposed in the action plan amendment offers rental assistance and supportive services to households displaced by disasters at risk of becoming homeless.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home

INSURANCE

COMMENT: Is there assistance for people with open claims with a bankrupted insurance company?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The unpaid portion of your unpaid claim from a bankrupted insurance company is considered an unmet need. Please consult the Restore Louisiana Homeowner Assistance Program Guidelines, where the Duplications of Benefits section will provide additional details, and be sure to complete the Restore Louisiana Homeowner Assistance Program at <https://www.restore.la.gov/> to take the first step in applying for assistance. Additionally, the survey will assist the program in understanding the outstanding needs of homeowners affected by the 2020-2021 disasters.



COMMENT: Our flood insurance is up for renewal July 17. We are waiting for help for demolition and funding to rebuild. Do we need to pay full insurance waiting for rebuild?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please consult with your insurance company in regards to your home being slated for demolition and how that affects your coverage. We strongly encourage you to complete a survey for the Restore Louisiana Homeowner Assistance Program at <https://www.restore.la.gov/> if you have not already done so.

COMMENT: If you are living or was living in a family home and all insurance was drop due to death of a family member or you able to be help with any of the program for a home that is no longer livable since the hurricane?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please visit <https://www.restore.la.gov/> and refer to the succession guidelines in the Restore Louisiana Homeowner Assistance Program policy manual, , Section B, ii, a. Special Circumstances. We also encourage you to complete a survey for the Restore Louisiana Homeowner Assistance Program if you have not done so. The program guidelines and additional program resources can be found on the program website at <https://restore.la.gov/> that detail how the program may be able to help you repair or reconstruct your home. .

COMMENT: Will this program help with repairs if you are under the deductible?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. . The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you meet the program criteria, you may qualify for assistance. Please refer to the Restore Louisiana Homeowner Assistance program guidelines for eligibility requirements. The guidelines can be found at <https://www.restore.la.gov/>, in Section B of the document. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



FEMA

COMMENT: The cost of supplies have gone up! Is FEMA making determinations based on the new cost of supplies?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms.. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA-related questions. The Restore Homeowner Assistance Program is administered with CDBG-DR funds, not FEMA funds, and the program uses current estimated costs for repairs. You would need to contact FEMA to understand its cost estimates.

We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program to take the first step in applying for assistance. At <https://restore.la.gov/> if you have not already done so. This federal program helps homeowners complete home repairs, reconstruct their homes, and/or be reimbursed for repairs already completed, and you may review the program guidelines and resource documents available on our website at <https://restore.la.gov/> for more information. .

COMMENT: It was mentioned in the meeting that I must have had flood insurance and maintained it when I received money from FEMA in order to qualify for this program to restore my home. I would like to know if this is correct.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If grant funds were received for home repair or reconstruction from a previous hurricane, you are required to maintain flood insurance on the property in perpetuity and if the property is sold, the requirement to maintain flood insurance on the property must be communicated to the purchaser. Please review your previous grant closing documents for applicability. It is correct that if the homeowner did not maintain flood insurance requirements, then the damaged structure is not eligible for the Restore Louisiana Homeowner Assistance Program

HOMEOWNER

COMMENT: If you home owner with a double, will they help to repair your apartment

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please



refer to the program eligibility criteria, Section B.ii in the Restore Louisiana Homeowner Assistance Program guidelines at <https://www.restore.la.gov>. Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Can I hire different contractors or does it just have to be 1 for entire job & does it have to be 1 of the qualified contractors? Will there be more contractors to choose from? Solutions? Will I need before & after pics and how do I know how much I can get reimbursed for? You said it's based on xactimate but I am not familiar with that. How do I know how much I can pay to my contractor to get reimbursed?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. As part of the application review process, the state will conduct a damage assessment in order to calculate your award. The programs' website provides guidelines that fully detail solution choices available to approved applicants. Please note that for program-managed Solution 1, contractors are assigned by the state and the assigned contractor will also complete an inspection of the project after grant execution. All program work completed must meet your local jurisdictions' code requirements. All permits must be closed by the jurisdiction, and items identified on the program's scope of work must be verified as completed to program standards prior to the final payment being made to the Solution 1 contractor. Additionally, the program contractors provide a one-year warranty on workmanship.

If you select homeowner-managed Solution 2, the award letter will have a scope of work detailing for the homeowner what repairs, and how much, will be reimbursed for the items noted. The program used an economy grade selection in price estimates, and applicants will be responsible for any material upgrades or additional costs charged by their own contractor. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Is there a heir & investment housing program?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please



refer to the succession guidelines in the Restore Louisiana Homeowner Assistance Program policy manual, Section B, ii, a. Special Circumstances. The policy guidelines can be found on the program website at <https://www.restore.la.gov/>. The homeowner program does assist heirs only in the case where ownership is confirmed and the heir was an occupant of the structure at the time of the disaster. The proposed action plan also provides a Neighborhood Landlord Program, which will offer funding for landlords to rehabilitate and reconstruct damaged affordable housing units, allowing for community revitalization and housing investment opportunities through available programming. More details will be provided once the proposed action plan has been implemented.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Generational property that has been passed down. FEMA came out but did not go into house.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For questions about FEMA damage assessments or FEMA inspections, please contact FEMA directly at 1-800-621-3362.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: It's been over a year now so when will I get help? I cannot live in my home. When will the funding be helpful for me? I live in a historic area it's very important that my home should be granted funds.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance/temporary housing, please contact the Louisiana Housing Corporation. The state is working through necessary steps to be able to access federal grant funding and administer programs as soon as possible. Please continue to check the program website at https://restore.la.gov for updates on funding availability.



Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Do you know which organization is better Habitat for humanity or your restore program?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program provides grant funding to homeowners affected by Hurricanes Ida, Laura, Delta, or May 2021 Severe Storms, and you may be eligible for assistance. This federal program helps homeowners complete home repairs, reconstruct their homes, and/or be reimbursed for repairs already completed.

Please see the current guidelines that details the available homeowner repair and reconstruction programs to help you with your comparison and analysis at the link below. Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so.

COMMENT: If we started our own project and replacing sheet rock where we can is that okay?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state will conduct a damage assessment in order to calculate your award that can include repairs (Solution 1 or Solution 2 – scopes of work (SOW)) or Solution 3 reimbursement (for completed repairs SOW). Please read the program guidelines on Solution 3 criteria for reimbursement. The program guidelines can be found on the program website at <https://restore.la.gov/>. All Program work completed must meet your local jurisdictions' code requirements. Please be sure to keep records and receipts of materials purchased and repair work done in case the program determines you are eligible for Solution 3.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



SBA

COMMENT: Can someone still apply for a SBA loan now?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For inquiries to SBA, please contact SBA at 1-800-827-5722.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: If you received an SBA loan & it was not enough to complete the repairs would any funds through the program qualify as duplicate of funds?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. SBA funds provided for repair, reconstruction or elevation can be used in conjunction with program funds, if you are determined to be program eligible. Please be sure to review Section G. Duplication of Benefits, section iii in the program policy manual for detailed information and section H for sample award calculation. The policy manual can be found on the program website at <https://restore.la.gov..>

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so

RENTAL

COMMENT: Renter- no affordable homes or units for rent now we're faced with homelessness. What if your homeowners paid you only for living expenses -- & not property damages – legal they now filed bankruptcy (affordable homes) none.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The action plan has set aside funding to specifically address affordable housing and homelessness. The Restore Louisiana Homeowner Assistance



Program does not count living expense coverage as a Duplication of Benefits. Only structural coverage is considered duplicative in calculating a grant award.

COMMENT: Rentees: If your landlord refuses to correctly fix their home and HUD has kicked them off the program. As a renter, who is still seeking housing... what are my options? I have yet to find housing due to rental increase and 10W vouchers for the city of New Orleans. How can I qualify for assistance regarding storage fees?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance/temporary housing, please contact the Louisiana Housing Corporation at 888.454.2001.

COMMENT: Good evening, I greatly appreciate all of the information that was presented on today Wednesday, June 22, 2022. I am in need of housing assistance as a renter. I'm a single mother of a 16 year old daughter and we are in great need to have a decent and safe place to live in the city of New Orleans. I have included all of my personal information that I can be reached. Again, I was glad that I was able to attend.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance or temporary housing, please contact the Louisiana Housing Corporation at 888.454.2001.

GENERAL

COMMENT: My insurance company got bankruptcy they sent me a check with a very low amount and it's not enough to cover all the damages of my house; With this restore program I can have access to repair all the damages of my house? I need a place for rent because my house has areas that needs to be demolished. Actually I'm keeping my homeowners flood insurance. Please I need help you can go and get evaluations for my home. Feel free to contact me by email or phone call.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The unpaid portion of your damages claim from a bankrupted insurance company is considered an unmet need. Please consult the Restore Louisiana Homeowner Assistance Program Guidelines, where the for Duplications of



Benefits section will provide additional details, and be sure to complete the survey for the Restore Louisiana Homeowner Assistance Program at <https://www.restore.la.gov/> to take the first step in applying for assistance. Additionally, the survey will assist the program in understanding the outstanding needs of homeowners affected by the 2020-2021 disasters.

COMMENT: Once the funds are released to the state, how long does it take the state to release to parish, then how long until the parish releases funds to citizens?

1. What type grant can a civic assoc apply for to use the funds to assist their homeowners? Civic assoc. know the needs of the community better than the parish.
2. If a homeowner is over the yearly income limit, what can be done to assist anyway?
3. What year did the govt use to determine the yearly income level? Because it needs to be updated.
4. Why are the processes so slow?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

1. Once the funds are released to the state, how long does it take the state to release to parish, then how long until the parish releases funds to citizens?
 - a. **Once the states' action plan is approved by HUD and a grant agreement is executed between HUD and the state, we will be able to access and administer the federal funding.. Funds may be released to the parish or may be released directly to approved applicants via the state depending on the program.**
2. What type grant can a civic assoc apply for to use the funds to assist their homeowners? Civic assoc. know the needs of the community better than the parish.
 - a. **Civic associations may encourage affected homeowners to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if they have not already done so and review the program guidelines and resource documents on our website detailing how the program may be able to help homeowners repair or reconstruct their homesWhile this particular program is for homeowners only, please see the Program Details section of the action plan amendment for all proposed programs, including those for community revitalization and mitigation planning.**
3. If a homeowner is over the yearly income limit, what can be done to assist anyway?
 - a. **Income is used as a phasing priority. Income is not a determination for eligibility or potential grant assistance.**



4. What year did the govt use to determine the yearly income level? Because it needs to be updated.
 - a. **The 2022 HUD AMI limits are being used. HUD's posted income limits are available at: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/>**
5. Why are the processes so slow?
 - a. **Congress must first pass into law funds available to states impacted by disaster (this took place in Sept. 2021); then HUD must allocate those funds to each of the impacted states (Oct. 2021) and provide a Federal Register Notice (Jan. 2022)). Then, once the FRN is released, the state must draft an action plan detailing how we plan to spend the allocated funding, post the plan for public comment, and submit the plan to HUD for review and ultimate approval.**
6. Please see the program timeline at <https://restore.la.gov/>.

IDA APA 1 OCD WEBSITE PUBLIC COMMENTS JUNE 1 – 29, 2022

SBA

COMMENT: The one thing I would like to make a comment on is the eligibility of funds for local businesses. You see my business went through absolute wind and fire to try to get funding for the COVID federal loan, and we kept getting denied and then we would appeal. We went through these 6 or 7 times, and the federal loan administrator kept telling us that our sheet of paper was "gray" and not white, we just gave up. Our business suffered and we are still suffering the consequences of it today. In a period of time where gun sales have been constant, we have missed out because of those problems, so we hope this won't be the case for these funds. Hard to build an empire when there is little to no support, and you keep getting denied federal funds over the color of the paper your copier makes. I can actually forward the emails if you don't believe me from the SBA.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Some small businesses may be eligible for assistance with the Restore Small Business Loan and Grant Fund. The program policy will be available on the Restore Louisiana website once the program is launched.

INFRASTRUCTURE

COMMENT: WE ARE DESPERATELY IN NEED OF A NEW BRIDGE IN CHARENTON, LA (ST MARY PARISH) IT HAS BEEN OUT FOR MONTHS...AND WE'RE LOOKING AT 8-10 YEARS FOR A NEW ONE.....PLEASE CONSIDER THIS!

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Some



infrastructure projects may be eligible for funding with the proposed Resilient Communities Infrastructure Program. The program policy will be available on the Restore Louisiana website once the program is launched.

COMMUNITY LIGHTHOUSES

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, and Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I am writing to express my support for funding for the Community Lighthouse Project from Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). Below is a statement from the organization spearheading the Community Lighthouse Project, Together New Orleans. "Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans Parish-- occurred as a result of electricity outages and insufficient resilience grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid." I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: As a survivor of Hurricane Ida (Isaac and Katrina, where I lost everything in the flood), I am sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I want to urge the State of Louisiana to include funding for the Community Lighthouse Project for the following reasons: After hurricane Ida, in La Place, LA, I was without electricity for over 32 days. Most of the deaths following Hurricane Ida, including all the deaths in Orleans parish, occurred as a result of electricity outages and insufficient resilience grid hardening is important but we will still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid. I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable, and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm writing to ask that the state allocate funding for the Community Lighthouse Project. Some people can afford home generators, but most cannot. Our weather is becoming increasingly dangerous, and we desperately need backup options like this one for emergencies. This will also help people help each other living nearby, instead of everyone waiting alone for a company to fix their problem.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.



COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. Here in southeast Louisiana, we are facing more and stronger hurricanes, with long-lasting impacts to our state's electrical grid, water systems, communications grid, and communities, especially those along the Gulf Coast. We must have the Community Lighthouse project funded, so that those who cannot leave during one of these disasters will have access to a nearby source of electricity for charging their phones, medical devices (oxygen tanks, cardiac monitors, dialysis machines, etc.), and other vital equipment, plus access to air-conditioning, food, water, and other survival needs. Many of those who will need access to a Community Lighthouse may be caregivers for homebound residents or sick or elderly family members, and/or not have access to reliable transportation to leave before or during the emergency. During Hurricane Ida last year, Mayor Cantrell and her administration did not activate the city's evacuation plan, because they only considered the storm necessary for voluntary evacuations. As a result, many people were left in their homes without electricity, water, or edible food, and without access to medical care or emergency response. Community Lighthouses in our neighborhoods will address these needs during hurricanes or other emergencies.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: As you may know, most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages. One of the reasons for this, is an energy grid unable to meet the onslaughts of increasingly violent storms, fueled by our changing climate. The **Community Lighthouse Project** offers a bulwark against these outages by outfitting community centers – churches, health clinics, etc. – with solar panels and battery storage to operate independent of the electric grid when it becomes incapacitated. Such



centers provide safe spaces for citizens to get out of the heat, refrigerate their medications, recharge their medical and communication devices, perhaps get a meal and share in community while trying to regroup and restore their homes and lives. I **strongly** support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I want to urge the state to include funding for the community lighthouse project for the following reasons: Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid. I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community."Dr. Monica Fabre

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.



I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: As a former resident of Metairie and current resident of Alexandria, I have been negatively affected by several hurricanes and other storms in the past 15+ years. Because I know others have even more greatly affected, I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida). I want to urge the state to include funding for the Community Lighthouse Project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience.
- Grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar panels and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the Community Lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm submitting a public comment regarding Substantial Amendment No. 1, Allocation of Funds for Hurricane Ida. I would like to see the state include funding for the community lighthouse project. This program is an asset to community post-disasters in several ways:



- Most of the deaths following Hurricane Ida, including all of the deaths in Orleans parish, occurred as a result of electricity outages and insufficient resilience.
- Resilience hubs with solar and battery storage are needed in every community statewide so that they can operate independently of the electric grid. Grid hardening is important but we'll still have outages and hubs allow continued access to power.

Supporting this project is an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the Community Lighthouse are safer, more reliable, and accessible to everyone in the community. Thank you for your time and consideration.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: After fleeing to Pensacola last year to escape Hurricane Ida, I found myself obliged to remain there for a week longer than anticipated because of failures in the New Orleans electrical grid. The Mayor actually instructed everyone to stay away. The Community Lighthouse idea as proposed by Together New Orleans strikes me as a clever strategy to soften the difficulties of living with failed grids. In the long run, I anticipate that a network of interlocking micro-grids will do the job more efficiently and effectively, but for now the Community Lighthouses will at least permit people to remain in their homes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: We have an opportunity to help others in light of the continuing and strengthening storms guaranteed to impact our communities. This is a public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:



- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- Grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. Thank you so much for caring.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) The state is in line to receive substantial infrastructure funding, as well as ARPA funds, and recovery funds following the hurricanes that have caused so much damage to our state and its people. As the allocations of these new funding sources are determined, I urge the state to include funding for the **community lighthouse project** that will be piloted in Orleans Parish, and may be expanded across the state, for the following reasons: Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish, where I live-- occurred as a result of electricity outages and insufficient resilience. We need to take immediate steps to make sure this does not happen again. Grid hardening is important but we'll still have outages as a result of storms and there may still be issues in maintaining expansive infrastructure and access to fuel. We need **resilience hubs** in every community of our state with **solar panels and battery storage** so that these centers can operate independent of the electric grid. I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Stormsd. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No.1 (Allocation of Funds for Hurricane Ida). We who live in Louisiana know that each year we have to plan for hurricanes. I lived in New Orleans for sixteen years, moved away briefly, and came back for another three years. I no longer live in New Orleans. Imagine trying to live without electricity for only three days (in some cases one week) in the hot summer months - No lights, no AC, no internet, no wi-fi, God help you if you use a medical device that needs electricity to operate. The community Lighthouse project sounds like a terrific idea. If it comes to fruition it will mean public access to electricity for those days immediately following a hurricane. I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.

I strongly support this Community Lighthouse project as an investment to mitigate the impact of future extreme weather events and the hazards associated with gas-powered generators. Resilience hubs like the community lighthouse are safer, more reliable and accessible to everyone in the community. How wonderful it would be if every community in southern Louisiana would have a community lighthouse available to all the citizens for those post-hurricane days especially.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT: I'm sending this public comment regarding Substantial Amendment No. 1 (Allocation of Funds for Hurricane Ida) I want to urge the state to include funding for the community lighthouse project for the following reasons:

- Most of the deaths following Hurricane Ida-- including all of the deaths in Orleans parish-- occurred as a result of electricity outages and insufficient resilience
- grid hardening is important but we'll still have outages. We need resilience hubs in every community of our state with solar and battery storage so that they can operate independent of the electric grid.



I strongly support this project as an investment to mitigate the impact of future extreme weather events and the hazards associated with the current reliance on gas-powered generators. Resilience hubs, like the community lighthouse are safer, more reliable and accessible to everyone in the community. Erik Hancock
Resident of Orleans Parish

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Community Lighthouse Project may be eligible for funding with the proposed Resilient Communities Infrastructure Program or Hometown Revitalization Program. The program policies will be available on the Restore Louisiana website once the programs are launched.

PRIME

COMMENT: When does OCD expect the PRIME NOFA to be finalized and published?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

For the Laura/Delta funds, OCD is working in partnership with the Louisiana Housing Corporation on the draft of the PRIME NOFA (internally referenced as PRIME 2). We hope to have the NOFA finalized and advertised by Fall 2022.

COMMENT: Thank you to the entire Louisiana Office of Community Development (“OCD”) team for working tirelessly to enact great public policy and programs that ensure our state emerges stronger after each natural disaster. With an intimate grasp of the severe affordable housing shortage in our state and the acute need for disaster-resilient housing, we are pleased that OCD is proposing more than \$400,000,000 to be allocated to a Piggyback Resilience Initiative

– Mixed Income (“PRIME”) program under the State of Louisiana Substantial Action Plan Amendment No.1 for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana (“Draft Action Plan”), published on June 16, 2022. With our extensive track record of deploying CDBG-DR funds for catalytic developments, HRI Communities, LLC (“HRIC”) has successfully utilized the PRIME program and its predecessor, the Piggyback program, to deliver much needed housing in communities such as Hammond, Lafayette, Houma, Shreveport, and New Orleans. We look forward to HRIC’s continued partnership with OCD and the Louisiana Housing Corporation (“LHC”) in developing high- quality, resilient housing. It is our hope that the proposed PRIME funds are speedily deployed so that our parishes, cities, and neighborhoods can not only recover

from Hurricanes Laura, Delta, and Ida and the 2021 Floods, but also attain disaster-hardy housing that residents can quickly return to after the next hurricane or flood. As an experienced development partner of OCD and LHC, we offer the following input on how the current suggested PRIME program can be designed and implemented in the form of one or more Notice of Funding Availability (“NOFA”) processes to achieve both national and local housing objectives. To acknowledge and address obstacles looming over the housing industry and thus maximize the potential beneficial outcomes of the current proposed PRIME program, we suggest that the \$150,000-per-unit funding cap be removed. With growing construction costs, rising interest rates and climbing insurance premiums, catalytic rental developments that serve low- to moderate-income residents (who disproportionately struggle to find attainable, high-quality, and disaster-resilient housing) are becoming increasingly challenging to finance. Cautious debt underwriting with program-restricted rental revenue compound these challenges and create a very real threat to affordable housing production at this time of great need. Given these extreme economic volatilities, it is difficult to project realistic cost restrictions that will remain responsive to financing conditions over even the short-term. A per-unit limit on CDBG-DR funding available per project will inadvertently reduce the number of projects that are feasible – in a time when we need as many high-caliber projects as possible to serve our most disadvantaged and vulnerable populations, particularly in areas offering opportunities for a higher quality of life. In addition to eliminating the \$150,000-per-unit funding cap, we propose the following criteria for competitively scoring projects, which will effectively support the community revitalization of areas that need funding assistance the most while ensuring that new rental developments are built to promptly serve low- to moderate-income households without compromising construction quality or disaster resiliency standards.:

- Prioritization for mixed-income projects that have a 9% LIHTC award from LHC and that further demonstrate shovel-readiness by having obtained or completed survey, design development plans and zoning approvals.
- Prioritization for developments that are already in advanced stages of the HUD Environmental Assessment process and are thus well-positioned for an expeditious clearance to apply CDBG-DR towards housing production.
- Prioritization for 4% LIHTC/tax-exempt bond projects that are immediately adjacent to previously awarded 9% LIHTC projects. In delivering additional scale to those developments, efficiencies are capitalized upon, and cost/benefit of community revitalization is compounded. Furthering this intent, bonus points or other priority consideration should be attributed to 4% LIHTC projects that can be constructed simultaneously with an adjacent, awarded 9% LIHTC project.
- Prioritization for developments in historic districts, downtown districts, and economic development districts.
- Prioritization for projects that will provide residents access to public transportation routes, such as developments in close proximity to a bus stop.



- Prioritization for projects that will create public housing replacement units as a part of a Choice Neighborhood Initiative.
- Prioritization for projects that are receiving support from a local government entity, including local redevelopment authorities, which can take the form of waived impact fees; a Payment in Lieu of Taxes (“PILOT”); a long-term ground lease; public funding of infrastructure improvements; or direct local funding such as a government- provided soft loan (e.g. HOME, CDBG or another form of financing). Such local financing participation is to be evidenced with a letter from the participating government entity.
- Prioritization for projects partnering with cities or parishes through a Development Agreement whereby the developer will implement public improvements, including storm water infrastructure improvements, on behalf of the city or parish.
- Aside from the benefits already afforded to QCTs by the LIHTC program requirements, make no prioritization for projects located within them, as QCTs in a number of MID parishes are not correlated with priority areas for housing recovery developments.

Finally, we believe it would be excellent public policy for OCD to consider a separate PRIME funding round to encourage Resilient Senior Housing to be supported with project-based vouchers from local public housing authorities or governmental agencies. As disasters displace our communities and populations age, an ever-growing number of the state’s senior residents are in desperate need of affordable, high-quality, and disaster-resilient housing. This proposed PRIME Resilient Senior Housing round would present a unique opportunity to provide seniors with safety and confidence in their living environment. Indicative of the needs and attributes of affordable senior housing, we suggest that this particular PRIME round: (a) would not require mixed income tiering; (b) would provide scoring incentive to historic renovation developments that, when converted, often offer housing opportunities in long-underserved communities with high barriers to entry; and (c) would prioritize resiliency innovation in order to serve our seniors especially during disaster events and other times of increased vulnerability.

The PRIME program proposed in the Draft Action Plan holds much promise for tremendously enhancing the state’s rental housing stock to reduce the threat of major storms and severe rain events having negative, life-altering impacts on Louisianians. We appreciate your consideration of this feedback on the Draft Action Plan and hope that these comments, which are rooted in good public policy and informed by our extensive experience in partnering with OCD and LHC to tackle the state’s always-daunting recovery needs, are incorporated into the final plan.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We will take into consideration your suggestions for prioritization and please note we intend to work closely with local governments to ensure our programs align and help implement local plans and projects. Also, OCD has taken rising costs into consideration in program design and budgeting.

COMMENT

NICHOLAS E.HUNTER
MAYOR

June 22, 2022

CITY OF LAKE CHARLES

326 Pujon Street • P.O. Box 900 Lake Charles,
LA 70602-0900
(337) 491-1201 • FAX (337) 491-1206

OFFICE OF THE **MAYOR**

I am pleased that the Louisiana Office of Community Development ("OCD") is proposing more than \$400,000,000 to be allocated to the Resilient and Mixed Income Piggyback ("PRIME") Program under the "State of Louisiana Substantial Action Plan Amendment No. 1 for the Utilization of Community Development Block Grant Funding in Response to 2020 and 2021 Federal Declarations in Louisiana" ("Draft Action Plan"), published June 16, 2022. Similar to its predecessor (the Piggyback program), which achieved extraordinary housing production in the recovery efforts post Hurricanes Katrina and Rita, the PRIME program couples Low-Income Housing Tax Credits ("LIHTCs") and Community Disaster Block Grant- Disaster Recovery ("CDBG-DR") funds to provide Louisianians with high-quality, resilient rental homes they can quickly return to after a natural disaster strikes. Unfortunately, the City of Lake Charles (the "City") is no stranger to such devastating events and unintentionally finds itself perfectly demonstrating the very disaster recovery circumstances to be addressed by the PRIME program objectives. Since Hurricanes Laura and Delta slammed Calcasieu Parish in 2020 in a quick succession, the communities of Lake Charles have been devastated, resulting in an urgent need for new affordable housing that not only addresses the immediate housing crisis but also provides confidence in the continued availability of

housing for families, even when faced with the certainty of future disaster events. Intimately aware of the challenges facing our citizens, the administration of the City of Lake Charles continues to encourage funding from all levels of government to support the affordable and mixed-income housing development needed to initiate and sustain the recovery of our City. I am joined by many across the State that share my excitement and optimism in the promise of the proposed PRIME program expeditiously directing CDBG-DR funds to our community in a manner that finally aids in the recovery from Hurricanes Laura and Delta.

To generate the greatest positive impact from the proposed PRIME program, I am requesting that OCD eliminate the \$150,000-per-unit cap for CDBG-DR funds, outlined in the Draft Action Plan . Calcasieu Parish and the City of Lake Charles - and our entire state, for that matter - urgently need higher-quality rental housing in areas of opportunity for residents. However, paving a financially feasible path for transformative, disaster-resilient developments is a challenge, especially in today's climate of ballooning construction and insurance costs coupled with rising interest rates. The City has downtown neighborhoods that are outside of qualified census tracts ("QCTs") and areas within historic districts, where rental projects, due to lack of incentive and/or costly barriers to entry, struggle to pencil economically. Because of and despite these challenges, however, these are the very communities where new housing opportunities will best serve our City. Given current economic realities and the anticipation of continued cost escalation, we, as people pursuing recovery across the state, will find a per-unit cap of \$150,000 to fall short in offsetting financing difficulties, which would deter the creation of disaster-resilient rental homes in those long underserved and overlooked communities, which are a priority for my administration. Additionally, I would like to take this opportunity to reiterate the scoring and prioritization for projects that reflect good public policy and are those which my administration would encourage for this long-awaited PRIME funding program:

- Prioritization for mixed-income projects that have a 9% LIHTC award from the Louisiana Housing Corporation and that demonstrate shovel-readiness by having obtained or completed survey, design development plans and zoning approvals.
- Prioritization for developments that are already in advanced stages of the HUD Environmental Assessment process and are thus well-positioned for an expeditious clearance to apply CDBG-DR towards housing production.
- Prioritization for 4% LIHTC/tax-exempt bond projects that are immediately adjacent to previously awarded 9% LIHTC projects. In delivering additional scale to those developments, efficiencies are capitalized upon and cost/benefit of community revitalization is compounded. Furthering this intent, bonus points or other priority consideration should be attributed to 4% LIHTC projects that can be constructed simultaneously with an awarded 9% LIHTC project.



- Prioritization for developments in historic districts, downtown districts, and economic development districts.
- Prioritization for developments in walkable neighborhoods.
- Prioritization for projects with a letter of support from the Mayor of Lake Charles, establishing the specific project as a priority within the City's community development/recovery plan.
- Prioritization for projects partnering with the City through a Development Agreement whereby the developer will implement public improvements, including storm water infrastructure improvements, on behalf of the City. Such an agreement to be evidenced by a letter from the Mayor.
- Aside from the benefits already afforded to QCTs by the LIHTC program requirements, make no prioritization for projects located within them, as QCTs in Calcasieu Parish are not correlated with priority areas for housing recovery developments.

The proposed PRIME program presents a pivotal opportunity to finally uplift the City of Lake Charles and Calcasieu Parish after Hurricanes Laura and Delta disproportionately impacted our citizens . I encourage OCD to avoid hindering the recovery promised under the PRIME program by imposing inadequate per-unit limitations and providing scoring prioritization that fails to create high-quality housing in areas where our community most needs it. On behalf of the City of Lake Charles, we greatly appreciate your consideration and welcome the opportunity to discuss further. Nicholas E. Hunter Mayor City of Lake Charles

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We will take into consideration your suggestions for prioritization and please note we intend to work closely with local governments to ensure our programs align and help implement local plans and projects. Also, OCD has taken rising costs into consideration in program design and budgeting.

CASE MANAGEMENT

COMMENT: Water, structural and foundation damage

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided personal contact information. OCD has contacted the applicant directly to provide additional resource information and answer questions regarding relevant programs.



COMMENT: We were insured. But, that didn't cover the interim living expenses for my husband and I and our disabled son (plus two cats and a dog). Disaster Assistance was of little help (I appealed as much as I could and pleaded with the city for help- a developer's malfeasance was involved, something we warned them about before our flood) and we found ourselves in debt to the tune of \$22k. Of course, I'm not counting food, etc. The city said they would help by talking to the developer. Nothing resulted from that. Not a thing. Where is our help?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: I just talked with my police juryman this week And the Calcasieu Admin, along with calls to Army Corps , and public works , It seems that FED money was directed to public body and not so much to private sector,,Over 12 .5 Acres of trees and debris in our back yard. My guess is at ,60-80 full grown pines (Long Leaf)trees down and broken, After Rita ,Darlene and I cleaned all that up With a 35 HP gas tractor and jin pole with a log hook and chain saw ,,took weeks. That was 17 yrs ago , Today were 68 and 71 yrs old. As I cannot maintain the grass with the trees down , At some point there will be a fire hazard, my neighbor is next to me in the same shape. He's 82. So we don't normally ,or I should say have never had to ask for help, But if the resources are there , maybe it's time ? I'm going to have to have this done one way or another, Question.. If I payout for the clean up ,,any chance for reimbursement? When we were young we could just work it off , you know the work and the cost was recoverable. Via our jobs, Not the case now.. We sat threw the eye-walls of Both Laura and Delta We live one mile North of Sam Houston State Park. That's 3 RITA, LAURA, DELTA

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are currently no programs that include reimbursement for tree or debris removal on private property; though the Small Business Administration (SBA) loan program can provide low interest loans to cover uninsured hurricane damage and clean up.



COMMENT: I am a disabled veteran who is about to be evicted from my apartment for the 2nd time this year... I lost my trailer in the hurricanes of 2020 (Laura and Delta) and FEMA denied me several times, when I did get assistance it was too little too late. I have gone through two of these Veterans Homeless programs, so far they only temporarily take vets off the street; but with no real solution to permanently provide Veterans a more permanent and stable place living in Louisiana today... Why, because our governor and politicians turn a blind eye for those in need of housing... Certainly providing disabled veterans a permanent place should have some priority when billions are being sent to Ukraine... Yesterday, FEMA auctioned off some 200 trailers and RV's for under \$20,000 to the public, instead of providing permanent housing for the estimated 3,173 veterans experiencing homelessness on any given day in Louisiana, as reported by (2020) Continuums of Care to the U.S. Department of Housing and Urban Development (HUD). Louisiana spends millions in coastal recovery while Veterans live in the streets... This in my opinion is a travesty that my country can fix but choose not to and ignore myself and veterans across the UNITED STATES alike... It would cost \$12,000 dollars a year per person to continue to house vets because vets cannot work being disabled or on SSDI or on SSI... I have to live off of \$842 a month (that is if SSI doesn't take money out of my check because they tell me they've overpaid me again and want it back...) The apartment I currently live in rent is \$925 just for rent... I found out that most apartment complexes want 2 times the income in order for them to rent out an apartment to you.. You do the math... So if I'm forced to move, I can't afford it... But for all its good intentions, these programs only pay for 4-5 months at a time, then I have to start looking for other housing programs all over again. In which case, I never know if I'll be living in the same place or in the streets again... Having an education doesn't keep you from being homeless, having a disability certainly can though... I know there are those far worse off than me however I am setting up a GoFundMe account for those of you that have a heart to help me, being at risk of homelessness wears far greater on my condition than diabetes and the medication I take that causes me to be sick, depressed and tired all day long... Hopefully, some of you reading this will have pity and spare just a few dollars to keep me from living out of my car... Thanks if you're reading this and please help out those Veterans in need...

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing.

Additionally, we strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



COMMENT: I live in St.James Parish...My home was affected by Hurricane Ida...My home was affected real bad...I had contractor working they had to gut the whole house due to a lot of molding and damage...I put all the funds into the house it's not complete and contractor stop working due to I couldn't pay to finish...I had to get rid of all house appliances and furniture due to molding and electronic stop working...I'm currently living in Fema RV trailer...My daughter and granddaughter had to go stay with her aunt til we able return to home...I would kindly appreciate if my family and I can get some assistance...

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided personal contact information. OCD has contacted the applicant directly to provide additional resource information and answer questions regarding relevant programs.

COMMENT: Currently living with family since the storm. Which we lost everything . And in the process with fema I received one check for 12k and they said that would repair the home. But I had to use that to put clothes on my kids and school supplies. Then months following that I made an attempt to get back in touch with fema and they then sent a check for 15k for repairs and I sent them a repair quote for 30,600 thats what it would take to fix the problem so just trying to see if I can get some down payment assistance to get into a home I have closing cost but just help on the down payment thanks and have a nice day .

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided personal contact information. OCD has contacted the applicant directly to provide additional resource information and answer questions regarding relevant programs.

FEMA

COMMENT: This is a total travesty! I tried tried tried tried to get help from FEMA! They awarded \$22,000 for a home that was 100 years old and in my family - yet needed at least \$69,000 to mitigate, lift, and rebuild! I went everywhere to get assistance - primarily using the foundation that this home represents a piece of Louisiana African American community history! The house was torn down! Now FEMA is bragging on how they plan on helping the white state of Montana (which I have personally slammed on Twitter, Facebook, and Snapchat), yet they (FEMA) only stayed in Houma - after the devastations of IDA (2021) - for 3 months! This is beyond a travesty and as such, this gauntlet of disgust will be carried by me and my family forever! Shame on you - yes you - for allowing the State of Louisiana and particularly, the City of Houma, for being ransacked and ultimately a fallen prey to National Disaster Genocide.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If the home has to be reconstructed and elevated, there is an allowance available to eligible homeowners, as described in the program guidelines, which can be found on the Restore Louisiana website. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 is chosen (homeowner managed), please note that dirt fill as an elevation method is not acceptable. We strongly encourage you to fill out a survey for the Restore Homeowner Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

RENTAL ASSISTANCE

COMMENT

┌───────────┐
 » ⌂*HURRICANES*⌂ «
 IN 🇺🇸LOUISIANA🇺🇸
 └───────────┘
 ▽───────────▽
 ≡—✦🇺🇸✗🇺🇸✦—≡
 >•LAURA~(4559)•<
 Date: August 6, ????
 >•AND•<
 >•DELTA~(4570)•<
 Date: October 10, ????
 ≡—✦🇺🇸✗🇺🇸✦—≡
 ▲───────────▲

ARE YOU SURE ABOUT THIS....
 BECAUSE, WE ARE GOING TO BE HERE ALL
 NIGHT LONG!!*THAT’S FINE WITH ME*
 AND I HOPE YOUR SITTING DOWN VERY COMFORTABLELY!?!AND NO!! I’M NOT



JOKING!!!

SO, TODAY IS...

MONDAY, JUNE 28, 2022

@ 2:04 PM (CST)

ALMOST (3) YEARS AFTER... HURRICANES, >*LAURA* & *DALTA*<
DESTROYED MY HOME!!!!

AND AS OF TODAY...

JUNE 28, 2022 >•< ^*FEMA*^ HAS

DONE X X NOTHING X X !!!!!

MY HOME IS NOTHING BUT *POISON*,

THE (ONLY) THING THAT (I) GOT FIXED
WAS MY *ROOF*, AND *FEMA* STILL
OWES THE COMPANY, \$4080.00< FOR
AT LEAST (2) YRS. NOW...

THE COMPANY HAS A (LIEN) ON MY
HOME AND AGAINST ME, BECAUSE
FEMA APPROVED ME THE 1ST TIME
AND ASSISTED ME WITH RENTAL
ASSISTANCE. YES, THEY DID DO THAT, BUT I HAD TO PURCHASE A
NEW WATER SOFTENER, AND GIVE
THE REST OF THE RENTAL MONEY TO
THE ROOFING COMPAMY!!!!YES,
ALL OF IT!!! SO I WENT A SECOND
ROUND WITH *FEMA*,
X (NOT ELIGABLE) X THEN COMES



THE 1ST. APPEAL... X NOTHING BUT,
X PAPERWORK X OKAY DID THAT,
FAXED THEM EVERY PIECE OF PAPER
YOU COULD IMAGINE, (14 SHEETS)!?
I CALLED, THEY ONLY RECIEVED (4)?
WHY? BECAUSE YOU HAVE SO MANY
PEOPLE AROUND THAT FAX MACHINE
ALL DAY LONG, HOW IN THE HELL IS
YOUR PAPERS GET TO THE 100 PEOPLE YOU HAVE TO SPEAK TOO!?
HOW!?!?!? HELP ME OUT HERE!!!

IF YOU SPEAK TO 100 DIFFERENT PEOPLE ABOUT YOUR FILE, AND THEY
SPEAK TO A 1000 PLUS PEOPLE A DAY....
HOW WILL THEY REMEMBER ABOUT
THE 14 SHEETS OF LEGAL DOCUMENTS THAT I FAXED TO THEM (FEMA)... I HAVE NO IDEA
WHO HAS
MY PERSONAL DOCUMENT INFORMATION!?!? NOW, YOU TELL
ME HOW SHOULD I BE FEELING, LIVING IN THIS WET, BLACK MOLD,
BUGS COMING OUT OF THE WET WALLS AND MOLDING, WATER COMING OUT OF MY
ELECTRIC SOCKETS LEAKING DOWN MY WALLS TO THE FLOORS!? MY BACK
DOOR IS SO WET AND MOLDED, IT
STINKS!!! IT'S ABOUT TO COME
OFF THE WALL THAT NEEDS TO BE
CHANGED, BECAUSE THE ENTIRE WALL OF MY MOBILE HOME 16X80
HAS SO MUCH WATER INSIDE OF IT,
ITS MAKING LITTLE BULLET HOLES
IN MY SHEETROCK, YES THE INSALATION IS SOAKED WITH WATER..
IT HAS RAIN INSIDE MY HOME IN ALMOST EVERY ROOM, THE CIELING
IS WARPED AND FULL OF WATER SPOTS, ITS DISGUSTING!!! I'VE
SENT *FEMA* (3) APPEALS...



WELL, AS YOU CAN SEE I AM GIVING
YOU FEEDBACK, SO IF IM CORRECT
YOU CAN SEE THAT STILL TODAY,
WE ARE LIVING IN THIS POISON
TRASH!!!

AND AS FOR *[FEMA]*, THEY BETTER
GET READY, BECAUSE I'M GOING TO
HIT THEM SO HARD, THEY WON'T
KNOW WHAT HIT THEM....

FULL BLOWN PISSED OFF *KARMA*,
I'M HER SISTER..
AND I WILL BE FEMA'S WORST
NIGHTMARE!!
I'M TIRED OF BEING PISSED OFF AND TIRED!!!!

THEY CAN GET READY...
THEY WILL BE {*REPLACING*} MY
HOME, [*NOT*] REPAIRING SHIT!!
THIS IS {**UNREPAIRABLE**} AND
I'M NOT LIVING IN A WET AND MOLDED HOME!!!
THERE EVEN GOING TO
{*REPLACE*} EVERY PIECE OF..
FURNITURE, CLOTHING, SHOES,
APPLIANCES, {**EVERYTHING**}!!

I WILL NOT PUT ONE PIECE OF
ANYTHING FROM IN HERE, IN MY
NEW HOME....



NO WAY IN HELL, WILL I LET THEM
GET AWAY WITH THE WAY WE WERE
TREATED...

THEY SCREWED THIS UP...

I JUST HAD TO SUFFER LIVING THIS
WAY... I'D LIKE ONE OF THEM TO
LIVE IN HERE FOR A WEEK....

THEY WOULDN'T MAKE IT A DAY
LIVING HERE!!!

AND THIS FEEDBACK, IS JUST A TASTE OF WHAT I HAVE ON FEMA!!!

THEY JUST RECIEVED NEW FUNDS FOR
LOUISIANA...

I WILL! HAVE MY NEW HOME, SOON

REALLY SOON!!!

HERE I COME FEMA!!!!

GET MY FUNDS READY!!!AND I'M
PICKING OUT MY OWN HOME AND
FURNITURE AND ACCESSORIES!!!

YOU WILL HAVE NOTHING TO DO WITH TOUCHING MY NEW HOME!!!!

MY MONTH AFTER MONTH EYE INFECTIONS!!!



THE DISABLED MAN I TAKE CARE OF
IS A DIABETIC, AND HE JUST FOUND
OUT HE HAS {*CANCER*}!!

YEAHHHHHHH, DEANNE CRISWELL
AND ALL IM GOING TO SAY TO
YOU, YOU BETTER PRAY HE DIDN'T
GET THAT FROM FEMA MAKING US
LIVE IN THIS SHIT!!!

AND THAT IS MY TRUTH

I WANT MY NEW MOBILE HOME

AND EVERYTHING IN IT TOO!!!

NOWWWWWWWW!!!

AND IM NOT PLAYING AROUND
ANYMORE!!!

YOU WILL FIX WHAT YOU DID
WRONG, FOR {3 YEARS}!!

AND I MEAN NOWWWWWWWW!!!!

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. The state is working through



necessary steps to be able to access federal grant funding and administer programs as soon as possible. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.

COMMENT: Do you have a rental assistance program for people not in their home due to Ida we are living with my nephew which is now becoming a problem we really need to leave but can't afford it, can you help us.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided personal contact information. The person was contacted directly and provided with additional information.

HOMEOWNER

COMMENT: I am very disappointed in the State's response to the people suffering with Hurricane Damages & Flooding in 2020 & 2021. Just because a person has insurance does not mean they have enough money to repair their homes! Specifically, I had damages from Hurricane Laura 2020 & Major Flood damages from Hurricane Delta 2020 & again Flooded on May 17, 2021. My contractors had to start all over again by having my home gutted out again! As of today, 6/28/22, I am STILL NOT living in my home. I lived in a Lafayette hotel for 2 months (using my personal content month) until FEMA told me I was no longer eligible to receive any funds. SO, I checked out on Dec 31, 2020 & move in with a cousin in Natchez, MS. I traveled back & forth to Lake Charles trying to get my home repaired. Unfortunately, I was taken advantage of by hired contractors & as of today, I STILL DO NOT HAVE A HOME TO LIVE IN! I am a single (divorced), Senior Citizen (69 on 7/14) and Retired resident of LA since 2/28/2009. I have worked 31 years for the State of LA Dept of Social Services & dedicated my life to Children & Families. Since that time, I worked for my church as a custodian & part time for Kohls Dept Store as their Greeter & City of LC Events Usher until the Covid Pandemic began in March 2020. I haven't worked since & only have my Fixed Retirement income to depend on. By the 5th of the month I am out of money. I'm not eligible for FOOD STAMPS bc of my income & I live alone. So sometimes I depend on free food giveaways in the Parish to make ends meet. I have signed up for every disaster assistance program that came to my attention. A lot of them I was told I wasn't eligible because of my income, although I couldn't even pay some of my bills, get medication or even buy food monthly. I was told to complete the Restore.LA survey & I did. I even attended the meeting that was held. We listened to people talk & talk but NEVER HEARD FROM ANYONE TO HELP ME. I sure would like to know who you helped?? I had surgery on June 16, 2022 & cannot come out to meeting that is scheduled for today June 28, 2022 in Lake Charles, La. I need someone to call me and let me know where I stand. I have called 4 lawyers (they



only want insurance claims not interested in contractor problems), called Calcasieu Parish's DA office & spoke to Ms Linda Boudreaux. She spoke with me 4 times & scheduled an appt to bring in my verification. On the day of appt, she claimed I did not have an appt with a Detective because she said I didn't have enough money owed to me from contractors. Although the contractors say they used \$107K on my home & I can't even live in it! NO KITCHEN, NO PLUMBING, NO GAS METER, NO BATHROOMS, NO NEW ROOF. NO UPDATE ELECTRICAL ETC. I was so upset & hurt that I cried most of the evening. This is not right!! I also was part of the Watershed Buy Out Program. They SAID WE HAD \$30Million for my subdivision. Unfortunately, my home was in the Priority 2 section. Last week, Ms Barbara Harrison told me that all money is gone & there is no more money allocated to the program at this time for Priority 2 & 3. I was told that I am eligible for a grant from the City of LC and signed my completed application on June 6, 2022 but haven't heard from the city yet! I want to go home! I have had my furniture in the store's warehouse since March or April of 2021. I have had to change the delivery date several times!! SMH I moved back to Lake Charles & been living with my only sibling since Oct 28, 2021. I thought I was going to be in my home, at least, by December 2021. My contractors stopped working & claimed they didn't have any more money. I WANT TO GO HOME & LIVE THE REST OF MY LIFE IN PEACE. I'm afraid because we are in Hurricane season again & my house is not repaired from Hurricanes of 2020! Please help me to get into my home soon. I had a 3 month old puppy whn this all started. My dog is now 2yrs old & has lived in so many places. I'm tired & very disappointed! I know I'm not the only person, I have a a lot of neighbors or friends living in gutted out houses, some were not even gutted out because they had no insurance or assistance, dealing with lack of insurance money and/or lying/incompetent contractors! We need help in Calcasieu Parish PLEASE! I'm praying that GOD OPEN YOUR HEARTS & FINANCIAL GRANTS TO HELP US!

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided direct contact information and received a follow up call and resource information for relevant programs.

COMMENT: Founded in 1941, the Home Builders Association of Greater New Orleans (HBAGNO) provides members with continuing education, events for networking opportunities and advocacy to protect the home building industry. The HBA is a non-profit professional organization serving nearly 1,000 builders and associate members encompassing seven parishes throughout Louisiana, including Jefferson, St. Bernard, St. John the Baptist, St. James, St. Charles, Plaquemines, and Orleans. The Home Builders Association of Greater New Orleans is currently celebrating 80 years as the voice of the residential housing industry across the metro area. The HBAGNO has been reviewing the State of Louisiana Substantial Action Plan Amendment No. 1 for the Utilization of Community Development Block Grant Funds in Response to 2020 and 2021 Federal Declarations in Louisiana and

provides the following comments during the Public Comment Period from June 1 – June 30, 2022. In general, we have three major points to offer with regards to funding availability.

- Adding resilient retrofits and improvements eligibility to the Restore LA program for homes that were both damaged in the storm or homes that were undamaged but still in the MID (Most Impacted and Distressed) areas;
- Devote program funding to workforce development of the trades due to shortages of skilled workers to repair or rebuild homes. Design and implement a program that will grant monies directly to non-profits, schools or centers; and
- Increase program cap flexibility due to increase/volatility of building materials.

In the first point, there is a need to provide gap funding between replacement cost of structures, in particular roofing, and the cost of repairing using more resilient or even fortified repair standards that can reduce future damages incurred. Such investment is not only needed for the welfare of our residents in these communities but also as an overall strategy to attract property insurers back to the state. Insurers know the impact resilient retrofits bring to our communities and demand them before returning. Per Ron Camarotta at the Louisiana Department of Insurance, our state is facing a critical shortage of property insurer forcing an increasingly larger percentage of property owners into the state plan.

The second point aims at the challenges our industry faces in trained labor participation for the trades, particularly residential construction. The state of Louisiana currently has approximately 7,000 unfilled jobs in the residential construction trades per data from the national Association of Home Builders (NAHB). The HBI solicited and received over \$2 million in private donor funds to fund a no-cost residential construction training academy (BuildStrong Academy) in New Orleans which opened in March. However, our capacity is limited to 500 graduates per year. Far more is needed.

The third point speaks to the supply chain volatility we have seen in most industries and certainly ours. Framing lumber has seen extreme volatility rising from less than \$300 per 1000 board feet to a peak of \$1,600 and remains currently in at \$600. Electrical panels, transformers, oriented strand board, various adhesives, electronic instruments, flexible tubing, insulation, and windows are suffering severe price increase and substantial delivery delays drive prices in unprecedented ways with deleterious effect on costs to the builder and price to homeowners. Cap flexibility is needed even if a special approval process is deemed necessary. These cost fluctuations are originating through market conditions, not builder greed.

In addition to these general concerns, we wish to draw attention to a few specific areas:



- Pg. 94 - Cost Effectiveness
 - Increase flexible language here due to materials volatility
- Pg. 103 - Economic Revitalization
 - Add language for workforce development
- Pg. 129 - PRIME Program
 - Check program for possible use of resiliency upgrades
- Pg. 132 - RESTORE LA
 - Add in Resiliency Retrofitting for language Future Disasters
- N/A - Workforce Development Funding was Omitted from the Proposed programs and funding

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please see below to address your three points specifically:

- Adding resilient retrofits and improvements eligibility to the Restore LA program for homes that were both damaged in the storm or homes that were undamaged but still in the MID (Most Impacted and Distressed) areas;
 - **The Restore Louisiana Homeowner Assistance Program will be building all Solution 1 (program managed) reconstructions to the IBHS Fortified Gold Standard. Approved applicants contracting with their own builder also have the opportunity to be reimbursed with an additional per square foot pricing differential once they present an approved completed final inspection and proof of all other requirements met for building to the IBHS Fortified Gold Standard. The Program also has the same process in place for roofs that are replaced that meet the requirements of IBHS Fortified Roof Standards.**
- Devote program funding to workforce development of the trades due to shortages of skilled workers to repair or rebuild homes. Design and implement a program that will grant monies directly to non-profits, schools or centers; and
 - **A workforce development program may be eligible with the proposed Hometown Revitalization Program. OCD will be working closely with Louisiana Workforce Development and will be contacting multiple industries, like yourself, to receive specific training needs.**
- Increase program cap flexibility due to increase/volatility of building materials.
 - **The Restore Louisiana Homeowner Assistance Program estimates awards using June 2022 Xactware pricing data which reflects insurance industry standards for the pricing for materials,**



and all awards are subject to the program caps in place. Once an applicant closes on their grant, they have a specified time to complete their home repair project and the pricing will remain in effect as of the date of their grant award acceptance.

GENERAL

COMMENT: I recently attended the Restore meeting in Tangipahoa Parish. I have a few questions. 1. Will there be a 4pm meeting in Reserve 7/29 for the officials? 2. How can I get more information on the FEMA Match Programs? 3. Who is over Restore Louisiana?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There was a meeting held on in June 29 in Reserve for local officials. OCD is in the process of developing the policy document for the FEMA Match program and it will be posted on the Restore Louisiana website once the program is open. OCD administers the Restore Louisiana programs.

COMMENT: I watched the webinar and public presentation yesterday. I am a community planner for several areas impacted by IDA. From what i saw and heard, ti seems to be a well-thought out plan of action with various options available to find resources and get help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval.

COMMENT: I don't have a question but just a comment. I would like to thank you all for giving us a chance at getting a home. We lost everything in Ida & had to demolish it. We have nothing. I'm not sure if we will qualify & get anything. But thanks again. Being elderly & having adopted two young special needs children gives us hope. Again thank you for this program.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage



you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the Program may be able to help you reconstruct your home.

COMMENT: I was wondering if you recorded the Public Hearing for Restore Louisiana from the virtual meeting held last night, June 21, 2022? If not that meeting, has one of the previous meetings been recorded? I reviewed the slides and they were very helpful, but was hoping the presentation might have been recorded.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. A recording of the virtual meeting is posted on the Restore website here: <https://restore.la.gov/public-hearings>.

COMMENT: The only comment that I have regarding these programs, is that I sincerely hope that those in charge of disbursement and program management do so with a sense of fairness. Too often, money allocated runs out too quickly and those in need are not able to get assistance. I am not confident in local leadership's ability to handle managing a program of this size and magnitude and as someone whose home flooded on May 17th after never having flooded before, I am praying for assistance to either elevate and restore or be bought out. There also needs to be something in place that ensures that information gets out to everyone.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana website is home to many resource documents including an explanation of how survey respondents are prioritized, and we have also made available the public meeting presentation so you may review the proposed programs, budgets, and phasing process for the Restore Louisiana Homeowner Assistance Program, found at <https://restore.la.gov/public-hearings>. The website also has a News tab where information is disseminated, and we encourage you to sign up for program updates so you may be in the know on program updates and funding availability. We strive to keep our homeowners, governmental and NGO partners notified throughout the entire process.

We strongly encourage you to fill out a survey for the Restore Homeowner program at <https://restore.la.gov/> if you have not already done so, and please review the program guidelines and resource documents on our website detailing how the program may be able to help you repair or reconstruct your home.



IDA APA ST. JOHN 1 PUBLIC HEARING COMMENTS

GENERAL

COMMENT: We like to have help and the people we speak to can be on the same page. Every time you call you get a person who act if they have no idea of what we need to get housing, funding, different calls different things are told to you. The info need to be clear. A lot of people don't have internet, don't have access when it is close to disaster. Also we use mail, which mail in LaPlace has been horrible, its like going in circle. Which cause a lot of stress.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the available resource documents on the same website that detail how the Program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: I am trying to help my 86 year old mother. Are there any funds available to assist elderly homeowners to call and remove trees on their property that has fallen over the land property cause by Ida? We have severed trees on our property that were damaged and blown down by Ida that is preventing us from cutting the regular grass. It has also cause the grass blocked by these fallen trees to grow over 3 feet. We were not aware a program like this existed right after Ida to help us remove these trees.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: I have 2 questions. 1. How can we qualify for Restore when we have State Farm insurance and we did not get any money for repairs due to a \$14,000 deductible? FEMA only gave us money for evacuation costs and that was only \$4,000. 2. When will St. John Parish go to the streamlined approach like Lake Charles did after Hurricane Laura? We have insurance claim in litigation with State Farm and the process allows State Farm to continuously make us wait and never solve our case/claim.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. Monies paid as an insurance deductible may offset your duplication of benefits. Currently survey respondents that received \$25,000 or more in insurance proceeds are in a later phase of the program so that we may prioritize the most vulnerable for assistance as per HUD requirements. After these needs are met, and as funding is available, the Program may open to additional phases. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done so, please review the available resource documents on the same website that detail how the Program may be able to help you repair or reconstruct your home. In regard to your question about St. John Parish adopting the Lake Charles approach to insurance, please contact your local government office or legislators.

HOUSING

COMMENT: How can FEMA make any determination when every FEMA person that come out, the first thing they said was they can't come in your home because of Covid, so how can you show your damages?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done so, please review the Program guidelines and resource documents on the same website that detail how the Program may be able to help you repair or reconstruct your home.

COMMENT: What will happen for people who paid for wind & hail insurance, but the wind & hail insurance company went into receivership and approved funds were not paid? Is it still possible to apply for a FEMA trailer to place at our home address if we have not been able to move back into our home yet?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. Monies that should have been paid by your insurance company, but were not due to your insurance company's bankruptcy, will not be counted as a duplication of benefits and will be considered an unmet need. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done so, please review the



available resource documents on the same website that detail how the Program may be able to help you repair or reconstruct your home.

COMMENT: Will any funds be allocated for the elevation of homes that were impacted by Ida? Is there an allotment for rental assistance?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The action plan details the allocation of funds for rental assistance across several programs. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing.

If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated in our policy document. Please note that the RLHP Solution 1 Program option does not elevate slab on grade homes. If Solution 2 is chosen, dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the Program may be able to help you repair or reconstruct your home.

FEMA

COMMENT: I have been in 2 storms, the first storm FEMA didn’t give me anything. This last storm FEMA gave me \$500 because I had insurance. My home is fixed now, but still need windows. Is there a program to help with that? In both storms lost everything I had. I asked the parish about raising my home, no one knows when that will happen. FEMA needs to come around in the flood areas to see why we need help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2



(homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I feel FEMA didn’t accommodate me, they weren’t able to inspect my home. They didn’t even come inside. I had major damage, about 1.5 feet of water.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for questions regarding your FEMA determination. We strongly encourage you to fill out a survey for the Restore Homeowners program at <https://restore.la.gov/>. **If you have not already done so, please review** the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: How can you have 4 ft. of water had to hire people (?) remodel from house lost (?) everything but decided no major damage? No one showed up to my house.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for any questions regarding your FEMA determinations. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: Was told FEMA was not allowed to enter homes. So they stood on the porch and took pictures.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so,**



[please review](#) the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: FEMA did not make a determination. FEMA denied me because I had homeowners & flood insurance.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for questions regarding your FEMA determination. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: FEMA denied me because I have flood insurance but my flood insurance has not paid me. I am in the appeals process for both. It's not fair that people like myself are being held in limbo. FEMA has not even made a determination to my knowledge. For the same reasons, the parish would not provide me an application for elevation.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for questions regarding your FEMA determination. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: FEMA needs to redefine their definition of flood, cause when the wind blows your roof off, and it rains for the next 3-4 hours for the next 4-5 days and you're walking in 4-6 inches of water. That's a flood.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for questions regarding your FEMA determination. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.



HOMEOWNER

COMMENT: I wanted to know about the grants to raise my home. FEMA didn't come inside my home. We sat in the garage and got my information. FEMA told me because I had home and flood insurance I was not eligible to receive FEMA. I had a foot and a half of water in my home. I still have the photos. I still have repairs that need to be done. I need to finish my back bathroom.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: This is the second time I was flooded, need home elevation. Over 20 thousand contents insurance paid.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local flood plain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already**



[done so, please review](#) the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: What is being done to raise homes, like mine, that has flooded twice? We have no problems with this until the care (?) fixed N.O. and St. Charles parish. I had so much damage they had to remove my bricks. My flood insurance gave me too much heartache—they warped against instead of to help (?). Flooded in 2010—everything was new well picture still would not cover entire fees. (?)

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local flood plain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I live in St. John the Baptist parish and I really need help to fix my home. I am still trying to get it done. But I don’t have the resources. So I would appreciate any help that you can give me.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. [If you have not already done so, please review](#) the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.



COMMENT: We need help to get back in our home. Right now we live in an RV. We have homeowner's insurance but they don't want to pay the money. So the people with insurance need help too so please help us so we can get back in our home.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: My name is Helen Young. I am 81 years old and I have lived in St. John the Baptist Parish for 30 years. I have paid for my home and been a victim of 2 hurricanes, Isaac and Ida. I lost everything!! I have applied for home elevation and have been calling from (?) day one of my application. What will it take for me to be among the people who are counted as eligible for elevation? Cannot...

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document.. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.



COMMENT: The house was completed; but has flooded twice in 4 years with 4 feet of water. The federal grants to raise my house is my concern. I've called the parish grant office as well as the assessor's office. I have yet to peak to someone or get a call back. How do you apply for a grant to raise the house to keep it from flooding? \$131,000 estimate to raise the house that I paid \$106,000.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local flood plain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: I need help desperately. My home is really messed up and I don't have the funds to fix it. I'm begging you for help not to beautify the home but to make it livable for me to get back in it. I'm a very sick person and it is trouble getting in and out of the FEMA trailer even though I appreciate...

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.



COMMENT: Why don't we have elevation program in place yet? Why are we needing to wait for flood protection levee to be built? My home has flooded twice. Hurricane Isaac & Ida. Any nobody knows about get these homes to be elevated. President Biden & Harris have an immagintion (?) program in place and nobody in this parish knows about this program why? This program started in April for our parish and...

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: My immediate concern is hazard mitigation. Our home flooded in 2012 during Hurricane Isaac and again in 2021 for Ida. I am seeking a government grant to have my house raised.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program



may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: Not paid for current prices for supplies for rebuilding by NFIP. Contractor does not want to do the work to reassess the cost for measurements. Help for our area come much too slow. Adjusters are not fair in assessing the damage. I was paid same amount of money from last flood—even though the prices have tripled. I would like a buyout program or reimbursement for a SBA loan—I was told there are no grants at that time of loan. I want to storm proof my home—can't elevate because of property line by parish, won't allow me to elevate.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done so please review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home or potentially buyout your home if Solution 4 criteria is met. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: How are they prioritizing the homeowners anticipating home elevation? This is my second time getting flooded out. Over 50% of structure damage and lost all content and personal property. Is there a program in place to assist homeowners via a grant to get improvement to the residence to prepare for future storms, ex: storm windows on doors, storm shutters, etc.? A mitigation grant?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document.. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local flood plain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program



may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: Do you have a program to help demolish a home that is unlivable but the homeowner died after Ida and survivors have no resources to demolish?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program requires that you owned and occupied the damaged property at the time of the disaster event and remain the owner of the property through the programs' final inspection, however, there are special circumstances related to ownership as outlined in the program manual in section A. Applicant Eligibility Criteria, i. Ownership, c. Special Circumstances Related to Type of Ownership. We strongly encourage you to fill out a survey for the Restore Homeowners program at <https://restore.la.gov/>. **If you have not already done so, please review** the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: My sister (age 87 w/ disability) and I (age 78 and partially disabled) need help with the following: house needs to be elevated, will need assistance to repair house (which has over 2 ft. of water from Ida) because insurance (homeowners & flood) did not pay 100% of face value of policies.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover "elevation only" projects. If that is your situation, please contact your local floodplain management office to find out if they have any "elevation only" programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.



COMMENT: How soon will it take before the people are able to receive money to help them restore their home? I am hearing the speakers, but I know our names (?) can be placed in your system, we're hoping not to be delayed & not hear from anyone. We want to get back into our home, we do appreciate that you all are wanting to do for all the people.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. OCD anticipates making initial awards to qualified homeowners who have completed the program survey and application very soon after the state and HUD finalize their grant agreement. The first step is to complete the survey, and you will then be phased for application submission according to the criteria outlined in our program guidance document. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: Can yall help homeowner who has insurance but their home insurance company went bankrupt? Is there a way yall can cut all the fallen trees out our yards?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Monies that should have been paid by your insurance company, but were not paid due to your insurance company's bankruptcy, will not be counted as a duplication of benefits and will be considered an unmet need. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done so, please review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: Have problem with flooding in my area, but because it's considered a non-flood zone even though we flooded several times, we can't get assistance to help raise our home.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document.. Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

COMMENT: What are requirements to qualify for grant to raise our home that has flooded twice from hurricanes & had water come in from heavy thunderstorm?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If a homeowner qualifies for the Restore Louisiana Homeowner Assistance Program and their home has to be reconstructed and elevated, there is an allowance available as indicated shown in our policy document Please note that the Restore Louisiana Homeowner Assistance Program Solution 1 option (program managed) does not elevate slab on grade homes. If Solution 2 (homeowner managed), dirt fill as an elevation method is not acceptable. The Restore Louisiana Homeowner Assistance Program does not cover “elevation only” projects. If that is your situation, please contact your local floodplain management office to find out if they have any “elevation only” programs for which you might be eligible. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. If you have not already done, review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

RENTAL

COMMENT: 6.29.22 No name. Will there be help for landlords? Will it be a grant or loan? What phase will it be?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. The action plan proposes programs that provide funds for landlords to rehabilitate existing units.

CASE MANAGEMENT

COMMENT: Keep getting misinformation. Said I was denied for FEMA trailer, my house is torn down. I'm a 65 senior who needs help, not all the red tape. I ask what I need to do. I still don't get the help I need, please help and I'm trying to do as they ask me. Need of funds to help. Mail has been horrible in LaPlace area. Who can help with review of case?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Corporation at 888.454.2001, who may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/>. **If you have not already done so, please review** the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. If you need help completing the survey or have program questions, please contact the call center at 866.735.2001 for assistance.

IDA APA 1 TRIBAL PUBLIC HEARING COMMENTS

MISCELLANEOUS

COMMENT: There was no beneficial information provided beyond what anyone could find online, that is not community involvement. A quagmire of bureaucracy, prolonged and complicated steps presented to a part of the state and country that has the lowest level of education. I am a local attorney with a MORP (masters in urban & regional planning) with a specialization in housing & community development. This was not community engagement.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The information provided in the public hearings held by the Louisiana Office of Community Development are in accordance with its citizen participation program guidelines and provide a full explanation of action plan details along with an opportunity for question and answer. In our opinion this is acceptable community engagement.



RENTAL

COMMENT: Affordable housing has always been built by multi-billion dollar corporations who get government contracts due to their long and substantial experience in this area. There has never been a program for the mom & pop landlord. Undoubtedly, most of the money the government expends for affordable housing in Terrebonne will go to those corporations. What exactly will be provided to mom & pop landlords who own 4 single-family rentals? Hiring outside contractors/developers is not acceptable at all. Train local developers!

RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please note the action plan amendment for the Neighborhood Landlord Rental Program is designed to work with local landlords and local contractors who can qualify for grant funds to build affordable housing. These programs do include individual property owners.

GENERAL

COMMENT: Regarding the Hometown Revitalization program, what type of projects would qualify as facilitating the return of commercial districts and business to profitability? How will return to profitability be measured? Buyout option: will this option follow the uniform (?) relocation as provision?

OCD RESPONSE Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program policy will be available on the Restore Louisiana website once the program is launched. The policy will explain what types of projects will be eligible for the use of funding. The intent of the program is to allow multiple uses of the funds to revitalize specific underserved or disadvantaged areas and assist small businesses in commercial districts. Regarding your question about the Restore LA Homeowners Solution 4 Buyout Program, yes the buyout program adheres to all guidelines in the Uniform Relocation Assistance and Real Property Acquisition Policies Act. We also strongly encourage you to fill out a survey for the Restore Homeowners program at the same website if you have not already done so.

COMMENT: Is it possible that homeowner flood insurance program will be expanded to small business recipients? Can you give an example of an eligible hometown revitalization project? Neighborhood landlord rental program: how much of the loan is forgivable? 100? Who qualifies the renters & determines the amount of rent? Can it be done by reimbursement?



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Hometown Revitalization Program policy will be available on the Restore website once the program is launched. The policy will explain what types of projects will be eligible for the use of funding. The intent of the program is to allow multiple uses of the funds to revitalize specific underserved or disadvantaged areas or provide services to LMI populations. Concerning your question about the Restore Louisiana Homeowners Flood Insurance Assistance Program, that is for homeowners only.

HOMEOWNER

COMMENT: Within definition of first time homeowner, are owners of mobile home eligible? When demolition and rebuild is necessary, how is design of new homes handled?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program is available to mobile homeowners that owned and occupied the damaged mobile home unit at the time of the disaster event. The mobile home can be on owned or leased property (i.e.- mobile home on family land, tribal land or at a mobile home park). There is also an option as noted in our guidelines that will allow a mobile homeowner to convert to a stick built home with the grant based on the type of mobile home less any duplication of benefits. Please see Restore Louisiana Homeowner Assistance Program Guidelines, Section B. Solution 2: Homeowner Managed Construction, ix: Solution 2 Manufactured Housing Unit Replacement. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that will provide additional details how the program may be able to help you repair or replace your damaged mobile home.

PRIME

COMMENT: Prime piggyback program: is it a grant, loan, or forgivable loan? Percentage? Who are the eligible applicants? Contractors/developers/govts/non-profits?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please



refer to the action plan amendment for details about the PRIME Program. PRIME Program guidelines will be included in the Notice of Funding Availability document once it is advertised.

IDA APA 1 LAKE CHARLES PUBLIC HEARING COMMENTS

IDA APA 1 LAKE CHARLES public hearing comments

GENERAL

COMMENT: If the flood was away material from under the home on the house has to be releval. Is this program the help you get this done?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: Please make this information easily available on a website. Not in a report but perhaps a series of fact sheets. Bear in mind our population struggles with literacy, they are elderly & lack the internet.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage all affected by disasters in 2020-2021 to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> as the first step in the process. The action plan, action plan amendment, program guidelines and resource documents are on the same website and that detail how the program may be able to help those affected repair their home. The Restore Louisiana program survey has the functionality that it can be read to those with eyesight or other reading disabilities. Should assistance be required to understand or obtain clarification related to any information in the program manual, applicants may contact the program by calling the call center at 866-735-2001. Program representatives will provide support to explain program requirements for which an applicant needs further information. Additionally, the website has a series of FAQ (fact sheets as requested) along with video clips explaining specific steps throughout the program (i.e. How to complete an application).

COMMENT: Please make the V-zone information easily available.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Detailed information from FEMA regarding V Zones can be found at [Zone V | FEMA.gov](#).

COMMENT: How will you address leadership (?) concerns? Please apply the same rules for both Ida & Laura.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There is only one Restore Louisiana Homeowner Assistance Program for Hurricanes Laura, Delta, Ida and May 2021 Severe Storms administered by the state of Louisiana.

COMMENT: I think this is a great step to help us here in Lake Charles & Moss Bluff, LA. As for me and my family, my mother's house is destroyed. She had no insurance and is 81 years old this year. Her income is less than \$1600 per month. Myself... I still have a lot of property damage. Can my SBA loan be forgiven or reduced? I had to get the SBA loan because FEMA wouldn't help enough. This will be an extreme burden. It would be so helpful to not stress and feel like it will never end. The tress that fell into my property is not a very serious fire hazard. Not only the ones that were mine and mostly cleared.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. SBA funds provided for repair, reconstruction or elevation can be used in conjunction with program funds, if you are eligible for the Restore Louisiana Homeowner Assistance Program. Please review the program manual, section G. Duplication of Benefits, section iii. SBA for detailed information, and section H for sample award calculations at the following link. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the resource documents on the same website that detail how the Program may be able to help you repair your home. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: What is the average medium income in the country club & weaver (?) area?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. HUD's posted income limits for 2022 are available here: <https://www.hudexchange.info/resource/5334/cdbg-income->



[limits/](#). We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: Please—will we be helped with removal of obviously rotted trees from Laura & Delta? I have trees that were damaged and yes leaning down trees in my yard. Please help—trees that will cause more damage, limbs fell Sunday during the storms.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: If you can get money to remove trees that were uprooted and hanging on other trees that could possibly fall on the house or barn and cause more damage?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: Please consider help with clearance of excessive amounts of trees down on private property with possible fire hazard disaster, since this excessive line of trees down are near Gulf States on Entergy Big wire lines and gas pipe lines. For your estimation (?) purposes—the line of trees runs about 3 acres long—between Pear St. and Booker St.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There are no programs that include reimbursement for tree or debris removal on private property.

COMMENT: Parts of Calcasieu Parish and the secondary areas prohibit creative housing – studios, tiny homes, etc. Are there housing options include those? How will local barriers (?) be overcome?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Your local

parish government has jurisdiction over local land use ordinances that may prohibit certain building types. The Restore Louisiana Homeowner Assistance Program Solution 2 allows for the homeowner to pick their own plans for reconstruction. Stick-built reconstruction plans must be approved by the homeowner's jurisdiction prior to building and specific permits must be applied for too. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: What part of these programs can be used by the cities/town/parishes to address drainage issues? Poorly maintained drainage is a large contributor to urban and suburban flooding.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Some drainage projects may be eligible for funding with the proposed Resilient Communities Infrastructure Program. The program policy will be available on the Restore Louisiana website once the program is launched.

COMMENT: The city of Lake Charles often prioritizes parts of town that are not low/medium income. How will OCD ensure that these programs benefit parts of town that have not historically been invested in?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program designed survey questions to help us phase applicants so that we may prioritize assistance for the most vulnerable as per HUD requirements. The proposed Resilient Communities Infrastructure Program and Hometown Revitalization Program also require that projects benefit low and moderate income areas. The program policies will be available on the Restore Louisiana website once the programs are launched.

COMMENT:

1. Lack of communication and notification of ALL persons affected in parishes from Beauregard, or Vernon or Allen or Jeff Davis. Calcasieu wasn't the only one damaged.
2. Why does FEMA keep rejecting us no matter how we corrected it still gets rejected?
3. How do I get to the correct departments or resources I was caught without insurance prior to the storms and suffered structural damages.
4. Helping to clear excessive brush and trees and foliage to reduce potential fire and flooding hazards.



5. Will an inspector come out to physically inspect the property and/or advise you which direction you may proceed or which agencies you may utilize?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. To address your concerns please see responses below:

1. Lack of communication and notification of ALL persons affected in parishes from Beauregard, or Vernon or Allen or Jeff Davis. Calcasieu wasn't the only one damaged.
 - a. Please refer to the Restore LA Program website at <https://restore.la.gov/> for a list and map of all eligible areas as listed in the HUD Federal Register Notice. **We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program. All potential eligible applicants for the Restore Program will be contacted using information they provided to FEMA as FEMA registration is a requirement for the Restore Louisiana Homeowner Assistance Program. Additionally, the state will conduct additional outreach events in multiple areas in the coming months as the program ramps up to reach residents in low-income areas where survey responses are low.**
2. Why does FEMA keep rejecting us no matter how we corrected it still gets rejected?
 - a. **Please contact FEMA at 1-800-621-3362 for FEMA questions.**
3. How do I get to the correct departments or resources I was caught without insurance prior to the storms and suffered structural damages.
 - a. **Lack of insurance is a criteria for phasing to help the most vulnerable populations recover in the Restore Louisiana Homeowner Assistance Program. Please review the Program guidelines on our website <https://restore.la.gov/> for detailed information.**
4. Helping to clear excessive brush and trees and foliage to reduce potential fire and flooding hazards.
 - a. **There are no programs that include reimbursement for tree or debris removal on private property.**
5. Will an inspector come out to physically inspect the property and/or advise you which direction you may proceed or which agencies you may utilize?
 - a. As part of the Restore Louisiana Homeowner Assistance Program, the state will conduct a damage assessment after you have been invited to and submit your application in order to calculate your award. Solution 1, if chosen, also provides for State assigned contractors to complete an inspection of the project after grant execution. If Solution 2 is chosen, you will be responsible for requesting your LA Licensed contractor to provide you with a scope of work (SOW) for your



repairs. All Program work completed must meet your local jurisdictions' code requirements. All permits must be closed by the jurisdiction and items identified on the program's scope of work must be verified as completed in adherence to program standards prior to final payment being made. We strongly encourage you to fill out a survey, the first step in the process for the Restore Louisiana Homeowner Assistance Program, at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: Have money allocated to the city entities appropriated to improve drainage and maintenance of areas that flood and (they are not considering it to be a flood zone) for future disaster purposes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Some drainage projects may be eligible for funding with the proposed Resilient Communities Infrastructure Program. These HUD funds cannot be used to pay for maintenance. The program policy will be available on the Restore Louisiana website once the program is launched.

COMMENT: My house was gutted and permit office said that the house must be rewired. Does this assist with rewiring? That is one reason I am still not back into the home. Who will appraise home for buy-out? Will HUD repair if parish elevates the home via a mitigation grant?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. As part of the Restore Louisiana Homeowner Assistance Program, after you have been invited to and submit your application, the state will conduct a damage assessment in order to calculate your award. Requirements received in writing from your jurisdiction may be eligible scope items included in your grant award. All program work completed must meet your local jurisdiction's code requirements. All permits must be closed by the jurisdiction and items identified on the program's scope of work must be verified as completed to program standards prior to final payment being made. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: My home flood due to the city not keeping the drains cleaned out.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

FEMA

COMMENT: I have tried to get help from FEMA with no success. I have a disabled son that is trying to get a kidney. My home has no running water because of broken water line. (?) I had my gas meter taken because of a bad gas line so me and my son and his children are living with no gas, no water or hot water. I need help now. I've sent photos to FEMA got contact with no success. Can I please get some help? We also applied for a FEMA trailer and didn't get one.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. Please contact FEMA at 1-800-621-3362 for FEMA questions. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I inquired FEMA about FEMA trailer purchase. Who is in charge? What do I need to do? Requirements, process, terms, conditions and money.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions.

COMMENT: They never came out to the house for Laura nor Delta. My dad is disabled, lots of damage has been done. He shouldn't even be living in the house because of mold damage.



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: FEMA didn't assess damages to homes to know the severity of damages. Rental assistance needed was not offered to all residents. The wait that it took to receive response. If you experience contractor fraud do you still qualify?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. If you experienced contractor fraud, please see the FAQ section on our website. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents, including FAQ's on the same website that detail how the program may be able to help you repair your home.

COMMENT: Is FEMA a part of HUD?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. FEMA and HUD are separate federal agencies. FEMA is part of the U.S. Department of Homeland Security (DHS) and HUD is the U.S. Department of Housing and Urban Development (HUD).

COMMENT: I did not go to FEMA. Can I still get a number from FEMA?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions.



COMMENT: I never received an invite for phase 1 in an area well below poverty level needs an application. Live outside city limits, FEMA never came to residence to verify damage.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions and to inquire about your inspection. Phase 1 is part of the Restore Louisiana Homeowner Assistance Program. If you submitted a Restore Louisiana Homeowner Assistance Program survey you will be contacted when it's time for you to complete an application. The Restore Louisiana Homeowner Assistance Program designed survey questions to help us phase applicants so that we may prioritize assistance for the most vulnerable as per HUD requirements. After these needs are met and as funding allows, the Program will open to additional phases. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home as well as how surveys are phased.

COMMENT: Can you qualify if FEMA denied claim? Repairs have been 80-90% done how do I qualify for this program if insurance doesn't cover repairs 100%?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The \$25,000 or more in insurance proceeds question helps us phase applicants so that we may prioritize assistance for the most vulnerable as per HUD requirements. After these needs are met, and as funding allows, the Program will open to additional phases. If your insurance does not cover all of your repair expenses, the Program may still be able to provide assistance if your insurance limits were met. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: FEMA did not come to my assistance because I have homeowners insurance. The outside of my home is still damaged because the insurance are not covering it.

OCD RESPONSE Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. To serve



the most vulnerable populations most effectively in our state, the program’s phased approach, which is aligned with federal guidance, ensures that the most vulnerable populations are prioritized for assistance. If your insurance does not cover all of your repair expenses, the program may still be able to help. You will be required to work with your insurance company first to ensure any coverage maintained is claimed through the carrier and to ensure there is no duplication of coverage. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: If you did not seek help from FEMA, can you still take advantage of these programs?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home and it gives details regarding program requirements.

COMMENT: I have applied many times & gave much info to FEMA. Please help. My roof leaks bad. I am disabled and live on S.S. 1000 monthly. Please call me ASA. Beauregard Parish.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: This has been very interesting. FEMA did not visit my house but profited \$14K to make repairs. They did not come in but after Laura & Delta then Ida the house used money and the home roof was damaged more with the roof it started leaking after Delta & other storms then it needed more rehab. How can you help us? The home is not inhabitable. We are living with other family. Help us! We need a home!

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I wasn't awarded enough from FEMA to clear my land, buy something else—move it to my land and put a new septic system. My issue is now the parish is going to fine me and possibly put a lean on my property because I can't demo the old mobile home. I tried to appeal with FEMA my package was sent back for not correct postage so FEMA says it's invalid because it was 6 days late—even though I took pics of the package with an itemized list & receipts showing where all the funding went. So what do I do now? I'm low income and can't afford demo.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: FEMA did not come in the homes to see inside damage and so we were not accounted for on the severe damage list. All the inspectors did was walk around the houses and take only side pictures.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. . Please contact FEMA at 1-800-621-3362 for FEMA questions and to request an additional interior inspection. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.



COMMENT: What criteria does FEMA use to determine damage or total loss? If FEMA says it's damaged but it's really a total loss, how do I get a re-inspection? How do I get a FEMA trailer?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions and your local parish permitting office to inquire if your home should receive a substantial damage letter. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I just did the roof replacement in the past 10 days. I got a small amount of money from FEMA—spent twice that just on the roof—still need ceilings, walls and floors repaired. Double wide mobile home 1980 model.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you replace your manufactured home.

COMMENT: I received an \$8,000 allocation for flooding (Ida) and was told that I must provide proof of flood insurance. My house was totaled and had to be gutted in its entirety. I had to acquire an elevation certificate for \$500 and submitted it to liberty mutual and cannot get a quote for flood insurance. I have had to use the funding for other home matters. FEMA stated that if I don't get the flood insurance, I must repay the funds. I am still out of my home and cannot afford to repay the \$8,000 is there a payment plan? Will it interfere with HUD assistance? I have proof that I tried to acquire the flood insurance.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact



the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We also strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home. If the property previously received federal disaster assistance, it is required that flood insurance be maintained on the property in perpetuity. Without compliance with these regulations the damaged structure would be ineligible future federal disaster program funding.

HOMEOWNER

COMMENT: My restore la # is XXXXXX. I need to fill out application number with a person as I'm not familiar with email or electronics (?). I have found out I have cancer since the hurricane (Laura), I'm worried that time will expire before I die or get sicker and it leave my wife stranded. Please help me.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Individual provided personal contact information. OCD has contacted the applicant directly to provide additional resource information and answer questions regarding relevant programs.

COMMENT: Need help to repair my damaged home Hurricanes Laura & Delta.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: If I don't fall into the low/med income limits will there be partial assistance?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. To serve the most vulnerable populations most effectively in our state, the program's phased approach, which is aligned with federal guidance, ensures that the most vulnerable populations are prioritized for assistance. After these needs are met, and as funding allows, the Program will open to additional phases. We also strongly encourage



you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: We live in Calcasieu parish on the outskirts of the city. Our home was destroyed and torn down. Land is cleared but we need permission to build a studio out of a container we already purchased.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you reconstruct your home.

COMMENT: Will your company be hiring local people to go around and get surveys?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. As soon as OCD and HUD have executed the grant agreement and the state has access to funds, we intend to expand our outreach efforts to reach every eligible homeowner.

COMMENT: I have filled out restore.la on 3/31/21. I've not received word, email or anything. So I went to another meeting 4/17/22 and they told me to refile so I did. I called them yesterday and asked them why have not heard from them. I asked what is the status of my case? They didn't know. All I want to know is will they get in touch and received help. My income is S.S. \$15,125 annually. If they don't give me an application by August 25, 2022 will I be eligible to get help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. To serve the most vulnerable populations most effectively in our state, the program's phased approach, which is aligned with federal guidance, ensures that the most vulnerable populations are prioritized for assistance. After the needs of each phase are met and as funding allows the Program will open to additional phases. There is currently no deadline in place for submitting a survey or application. We strongly encourage you to visit our website for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> and review the available resource documents on the website that detail phasing and how the program may be able to help you repair your home.



COMMENT: How do I find what phase I'm in? My husband is disabled, can the home be rebuilt to fit his disabilities?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. To serve the most vulnerable populations most effectively in our state, the program's phased approach, which is aligned with federal guidance, ensures that the most vulnerable populations are prioritized for assistance. Invitations to complete an application are sent in batches by phase and you will be notified when you are invited. After the needs of each phase are met and as funding allows the program will open to additional phases. There is the opportunity to request ADA compliant repairs in the program application. We strongly encourage you to visit our website for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> and review the available resource documents on the website that detail phasing and how the program may be able to help you repair or reconstruct your home.

COMMENT: Grandparents are deceased, I lived with them at the time of death. Their others, heir property. What can I do to get help? Heir have given me okay to stay there, house was damaged and has caught on fire since the floods. Can I get help? They all have their own homes.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Homeowners program requires that you owned and occupied the damaged property at the time of the disaster event and remain the owner of the property through the programs' final inspection, however, there are special circumstances related to ownership as outlined in the program manual in section A. Applicant Eligibility Criteria, i. Ownership, c. Special Circumstances Related to Type of Ownership. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: I call the 866-735-2001 because I could not log on to fill my application. She fill it out for me but she said she could not complete it that I needed to sign it, how do I do that?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. **Individual**



provided personal contact information. OCD has contacted the applicant directly to provide additional resource information and answer questions regarding program application submission.

COMMENT: If you had a mobile home, can you assist with building a home? Or do you have to put another trailer home?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Mobile homeowners have the choice via the Solution 2 program to rebuild with a stick-built home up to the grant award amount (Mobile Home allotment minus Duplication of Benefits) as outlined in the program manuals, Section VIII. Program Solutions, B. Solution 2 Homeowner Managed Construction, ix. Solution 2 Manufactured Housing Unit Replacement, b. MHU to Stick-built Replacement. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website as well as the program guidelines that detail how the program may be able to help you replace your home.

COMMENT: If FEMA turn you down because you have homeowner insurance but your insurance company went bankrupt (lighthouse) how can you prove you didn't get enough money if they no longer servicing companies or customers?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions and to advise FEMA of the change in your insurance coverage status. If your insurance company went bankrupt and did not pay out your claim, the Program may be able to assist you. Keep all communications from your insurance company regarding your claim, including any payments made or defaulted. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: What if your home was damaged and you purchase a new home, will you get some reimbursements?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The



Restore Louisiana Homeowner Assistance Program requires that you owned and occupied the damaged property at the time of the disaster event and remain the owner of the property through the programs' final inspection. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home.

COMMENT: Totaled completely demo because there was a part of home that was totaled ripped off. Will I need receipts? Everything was destroyed, papers were destroyed.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Gather and keep pictures of the damaged dwelling and the demo process that may be required to demonstrate damage. Also, if you received a substantial damage letter from your local jurisdiction, you will need to provide it to the Program. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you reconstruct your home as well as reconstruction requirements.

COMMENT: We are just trying to get back in our home it's been all the same FEMA did not for us it was it was pennies and that's why people in L.C. are still struggling. I will be glad for anything please just help us.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 5 to inquire about available programs that may be able to help you with temporary housing. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.

COMMENT: How can you find out what criteria you have to meet for each individual phase?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We



strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home as well as program survey phasing criteria.

COMMENT: Do you have to “not” have a mortgage? Can you have both homeowners and small business grants? If insurance have paid for their percentage and I have paid funds am I reimbursed? Does SBA loans stop you from this grant?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the available resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home as well as program criteria details, solutions available for repairs, reconstruction and reimbursement as well as SBA duplication of benefits information and award calculation examples.

COMMENT: Proof of all receipts of items purchased. Contracts-License/contact information if you use your own contractor. List of all items for repair, cost. List of lost items. It’s easier if you already have the contractor through your program.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The state will conduct a damage assessment in order to calculate your repair and/or reimbursement award, we do not collect receipts nor does the program pay for the replacement of personal items/contents. Solution 1 contractors are assigned by the state and the assigned contractor will also complete an inspection of the project after grant execution. All program work completed must meet your local jurisdictions’ code requirements. All permits must be closed by the jurisdiction and items identified on the program’s scope of work must be verified as completed to program standards prior to final payment being made to the Solution 1 contractor. The program’s contractors provide a one-year warranty on workmanship too. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home.



COMMENT :My house is not complete I ran out of money from SBA and cannot finish my house. I am currently staying with a friend.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the Program may be able to help you repair your home.

COMMENT: In the buyout program, will my land be included in that price of the sale.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the Solution 4 Buyout Program may be able to help you move to higher ground out of harm's way. In general, the buyout program includes the buyout of the home and land on which it stands. If the damaged home is on a large parcel of land, it may be considered on a case by case basis.

CASE MANAGEMENT

COMMENT: I was damaged by both hurricanes. Retired. Low income and living in a FEMA trailer and can't get help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the Program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. You may also contact the call center at 866.735.2001 to get help accessing the survey or completing the survey questions.



COMMENT: My husband and I are still living in our camper due to Hurricane Laura. It is very hard to move around inside due to his stroke. I applied for FEMA after Hurricane Laura & submitted every document they requested and now I have been ordered to pay back the money for renter's assistance. I was told by FEMA rep to apply for it at the time. I have submitted to my insurance company "southern Fidelity" & now they are filing bankruptcy on July 15, 2022. I owe my electrician, A/C, & cabinet company a total of \$11,500. I have no funds to pay any but partial payment to FEMA & cabinet co. I'm still living in camper. Need phone. Help ASAP. I did the online survey also.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions and to give them an update on the status of your insolvent insurance company. Check the email address you provided on your survey regularly for your invitation to submit your application to the Restore Louisiana Homeowner Assistance Program. Also, if you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 5 to inquire about available programs that may be able to help you with temporary housing.

COMMENT: Elder lady (96) had to be put in a nursing home. Can she go phase 4 buy out without nursing home receiving all the money. Does the home receive benefit of the loss?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. The Restore Louisiana Homeowner Assistance Program requires that you owned and occupied the damaged property at the time of the disaster event and remain the owner of the property through the program's final inspection. However, there are special circumstances related to ownership as outlined in the program manual in section A. Applicant Eligibility Criteria, i. Ownership, c. Special Circumstances Related to Type of Ownership. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair your home. The Solution 4 Buyout program is for properties designated as being located in a floodway.

COMMENT: I just need help.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development



will include your comment and our response when we submit the plan to HUD for federal approval. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. You may also contact the call center at 866.735.2001 to get help accessing the survey or completing the survey questions.

COMMENT: No insurance. Disability. ID # XXXXXXXX. FEMA was unfair about the damage, only looked outside; not inside, my shop & building for rent storage & my fence destroyed my ceilings are cracked, broken tiles, water spots in house, paint is off my home. The 3 of us have low income disabilities diabetics 2 have heart problems & diabetic aged 75, 73, 67. FEMA barely covered my roof. Not insured, had to make choice between meds to live or home insurance.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. Please contact FEMA at 1-800-621-3362 for FEMA questions. If you need immediate rental assistance, please contact the Louisiana Housing Commission at 888.454.2001 to inquire about available programs that may be able to help you with temporary housing. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. You may also contact the call center at 866.735.2001 to get help accessing the survey or completing the survey questions.

RENTAL/RENTAL ASSISTANCE

COMMENT: I have a rental property heavily damaged that was being rented by my son. I have heard that rental can be applicable as an extension of the home. Is that so?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. You may also contact the call center at 866.735.2001 to get help accessing the survey or completing the survey questions. In addition, the proposed action plan includes The Neighborhood Landlord Rental Program. The Neighborhood Landlord Rental Program



will offer funding for landlords to rehabilitate existing rental housing units or construct new affordable rental housing units.

COMMENT: As a renter, will you provide a list of families (?) to rent to?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. There is a housing locator service that can be accessed <https://www.lahousingsearch.org/>.

COMMENT: 6.28.22 Liz Carnier, PO Box 5, DeQuincy, LA. If I own land can I qualify for the landlord program? How would I go about building housing for low income families and for how long? What is the limit that you can build?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The proposed action plan includes The Neighborhood Landlord Rental Program. The Neighborhood Landlord Rental Program will offer funding for landlords to rehabilitate existing rental housing units or construct new affordable rental housing units. More information about the program will be posted on the Restore Louisiana website.

COMMENT: What constitutes affordable rent? 30% of monthly income? 25% of monthly income @ \$8 per sq ft (?) that's ~\$300 a month. Please keep those rates how can you what is your plan?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. HUD has specific information posted on its website detailing Area Median Incomes (AMI) and the established HUD rents limits for each parish and AMI tier (please see <https://www.hudexchange.info/programs/home/home-income-limits/>).

COMMENT: What if you are under income level and rent is above say \$600/month. Is the applicant able to receive the difference? Assistance in rent already paid?

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. For HUD rent limits for each parish and AMI tier, please see <https://www.hudexchange.info/programs/home/home-income-limits/>.

COMMENT: If you have rental property is there any program that can help me?



OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Neighborhood Landlord Rental Program will offer funding for landlords to rehabilitate existing rental housing units or construct new affordable rental housing units.

SBA

COMMENT: Is there any money to help people who got SBA loans to repay them? I am a senior that has 2 SBA loans that we need help to repay or get forgiven. We got a loan in 2018 and had to redo our house because of Laura so we got another loan in 2021 and FEMA wouldn't help us because we qualified for SBA. So we have 2 loans. We are seniors. 71 and 67 years old. We don't have a mortgage.

OCD RESPONSE: Thank you for your comment on the proposed action plan amendment for recovery from Hurricanes Laura, Delta, Ida and the May 2021 Severe Storms. The Louisiana Office of Community Development will include your comment and our response when we submit the plan to HUD for federal approval. SBA funds provided for repair, reconstruction or elevation can be used in conjunction with the Restore Louisiana Homeowner Assistance program funds, if you are program eligible. Please review the program manual section G. Duplication of Benefits, section iii. SBA for detailed information and section H for sample award calculations.. We strongly encourage you to fill out a survey for the Restore Louisiana Homeowner Assistance Program at <https://restore.la.gov/> if you have not already done so and review the program guidelines and resource documents on the same website that detail how the program may be able to help you repair or reconstruct your home. You may also contact the call center at 866.735.2001 to get help accessing the survey or completing the survey questions.

SECTION 2

AMENDMENT TO BUDGET FOR HURRICANES LAURA AND DELTA RECOVERY PROGRAMS BASED ON MARCH 2022 ALLOCATION OF \$450 MILLION

Program Budget

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

Stakeholders and community members were made aware of the revised funding allocation during the public comment period for the Hurricanes Laura and Delta Action Plan. Further, the state will continue to inform the public about the revised funding allocation during the public comment period for the Hurricane Ida and May 2021 Floods Action Plan.

With the additional allocation of \$450 million for Hurricanes Laura and Delta, the adjusted HUD-identified MID areas are as follows: Acadia (70526, 70578), Allen, Beauregard, Caddo, Calcasieu, Cameron, Jefferson Davis, Lafayette, Natchitoches, Ouachita, Rapides, St. Landry (70570), St. Martin (70517), Vermilion (70510), and Vernon (71446).

In original action plan submitted, the Resilient and Mixed Income Piggyback Program (PRIME) description had a maximum award of \$10 million for Hurricanes Laura and Delta. This amendment will increase the maximum award for this program to \$15 million to be consistent with the PRIME program for Hurricane Ida and the May 2021 Floods.

Total Allocation: \$1.05 Billion

Light Gray Text: First Allocation of \$600M

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



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
HOUSING	Rehab	\$272,298,226.00 \$250,000,000.00	\$217,838,580.80 \$200,000,000.00	\$54,459,649.20 \$50,000,000.00	45% 24%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Buyout	\$20,000,000.00 \$10,000,000.00	\$16,000,000.00 \$8,000,000.00	\$4,000,000.00 \$2,000,000.00	3% 1%	\$250,000.00	Low- and moderate-income or Urgent Need	0
	New Construction	\$90,000,000.00 \$456,078,744.00	\$72,000,000.00 \$364,862,995.20	\$18,000,000.00 \$91,215,749.80	15% 43%	\$300,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$3,500,000.00 \$6,500,000.00	\$2,800,000.00 \$5,200,000.00	\$700,000.00 \$1,300,000.00	1% 1%	\$0.00	Low- and moderate-income or Urgent Need	0
ECONOMIC REVITALIZATION	Workforce Training	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Business Grants	\$5,100,000.00 \$50,455,482.00	\$4,080,000.00 \$40,364,385.60	\$1,020,000.00 \$10,091,096.40	1% 5%	\$150,000.00	Low- and moderate-income or Urgent Need	0
	Other	\$0.00 \$50,000,000.00	\$0.00 \$50,000,000.00	\$0.00 \$0.00	0% 5%	\$0.00	Low- and moderate-income; Urgent Need or Slum and Blight	0
INFRASTRUCTURE	Water/sewer Improvements	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Health Facilities	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Other	\$185,232,774.00 \$185,232,774.00	\$148,186,219.20 \$158,186,219.20	\$37,046,554.80 \$27,046,554.80	31% 13%	\$28,000,000.00	Low- and moderate-income; Urgent Need or Slum and Blight	0
PUBLIC SERVICES	Legal Services	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
	Housing Counseling	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0



	PROGRAM	BUDGET	HUD IDENTIFIED MID BUDGET	GRANTEE IDENTIFIED MID BUDGET	% OF ALLOCATION	MAXIMUM AWARD	NATIONAL OBJECTIVE	ESTIMATED OUTCOME
	Other	\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00	0% 0%	\$0.00	0	0
ADMIN	Admin	\$23,900,000.00 \$41,900,000.00	\$19,120,000.00 \$33,520,000.00	\$4,780,000.00 \$8,380,000.00	4% 4%	\$0.00	Low- and moderate-income or Urgent Need	0
PLANNING	Planning	\$100,000.00 \$100,000.00	\$80,000.00 \$80,000.00	\$20,000.00 \$20,000.00	0% 0%	\$0.00	Low- and moderate-income or Urgent Need	0
TOTAL		\$600,131,000.00 \$1,050,267,000.00	\$480,104,800.00 \$860,213,600.00	\$120,026,200. \$190,053,400.00				

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

Amended Proposed Allocation Amounts

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

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

This amendment includes funding for two additional programs for Hurricanes Laura and Delta recovery. The two new programs, the Hometown Revitalization Program and the Resilient Communities Infrastructure Program, both have a budget of \$50 million, respectively.



To fund the \$50 million Resilient Communities Infrastructure Program, the Nonfederal Share Match Program has a reduced budget to \$100 million. The overall budget allocation for infrastructure programming does not change. The total budget for economic revitalization programming increases by \$95,355,482, taking the total from \$5,100,000 million to \$100,455,482 million. This increases the budget for Small Business Loan & Grant Program to \$50,455,482 and adds the new program, Hometown Revitalization Program for \$50 million.

ECONOMIC REVITALIZATION: HOMETOWN REVITALIZATION PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$50,000,000	\$50,000,000	\$0.00

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricanes Laura and Delta.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

Program National Objective(s)

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

Meeting a need having a particular urgency (urgent need). Program Eligibility

Program Eligible Activities:

105(a) 1-25

Eligible Applicants:

Units of general local government (UGLG)



Program Responsible Entity

Subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

The program policies and procedures may include further project selections and priorities including, but not limited to:

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)

Uses of funds may include, but may not be limited to:

- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Façade improvements to private or public structures in commercial areas.



INFRASTRUCTURE: RESILIENT COMMUNITIES INFRASTRUCTURE PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$50,000,000.00	\$50,000,000.00	\$0.00

Narratives

Program Description

The state will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Ida and/or the May 2021 Severe Storms.

Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

Program Tieback to Disaster/Unmet Needs

This program addresses the unmet needs for business growth and recovery located in eligible MID areas. Documentation of impacts from the disasters will be required to be considered eligible for assistance.

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

Each eligible activity application will be required to describe sustainable practices focusing on reducing runoff and improving water quality, including mitigation of future flood risk.

How Will Program Advance Long-Term Resilience

The program will require mitigation components to be included within the scope(s) of awarded projects in order to advance long-term resilience.

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

Program National Objective(s)

- Benefit to low- and moderate-income persons or households
- Elimination of slums and blight



Program Eligibility

Program Eligible Activities:

105(a) 1-5, 7-9, 11-12, 16

Eligible Applicants:

Units of general local government (UGLG)

Program Responsible Entity

The state of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award amount is \$20,000,000.

Once the allocation method and criteria are identified, a substantial amendment will be submitted to further describe the program.

Program Competitive Application Overview (if applicable)

Program Method of Distribution Description/Overview (if applicable)

Program Estimated Begin and End Dates

The state estimates the being and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

The program policies and procedures may include further project selections and priorities including, but not limited to:

- Most impacted and distressed areas
- Low-Income area populations
- Underserved communities that were economically distressed prior to the events (i.e. Opportunity Zones, Promise Zones, Neighborhood Revitalization Strategy Areas, tribal areas etc.)



INFRASTRUCTURE: NONFEDERAL SHARE MATCH PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$100,000,000.00	\$80,000,000.00	\$20,000,000.00

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

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

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

How Will Program Advance Long-Term Resilience

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

Program National Objective(s)

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



Each project worksheet will be reviewed to determine national objective. As discussed in the infrastructure unmet needs, some projects within the Public Assistance program will have had a particular urgency, including existing conditions posing a serious and immediate threat to the health and welfare of the community.

Program Eligibility

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

Program Responsible Entity

State of Louisiana or its subrecipient(s)

Program Maximum Assistance

The maximum award is \$15,000,000.00

Program Competitive Application Overview (if applicable)

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

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 – July 31, 2028

Other Program Details

Eligible Applicants include, but are not limited to, the following entities:

- Parish and municipal governments
- State agencies and authorities
- Schools (K-12) and Universities
- First responders

- Critical infrastructure facilities as defined by FEMA (wastewater and drinking facilities)
- Public Housing Authorities

Other parish and local program applicants eligible to receive federal recovery funds, including eligible private non-profit organizations.

The program policies and procedures may include further project selections and priorities due to funding availability including, but not limited to:

- Most Impacted
- Low-Income Area populations and underserved communities
- Geographical considerations

ECONOMIC REVITALIZATION: SMALL BUSINESS LOAN AND GRANT PROGRAM

GRANT TYPE	GRANT NUMBER	PROPOSED BUDGET	PROPOSED MID THRESHOLD BUDGET HUD IDENTIFIED	PROPOSED MID THRESHOLD BUDGET GRANTEE IDENTIFIED
	B-21-DZ-22-0001	\$50,455,482.00	\$40,364,385.60	\$10,091,096.40

Narratives

Program Description

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

Program Tieback to Disaster/Unmet Needs

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

Program National Objective(s)

- Low Mod Job Creation or Retention Activities
- Low Mod Area Benefit



- Low Mod Limited Clientele

Program Eligibility

Program Eligible Activities:

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

Eligible Applicants:

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

Program Responsible Entity

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

Program Maximum Assistance

The program will provide standard awards of a maximum of \$100,000, with exceptions allowing for up to a maximum award of \$250,000.

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

Program Competitive Application Overview (if applicable)

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

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

Program Method of Distribution Description/Overview (if applicable)

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

Program Estimated Begin and End Dates

The state estimates the start and end dates will be August 1, 2022 - July 31, 2028

Other Program Details

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

Ineligible Activities

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

SBA Declined Loans

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

Criteria for Selection:

The Program will prioritize assistance to businesses that:

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