

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

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

LOUISIANA OFFICE OF COMMUNITY DEVELOPMENT/DISASTER RECOVERY UNIT

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

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Executive Summary

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

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

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

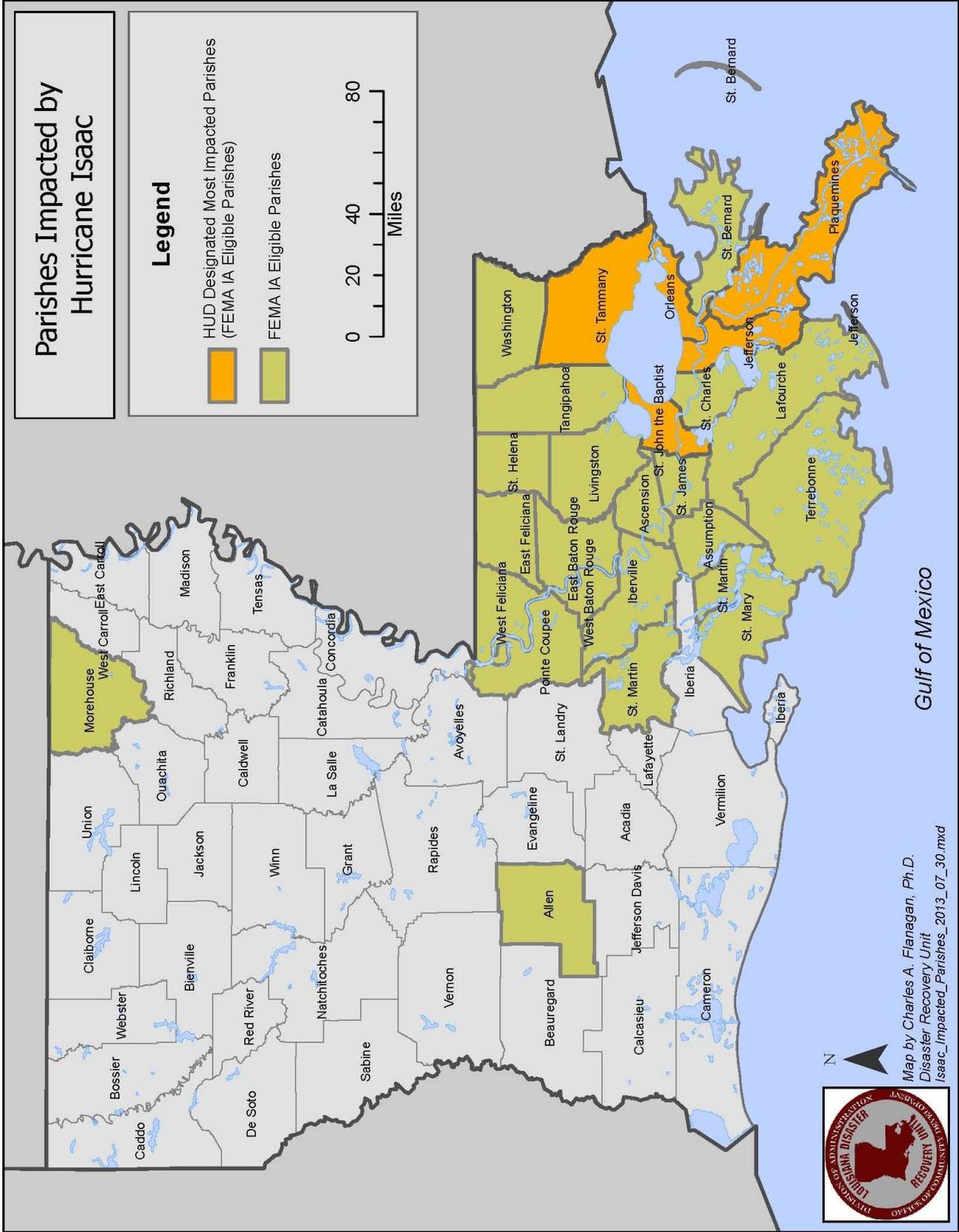
Additionally, storm surge from Lake Pontchartrain caused significant flooding in the southern portions of **St. Tammany, Tangipahoa** and **Livingston** parishes, particularly in the City of Slidell in St. Tammany, as well as the Lake Catherine area of **Orleans Parish**. Isaac's winds and rain battered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

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

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

The State of Louisiana is the recipient of the remaining \$66,398,000 of the funds but intends to transfer an additional \$2,019,000 to St. Tammany Parish to be managed as part of their direct allocation, reducing the state's total grant to \$64,379,000. Governor Bobby Jindal has designated the state Office of Community Development/Disaster Recovery Unit (OCD/DRU) as the administering agency for these recovery funds.

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



I. Impact and Unmet Needs Assessment

A. Background

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

B. Housing

1. Statewide Housing Assessment

a. Owner and Renter Occupied Damages

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

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

Table 1: HUD-Defined Levels of Damage

| Type | Definition |
|------------|---|
| Minor-Low | <i>Less than \$3,000 of FEMA-inspected real property damage</i> |
| Minor-High | <i>\$3,000 to \$7,999 of FEMA-inspected real property damage</i> |
| Major-Low | <i>\$8,000 to \$14,999 of FEMA-inspected real property damage</i> |
| Major-High | <i>\$15,000 to \$28,800 of FEMA-inspected real property damage and/or 4'-6' flooding on the first floor</i> |
| Severe | <i>Greater than \$28,800 of FEMA-inspected real property damage or determined destroyed and/or 6' or more flooding on the first floor</i> |

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

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

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

Source: FEMA IA, April 2013

*LMI calculation based on respective statistical area of damaged address

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

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

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

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

Source: FEMA IA, April 2013

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

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

Table 4: FEMA Levels of Rental Damages

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

Source: FEMA IA

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

Table 5: Levels of Damage for Renter Households

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

Source: FEMA IA, April 2013

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

Table 6: SBA Home Loans for Renters

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

Source: SBA, May 2013

Concurrently, lessors of residential units represented a high proportion of SBA disaster business loans approved following Isaac. Combined with the above SBA Home Loan data, these two indicators illustrate both demand-side impacts to the rental population as well as supply-side impacts to rental property owners, which are described in greater detail in this assessment's discussion of economic damages and resulting unmet needs.

b. Impact on Public Housing Authorities

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

- The Jefferson Parish Housing Authority reported that 169 of its 200 units sustained some level of damage. Preliminary reports estimate the damages to be upwards of \$250,000, the majority of which will not be covered by either insurance or other sources of funds. The state will encourage Jefferson Parish to coordinate with the Jefferson Parish Housing Authority to determine if their CDBG-DR allocation is an appropriate source of funding for any outstanding needs.
- The St. John the Baptist Parish Housing Authority reported that 124 of its 296 units sustained damage. While the severity of the damage varied, some units were substantially damaged and will require complete reconstruction in order to return them to a habitable condition. In addition, the St. John PHA reported that two of its four administration buildings were damaged. The PHA expects to receive both insurance proceeds and FEMA assistance; however, in the event that unmet needs are identified, they may be addressed.
- The Donaldsonville Housing Authority (located in Ascension Parish) and the Lafourche Parish Housing Authority both reported damages to their units. However, the exact extent of the damages is not yet known. Both PHAs have also indicated that they are working with FEMA to obtain funding that will be used to address the Isaac-related issues. Once all damage assessments have been completed, if unmet needs are identified, they may be addressed.

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

2. St. John the Baptist Parish

a. Pre-Isaac Conditions and Trends

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

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

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

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

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

Combined, 2010 Census data and HUD’s pre-damage assessment suggest evolving demographic conditions in St. John the Baptist Parish, irrespective of Hurricane Isaac’s impact. Specifically, a low single-family home vacancy rate, combined with declining existing home

sales, new housing starts and overall population suggests an owner-occupied housing market at or near equilibrium, especially considering St. John the Baptist is one of the few parishes in southeastern Louisiana experiencing population outflow. This outflow is primarily due to a return to pre-Katrina population levels after receiving a post-Katrina population increase. However, the current population estimates for 2012 are slightly lower than pre-Katrina levels. Given this status, there remains a decline in the rental vacancy rate with no additional rental stock, which further reinforces a shift in the parish’s overall housing market.

b. Damage Assessment

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

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

Source: FEMA IA, April 2013

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

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

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

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

Source: FEMA IA, April 2013

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

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

Source: FEMA IA, April 2013

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

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

Source: FEMA IA, April 2013

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

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

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

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

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

Source: FEMA IA, April 2013

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

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

Source: FEMA IA, April 2013

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

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

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

Source: FEMA IA, April 2013

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

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

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

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

Source: FEMA IA, April 2013

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

3. Plaquemines Parish

a. Pre-Isaac Conditions and Trends

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

Belle Chasse is the parish’s largest population center, with more than half of the parish’s total population residing there. This is an important factor to note in discussion of the parish, as Belle Chasse is located within the federal levee protection system developed. As such, while Plaquemines’ total population declined from 26,757 to 23,042 between the 2000 and 2010 Census counts, Belle Chasse’s population grew from 9,848 to 12,679 within the same period. In short, Plaquemines’ population has retreated north, where it may be better-suited to withstand major weather events. Because of that shift, Belle Chasse’s demographic profile undoubtedly skews parish-wide statistics. Belle Chasse’s median household income of more than \$66,700 significantly exceeds the median household income of the parish. To illustrate the contrast between Belle Chasse and the rest of the parish, Port Sulphur, Plaquemines’ next most populated CDP, has a median household income of more than \$27,400. (See *Attachment B: Demographic Breakdown of Plaquemines Parish and Comparison of Surrounding Areas.*) Furthermore, between the 2000 Census and 2010 Census, Plaquemines Parish experienced a

substantial increase in median household income, from more than \$38,100 in 2000 to more than \$54,700 in 2010. This increase suggests a more affluent population remaining in the parish following Hurricane Katrina, but one which is located predominantly in Belle Chasse. From the state’s perspective, this is a key factor to note, as much of Isaac’s damage was located outside of Belle Chasse. As such, the affected population may have less recovery capacity than parish-wide data suggests.

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

b. Damage Assessment

Table 15: Plaquemines Parish Demographics and Damage Summary

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

Source: FEMA IA, April 2013

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

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

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

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

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

| Type | # Damaged | Ave. RP FVL | Total RP FVL |
|----------------|--------------|--------------------|------------------------|
| Boat | 12 | \$13,680.85 | \$164,170.15 |
| Condo | 2 | \$8,265.80 | \$16,531.60 |
| House | 853 | \$24,206.99 | \$20,648,560.09 |
| Mobile Home | 1,740 | \$5,163.58 | \$8,984,631.52 |
| Other | 4 | \$12,442.91 | \$49,771.64 |
| Townhouse | 2 | \$519.49 | \$1,038.97 |
| Travel Trailer | 167 | \$3,467.16 | \$579,015.03 |
| Total | 2,780 | \$10,950.98 | \$30,443,719.00 |

Source: FEMA IA, April 2013

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

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

Source: FEMA IA, April 2013

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

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

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

Source: FEMA IA, April 2013

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

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

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

Source: FEMA IA, April 2013

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

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

Source: FEMA IA, April 2013

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

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

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

Source: FEMA IA, April 2013

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

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

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

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

Source: FEMA IA, April 2013

4. Housing Unmet Needs

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

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

| Damage Level | # Rec. SBA | Avg. RP FVL | Avg. SBA Award | Multiplier |
|--------------|------------|-------------|----------------|------------|
| Minor-Low | 1,629 | \$862.58 | \$19,465.81 | 22.57 |
| Minor-High | 245 | \$4,667.71 | \$33,268.16 | 7.13 |
| Major-Low | 179 | \$12,064.49 | \$63,402.79 | 5.26 |

| | | | | |
|--------------|--------------|-------------------|--------------------|-------------|
| Major-High | 466 | \$19,694.79 | \$74,430.47 | 3.78 |
| Severe | 171 | \$50,230.05 | \$130,869.01 | 2.61 |
| Total | 2,690 | \$8,355.16 | \$40,250.11 | 4.82 |

Source: FEMA IA, April 2013

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

Table 24: Real Property Damage Estimation

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

Source: FEMA IA, April 2013

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

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

Given that IA payouts and SBA loans are both intrinsically tied to the IA universe, no adjustment was made to the known quantities in these categories to determine total statewide unmet housing need, estimated to be in excess of \$914 million (see Table 25). However, it should be noted this estimation may be conservative, as it does not account for the impacted rental population. This gap is especially apparent in the state's assessment of Isaac's economic impact, as a large proportion of SBA Business Loans disbursed were to lessors of residential housing. As such, the state may choose to address rental needs through the demand-side needs enumerated through the demonstrated affected renter population, or from the supply-side needs described in the following section of this Action Plan.

Table 25: Unmet Housing Need Estimate (Statewide)

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

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

Table 26: Unmet Housing Need Estimate by Parish

| Parish | Est. Damage | Haz. Payout in IA | Adj. NFIP Payout | FEMA IA Assistance | SBA Home Loans | Unmet Need |
|----------------------|------------------------|-----------------------|-----------------------|------------------------|------------------------|----------------------|
| Allen | \$724,531 | \$0.00 | \$0 | (\$42,806) | \$0 | \$681,725 |
| Ascension | \$21,326,325 | (\$227,312) | (\$624,489) | (\$1,997,278) | (\$798,800) | \$17,678,446 |
| Assumption | \$12,227,751 | (\$49,911) | \$0 | (\$1,120,141) | (\$302,000) | \$10,755,699 |
| East Baton Rouge | \$18,852,976 | (\$260,773) | (\$33,033) | (\$2,140,813) | (\$540,100) | \$15,878,257 |
| East Feliciana | \$3,440,072 | (\$104,750) | \$0 | (\$321,464) | (\$258,200) | \$2,755,657 |
| Iberville | \$10,658,672 | (\$30,310) | (\$95,094) | (\$1,024,313) | (\$136,300) | \$9,372,654 |
| Jefferson | \$224,832,905 | (\$9,040,576) | (\$5,301,004) | (\$19,044,322) | (\$26,705,200) | \$164,741,803 |
| Lafourche | \$42,119,617 | (\$360,417) | (\$300,246) | (\$4,209,831) | (\$1,837,600) | \$35,411,522 |
| Livingston | \$66,870,605 | (\$1,429,157) | (\$4,116,311) | (\$8,132,905) | (\$2,727,500) | \$50,464,733 |
| Morehouse | \$695,377 | (\$6,165) | \$0 | (\$30,755) | \$0 | \$658,457 |
| Orleans | \$145,745,892 | (\$3,237,181) | (\$2,228,159) | (\$14,862,365) | (\$15,715,900) | \$109,702,287 |
| Plaquemines | \$126,517,152 | (\$10,029,952) | (\$15,468,068) | (\$10,977,921) | (\$23,736,100) | \$66,305,111 |
| Pointe Coupee | \$1,492,382 | (\$7,622) | \$0 | (\$68,852) | (\$8,600) | \$1,407,308 |
| St. Bernard | \$39,970,141 | (\$983,291) | (\$673,914) | (\$2,751,318) | (\$4,102,500) | \$31,459,117 |
| St. Charles | \$28,260,807 | (\$510,228) | (\$143,700) | (\$2,583,197) | (\$2,373,700) | \$22,649,982 |
| St. Helena | \$10,270,904 | (\$46,705) | \$0 | (\$819,728) | (\$214,900) | \$9,189,571 |
| St. James | \$20,616,539 | (\$442,219) | (\$174,050) | (\$1,619,723) | (\$998,300) | \$17,382,247 |
| St. John the Baptist | \$281,166,289 | (\$31,155,650) | (\$47,710,796) | (\$33,061,539) | (\$45,239,900) | \$123,998,404 |
| St. Martin | \$3,913,914 | (\$14,373) | \$0 | (\$275,931) | (\$9,600) | \$3,614,010 |
| St. Mary | \$25,546,726 | (\$61,604) | \$0 | (\$2,404,258) | (\$247,300) | \$22,833,564 |
| St. Tammany | \$105,212,179 | (\$4,088,900) | (\$16,096,326) | (\$10,303,180) | (\$12,695,500) | \$62,028,272 |
| Tangipahoa | \$92,665,579 | (\$1,352,458) | (\$1,969,408) | (\$11,858,014) | (\$3,456,800) | \$74,028,900 |
| Terrebonne | \$39,614,877 | (\$403,868) | (\$71,737) | (\$3,672,068) | (\$833,500) | \$34,633,703 |
| Washington | \$25,406,549 | (\$512,169) | (\$386,889) | (\$2,564,618) | (\$501,500) | \$21,441,373 |
| West Baton Rouge | \$3,962,544 | (\$31,332) | (\$6,534) | (\$328,479) | (\$100,800) | \$3,495,399 |
| West Feliciana | \$1,545,718 | (\$15,795) | \$0 | (\$122,065) | \$0 | \$1,407,857 |
| All Other Parishes | \$158,751 | (\$5,900) | (\$65,923) | \$0 | \$0 | \$86,928 |
| Total | \$1,353,815,772 | (\$64,408,623) | (\$95,465,680) | (\$136,337,885) | (\$143,540,600) | \$914,062,985 |

¹ Source: FEMA NFIP data – March 2013 multiplied by 0.29 to estimate proportion of NFIP payments within the IA applicant pool.

² Source: FEMA IA data – reflects only those hazard insurance payments of IA applicants

C. Economic Development

1. Statewide Damage Assessment

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

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

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

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

Table 27: SBA Disaster Business Loans by Parish

| Parish | # Approved | Approved Amount \$ | Total Estimated Damage |
|------------------|------------|--------------------|------------------------|
| Ascension | 3 | \$45,900 | \$131,143 |
| Assumption | 1 | \$10,600 | \$30,286 |
| East Baton Rouge | 6 | \$354,600 | \$1,013,143 |

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

Source: SBA, May 2013

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

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

| NAICS Industry | # Approved | Approved Amount \$ | Total Estimated Damage |
|--|------------|---------------------|------------------------|
| Accommodation and Food Services | 42 | \$2,716,800 | \$7,762,286 |
| Administrative and Support and Waste Management and Remediation Services | 9 | \$117,500 | \$335,714 |
| Agriculture, Forestry, Fishing and Hunting | 35 | \$797,800 | \$2,279,429 |
| Arts, Entertainment, and Recreation | 10 | \$2,005,800 | \$5,730,857 |
| Construction | 14 | \$1,009,900 | \$2,885,429 |
| Finance and Insurance | 2 | \$24,300 | \$69,429 |
| Health Care and Social Assistance | 14 | \$789,500 | \$2,255,714 |
| Information | 3 | \$109,200 | \$312,000 |
| Manufacturing | 6 | \$246,500 | \$704,286 |
| Other Services (except Public Administration) | 63 | \$4,505,500 | \$12,872,857 |
| Professional, Scientific and Technical Services | 17 | \$597,200 | \$1,706,286 |
| Real Estate and Rental and Leasing | 285 | \$10,130,100 | \$28,943,143 |
| Retail Trade | 33 | \$1,480,500 | \$4,230,000 |
| Transportation and Warehousing | 13 | \$502,900 | \$1,436,857 |
| Wholesale Trade | 6 | \$394,200 | \$1,126,286 |
| Total | 552 | \$25,427,700 | \$72,650,571 |

Source: SBA, May 2013

2. St. John the Baptist Parish

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

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

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

Source: SBA, May 2013

3. Plaquemines Parish

SBA approved a total of 25 disaster business loans in Plaquemines Parish in Isaac’s aftermath, worth more than \$1.3 million in loan disbursements. This accounts for slightly more than 4.5 percent of the 552 loans approved statewide and more than 5.3 percent of statewide loan disbursements. Again, accounting for SBA’s reported 35 percent approval rate, the state estimates a total of \$3.8 million in Isaac-related business damages in Plaquemines Parish. As in St. John the Baptist, lessors of residential buildings and dwellings were estimated to have high proportions of damage (\$1.8 million). The state is also mindful of damages estimated to have been incurred by

the fishing industry (\$712,000), especially given that industry's relative importance within the greater Plaquemines economy.

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

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

Source: SBA, May 2013

4. Economic Development Unmet Needs

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

Table 31: Economic Development Unmet Needs by Parish

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

D. Infrastructure

1. Statewide Damage Assessment

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

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

Table 32: FEMA PA Categories

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

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

Table 33: Breakdown of FEMA PA Funding by Category

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

Source: GOHSEP, July 2013

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

Table 34: Breakdown of FEMA PA by Parish

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

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

Source: GOHSEP, July 2013

2. St. John the Baptist Parish

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

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

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

| | | |
|--------------|------------------------|------------------------|
| G | \$63,610.96 | \$15,902.74 |
| Total | \$46,828,795.16 | \$11,707,198.79 |

Source: GOHSEP, July 2013

3. Plaquemines Parish

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

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

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

Source: GOHSEP, July 2013

4. Infrastructure Unmet Needs

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

E. Summary of Unmet Needs and Additional Considerations

1. Categories of Unmet Needs

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

Table 37: Total Unmet Needs by Parish

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

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

2. Use of Urgent Need

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

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

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

3. Additional Considerations, Including Mitigation Measures

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

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

II. Strategies to Address Unmet Needs

A. Connection Between Needs Assessment and Allocation of Funds

Hurricane Isaac caused extensive damage throughout Southeast Louisiana. FEMA declared 26 parishes eligible for FEMA IA: Allen, Ascension, Assumption, East Baton Rouge, East Feliciana, Iberville, Jefferson, Lafourche, Livingston, Morehouse, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge and West Feliciana. Of those parishes, HUD’s unmet needs analysis identified five parishes as “most impacted”, meaning that HUD’s methodology identified at least \$10 million dollars of combined unmet need in the categories of housing, economic development and infrastructure. Those parishes identified as “most impacted” are St. John the Baptist, Plaquemines, Jefferson, Orleans and St. Tammany.

All activities funded using CDBG-DR dollars allocated to Louisiana will be located in a presidentially-declared parish that is eligible for Hurricane Isaac recovery assistance. The State of Louisiana is committed to ensuring that allocations are distributed in proportion to the unmet recovery needs while allowing an appropriate level of local control and input into final programmatic decisions. Resources are being allocated to the most impacted parishes – St. John the Baptist and Plaquemines – utilizing the same methodology that HUD used to develop its allocations to states and entitlement areas. This will provide resources consistent to those already provided directly to the entitlement areas of Orleans, Jefferson and St. Tammany parishes. Additionally, the state has submitted a formal request to HUD to cede a portion of Louisiana’s state grant directly to St. Tammany Parish, since the heavily impacted community of Slidell was not included in HUD’s initial calculations. This will allow the parish government to serve all of the citizens of St. Tammany Parish and provide consistency of disaster recovery services in keeping with parish long-term recovery plans. The current allocations, rounded to the nearest \$1,000, for the top five parishes are as follows:

Table 38: Allocation of Recovery Funds by Parish

| Parish | Severe Unmet Needs for Housing | Severe Unmet Needs for Business | Infrastructure Allocation | Total | Percent of Total Need (HUD)* | HUD Allocation Model |
|----------------------|--------------------------------|---------------------------------|---------------------------|--------------|------------------------------|----------------------|
| St. John the Baptist | \$32,209,028 | \$11,049,976 | \$8,411,883 | \$51,670,887 | 30.6% | \$32,674,000 |
| Plaquemines | \$20,667,472 | \$2,423,598 | \$3,718,127 | \$26,809,196 | 15.9% | \$16,953,000 |
| Jefferson | \$10,250,725 | \$9,633,152 | \$6,134,723 | \$26,018,599 | 15.4% | \$16,453,000 |
| Orleans | \$6,184,001 | \$10,747,964 | \$6,838,585 | \$23,770,550 | 14.1% | \$15,031,000 |
| St. Tammany | \$7,997,165 | \$3,467,473 | \$2,603,630 | \$14,068,268 | 8.3% | \$8,896,000 |

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

Based on the request to HUD to transfer funds to St. Tammany Parish, the state’s total allocation will be reduced from \$66,398,000 to \$64,379,000. The allocation model in Table 39 assumes that this request to transfer funds to St. Tammany will be approved by HUD.

B. Allocation of Funds

As indicated above, Louisiana will apply the HUD formula to determine a direct allocation to the two most impacted parishes that did not receive a direct allocation: St. John the Baptist and Plaquemines parishes. The remainder of the state’s resources will be used for recovery needs in the parishes within the 26 IA-eligible parishes that did not meet HUD’s \$10 million threshold, especially those parishes that had significant areas of concentrated damages. This initial Action Plan seeks to obligate funds at the state and parish levels for administrative costs to cover initial planning and the development of

partial action plans. The dollar amounts provided in the initial allocation represent the expected initial need for direct administration. The remaining will be requested as needed through the Partial Action Plan submittal process. The allocations for both the initial Action Plan and the total allocations are indicated below:

Table 39: Louisiana’s Allocation of CDBG-DR Funds for Recovery from Hurricane Isaac

| Allocations | Initial Action Plan | Future Partial Action Plans | Total Allocation* |
|---|----------------------------|------------------------------------|--------------------------|
| State Administration, Planning and Program Delivery | \$700,000 | \$2,620,000 | \$3,320,000 |
| St. John the Baptist Parish | \$55,000 | \$32,619,000 | \$32,674,000 |
| Plaquemines Parish | \$29,000 | \$16,924,000 | \$16,953,000 |
| Additional State Run Programs | \$0 | \$11,432,000 | \$11,432,000 |
| TOTAL: | \$784,000 | \$63,595,000 | \$64,379,000 |

***Allocation assumes that request to transfer funds to St. Tammany Parish will be approved.**

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

1. Allocations to Most Impacted Parishes

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

St. John the Baptist: \$32,674,000

Plaquemines: \$16,953,000

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

- Were Public Housing Authorities consulted to determine if there are unmet needs as a result of the hurricane?
- Are the projects consistent with community priorities as indicated in their recovery planning process?
- Do projects target sub-parish areas hit hardest by Hurricane Isaac?

- Will at least 50 percent of the benefit accrue to LMI households based on direct beneficiaries or areas benefited?
- Are the projects consistent with identified unmet needs as a result of Hurricane Isaac?

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

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

Housing

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

Economic Development

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

Infrastructure

- FEMA PA Cost Share program
- Project based infrastructure program

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

2. Allocations to State-Run Programs

The state intends to provide recovery funds to other impacted parishes that were designated IA eligible but did not meet HUD's unmet needs estimate threshold of \$10 million. These programs will be developed in consultation with affected parishes and described fully through the partial action plan process. **The total allocation available to state-run programs is \$11,432,000.** As with the parish allocations, the 50 percent provision to serve the LMI population will also apply to the total dollar amount of programs run through the state. The funds for state-run programs will be allocated in future Partial Action Plans.

Statewide Cost Share of Federal Funds

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

Assistance to Additional Impacted Parishes

Funds will be made available to other impacted parishes that were not considered in HUD's initial allocation due the lack of aggregate damages in total dollar amount. In particular, the parishes of Tangipahoa, Livingston and St. Bernard have been identified as containing highly impacted census tracts, defined as those tracts with greater than 5 percent damage to their housing stock. In order to serve multiple impacted parishes, the state's most likely approach will be to design and implement one or more housing programs as described below:

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

C. Method of Distribution

1. General Description

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

2. Method of Distribution Process

a. Distribution to Parishes

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

- The state will develop program criteria, basic guidelines and CDBG-DR requirements for a slate of different programs that may include housing, infrastructure, economic recovery and mitigation measures.
- Each parish will be required to develop a recovery proposal for submittal to the state. Parishes will be required to follow a Citizen Participation Plan as required by the state.
- The state will fund projects out of the parish allocation as Partial Action Plans are approved.
- Unused funds in the parish programs may be re-allocated as appropriate through Action Plan Amendments.

- Parishes will be able to use allocated funds to hire grant administrative staff and/or consultants.
- The goal is to provide the greatest possible autonomy and flexibility to parishes.

b. State-Run Programs

The state will develop program criteria, basic guidelines and CDBG-DR requirements for a slate of different programs that may include housing, economic development, infrastructure and mitigation measures. Funds for these programs will be obligated under future Partial Action Plans.

3. Deadlines and Process to Ensure Timely Expenditure of Funds

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

D. Leveraging Funds

1. Overview

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

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and the SBA. Existing state resources and other funds from the disaster appropriation will also be examined in an effort to ensure that all available funding is utilized where it is most needed.

2. Housing

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

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

3. Economic Development

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

4. Infrastructure

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

5. Other Sources of Funds

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

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

III. Planning and Coordination

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

- Oversight for ensuring impacted parishes developed Long Term Recovery Plans as required under FEMA’s ESF-14 in 2006;
- State adoption of the National Building Code Standards in 2006;
- Proactively ensuring parish adoption of the Advisory Base Flood Elevations (ABFEs) with concurrent adjustments in permits issued for new construction and height or elevation requirements issued after the respective adoptions;
- Funding of “Louisiana Speaks” – a major regional initiative for all of south Louisiana reflecting visions and strategies for resiliency and sustainable growth practices (May 2007). More than 27,000 citizens, a historical first in the United States, participated in developing the plan. The 94-page document in hardcopy and disc and two subsequent publications: “Louisiana Speaks: Planning Toolkit” and “Louisiana Speaks: Pattern Book” were widely distributed to planners, government entities, local nonprofits and associations and citizens;
- The Coastal Protection Restoration Authority (CPRA) was funded by the Louisiana Legislature to develop a Master Plan (and unanimously approved by the Louisiana Legislature on May 22, 2012) with specific projects within each parish designed for protection of the coast and communities.

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

- The state’s template for the development of a disaster recovery proposal to utilize CDBG-DR funds at the parish level is being adapted to incorporate assurances that Isaac projects will reflect “unmet needs” as established in the state’s Action Plan, as well as take into consideration and reflect:
 - i. The Isaac Parish Recovery Strategy emanating from the NDRF;
 - ii. Local ABFEs and Flood Insurance Rate Maps (FIRMs);
 - iii. The parish Hazard Mitigation Plan required by GOSHEP;
 - iv. The parish’s Long Term Recovery Plan (ESF-14);
 - v. An assessment of local land use plans, zoning and floodplain management ordinances permit requirements;
 - vi. The Master Plan of the CPRA (if applicable); and
 - vii. Regional coordination with the respective regional planning commission.

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

- OCD/DRU's project-specific applications require the identification of the mitigation being accomplished by the project, with that mitigation subsequently reflected in the plans and specifications developed by architects and engineers. Approval and authorization for the use of funds require independent review approvals by OCD/DRU, including environmental reviews and Department of Transportation and Development (DOTD) approval on plans and specifications affecting the state's Floodplain Management Program;
- The state has guidelines on elevation and costs for specific types of housing and encourages coordination of CDBG-DR funding with FEMA's Hazard Mitigation Grant Program.
- The Louisiana Housing Corporation has the responsibility to implement state-run housing programs, including disaster recovery projects. Guidelines on elevation costs will be made available, as well as "best practices" on educational outreach programs and floodplain management principles. The template for the development of affordable housing includes guidelines and evaluation criteria on sustainable development, which include Green Construction and Energy Standards.
- The Pilot Comprehensive Resiliency Program, implemented in 2010 under funding from hurricanes Gustav and Ike, is a proactive program to develop and facilitate local planning that incorporates sustainability and resiliency into land use plans, zoning and floodplain management. The program funds were made available to local governments and non-profit entities in parishes impacted by hurricanes Gustav and Ike through a competitive application process. Twenty-nine communities have been awarded grants through the competitive program. These projects include water management, floodplain ordinances, comprehensive plans, zoning codes and a plan for wetland carbon. In addition, 17 building code inspectors are being funded for a two-year period in 10 communities to assist with enforcement and adaptation of permit policies and fees to allow for those communities to ultimately sustain the effort to manage growth, compliance and blight.

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

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

- The St. John the Baptist Parish Isaac Recovery Strategy was adopted May 14, 2013, and the Plaquemines Parish Isaac Recovery strategy was adopted June 25, 2013. Both were unanimously adopted by their respective Parish Councils.
- Numerous meetings between the executive staff of OCD/DRU and St. John and Plaquemines parish officials have been held almost on a weekly basis to discuss Isaac regulations, resources, planning coordination, proposal development and local issues and impediments. Meetings were also held the week of July 22, 2013 with Tangipahoa and Livingston parishes. Parishes receiving direct entitlement funding for Isaac – Orleans, St. Tammany and Jefferson – have also been provided technical assistance by OCD/DRU and through HUD’s technical assistance contract with Enterprise Community Partners.
- St. John Parish’s Comprehensive Plan for Land Use and Zoning, which was 50 percent complete at the time Hurricane Isaac hit Louisiana, is being revamped to incorporate new data on storm surge and environmental vulnerability, as well as the CAC’s Isaac Recovery Plan.
- FEMA’s Region VI Office/Hazard Mitigation Office and the GOSHEP’s Hazard Mitigation Office have approved the first “pilot” for updating the parish’s Hazard Mitigation Plan and incorporating it into the current initiative for the Comprehensive Plan for Land Use and Zoning.
- Plaquemines Parish, in particular, faces challenges due to its repetitive flood zones reflected in the ABFEs, communities built outside its levee system, storm surge issues, subsidence and wetland erosion and limited resources divided between very small rural enclaves and a population shift to higher ground in Belle Chasse.
- OCD/DRU is a member of GOSHEP’s Hazard Mitigation Advisory Council, which was appointed to provide input into the update and revision of the State’s Hazard Mitigation Plan required by FEMA. This will provide a direct conduit for the exchange of data, information and updates with Isaac impacted communities and facilitate targeted actions that reflect more directly resiliency, sustainability and mitigation criteria in their Parish Hazard Mitigation Plans.
- The Louisiana Disaster Housing Task Force received a technical assistance grant through HUD’s OneCPD program. Under that grant, the Enterprise Community Partners has worked with the Task Force to develop program structures and models.

Training for Isaac Subrecipients on Sustainable & Coordinated Planning

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

While technical assistance to Isaac impacted parishes has already begun, throughout August and September 2013 OCD/DRU will provide individual guidance to the parishes in preparing their proposals, which are due to OCD/DRU by November 1, 2013, that will prioritize and identify recovery projects. In the coming months, OCD/DRU will conduct a Hurricane Isaac workshop addressing both Hurricane Isaac regulations and CDBG compliance in implementing projects, complying with implementation schedules in the state’s performance monitoring templates and the state’s obligation of HUD Hurricane Isaac funding and “best practices” on resiliency, sustainability and mitigation to identify “standards” for recovery.

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

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

IV. Citizen Participation

A. Citizen Participation Plan

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

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

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

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

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

1. Citizen Input

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

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

2. Louisiana Disaster Housing Task Force

As the arrival of Hurricane Isaac was imminent, the Louisiana Disaster Housing Task Force (Task Force) was activated. The Task Force includes: state personnel from OCD/DRU, GOHSEP, the LHC and the state Department of Children and Family Services (DCFS); representatives from HUD and FEMA; and members from the local Voluntary Organizations Active in Disaster.

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

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

B. Citizen Complaints

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

C. Receipt of Comments

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

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

D. Amendments to the Disaster Recovery Action Plan

1. Substantial Amendments

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

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

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

2. Submittal of Amendments

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

V. Other Criteria

A. Protection of People and Property; Construction Methods

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

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

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

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

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

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

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

C. Disaster-Resistant Housing

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

Immediately after Hurricane Isaac, LHC created a HOME Tenant-Based Rental Assistance program to serve low-income individuals and families with children, especially those with incomes below 30 percent of the AMI. There is a preference for households with disabled or elderly family members or households experiencing homelessness.

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

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

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

D. Minimize or Address Displacement

The State of Louisiana will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all subrecipients administer their programs in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR Part 570.496(a). All subrecipients will be required to demonstrate that they have adopted policies and procedures to minimize displacement in accordance with these regulations and will be monitored by the state to ensure compliance with both the URA and 104(d). In addition, Parishes will be encouraged to adopt Optional Relocation Policies for voluntary housing programs that may result in the temporary displacement of owners or tenants.

E. Program Income

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

governed by the program income guidance provided in the regulations at 24CFR570.489(e) and 24CFR85.25 and all applicable waivers.

F. Monitoring Standards and Procedures

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

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

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

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

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

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

H. Capacity

OCD/DRU was created to administer CDBG-DR funds after hurricanes Katrina and Rita. The Louisiana Recovery Authority acted as the policy making arm for the state until the agency sunset in 2010; at that time, the LRA's work was folded into OCD/DRU. OCD/DRU is presently responsible for

administering nearly \$14.5 billion in CDBG-DR funds, related to recoveries from hurricanes Katrina, Rita, Gustav and Ike. OCD/DRU has the established policies, procedures, systems and personnel to continue leading long-term recovery efforts related to Hurricane Isaac. The agency will assess the need for additional staff to ensure effective administration of Isaac grants.

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

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

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

I. Certification of Controls, Processes and Procedures

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

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

J. Other

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

Attachment A: Demographic Breakdown of St. John the Baptist and Comparison of Surrounding Areas

| Location | Total Population | Households | Households with individuals under 18 years | Households with individuals 65 years and over | Average household size | Home-ownership Rate | Homeowners with a mortgage | Number of resident workers | Poverty Rate | Median Household Income |
|----------------|------------------|---------------|--|---|------------------------|---------------------|----------------------------|----------------------------|--------------|-------------------------|
| Edgard | 2,441 | 872 | 38% | 33% | 2.80 | 77% | 39% | 721 | 24% | \$28,321 |
| Garyville | 2,811 | 1,005 | 39% | 26% | 2.80 | 78% | 48% | 882 | 29% | \$45,078 |
| LaPlace | 29,872 | 10,332 | 42% | 19% | 2.86 | 80% | 77% | 13,178 | 12% | \$53,038 |
| Pleasure Bend | 250 | 112 | 24% | 24% | 2.23 | 84% | 49% | 38 | 0% | \$76,111 |
| Reserve | 9,766 | 3,369 | 42% | 23% | 2.85 | 77% | 59% | 3,481 | 22% | \$39,357 |
| Wallace | 671 | 234 | 47% | 27% | 2.87 | 83% | 41% | 177 | 29% | \$21,960 |
| Rest of Parish | 113 | 41 | 34% | 22% | 2.76 | 93% | 68% | 117 | N/A | N/A |
| Total | 45,924 | 15,965 | 42% | 22% | 2.85 | 79% | 68% | 18,594 | 16% | \$47,666 |

| Location | Total Population | Households | Households with individuals under 18 years | Households with individuals 65 years and over | Average household size | Home-ownership Rate | Homeowners with a mortgage | Number of resident workers | Poverty Rate | Median Household Income |
|-----------------------------|------------------|---------------|--|---|------------------------|---------------------|----------------------------|----------------------------|--------------|-------------------------|
| St. John the Baptist | 45,924 | 15,965 | 42% | 22% | 2.85 | 79% | 68% | 18,594 | 16% | \$47,666 |

| | | | | | | | | | | |
|---------------------------------|-----------|---------|-----|-----|------|-----|-----|---------|-----|----------|
| Ascension | 107,215 | 37,790 | 44% | 18% | 2.82 | 81% | 71% | 45,680 | 12% | \$63,716 |
| Lafourche | 96,318 | 35,486 | 37% | 24% | 2.67 | 76% | 53% | 40,667 | 16% | \$47,492 |
| Livingston | 128,026 | 46,007 | 42% | 20% | 2.76 | 80% | 65% | 48,884 | 11% | \$54,708 |
| St. Charles | 52,780 | 18,557 | 42% | 21% | 2.81 | 80% | 67% | 23,079 | 13% | \$60,961 |
| St. James | 22,102 | 7,717 | 40% | 27% | 2.84 | 84% | 49% | 8,951 | 14% | \$51,725 |
| Tangipahoa | 121,097 | 45,135 | 35% | 23% | 2.60 | 70% | 57% | 39,812 | 23% | \$38,957 |
| New Orleans-Metairie-Kenner MSA | 1,167,764 | 455,146 | 33% | 23% | 2.52 | 63% | 64% | 429,595 | 16% | \$47,647 |

Source: 2010 U.S. Census

Attachment B: Demographic Breakdown of Plaquemines Parish and Comparison of Surrounding Areas

| Location | Total Population | Households | Households with individuals under 18 years | Households with individuals 65 years and over | Average household size | Homeownership Rate | Homeowners with a mortgage | Number of resident workers | Poverty Rate | Median Household Income |
|----------------|------------------|--------------|--|---|------------------------|--------------------|----------------------------|----------------------------|--------------|-------------------------|
| Belle Chasse | 12,679 | 4,463 | 46% | 20% | 2.82 | 64% | 65% | 4,524 | 10% | \$66,730 |
| Boothville | 854 | 302 | 39% | 25% | 2.83 | 88% | 46% | 262 | 33% | \$21,625 |
| Buras-Triumph | 1,161 | 419 | 38% | 21% | 2.77 | 85% | 46% | 476 | 22% | N/A |
| Empire | 993 | 391 | 32% | 24% | 2.54 | 88% | 47% | 390 | 8% | \$48,333 |
| Port Sulphur | 1,760 | 581 | 39% | 30% | 3.00 | 90% | 55% | 690 | 18% | \$27,469 |
| Venice | 202 | 71 | 34% | 34% | 2.70 | 85% | 48% | 50 | 0% | \$16,840 |
| Rest of Parish | 5,393 | 1,850 | 29% | 28% | 2.92 | 89% | 58% | 1,936 | N/A | N/A |
| Total | 23,042 | 8,077 | 42% | 23% | 2.82 | 75% | 57% | 8,328 | 12% | \$54,730 |

| Location | Total Population | Households | Households with individuals under 18 years | Households with individuals 65 years and over | Average household size | Home-ownership Rate | Home-owners with a mortgage | Number of resident workers | Poverty Rate | Median Household Income |
|--------------------|------------------|--------------|--|---|------------------------|---------------------|-----------------------------|----------------------------|--------------|-------------------------|
| Plaquemines | 23,042 | 8,077 | 42% | 23% | 2.82 | 75% | 57% | 8,328 | 12% | \$54,730 |

| | | | | | | | | | | |
|---------------------------------|-----------|---------|-----|-----|------|-----|-----|---------|-----|----------|
| Jefferson | 432,552 | 169,647 | 32% | 26% | 2.53 | 64% | 64% | 169,250 | 14% | \$48,175 |
| Orleans | 343,829 | 142,158 | 28% | 21% | 2.33 | 48% | 61% | 112,362 | 24% | \$37,468 |
| St. Bernard | 35,897 | 13,221 | 38% | 19% | 2.69 | 69% | 51% | 14,468 | 15% | \$39,200 |
| New Orleans-Metairie-Kenner MSA | 1,167,764 | 455,146 | 33% | 23% | 2.52 | 63% | 64% | 429,595 | 16% | \$47,647 |

Source: 2010 U.S. Census

Attachment C: Demographic Breakdown of Plaquemines & St. John the Baptist by Age, Race & Ethnicity

C-1: Demographic Breakdown - St. John the Baptist Parish

| Geography | Total Population | Under 5 Years | 5 to 17 Years | 18 to 64 Years | 65 Years and Older | White alone, not Hispanic | Black alone, not Hispanic | Hispanic | Asian-P. Islander, not Hispanic | Other, not Hispanic |
|----------------|------------------|---------------|---------------|----------------|--------------------|---------------------------|---------------------------|----------|---------------------------------|---------------------|
| Edgard | 2,441 | 7% | 17% | 60% | 16% | 4% | 94% | 1% | 0% | 1% |
| Garyville | 2,811 | 9% | 17% | 62% | 12% | 45% | 53% | 1% | 0% | 1% |
| LaPlace | 29,872 | 7% | 20% | 64% | 9% | 44% | 47% | 6% | 1% | 2% |
| Pleasure Bend | 250 | 6% | 11% | 69% | 13% | 94% | 2% | 3% | 0% | 1% |
| Reserve | 9,766 | 8% | 20% | 61% | 12% | 36% | 59% | 3% | 0% | 1% |
| Wallace | 671 | 9% | 19% | 59% | 13% | 7% | 90% | 1% | 0% | 1% |
| Rest of Parish | 113 | 6% | 15% | 67% | 12% | 59% | 38% | 2% | 0% | 1% |

C-2: Demographic Breakdown - Plaquemines Parish

| Geography | Total Population | Under 5 Years | 5 to 17 Years | 18 to 64 Years | 65 Years and Older | White alone, not Hispanic | Black alone, not Hispanic | Hispanic | Asian-P. Islander, not Hispanic | Other, not Hispanic |
|----------------|------------------|---------------|---------------|----------------|--------------------|---------------------------|---------------------------|----------|---------------------------------|---------------------|
| Belle Chasse | 12,679 | 8% | 22% | 61% | 10% | 80% | 8% | 6% | 2% | 3% |
| Boothville | 854 | 6% | 20% | 63% | 11% | 60% | 24% | 1% | 6% | 9% |
| Buras-Triumph | 1,161 | 8% | 20% | 64% | 9% | 61% | 10% | 3% | 19% | 8% |
| Empire | 993 | 6% | 19% | 64% | 12% | 65% | 21% | 3% | 8% | 3% |
| Port Sulphur | 1,760 | 7% | 20% | 61% | 12% | 24% | 65% | 2% | 1% | 8% |
| Venice | 202 | 9% | 18% | 58% | 15% | 84% | 6% | 1% | 1% | 7% |
| Rest of Parish | 5,393 | 5% | 19% | 61% | 15% | 55% | 38% | 3% | 1% | 3% |

Source: 2010 U.S. Census

Attachment D:

State of Louisiana, Division of Administration

Office of Community Development, Disaster Recovery Unit

GRANTEE CERTIFICATIONS

- a. The grantee certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within its jurisdiction and take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard (see [24 CFR 570.487\(b\)\(2\)](#) and [570.601\(a\)\(2\)](#)). In addition, the grantee certifies that agreements with subrecipients will meet all civil rights related requirements pursuant to [24 CFR 70.503\(b\)\(5\)](#).
- b. 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.
- c. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- d. 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 contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, 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.
- e. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- f. The grantee certifies that it will comply with the acquisition and relocation requirements of

are consistent with its Action Plan.

- f. 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.
- g. 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](#).
- h. 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 UGLG 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).
- i. Each State receiving a direct award under this Notice certifies that it has consulted with affected UGLGs 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.
- j. The grantee certifies that it is complying with each of the following criteria:
 - (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic

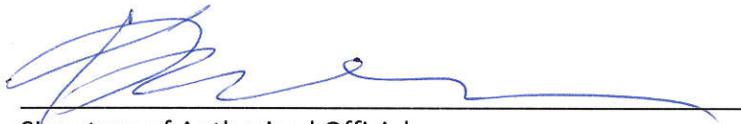
revitalization in the most impacted and distressed areas for which the President declared a major disaster in the aftermath of Hurricane Isaac, pursuant to the Stafford Act.

- (2) 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.
 - (3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent of the grant amount is expended for activities that benefit such persons.
 - (4) 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).
- k. The grantee certifies that it (and any subrecipient or recipient) 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.

- l. The grantee certifies that it has adopted and is enforcing the following policies. In addition, the grantee certifies that it will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - (1) 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
 - (2) 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.
- m. The grantee certifies that it (and any subrecipient or recipient) has the capacity to carry out disaster recovery activities in a timely manner; or the state will develop a plan to increase capacity where such capacity is lacking.
- n. The grantee will not use grant funds for any activity in an area delineated as a special flood hazard area or equivalent in FEMA's most recent and current data source 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 latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- o. 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](#).
- p. The grantee certifies that it will comply with applicable laws.

q. The grantee certifies that it has reviewed the requirements of this Notice and requirements of Public Law 113-2 applicable to funds allocated by this Notice, and that it has in place proficient financial controls and procurement processes and has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud and abuse of funds.



Signature of Authorized Official

Aug. 28, 2013
Date

Kristy H. Nichols, Commissioner
Division of Administration

Attachment F:
State of Louisiana
Office of Community Development/Disaster Recovery Unit

Citizen Participation Plan
CDBG-Disaster Recovery

The primary goal of the Louisiana Citizen Participation Plan is to provide all Louisiana citizens with an opportunity to participate in the planning, implementation and assessment of the state's CDBG-DR programs for recovery from Hurricane Isaac. This plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen involvement in the recovery process. The state will provide all citizens with the opportunity to comment, with an emphasis on reaching low- to moderate-income individuals and residents of the impacted communities where the CDBG-DR funds are targeted. Additionally, efforts will be made to provide access to the plan to citizens with Limited English Proficiency (LEP) and those requiring special options due to disabilities.

States receiving CDBG-DR funds for disasters occurring in 2011 or 2012 were given several waivers relative to the Citizen Participation regulations, such as the requirement for public hearings at the state and local level, consulting with all units of local governments, etc. The State of Louisiana will employ innovative methods to communicate with our citizens and to solicit their views on the proposed uses of disaster recovery funds. These comments and the state's responses will be made a part of the initial Action Plan.

The Louisiana Citizen Participation Plan for CDBG-Disaster Recovery from Hurricane Isaac will be placed on OCD/DRU's website at <http://www.doa.louisiana.gov/cdbg/dr/drhome.htm>. The state will ensure that local governments or subrecipients who receive funds will also have a Citizen Participation Plan that meets the CDBG-DR regulations and takes into consideration the waivers and alternatives made available under CDBG-DR funding.

In order to facilitate citizen participation requirements and to maximize citizen interaction in the development of the Disaster Recovery Action Plan and subsequent Partial Action Plans and amendments, the state will take the following actions to encourage participation and allow equal access to information by all citizens. The state also encourages the participation of statewide and regional institutions and other organizations (including businesses, developers and non-profit and faith-based organizations) that are involved with or affected by the proposed programs or activities.

I. Proposed Disaster Recovery Plan and Following Substantial Amendments

A. Public Notices and Comment Period

Prior to the submittal of the Disaster Recovery Action Plan, subsequent Partial Action Plans and amendments to HUD, a summary of the plan will be published in a minimum of four MSA

newspapers, along with newspapers in targeted parishes where funding will be provided. Included in the four MSA newspapers will be *The Advocate*, the state's legal journal.

The plan will also be placed on OCD/DRU's website for review and comments. On the day that the public comment period begins, a press release will be issued to media outlets statewide and to members of the Louisiana Legislature.

A limited number of proposed plans will be made available at no charge to persons requesting copies. Copies of the proposed plan will also be available for review in OCD/DRU's Baton Rouge and New Orleans offices.

The public comment period will last a minimum of seven calendar days. This process will be repeated whenever the state has a substantial amendment to the Action Plan.

B. Methods for Public Comment

Citizens and organizations can comment on the state's Action Plan and any following substantial amendments via:

- The OCD/DRU website, <http://www.doa.louisiana.gov/cdbg/dr/drhome.htm> ;
- Email at ocd@la.gov;
- Telephone, 225-219,9600 or LA Relay Service - 711;
- Facsimile, 225-219-9605; or
- Mail at the Office of Community Development/Disaster Recovery Unit, P.O. Box 94095, Baton Rouge, LA 70804-9095.

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

C. Responses to Public Comments

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

D. Substantial Amendments to the Action Plan

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

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

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

Citizens and units of general local government will be provided with reasonable notice and an opportunity to comment on proposed substantial amendments to the Action Plan. The process for public comment will be the same as for the initial Action Plan. Citizens will have no less than seven calendar days to comment on the amendment, and responses will be included in the final version submitted to HUD for approval.

Non-substantial amendments to the Action Plan will be posted on the OCD/DRU website after notification is sent to HUD and the amendment becomes effective. Every amendment to the Action Plan, both substantial and non-substantial, will be numbered sequentially and posted on the website.

E. Performance Reports

The state must prepare and submit to HUD quarterly reports on the uses of CDBG-DR funds and of the activities funded with those dollars. The Quarterly Performance Reports (QPR) will be submitted through HUD's Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter.

Each QPR will include information about the uses of funds in the activities and programs identified in the Action Plan and entered into the DRGR system. This includes, but is not limited to:

- Project name, activity, location and national objective met;
- Funds budgeted, obligated, drawn down and expended;
- The funding source and total amount of non-CDBG-DR funds spent on an activity;
- The beginning and actual completion dates of completed activities;
- Achieved performance outcomes, such as the number of housing units completed or the number of LMI citizens benefitted; and
- The race and ethnicity of persons assisted under direct-benefit activities.

The state must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the state to affirmatively further fair housing will also be included in the QPRs.

Within three days of submission to HUD, each QPR must be posted on the OCD/DRU website.

During the term of the grant, the subrecipient will provide citizens, affected local governments and other interested parties with reasonable and timely access to information and records relating to the approved program, to the subrecipient's use of grant funds and the contracts procured with CDBG-DR funding. This information will be posted online and provided upon request.

The state's first QPR is due after the first full calendar quarter following the first allocation of grant funds. The QPRs will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

II. Technical Assistance

The state will provide technical assistance to facilitate citizen participation where requested, particularly to groups representative of LMI persons. The level and type of technical assistance will be determined by the applicant/recipient based upon the specific need of the community's citizens.

III. Citizen Complaint Procedures

The state will respond to complaints from citizens related to the Action Plan, subsequent amendments or quarterly performance reports. Written complaints should be directed to OCD/DRU either via email at ocd@la.gov or mail at:

Office of Community Development/Disaster Recovery Unit

P.O. Box 94095

Baton Rouge, LA 70804-9095

ATTN: Executive Director

The state will provide a timely, substantive written response to the complainant within 15 working days of the receipt of the complaint, where practicable.

Additionally, the state will require that its subrecipients follow a Citizen Complaint procedure reflective of the goals of the Citizen Participation Plan. A copy and/or summary of the citizen complaints received by subrecipients will be forwarded to OCD/DRU. The complainant must be made aware by the subrecipient that, if he or she is not satisfied with the response from the subrecipient, a written complaint may be filed with OCD/DRU.

IV. Citizen Participation Requirements for Subrecipients and Local Governments Participating in CDBG-DR Programs

To ensure applicant and subrecipient compliance with Section 508 of the Housing and Community Development Act of 1974, utilizing the citizen participation waivers HUD provided, all local units of government that receive CDBG-DR funds must have a written and adopted Citizen Participation Plan that:

- A. Encourages citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of the areas or neighborhoods in which CDBG-DR funds are proposed to be used;
- B. Provides citizens with reasonable and timely access to local meetings, information and records relating to the subrecipient's proposed and actual use of funds under this program;
- C. Provides for technical assistance to groups representative of persons of low and moderate income that request such assistance, with the level and type of assistance to be determined by the subrecipient;
- D. Provides for reasonable opportunities to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities and review of program performance.

In order to comply with the citizen participation requirement, information must be posted on the subrecipient or unit of local government's official website. If a unit of local government does not have an official website, the information must be posted in public places in the jurisdiction, with directions as to where the information may be inspected. In addition to web posting or advertising, the public can also be made aware of grant information by public service announcements and bulletins posted at public places. All comments must be responded to and maintained;

- E. Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
- F. Identifies how the needs of non-English speaking residents will be met where a significant number of non-English speaking residents can be reasonably expected to participate.

The provision and implementation of a Citizen Participation Plan may not be construed to restrict the responsibility or authority of the subrecipient for the development and execution of its community development program.

All subrecipients must adopt a Citizen Participation Plan and provide documentation of compliance throughout the term of the grant agreement. The plan must include the following components.

G. Components of the Subrecipient's Citizen Participation Plan

1. Program Design Phase

The subrecipient will determine plans and procedures to post and allow for public comment. Public comments shall be summarized and submitted with the information provided to OCD/DRU, where practicable.

2. Implementation Phase

During the term of the grant, the subrecipient will provide citizens, affected local governments and other interested parties with reasonable and timely access to information and records relating to the approved program, the use of grant funds and the contracts procured with CDBG-DR funding. Efforts should be made to post this information on the subrecipient's official website and also to be provided upon request.

3. Substantial Amendment to Approved Program

The subrecipient shall make any substantial amendment to the programs available on its website, where practicable, in addition to the state's posting of the amendment on the OCD/DRU website.

4. Close-Out

The subrecipient shall make all performance reports available to the public on its website and upon request.

5. Technical Assistance

The subrecipient must provide technical assistance to facilitate citizen participation where requested, particularly to groups representative of persons of low to moderate income. The level and type of technical assistance shall be determined by the applicant/recipient based upon the specific need of the community's citizens.

6. Complaint Procedures

As stated above, each subrecipient must have written citizen and administrative complaint procedures. The procedure(s) must be posted on the subrecipient's website, or information must be provided to citizens as to where and when they can obtain a written copy.

The Citizen Participation Plan must also state that persons wishing to object to approval of a CDBG-DR application by the state may make such objection known to OCD/DRU in writing. The state will consider objections made only on the following grounds:

- a. The applicant's description of needs and objectives is plainly inconsistent with available facts and data;
- b. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; and
- c. The application does not comply with the requirements set forth in the Action Plan and amendments to the plan or other applicable laws.

Such objections should include both identification of the requirements not met and, in the case of objections relative to program design, the complainant must supply the data upon which she or he relied.

7. Performance Hearings

Prior to close-out of the community development program, the subrecipient must have a public hearing to obtain citizen views and to respond to questions relative to the recipient's performance. This hearing shall be held after adequate notice, at times and locations convenient to actual beneficiaries and with accommodations for the disabled and non-English speaking persons provided.

Documentation must be kept at the local level to support compliance with the aforementioned requirements.

Attachment G

Responses to Public Comments

Four public comments were received, all from nonprofit agencies serving the Isaac-affected population through the FEMA-funded Isaac Disaster Case Management program. Those agencies are: Terrebonne Readiness and Assistance Coalition, Catholic Charities of the Diocese of Baton Rouge, Catholic Charities Archdiocese of New Orleans and Lutheran Social Services Disaster Response. The comments below are combined from the responses provided by these four agencies, and the responses are to the combined comments.

Comment 1: Request to create a Homeowner Roof Repair and a Homeowner Repair and Rebuild Program

Three of the four nonprofit organizations requested that the state utilize a portion of the \$11,432,000 allocated for State-Run Programs for a Roof Repair and a Homeowner Repair and Rebuild Program for homeowners residing in parishes without a direct allocation. It was requested that the implementation of a Roof Repair Program coincide with the disaster case management program period, which is scheduled to end in July 2014. Additionally, the agencies requested that funds for a Homeowner Repair and Rebuild Program be leveraged with volunteer labor provided by nonprofit agencies.

Response:

Homeowner needs vary across a wide spectrum of housing types, as well as degrees of damage, and the state recognizes the need for multiple programs to match those needs, including such repairs that may be covered under a Minor Repair program or Homeowner Rehabilitation program.

Given the limited resources available for its Isaac-recovery efforts, the state is exploring any and all options at its disposal to leverage these disaster recovery CDBG funds with other public and private resources to address unmet needs in a responsible manner. Therefore, the state is currently analyzing the feasibility and utility of stand-alone programs, such as the Minor Repair and Homeowner Rehabilitation programs suggested in the above comment, compared to cost share options pairing CDBG-DR funding with other sources that may provide a more effective recovery.

The state has and will continue to engage stakeholders from the public, private and nonprofit communities across the entire affected area in order to develop programs and solutions that best fill its unmet needs and fulfill the state's mission to rebuild safer, stronger and smarter.

Comment 2: Request that applicants be considered eligible for housing programs even if they received CDBG-DR funds from a prior disaster

Catholic Charities Archdiocese of New Orleans requested that applicants be considered eligible for housing repair programs even if they received CDBG-DR funds from a prior disaster.

Response:

The state will not create prohibitions to serve populations who received CDBG-DR funds from a prior disaster, except where federal regulatory and statutory requirements apply.

Comment 3: Request to fund legal services to help property owners resolve property succession issues

Two agencies requested that the state utilize a portion of the \$11,432,000 allocated for State-Run Programs for a program that provides legal services to resolve property succession issues for homeowners residing in parishes that do not have their own allocation.

Response:

If it becomes evident that property succession issues become a major impediment to recovery, the state will work to determine the best course of action at that time.

Comment 4: Request to fund a Forgivable Loan Program

Catholic Charities Archdiocese of New Orleans requested that the state utilize a portion of the \$11,432,000 allocated for State-Run Programs for a Forgivable Loan Program, so that homeowners in parishes without a direct allocation could complete additional repairs.

Response:

The state is considering relevant available data and unmet needs in making funding determinations for the State-Run Program allocation, and it will consider a forgivable loan program as a possible part of the housing recovery investment.

Comment 5: Request to fund a Program that provides grants to replace appliances and furniture

Catholic Charities of the Diocese of Baton Rouge requested that the state utilize a portion of the \$11,432,000 allocated for State-Run Programs for grants to replace appliances and furniture for homeowners residing in parishes without a direct allocation.

Response:

The replacement of appliances and furniture is not an eligible CDBG-DR expense. The state is committed to working with its partner agencies to identify additional funding sources to address needs outside of the scope of CDBG-DR funds.

Comment 6: Request for State-Run Program allocation formula to be applied to serve all eligible parishes that do not have their own allocation

Catholic Charities of the Diocese of Baton Rouge requested that the state reserve a portion of the \$11,432,000 allocated for State-Run Programs for parishes that do not have their own allocation according to proportionate level of damage.

Response:

The state does intend to reserve a portion of the \$11,432,000 for programs serving parishes that did not have their own allocation. Those programs will be defined in one or more future Partial Action Plan(s), each of which will also undergo a review period for public comment. Although the state will seek to target resources to areas with high concentrations of damage and significant unmet needs, it would not be feasible to allocate resources utilizing the same unmet needs estimates used in the initial allocations.

Given that there are 21 additional parishes that were declared eligible for Individual Assistance (IA), some with very little damage at the aggregate level, it may be better policy to target resources based on a specific recovery need and make it available to all eligible parishes. For example, if the state were to provide resources for flooded properties that were underinsured because they were not in the flood plain, the allocation would look different than if the state were to prioritize mitigation efforts within the flood zone. Neither of these scenarios would likely align perfectly with the original estimates of damage. Even though the state will not use direct proportion of the estimated damage levels, regardless of what is chosen, the most impacted and damaged parishes are still likely to receive the most resources.