



**LA SAFE**

## **Program Guidelines**

**Operational Version 1.0**

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## VERSION HISTORY

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## 1.0 INTRODUCTION

### 1.1 National Disaster Resilience Competition (NDRC) Overview

The U.S. Department of Housing and Urban Development (HUD), in collaboration with the Rockefeller Foundation, conducted a two-phase National Disaster Resilience Competition (NDRC) to distribute \$1 billion in funding to state and local governments to help communities recover from natural disasters and advance resilience-building initiatives.

At the competition's conclusion, HUD awarded Community Development Block Grant National Disaster Resilience (CDBG-NDR) funds to thirteen (13) state and local governments. The State of Louisiana was awarded \$92,629,249 of CDBG-NDR funds for the following projects, to be administered by the Office of Community Development – Disaster Recovery Unit (OCD-DRU):

- **Louisiana's Strategic Adaptations for Future Environments (LA SAFE)** – \$39,750,000 for the planning and capitalization of a State-administered fund to provide gap assistance for public, privately-owned and/or nonprofit projects and programs for Resilient Housing, Resilient Transportation, Resilient Energy, Resilient Infrastructure, Economic Development, Public Services, Community Nonstructural Mitigation/Flood Risk Reduction, and/or Planning/Education. These concept proposals will be presented as project, program, and policy recommendations emanating from a multi-phase, community-driven planning effort, which will be codified in parish-wide Strategic Adaptation Plans. Using information and projects identified in the Strategic Adaptation Plans, the State will work with eligible communities to select CDBG-NDR projects to be funded through the LA SAFE Program. In addition to the HUD award, the State of Louisiana has committed an additional sum of \$250,000 in supporting leverage and an additional \$7,500,000 from other CDBG-DR grant sources, bringing the total value of the initiative to \$47,500,000.
- **Isle de Jean Charles Resettlement** – \$48,379,249 for the Resettlement of Isle de Jean Charles, a coastal island community in coastal Terrebonne Parish currently experiencing severe land loss and extreme flood risks, to a resilient and historically contextual community. The Resettlement of Isle de Jean Charles is broken down into three phases: (1) Data Gathering and Engagement, (2) Site Selection, Acquisition, and Master Planning and (3) Construction and Development.

In addition to the funds for these two (2) projects, HUD awarded the State \$4,500,000 in CDBG-NDR for administrative costs.

Projects and programs funded with CDBG-NDR assistance must address an unmet recovery need as a result of Hurricane Isaac while also mitigating the effects of future vulnerabilities, notably coastal land loss, sea-level rise, and subsidence. Projects and programs funded with CDBG-DR assistance must address an unmet recovery need as a result of hurricanes Katrina or Rita or hurricanes Gustav or Ike, respectively.

### 1.2 LA SAFE Overview

LA SAFE is a statewide resilience policy framework focused on helping communities plan for – and implement – safer, stronger, and smarter development strategies within three basic typological scenarios.

These scenarios are (1) **Low Risk Areas**, or those with favorable future flood risk projections (0'-3' in a

100-year flood event projected in 2067) and which have current development opportunities to receive populations and economic activity from more flood-prone environments; (2) **Moderate Risk Areas**, or those with future flood risk projections (3'-6' in a 100-year flood event projected in 2067 or currently located within the FEMA 100-year floodplain) conducive to maintaining current population levels and economic trends provided such communities orient future development and mitigation activities in alignment with future flood risk projections; (3) **High Risk Areas**, or those with less favorable future flood risk projections (6'+ in a 100-year flood event projected in 2067) and those who would expect to experience population and economic losses, up to and including full community-scale resettlement, as environmental conditions deteriorate and repetitive severe flood events take place. To support this process, OCD-DRU is utilizing the Coastal Protection and Restoration Authority of Louisiana's (CPRA) analytical model, the Coastal Louisiana Risk Assessment (CLARA), to estimate flood depths and damages that may potentially occur as a result of major storms projected over the next 50 years.

LA SAFE will be implemented as a planning and capital investment program in an initial six-parish target area. These parishes are Jefferson, Lafourche, Plaquemines, St. John the Baptist, St. Tammany, and Terrebonne. While these guidelines are envisioned to govern planning and program implementation for the initial awarded program portfolio, they may also provide a model for future awards and investment decisions financed through other local sources, federal assistance programs and/or other statewide efforts to mitigate future community flood risk.

The program's initial goals are as follows:

- 1) To generate parish-wide, community-driven plans focusing on opportunities for residents and stakeholders to proactively adapt and prepare for anticipated environmental changes in the next 10, 25 and 50 years; and
- 2) To provide gap funding for critical projects that will make Louisiana's at-risk communities more resilient. Furthermore, LA SAFE is intended to identify and develop scalable and transferrable resilience-building models within the initial six-parish target area.

Awards made through LA SAFE are intended to fill a potential void between capital outlay, conventional financing, grants, and other non-traditional funding sources. LA SAFE's capitalization through this initial CDBG investment is a first step toward cementing Louisiana's place as the national laboratory for resilience-building techniques and technologies.

The State of Louisiana will remain compliant with all CDBG requirements until all allocated funds and associated program income are expended on eligible activities. As LA SAFE matures, it may seek additional capital from financial institutions, philanthropic organizations, private equity, and other external sources.

### **1.3 LA SAFE Framework**

The program has three responsibilities: planning; award-making (investments); and fund-development (investment-capitalization). LA SAFE will provide gap financing for planning, design, and new construction or rehabilitation projects based on priority program areas set through the LA SAFE framework. As such, LA SAFE currently recognizes eight program areas: Resilient Housing; Resilient Transportation; Resilient

Energy; Resilient Infrastructure; Economic Development; Community Nonstructural Mitigation/Flood Risk Reduction; Planning; and Public Services/Education.

To be included in the Strategic Adaptation Plan and ultimately eligible for an award a project must fall within at least one current priority program area as described below:

### 1.3.1 Resilient Housing

As communities contemplate future land loss, subsidence, and flood risk conditions, the availability, affordability, and condition of housing stock within a particular locale is a vital consideration in anticipation of future population movements and economic activities. For **Low Risk Areas**, this contemplates highest and best uses of available lands with minimal future flood risks and high population growth potential, with an emphasis placed on multi-family, mixed-use developments and affordable homeownership opportunities. Within **Moderate Risk Areas** and **High Risk Areas**, this contemplates the needed quantity of housing units to serve a population projected to either remain at current levels or decline over time and appropriately sized for economic or other vital assets within close proximity. Additionally, such units should be envisioned to be constructed or rehabilitated with an appropriate style, density, and quality contextually in alignment with a 50-year projection of future flood risk.

- Eligible projects may include the planning, design, and implementation of housing rehabilitation or new unit construction projects.
- Eligible projects may facilitate the rehabilitation or new construction of rental or owner-occupied unit types.
- New construction and/or rehabilitation of rental housing should provide a minimum of 25 new units within a housing-only or mixed-use development.
  - At least 51 percent of all newly-constructed rental units must be affordable for low to moderate income (LMI) families. Affordable rents are defined as the total monthly housing cost of rent and utilities for an eligible LMI family which is not more than one-twelfth of 30% of the applicable AMI limitation for the area, adjusted for family and bedroom size. The unit and bedroom size is based on an imputed occupancy of 1.5 persons per bedroom and 1 person for efficiency units. All newly-constructed affordable rental units will be subject to a reasonable period by which such units must remain affordable. The reasonable period of affordability will be determined through project underwriting and the amount of funding awarded for a project.
  - Selection criteria will provide additional consideration to projects leveraging other funding sources, such as HOME or Low-Income Housing Tax Credits (LIHTC).
- New construction and/or rehabilitation of owner-occupied housing should provide a minimum of 25 new units within a housing-only or mixed-use development.
  - The structure of the homeownership assistance for all newly-developed owner-occupied housing units should be targeted primarily to populations earning less than 120 percent of AMI, with additional preference and/or program benefit given to families earning 80 percent or less of AMI.

- Gap financing through the offering of “soft-second” mortgages to homeowners may be eligible for this program.
- All newly-constructed or rehabilitated units must be constructed to withstand a projected 100-year flood event as envisioned in a particular locale over the 50-year CLARA modeling period.
- Preference will be given to projects maximizing housing unit density within areas projected to experience minimal future flood risk.
- Preference will be given to projects located near critical economic assets, employment centers, schools, and transit routes/hubs.

*Eligible Activities:* Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Relocation – 105(a)(11); Activities Carried Out through Nonprofit Development Organizations – 105(a)(14); Assistance to Neighborhood Based Non-Profit Organizations- 105(a)(15); Housing Services – 105(a)(20); Homeownership Assistance – 105(a)(24)

### 1.3.2 Resilient Transportation

As part of holistic, strategic planning around future projections of land loss, subsidence, flood risk and population and economic changes anticipated in conjunction with changing environmental conditions and anticipated disaster impacts, transportation connectivity in support of vital economic assets and supply chains must be considered at a systems-level and designed to withstand acute disaster impacts with minimal interruptions interfering with the movement of people and goods.

- Eligible projects will include the planning, design and implementation of activities that either decrease physical vulnerabilities of current transportation networks and/or create new transit nodes or networks that increase safety and social and economic connectivity.
- Eligible projects must consider, and even emphasize, multimodal transportation options (i.e. car, ride-share, biking, rail, bus, and walking).
- Preference will be given to projects facilitating multiple benefits, including those providing transportation-oriented development opportunities enhancing economic activity or population growth in locales projected to have minimal future flood risks.
- Alternative modes of transportation that can take advantage of the natural systems and provide new, innovative ways to mobilize people such as gondolas and water taxis are encouraged.
- All transportation projects should be accessible by, and provide benefit to, a wide range of users.

*Eligible Activities:* Acquisition of Real Property – 105(a)(1); Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Public Services – 105(a)(8); Payment of the Non-Federal Share – 105(a)(9)

### 1.3.3 Resilient Infrastructure

**Low Risk Areas** must contemplate infrastructure needs associated with potentially rapidly growing populations and economic activities as migrations take place in response to ongoing environmental degradation and acute disaster impacts. Meanwhile, **High Risk** and **Moderate Risk Areas** must anticipate infrastructure that can support static or declining populations while withstanding potential future disaster

impacts. In **High Risk Areas**, especially, consideration must be given to the removal or adaptive reuse of orphaned infrastructure no longer needed to service a smaller or non-existent future population.

- Eligible projects will include the planning, design, and/or construction of new or adapted infrastructure that quantitatively reduces future flood risk.
- Eligible projects will include those that demonstrably increase the potential for population and economic growth within corridors anticipated to experience minimal future flood risks.
- Eligible projects will include traditional built infrastructure only if proposed projects integrate EPA standard green infrastructure practices. Uses of downspout disconnection, rainwater harvesting, rain gardens, planter boxes, bioswales, permeable pavement, green streets, green roofs, tree planting, and land conservation will be preferred.
- Planning and implementation of an infrastructure rollback program will be eligible for funding under this program. An infrastructure rollback program must explain how infrastructure is removed, where the waste will be brought, and how the land will be returned to the best possible natural state.

*Eligible Activities:* Acquisition of Real Property – 105(a)(1); Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2); Public Services – 105(a)(8); Payment of the Non-Federal Share – 105(a)(9)

### **1.3.4 Resilient Energy**

Adaptive communities must contemplate future energy uses in anticipation of potential population gains and losses, as well as future economic activities in environments with both favorable and unfavorable future flood risk profiles. Specifically, in **Low Risk Areas**, considerations should be made to design new energy systems or expand the capacity of existing energy systems to emphasize a minimal carbon footprint, and where applicable, should incorporate smart grid technologies and net-zero concepts. Additionally, alternative energy sources, such as geothermal and wind/water power technologies should be incorporated, especially in **Moderate Risk** and **High Risk Areas**, which may become isolated from more traditional power distribution systems over time.

- Eligible projects will include the planning, design, and/or installation of new systems and technologies that decrease future risk through protections or enhancements of a community's energy supply and/or grid.
- Eligible projects may include, but are not limited to, renewable electric and thermal generation, high-efficiency Combined Heat and Power (CHP) (65 percent efficient) and fuel cells (50 percent efficient), energy storage (electric or thermal), energy management systems (controls, switches, software), islanding technology, and microgrids. Conventional technologies, such as diesel generators, will not be eligible.
- Private utilities are ineligible for assistance.
- Projects will be required to be able to operate in island mode continuously for at least 3 days, with longer duration projects receiving priority.
- New or retrofitted existing systems will be eligible.

*Eligible Activities:* Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2); Public Services – 105(a)(8); Payment of the Non-Federal Share – 105(a)(9)

### **1.3.5 Economic Development**

Adaptive communities must contemplate future economics and economic development opportunities in anticipation of potential population gains and losses. **Low Risk Areas** should consider what moves may be necessary to enhance current economic opportunity in anticipation of increased population growth. Additionally, **Low Risk Areas** should consider how diversification of economy could take place as the labor force increases. **Moderate Risk** and **High Risk Areas**, which may become isolated from more traditional power distribution systems and supply chains over time, should contemplate economic development opportunities taking advantage of current and future environmental conditions, including but not limited to those related to the water economy, or those taking advantage of recreational opportunities native to local access to water bodies and undeveloped natural areas/wetlands. **Moderate Risk Areas** must be able to meet their economic needs so as to maintain viability to service key economic hubs. **High Risk Areas** must contemplate industries supported by primarily commuter populations and must be able to withstand frequent, severe flooding events.

- Eligible projects may include the planning, design and/or implementation of activities primarily creating job opportunities for vulnerable and low-to-moderate income individuals.
- Projects may include assistance to businesses and infrastructure in community employment centers located on high ground, with a goal of buying down risk for commercial development.
- Economic development projects must create value for the communities in which they are located. Preference will be given to those economic development strategies that can show how their industry(ies) will enhance the lives of low-to-moderate individuals both directly and indirectly.
- Preference may be given to those economic development strategies and industries that contribute to the development of the state’s resilience sector. Applicants will be responsible for demonstrating how their economic development strategies positively impact and tie to the resilience efforts described within this program document.
- Consideration may be given to the number of jobs created and/or retained per dollar of CDBG-NDR investment. Each economic development project will undergo a full underwriting and assessment of feasibility and sustainability.

*Eligible Activities:* Acquisition of Real Property – 105(a)(1); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Assistance to Neighborhood Based Non-Profit Organizations- 105(a)(15); Economic Development Assistance to For-Profit Business – 105(a)(17); Microenterprise Assistance – 105(a)(22)

### **1.3.6 Community Nonstructural Mitigation/Flood Risk Reduction**

Cognizant of the flood-prone nature of Louisiana in general and specifically within its Coastal Zone, current and future development patterns cannot be realistically located exclusively within areas exhibiting minimal flood risk. Moreover, with large-scale flood events taking place with increasing intensity and

frequency outside of the 100-year floodplain, measures must be adopted to reduce risk even within those areas that have not traditionally been subject to severe flood events in the past. Therefore, in **Low Risk Areas**, community scale protective measures are appropriate both in anticipation of growing future populations and economic activities and flooding events that may exceed those currently projected through the 50-year modeling data. Moreover, in **Moderate Risk** and **High Risk Areas**, strategic mitigation measures must be taken to protect vital assets – and the community development buildouts supporting those assets – to ensure minimal adverse impacts from the flood events that can be anticipated over a 50-year timespan.

- Eligible mitigation projects must:
  - Identify cost effective and tested actions for risk reduction that are agreed upon by stakeholders and the public;
  - Focus resources on the greatest risks and vulnerabilities to the greatest many people;
  - Build partnerships by involving people, organizations, and businesses;
  - Increase education and awareness of hazards and risks; and
  - Align risk reduction with other community objectives.
- Structural mitigations should be limited in scale and provide a demonstrable, quantifiable benefit for an industry or community. Additionally, priority will be given to projects that incorporate green/blue building practices that mimic natural environmental processes.
- Strategies should utilize existing best practices in land use planning, building code adaptations and education efforts to plan for current and future risk.
- Strategies should utilize green infrastructure and innovative, community-level techniques to incrementally reduce risk, or at least maintain a current risk profile. Downspout Disconnection, Rainwater Harvesting, Rain Gardens, Planter Boxes, Bioswales, Permeable Pavements, Green Streets and Alleys, Green Parking, Green Roofs, Urban Tree Canopy, and Land Conservation. A helpful resource for green building practices can be found through the EPA at <https://www.epa.gov/smartgrowth/green-building-standards>, but projects are not limited to EPA recommendations.
- Retrofitting may consider the needs of particular niche industries to preserve their ability to operate in emergent, recovery and normal conditions.
- Activities should focus on strategic, targeted nonstructural mitigations supporting vital economic interests. Such interventions may include limited development of workforce housing and elevations of existing property supporting a nearby economic asset.
- Strategies and projects at the household scale are encouraged but priority will be given to those strategies and projects that take a holistic approach to incorporating mitigation and flood risk reduction practices at a community or neighborhood scale.

*Eligible Activities:* Acquisition of Real Property – 105(a)(1); Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2); Code Enforcement – 105(a)(3); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Public Services – 105(a)(8); Payment of the Non-Federal Share – 105(a)(9)

### 1.3.7 Planning

Through the development of Strategic Adaptation Plans, LA SAFE places emphasis on using the state's best understanding of future land loss and flood risk conditions to orient future community development patterns. While the program's initial planning effort has been designed to take a high-level, regional approach to further define how development decisions may occur in accordance with future environmental conditions, it is not a comprehensive, granular plan. As such, further planning initiatives may be appropriate to detail specific community and/or systems-scale approaches to development around future risk, vulnerability, and opportunity.

- Resilience Planning projects may focus resilience strategies across multiple fields, and will be judged on a case-by-case basis. These may include general education initiatives, projects designed to create quantifiable benefits such as those intended to improve Community Rating System (CRS) scores, or they may target vulnerable populations including substance abuse disorders and other mental health conditions exacerbated by disaster events.
- In **Low Risk Areas**, planning efforts may contemplate, but are not exclusive to, future infrastructure or transportation needs to facilitate population and/or economic growth, or in anticipation of growth currently underway or expected to occur over the next 50 years.
- In **Moderate Risk Areas**, planning efforts may focus on strategic mitigation of community-scale risk, geared toward maintaining current population levels and currently occurring economic activities.
- In **High Risk Areas**, planning efforts may contemplate future community-scale resettlements, where appropriate. Additionally, planning efforts may focus on specific essential and immovable assets as well as a minimal community development footprint required to service those assets.

*Eligible Activities:* Planning and Capacity Building – 105(a)(12); Technical Assistance – 105(a)(19)

### 1.3.8 Public Services/Education

In order for Louisiana to orient its current and future community development footprint around land loss, flood risk, and general propensity to experience disaster events, it is essential the public be well educated relative to the best information the state has at its disposal outlining those current and future disaster risks. Moreover, as disadvantaged populations are more likely to experience adverse disaster impacts, initiatives to account for and mitigate such impacts may be appropriate.

- Eligible projects will provide a new or a quantifiable increase in resilience-enhancing public services to a community.
- Project types may include, but are not limited to, employment services, public safety, health services, substance abuse services, energy conservation services, services for senior citizens, education curriculum development and training programs and services for in-classroom use and/or specifically targeted toward disabled or homeless persons.

*Eligible Activities:* Public Services – 105(a)(8); Planning and Capacity Building – 105(a)(12); Technical Assistance – 105(a)(19); Assistance to Institutions of Higher Education – 105(a)(21)

## 2.0 LA SAFE PROGRAM

### *Introduction*

The LA SAFE program is composed of two phases – Investment Phase (Planning) and Investment Capitalization Phase (Implementation).

LA SAFE targets projects in Plaquemines, St. John the Baptist, Jefferson and St. Tammany parishes as well as selected census tracts in Terrebonne and Lafourche parishes. These projects must address an unmet recovery need as a result of Hurricane Isaac while also mitigating the effects of future vulnerabilities, notably coastal land loss, sea-level rise and subsidence.

During the Investment (Planning) Phase, potential projects will be identified through a year-long, community-driven, collaborative and multi-phased planning process involving OCD-DRU, local foundations, units of general local government (UGLGs), for-profit businesses, community-based non-profit organizations, community development financial institutions, community-based economic development organizations, local boards or other subunits of government, community-based affordable housing organizations, business owners and the public at large. The Investment Phase involves the development of an adaptation strategy plan for each of the six (6) parish target areas that includes a list of potential projects, programs, and policy recommendations that contribute to community resilience and sustainability. The adaptation strategy plans will be developed by the State, using baseline data from the CPRA and information gathered through a series of five community engagement events in which the state, its partner organizations and communities discuss area-specific risks and opportunities related to the parishes and communities within those parishes. The adaptation strategies will also explore community-originated opportunities for innovative solutions, ensure sustainable investments, identify potential funding sources to leverage CDBG resources and examine CDBG eligibility. Each project identified in the adaptation strategy will include a project profile that includes a conceptual scope, cost estimate and time schedule.

Through the Investment Capitalization (Implementation) Phase, OCD-DRU will award certain projects identified in the Strategic Adaptation Plans. OCD-DRU may implement the projects directly, and/or through grantees and subrecipients. OCD-DRU will analyze the list of potential projects that originate out of the series of community meetings and select a limited number of projects to invest in and advance to the Investment Capitalization Phase. Projects will be selected for funding based on OCD-DRU's assessment of the project's quantifiable resilience building impact as well as such factors as CDBG eligibility, project feasibility and sustainability, public benefit, community preference, project readiness and leverage. Projects that involve the construction of public facilities or other permanent improvements may require a unit of local government or other organization to execute a binding agreement to accept responsibility for the long term operation and maintenance of the improvements in conformance with NDRC requirements prior to a project advancing to the Investment Capitalization Phase.

Additional preference may be given to projects that involve organizations with offices in Louisiana. The LA SAFE Program seeks to create a home-based industry specializing in adaptation.



**LA SAFE Fund Target Area**

In order to be eligible for CDBG-NDR funding, projects must be located within the six-parish LA SAFE Fund target area and address an unmet recovery need as a result of Hurricane Isaac while also mitigating the effects of future vulnerabilities, notably coastal land loss, sea-level rise and subsidence. The LA SAFE Fund target area includes all of Plaquemines, St. John the Baptist, Jefferson and St. Tammany parishes as well as Census Tracts 11, 12.02, 13 and 14 in Terrebonne Parish and Census Tracts 209, 210, 211, 212, 213 in Lafourche Parish. The funds for this project must be used in the eligible target areas; however, the state sees this as an opportunity to pilot out projects that can be replicated and expanded to other parishes throughout the state in the future.

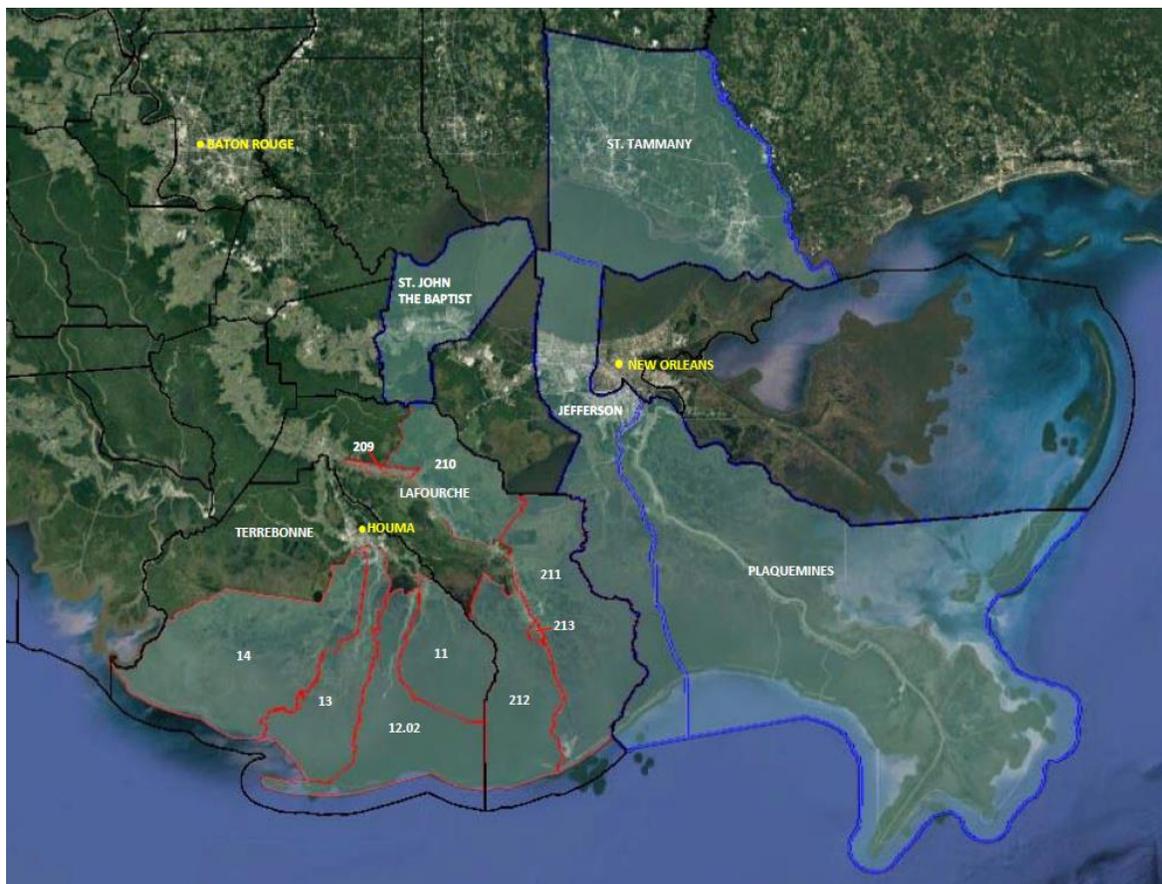
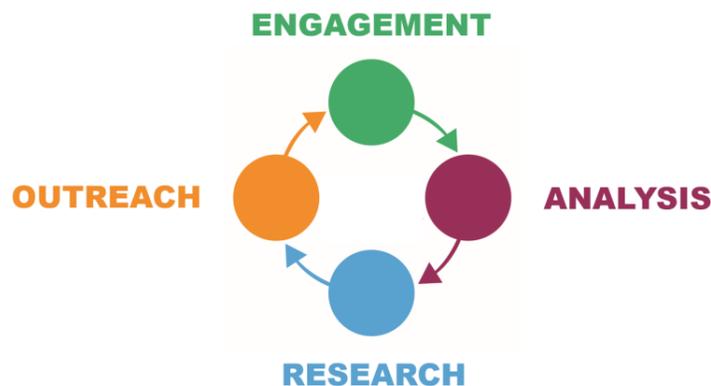


Figure 1 - LA SAFE Fund Target Area

Further, each project must be classified as a High Risk Area, Moderate Risk Area or Low Risk Area project and geographically identified as such based on CPRA’s future projections developed with the CLARA modeling system. This data can be found here: <http://cims.coastal.louisiana.gov/floodrisk/>.

## 2.1 Engagement & Planning

In its initial planning effort culminating with the creation of Strategic Adaptation Plans, LA SAFE has integrated a robust grassroots engagement and outreach effort to drive the goals and objectives of its plan-making process, while also working to educate citizens and stakeholders about the state’s best information outlining current and future environmental conditions. Through a cyclical, iterative planning process, LA SAFE worked with the people and leadership in each of the six LA SAFE parishes to develop projects, programs and plans for their communities. The graphic below visualizes the process by which LA SAFE did research, conducted outreach, engaged with the community, analyzed the results and then repeated the process over again. The final products of LA SAFE came as a result of this process.



### 2.1.1 Engagement

During the year-long planning process in the development of parish and regional adaptation strategies, the LA SAFE team conducted extensive public outreach and engagement efforts. As a result of 5 rounds of planned community engagement events across the six-parish target area, 71 meetings with 3,079 individual participants have occurred. Events have targeted and included parish residents, elected officials, representatives of local nonprofits and foundations, representatives of nongovernmental and economic stakeholder groups, and other community stakeholders.

#### *Round 1 Meetings*

The first round of LA SAFE meetings kicked off the planning process, coordinating meetings at the parish-level. At these six parish-wide meetings, including 509 individual participants, the project team – comprised of state staff, consultant and expert partners and philanthropic non-profit organizations – presented all of the data collected on the community’s particular parish, focusing on land loss, flood risk, population movements, and economic change. This information laid the groundwork for a “community conversation” honing in on goals and values that LA SAFE should pursue going forward. The majority of

the meeting centered on two small group activities, both of which were organized around three general aspects of the project: Community and Culture; Environment and Sustainability; and Economy and Jobs.

The first activity included a map depicting current and future land loss and population shifts between 2000 and 2010. The second activity asked citizen participants what aspects of their home communities are important to protect and preserve, and how they can be strengthened, improved or expanded. The feedback from this meeting was then organized into groups of similar ideas within overarching categories of Strengths, Opportunities, and Challenges. Each table group had a table host who was responsible for facilitating the conversation and ensuring ideas were captured. A table scribe from UNO-CHART documented the meeting.

### *Round 2 Meetings*

The second round of LA SAFE meetings focused on citizen engagement on a smaller community scale. The team held 21 meetings in 19 separate towns and cities, including 551 participants, across the six parish target area. Meetings were held in areas recommended to the team by participants of the first round of engagement events, and two were specifically designed for speakers of Khmer (native language of Cambodia) or Vietnamese. Meetings held at this level allowed the team to present a more in-depth view of the trends in each community and to gather input at the community level.

In this series of community meetings, residents pinpointed challenges, proposed solutions, and collectively described a future across different types of environments and different levels of flood risk. The project team combined their ideas and mapped proposed strategies. These community recommendations will form the basis for the projects, programs, and policies that LA SAFE includes in the strategic adaptation plans and pursues through the Investment Capitalization Phase. The program team reviewed these ideas, taking into consideration current and future environmental risks, as well as best practices in planning. The round two activity was structured around a large table map of the area showing the 2067 flood risk map and a set of subject-area question cards. The subjects were oriented around three high-level categories – Community & Culture, Economy & Jobs, and Environment & Sustainability – and question cards prompted group discussions around concepts of economic development, infrastructure, transportation, social opportunities and community development needs and opportunities particular to the community, given 10, 25 and 50-year flood risk projections. Residents chose one card from each color category and discussed a set of questions displayed on the back of that card. Each card prompted residents to write and draw on their maps to show areas in need or those with potential growth. Residents were encouraged to write, draw, and point out where potential projects and programs would be most successful. A table scribe from UNO-CHART documented the meeting.

### *Round 3 Meetings*

At the third round of meetings, LA SAFE pivoted from the big picture to the specific projects, programs, and policy options supporting a vision in alignment with the 2067 projection of flood risk. These series of eight meetings occurred at the parish level and brought in 387 participants from a wide array of stakeholder groups. As with the second round, two events were specifically planned for Khmer and Vietnamese-speaking populations. The meetings centered around three core interactive components. The

first was a snap-polling exercise in which the program team asked the room multiple choice questions as a primer to the activity that would occur at the second half of the meeting. The results were sent in via clicker devices allowing for the data to be collected and reviewed instantly. The second component of the meeting was the presentation of a future community vision in alignment with low, moderate, and high future flood risks. After presenting a visual representation of future communities designed in accordance with a future understanding of flood risk, residents were polled on their level of agreement with that future communal vision using the same clicker technology seen prior to this activity. The third component of the meeting drilled down on the individual projects, programs, and policies that could support a future community vision at various levels of flood risk. On large table sheets, residents evaluated ideas organized according to planning category and risk level. Residents placed green dots on the ideas they supported and red dots on ideas that they did not support. They also added new ideas and commented on the strategies shown as part of a facilitated conversation. A table scribe from UNO-CHART documented the meeting.

#### *Round 4 Meetings*

The fourth round of engagement events occurred at the end of October and beginning of November 2017. This round of engagement events took the ideas gathered during the first three rounds of community meetings and presented new versions of those concepts in the form of project and program types. These example projects, as the LA SAFE team called them in Round 4, were more specific than what had been presented and discussed in previous meetings, but still broad overall. The fourth round of meetings allowed the project team an opportunity to collaborate with the community and relevant stakeholders to clarify and pin down the projects, programs and policies that made most sense for them.

The LA SAFE team conducted two different meeting formats for Round 4 that engaged over 340 individual participants over the course of 30 separate assignments. The first type of engagement in each parish was formatted as a focus-group meeting, in which the LA SAFE team engaged government officials and stakeholder groups to help drill down on the feasibility, community impact and alignment with existing efforts for potential projects and programs. The LA SAFE team opened each focus-group with a short presentation about the process to date, then facilitated discussion of the proposed projects. The second type of meeting in each parish was a community open-house, in which residents were invited to drop in at their convenience to view and comment on the progress of project development in an informal, conversational setting. The information gathered during the fourth round of meetings, and subsequent conversations that came from those meetings, influenced the final projects brought to the fifth round of meetings.

At the conclusion of Round 4, the State began working with its project team to develop candidate project and program proposals to a level at which their costs and benefits can be accurately estimated. This information will be used to inform descriptions included in the final Strategic Adaptation Plans.

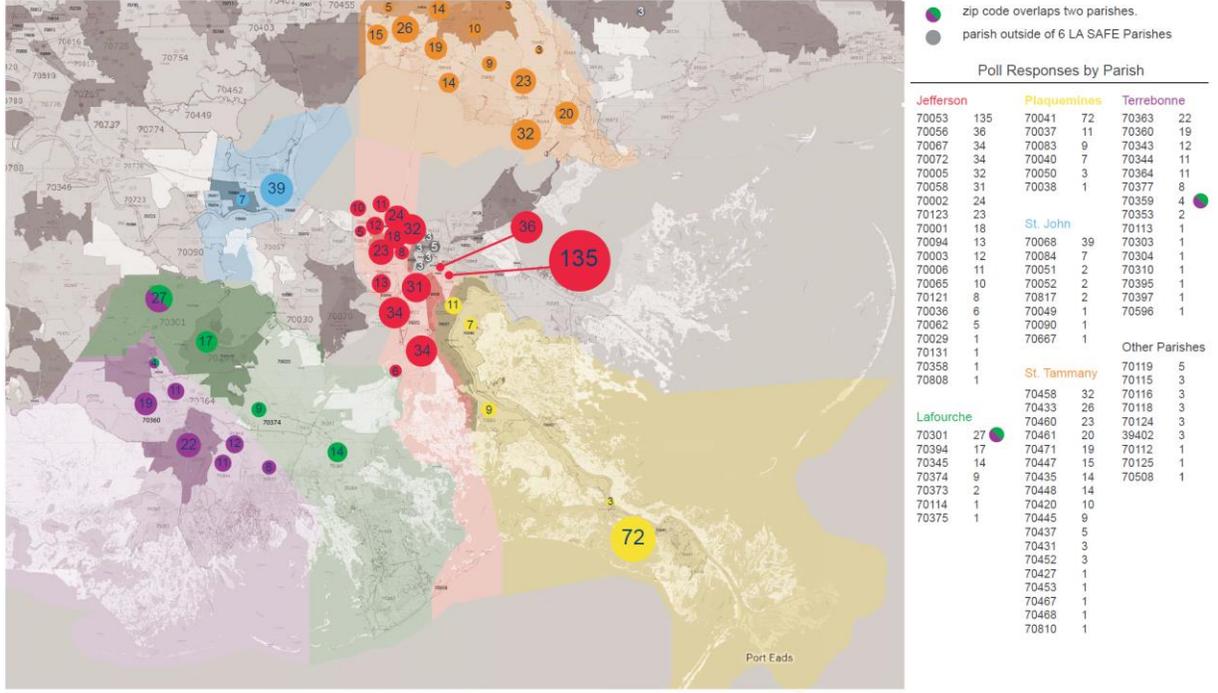
#### *Round 5 Meetings*

Round 5 community engagement events were structured as expositions highlighting the proposed projects, programs and policy recommendations identified and developed as a result of the year-long LA

SAFE planning effort. The LA SAFE team invited community members and interested stakeholder groups in each parish to rank in order of their preference each of the six projects or programs proposed for investment. The projects brought to the final round of meetings came as a result of the engagement efforts conducted by the team with the communities in previous rounds. The LA SAFE team presented each proposal on a project board that detailed the benefits, costs and initial conceptual designs for the proposed projects and programs. To indicate their preference, residents were each given six tokens, two gold tokens worth two points each (the most favorable), two green tokens worth one point each and two tokens worth zero points each (the least favorable). The meetings were set up in a way that both new and returning participants could feel comfortable and welcome. To help orient guests, welcome tables and stations provided an overview of LA SAFE, the planning process and information about delta history as well as current and future conditions. The meetings featured arts and crafts, local music and food provided by local caterers thanks to OCD's foundation partner, the Foundation for Louisiana. 531 individual stakeholders participated in-person during the fifth round of LA SAFE meetings. Another 517 individuals participated in Round 5 through the online public participation tool.

In addition to the public preference activity that occurred in person the project team also set up an online survey. The online survey was set up for a variety of reasons. The first reason for setting up an online survey was in order for the team to take into account the preferences of residents who could not be at the meeting due to inclement weather, holiday activities or other conflicts of schedule. The second reason for setting up an online survey was to account for the geographical predicament that arises when hosting a single public meeting that may be many miles away from interested parties who would like for their voice to be heard. The online surveys were unveiled at midday the following day of each meeting. Each of the surveys were left open for three weeks.

# LA SAFE ROUND 5 POLL RESPONSES BY ZIP



After the fifth round, the LA SAFE team scored each demonstration project proposal according to the scoring criteria outlined in section 2.2 *Investment Selection*. The LA SAFE team convened a selection committee at the beginning of the first quarter of 2018 and selection of LA SAFE-funded demonstration projects occurred in the first quarter of 2018. The Strategic Adaptation Plans are currently being compiled and are expected to be published by the end of the third quarter of 2018. Concurrently, the LA SAFE team will begin demonstration project implementation activities in the second quarter of 2018. Although only ten demonstration projects will be funded through this process, all proposed projects, programs and policies developed in partnership with the community throughout the year-long LA SAFE planning process will be included in the Strategic Adaptation Plans, which will frame the long-term vision, goals and objectives for each parish and for the state of Louisiana.



## 2.1.2 Plan Development

In collaboration with local government, community leaders, and community organizations, OCD-DRU will develop an adaptation plan based on recovery, revitalization, sustainability, and resilience for each of the six (6) parish target areas. The main goal of the planning process is twofold: (1) to develop a forward-looking comprehensive plan that incorporates potential climate change impacts and (2) to co-design the future vision of the community with members of the community. Each plan will identify potential projects that will address risk and vulnerabilities and other community development opportunities in the targeted geographic areas. As described above in the Engagement Rounds, program and project proposals will come from a collaborative planning process that includes residents, elected officials, and other key stakeholders.

The adaptation plan will include an analysis of community assets, identification of current and future risks and incorporation of community development needs, objectives and opportunities. The plans incorporate best practices, scientific inputs and the community's experience and profiles of potential projects will be included in the adaptation plan document. Project profiles will include descriptive details and information on project location, resilience strategies the project will promote, the project's costs, implementation time schedule and how the project addresses recovery or resilience needs resulting from the covered disaster. The project profiles will be a direct result of the program team taking in the innumerable data points from the years long planning process and turning the future visions of the residents into hard projects.

For more information, please visit <http://www.lasafe.la.gov>.

## 2.2 Project and Program Investment Selection

### 2.2.1 Investment Selection Requirements and Scoring Criteria

Final project selection was based on 1) whether a project met specific eligibility and baseline criteria, 2) additional weighted selection criteria and 3) considerations applicable to funding an array of programs and projects across multiple priority program areas and with the intent to build a funding portfolio that maximizes available resources and provides a demonstration of how different types of projects can achieve multiple benefit. A panel comprising of OCD-DRU program, policy, legal, and compliance staff selected the final project and program proposals to be funded using CDBG-NDR funds.

#### *Baseline Eligibility Requirements*

In order to be selected for CDBG-NDR capital investment, a project must be able to meet the following baseline requirements:

- Project must be a CDBG-NDR eligible activity;
- Project must be able to meet a national objective within CDBG-NDR timelines;
- Project must have a clear tie to the storm (Hurricane Isaac, for CDBG-NDR, hurricanes Katrina or Rita or hurricanes Gustav or Ike for CDBG-DR);
- Project must have an eligible unmet need after accounting for all duplication of benefits;

- Project must meet specific project area requirements (e.g. economic development underwriting, infrastructure limitations, housing composition, see section 1.3 LA SAFE Framework);
- Project must be feasible and sustainable; all funding sources must be firmly committed and the local, responsible entity must have the resources committed to ensure on-going maintenance and operations;
- Project must be compatible with the CPRA’s Coastal Master Plan.

Additional preference may be given to projects that are able to be replicated or scaled in other locales with similar attributes and/or current and/or future risk profiles. Furthermore, it is the intention of the State to equitably distribute CDBG-NDR funds across the program’s target areas and across Low, Moderate, and High Risk levels. Finally, preference may be given to equitably award proposals across different proposal types as outlined in section 1.3 LA SAFE Framework.

<b>BASELINE CRITERIA</b>	
<i>Every project must meet the following criteria to be considered for funding</i>	
<i>Project is a <b>CDBG-NDR eligible activity (or CDBG-DR, as applicable)</b>:</i>	Y / N
<i>Project meets a <b>national objective</b> within CDBG-NDR timelines (or CDBG-DR, as applicable):</i>	Y / N
<i>Project has a <b>clear tieback</b> to Hurricane Isaac (or Katrina/Rita or Gustav/Ike, as applicable):</i>	Y / N
<i>Project has an eligible unmet need after accounting for all <b>duplication of benefits</b>:</i>	Y / N
<i>Project meets specific <b>project area requirements</b> (e.g. economic development underwriting, infrastructure limitations, housing composition):</i>	Y / N
<i>Project is <b>feasible and sustainable</b>; all funding sources are firmly committed and the local, responsible entity has the resources committed to ensure on-going maintenance and operations:</i>	Y / N
<i>Project is <b>compatible with CPRA’s Coastal Master Plan</b>:</i>	Y / N

### Scoring Criteria

In addition to meeting the baseline requirements listed above, the panel will review projects included in the strategic adaptation plans and will rank and score projects based on the following criteria:

#### Scoring Criteria

Type	Description	Maximum Points
<i>Leverage</i>	Points will be awarded based on funding sources identified in addition to CDBG funds. 4 points will be awarded to proposals with a ratio of 1:3 (other sources/CDBG); 6 points awarded to proposals with a ratio of 1:2; 8 points awarded to proposals with a ratio of 1:1; 10 points will be awarded to proposals with a ratio in excess of 1:1. Cash or contributions, such as land donations, will be recognized as acceptable leverage. Volunteer labor or other "sweat equity" contributions will not be recognized.	10
<i>LMI Benefit</i>	Points will be awarded based on whether a proposal predominantly (51 percent) benefits a low-to-moderate-income (LMI) population. Points will be awarded on an all-or-nothing basis.	20
<i>Public Preference</i>	Points will be awarded based on public polling of proposals as gathered at the fifth and final round of parish-scale public engagement events. Maximum points will be awarded to proposals receiving highest levels of recorded preference. Points will be subsequently awarded to proposals at cascading intervals based on a proportional level of public support.	20
<i>Public Benefit (Quantitative)</i>	Points will be awarded based on a proposal's ability to quantify public benefit. For example, this would account for the number of units created or rehabilitated in a housing proposal, the number of jobs created in an economic development proposal, etc... These quantifiable measures will vary by project type and are subject to their recognition by the scoring committee.	20
<i>Public Benefit (Qualitative)</i>	Points will be awarded based on a proposal's novel or unique approach to address a specific consideration relative to future flood risk and environmental conditions. This may include a proposal's ability to be scaled or replicated in other locales, or a proposal's value on a research or proof-of-concept basis. These qualitative benefits will be judged by the scoring committee relative to other proposals considered on a parish-by-parish basis.	20
<i>CRS Score</i>	Points will be awarded based on a proposal's applicability relative to the Community Rating System (CRS). Points will be awarded on an all-or-nothing basis.	10

**Total            100**

### *Project Selection Process*

Following the fifth and final round of community engagement events at the end of 2017, the LA SAFE team convened the LA SAFE Project Selection Committee. The Selection Committee assigned scores to each of the 36 potential demonstration projects and programs presented to stakeholders during the final engagement round, utilizing methodology and metrics enshrined within the baseline and scoring criteria illustrated within this section. The Selection Committee was comprised of officials from OCD-DRU, with technical assistance from the LA SAFE team. The composition of the Selection Committee included staff from Infrastructure, Economic Development, Outreach, Legal, Policy and the Executive departments.

Prior to convening the Selection Committee, the LA SAFE project team evaluated each demonstration project and program to ensure each met baseline criteria. 34 of 36 proposals met all seven of the baseline criteria. Next, the LA SAFE team evaluated each proposal and populated quantitative scoring categories, as appropriate. These categories included Leverage, LMI Benefit, Public Preference and CRS Score. The Selection Committee then convened to assign scores for Public Benefit (Qualitative) and Public Benefit (Quantitative) categories.

The Selection Committee was first convened on February 9, 2018 from 9:00 a.m. until 4 p.m. During this convening, the Selection Committee was briefed on the LA SAFE process and on the 36 demonstration proposals for funding consideration. The Committee began assigning preliminary scores during this meeting. During the first and second Selection Committee meetings, a panel of outreach and subject matter experts were available to provide project-specific information related to each of the projects. Program staff who were presenting to the Selection Committee were responsible for following up and gathering additional information requested by the members of the Selection Committee. The Selection Committee then convened a second time on March 8, 2018 from 9:00 a.m. until 12:00 p.m. to further deliberate preliminary scores and evaluate additional project information requested at the first convening. At the third gathering, on April 11, 2018, the Selection Committee finalized scores for each project as well as a funding portfolio. In total, the LA SAFE Project Selection Committee met three separate times for a combined 11 hours. Across the three separate committee convenings, the Selection Committee used consensus scoring. To select projects, the Selection Committee first selected top scoring projects in each parish. Once top scoring projects were selected for funding, the Selection Committee prioritized the Louisiana Wetland Education Center (LWEC) and the Emerging Industry Business Incubator to ensure topical diversity across the funded portfolio and specifically to ensure implementation of projects in the Education and Economic Development categories, as outlined in section 1.3.

Specifically, LWEC was chosen as it was the only demonstration project proposed facilitating the creation of an educational facility designed to highlight and enhance the public's understanding of the state's coastal crisis, the value of its wetland areas and the connection between the coastal crisis and the state's ongoing surge flood risks. Additionally, the Business Incubator was selected as a project addressing Economic Development, responsive to ongoing feedback collected across the LA SAFE outreach and engagement process regarding the need to diversify in emerging economic areas, such as coastal and wetland engineering, development of alternative energy industries and growth opportunity in the ecotourism sector. The Scoring Committee also took into consideration both projects' public support, with each project the second-most preferred in Jefferson and Lafourche parishes, respectively, based on data collected during Round 5 Meetings.

Ultimately, 10 projects were selected for funding. Seven of these projects are to be fully funded with CDBG-NDR resources. One project is to be funded with a blend of CDBG-NDR and CDBG-DR awards emanating from previous disasters. One project is to be funded fully with CDBG-DR awards emanating from previous disasters. Finally, one project is to be partially funded with CDBG-NDR funds and partially with L-CDBG funds. These projects and funding sources are summarized in the table below. On April 20,

2018, Governor John Bel Edwards announced these 10 projects at a press conference at Gretna City Park in Gretna, Louisiana.

*Funded Project Portfolio*

The below table represents the ten projects selected through the LA SAFE initiative. For more information on the LA SAFE Project Portfolio please go to the following link:

<https://s3.amazonaws.com/lasafe/2018/N-04/2018-Summary-Strategy-Development-Project-Selection.pdf>

Parish	Project	Score
Jefferson	Gretna Resilience District Kickstart * // **	96
	Louisiana Wetland Education Center *	51.8
St. Tammany	Safe Haven Blue-Green Campus & Trails *	88
St. John the Baptist	Airline & Main Complete Streets * // ***	96
Terrebonne	Lake Boudreaux Living Mitigation *	90
	Buyouts for Permanent Resident Households *	77.2
Lafourche	Emerging Industry Business Incubator **	68.9
	Resilient Housing Prototype *	73.6
Plaquemines	Harbor of Refuge*	80
	Mental Health & Substance Abuse Program*	71

\* Funded with CDBG-NDR // \*\* Funded with CDBG-DR // \*\*\* Funded with L-CDBG

**St. Tammany Parish**

**Safe Haven Blue-Green Campus & Trails**



**Primary Resilience Themes:** Stormwater Management, Culture & Recreation

**National Objective:** LMI Limited Clientele

**CDBG Funding Source:** CDBG-NDR

**Eligible Activities:** Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2)

Even in higher ground locations, natural systems must be maximized to retain stormwater in response to current and future flood risk. The Safe Haven Blue-Green Campus & Trails project is a Community  
September 2018

Nonstructural Mitigation/Flood Risk Reduction and Public Services project that will enhance detention capabilities in a critical drainage area adjacent to Cane Bayou, protecting campus facilities and surrounding neighborhood residences. The project, located in Mandeville, will divert stormwater into existing forested land, illustrating how a multi-phase development with existing infrastructure in vulnerable environments can be repurposed to benefit surrounding areas. The project aims to catalyze development that integrates the parish-owned Safe Haven Campus and the essential services it provides into the surrounding community, with the ultimate goal of destigmatizing mental health and substance abuse programs and encouraging an inclusive culture in which Safe Haven’s critical services are better utilized.

During the first round of LA SAFE meetings, the project team hosted stakeholders of St. Tammany Parish at Northshore High School in Slidell. At this meeting, many residents recently affected by the floods of May and August 2016 were interested in discussing LA SAFE’s ability to help alleviate flood conditions both along the coast and near rivers, bayous and streams. The data gathered during this meeting clearly reveal residents’ anxiety about flood risk. Residents mentioned feeling stressed, nervous and concerned for the future condition of their community. The project team noted ten specific instances where attendees mentioned feeling fear and hopelessness. The residents who attended this meeting also expressed a desire to maintain the high quality of life in the parish through smarter development decisions as the population continues to grow. Meeting attendees spoke to a need for the regulation of certain development, especially in how it relates to environmental impact and putting people at risk. Much of the discussion in the first meeting revolved around recurring themes of smarter development, environmental impact and the high quality of life in St. Tammany. These categories were referenced approximately 150 times in a meeting that was attended by around 85 people. In the second round of meetings, attendees from Mandeville specifically identified a need to increase connectivity and to alleviate flood risk in the community. In round three, the project team presented attendees with a vision for St. Tammany Parish based on the data gathered in the previous two rounds of engagement. Residents agreed with the overall vision and presented the project team with recommendations for specific projects ideas. They wanted to see projects that increased greenspace and stormwater retention capabilities and improved connectivity in areas of low and moderate risk. In the fourth round of engagement, the parish and representatives from Safe Haven proposed the Safe Haven Blue-Green Campus & Trails project idea as an opportunity to implement the concepts recommended by the public during the previous rounds of LA SAFE meetings. Residents confirmed their desire to have improved stormwater management capabilities as well as essential social and mental health services in St. Tammany Parish during the public polling process in the round five meetings. Those who marked their preference for a particular project during round five collectively chose this project as their favorite overall for investment. Eighteen different zip codes were represented across the in-person and online polling platforms.

## **St. John the Baptist Parish**

### **Airline & Main Complete Streets**

**CDBG Funding Source:** CDBG-NDR & L-CDBG (2020)

**Primary Resilience Themes:** Stormwater Management, Transportation

**National Objective:** LMI Area Benefit

**Eligible Activities:** Acquisition of Real Property – 105(a)(1); Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2); Payment of the Non-Federal Share – 105(a)(9)



The Airline and Main Complete Streets project is a parish-owned Resilient Infrastructure and Community Nonstructural Mitigation/Flood Risk Reduction project positioned along Airline Highway in LaPlace. This project is an example of how to plan for a future of heightened flood risk in a low risk area by incorporating stormwater management strategies into public infrastructure projects that also providing residents enhanced transportation options. The proposal suggests a 1.3-mile street improvement on Airline Highway and a 0.3-mile improvement on Main Street. Funding is currently available for off-street pedestrian and cyclist paths, a green median and shade trees. This proposal adds green infrastructure components to hold and filter runoff and extends improvements to Main Street, adding new bioretention cells, sidewalks, permeable parking, native plantings and historic light poles and banners. Complete street designs like this one aim to attract reinvestment in commercial corridors, alleviate drainage systems and reduce flooding. Improved safety for pedestrians and cyclists enhance connectivity, aesthetics and urban identity. The project will provide improved connectivity and stormwater retention capabilities to the surrounding communities, of which most are LMI.

During the first round of LA SAFE meetings, the project team hosted residents of St. John the Baptist Parish at the St. John the Baptist Parish Community Center in LaPlace. At this meeting, many attendees pointed out that the quality of drainage and stormwater management infrastructure in the parish needs improvement. Specifically, residents acknowledged drainage, flooding and stormwater management as areas of opportunity a combined 41 times in a meeting with around 65 attendees. The attendees also described a lack of connectivity and transportation options, mentioning both concerns 20 times. They related the connectivity issue back to a growing traffic and congestion problem in the parish. In the second round of meetings, attendees from all over the parish again stressed the critical need for recreational space and improved stormwater detention capabilities. In meeting rounds three and four in St. John the Baptist Parish, the project team continued to work collaboratively with residents as well as parish leadership to develop a project based on the ideas presented by residents in previous rounds. Lack of proper drainage, safe multimodal transportation options and traffic congestion were recurring themes found in all rounds of meetings in St. John. As a major thoroughfare that runs through the parish, Airline Highway is an ideal location for the complete street enhancements and stormwater retention improvements recommended by parish residents. The Airline and Main Complete Streets project will directly address residents' concerns by creating better-connected, more inclusive transportation along a main artery through town. The project enjoys the support of both parish officials and residents, and it aligns with information gathered throughout the public engagement efforts of LA SAFE. The community affirmed its support of this project in person and online in the final round of meetings, when residents

representing eight different zip codes in St. John the Baptist Parish collectively chose this project as their number one preference.

## Plaquemines Parish

### Plaquemines Harbor of Refuge



**Primary Resilience Themes:** Economy & Jobs, Transportation, Culture

**National Objective:** LMI Area Benefit and Urgent Need

**CDBG Funding Source:** CDBG-NDR

**Eligible Activities:** Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2)

The Plaquemines Harbor of Refuge project is primarily a Resilient Infrastructure project located in Empire, Louisiana. Plaquemines Parish is a Sportsman’s Paradise with some of the world’s best commercial and recreational fishing. The seafood industry is one of the leading employers in Louisiana, producing millions of pounds of shrimp, oysters, crabs and fish annually. However, as flood risk increases and land loss continues to occur, this industry’s viability faces a significant threat – specifically as it relates to vital equipment and infrastructure. This proposal would create a harbor of refuge for vessels to shelter in place during disaster events. The parish-operated harbor would incorporate marina amenities, wet-and dry-docking facilities as well as green infrastructure to help manage stormwater.

During the first round of LA SAFE meetings, the project team hosted residents of Plaquemines Parish at the YMCA in Port Sulphur, Louisiana. At this meeting, attendees made numerous comments about the opportunities and challenges facing the seafood industry, local businesses and the economy at large. Attendees referenced one of these three topics a combined 77 times during this first meeting. In the second round of meetings, attendees from throughout the parish again stressed the need to improve the economic viability of the parish, especially as it relates to the seafood industry. During this first meeting, attendees also began expressing the need to expand current harboring capabilities. On tabletop maps, attendees marked potential locations for a new harbor of refuge. Through this activity, Empire was identified as a location with existing infrastructure that is not sufficient to meet the current need. In meeting rounds three and four in Plaquemines Parish, the project team continued to work collaboratively with residents as well as parish leadership to develop a project based on the ideas presented by residents in previous rounds. Through additional outreach to partners such as the Louisiana SeaGrant and Coastal Communities Consulting, it became increasingly apparent that the parish needed more harboring capacity during peacetime in addition to during disaster events. The project enjoys the support of both parish officials and residents, and it aligns with information gathered throughout the public engagement efforts

of LA SAFE. The community affirmed its support for this project in person and online in the final round of meetings, when residents collectively chose this project as their number one preference.

## Mental Health and Substance Abuse Program

### Services provided by Community C.A.R.E. Centers

These are two areas of service that Community C.A.R.E. Centers provide that would be applicable for funding under this program.

<b>Substance Abuse Center for Adolescents &amp; Adults</b> <ul style="list-style-type: none"><li>• Assessments</li><li>• Education</li><li>• Counseling</li><li>• Intensive IOP Programs</li></ul>	<b>Behavioral Health &amp; Wellness Center</b> <ul style="list-style-type: none"><li>• Individual Counseling</li><li>• Family Counseling</li><li>• Group Counseling</li><li>• Anger Management</li><li>• Mind/Body Skills training</li><li>• Play Therapy</li><li>• Child Psychiatry</li><li>• Disaster Counseling</li></ul>
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**Primary Resilience Themes:** Education, Economy and Jobs, Public Health

**National Objective:** LMI Limited Clientele

**CDBG Funding Source:** CDBG-NDR

**Eligible Activities:** Public Services – 105(a)(8)

The Mental Health and Substance Abuse Program for Plaquemines Parish is a Public Services/Education program as outlined in the LA SAFE Guidelines. Areas projected to experience high future flooding risk are, in many cases, currently experiencing significant environmental, cultural, economic and social challenges. Severe, repetitive flooding events in recent years have devastated many low-lying communities along our coast, especially in Plaquemines Parish. As these events have occurred, populations have already started moving upland, disrupting community cohesion and the coast's broader social fabric. These impacts, compounded with unfavorable future projections, have taken a significant emotional toll. This program will provide case management services for residents struggling with mental health and substance abuse issues. These services will help disadvantaged populations living in at-risk communities work through the emotional impacts of past disaster events and future increased flood risk. Plaquemines Community C.A.R.E. is an existing program that provides an array of mental health and substance abuse services to residents of Plaquemines Parish. The LA SAFE contribution will help maintain the existing programs and expand their services to their primarily LMI clientele.

During the first round of LA SAFE meetings, the project team hosted residents of Plaquemines Parish at the YMCA in Port Sulphur, Louisiana. The data gathered during this meeting clearly reveal residents' anxiety about flood risk in addition to stresses over the current and future condition of the places they call home. In the second round of meetings, in which the project team met with smaller groups of residents in more localized public settings, substance abuse and the need for mental health services were first raised as major public health challenges in the parish. During and after the third round of public meetings, resident desire for programs to help those dealing with substance abuse and mental health issues became apparent. During the third round of meetings, the project team used an anonymous polling software to ask attendees direct questions related to an array of differing topics such as flooding, land use, building regulations and mental health and substance abuse. The results of the anonymous polls indicated to the project team that mental health and substance abuse are both sensitive topics and

relevant issues in Plaquemines. When asked to give project, program and policy suggestions in the third round, residents recommended investing in programs that expand mental health services. Although this project did not emerge as the top preference in the fifth round public polling, it does have firm support from parish leadership, a Louisiana legislature representing Plaquemines and, more importantly, an established partner already providing these services in the community and eager to expand to meet growing need.

## **Jefferson Parish**

### **Gretna Resilience District Kickstart**

**Primary Resilience Themes:** Stormwater Management, Culture & Recreation

**National Objective:** LMI Area Benefit

**CDBG Funding Source:** CDBG-NDR & Katrina/Rita Grant #1 & #2

**Eligible Activities:** Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2) Payment of the Non-Federal Share – 105(a)(9)

The Gretna Resilience District Kickstart is an ambitious parish-owned Resilient Infrastructure and Community Nonstructural Mitigation/Flood Risk Reduction project. Improvements to the park include greater stormwater retention, enhanced entryways, pathways and signage, additional seating and pavilions, and the installation of a tiered dock that will connect visitors to the water. The improvements include green infrastructure features to increase storage capacity and improve conveyance of stormwater in an area with a high concentration of repetitively flooded homes and businesses in an area that is primarily LMI. In addition, the canal enhancements include the creation of recreational amenities for biking, walking and interactive community spaces.



## Louisiana Wetland Education Center (LWEC)

**Primary Resilience Themes:** Education, Economy and Jobs, Culture and Recreation

**National Objective:** Urgent Need

**CDBG Funding Source:** CDBG – NDR

**Eligible Activities:** Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2)



The Louisiana Wetland Education Center is a town-owned Public Services/Education project located on the west bank of Jefferson Parish in the town of Jean Lafitte. LA SAFE has emphasized the value of educating our coastal population about current and future environmental conditions and the effects of flood risk. The Louisiana Wetlands Education Center will be an educational asset serving students and families in the region, with programming for all ages, including a research outpost and meeting location for agencies and institutions. The Center will promote preservation, conservation and adaptation related to wetland ecosystems, using its location in the Lafitte area as an outdoor classroom. Future phases would include an expanded fishing village to teach visitors about coastal community traditions, a treetop ropes course, water taxis to Grand Isle, kayak and canoe rental and overnight cabins. The Center is complementary to the existing Lafitte Fisheries Market and adjacent to the Auditorium, Nature Trail and Multi-Purpose Facility and Museum. Under this proposal, LA SAFE would provide funding toward the Center’s construction. The facility is open to the public and free of admission.

During the first round of LA SAFE meetings, the project team hosted stakeholders of Jefferson Parish at the Alario Center in Westwego. At this meeting, residents expressed concern over the continued loss of land and wetlands as well as a lack of attractions and recreation in the parish. Meeting participants specifically mentioned challenges and opportunities relating to wetland loss, coastal education, ecotourism and recreation a combined 65 times. Residents also identified the parish’s natural resources, traditions and cultures as major strengths. In the second round of meetings, residents again stressed the need for expanded recreational opportunities and placed additional emphasis on the need for more education about the region’s environment and coastal issues, especially for children. Residents of Lafitte were particularly keen on harnessing and further developing the natural resources of the area, recommending swamp tours, environmental curriculum and environmentally oriented attractions for visitors, among others. In the third round, meeting attendees identified education as the most important issue for the future of Jefferson Parish during the snap polling activity. Between rounds three and four in Jefferson Parish, the project team continued to work collaboratively with stakeholders of the parish as well as parish leadership to develop a project based on the ideas presented by residents in previous rounds. During this engagement process, Lafitte Mayor, Timothy Kerner, brought forward the Louisiana Wetland Education Center, a project that fits squarely with the recreation and wetland education goals of parish residents. The Louisiana Wetland Education Center enjoys broad support from residents, who ranked it second in the fifth round preference polling.

## Terrebonne Parish

### Lake Boudreaux Living Mitigation

September 2018



**Primary Resilience Themes:** Stormwater Management, Culture & Recreation

**National Objective:** LMI Area Benefit

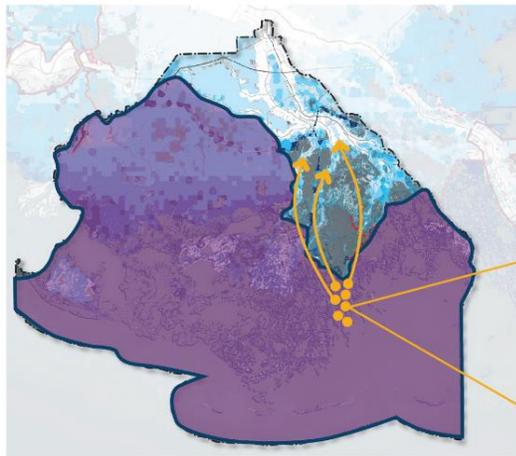
**CDBG Funding Source:** CDBG-NDR  
**Eligible Activities:** Acquisition of Real Property – 105(a)(1); Public Facilities and Improvements and Privately-Owned Utilities – 105(a)(2) Payment of the Non-Federal Share – 105(a)(9)

The Lake Boudreaux Living Mitigation project is a Resilient

Infrastructure and Community Nonstructural Mitigation/Flood Risk Reduction project that will be a model for how certain geographies think through a future with increasing flood risk. This project will operate as one of multiple lines of defense that will work together to protect the people and property of Terrebonne Parish. This project will create over 300 acres of terraces and marshland within the Morganza to the Gulf risk reduction system that will assist in reducing the impacts of storm surge. The terraces also have environmental benefits such as enhancing submerged aquatic vegetation growth, restoring habitats, and trapping suspended sediments generated by wind and wave action. This improvement will benefit the primarily LMI communities of Dulac and Grand Caillou found to the west/northwest of Lake Boudreaux.

During the first round of LA SAFE meetings, the project team hosted stakeholders of Terrebonne Parish at the Houma Terrebonne Civic Center in Houma, Louisiana. At this meeting, many attendees pointed out Terrebonne Parish's many strengths, including the fact that it is a sportsman's paradise with an abundance of natural beauty. To be more specific, approximately 40 datapoints directly relate back either to the parish as a sportsman's paradise or to the parish's natural beauty. Additionally, attendees mentioned issues of flooding, land loss and a need for environmental restoration as significant challenges to the parish over 55 times. The Lake Boudreaux project presents an opportunity to synthesize all of these challenges and opportunities into a single project that provides multiple public benefits. This project was designed in partnership with parish staff and has support from parish leadership. As a small-scale restoration and protection project that doubles as a public amenity, the Lake Boudreaux Living Mitigation project aligns closely with the public's vision for this region of Terrebonne Parish and directly addresses the opportunities and challenges residents identified throughout the LA SAFE engagement process. The project ranked number one out of the six projects presented in the fifth and final round of meetings in Terrebonne parish.

## Buyouts for Permanent Resident Households



### Buyout program for permanent residents outside of Morganza to the Gulf

Residents who accept the voluntary buyout will receive funds to relocate to higher ground within Terrebonne Parish.



**Primary Resilience Themes:** Safer Housing and Development

**National Objective:** LMI- Housing, Urgent Need

**CDBG Funding Source:** CDBG-NDR

**Eligible Activities:** Acquisition of Real Property – 105(a)(1); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Relocation – 105(a)(11); Homeownership Assistance – 105(a)(24)

The Buyouts for Permanent Resident Households program is a Resilient Housing project that seeks to relocate the relatively few homeowners still living outside of the Morganza to the Gulf structural protection system. Areas not protected by the structural protection system are projected to experience very high flood risk. In Terrebonne Parish, most permanent residents living outside of the Morganza to the Gulf are located on Isle de Jean Charles; the State of Louisiana is in the process of resettling Isle de Jean Charles residents who would like to move to higher, safer ground. The Buyouts for Permanent Resident Households program would provide relocation assistance for the few permanent households outside of Morganza who are not part of the Isle de Jean Charles resettlement program, of which there are approximately seven. This program would be reinforced with policies intended to prevent future permanent residential development outside of the Morganza alignment.

The Buyouts for Permanent Resident Households program emanated from Terrebonne Parish Government officials in consultation with local officials in down bayou locales including those areas outside of current and planned structural protection systems. Additionally, through LA SAFE's outreach and engagement efforts, citizen participants highlighted the following concepts, which would support a strategic buyout program:

- Create a system for conservation easements
- Implement regulations restricting certain forms of development in high risk areas
- Reduce economic and social risk
- Account for decreasing home values in high risk environments precluding current residents from selling and moving to higher ground
- Decrease availability of government services down bayou, so people move to higher ground where services are more readily available
- Account for populations moving upland because of increasing insurance rates

Finally, more than 80% of citizen participants agreed with a future vision for high risk environments that included fewer permanent resident households and more seasonal and workforce housing.

## Lafourche Parish

### Emerging Industry Business Incubator



This proposed project is modeled after Propeller, a business incubator in New Orleans that offers a training program for starting new businesses, as well as office space and amenities for small-business owners. The Lafourche incubator would support businesses that address: **alternative energy, coastal restoration, hospitality, and eco-tourism.**

**Primary Resilience Themes:** Education, Economy and Jobs

**National Objective:** LMI Jobs, LMI Limited Clientele

**CDBG Funding Source:** Gustav/Ike (Program Income)

**Eligible Activities:** Acquisition of Real Property – 105(a)(1); Public Facilities – 105(a)(2); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4); Provision of Public Services - 105(a)(8); Provision of assistance including loans and grants for activities which are carried out by public or private nonprofit entities – 105(a)(14); Assistance to Neighborhood Based Non-Profit Organizations- 105(a)(15); Economic Development Assistance to For-Profit Business – 105(a)(17); Microenterprise Assistance – 105(a)(22)

The Emerging Industry and Business Incubator is an Economic Development project in Lafourche Parish. Economic resilience is a cornerstone of LA SAFE. A business incubator will help launch new businesses, diversifying the economy with industries that will strengthen the region in the future. As part of the accelerator program, entrepreneurs will have access to a mentor in their field to help guide them through the program as they start their business. The incubator provides a co-working space with access to shared office equipment and a communal kitchen.

Moreover, as documented in action plans submitted following hurricanes Gustav and Ike, these twin storms severely impacted Louisiana’s overall economy and, as the fifth most impacted parish as a result of these events, specifically the economy of Lafourche Parish. Economic impact from these two storms was estimated to be \$15 billion. In isolation, these impacts are immense. However, as documented through the LA SAFE outreach and engagement process, these economic impacts have been compounded by the effect of severe repetitive natural and man-made disaster events (hurricanes Katrina, Rita, Gustav, Ike, the BP Oil spill and Isaac) as well as ongoing coastal degradation. As such, the state has identified a continued and previously unanticipated need to focus on major economic development initiatives that are primarily aimed at diversifying the economy and establishing industries and a workforce that are appropriate for the unique geographic, climatic, population and growth conditions of the state, and specifically in Lafourche Parish.

During the first round of LA SAFE meetings, the project team hosted residents of Lafourche Parish at the Mathews Government Complex in Mathews. At this meeting, residents expressed concerns over the loss

of business and industry in the parish. Attendees referenced the opportunities and challenges related to the local economy a combined 45 times during this first meeting. In the second round of meetings, attendees from throughout the parish continued to stress the need to diversify and develop the local economy. In meeting rounds three and four in Lafourche Parish, the project team continued to work collaboratively with residents as well as parish leadership to develop a project based on the ideas presented by meeting attendees in previous rounds. Data gathered through this process revealed a desire among residents to increase economic opportunity to keep local youth from leaving the parish. The Emerging Industry Business Incubator enjoys broad public support, ranking second of six projects proposed for Lafourche Parish in the fifth round of meetings.

### Resilient Housing Prototype



**Primary Resilience Themes:** Safer Housing and Development

**National Objective:** LMI Housing

**CDBG Funding Source:** CDBG-NDR

**Eligible Activities:** Acquisition of Real Property – 105(a)(1); Clearance, Rehabilitation, Reconstruction, and Construction of Buildings – 105(a)(4)

The Resilient Housing Prototype in Lafourche Parish is a Resilient Housing project that demonstrates an ideal development pattern for an area where the future flood risk is projected to remain relatively low. Areas with low flood risk are well positioned to receive population and economic growth as people retreat from higher risk locations. As populations migrate northward from south and central Lafourche Parish, medium-density, affordable residential developments should be prioritized in these receiver communities. This housing prototype will build density on a reduced footprint and will be resilient to flooding and wind damage. It will incorporate clean energy practices and conservation-minded components. Landscaping and shared green space will manage stormwater while adding beauty to the surrounding neighborhood. At least 51 percent of the units will be affordable to residents earning 20%, 30% and 50% of area median income and the remaining units may be market rate. As people move from high-risk to low-risk areas, high quality mixed-use development is a key strategy to maintain housing affordability, revitalize neighborhoods and preserve green space. This project will serve a model for resilient construction practices as Lafourche adapts to its changing future.

During the first round of LA SAFE meetings, the project team hosted stakeholders of Lafourche Parish at the Mathews Government Complex in Mathews, Louisiana. At this meeting, many attendees expressed concerns about population changes in the parish, declining home values and flood risk, noting an opportunity to plan and build for future conditions that included elevated flood risk throughout the parish. Specifically, residents mentioned population loss/movement and declining home values and tax base a combined 37 times during this first meeting. In the second round of meetings, residents continued to express interest in projects that included mixed-use development and responsible stormwater management. Residents identified Lockport as an ideal location for a new housing development due to its relatively low future flood risk compared with other locations in the parish that makes it a likely receiver community for those escaping higher risk areas. In meeting rounds three and four in Lafourche Parish the project team continued to work collaboratively with residents as well as parish leadership to develop a project based on the ideas presented by residents in previous rounds. Residents continued to suggest that development in Lafourche Parish should occur in existing communities on high ground that have existing infrastructure, such as Lockport, Thibodaux, Raceland, or Mathews. Additionally, nearly 80% of residents polled in the third round of meetings indicated that they would like to see affordable housing in their parish.

Although this project did not rise to the top during public polling that was held in December, residents ranked it fourth out of six projects.

### **2.2.2 Investment Types/Use of Funds**

OCD-DRU in collaboration with other state agencies, local governments and eligible for-profit and non-profit entities may directly implement selected projects. In the event that OCD-DRU can clearly identify capacity to implement a project the OCD-DRU may choose to push implementation down to parish partners. Emphasis will be placed on implementing each project in a timely manner to meet NDR program deadlines as established by HUD.

In order to be an effective instrument in making Louisiana more resilient, while ensuring sustainability, The Fund will exercise as much flexibility as possible when making investments in resilience projects. Therefore, The Fund may employ a variety of investment “products”, including:

- Grants;
- Loans – interest rates to be individually determined based on investment necessary from The Fund; or
- Equity Investments.

### **2.2.3 Overall Benefit to Low- and Moderate- Income Persons**

Fifty (50) percent of the CDBG-NDR funds must benefit low- and moderate-income persons. This allows up to fifty (50) percent of the CDBG-NDR funds to be used to assist activities under the urgent need or prevention or elimination of slums or blight national objectives. During the project selection process OCD-DRU will forecast the overall percentage of CDBG-NDR funds to be expended on activities meeting the low and moderate income national objective. Additional consideration will be given to projects that meet the national objective of benefiting low and moderate income persons if required to meet the overall benefit goal.

## 2.2.4 National Objectives

Each project or activity funded with CDBG-NDR funds, except for program administration and planning activities, must meet one of three national objectives. The three national objectives are:

- Benefit to low- and moderate- income (LMI) persons;
- Aid in the prevention or elimination of slums or blight; and
- Meet a need having a particular urgency (referred to as urgent need).

### *Low and Moderate Income Persons*

A project will be considered to address the objective of benefiting low and moderate income persons if it meets one of the criteria shown below. At least 50% of the CDBG-NDR funds must be expended on activities meeting the low and moderate income national objective.

**Area benefit activities** - An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low and moderate income persons (24 CFR 570.483(b)(1)).

**Limited clientele activities** - An activity which benefits a limited clientele, at least 51 percent of whom are low and moderate income persons (24 CFR 570.483(b)(2)).

**Housing activities** - An activity carried out for the purpose of providing or improving permanent residential structures that, upon completion, will be occupied by low and moderate income households (24 CFR 570.483(b)(3)).

**Job creation or retention activities** - An activity designed to create permanent jobs where at least 51 percent of the jobs, computed on a full time equivalent basis, will be held by, or will be made available to low and moderate income persons (24 CFR 570.483(b)(4)).

### *Slums or Blight*

Activities considered to aid in the prevention or elimination of slums or blight on either an area basis or spot basis (24 CFR 570.483(c)).

### *Urgent Need*

Activities designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the unit of general local government is unable to finance the activity on its own, and that other sources of funding are not available. In the context of the CDBG-NDR program, HUD has awarded funds only to programs and/or activities that documented how they respond to a disaster-related impact. As such, OCD-DRU need not issue formal certification statements to qualify an activity as meeting the urgent need national objective.

## 2.2.5 Tieback to Qualifying Disaster

All projects and programs implemented with CDBG-NDR resources must in some way respond directly or indirectly to the impact of Hurricane Isaac. Projects and programs implemented with Katrina/Rita CDBG-

DR resources must respond to impacts resulting from hurricane Katrina or Rita. Projects and programs implemented with Gustav/Ike CDBG-DR resources must respond to impacts resulting from hurricane Gustav or Ike. Each project's tie to the storm will be evaluated and documented during the Investment Phase. A project's tie to the storm can be demonstrated in a number of ways including documentation of physical damage, assessment of the impact of the disaster on the community, housing stock and/or economy or analysis of how the project will help economically revitalize the community.

### 2.2.6 Duplication of Benefits

Disaster recovery activities may be funded from a variety of both public and private sources. The Stafford Act's prohibition on duplication of benefits (DOB) in section 312 (42 U.S.C. 5155) is applicable to all CDBG disaster recovery grants. DOB occurs when financial assistance received from one source is provided for the same purpose as CDBG-NDR funds provided, in accordance with HUD DOB guidance, found at 76 FR 71060, November 16, 2011. All projects will be reviewed for potential duplication of benefits.

## 2.3 Implementation

OCD-DRU, in cooperation with local governments and other community organizations, will carry out program activities including but not limited to the procurement activities, environmental reviews, labor standards enforcement, construction management, construction activities, grants management, relocation activities, and property acquisition. As necessary, OCD-DRU will enter into a binding agreement with a local government or other eligible entity that authorizes OCD-DRU to act on behalf of the entity as needed to implement a funded project. OCD-DRU will provide grant management services and technical assistance to all grantees/sub-recipients.



### 2.3.1 Subrecipients and Grantees

For purposes of the LA SAFE program a subrecipient and/or a grantee may be a unit of local government, a public or private nonprofit agency, authority or organization, or a community-based development organization receiving CDBG funds to undertake CDBG-eligible activities (see CDBG regulations 24 CFR 570.500(c)). All selected projects will be identified through the planning process described in section 2.1 and through the Investment Selection Committee. If required, OCD-DRU will select a suitable subrecipient or grantee for a project by either direct discretionary selection or through a method of competitive selection. Prior to entering into a binding agreement with a subrecipient or grantee OCD-DRU will undertake an analysis of the capacity of the potential subrecipient to carry out CDBG activities.

A binding agreement between OCD-DRU and the subrecipient or grantee will be executed that requires the subrecipient to comply with all federal, state and local applicable requirements, as well as the roles

and responsibilities as described in 24 CFR 570.503. OCD-DRU will provide oversight of subrecipient and grantee activities and technical assistance to ensure they are performing in accordance with the terms of the agreement.

### **2.3.2 Timely Expenditure of Funds**

All funds appropriated under Public Law 113-2 must be expended by September 30, 2022. Any grant funds that have not been disbursed by September 30, 2022, will be canceled and will no longer be available for disbursement or for obligation or expenditure for any purpose. Projects are unable to meet this deadline will be ineligible for funding.

### **2.3.3 Program Income**

For purposes of the LA SAFE program, program income means gross income received by a state, a local government or a subrecipient that was generated from the use of CDBG funds (24 CFR 570.500(a) and 570.489), except that program income does not include the total amount of funds which is less than \$35,000 received in a single year, per contract with the State, that is retained by a state, local government or subrecipient. Program income also does not include amounts generated by activities both eligible and carried out by an entity under the authority of section 105(a)(15) of the Housing and Community Development Act. Generally, any program income received by a grantee or subrecipient must be returned to the OCD-DRU; however, OCD-DRU may make exceptions on a case-by-case basis.

If program income is generated by the activities carried out by a subrecipient or a grantee, then OCD-DRU will determine on a case-by-case basis whether the program income will remain with the subrecipient/grantee, subject to the terms decided upon by OCD-DRU or whether it must be returned to OCD-DRU. All program income generated through this program must be re-invested in other CDBG-eligible activities, as reviewed and approved by OCD-DRU.

If program income is returned to OCD-DRU or generated by the State through its direct activities, then the program income will be re-invested in CDBG-eligible activities.

## **3.0 DOCUMENTATION AND REGULATORY COMPLIANCE**

For comprehensive and additional information on the compliance requirements associated with projects funded through CDBG resources, please see the OCD-DRU Grantee Administrative Manual:

<http://www.doa.la.gov/Pages/ocd-dru/DRadminManual.aspx>

### **3.1 Project Record**

Upon selection for investment a comprehensive project record will be compiled for each project. The project record will provide essential information on the project that includes, but is not limited to:

- Project description;
- Eligible Activity and National Objective;
- Budget including sources and uses of funds;
- Project objectives;

- Area(s), industry(s), and/or populations served by project;
- Tieback to Qualifying Disaster;
- Duplication of benefits analysis;
- Detailed description of and proposed metrics tracking project's expected benefits;
- Timetable of project start, to completion;
- Project sustainability including responsibility for operation and maintenance;
- If required, personal and/or business competences and capabilities necessary to achieve project success and completion;
- If required, current relevant financial information, such as financial statements, and project pro-forma; and
- Documentation of commitment of all sources of funding (equity/other sources of financing).
- Other as applicable to particular project

## **3.2 Trigger of Procurement, Environmental Review and Acquisition**

After a project has been selected for funding, OCD-DRU will trigger the initiation of procurement, environmental review and if required, property acquisition.

### **3.2.1 Procurement**

At its sole discretion, OCD-DRU may elect to utilize a subrecipient to implement a project. In those instances, the subrecipient will undertake procurement actions. Under most, although not all circumstances, the grantee will procure. The decision of who to procure, whether directly or indirectly will be left to the sole discretion of the OCD-DRU.

Professional services are procured utilizing the competitive proposals method of procurement. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids.

Request for Proposals (RFPs) will be used to procure professional services except for A/E professional (design) services when the competitive proposals method is used. Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

Request for Qualifications (RFQs) are used to procure the professional (design) services of an engineering firm or architectural firm when using the competitive negotiation method. Qualification statements cannot be used to procure any other service. A selection is made based on the competitors' qualifications, subject to negotiation of fair and reasonable compensation.

For additional information on procurement, please see Section 6 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

### **3.2.2 Environmental Review**

OCD-DRU will conduct the environmental review for all projects. Every project undertaken with CDBG funds, and all activities related to that project, is subject to the provisions of the National Environmental

Policy Act of 1969 (NEPA), as well as to the HUD environmental review regulations at 24 CFR Part 58. The HUD environmental review process must be completed before any funds may be committed for program-eligible activities. No work may start on a proposed project before the environmental review process is completed, even if that work is being done using non-HUD funds.

Project activities will fall into one of the following levels of environmental review:

- Exempt activities 24 CFR 58.34;
- Categorically Excluded activities not subject to 24 CFR 58.5 (24 CFR 58.35(b));
- Categorically Excluded activities subject to 24 CFR 58.5 (24 CFR 58.35(a));
- Environmental Assessment (EA) activities (24 CFR 58.36) ; or
- Activities requiring an Environmental Impact Statement (24 CFR 58.37).

For purposes of environmental review, the term “activity” means an action that a grantee takes on as part of an assisted project, regardless of whether its costs are borne by CDBG assistance or are eligible expenses under the program. A recipient must group together and evaluate as a single project all individual activities which are related either geographically or functionally, or are logical parts of a composite of contemplated actions. For example, the aggregation of several activities carried out in one distinct neighborhood, such as housing rehabilitation, demolition, street, paving and construction of a water line would be grouped together as one project.

### *3.2.2.1 Choice Limiting Actions*

There can be no choice-limiting actions until environmental clearance is received. The concept of prohibiting “choice-limiting” actions is to prevent investing in a project before all necessary environmental clearances are obtained. Market studies, environmental studies, plan development, engineering or design costs, inspections and tests are not considered “choice-limiting” actions.

“Choice-limiting actions” are defined as any activity that would have an adverse environmental impact or limit the choice of reasonable alternatives, such as acquisition, construction, demolition of buildings, or rehabilitation or reconstruction of buildings.

A purchase option agreement on a proposed site or property prior to the completion of the environmental review is allowed if the option agreement is subject to a determination on the desirability of the property for the project after the environmental review is completed and the cost of the option is a nominal portion of the purchase price.

Per 24 CFR Part 58.22, failure to comply with the prohibition against committing funds or taking physical action (using either HUD funds or non-HUD funds) before the completion of the environmental review process could result in loss of HUD assistance, cancellation of the project, reimbursement to HUD for the amount expended, or suspension of the disbursement of funds for the affected activity.

### *3.2.2.2 Adoption of Another’s Agency’s Environmental Review*

In accordance with the Appropriations Act, recipients of Federal funds that use such funds to supplement Federal assistance provided under sections 402, 403, 404, 406, 407, or 502 of the Stafford Act may adopt,

without review or public comment, any environmental review, approval, or permit performed by a Federal agency, and such adoption shall satisfy the responsibilities of the recipient with respect to such environmental review, approval, or permit that is required by the HCD Act. If OCD-DRU adopts another agency's environmental review, OCD-DRU will notify HUD in writing of its decision and will retain a copy of the review in the activities environmental record.

In accordance with the Appropriations Act, and notwithstanding 42 U.S.C. 5304(g)(2), HUD may, upon receipt of a request for release of funds and certification, immediately approve the release of funds for an activity or Project assisted with CDBG–NDR funds if OCD-DRU has adopted an environmental review, approval or permit as described, above, or the activity or Project is categorically excluded from review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.).

For additional information on environmental review, please see Section 9 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

### **3.2.3 Acquisition and Relocation**

If the project involves the acquisition of real property, including easements, leases and donations, OCD-DRU will initiate the acquisition process including the procurement of appraisers and legal services. Depending on the end use of the property OCD-DRU may execute a binding agreement with a local entity that permits OCD-DRU to acquire property on behalf of the local entity. At its sole discretion OCD-DRU may elect to utilize a subrecipient for the acquisition of property.

Prior to acquiring real property or attempting to undertake a relocation project, a determination must be made as to whether or not the requirements of the Uniform Relocation Assistance (URA) and Real Property Acquisition Act of 1970 (as amended in 1986) apply. Requirements for acquisition and relocation activities are described in the Department of Housing and Urban Development's Handbook 1378: Real Estate Acquisition and Relocation Policy and Guidance.

Regardless of the source of funds and timing of the acquisition, any acquisition of property made in anticipation of using CDBG funds is subject to the URA.

For additional information on acquisition and relocation, please see Section 10 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

## **3.3 Project Development**

Depending on the nature of the project, OCD-DRU, in partnership with OCD-DRU's grant management consultants and partnering grantees/subrecipients will directly oversee the activities of architects, engineers, planners, consultants and other specialists. These activities will include but not be limited to:

- Preparation of studies and reports;
- Development of project plans and specifications for construction;
- Development and implementation of public services;
- Development and implementation of housing activities; and

- Development and implementation of economic development and revitalization activities.

If a subrecipient has been selected by OCD-DRU to implement the project, the subrecipient will be responsible for direct oversight of the consultants. In those instances, OCD-DRU will establish deliverables and time schedules that the subrecipient must achieve to demonstrate continued capacity to carryout program activities in a timely manner.

### **3.4 Closeout**

The project closeout is the process by which OCD-DRU determines that the project has been successfully completed. A project is deemed complete upon final review and/or inspection by OCD-DRU and, when applicable, the submission of proof that all appropriate code and permit approvals have been secured, including Certificates of Occupancy.

If a subrecipient was utilized, OCD-DRU must ensure that the requirements of the subrecipient agreement have been completed in accordance with the terms and conditions of the subrecipient agreement.

Project closeout begins when:

All project expenses to be paid with CDBG funds (except for closeout costs) have been completed and payment requested;

- Approved work has been finished;
- If applicable, any other responsibilities detailed in a subrecipient agreement or other binding agreement have been fulfilled; and
- All monitoring or audit findings have been cleared.

Conditional close-out is given when OCD-DRU receives and accepts the entire Final Project Performance Report. To receive "conditional" close-out, any outstanding audit/monitoring findings must be resolved and OCD-DRU must approve the Final Project Performance Report. OCD-DRU will issue a Final Close-Out letter upon receipt and approval of the final audit conducted in accordance with the Single Audit procedures or other financial report if OCD-DRU determines that a Single Audit is not required.

For additional information on Closeout, please see Section 13 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRadminManual.aspx>

### **3.5 Labor Standards**

OCD-DRU will be responsible for ensuring compliance with CDBG labor standards unless a subrecipient is selected to implement the project. Projects involving construction contracts in excess of \$2,000 must comply with the following laws and regulations:

- Federal Fair Labor Standards Act;
- Davis-Bacon and Related Acts;
- Copeland Anti-Kickback Act; and
- Contract Work Hours and Safety Standards Acts (CWHSSA)

Various exceptions exist to the Davis-Bacon and Related Acts and the Copeland Anti-Kickback Act. These exemptions include but are not limited to the following:

- Construction contracts at or below \$2,000. Note that arbitrarily separating a project into individual contracts below \$2,000 in order to circumvent the Davis-Bacon and Copeland Act requirements is not permitted;
- Rehabilitation or construction of residential structures containing less than eight units; or
- Contracts solely for demolition, when no Federally-funded construction is anticipated on the site.

The following steps should be taken to ensure compliance with required labor standards:

- Designate an appropriate person to act as labor compliance officer to insure compliance and to be the primary point of contact for labor standards issues;
- Determine the appropriate wage decision based on the type of construction (Building, Residential, Heavy or Highway) activities to be undertaken;
- Incorporate wage decision in bidding documents;
- Verify wage decision is still current ten (10) days prior to bid opening;
- Verify eligibility of successful bidder;
- Provide information on labor standards and payroll reporting at preconstruction conference;
- Conduct employee interviews;
- Review weekly payroll reports and resolve compliance issues;
- If required obtain additional worker classifications; and
- Complete Final Wage Compliance Report.

For additional information on labor standards, please see Section 7 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

### **3.6 Property Management**

If CDBG-NDR funds are used to acquire real property or personal property, OCD-DRU is responsible for ensuring that:

- The property continues to be used for its intended (and approved) purpose;
- Records are maintained regarding the location and condition of the property; and
- In general, if the property is sold or otherwise disposed of OCD-DRU is reimbursed for the CDBG share of the property's value.

For additional information on property management, please see Section 11 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

### **3.7 Lead Based Paint, Asbestos and Mold**

Projects involving housing must comply with Federal and State regulations regarding lead based paint, asbestos and mold. The Lead Safe Housing Rule requires different approaches to addressing lead hazards in different types of housing. The requirements include communication with residents, lead hazard

evaluation and assessment, and lead hazard reduction. All housing projects must comply with the Lead Safe Housing Rule.

HUD does not have a specific regulation related to asbestos or mold as it does for lead in the HUD Lead Safe Housing Rule. However, HUD does have a mission of decent safe and sanitary structures. Project activities must comply with Federal, State and local laws related to asbestos or mold.

### **3.8 Conflict of Interests**

Conflicts of interest between subrecipients, contractors, consultants, OCD-DRU program staff and other parties are strictly prohibited by Federal law. Generally, no person who exercises or has exercised any functions or responsibilities with respect to CDBG activities and who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

A conflict of interest means that, because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the Government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has an unfair competitive advantage. Conflicts of interest in the award and/or administration of contracts must be avoided. "No employee...of the grantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent (perceived), would be involved. Such a conflict would arise when...the employee, any member of his (her) immediate family, his or her partner...has a financial or other interest in the firm selected for award" (2 CFR 200.318). Other Federal regulations governing conflict of interest requirements are found 24 CFR 489(h). Conflicts of interest may be governed also by state law or local law or ordinance.

For additional information on conflict of interest, please see Section 6 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

### **3.9 Subrecipient Recapture Policy**

If a subrecipient is utilized, a subrecipient agreement will be executed stipulating the subrecipient's responsibilities and the potential penalties if the subrecipient is found not to have fulfilled their obligations. Specifically, if the funds are not used for eligible activities or are otherwise disbursed in violation of laws or regulations, the money can be recaptured.

### **3.10 Substantial Amendments to the Action Plan**

Per 82 FR 36812 published August 7, 2017, HUD revised parameters by which CDBG-NDR recipients may make substantial amendments to its Action Plan. These revised parameters are as follows, for which the state must receive prior HUD approval:

- Any change that would present a significant change to the state's capacity to carry out the grant;

- Any change that would undermine the state’s soundness of approach;
- Any change to Most Impacted and Distressed target area(s);
- Any change in program benefit, beneficiaries, or eligibility criteria;
- Any change in allocation or reallocation of more than 10 percent of the grant award;
- Any change to leverage pledged and approved in the state’s grant agreement;
- Any addition or deletion of an eligible activity.

Per streamlined citizen participation requirements stipulated for the submittal of substantial amendments, the state must hold one public hearing and provide a public comment period of at least 15 days prior to submittal to HUD.

### **3.11 Citizen Complaints**

Pursuant to 81 FR 36557, OCD will provide a timely written response to every citizen complaint, and as required by law will provide a response within 15 working days of the receipt of the complaint, if practicable. Complaints should be submitted via the ‘Contact Us’ portal at <https://lasafe.la.gov/contact> or directly to OCD’s Public Information Officer Janice Lovett at [Janice.lovett@la.gov](mailto:Janice.lovett@la.gov).

### **3.12 Green Building Standards**

Pursuant to 81 FR 36557, OCD will utilize appropriate green building standards for replacement and new construction of residential housing. At a minimum, units constructed or rehabilitated through the program will be ENERGY STAR certified. Developments may also meet or achieve LEED certification, FORTIFIED standards and/or SITES certification, as is practicable.

### **3.13 Green Infrastructure**

HUD encourages Grantees to implement green infrastructure policies to the extent practicable and possible. Additional tools for green infrastructure are available at the Environmental Protection Agency’s (EPA) water Web site; Indoor airPLUS Web site; Healthy Indoor Environment Protocols for Home Energy Upgrades Web site; and ENERGY STAR Web site, [www.epa.gov/greenbuilding](http://www.epa.gov/greenbuilding). OCD-DRU will work with eligible grantees and subrecipients to identify opportunities for incorporating green infrastructure practices into projects, on a case-by-case basis, and to the extent practicable.

## **4.0 MONITORING REQUIREMENTS**

OCD-DRU must ensure compliance with HUD regulations, which include but are not limited to: record keeping, administrative and financial management, environmental compliance, citizen participation, conflict of interest, procurement, labor standards, Section 3, Fair Housing, Title VI, Section 504, duplication of benefits, property management and property acquisition and relocation.

OCD-DRU has established a monitoring program administered by the Compliance and Monitoring group to ensure that all programs and projects comply with applicable Federal, State, and local regulations and effectively fulfill the goals set forth in the Action Plan and Action Plan Amendments. The monitoring program serves to identify risks, deficiencies and remedies related to programs, projects and subrecipients. The objectives of the monitoring program include:

- Determine if activities are being carried out as described in the Action Plan and Action Plan Amendments for the CDBG program and assistance;
- Determine if activities are being carried out in a timely manner;
- Determine if costs charged to the program and projects are eligible under applicable laws and CDBG regulations and reasonable in light of the services or products delivered;
- Determine if activities are being conducted with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud and abuse;
- If subrecipients are utilized, determine if the activities are being carried out in conformance with the subrecipient agreement;
- If subrecipients are utilized assess if the subrecipient has the continuing capacity to carry out the approved project;
- Identify potential problem areas and assist OCD-DRU and subrecipients in complying with applicable laws and regulations;
- Assist in resolving compliance problems through discussion, negotiation, technical assistance and training;
- Provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected and not repeated;
- Comply with the monitoring requirements of 24 CFR 570.501(b) and 2 CFR 200.328, if applicable;
- Determine if any conflicts of interest exist in the operation of the CDBG-DR program per 24 CFR 570.611; and
- Ensure that required records are maintained to demonstrate compliance with applicable regulations.

For additional information on monitoring, please see Section 12 of OCD-DRU's Grantee Administrative Manual. <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>

## **4.1 Project Monitoring**

LA SAFE projects will be monitored during the project's implementation period or within 1 year of closing by the Compliance & Monitoring group. If a subrecipient is utilized, the Compliance & Monitoring group will conduct an on-site monitoring visit of the subrecipient to review project records and documentation.

## **4.2 Monitoring Findings**

If significant monitoring findings are issued, OCD-DRU, or the subrecipient if applicable, must take corrective action to resolve the findings or provide additional information, as is required by the Compliance and Monitoring group. All significant monitoring findings must be cleared prior to project close-out.

## **4.3 Audit Requirements**

If a subrecipient is utilized by OCD-DRU, the subrecipient must comply with the following audit requirements.

In accordance with 2 CFR 200.500, a non-Federal entity expending \$750,000 or more in Federal funds must have a single or program specific audit conducted in accordance with the requirements of 2 CFR 200.501. Therefore, if a subrecipient expends more than \$750,000 in total Federal funds in a fiscal year must have an audit prepared in compliance with these requirements. The audit report should be submitted to OCD-DRU upon completion.

If a subrecipient expends less than \$750,000 in total Federal funds in a fiscal year, the subrecipient must submit one of the following types of reports:

- An annual sworn financial statement if revenue received was \$75,000 or less.
- An annual compilation of its financial statements, with or without footnotes, if revenue received was more than \$75,000 but less than \$200,000.
- An annual review of its financial statements to be accompanied by an attestation report, if revenue received was \$200,000 but less than \$750,000.
- An annual audit, if revenue received was \$750,000 or more.

Subrecipients subject to the State Audit Law (RS 24:513) must also comply with State law. In all cases, a copy of the completed statement, report or audit must be submitted to OCD-DRU.

## 4.4 Audit Findings

Subrecipients must respond in writing to OCD-DRU regarding any findings of noncompliance, control structure comments or recommendations cited by the independent CPA in his or her reports or in a report issued by the Legislative Auditor. Such response should identify each finding or comment and the action(s) that has been taken or is planned to be taken. If an action has not been taken, provide the approximate date the action will be completed, or explain why no action is believed to be required. The OCD-DRU monitoring division will review the response to determine if additional action is warranted.

## 5.0 DEFINITIONS

**National Disaster Resilience Competition (NDRC)** – A competition for approximately \$1 billion in CDBG-DR funds remaining from P.L. 113-2 to solicit cutting-edge projects addressing unmet needs from past disasters while addressing vulnerabilities putting populations in harm’s way during future disasters. The LA SAFE Fund was originally capitalized with funds awarded through the NDRC.

**100-Year Floodplain** – This term, adopted by the NFIP as the basis for mapping, insurance rating, and regulating new construction, is the floodplain that would be inundated in the event of a 100-year flood. The 100 year flood has a one percent chance of being equaled or exceeded during any given year.

**CDBG, CDBG-DR, CDBG-NDR** – CDBG means the annual Community Development Block Grant program as authorized by the Housing and Community Development Act of 1974, as amended, and its regulations as codified in 24 CFR part 570. CDBG-DR refers to grants previously made pursuant to one of several emergency supplemental CDBG appropriations, as administered by HUD under requirements published in a series of Federal Register Notices. In the abbreviation, “DR” refers to “disaster recovery.” CDBG-NDR

refers to funds awarded to the State of Louisiana following the NDRC. In the abbreviation, “NDR” refers to “national disaster resilience”.

**CDBG Funds** – CDBG funds is a defined term at 24 CFR 570.3, and includes any CDBG-DR funds and CDBG-NDR funds. The terms CDBG-DR funds and CDBG-NDR funds are terms referring grant funds made available by CDBG-DR or CDBG-NDR awards, respectively.

**Coastal Louisiana Risk Assessment (CLARA)** – A flood modeling tool developed by the Coastal Protection and Restoration Authority (CPRA), CLARA is used to evaluate potential coastal flooding damage, represented as physical property damage, aggregating flood damage results from a wide range of potential storm events to calculate the chance of flooding or damage at any given level.

**Developers** – Private individuals and entities, including profit making and nonprofit organizations, typically formed for the purpose of undertaking projects involving the development of rental or homebuyer housing developments.

**Duplication of Benefits<sup>1</sup>** – The Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) prohibits any person, business concern, or other entity from receiving financial assistance from CDBG Disaster Recovery funding with respect to any part of a loss resulting from a major disaster as to which he has already received financial assistance under any other program or from insurance or any other source.

**Grantee** – An Applicant that receives an NDRC award directly from HUD to carry out an activity to address an Unmet Recovery Need. The term Grantee does not include subrecipients. The Grantee is the sole entity that will have access to HUD’s Line of Credit Control System (LOCCS) through the Disaster Recovery Grant Reporting (DRGR) system to draw down CDBG-NDR funding. Under P.L. 113-2, although NDRC Partners may assist in carrying out CDBG-NDR projects, the Grantee remains legally and financially accountable for the use of all funds and may not delegate or contract to any other party any inherently governmental responsibilities related to management of the funds, such as oversight, policy development, and financial management.

**Household** – A household is defined as all persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single family, two (2) or more families living together, or any other group of related or unrelated persons who share living arrangements. For housing activities, the test of meeting the low to moderate income objective is based on the LMI of households.

**Low to Moderate Income (LMI) National Objective** – Activities which benefit households whose total annual gross income does not exceed 80% of Area Median Family Income (AMFI), adjusted for household size. Income eligibility will be determined and verified in accordance with 24 CFR Part 5 requirements using procedures as stated in the Technical Guide for Determining Income and Allowances, 3rd Edition

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<sup>1</sup> Guidance provided by HUD on Duplication of Benefits may be found at: <http://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf>

(HUD-1780-CPD). The most current income limits, published annually by HUD, shall be used to verify the income eligibility of each household applying for assistance at the time assistance is provided.

- *Very low*: Household's annual income is up to 30% of the area median family income, as determined by HUD, adjusted for family size.
- *Low*: Household's annual income is between 31% and 50% of the area median family income, as determined by HUD, adjusted for family size.
- *Moderate*: Household's annual income is between 51% and 80% of the area median family income, as determined by HUD, adjusted for family size.

The following four tests are used for determining whether a project primarily benefits low and moderate income persons and qualifies under the LMI national objective:

- **Area benefit activities test**: The project benefits all residents of a primarily residential area where at least 51% of the residents are persons of low and moderate income (24 CFR 570.483(b)(1)).
- **Limited clientele activities test**: The project is limited to benefiting a specific group of persons, at least 51% of whom are low and moderate income, or is limited to serving low and moderate income person only. Some activities, such as services for elderly people, are presumed to benefit lower income people though the presumption can be challenged based on the facts and circumstances of the project (24 CFR 570.483(b)(2)).
- **Housing activities test**: CDBG-DR assisted housing is occupied upon completion by low and moderate income households (24 CFR 570.483(b)(3)).
- **Jobs creation or retention activities test**: At least 51% of the jobs created or retained with CDBG-DR assistance are held by or are available to low and moderate income people ("available to" means no special education or training is necessary) (24 CFR 570.483(b)(4)).

**LA SAFE Fund Target Area** – For the purposes of the State of Louisiana's NDRC application, it defined a target area for funding eligibility to include all of Plaquemines, St. John the Baptist, Jefferson, and St. Tammany parishes as well as Census Tracts 11, 12.02, 13 and 14 in Terrebonne Parish and Census Tracts 209, 210, 211, 212, and 213 in Lafourche Parish All projects funded with CDBG-NDR awards must come from one of the above-listed target areas.

**NDRC Partner** – NDRC Partner means a unit of local government, a nonprofit entity, a private developer, a financial institution, or other entity chosen by the OCD-DRU to assist OCD-DRU in applying for funding or in carrying out a funding award or project under the NDRC NOFA, and which was referenced by OCD-DRU in its NDRC application for purposes of demonstrating additional capacity for planning, design, financing, or implementation.

**Planning Only Activities** – For purposes of CDBG-NDR activities HUD has issued a waiver permitting States to comply with the Entitlement program regulations found at 24 CFR 570.208(d)(4) when funding disaster recovery assisted planning only activities or directly administering planning activities that guide recovery. In addition, the types of planning activities that States may fund or administer are expanded to be consistent with those of entitlement communities identified at 24 CFR 570.205. These planning activities

consist of all costs of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans, including, but not limited to comprehensive plans, functional plans related to open space, floodplain management, economic development, transportation, or utilities, capital improvements programs, and the development of codes, ordinances, and regulations. Planning costs do not include engineering and design costs related to a specific activity which are eligible as part of the cost of such activity.

**Qualified Disaster** – For this funding source, a “qualified disaster” is a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) due to Hurricane Sandy and other eligible events in calendar years 2011, 2012, and 2013. Hurricane Isaac in 2012 is the State of Louisiana’s qualified disaster for CDBG-NDR funds.

**High Risk Areas** – Areas projected to experience in excess of 6 feet of flood inundation in a 100-year storm event 50 years from present day (2067), or the latest projection provided through CPRA’s CLARA modeling tool.

**Moderate Risk Areas** – Areas projected to experience between 3 feet and 6 feet of flood inundation in a 100-year storm event 50 years from present day (2067), or the latest projection provided through CPRA’s CLARA modeling tool.

**Low Risk Areas** – Areas projected to experience between 0 and 3 feet of flood inundation in a 100-year storm event 50 years from present day (2067), or the latest projection provided through CPRA’s CLARA modeling tool.

**Resilience** – The ability to anticipate, prepare for, and adapt to changing conditions and withstand, respond to, and recover rapidly from disruptions. Such disruptions may include, for example, a flooding event, a precipitous economic change, effects of long-term environmental degradation, short-term or intermittent failure or under-performance of infrastructure such as the electrical grid. Resilience describes an area’s capacity to prepare for, withstand, and recover from unpredictable shocks -minimizing impacts on people, infrastructure, environments, and economies. In practice, resilience provides a framework for guiding planning, investment, and actions in order to reduce vulnerabilities.

**Slum and Blight National Objective** – Activities which aid in the prevention or elimination of slums or blights (24 CFR 570.483(c)). Use of this National Objective is limited due to its inability to contribute towards the overall requirement for 50% of funding to benefit low to moderate- income beneficiaries. It must be justified in the application for funding and the restrictions of its use will be expressly detailed in the contract between OCD-DRU and the subrecipient. Slum and Blight activities must meet the criteria of one of the three following categories:

- Prevent or eliminate slums and blight on an area basis;
- Prevent or eliminate slum and blight on a spot basis; or
- Be in an urban renewal area

**Subrecipient** – Cities, Counties, Indian Tribes, local governmental agencies (including COGs), private non-profits (including faith-based organizations), or a for-profit entity authorized under 24 CFR 570.201(o). The definition of subrecipient does not include procured contractors providing supplies, equipment, construction, or services, and may be further restricted by Program Rules or other guidance including applications.

**Tieback** – A tie-back reasonably shows how the effects of the Qualified Disaster resulted in an Unmet Recovery Need that can be addressed by the proposed CDBG-NDR-assisted project. Or, stated in the reverse, how the proposed project reasonably “ties-back” to addressing demonstrated direct and indirect effects of the Qualified Disaster. Once the necessary tie-back is established for a project, you may design a project that addresses or satisfies an Unmet Recovery Need and also has co-benefits, such as meeting other community development objectives and economic revitalization needs, including greater resilience to negative effects of climate change. HUD has determined that generally, designing a project that improves resilience to the impacts of climate change while meeting an Unmet Recovery Need is a necessary and reasonable cost of recovery.

**Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act or URA)** – A Federal law that establishes minimum standards for Federally funded programs and projects that require the acquisition of real property (real estate) or that displace persons from their homes, businesses, or farms.

**Unmet Recovery Need** – An unmet recovery need arises from damage or another harm or negative effect directly or indirectly caused by a Qualified Disaster, that has not been met and for which no other funds are available, and that the grantee, in reviewing the information provided by the applicant, determines to be a need related to long-term recovery.

**Urgent Need National Objective** – Activities designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the unit of general local government is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became urgent within 18 months preceding the certification by the unit of general local government. (24 CFR 570.483(d)).

In the context of the CDBG-NDR program, HUD has awarded funds only to programs and/or activities that documented how they respond to a disaster-related impact. As such, OCD-DRU need not issue formal certification statements to qualify an activity as meeting the urgent need national objective. Action Plans must be amended, as necessary, to ensure that documentation is include for each Project, Program or CDBG-eligible activity undertaken with CDBG-NDR funds.