Action Plan Amendment No. 1 Community Development Block Grant Funds in response to the Great Floods of 2016

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Action Plan Amendment No. 1 for the utilization of Community Development Block Grant Funds (CDBG) in response to the Great Flood of 2016 Public Comment Period: February 1 to 15, 2017

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

Allocations, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant
Disaster Recovery Funds in Response to Disasters Occurring in 2016
The Continuing Appropriations Act, 2017 (Public Law 114-223 and 114-254)
Federal Register Docket No.
FR-5989-N-01 and FR–6012–N–01
LOUISIANA OFFICE OF COMMUNITY DEVELOPMENT, DISASTER RECOVERY UNIT

STATE OF LOUISIANA PROPOSED
ACTION PLAN AMENDMENT NO. 1
FOR THE UTILIZATION OF
COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
IN RESPONSE TO THE GREAT FLOODS OF 2016
Public Comment Period: February 1 – 15, 2017

John Bel Edwards
Governor
Billy Nungesser
Lieutenant Governor

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1. Summary of Changes

The sections below outline the State of Louisiana's plan to utilize the full amount of funding appropriated to date.

Unmet Needs
The state amended the following areas of the unmet needs from the initial Action Plan:

- In 82 FR 5591, HUD identified four additional parishes (Acadia, St. Tammany, Vermilion, and Washington). The state refreshed all charts and maps referencing most impacted and distressed areas to include the additional parishes.
- The state updated the calculation methodology for rental housing unmet needs.
- The state shifted $30,000,000 initially allocated to the Restore Louisiana Homeowner Program to the rental housing programs.
- The state included updated Small Business Administration data for both homeowners and business data in all unmet need calculations.
- The state included updated NFIP data for both homeowners and business for Disaster 4277 in all unmet need calculations.
- The state included an update on the impact of the storms on the homeless population including the Temporary Shelter Assistance population.

Method of Distribution and Connection to Unmet Needs

The state refreshed the Method of Distribution and Connection to Unmet Needs to include the updated unmet needs numbers based on the new data and the connection to the second allocation of funding.

Proposed Use of Funds

Restore Louisiana Homeowner Rehabilitation, Reconstruction and Reimbursement Program

The state provided an updated summary of the program and with the increase in funding expanded the prioritization Phases to include Phases II-VI. The state also added a methodology for ensuring the benefit cost analysis was completed to determine if a voluntary acquisition or buyout should be considered.

Restore Louisiana Rental Housing Programs

The state updated the summary of the programs, eligible activities, and expanded the budget to include the second allocation of funds.

Infill and Rehabilitation Rental Program

This program name was changed along with a change to the eligibility criteria for the program.

Multifamily Rental Gap Program

The state updated the summary of the program, the eligible applicants and the prioritization to include affordability requirements. Additionally, the state changed the maximum award to a per unit maximum award rather than a project maximum award.

Piggyback Program

The state added in a Piggyback program which will leverage CDBG-DR with low income housing tax credits (LIHTCs) or other sources to address the longer-term affordable housing recovery needs of the impacted communities.

Rapid Rehousing Program

The state added the Rapid Rehousing Program to address the needs of the homeless and persons at risk of becoming homeless by providing a combined solution of affordable housing and support services that assist displaced households in their endeavors to become self-sufficient.

Permanent Supportive Housing Services Program

The state added a Permanent Supportive Housing Program to further address the unmet needs of those experiencing homelessness and the at-risk homeless population. The model described will assist individuals in transitioning into Permanent Supportive Housing and maintaining successful, long-term tenancies.

Restore Louisiana Economic Revitalization Programs

The state updated the summary of the programs, eligible activities, and expanded the budget to include the second allocation of funds. Additionally, the state further described the tie of the impact of the Economic Revitalization Programs to meeting the unmet housing needs.

Small Business Loan and Grant Program

The state updated the Small Business Loan and Grant Program to include updated eligible activities, additional information regarding the eligibility criteria and a change in the maximum award.

Small Business Technical Assistance Program

The state updated the Small Business Loan and Grant Program to include updated eligible activities and additional information regarding the eligibility criteria.

Small Business Bridge Loan Program

The program description was updated to note that the state will not administer the program at this time.

Louisiana Farm Recovery Grant Program

To address the unmet needs of the Agricultural sector, the state has added the Louisiana Farm Recovery Grant Program. The program will assist individual farm enterprises impacted by the great floods of 2016.

FEMA Public Assistance Nonfederal Share Program

To meet the unmet infrastructure needs outlined in the Action Plan and Action Plan Amendment, the state has created the FEMA Public Assistance Nonfederal Share Match Program. This program will work with eligible entities to pay the nonfederal share cost of the disaster cleanup and recovery efforts.

Leverage of Funds

The Action Plan Amendment provides updates regarding the leverage of funding sources identified.

Citizen Participation

The Citizen Participation section provides updates to the process for the Action Plan Amendment. Additionally, as part of the outreach and consultation with local governments, the state has continued the resilient long-term recovery planning. This section reflects the additional work and efforts the state has undertaken, and demonstrates the commitment to continue efforts throughout the state.

2. Executive Summary

In 2016, Louisiana had two separate events that qualified for appropriation under Public Laws 114-223 and 114-254. The state experienced severe storms and flooding in both March (Disaster Number 4263) and August (Disaster Number 4277) 2016 – collectively referred to as the 2016 Severe Storms and Flooding – resulting in 56 of the state's 64 parishes receiving a federal disaster declaration. From the March event, more than 16,462 homes have Federal Emergency Management Agency (FEMA) Verified Loss and 5,222 renters have FEMA Verified Loss (FVL), for a total of 21,684 households. The National Weather Service designated the August flooding event that dropped an unprecedented 7 trillion gallons of rainwater in South Louisiana as a "1,000-year" rainfall event. It resulted in the flooding of more than 68,380 homes with FVL and 23,248 renters with FVL, for a total of 91,628 households. The August storm claimed 13 lives.

A. March Storm (DR-4263)

In early March 2016, a storm system brought heavy thunderstorms from west to east across most of Louisiana. In addition to wind damage, record flooding occurred along the Bogue Falaya River in Covington and Bayou Dorcheat at Lake Bistineau. Governor John Bel Edwards declared a state of emergency for several parishes and sent the National Guard to help with search-and-rescue missions.

The State of Louisiana estimates that this storm caused damage to more than 21,684 residences, forced 13,000 evacuations and 2,780 rescues, damaged another 6,143 structures, and caused numerous road closures. Road and bridge damage estimates totaled $20 million. Agricultural losses totaled approximately $15 million, with long-term impacts to farmers estimated at $80 million. In addition, more than 40,000 citizens registered for FEMA Individual Assistance (IA).

Thirty-six Louisiana parishes were declared eligible for FEMA IA: Allen, Ascension, Avoyelles, Beauregard, Bienville, Bossier, Caddo, Calcasieu, Caldwell, Catahoula, Claiborne, DeSoto, East Carroll, Franklin, Grant, Jackson, LaSalle, Lincoln, Livingston, Madison, Morehouse, Natchitoches, Ouachita, Rapides, Red River, Richland, Sabine, St. Helena, St. Tammany, Tangipahoa, Union, Vernon, Washington, Webster, West Carroll and Winn. Seven of these parishes also flooded in August: Ascension, Avoyelles, Livingston, St. Helena, St. Tammany, Tangipahoa and Washington.

B. August Storm (DR-4277)

In mid-August 2016, a slow-moving storm impacted multiple South Louisiana parishes with sustained heavy rain. In what was a 1,000-year flood, within two days more than two feet of rain was measured in some areas, causing extensive surface and river flooding. Both the Amite and Comite rivers overtopped, as well as numerous bayous, lakes and canals located within these drainage basins. Governor John Bel Edwards declared a state of emergency for several parishes and sent the National Guard to help with search-and-rescue missions.

An estimated 8,000 people were evacuated to emergency shelter sites. The American Red Cross, the state and faith-based organizations operated these sites. A state-operated medical site was established to serve individuals with medical needs. Roughly 30,000 search and rescues were performed, with 11,000 citizens sheltered at the peak of the flood.

The damage to infrastructure, businesses and homes across the southern region of the state was extensive. Large sections of state roads remained under water for extended periods. An estimated 30 state roads washed out and 1,400 bridges require inspection. Along with more than 200 highways that closed during the event, sections of Interstates 10 and 12 closed for multiple days due to floodwaters. Some stretches of I-10 remained closed for nearly a week, significantly interrupting interstate commerce.

More than 91,628 homes have documented damages to date, with the number expected to rise as FEMA registrations and inspections conclude. An estimated 31 percent of homes in the declared parishes were impacted by flooding, with only 11 percent of households in these areas carrying flood insurance. Based on current registration numbers and historic trends, it is estimated that nearly 200,000 households will apply for IA, with an estimated housing unmet need in excess of $2.7 billion.

Immediately following the August 2016 flooding event, the Louisiana Department of Economic Development partnered with Louisiana State University to conduct an assessment of economic losses resulting from the floods.

Key details are:

>> At the peak of the August event, 19,900 Louisiana businesses or roughly 20 percent of all Louisiana businesses were disrupted by the flooding event. FEMA has since referred approximately 22,000 businesses to SBA for recovery assistance.

>> A disruption of 278,500 workers or 14 percent of the Louisiana workforce occurred at the peak of the flooding event.

>> An economic loss estimated at roughly $300 million in labor productivity and $836 million in terms of value added during the period immediately surrounding the flood.

>> Approximately 6,000 businesses experienced flooding.

>> The LSU Ag Center estimates Louisiana agricultural losses of over $110 million.

Twenty-two Louisiana parishes were declared eligible for FEMA IA: Acadia, Ascension, Avoyelles, East and West Baton Rouge, East Feliciana, Evangeline, Iberia, Iberville, Jefferson Davis, Lafayette, Livingston, Pointe Coupee, St. Helena, St. James, St. Landry, St. Martin, St. Tammany, Tangipahoa, Vermilion, Washington and West Feliciana. Seven of these parishes also flooded in March: Ascension, Avoyelles, Livingston, St. Helena, St. Tammany, Tangipahoa and Washington.

C. Anticipated Unmet Needs Gap

During the October 10 Congressional Session, state government officials, including Gov. John Bel Edwards, traveled to Washington D.C. and worked collaboratively with Louisiana's Congressional Delegation to secure long-term disaster recovery resources in response to DR-4263 and DR-4277. Working with limited disaster loss unmet need information, Louisiana's delegation proposed a relief package of nearly $3.8 billion. This package focused primarily on housing needs, as the state has prioritized housing as the most urgent and pressing recovery concern following the two flooding events. Through this Action Plan, the state now presents revised unmet need estimates based on current best available data. Over time, the state will likely continue to update these estimates as additional assessments are made and more complete data become available.

Accounting for the initial appropriation of $437,800,000 and the second appropriation of $1,219,172,000 for long-term recovery purposes, the state has calculated a remaining unmet need of $5,070,928,237.

Summary of Total Unmet Needs

Category	Losses/Gaps Known	Investments	Remaining Unmet Need
Owner-Occupied Housing	$2,448,293,435		$2,448,293,435
Homeowner Rehabilitation and Reconstruction (CDBG-DR)		($1,293,693,120)	($1,293,693,120)
Rental Housing	$254,798,970		$254,798,970
In-fill and Repair Rental Program (CDBG-DR)		($45,000,000)	($45,000,000))
Multi-family Gap Program (CDBG-DR)		($45,000,000)	($45,000,000)

Piggyback Program (CDBG-DR) ($19,000,000) ($19,000,000)
Public Housing $8,539,159 ($4,492,053) $4,047,106
Homeless Assistance $5,250,232 $5,250,232
Rapid Rehousing (CDBG-DR) ($16,000,000) ($16,000,000)
PSH Support Services (CDBG-DR) ($5,000,000) ($5,000,000)
Agriculture Losses (DR-4277) $110,244,069 $110,244,069
Agriculture Losses (DR-4263) $80,285,185 $80,285,185
Business Structures $595,600,000 $595,600,000
Business Equipment $262,800,000 $262,800,000
Business Inventories $1,425,500,000 $1,425,500,000
Business Interruption Loss $836,400,000 $836,400,000
SBA Business/EIDL Loans ($160,400,000) ($160,400,000)
Small Business Program (CDBG-DR) ($51,200,000) ($51,200,000)
Small Business Technical Assistance Program (CDBG-DR) ($800,000) ($800,000)
Louisiana Farm Recovery Program ($10,000,000) ($10,000,000)
PA State Share $106,096,475 $106,096,475
FEMA PA Match Program (CDBG-DR) ($105,000,000) ($105,000,000)
HMGP State Share $92,705,885 $92,705,885
Resilience Gaps $600,000,000 $600,000,000
Totals $6,826,513,410 ($1,755,585,173) $5,070,928,237
*CDBG-DR investments are inclusive of program delivery costs.

D. Conclusion

As a result of the 2016 Severe Storms and Flooding, the State of Louisiana received two allocations (Public Law 114-223 and 114-254) of Community Development Block Grant Disaster Recovery (CDBG-DR) funding. To fulfill the requirements of this allocation, the state must submit an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs to the Department of Housing and Urban Development (HUD). Governor Edwards has designated the state Office of Community Development - Disaster Recovery Unit (OCD-DRU) as the administering agency for these recovery funds. On behalf of the State of Louisiana, OCD-DRU developed the following Action Plan to outline the proposed use of the CDBG-DR funds and eligible activities available to assist declared parishes to meet unmet housing, economic revitalization, public service, infrastructure, planning and other needs that arose as a result of these two storm events.

E. Maps

1. FEMA Impacted Parishes and Federal Declarations: DR-4263 (March 2016 floods)
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2. FEMA Impacted Parishes and Federal Declarations: DR-4277 (August 2016 floods)
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3. Army Corps of Engineers Map – August Deluge Amounts
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3. Impact and Unmet Needs Assessment

A. Background

In accordance with HUD guidance, the State of Louisiana completed the following unmet needs assessment to identify priorities for CDBG-DR funding allocated as a result of two separate significant rain and flooding events, DR-4263 in March and DR-4277 in August. Combined, these disasters affected 56 of the state's 64 parishes, with 51 parishes declared eligible for FEMA IA. The assessment below utilizes federal and state resources, including data provided by FEMA, HUD and the Small Business Administration (SBA), among other sources, to estimate unmet needs in three main categories of damage: housing, economy and infrastructure. HUD has identified the 10 most impacted parishes from these two events as Acadia, Ascension, East Baton Rouge, Lafayette, Livingston, Ouachita, St. Tammany, Tangipahoa, Vermilion and Washington. This unmet needs assessment focuses on statewide impacts, with specific sections detailing particular needs within the most impacted areas, and where relevant, smaller geographic units.

B. Housing Impact & Needs

1. Demographic Profile of the Affected Areas

More than 72 percent of the state's population is located within the 51 IA parishes affected by DR-4263 or DR-4277 floods. Of this total, 48 percent of the population residing in the 51 IA parishes is located within one of the 10 parishes identified by HUD as most impacted, including three of the state's largest metropolitan areas, Baton Rouge, Lafayette and Monroe, as well as two parishes currently experiencing significant population growth, Ascension and Livingston. It is important to note that the population residing within the 10 most impacted parishes comprises 34.84 percent of the state's total population.

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Although the affected region tends to share similar demographic trends with the state as a whole, there are several key areas (African-American population, education level, and poverty indicators) in which the data differ. Unless otherwise noted, all data cited in this section are from the Census Bureau's 2014 fiveyear estimates from the American Community Survey (ACS).

With respect to the parishes HUD has designated as most impacted, six were included in the initial allocation of CDBG-DR funding and an additional four were included in the second allocation. A breakdown of the parishes designated in each allocation is in the table below:

HUD-Designated Most Impacted Parishes

Initial Allocation	Second Allocation
Ascension	Acadia
East Baton Rouge	St. Tammany
Lafayette	Vermilion
Livingston	Washington
Ouachita	
Tangipahoa	

Of the 10 most impacted parishes, six parishes, including Ascension, East Baton Rouge, Lafayette, Livingston, Ouachita and Tangipahoa were more severely impacted than Acadia, St. Tammany, Vermilion and Washington. The initial six most impacted parishes have a slightly larger African-American population compared to the balance of state and the other IA parishes. By percentage, 32.31 percent of the population in the six most impacted parishes is African-American, which is roughly 1 percentage point more than that of the state as a whole (31.91 percent) and almost 2 percentage points more than that of the 51 IA parishes (30.67 percent). By comparison, the African American population of the additional four most impacted parishes is 15.1 percent. At the parish level, East Baton Rouge (45.20 percent) and Ouachita (37 percent) parishes have the largest proportion of African-American residents, while another most impacted parish, Livingston is only 6 percent African-American.

Within the initial six most impacted parishes, 27.74 percent of the population age 25 years or older had attained a bachelor's degree or higher. This number is roughly 5 percentage points more than both the statewide total (22.55 percent) and the 51 IA parishes (22.13 percent). Educational attainment for the additional four most impacted parishes was also higher than both the state and the 51 IA parishes (25.10 percent). This may be attributable to the presence of five major universities within the most impacted parishes. Louisiana State University (East Baton Rouge), Southern University (East Baton Rouge), the University of Louisiana at Lafayette (Lafayette), the University of Louisiana Monroe (Ouachita) and Southeastern Louisiana University (Tangipahoa) are five strategically important educational institutions as well as significant economic drivers for their regions and the state as a whole.

Of the initial six most impacted parishes, there are significant outliers worth noting in reference to educational attainment. For example, in Tangipahoa Parish 19.45 percent of the population aged 25 or older has a bachelor's degree or higher, proportionally 14.86 percentage points less than that of East Baton Rouge Parish and 8.29 percentage points less than the six most impacted parishes combined. Of the 10 most impacted parishes, East Baton Rouge had the highest proportion of population age 25 or older with a bachelor's degree or more at 34.31 percent, followed by St. Tammany Parish at 30.37 percent.

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Housing and income demographics also highlight differences between the 51 IA parishes and the state as a whole. For instance, the 51 IA parishes have a median owner-occupied housing unit value and median household income that are significantly lower than that of the state. The median value of owner-occupied housing units in the 51 IA parishes is $91,225, $49,175 less than the statewide total ($140,400). Meanwhile, the most impacted parishes collectively have a higher median owner-occupied housing unit value than the statewide total. The median owner-occupied housing unit value for the initial six most impacted parishes is $157,450, $17,050 higher than statewide. Those same parishes also have a larger proportion of renters than both the state and the other IA parishes. At 30.87 percent, the initial six most impacted parishes collectively are home to a renter population that is almost 3 percentage point higher than the other IA parishes (27.73 percent) and more than 1 percentage point higher than the statewide total (29.12 percent). Renter population for the additional four parishes is 21.7 percent.

The 51 IA parishes have a median household income of $39,347, $5,644 less than the statewide median household income of $44,991. In addition to a lower median household income, the 51 IA parishes have a per capita income that is significantly less than that of the state as a whole. The 51 IA parishes have a per capita income of $21,456, $3,319 less than the statewide per capita income of $24,775.

Poverty indicators across the affected area also deviate from statewide totals. In the initial six most impacted parishes, the proportion of people with income below the poverty line is higher than the other IA parishes or statewide totals. 27.22 percent of households in the most impacted area have incomes below the poverty line, 8.21 percentage points more than statewide totals and 7.89 more than the other IA parishes, respectively. Comparatively, 14.8 percent of households in the additional four most impacted parishes had incomes below the poverty line.

Demographic Profile

2010-2014 American Community Survey 5-Year Estimates

Louisiana 51 PDD Parishes 10 Most Impacted Parishes

Demographics Estimates % of State Estimates

% of 51

PDD Estimates % of 10 MI

TOTAL

POPULATION: 4,601,049 100.00% 3,317,519 100.00% 1,602,912 100.00%

Under 5 years 311,324 6.77% 227,206 6.85% 109,202 6.81%

65 years and over 593,807 12.91% 430,421 12.97% 191,914 11.97%

White alone 2,748,538 59.74% 2,084,305 62.83% 1,086,731 67.80%

Black or African

American alone 1,468,208 31.91% 2,084,305 30.67% 449,596 28.05%

American Indian

and Alaska Native

alone 25,498 0.55% 13,542 0.41% 4,420 0.28%

Asian alone 74,878 1.63% 41,325 1.25% 26,133 1.63%

Native Hawaiian

and Other Pacific

Islander alone 1,604 0.03% 1,147 0.03% 391 0.02%

Two or more races 64,641 1.40% 45,508 0.99% 24,929 1.56%

Hispanic or Latino 210,524 4.58% 109,878 3.31% 59,724 3.73%

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Population 16 years

and over in civilian

labor force 2,192,054 47.64% 1,555,399 46.88% 769,514 48.01%

Louisiana 51 PDD Parishes 10 Most Impacted Parishes

Housing

Demographics Estimates % of State Estimates

% of 51

PDD Estimates % of 10 MI

TOTAL HOUSING

UNITS: 1,988,460 100.00% 1,410,498 100.00% 665,392 100.00%

Average Household

Size 2.61 (X) 2.60 (X) 2.66 (X)
Owner-occupied 1,139,756 57.32% 836,710 59.32% 405,347 60.92%
Renter-occupied 579,120 29.12% 391,076 27.73% 189,930 28.54%
Median Value of
owner-occupied
housing units (in
2014 dollars) $140,400.00 (X) $ 91,225.00 (X) $143,250 (X)
Median gross rent
(in 2014 dollars) $ 786.00 (X) $ 614.25 (X) $ 759.00 (X)
TOTAL
HOUSEHOLDS: 1,718,876 100% 1,227,786 71% 595,277 89.5%
Civilian
noninstitutionalized
population without
health insurance 747,454 16.25% 527,873 15.91% 245,780 15.53%
Estimate of
noninstitutionalized
population with a
disability* 674,156 15% 495,017 15% 221,242 9.79%
Language other
than English
Spoken at Home,
Over Age of 5* 369,719 9% 221,293 7% 120,374 8%
2015 Building
Permits** 12,222 (X) 10,264 (X) 6,726 (X)
Louisiana 51 PDD Parishes 10 Most Impacted Parishes
Income/Economic
Demographics Estimates % of State Estimates
% of 51
PDD Estimates % of 10 MI
Median household
income (in 2014
dollars) $ 44,991.00 (X) $ 39,347.75 (X) $ 47,939.50 (X)
Per capita income
(in 2014 dollars) $ 24,775.00 (X) $ 21,456.25 (X) $ 24,405.50 (X)
Income in the past
12 months below
poverty level: 874,638 19.01% 641,395 19.33% 273,554 17.46%
Louisiana 51 PDD Parishes 10 Most Impacted Parishes
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Education
Demographics Estimate % of State Estimate
% of 51
PDD Estimates % of 10 MI
Population 25 years
and over: 2,932,993 100.00% 2,081,554 100.00% 1,026,485 100.00%
Less than high
school graduate 486,080 16.57% 333,637 16.03% 140,378 13.68%
High school
graduate (includes
equivalency) 991,471 33.80% 718,245 34.51% 322,095 31.38%
Some college,
associate's degree 793,996 27.07% 568,935 27.33% 284,411 27.71%

Bachelor's degree
or higher 661,446 22.55% 460,737 22.13% 268,800 26.19%
Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates
**U.S. Census Bureau, 2015 Building Permits, Reported Units,
http://censtats.census.gov/bldg/bldgprmt.shtml
TABLES: B17001, S1701, DP03, DP04, DP05

Social Vulnerability Index (SoVI)

SoVI is a tool for assessing pre-existing vulnerabilities to environmental hazards. The index is a comparative metric that facilitates the examination of differences in social vulnerability at a certain level of geography. The index, in this iteration, synthesizes 27 socioeconomic variables, which, with support from research literature, can contribute to a reduction in a community's ability to prepare for, respond to and recover from hazards. The SoVI built in this assessment is primarily derived from U.S. Census Bureau data. SoVI uses a combined assessment of 2010 U.S. Census data and the Five-Year American Community Survey (2010-2014) and pulls from the mentioned 27 individual data points across geographic boundaries to determine relative social vulnerability across any given geography and is always relative to whatever specific geography being analyzed. These 27 individual data points cut across six component groups: Class and Race, Non-Extractive (less rural) and Race, Age, Ethnicity and Race, Gender, Housing Characteristics (proportion of renters, occupants per unit, female heads of household, etc. For modeling purposes, both 2010 U.S. Census data and the Five-Year Community Survey are current until the 2020 Census is completed and released.

The SoVI created for the 51 IA parishes affected by DR-4263 or DR-4277 incorporates six general components synthesizing these 27 socioeconomic variables:

>> Class and race
>> Non-extractive (less rural)
>> Age
>> Ethnicity
>> Gender
>> Housing characteristics (persons per unit, renters, unoccupied units, female-headed households)

SoVI has high utility as a decision-support tool for emergency management. The tool shows where there is uneven capacity for preparedness and response and where resources might be used most effectively to reduce the pre-existing vulnerability. The SoVI metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners, and decision makers as a whole. It

empirically measures and visually depicts a population's inability and/or ability to adequately prepare for, respond to, and rebound from disaster events.

By coupling SoVI with other data sources, such as the IA dataset, NFIP data and SBA data, the state is capable of identifying concentrations of greatest need for additional recovery resources. The state has collaborated with its counterparts in South Carolina, who used this methodology to plan long-term recovery efforts following its 2015 flooding events, to strategize how SoVI can be an apolitical approach for distributing scarce disaster recovery dollars to provide optimal benefit to the places that were worst impacted and least able to recover on their own from this disaster.

A SoVI analysis of the 51 IA parishes indicates the areas with the highest levels of pre-existing social vulnerability are in the metropolitan areas of Alexandria, Baton Rouge, Lafayette, Lake Charles, Monroe and Shreveport. For example, there are total of 38 “high” SoVI census tracts in these six metropolitan areas, representing more than 80 percent of the 47 “high” SoVI census tracts across the total 51 IA parishes. This is significant due to large concentrations of damage found in a few of these areas, notably Baton Rouge, Lafayette and Monroe. Specifically, there are 18 “high” SoVI tracts in these three impacted metropolitan areas. The six impacted metropolitan areas also have a high proportion of “medium high” SoVI tracts. Of the 140 total “medium high” SoVI tracts in the 51 IA parishes, 119 of those census tracts, or more than 66 percent, are within these six metropolitan areas. 66 of these “medium high” SoVI tracts are located within Baton Rouge, Lafayette and Monroe.

The state will use the information from the SoVI analysis as a planning and implementation tool to ensure the most vulnerable populations are engaged in the programs. Understanding the locations of the “medium high” to “high” SoVI census tracts will equip the state's outreach team with the information needed to further engage local governments, non-profits and other stakeholders representing these areas in order to coordinate efforts and understanding as how to best serve “medium high” to “high” SoVI census tracts residents. Additionally, the state will be able to use the SoVI analysis as a tool to ensure robust engagement and participation of “medium high” to “high” SoVI census tracts through the targeted efforts of the homeowner program manager who will ensure vulnerable populations are provided the support needed to access the program. Another way in which the SoVI analysis will be deployed as a useful tool for program planning is in the state's assessment and strategy for the development of affordable housing. Using the SoVI bivariate analysis will allow the state to consider racial, ethnic and low-income concentrations in order to work to provide affordable housing in lowpoverty, non-minority and low-risk areas.

SoVI Summary:

>> Alexandria – 3 “high” SoVI tracts (6 percent of the IA parish total) and 13 “medium high” SoVI tracts (7 percent of the IA parish total).

>> Baton Rouge – 8 “high” SoVI tracts (17 percent of the IA parish total) and 38 “medium high” SoVI tracts (21 percent of the IA parish total).

>> Lafayette – 5 “high” SoVI tracts (11 percent of the IA parish total) and 16 “medium high” SoVI tracts (9 percent of the IA parish total).

>> Lake Charles – 2 “high” SoVI tracts (1 percent of the IA parish total) and 14 “medium high” SoVI tracts (8 percent of the IA parish total).

>> Monroe – 5 “high” SoVI tracts (11 percent of the IA parish total) and 12 “medium high” SoVI tracts (7 percent of the IA parish total).

>> Shreveport – 15 “high” SoVI tracts (32 percent of the IA parish total) and 26 “medium high” SoVI tracts (14 percent of the IA parish total).

>> There are a total of 710 census tracts in the 51 IA parishes.

>> There are 47 “high” SoVI tracts in the 51 IA parishes.

>> There are 180 “medium high” SoVI tracts in the 51 IA parishes.

Housing Affordability

The state is specifically concerned about housing affordability and the high proportion of households statewide and in the affected area considered to be “cost burdened.” The standard measurement of rental unaffordability considers any household that spends more than 30 percent of its pre-tax income on housing as having an affordability problem. Housing is considered “affordable” if the rent (including utilities) is no more than 30 percent of its pre-tax income. Households spending more than 30 percent are “cost burdened” or “rent-stressed,” and those spending more than 50 percent are labeled “severely cost burdened” or “severely rent-stressed.”

In a recent report released by the National Low Income Housing Coalition (NLIHC), in no state can a minimum wage worker afford a two-bedroom rental unit at the average fair market rent, working a standard 40-hour work week, without paying more than 30 percent of their income for housing. The minimum wage in Louisiana is $7.25 per hour; however a household must earn $15.81 per hour to avoid

paying more than 30 percent of income on housing (and utilities) to afford a 2-bedroom unit at the fair market rent of $822 per month.

According to ACS data, 46 percent of Louisiana renters and 21 percent of homeowners are cost burdened, while 25 percent of renters and 9 percent of homeowners are severely cost burdened. In total, 501,610 households statewide are cost burdened and 241,725 are severely cost burdened.

Within the 51 IA parishes, a similar percentage of renters experience cost burden (45 percent) or severe cost burden (23 percent) as compared to the state overall. Similarly, a comparable percentage of homeowners are cost burdened (19 percent) or severely cost burdened (8 percent) compared to the state overall. In total, 337,380 households in IA parishes are cost burdened, and 157,187 are severely cost burdened.

By comparison, renters in the 10 ten most impacted parishes experience cost burden (47 percent) and severe cost burden (25 percent) at slightly higher rates than the state or IA areas overall. Homeowners within the most impacted parishes experience similar levels of cost burden (21 percent) and severe cost burden (8 percent) compared to the IA parishes and state overall. In total, 173,139 households in the most impacted parishes are cost burdened, and 81,522 are severely cost burdened.

Cost Burdened Renters and Owners

	State of Louisiana	Presidentially Declared Disaster Areas	10 Most Impacted Parishes
Cost Burdened Renters	267,146	174,938	88,921
Percent of Renters with Cost Burden	46%	45%	47%
Severe Cost Burden Renters	144,224	91,611	48,308
Percent of Renters with Severe Cost Burden	25%	23%	25%
Cost Burdened Owners	234,464	162,442	84,218
Percent of Homeowners with Cost Burden	21%	19%	21%
Severely Cost Burdened Owners	97,501	65,576	33,214
Percent of Homeowners with Severe Cost Burden	9%	8%	8%

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates
Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in the Past 12 Months for Owner Occupied Housing
Gross Rent as a Percentage of Household Income in the Past 12 months

Note: Cost Burden is defined as renter or owner households spending over 30 percent of household income on rent or mortgage.

2. Statewide Housing Damage and Loss Assessment

To articulate the extent of damage, the state compiled information to document damages across several different population stratifications, including owner-occupied and renter households, households without flood insurance, households located outside of the Special Flood Hazard Area (SFHA), households within the six most impacted parishes, Low and Moderate Income (LMI) households, households with Access and Functional Needs (AFN) and households with applicants aged 62 and older.

For the purposes of this analysis, the state used full applicant-level data collected through FEMA's IA program. DR-4263 IA data were pulled on Nov. 10, 2016 and DR-4277 IA data were pulled on Nov. 3, 2016. Unless otherwise noted, all housing summary data were compiled from these two datasets.

Furthermore, unless otherwise specifically noted, the state has defaulted to HUD's definitions of unmet need for owner-occupied and renter households. For rental properties, to meet the statutory requirement of “most impacted,” homes are determined to have a high level of damage if they have damage of "majorlow"
or higher. That is, they have a FEMA personal property damage assessment of $2,000 or greater or flooding over 1 foot. Furthermore, landlords were presumed to have adequate insurance coverage unless the unit is occupied by a renter with income of $20,000 or less. Units occupied by a tenant with income less than $20,000 were used to calculate likely unmet needs for affordable rental housing.

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

>> Minor-Low: Less than $1,000 of FEMA inspected personal property damage
>> Minor-High: $1,000 to $1,999 of FEMA inspected personal property damage
>> Major-Low: $2,000 to $3,499 of FEMA inspected personal property damage or more than 1 foot of flooding on the first floor.
>> Major-High: $3,500 to $7,499 of FEMA inspected personal property damage or 4 to 6 feet of

flooding on the first floor.
>> Severe: Greater than $7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.
To calculate the level of damage for owner-occupied households, the state used the following criteria:
>> Minor-Low: Less than $3,000 of FEMA inspected real property damage
>> Minor-High: $3,000 to $7,999 of FEMA inspected real property damage
>> Major-Low: $8,000 to $14,999 of FEMA inspected real property damage and/or more than 1 foot of flooding on the first floor.
>> Major-High: $15,000 to $28,800 of FEMA inspected real property damage and/or 4 to 6 feet of flooding on the first floor.
>> Severe: Greater than $28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.
The average cost for full home repair to code for a specific disaster within each of the damage categories noted above is calculated using the average real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for 2011 to 2013 disasters. Because SBA inspects for full repair costs, it presumes to reflect the full cost to repair the home, which is generally more than FEMA estimates on the cost to make the home habitable.
For each household determined to have unmet housing needs, their estimated average unmet housing need less assumed assistance from FEMA, SBA, and Insurance was calculated at $27,455 for major damage (low); $45,688 for major damage (high); and $59,493 for severe damage. Unless otherwise noted, when quoting an estimated total for unmet housing need, the state has relied on these estimates to calculate a specific dollar amount. Data is not currently available from HUD respective to estimated needs at the minor-high and minor-low categories.
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Owner-Occupied Households Estimated Unmet Need Baseline

Damage Category	Estimated Needs
Severe	$ 59,493
Major-High	$ 45,688
Major-Low	$ 27,455
Minor-High	$ -
Minor-Low	$ -

The state reserves the right to revisit this methodology, once it has conducted its own analysis specific to DR-4263 and DR-4277 comparing damages documented through FEMA's real property inspections, inspections conducted in response to claims made to the National Flood Insurance Program (NFIP) and inspections conducted for the purposes of the SBA disaster loan program. Additionally, the state intends to use real-time unmet needs assessments gathered through its own program intake and inspection process to further inform this analysis over time.
Total Impact (Owner-Occupied and Renter Households)
The information below outlines the total household population with documented damages. For the purposes of this analysis, the state has concluded a household has documented damage if FEMA reported a FEMA FVL of greater than $0. Across both disasters, 113,312 households were found to have some level of documented damage, including 84,842 owner-occupied and 28,470 renter households. While the majority of instances of housing damage can be attributed to DR-4277 (91,628 of 113,312, or 81 percent), the state is aware this is at least partially attributable to the fact DR-4277 generally affected larger population centers like Lafayette and metropolitan Baton Rouge, while DR-4263 generally affected more rural parishes and communities.
While these data validate HUD's identification of the ten most impacted parishes, the state is also concerned about levels of damage in several parishes just below this most impacted threshold, specifically Iberia, Morehouse, St. Landry and St. Martin, parishes. The map below includes all documented instances of housing damage, irrespective of the level of damage.
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Households with Damage

Disaster	Parish	Owners	Renters	Total
4263	Ouachita	3,449	2,684	6,133
	Tangipahoa	2,378	769	3,147
	Washington	1,133	303	1,436
	Morehouse	1,021	290	1,311
	St. Tammany	933	178	1,111
	Caddo	594	120	714
	Bossier	612	78	690
	Natchitoches	613	76	689
	Richland	451	147	598
	Webster	533	50	583
	Livingston	453	72	525
	Union	412	33	445
	West Carroll	351	31	382
	St. Helena	342	25	367
	Vernon	320	34	354
	Calcasieu	286	38	324

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Households with Damage

Disaster	Parish	Owners	Renters	Total
	Grant	296	27	323
	East Carroll	241	53	294
	Bienville	214	17	231
	Claiborne	203	23	226
	Winn	183	33	216
	Lincoln	156	17	173
	Rapides	151	21	172
	De Soto	145	14	159
	Caldwell	148	9	157
	Beauregard	127	17	144
	Ascension	109	21	130
	Sabine	102	2	104
	Madison	86	16	102
	Allen	77	6	83
	LaSalle	76	7	83
	Jackson	73	4	77
	Catahoula	74	1	75
	Franklin	62	3	65
	Red River	46	3	49
	Avoyelles	12	-	12
	Total	16,462	5,222	21,684
4277	East Baton Rouge	24,255	12,683	36,938
	Livingston	15,972	4,746	20,718
	Ascension	6,395	1,438	7,833
	Tangipahoa	4,655	1,104	5,759
	Lafayette	4,798	852	5,650
	Vermilion	1,819	360	2,179
	Acadia	1,555	445	2,000
	St. Landry	1,600	398	1,998
	Iberia	1,466	400	1,866
	St. Martin	1,339	120	1,459
	St. Helena	922	105	1,027
	East Feliciana	653	102	755

Evangeline 531 142 673
Jefferson Davis 507 62 569
Pointe Coupee 451 100 551
Iberville 356 39 395
Avoyelles 262 75 337
St. Tammany 216 18 234
Washington 199 28 227

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Households with Damage

Disaster Parish Owners Renters Total
West Feliciana 160 11 171
St. James 159 10 169
West Baton Rouge 107 10 117
Calcasieu 2 - 2
Rapides 1 - 1
Total 68,380 23,248 91,628
Grand Total 84,842 28,470 113,312

Impact on Owner-Occupied Households

By far, the greatest number of instances of significant owner-occupied housing damage occurred in the Baton Rouge Capital Region, specifically in East Baton Rouge, Livingston, Ascension and Tangipahoa parishes. Other population centers around Monroe (Ouachita Parish) and Lafayette (Lafayette Parish) also experienced significant owner-occupied housing damages. Finally, the state is mindful of two additional pockets of significant damage along the Sabine River, in Calcasieu and Vernon parishes, respectively.

For the purposes of this section, the state includes all documented damages to the owner-occupied household population at all levels of damage in tabular format. For mapping purposes, this analysis only includes those households with "major-low," "major-high" and "severe" levels of damage at the census tract. This map illustrates those housing units with significant and likely unmet needs.

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Owner-Occupied Households with Damage

Disaster Damage Category Households
4263 Severe 675
Major-High 2,276
Major-Low 3,979
Minor-High 1,503
Minor-Low 8,029
Total 16,462
4277 Severe 11,249
Major-High 24,270
Major-Low 15,182
Minor-High 3,849
Minor-Low 13,830
Total 68,380
Grand Total 84,842

This analysis generally assumes areas with greatest need are going to be those that have both high concentrations of damage as well as a high level of pre-existing social vulnerability. Utilizing this bivariate approach identifies specific corridors of concern. For owner-occupied household populations, a concentration of need is found in corridors throughout the Baton Rouge Capital Region. There are a total of six census tracts in the 51 IA declared parishes classified as having high levels of damage as well as high levels of social vulnerability. All six of these census tracts are located within the Capital Region. Five of the census tracts are located within East Baton Rouge Parish, specifically, and one is located in Livingston Parish. These census tracts are all within a five-mile area and five of the six census tracts are located in a line along the I-12/Florida Boulevard corridor that runs between Baton Rouge and Denham Springs. The state will note these particular areas of interest as it conducts programmatic outreach and intake.

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Owner-Occupied Households with Damage (SoVI Designation)
Disaster SoVI (5-Class) Households
4263 High 659
Medium-High 4,122
Medium 3,743
Medium-Low 7,515
Low 423
Total 16,462
4277 High 895
Medium-High 10,335
Medium 18,994
Medium-Low 32,424
Low 5,732
Total 68,380
Grand Total 84,842
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Of particular concern is the high proportion of owner-occupied households with damage who did not report carrying insurance through the National Flood Insurance Program (NFIP). In total, 72 percent of all impacted owner-occupied households, or 61,069, did not report having insurance. This represents a unique situation for the state, as in previous significant disaster events – hurricanes Katrina, Rita, Gustav, Ike and Isaac - there was a reasonable anticipation some damages may have been attributable to wind or other events that may have been covered by a homeowner's hazard insurance policy. As these events were flood-exclusive, the state has no such reasonable anticipation any of the losses incurred by this population were met by other insurance policies.
Additionally, it is important to note the high instances of owner-occupied households with significant levels of damage who were uninsured. 36,510 households of the 61,069 uninsured total had damage levels of “major-low,” “major-high” or “severe,” accounting for more than 59 percent of the affected and uninsured owner-occupied population.
Owner-Occupied Households with No Flood Insurance
Disaster Damage Category Households Percent of Total Damaged
4263 Severe 481 71%
Major-High 1,448 64%
Major-Low 3,079 77%
Minor-High 1,258 84%
Minor-Low 7,563 94%
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Owner-Occupied Households with No Flood Insurance
Disaster Damage Category Households Percent of Total Damaged
Total 13,829 84%
4277 Severe 6,071 54%
Major-High 14,470 60%
Major-Low 10,961 72%
Minor-High 3,130 81%
Minor-Low 12,608 91%
Total 47,240 69%
Grand Total 61,069 72%
To drilldown on affected owner-occupied populations in the ten-parish most impacted area, the state prepared the following detailed maps illustrating instances of owner-occupied household damages at the census tract. As the state conducts housing program intake, it will attempt to coordinate outreach efforts in accordance with locales with high-levels of documented damages.
It is important to note 68,319 of the total 84,842 owner-occupied households with damage are located within the ten-parish most impacted area, representing more than 81 percent of the total. Additionally,

51,742 households within that population are likely to have unmet needs, with damage levels at “majorlow,” “major-high” or “severe.” This population represents more than 90 percent of the 57,631 affected owner-occupied households likely to have unmet needs.

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Represents households with “major-low,” “major-high” and “severe” levels of damage.

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Represents households with “major-low,” “major-high” and “severe” levels of damage.

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Owner-Occupied Households in 10 Most Impacted Parishes

Disaster Damage Category Households

4263 Severe 226

Major-High 1,339

Major-Low 2,297

Minor-High 906

Minor-Low 3,687

Total 8,455

4277 Severe 11,107

Major-High 23,657

Major-Low 13,116

Minor-High 3,075

Minor-Low 8,909

Total 59,864

Grand Total 68,319

Represents households with “major-low,” “major-high” and “severe” levels of damage.

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The rainfall events associated with DR-4263 and DR-4277 were each considered to be, in some areas, “one in 1,000 year” events, or events with an annual expected occurrence rate of 0.001 percent. As a result, an unusually high proportion of affected owner-occupied households were located outside of the 100-year floodplain, or the Special Flood Hazard Area (SFHA). Accordingly, these households were not required to carry flood insurance if they had a mortgage. Combined with the high proportion of affected households without flood insurance, the state believes these factors have exacerbated housing unmet needs relative to past disasters.

Specifically, 46,016 impacted owner-occupied households were located outside of the SFHA, representing more than 54 percent of the total affected owner-occupied household population. Additionally, 24,615 of these households are likely to have unmet housing needs, with damage levels of “major-low,” “majorhigh” or “severe.” This represents more than 42 percent of the owner-occupied population likely to have unmet needs.

Owner-Occupied Households Outside SFHA

Disaster Damage Category Households

4263 Severe 292

Major-High 1,043

Major-Low 2,116

Minor-High 1,031

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Minor-Low 6,800

Total 11,282

4277 Severe 2,896

Major-High 10,395

Major-Low 7,873

Minor-High 2,513

Minor-Low 11,057

Total 34,734

Grand Total 46,016

Given HUD requirements associated with this CDBG-DR allocation, the state must expend at least 70 percent of its allocation toward the benefit of LMI populations. 43,643 affected owner-occupied households are LMI, or more than 51 percent of the total affected owner-occupied population. Additionally, only 25,157 of this total are households expected to have remaining unmet needs (based on HUD's methodology), with damage levels of "major-low," "major-high" or "severe." This represents approximately 43 percent of the affected population likely to have remaining unmet needs. As such, if the state receives substantially greater resources, in addition to the $1.6 billion already allocated by Congress, to address unmet needs in a more comprehensive fashion, it anticipates it may face a challenge in meeting its requirement to expend at least 70 percent of its CDBG-DR allocation toward the benefit of LMI populations.

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LMI Owner-Occupied Households

Disaster	Damage Category	Households
4263	Severe	282
	Major-High	999
	Major-Low	2,293
	Minor-High	909
	Minor-Low	5,934
	Total	10,417
4277	Severe	4,088
	Major-High	9,495
	Major-Low	8,000
	Minor-High	2,116
	Minor-Low	9,527
	Total	33,226
Grand Total		43,643

As the state attempts to prioritize the expenditure of CDBG-DR resources that are dwarfed by the total anticipated unmet needs from DR-4263 and DR-4277, one area of prioritization will be elderly households as it conducts program intake. There are at least 26,783 households with members aged 62 or older in

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the impacted owner-occupied population, accounting for the limitation that IA data only includes date of birth for the applicant representing the entire household. Using this figure as a baseline, however, at least 31 percent of the affected owner-occupied household population has a member that is 62 or older. Isolating just those households likely to have unmet needs, at least 18,997 have a household member aged 62 or older. This is at least 32 percent of the owner-occupied household population likely to have unmet needs.

Owner-Occupied Households with Applicant Aged 62+

Disaster	Damage Category	Households
4263	Severe	262
	Major-High	927
	Major-Low	1,363
	Minor-High	478
	Minor-Low	2,491
	Total	5,521
4277	Severe	4,069
	Major-High	8,132
	Major-Low	4,244
	Minor-High	1,139
	Minor-Low	3,678
	Total	21,262
Grand Total		26,783

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In addition to those households with a member aged 62 or older, the state will also prioritize those households with persons with disabilities, as identified initially by those households that indicated they had access and/or functional needs through their IA applications. According to the FEMA data, there are 2,590 owner-occupied households with documented access and/or functional needs, representing more than 3 percent of the total impacted owner-occupied household population. 1,900 of these households have levels of damage indicating they likely have remaining unmet needs, accounting for more than 3 percent of the total owner-occupied household population likely to have unmet needs.

Owner-Occupied Households with Access/Functional Needs

Disaster	Damage Category	Households
4263	Severe	28
	Major-High	77
	Major-Low	108
	Minor-High	33
	Minor-Low	176
	Total	422
4277	Severe	474
	Major-High	835
	Major-Low	378
	Minor-High	95
	Minor-Low	386

	Total	2,168
Grand Total		2,590

Impact on Renter Households

The greatest number of instances of renter household damages occurred in Ouachita (DR-4263), East Baton Rouge and Livingston (both DR-4277) parishes. Other parishes with significant impacts to renter populations include Ascension and Tangipahoa parishes.

For the purposes of this section, the state has included all documented damages to the renter household population at all levels of damage in tabular format. For mapping purposes, this analysis only includes those households with “major-low,” “major-high” and “severe” levels of damage.

Renter Households with Damage

Disaster	Damage Category	Households
4263	Severe	279
	Major-High	1,204
	Major-Low	1,309
	Minor-High	876
	Minor-Low	1,554
	Total	5,222
4277	Severe	3,838
	Major-High	8,097
	Major-Low	6,182
	Minor-High	1,818

	Minor-Low	3,313
	Total	23,248
Grand Total		28,470

This analysis generally assumes areas with greatest need are going to be those that have both high concentrations of damage as well as a high level of pre-existing social vulnerability. Utilizing a bivariate approach for rental household populations and SoVI census tracts, the Baton Rouge Capital Region and the Monroe metropolitan area have large concentrations of damage as well as areas with notably high levels of social vulnerability. In the Capital Region, there are a total of nine census tracts (8 in East Baton Rouge and 1 in Livingston) classified as having high levels of both damage and social vulnerability. Most of these census tracts are located within a five-mile area in a line along the I-12/Florida Boulevard corridor that runs between Baton Rouge and Denham Springs; however, there are two census tracts meeting these characteristics in northern Baton Rouge. Both are located south of the Baton Rouge Metropolitan Airport, one of which is in a neighborhood west of Howell Park and the other is located west of Airline Highway between the Airline Highway and I-110 and the Airline Highway and Prescott Road intersections.

In the Monroe metropolitan area, there are five total census tracts classified as having both high concentrations of rental household damage as well as high levels of social vulnerability. Three of these census tracts are within a three-mile area. These tracts run north and south along Highway 165 from south of the University of Louisiana Monroe at the intersection of Martin Luther King Jr. Drive (Highway 165) and DeSiard Street down to Richwood. The other two census tracts are outliers, but still within six miles of each other. One of the outliers is located between Glenwood Regional Medical Center and the Ouachita River. For reference, West Monroe High School is roughly the center point of this census tract. The second outlier is located north of the University of Louisiana Monroe. It is bounded by Sterlington Road (Highway 165) to the west, Chauvin Bayou to the south, and the winding Bayou DeSiard to the north, northeast, and east. The state will note these particular areas of interest as it conducts programmatic outreach and intake.

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Renter Households with Damage (SoVI Designation)

Disaster SoVI (5-Class) Households

4263 High 555

Medium-High 2,343

Medium 1,076

Medium-Low 1,193

Low 55

Total 5,222

4277 High 659

Medium-High 6,543

Medium 6,973

Medium-Low 8,066

Low 1,009

Total 23,250

Grand Total 28,472

To drilldown on affected renter populations in the 10-parish most impacted area, the state has prepared the following detailed maps illustrating instances of renter household damages at the census tract level.

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As the state conducts housing program intake, it will attempt to coordinate outreach efforts in accordance with locales with high-levels of documented damages.

It is important to note 25,701 of the total 28,470 renter households with damage are located within the 10-parish most impacted area, representing more than 90 percent of the total.

Represents households with “major-low,” “major-high” and “severe” levels of damage.

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Represents households with “major-low,” “major-high” and “severe” levels of damage.

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Renter Households in 10 Most Impacted Parishes

Disaster Damage Category Households

4263 Severe 214

Major-High 968

Major-Low 1,061

Minor-High 697

Minor-Low 1,087

Total 4,027

4277 Severe 3,778

Major-High 7,895

Major-Low 5,801

Minor-High 1,508

Minor-Low 2,692
Total 21,674
Grand Total 25,701
Represents households with “major-low,” “major-high” and “severe” levels of damage.
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Like the owner-occupied household population, an unusually high proportion of affected renter households were located outside of a Special Flood Hazard Area (SFHA). As such, while this may not inherently indicate exacerbated need for the renter population itself, it may indicate an enhanced need for landlords who may not have carried flood insurance. Furthermore, as has been discussed previously, there was a lack of affordable housing stock prior to the 2016 flooding events. The impacts described below have further exacerbated the need for an increase in affordable housing options across the state. Specifically, 12,921 impacted renter households were located outside of the SFHA, representing more than 45 percent of the total affected renter household population.
Renter Households Outside SFHA
Disaster Damage Category Households
4263 Severe 119
Major-High 532
Major-Low 619
Minor-High 541
Minor-Low 1,160
Total 2,971
4277 Severe 940
Major-High 2,802
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Renter Households Outside SFHA
Disaster Damage Category Households
Major-Low 2,728
Minor-High 1,148
Minor-Low 2,332
Total 9,950
Grand Total 12,921
Per HUD requirements associated with this CDBG-DR allocation, the state must expend at least 70 percent of its allocation toward the benefit of LMI populations. 21,806 affected renter households are LMI, or more than 76 percent of the total affected renter population.
LMI Renter Households
Disaster Damage Category Households
4263 Severe 205
Major-High 916
Major-Low 1,037
Minor-High 737
Minor-Low 1,350
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LMI Renter Households
Disaster Damage Category Households
Total 4,245
4277 Severe 2,850
Major-High 5,822
Major-Low 4,717
Minor-High 1,441
Minor-Low 2,731
Total 17,561
Grand Total 21,806
As the state prioritizes the expenditure of CDBG-DR resources that are dwarfed by the total anticipated

unmet needs from DR-4263 and DR-4277, it may prioritize elderly households as it conducts program intake. There are at least 2,642 households with applicants aged 62 or older in the impacted renter population, accounting for the limitation that IA data only includes data of birth for the applicant representing the entire household. Using this figure as a baseline, however, at least 9 percent of the affected renter household population has a member that is 62 or older.

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Renter Households with Applicant Aged 62+

Disaster	Damage Category	Households
4263	Severe	15
	Major-High	121
	Major-Low	130
	Minor-High	76
	Minor-Low	117
	Total	459
4277	Severe	265
	Major-High	951
	Major-Low	575
	Minor-High	146
	Minor-Low	246
	Total	2,183
Grand Total		2,642

In addition to those elderly households, the state may also prioritize those populations with access and/or functional needs to prioritize how it will assist the affected population. There are 1,268 renter households with documented access and/or functional needs, representing more than 4 percent of the total impacted renter household population.

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Renter Households with Access/Functional Needs

Disaster	Damage Category	Households
4263	Severe	12
	Major-High	54
	Major-Low	57
	Minor-High	38
	Minor-Low	55
	Total	216
4277	Severe	197
	Major-High	407
	Major-Low	233
	Minor-High	70
	Minor-Low	145
	Total	1,052
Grand Total		1,268

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Impact on Public Housing Authorities

The Louisiana Housing Corporation (LHC), in conjunction with HUD's New Orleans Field office, has remained in constant contact with Public Housing Authorities (PHAs) throughout the impacted area. In total, 13 of the state's 102 PHAs reported some disaster impact, impacting 132 households and displacing 95 households. Additionally, 16 Housing Choice Voucher (HCV) properties were affected, impacting 864 households and displacing 850 households.

Public Housing Assessment (Statewide)

	Public Housing	Housing Choice Vouchers	Total
Total Properties/PHAs	102	91	193
Units	19,988	54,357	74,345
Properties/PHAs Impacted	13	16	29

Households Impacted 132 864 996
Households Displaced 95 850 945

HUD's New Orleans Field office provided an update relative to PHA damages and unmet needs on Jan. 17, 2017 (see table below). The state is committed to continued coordination with PHAs, particularly with respect to assessing the unmet repair and rebuilding needs not otherwise covered by insurance or FEMA. In addition, the state is committed to working with PHAs to develop and implement measures that will make their units more resilient in the wake of future storms. With an understanding that many of the individuals who reside in subsidized housing represent the most vulnerable residents of our state, it is of the utmost importance to ensure that impacted PHAs are provided the tools and resources they need to rebuild effectively and sustainably.

Seven multifamily public housing developments reported damage attributable to DR-4263 or DR-4277. These facilities hold 619 total units, of which 300 were damaged. Two facilities, Livingston Manor and Charleston Oaks, suffered damage to all of their units, while a third development, Tangi Village, suffered damage to all but four units. Tangi Village, in particular, is notable as it was impacted by both disaster

HA Name	Insurance Award	FEMA Award	CFP Reallocated Funds	Operating Funds Available	COCC Damages	Public Housing Damages	PH Relocation Costs	Additional Funds Needed	Months to Complete Mod
Eunice	$0	$0	$162,263	$750,000	$0	$2,297,500	$34,000	$1,419,237	24
New Iberia	$0	$0	$0	$0	$0	$213,380	$0	$213,380	
Rayne	$0	$0	$0	$75,000	$0	$75,000	$2,000	$2,000	5
Crowley	$73,864	$0	$0	$0	$0	$71,800	$0	$0	4
Ville Platte	$0	$77,000	$0	$0	$0	$56,000	$1,619	$0	3
Welsh	$0	$0	$0	$0	$0	$20	$0	$20	0
Lake Arthur	$33,610	$0	$0	$0	$0	$44,937	$0	$11,327	
Donaldsonville	$0	$0	$26,858	$0	$0	$203,000	$0	$176,142	60
Erath	$455,027	$0	$0	$0	$0	$406,903	$0	$0	5
Opelousas	$0	$0	$0	$0	$0	$0	$0	$0	
Denham Springs	$2,900,000	$0	$0	$0	$265,000	$4,770,000	$0	$2,135,000	15
Jennings	$0	$0	$8,000	$0	$0	$98,000	$0	$90,000	
Duson	$0	$0	$0	$0	$0	$0	$0	$0	

Totals $3,462,501 $77,000 $197,121 $825,000 $265,000 $8,236,540 $37,619 $4,047,106
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events (DR-4263 and DR-4277). Also notable, Cypress Gardens tested positive for mold, and will need to be remediated. With the exception of Cypress Gardens, all units are expected to be back online by Q2 2017.

Multifamily Assessment (Statewide)

	Total Units	Total Damaged	Percent Damaged
Bacmonila Gardens	150	35	23%
Tangi Village	96	92	96%
Livingston Manor	45	45	100%
St. Edwards Subdivision	98	38	39%
Charleston Oaks	30	30	100%
Cypress Gardens	100	4	4%
Shady Oaks	100	56	56%
Total	619	300	48%

The multi-family developments noted above are utilizing a number of funding sources to repair damaged units, including flood insurance, USDA Rural Development loans, and HOME (via LHC). LHC is working directly with the property management firms to determine where funding gaps exist and how to fill those gaps.

Impact on Homeless Populations

The Point-in-time count is an annual count of sheltered and unsheltered homeless persons on a single night conducted by Continuums of Care (CoC) across the United States. Louisiana has nine Continuums of Care, which are regional planning bodies that coordinate housing and services for homeless families and individuals. The list below provides the name of each CoC in the state, along with parishes and major cities included within each CoC (http://www.dhh.louisiana.gov/assets/docs/OAAS/publications/regionalcontinuum-of-care-list.pdf).

>> Lafayette/Acadiana CoC - City of Lafayette, Acadia, Evangeline, Iberia, Lafayette, St. Landry, St. Martin, St. Mary, Vermillion

>> Shreveport/Bossier/Northwest Louisiana CoC - City of Shreveport, Bossier City, Bienville, Bossier, Caddo, Claiborne, DeSoto, Natchitoches, Red River, Sabine, Webster

>> New Orleans/Jefferson Parish CoC - City of New Orleans, Orleans, Jefferson, St. John, St. Charles, St. James, Metairie

>> Baton Rouge CoC - East Baton Rouge, Ascension, West Baton Rouge, East and West Feliciana, Iberville, Pointe Coupee

>> Monroe/Northeast Louisiana CoC - City of Monroe, Caldwell, East and West Carroll, Franklin, Jackson, Lincoln, Madison, Morehouse, Ouachita, Richland, Tensas, Union

>> Alexandria/Central Louisiana CoC - City of Alexandria, Avoyelles, Catahoula, Concordia, Grant, LaSalle, Rapides, Vernon, Winn

>> Houma-Terrebonne, Thibodaux CoC - Lafourche, Terrebonne, Assumption

>> Louisiana Balance of State CoC – Beauregard, Allen, Calcasieu, Jefferson Davis, Cameron, City of Lake Charles, Plaquemines, St. Bernard, Natchitoches, and Sabine

According to the Jan. 25, 2016, Point-in-time count, a total of 3,994 people were counted as homeless, with 1,444 counted in emergency shelters, 1,409 in transitional housing and 1,141 unsheltered.
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To understand the homeless population prior to flooding within IA parishes and the 10 most impacted parishes, this analysis counts CoCs that contain at least one IA or most impacted parish. Eight CoC's contain IA parishes, with a total of 3,848 people counted as homeless (1,414 in emergency shelters, 1,296 in transitional housing, and 1,138 unsheltered). Four CoCs contain the 10 most impacted parishes, with a total of 1,398 people counted as homeless (422 counted in emergency shelter, 719 in transitional housing, and 257 unsheltered). 96 percent of people counted as experiencing homelessness on Jan. 25, 2016 were within IA parishes, and 35 percent of the state's total people experiencing homelessness were within most impacted parishes.

2016 Point in Time Count

Type of Shelter	State of Louisiana	Continuums of Care Containing IA Parishes	Continuums of Care Containing 10 Most Impacted Parishes
Emergency Sheltered	1,444	1,414	422
Transitional Housing	1,409	1,296	719
Unsheltered	1,141	1,138	257
Total Homeless Persons	3,994	3,848	1,398

Source: Department of Housing and Urban Development, CoC Housing Inventory Count Reports, 2016
https://www.hudexchange.info/programs/coc/coc-housing-inventory-count-reports/

To respond to DR-4263 and DR-4277, the LHC deployed staff of the Louisiana Housing Authority (LHA) into disaster shelters to assist with closing those shelters without leaving affected populations homeless. In response to the need of those who were pre-disaster homeless and precariously housed before the flooding events, LHC/LHA set up two different programs that can be expanded to meet the needs of other households that may find themselves in similar situations.

>> HOME TBRA – LHC allocated $500,000 of HOME funds to provide Tenant-Based Rental Assistance (TBRA). To be eligible for assistance, households must be elderly or disabled, 30 percent Area Median Income (AMI) or below and lack the financial resources to obtain the necessary housing. There are currently 63 households issued a voucher. In order to provide these households with a year of rental assistance and case management services, an additional $481,436 in unmet need remains. There are 56 households currently on the waiting list for HOME TBRA. $2,209,116 is the total budget to assist all 119 households with a year of rental assistance and case management services, or $1,709,116 in unmet need. However, HOME TBRA allows up to two years of rental assistance, requiring a total budget of $4,418,232, an unmet need gap of $3,918,232.

>> Rapid Re-Housing – LHC allocated $320,000 of Emergency Solution Grant (ESG) funds to provide a Rapid Re-Housing (RRH) program for pre-disaster homeless and precariously housed flood survivors. All households must have income at or below 30 percent AMI. There are currently 55 households issued a voucher for rental assistance and 19 households on a waiting list. LHC will assist the 48 households with RRH for five months with the $320,000 allocation. Due to the lack of long-term affordable rental units in the affected region, five months is an insufficient amount of time to provide assistance. LHC anticipates adding an additional $200,000 from its FY2016 allocation to the RRH program. Even with the addition of these funds, there is still an unmet gap of $1,332,000 to assist all 74 households for a 12-month period.

Daily phone calls and emails from flood impacted households that are now experiencing homelessness continue to occur. The households that have reached out to LHC are actively added to the waiting list. Other organizations assisting in flood recovery are also getting emails and phone calls. Additionally, the number of households in need of RRH will continue to rise once FEMA's Transitional Sheltering Assistance (TSA) ends. As of Jan. 19, 2017, there 1,093 households, representing 3,633 individuals checked in to the TSA program. Households that are currently staying with family and friends are another population that are at risk of homelessness as are households that are living in flooded and moldy homes. As the living situations for these households become untenable, they will require alternate living arrangements and will be in need of rental assistance.

The state understands that the full impact of the storms on the pre-disaster homeless and precariously housed population will not be known for some time. Through the resources provided below, LHA is able to provide interim assistance as the long-term housing solutions are finalized. The state is committed to ensure that the needs of this population are met and will identify programs in future Action Plan Amendments.

Additionally, there have been impacts to service providers. The Salvation Army in Baton Rouge, one of the Capital Region's largest emergency shelters, flooded during DR-4277, taking on up to 7.5 feet of water. All clients and staff were relocated. As a result, currently 24 emergency shelter beds and 50 transitional housing units are offline. As the weather turns colder, more flood impacted households that are living in untenable environments, like cars and tents, are expected to seek warmer places to stay, exacerbating the need for safe housing options. With the Salvation Army rendered inoperable and unable to expand for freeze night capacity, the state is concerned substantial populations at risk of homelessness will remain unserved.

Focusing further on Baton Rouge, the City has surveyed some of the major homeless support agencies to determine their client's needs post-flooding. The Volunteers of America (VOA) and the Bishop Ott St. Vincent de Paul both reported a 29 – 30 percent increases in persons seeking housing and homeless services. VOA reported that the number of calls per day seeking housing services have doubled from 100 to 200 and that they have no resources available to which to refer clients. In addition, VOA reported a 60 percent increase in persons classified with special needs requesting housing services. They have a waiting list which continues to grow. Prior to the flood, VOA served 86 clients with mental health and substance abuse issues. They have turned away 28 persons because of a lack of staff and operating funds to assist these individuals. Currently, there are 58 persons on the emergency shelter grant waiting list.

Bishop Ott St. Vincent de Paul, with the help of the Red Cross, increased shelter beds for men by 58 percent after the flood. Monies to support the extra beds will end Dec. 30, 2016. Bishop Ott St. Vincent de Paul serves between 1,300 – 1,400 homeless persons per year. Staff reported that, of the number of new unique persons entering the shelter post-flood, between 20 – 50 percent of the extra beds are filled with first-time homeless clients.

While the City has made great progress in reducing the number of homeless persons over the past 10 years, the flood has brought those numbers back to where they were in 2015. Additional shelter beds and extended shelter stays are required because of the impact of the flood on pre-flood, precariously housed residents, the shortage of housing, the increase in rental costs, and the reduction and termination of FEMA, HUD, and Red Cross emergency services. All agencies reported the need for funding to increase shelter beds, increase the number of case managers and support services needed to help the vulnerable homeless in accessing housing and navigating the complex post-flood housing programs and resources.

During the East Baton Rouge Metro Council meeting in December 2016, the Council approved the

allocation of approximately $1 million of its CDBG-DR funding to provide funding to homeless agencies to support the homeless. As of the date of this document, decisions regarding the specific uses of the allocated funding have not yet been made. The state is currently working closely with East Baton Rouge Parish to develop the final homelessness support program and will provide additional details as they become available.

The state is actively working to gather additional information relative to the impacts to and unmet needs of homeless populations across the state. LHA is in the process of reaching out to the CoCs identified above to determine the extent of the need across the state.

Furthermore, the state is working in close coordination with the Disaster Case Management (DCM) program, particularly as it relates to the households in the TSA program. Based on reports from the DCM service providers, there are 678 renters and 415 homeowners in the TSA population.

Due to a host of factors, most notably the lack of available affordable rental units, the most vulnerable, and potentially at-risk of homelessness, of the TSA population are those who are renters. They are unlikely to be eligible for a number of housing solutions typically made available to homeowners and many no longer have the FEMA Rental Assistance funds provided to them. In many cases, the rental assistance funds were not utilized for the appropriate purpose due to other needs, meaning those individuals are unlikely to be eligible for additional Rental Assistance funding.

The state recognizes the challenge of ascertaining the vulnerability index relative to predicting homelessness. It is difficult to determine if the renters currently in TSA were independently housed with any stability prior to the disaster or if they were precariously housed prior to the disaster. In addition, it is not clear as to which of these were living in some sort of pre-disaster subsidized or supported housing situation. These variables and situations, coupled with a reduction in available and affordable rental stock, are ultimately what will be the best predictors of homelessness from within the TSA population.

FEMA staff working directly with households in the TSA program conducted overt 2,500 face-to-face visits with applicants in hotels since Oct. 10, 2016. From those meetings, 515(21 percent) stated their primary barrier was not being able to afford rentals. An additional 203 (8 percent) said they can't find rentals, which often means they can't find rentals they can afford.

The state reviewed the data collected on the TSA population in an effort to determine which households are most at-risk of homelessness once TSA benefits are no longer available. Due to the reasons stated above, the state contends that uninsured renters are the most likely to be at-risk of homelessness once the TSA program concludes. The chart below provides a breakdown of key aspects of the data collected on the current TSA population.

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The state is committed to providing temporary housing solutions and, wherever possible, permanent housing to households that are homeless or at-risk of homelessness. Recognizing that, while a temporary housing solution may meet an immediate need, the ultimate goal is to find permanent housing solutions for individuals and families that are currently homeless or at-risk of homelessness. To that end, the state will submit a formal request in the coming weeks for 1,000 permanent supportive housing vouchers.

Moving forward, the information gathered through the CoC outreach, coordination with the DCM program, and other efforts will serve as the basis for additional requests and future allocation decisions.

Furthermore, the state received an extension to TSA until February 2017. With the approval of the extension, the state has engaged with federal, state and local public and private agencies to work through possible interim and long-term solutions for this population. The state has proposed two programs- the Rapid Rehousing and Permanent Supportive Housing Support Services- within the Method of Distribution which specifically address housing unmet needs faced by vulnerable populations either currently experiencing homelessness or at-risk of becoming homeless. Additional long-term solutions that are implemented by partner organizations and/or the state will be outlined in subsequent Action Plan Amendments.

3. Unmet Housing Needs

In discussing a full scope of unmet housing needs, it is imperative to understand other resources that have and will be expended, and where those resources have been and will be geographically deployed. To this effect, as of Jan. 12, 2017, SBA has approved $664,634,100 in real estate structural loans.

Real Estate Structural Loans Approved by SBA (as of 1/12/17)

Disaster Parish
Approved Structural
Loan Amount
Number of
Approved Loans
52
4263 Allen $135,600 10
Ascension $496,300 32
Avoyelles $96,700
2
Beauregard $506,800 37
Bienville $269,000 29
Bossier $2,219,700 190
Caddo $1,629,900 148
Calcasieu $2,106,600 103
Caldwell $531,700 51
Catahoula $1,500 12
Claiborne $489,500 34
De Soto $223,100 21
East Carroll $30,600 29
Franklin $0
7
Grant $587,400 62
Jackson $0

0
LaSalle $235,400 18
Lincoln $73,700 19
Livingston $1,114,700 154
Madison $0
4
Morehouse $1,944,400 208
Natchitoches $1,984,600 113
Ouachita $20,285,700 1,224
Rapides $509,000 29
Red River $0
7
Richland $567,100 90
Sabine $112,300 16
St. Helena $48,600 77
St. Tammany $5,450,700 339
Tangipahoa $5,160,500 599
Union $1,819,800 119
Vernon $2,435,100 93
Washington $2,585,900 241
Webster $2,899,100 149
West Carroll $338,700 69
Winn $805,600 42
Total $57,695,300 4,377
4277 Acadia $3,184,600 285
Ascension $72,686,100 2,915
Avoyelles $221,200 26
Calcasieu $0
0
53
Cameron $0 0
East Baton Rouge $274,243,000 12,766
East Feliciana $1,603,800 152
Evangeline $897,400 67
Iberia $1,388,900 237
Iberville $849,100 82
Jefferson Davis $742,200 62
Lafayette $32,953,500 1,520
Livingston $187,068,300 7,260
Pointe Coupee $646,200 73
Rapides $0 0
St. Helena $1,198,800 198
St. James $102,500 18
St. Landry $2,424,700 217
St. Martin $2,976,300 241
St. Mary $0 1
St. Tammany $939,700 75
Tangipahoa $15,819,700 1,269
Vermilion $6,364,000 393
Washington $219,100 35
West Baton Rouge $36,600 10
West Feliciana $373,100 28
Total $606,938,800 27,930

Grand Total $664,634,100 32,307

Additionally, FEMA has provided housing assistance to eligible households through the IA program. As of Nov. 22, 2016, FEMA had approved $651,261,396 in housing assistance through the IA program.

IA Housing Assistance Approved (as of 11/22/16)

Disaster	Total Approved
DR-4263	$ 72,992,887
DR-4277	$ 578,268,509
Total	$ 651,261,396

As previously presented, to calculate anticipated unmet needs for the owner-occupied household population, this analysis defers to HUD's methodology described in the Federal Register Notice (FRN) for these two disaster events. Under this methodology, for each household determined to have unmet housing needs, their estimated average unmet housing need less assumed assistance from FEMA, SBA, and Insurance was calculated at $27,455 for major damage (low); $45,688 for major damage (high); and $59,493 for severe damage. Therefore, as this methodology already contemplates unmet needs accounting for other forms of assistance, this analysis does not incorporate resources deployed by FEMA, SBA or NFIP. Data is not currently available respective to estimated needs at the minor-high and minorlow categories. While the state is currently relying on the best available data from federal agencies for

this information, ultimately the assessment of the homeowner unmet needs will be updated once the program has conducted a survey of impacted homeowners and started application intake. It is anticipated the program survey and first phase of applications will be launched in the second quarter of calendar year 2017.

Owner-Occupied Households Unmet Need Calculation

Disaster	Damage Category	Households	Estimated Needs
4263	Severe	675	$ 40,157,775
	Major-High	2,276	$ 103,985,888
	Major-Low	3,979	$ 109,243,445
	Minor-High	1,503	$ -
	Minor-Low	8,029	$ -
	Total	16,462	$ 253,387,108
4277	Severe	11,249	$ 669,236,757
	Major-High	24,270	$ 1,108,847,760
	Major-Low	15,182	$ 416,821,810
	Minor-High	3,849	$ -
	Minor-Low	13,830	$ -
	Total	68,380	$ 2,194,906,327
Grand Total		84,842	$ 2,448,293,435

Additionally, the FRN methodology contemplates unmet needs for rental housing units occupied by households with incomes less than $20,000. As outlined in the map and table below, there are 13,721 such households impacted by DR-4263 or DR-4277, with high concentrations of these populations located in the Monroe and Baton Rouge metropolitan areas. However, the FRN methodology does not contemplate a specific dollar amount for these unmet rental needs. Therefore, in the Initial Action Plan, the state used the best available data from the Disaster Housing Task Force, a task force that includes representatives from the Louisiana Housing Corporation, HUD, FEMA and other state, federal and local partners. According to this task force, the average unmet need to repair a rental unit is $17,000.

The state has updated its analysis to include an average cost of unmet need per rental unit to include data received from the SBA on businesses listed under NAICS code 531110 (lessors of residential buildings and dwellers). Using aggregated and average information on SBA verified real estate loss for rental properties ($20,431), multiplying that average loss by the number of rental housing units with a FEMA verified loss (28,470), the total loss and need for rental repair is estimated to be $581,670,570. When the state subtracts the total actual amount of funding approved by SBA for real estate assistance to residential landlords ($47,942,000), there is an estimated unmet need of $533,717,970, or an average of $18,570 per unit. This estimate does not include a deduction for assumed proceeds from NFIP or private flood

insurance. Using this assessment, the state has updated the estimated unmet needs of rental repair units from $17,000 per unit to $18,570. Using this revised average unmet need to repair a rental unit ($18,570) and multiplying it by the population identified and contemplated through the FRN (13,721), the total unmet rental repair need for the March and August 2016 flooding events is estimated to be $254,798,970.
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Renter Households Income <$20k
Disaster Damage Category Households
4263 Severe 128
Major-High 619
Major-Low 737
Minor-High 566
Minor-Low 1,074
Total 3,124
4277 Severe 1,397
Major-High 3,238
Major-Low 2,999
Minor-High 975
Minor-Low 1,988
Total 10,597
Grand Total 13,721
This analysis estimates a rental and owner housing unmet need of $2,708,342,637. Given the unique attributes of these two disasters (low rates of affected populations with flood insurance, high rates of affected populations located outside the SFHA), it is reasonable to view this unmet need estimation as a
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floor, rather than a ceiling. Additionally, over time, and as more detailed information becomes available, the state will continue to work with various stakeholder groups, affected populations and HUD itself to further refine this estimate.
Housing Unmet Need Summary
Category Amount Relative Percentage of
Unmet Housing Need
Owner-Occupied $ 2,448,293,435 90.4%
Renter $ 254,798,970 9.4%
Homeless Assistance and Prevention $
$5,250,232 0.2%
Total $2,708,342,637 100%
C. Economic Impact & Needs
1. Statewide Economic Damage & Loss Assessment
Immediately following the August event, the Louisiana Department of Economic Development (LED) partnered with Louisiana State University (LSU) to conduct an assessment of economic damages resulting from the DR-4277 flooding event. Key details are:
>> At the peak of the August event, 19,900 Louisiana businesses or roughly 20 percent of all Louisiana businesses were disrupted by the flooding event. FEMA has since referred approximately 22,000 businesses to SBA for recovery assistance.
>> A disruption of 278,500 workers or 14 percent of the Louisiana workforce occurred at the peak of the flooding event.
>> An economic loss estimated at roughly $300 million in labor productivity and $836 million in terms of value added during the period immediately surrounding the flood.
>> Approximately 6,000 businesses experienced flooding.
>> The LSU Ag Center estimates Louisiana agricultural losses of over $110 million.
Throughout the event, severe weather, flooding and resources redirected to response efforts led to business interruption losses across the region. To characterize those losses, LED and LSU estimated the percent of businesses closed each day based on the extent of flooding drawn from the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) and FEMA flood maps as well as the

duration of the flooding based on flood level exceedances from USGS streamgages along rivers and bayous across the impacted area. However, closures extended beyond those businesses directly impacted by flooding due to road closures and the severe weather that disrupted travel for both employees and customers. To assess these broader disruptions, LED and LSU reviewed situation reports from the GOHSEP, school closures and government closures.

These estimated industry closures were then adjusted by industry sector to account for the fact that some sectors were closed entirely while other sectors (e.g. large manufacturing facilities) generally continued to operate at normal, or close to normal capacity. To characterize these business interruption losses, LED and LSU estimated the number of businesses and employees impacted each day as well as the lost worker productivity, measured in terms of wages. While a number of these employees receive pay even if they were not working, the worker's productivity is lost to the employer – thus creating losses to the region.
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Of the most impacted parishes, East Baton Rouge and Livingston had the greatest impacts. Livingston, specifically, was acutely impacted with peak impacts in that parish occurring later in the event, as floodwaters continued to rise and also receded more slowly in some areas. Livingston was also most acutely impacted with a large majority of businesses disrupted to some degree, and more than half of businesses potentially flooded. The severity of flooding creates a greater risk of long-term closure, which can lead to business failure and long-term negative impacts to the region's economy.

Peak Disruption by Parish (DR-4277)

Parish	Businesses	Employees
East Baton Rouge	8,000	143,700
Lafayette	3,100	40,000
Livingston	1,800	18,700
Tangipahoa	1,500	17,000
Ascension	1,200	17,100
St. Tammany	900	8,000
Iberia	600	8,200
St. Landry	600	6,300
Acadia	400	3,900
Vermilion	400	3,700
St. Martin	400	3,100
Jefferson Davis	300	2,200
Evangeline	200	1,500
Iberville	100	2,000
Avoyelles	100	1,200
East Feliciana	100	800
Pointe Coupee	100	400
Washington	<100	300
St. Helena	<100	200
West Feliciana	<100	200
Total	19,900	278,500

Business & Wage Losses

As flooding impacted different areas at different times, the peak number of businesses and employees impacted by DR-4277 is larger than was seen at any specific point in time. In total, approximately 19,900 businesses in Louisiana experienced temporary closures, or significant operational reductions. These businesses employ approximately 278,500 workers. While many employers may have continued paying employees during closures, some hourly workers may have experienced reduced pay. LED and LSU estimated that 45,000 to 75,000 of these employees work at businesses that experienced flooding and periods without pay, or with reduced pay. At this time, the State does not have access to comparable loss data for DR-4263.

Lost Productivity and Value Added (DR-4277)

Parish	Lost Labor Productivity	Lost Value-Added
East Baton Rouge	$ 213,000,000	$ 540,200,000

Livingston	$ 27,000,000	$ 97,800,000
Ascension	$ 24,900,000	$ 68,500,000

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Tangipahoa	$ 17,400,000	$ 62,200,000
Lafayette	$ 8,600,000	$ 31,100,000
St. Tammany	$ 2,900,000	$ 8,400,000
Iberia	$ 1,800,000	$ 8,000,000
Iberville	$ 1,100,000	$ 2,900,000
St. Landry	$ 1,000,000	$ 3,300,000
Vermilion	$ 700,000	$ 2,700,000
Acadia	$ 600,000	$ 2,400,000
St. Martin	$ 500,000	$ 2,500,000
Avoyelles	$ 400,000	$ 1,600,000
Jefferson Davis	$ 300,000	$ 1,700,000
East Feliciana	$ 300,000	$ 900,000
Evangeline	$ 200,000	$ 900,000
Pointe Coupee	$ 100,000	$ 500,000
Washington	$ 100,000	$ 400,000
St. Helena	$ 100,000	$ 200,000
West Feliciana	$ 100,000	$ 200,000
Total	$ 300,900,000	$ 836,400,000

Total regional impacts attributable to lost labor productivity and lost value-added were compiled for the first three weeks of the event, providing a rough picture of the gross negative impacts of disruptions to the area. Lost labor productivity is estimated to be $300 million and lost value-added is estimated to be $836 million. During the three-week period measured, this represented approximately 6 percent of all economic activity in the state.

To estimate damage to businesses, LED and LSU relied on GOHSEP flood maps and FEMA flood maps, as well as flood maps published by parishes in the flooded area. Researchers then overlaid infoUSA point level data on business locations for the impacted parishes to estimate the extent of business flooding in each parish. The total number of businesses estimated to have flooded is 6,100 across the 20 parish area. It is worth noting that 60 percent of businesses in Livingston parish are estimated to have experienced some flooding and 19 percent of those in Ascension as well as 15 percent of those in East Baton Rouge, the parish with by far the largest overall number of businesses in the impacted area.

Data from the Bureau of Economic Analysis was used to estimate the value of business structures and equipment based on the size of employer and industry. LED and LSU estimated damage to business structures totaled $595.6 million and damage to fixed equipment will add another $262.8 million to business losses.

Many businesses experiencing flooding lost substantial inventories, which were estimated based on the sales of impacted businesses and data from the Bureau of Economic Analysis that relates average inventories to sales for businesses in manufacturing, wholesale trade and retail trade. LED and LSU estimated a total of $1.4 billion in inventory damaged by DR-4277 flooding. This figure represents an average of over $200,000 in inventory for each flooded business. While many impacted businesses were likely smaller businesses that would have significantly lower inventories, a relatively small number of large wholesalers and retailers with substantial inventories can heavily skew the average relative to the typical loss. For example, the Dixie RV Superstore, a recreational vehicle dealership in Hammond estimated as much as $30 million in damage attributable to a large portion of their vehicular inventory being flooded.

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Similarly, stores like the Walmart and Home Depot in Denham Springs flooded and would have lost inventory values much higher than what is typical across the 6,000 businesses that flooded.

Agricultural Losses

In response to DR-4263 and DR-4277, Kurt M. Guidry of the LSU AgCenter conducted impact estimates on Louisiana's agriculture sector. Following DR-4263, 24 parishes reported agribusiness impacts totaling an estimated loss of $80 million. The March 2016 flood event occurred at the beginning of the year's planting season, impacting pasture and livestock infrastructure, causing livestock deaths and requiring extensive replanting of crops. Extensive rainfall after the event further exacerbated crop problems, delaying replanting past normal planting windows and reducing crop yields.

The LSU AgCenter and Farm Service Agency surveyed damages specific to DR-4263. The table below provides details on the acreage impacted by crop. Overall, almost 90,000 acres of crops were impacted by the flooding event.

DR-4263 Crops Impacted

Crop	Acres Impacted
Corn	7,545
Cotton	7,960
Soybeans	18,000
Pasture	52,200
Rice	2,000
Sorghum	2,000
Total	89,705

Following DR-4277, the LSU AgCenter estimated impacts to the agricultural sector to exceed $110 million. This estimate is conservative, as it only included selected commodities including rice, soybeans, sugarcane, sweet potatoes, fruits and vegetables, corn, sorghum, cotton and lost grazing days for livestock. The economic estimates used acreage, historic yields and pricing data to predict yield loss resulting from DR-4277.

Estimated Agricultural Losses

Crop	DR-4263	DR-4277
Corn	$43,454,125	$10,901,631
Soybeans	$25,182,504	$46,754,976
Cotton	$117,077	$3,695,816
Sorghum	$251,771	$417,931
Rice	$7,240,111	$33,624,629
Sweet Potatoes	$401,200	$4,465,247
Wheat	$3,638,397	N/A
Sugarcane	N/A	$3,203,320
Grazing	N/A	$1,973,528
Fruits/Vegetables	N/A	$5,206,991
Total	$80,285,185	$110,244,069

OCD-DRU is working with the LSU AgCenter and its partners to gain a clearer understanding of impacts and unmet needs across Louisiana's agriculture sector. To that end, information is being collected relative to crop loss insurance policies, the Non-insured Crop Disaster Assistance Program (NAP) and any payments

made to livestock, aquaculture, bee keepers and others under permanent disaster assistance programs.

A coordination of efforts and sharing of information amongst USDA' Risk Management Agency, the Farm Service Agency, and LSU AgCenter will enable OCD-DRU to assess the impacts of DR-4263 and DR-4277 and accurately target recovery funds to address the greatest needs.

Combined Losses

Economic Loss Summary

Category	Loss Estimate
Agriculture (DR-4277)	110,200,000
Agriculture (DR-4263)	$ 80,285,185
Business Structures	$ 595,600,000
Business Equipment	$ 262,800,000
Business Inventories	$1,425,500,000
Business Interruption Loss	$ 836,400,000
Total	$3,310,829,254

2. Unmet Economic Needs

As with housing, in discussing a full scope of unmet economic needs, it is imperative to understand other resources that have and will be expended, and where those resources have been and will be geographically deployed. To this effect, as of Dec. 30, 2016, SBA had approved $160,400,000 in Business and Economic Injury Disaster Loans (EIDL) to affected populations from DR-4263 and DR-4277. Highest concentrations of these approvals have been in the Baton Rouge Capital Region and in the metropolitan Lafayette region. In addition, OCD-DRU is working to gather data relative to private insurance claims in order to more accurately identify the remaining unmet needs of the business community.

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SBA Business/EIDL Loans (as of 12/30/17)

Disaster	Parish	Number of Loans	Total Loan Amount
4263	Ascension	2	$39,700
	Ashley	1	$18,200
	Beauregard	1	$39,000
	Bienville	1	$25,000
	Bossier	8	$709,500
	Caddo	11	$537,100
	Caldwell	3	$79,400
	Cameron	1	$25,000
	Catahoula	1	$14,300
	Grant	1	$25,000
	Lincoln	3	$91,000
	Livingston	1	$25,400
	Morehouse	13	$1,240,600
	Natchitoches	8	$462,000
	Ouachita	84	$8,022,500

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	Rapides	3	$100,700
	Red River	1	$115,300
	Richland	3	$101,400
	Saint Tammany	13	$1,903,100
	Tangipahoa	13	$528,700
	Union	6	$242,800
	Vernon	4	$201,300
	Washington	14	$557,500
	Webster	5	$111,500
	West Carroll	2	$54,000
	Winn	3	$424,800
	Total	206	$15,694,800
4277	Acadia	19	$755,300
	Ascension	111	$7,711,200
	Avoyelles	1	$18,700

Calcasieu
2 $37,000
East Baton Rouge 774 $77,951,500
East Feliciana
6 $284,300
Evangeline
4 $179,000
Iberia 14 $802,500
Iberville
2 $76,000
Jefferson
1 $65,300
Jefferson Davis
4 $178,200
La Salle
1 $24,200
Lafayette 95 $6,166,800
Livingston 361 $41,577,400
Orleans
1 $15,100
Pointe Coupee
9 $751,300
Saint Helena
6 $432,700
Saint Landry 10 $650,400
Saint Martin 13 $1,232,200
St John The Baptist
1 $25,000
Tangipahoa 48 $4,836,900
Vermilion 16 $745,100
Washington
2 $34,300
West Baton Rouge
3 $225,200
Total 1,504 $144,775,600
Grand Total 1,710 $160,470,400
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Accounting for resources disbursed through SBA loans, this analysis estimates an unmet economic need of $3,150,429,254. Note, this analysis contemplates that a portion of these needs may have been mitigated by resources disbursed through NFIP. These resources are discussed in the subsequent section outlining the state's total unmet need calculation.

Economic Unmet Need Summary
Category Amount
Agriculture Losses $ 190,529,254
Business Losses $ 3,120,300,000
SBA Loans $ (160,400,000)
Total $ 3,150,429,254

D. Infrastructure Impact & Needs

1. Statewide Infrastructure Damage & Loss Assessment

Infrastructure Systems affected by DR-4263 and DR-4277 included damage and disruptions to levees, roadways and bridges (especially rural roadways), culverts, utilities, wastewater treatment systems, drinking water treatment and collection systems. Across Louisiana, flood basins were overwhelmed by record-breaking or near record-breaking rainfall. In some of the coastal parishes, the runoff of rain was

compounded by southern winds that elevated tidal basins and thus inhibited drainage runoff.
Damages to roadways and bridges inflicted the most significant damages. Impacts to Interstates 10, 49, and 20 rendered vehicle traffic into and out of Louisiana impossible for multiple days during the height of each flooding event. During and in the aftermath of DR-4263, the Red River was rendered unnavigable for several days. Multiple railways across the state were unable to safely pass cargo due to elevated flood waters. In addition, data showed indications of stress and wear on many urban drainage systems.

2. Unmet Infrastructure Needs

FEMA Public Assistance

The FEMA Public Assistance (PA) Program is designed to provide immediate assistance to the impacted jurisdictions for emergency work and permanent work on infrastructure and community facilities. For DR4263,
the state's obligation has been established as not less than 25 percent of eligible project costs. For DR-4277, the state's obligation has been established as not less than 10 percent of eligible project costs. As of Nov. 21, 2016, $36,501,492 has been identified in PA need for DR-4263 and $247,039,464 has been identified for DR-4277. GOHSEP estimates these totals to rise to $93,751,791 for DR-4263 and $750,000,000 for DR-4277. Based on these data, the current unmet need is $12,167,167 for DR-4263 and $27,448,829 for DR-4277. Long term, based on GOHSEP's projections, the state estimates this unmet need to grow to $31,250,597 for DR-4263 and $83,333,333 for DR-4277, respectively, for a grand total of $114,583,930. The PA match unmet needs provided by GOHSEP and calculated by OCD-DRU are estimates at this time, based on current best available data and an understanding of the match needs. However, the state will work with GOHSEP, local governments, non-profit organizations and other entities eligible for FEMA PA to gather additional information related to needs as projects are reviewed and approved through the Project Worksheet process. The state will be able to update and identify the actual unmet needs related to the FEMA PA match once the CDBG-DR-funded FEMA PA Match program is underway and the state receives information directly from the applicants to that program.

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PA Intake & Projections (as of 12/28/16)

Disaster Category Total PWs Federal Share State Share
4263 (25% State Share) A 80 $4,016,450 $1,338,817
B 214 $16,760,650 $5,586,883
C 241 $12,861,249 $4,287,083
D 10 $1,091,779 $363,926
E 104 $3,031,827 $1,010,609
F 65 $1,895,337 $631,779
G 44 $2,849,768 $949,923
Z 1 $792,857 $264,286
Current 4263 Total 759 $43,299,917 $14,433,306
Projected 4263 Total 909 $96,460,853 $31,096,475
4277 (10% State Share) A 29 $59,113,326 $6,568,147
B 165 $215,005,895 $23,889,544
C 41 $1,637,874 $181,986
D 5 $565,686 $62,854
E 55 $4,165,270 $462,808

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F 20 $488,875 $54,319
G 2 $73,711 $8,190
Z 1 $5,636,250 $626,250
Current 4277 Total 318 $286,686,887 $31,854,099
Projected 4277 Total 1,224 $750,000,000 $75,000,000
Current Grand Total 1,077 $329,986,804 $46,287,404
Current Projected
Grand Total
2,133 $846,460,853 $106,096,475

Hazard Mitigation Grant Program

The Hazard Mitigation Grant Program (HMGP) will be a critical part of the long-term recovery process in both rebuilding and protecting housing stock and vital infrastructure. These grant funds are calculated at 15 percent of the total FEMA Individual Assistance and Public Assistance allocations attributable to DR4263 and DR-4277. As of Nov. 15, 2016, the state had received an award letter from FEMA indicating a $26,117,655 grant in response to DR-4263. Additionally, the state estimates it will receive an additional $252 million HMGP grant in response to DR-4277.

Unlike PA, the state's obligation for both DR-4263 and DR-4277 has been established as not less than 25 percent of eligible project costs. Therefore, the state's unmet need estimate is $8,705,885 for DR-4263 and $84 million for DR-4277, with a combined total in excess of $92.7 million.

HMGP Award & State Share

Disaster	Federal Share	State Share
DR-4263	$ 26,117,655	$ 8,705,885
DR-4277	$ 252,000,000	$ 84,000,000
Total	$ 278,117,655	$ 92,705,885

Therefore, this analysis contemplates a total unmet infrastructure unmet need gap of $207,289,815.

Infrastructure Unmet Need Summary

Category	Amount
PA Cost Share	$ 114,583,930
HMGP Cost Share	$ 92,705,885
Total	$ 207,289,815

3. Resilience Gaps

Broadly, the state recognizes DR-4263 and DR-4277 have exposed a wide array of resilience gaps within the communities affected by these two events. Specifically, these gaps include needs for planning and implementation of strategically-focused projects and programs at all scales, from individual investments at the household level to large-scale structural investments designed to impact entire watersheds. These will include basin-wide planning and modeling initiatives in all impacted areas to provide the best information necessary to make wise DR investment decisions delivering optimal benefits. The ultimate purpose of the investments is to reduce floodplain risk exposure throughout the entire impacted region, reducing the necessity of structure elevations while protecting the substantial long-term recovery

investments to be made with private and public funds over the next several years as a result of DR-4263 and DR-4277.

Such an approach envisions need for both structural and nonstructural interventions. Structural investments may include large-scale diversions, retention/detention ponds and canals, channel modifications and other large and small-scale structural approaches. Nonstructural strategies may include an elevation program for those households substantially damaged within the floodplain, flood-proofing, voluntary buy-outs of high risk properties, modified building codes, land-use planning and management, targeted infrastructure investments, technical and staffing support, small-scale retention and detention techniques for homes and businesses and public outreach and education efforts. Nonstructural approaches are expected to reduce risk by reducing the need for elevations and by creating a greater buffer between assets and floodplains.

Predicting what types of programs and projects will be funded and at what level is premature prior to modeling for current and future risk within the state's affected watersheds and floodplains. Once these efforts have been undertaken, and the state is able to apply specific measures within risk models to determine optimal return on investment with respect to future damages and resilience, the state will propose a full slate of resilience-oriented investments paired with demonstrable measures of effectiveness.

It is important to note that the state is already applying planning funds to the process of better understanding the impacted basins in anticipation of funding to implement these strategies.

Generally, the state has identified five general types of resilience-building activities for potential CDBGDR investment:

Structural Investments to Address Regional Watershed Protection

Currently, there are three major diversion projects under consideration across southern Louisiana. Two diversion projects, which will be located at the southern reaches of the Mississippi River, have recently received $250M in funding as a result of the Deepwater Horizon settlement with British Petroleum. The Mississippi diversions are intended to divert sediment and create new land. There is also a project plan in place to divert floodwaters from the Comite River in East Baton Rouge Parish to the Mississippi River. According to best data available to the state, the Comite River diversion project, if it had been implemented prior to the August flooding event, potentially could have substantially reduced the disaster's impacts in the Baton Rouge metropolitan area.

In addition to diversions, reservoir creation and channel modification projects have been used to help reduce flood levels in the floodplain. Such projects have been identified within the most-affected areas, and like the Comite River diversion, could have substantially mitigated the disaster's impact had they been implemented prior to the August event.

Resilience Add-Ons to Planned Public Infrastructure Projects

The state will strive for all public buildings erected with CDBG-DR funds to be certified LEED to ensure lower water and power bills as well as healthy indoor air quality for residents. In addition, the state will encourage the incorporation of a combined heat and power (CHP) system, which will be designed to continue providing a reduced level of electricity and cooling to the building in the event of a grid/power outage, in the construction of houses or complexes. By incorporating smart-grid designs, the state would seek to lower its overall energy risk profile, mindful of the frequency in which it experiences outages attributable to significant disaster events.

Stormwater Retention by Household

At 62.45 inches of rain per year, Louisiana experiences some of the highest annual rainfall in the country, as evidenced by DR-4263 and DR-4277. Stormwater runoff during heavy rain events causes flooding that affects the well-being, property, and livelihood of every inhabitant. Outdated stormwater and pumping systems, designed to alleviate flooding, are often overwhelmed during heavy rains. Not only are these systems costly, outdated, and inadequate for the high levels of rain, but they have become recognized as one of the main causes of subsidence.

One approach to addressing the abovementioned issues is implementing stormwater management projects and programs at the individual household level. Individual household measures can help keep rainwater out of drainage systems, reducing overall system requirements.

Like natural systems, stormwater management projects and programs can contribute to diverting, holding, and moving excess stormwater. If one household were to purchase and regularly use a rain barrel every day, that household would likely not be able to fully address all of their stormwater needs. However, if all households were to implement stormwater management measures to help slow the flow of water to the drainage system, the demands on the management system are dramatically decreased.

According to sources at the Urban Conservancy (UC), a nonprofit in New Orleans that helps individual households address their stormwater management needs, this systematic approach can be done in steps. Step number one, according to the UC, is the elimination of excess paving. Large amounts of impermeable concrete keeps water from flowing back into the natural system and quickly pushes large amounts of water to the drainage system where it can overload the system, causing flooding. Where hard surfaces are necessary, like for parking, installation of permeable pavement can reduce flow to drainage systems. Permeable paving uses interlocking, recycled materials to create a grid in place of the old impermeable surfaces, and instead of filling that grid with concreate, they instead fill it with different types of permeable gravel. This gravel allows for the flow of rainwater back into the natural system. In other words, permeable paving functions practically like concrete, while allowing infiltration of the rain that falls on it. The third step recommended by the UC is to divert roof run-off into featuressuch as rain barrels, retention ponds and rain gardens where the water is held and then released or used at a later date.

In anticipation of a large-scale suite of programs designed to effectuate rehabilitation of single-family homes and businesses impacted by the two flooding events, it would be prudent to embed these resilience-building, flood-mitigating principles into the deployment of such a homeowner rehabilitation effort.

Community Stormwater Retention

The recommendations made at the individual level, community level projects to address stormwater retention and management must be addressed systematically. If one household were to implement all of the abovementioned recommendations their household would only be managing stormwater at a small, lot sized scale. If a community as a whole can begin implementing these projects on an intersection-byintersection,
or the neighborhood-by-neighborhood scale, such activities can have a real, demonstrable impact on the community's flood risk profile.

Another way to promote resilient communities through community level projects can be found in the NDRC application for the City of New Orleans. In the application, the City of New Orleans made several recommendations for community level resilience measures. Below is a list:

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>> Blue-Green Parklands – Construct a series of large-scale Blue-Green Parklands on underutilized sites for significant water storage, ecological benefit and recreational opportunities.

>> Blue-Green Corridors – Install blue or green infrastructure where underutilized sites are located.

>> Neighborhood Networks – Develop a network of green infrastructure interventions in a concentrated scale.

>> Canals – Transform existing drainage canals into public waterfronts.

Additional recommendations may include:

>> Remove excess paving and impermeable surfaces and replace with permeable surfaces at locations that are burdened with large amounts of concrete/asphalt such as: Churches, supermarkets, retail stores, schools, businesses, and community centers.

>> Similar to the City of New Orleans' Blue-Green Parklands and Corridors, take empty lots and/or blighted properties, and turn them into green space, blue space, and public amenities.

>> Other areas concrete would be used such as sidewalks, basketball or tennis courts, picnic sights etc., use permeable surfacing.

>> Leverage existing programs, such as the Urban Conservancy's Building Active Stewardship in New Orleans (BASIN) program or Green Light New Orleans' rain barrel and green light bulb replacement installation programs, to name a few.

Planning and Flood-Risk Modeling

Planning with LA SAFE

Through this recovery efforts, the state would also seek to leverage its own activities through its National Disaster Resilience award. Already funded by HUD, the LA SAFE Framework focuses on three typologies – Reshaping, Retrofitting, and Resettlement – using a forward-thinking, risk-based approach to guide the state's future land use and development patterns. Areas projected to experience in excess of 14 feet of flooding in a 100-year storm event 50 years from now are areas in which the state generally recommends community resettlement projects, like the one it has commenced for the Isle de Jean Charles community in Terrebonne Parish. Areas projected to experience between 3 feet and 14 feet of flooding in a 100-year storm event 50 years from now are those in which the state plans to facilitate holistic and strategic adaptations around the social, cultural and economic assets which it cannot abandon. Areas projected to experience less than 3 feet of flooding in a 100-year storm event 50 years from now are those in which the state plans to incentivize future economic and population growth. We know we cannot eliminate Louisiana's flood-risk profile, but we must preserve – and when possible expand – economic and community development opportunities in moderately vulnerable areas, while incentivizing population and economic growth in those areas minimally at risk.

Coastal Protection and Restoration Authority (CPRA) & CLARA

The 2012 Coastal Master Plan, which is being updated for 2017, was based on state-of-the art science and analysis, and its modeling process provides a holistic understanding of our coastal environment today while anticipating changes expected over the next 50 years. The Coastal Louisiana Risk Assessment (CLARA) model is a quantitative simulation model of storm surge flood risk developed by the RAND Corporation. In the Coastal Zone, this is the model upon which LA SAFE relies. However, the state must take a more holistic, watershed-based approach to flood-risk modeling, especially in light of these two rain events in March and August.

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Riverine Flood Modeling – USGS

The CLARA model outlined above does a good job of projecting risk for coastal Louisiana; however, this modeling system does not consider the risk of riverine flooding from rainfall, which is what occurred in Louisiana in March and August. The United States Geological Survey (USGS), through their Flood Inundation Mapping (FIM) Program, provides one option to help the state better understand its riverine flood risk in the future. Others include The Water Institute of the Gulf, and the Corps of Engineers, all of which are under consideration at this time. All investments in protective and resilient infrastructure will be made based on the results of extensive modeling and cost benefit analysis.

Summary of Unmet Resilience Need Gaps

Based on the categories of resilience need gaps articulated above, the State anticipates a total unmet need of $600,000,000. This total has been derived based on the following:

>> Structural Investments ($75,000,000): This estimate is based on an assumption such structural investments would be paired with other sources of funding, including but not exclusive to those articulated in the State's 2017 Coastal Master Plan.

>> Resilience Add-Ons to Planned Infrastructure ($132,915,926): As outlined in the section documenting unmet infrastructure needs, the State anticipates a total investment of $1,329,159,261 through FEMA's PA and HMGP programs in conjunction with DR-4263 and DR4277 recovery efforts. Based on similar initiatives in past disaster recovery environments, the State believes these resilience-building add-ons would increase total project costs by 10%.

>> Household Stormwater Retention ($122,414,672): As outlined in the section documenting unmet housing needs, the State anticipates a total unmet need of $2,448,293,435 for affected owneroccupied units. The State believes retention adaptations would increase these project costs by 5%.

>> Community Stormwater Retention ($239,669,402): This estimate is based on the State's historical precedence in implementing neighborhood-level water management projects, specifically those following hurricanes Katrina, Rita, Gustav and Ike.

>> Planning & Flood-Risk Modeling ($30,000,000): This estimate is comparable with scale of the State's Comprehensive Resiliency Pilot Program, implemented following hurricanes Gustav and Ike. Given the comparable nature of the large geographic areas impacted by both Gustav and Ike and DR-4263 and DR-4277, the State believes these needs are roughly comparable to one another in terms of programmatic scale.

These gaps have been summarized as follows:

Resilience Unmet Need Gaps

Category	Amount
Structural Investments	$ 75,000,000
Resilience Add-Ons to Planned Infrastructure	$ 132,915,926
Household Stormwater Retention	$ 122,414,672
Community Stormwater Retention	$ 239,669,402
Planning & Flood-Risk Modeling	$ 30,000,000
Total	$ 600,000,000

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E. Public Service Unmet Needs

Through the implementation of the National Disaster Recovery Framework (NDRF), the state, along with FEMA and GOHSEP, have held Community Planning and Capacity Building meetings state wide in accordance with Recovery Support Function 1 (RSF 1). The RSF 1 meetings occurred with Ascension Parish, the Town of Sorrento, the City of Gonzales, the City of Denham Springs, Livingston Parish, and St. Tammany Parish. As a result of these meetings, the leadership and key staff of all impacted communities have identified needs in all service areas handled by a government entity, such as the flooding of fire, police stations and other government buildings, which provide key public services to citizens as well as large-scale infrastructure projects that will need to be implemented in order to recover.

Funding is a severe handicap, especially compounded by the fact that sales tax and other revenue streams to local government have declined, or are expected to decline, once the initial buying of cars, building materials, etc., subsides. Therefore, the approved budgets for the upcoming fiscal year are having to be revisited and modified, which includes the deferral of planned projects and a potential decrease in staffing for fire and police and other services to meet the immediate recovery needs of the parishes. For example, in Livingston Parish alone, the parish lost a minimum of 10 fire trucks, 33 police vehicles, 61 school buses and 20 other parish-related vehicles which will need to be replaced, impacting the funding for other projects.

Due to the limited funding available to address the full breadth of recovery needs, the state is not prioritizing funding to address the public service needs described above. However, in anticipation of additional funding being made available, OCD-DRU will be implementing a program by which it will provide funding to cover the non-federal share of FEMA Public Assistance projects. Funds will be provided as payment to state or local entities for eligible activities within approved Project Worksheets. The match funding will lessen the financial burden placed on the entities and assist them to continue normal operations and address recovery needs.

In addition to those public services traditionally provided by units of local government, through experience with disaster events in the past, the state understands that following a storm event, there is an increased need for mental health services, legal counseling and title services, housing counseling, job search and connection services as well as training for those residents who may have lost their source of employment as a result of the disaster events.

The FEMA-funded Disaster Case Management (DCM) program implemented by the Louisiana Department of Health is a process whereby a qualified case manager serves as a single point of contact for individuals or families who were impacted by the floods. This person helps households return to a state of independence. The case manager can help families identify their unmet needs and then make referrals to the appropriate agencies. This includes access to health care including mental health services, housing, home repairs, transportation and other essential services. It is estimated that over 1,500 families will receive assistance through the Disaster Case Management program.

In addition, the Southeast Louisiana Legal Services is providing free legal assistance to low income homeowners facing title challenges. These services will help assisted homeowners participate in the state's homeowner program.

However, the state also understands from past experience that, while some of these public services needs may be addressed in the immediate aftermath of the flood event, additional unmet needs for these types

of services will become apparent as the short-term funding for services ends and the lingering and longterm impacts from the floods begin to take their toll on individuals and families. The state will continue to assess the need for public services, as it conducts program intake and continues outreach to local governments, non-profit and faith-based organizations and other community stakeholders. At this time, due to the limited funding available to address the full breadth of long term community service needs, the state is limiting access to CDBG-DR funded public services to the most vulnerable through the Rapid Rehousing and Permanent Supportive Housing Support Services programs.

F. Summary of Unmet Needs & Additional Considerations

In summary, and outlined in the sections above, through this analysis, the state has noted the following sources of recovery expenditure through the FEMA IA program and through various SBA loan programs.

IA Housing Assistance Approved (as of 11/22/16)

Disaster	Total Approved
DR-4263	$ 72,992,887
DR-4277	$ 578,268,509
Total	$ 651,261,396

Summary of SBA Loans Approved (as of 12/30/17)

Disaster	All Loans	Home Loans	Business Loans	EIDL
DR-4263	$ 75,383,450	$ 57,695,300	$ 14,689,050	$ 2,999,100
DR-4277	$ 749,650,650	$606,938,800	$ 111,228,750	$ 31,483,100
Grand Total	$ 825,034,100	$664,634,100	$125,917,800	$34,482,200

As of Nov. 22, 2016, there were 33,177 policy claims made through NFIP for DR-4263 and DR-4277 and

$626,583,804 approved or disbursed through the program. As of Jan. 12, 2017, a total of $446,927,484 has been paid for 26,626 NFIP claims for DR-4277, but as of the data of this publication, data from DR4263 is not available. There is a 60-day delay from when a claim is processed and when it is reflected in NFIP data, so the data from Dec. 12, 2017, only reflects NFIP claims from 60 days prior.

It should additionally be noted this total represents an initial sample of what will ultimately be claimed and disbursed through NFIP. As of Dec. 3, 2016, FEMA had granted Gov. John Bel Edwards request to extend the filing deadline by which those affected by DR-4277 must submit a proof of loss claim. With the extension, applicants will have 180 days from the date of the loss to provide the completed paperwork to the insurer.

NFIP Payouts for Residential Single Family (Structural Damage Only) –
4277 Only (As of 1/12/17)

Disaster Parish Number of Claims Total Amount Paid Out
4277 Acadia 616 $5,505,109
Allen 2 $36,000
Ascension 3,610 $55,308,648
Avoyelles 27 $168,818
Bossier 3 $39,437
Calcasieu 24 $41,332
72
Cameron 8 $17,000
Concordia 1 $0
East Baton Rouge 9,991 $185,306,197
East Carroll 1 $0
East Feliciana 17 $124,000
Evangeline 61 $584,779
Iberia 310 $2,755,212
Iberville 61 $449,611
Jefferson 27 $6,690
Jefferson Davis 73 $343,250
Lafayette 2,277 $39,430,297
Lafourche 3 $38,466
Lincoln 1 $0
Livingston 6,852 $130,761,688
Morehouse 1 $0
Orleans 13 $0
Ouachita 5 $10,000
Pointe Coupee 135 $640,747
Rapides 1 $0
St. Bernard 2 $0
St. Charles 7 $10,600
St. Helena 25 $567,198
St. James 26 $185,028
St. John The Baptist 2 $0
St. Landry 169 $1,247,005
St. Martin 240 $1,752,801
St. Mary 4 $786
St. Tammany 129 $803,403
Tangipahoa 985 $11,343,274
Terrebonne 6 $1,751
Vermilion 852 $9,026,305
Washington 19 $9,000
West Baton Rouge 23 $160,698
West Feliciana 17 $252,355

Total 26,626 $446,927,484
Summary of Unmet Needs
Type Amount
Housing $1,288,696,623
Economic $3,088,429,254
Infrastructure $93,802,360
73
Resilience $600,000,000
Total $5,070,928,237
G. Anticipated Unmet Needs Gap
During the Oct. 10, 2016 Congressional Session, state government officials, including Gov. John Bel Edwards, traveled to Washington D.C. and worked collaboratively with Louisiana's Congressional Delegation to secure long-term disaster recovery resources in response to DR-4263 and DR-4277. Working with limited disaster loss unmet need information, Louisiana's delegation proposed a relief package of nearly $3.8 billion. This package focused primarily on housing needs, as the state has prioritized housing as its most urgent and pressing recovery concern following the two flooding events. Through this Action Plan, the state now presents revised unmet need estimates based on current best available data. Over time, the state reserves the right to continue to update these estimates as additional assessments are made and more complete data becomes available. The state will use information collected through application intake and ongoing community outreach, coupled with updated data received on a weekly and monthly basis from SBA, FEMA and NFIP to update its unmet housing, economic, public infrastructure, public services and planning needs assessments. As the unmet needs assessment is updated, the state will review its programs to ensure they are best designed to meet the recovery needs of the state and its residents and businesses.
Accounting for the initial appropriation of $437,800,000 and the second appropriation of $1,219,172,000 for long-term recovery purposes, the state has calculated a remaining unmet need gap of $5,070,928,237.
Summary of Total Unmet Needs
Category Losses/Gaps
Known
Investments
Remaining Unmet
Need
Owner-Occupied Housing $2,448,293,435 $2,448,293,435
Homeowner Rehabilitation and Reconstruction (CDBG-DR) ($1,293,693,120) ($1,293,693,120)
Rental Housing $254,798,970 $254,798,970
In-fill and Repair Rental Program (CDBG-DR) ($45,000,000) ($45,000,000))
Multi-family Gap Program (CDBG-DR) ($45,000,000) ($45,000,000)
Piggyback Program (CDBG-DR) ($19,000,000) ($19,000,000)
Public Housing $8,539,159 ($4,492,053) $4,047,106
Homeless Assistance $5,250,232 $5,250,232
Rapid Rehousing (CDBG-DR) ($16,000,000) ($16,000,000)
PSH Support Services (CDBG-DR) ($5,000,000) ($5,000,000)
Agriculture Losses (DR-4277) $110,244,069 $110,244,069
Agriculture Losses (DR-4263) $80,285,185 $80,285,185
Business Structures $595,600,000 $595,600,000
Business Equipment $262,800,000 $262,800,000
Business Inventories $1,425,500,000 $1,425,500,000
Business Interruption Loss $836,400,000 $836,400,000
SBA Business/EIDL Loans ($160,400,000) ($160,400,000)
Small Business Program (CDBG-DR) ($51,200,000) ($51,200,000)
Small Business Technical Assistance Program (CDBG-DR) ($800,000) ($800,000)
Louisiana Farm Recovery Program ($10,000,000) ($10,000,000)

PA State Share $106,096,475 $106,096,475
FEMA PA Match Program (CDBG-DR) ($105,000,000) ($105,000,000)
HMGP State Share $92,705,885 $92,705,885
Resilience Gaps $600,000,000 $600,000,000
Totals $6,826,513,410 ($1,755,585,173) $5,070,928,237
*CDBG-DR investments are inclusive of program delivery costs.

4. Method of Distribution and Connection to Unmet Needs

A. Method of Distribution Process

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

B. Connection to Unmet Needs

Based on the unmet needs assessment and input from impacted communities throughout Louisiana, the state has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities. While the impact of the 2016 Severe Storms and Flooding was much greater than the resources available through these two HUD allocations, these programs will begin to address the unmet needs in homeowners' primary residences and rental housing, economic recovery and revitalization, and damages to public infrastructure.

The Continuing Appropriations Act, 2017, and the Further Continuing and Security Assistance Appropriations Act, 2017, require that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver); (2) meet a national objective as defined by 24 CFR 570.483; and (3) address a direct or indirect impact from the disaster in parishes declared by the President to have been impacted by the disaster. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act of 1974, as amended. The recovery activities described herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low and moderate income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Louisiana.

As required by the Federal Register, 81 FR 83254, November 28, 2016, and 82 FR 5591, January 18, 2017, the state will spend 80 percent of the overall grant on activities undertaken in the HUD-identified “most impacted and distressed” area. The HUD-identified “most impacted and distressed” area for the 2016 Severe Storms and Flooding consists of Acadia, Ascension, East Baton Rouge, Lafayette, Livingston, Ouachita, St. Tammany, Tangipahoa, Vermillion, and Washington parishes. However, the state may determine to make the remaining funds available for eligible program activities in all disaster-impacted parishes.

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

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The 2016 Severe Storms and Flooding caused significant levels of damage to owner-occupied and rental housing within impacted parishes. Based on the state's review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is more than $2.7 billion. The need for safe, decent, and affordable housing is the state's top priority, which is why the state has allocated a proportion not equivalent to the unmet needs described above. Over 86 percent of the programmatic funding from the total allocation of CDBG-DR funds goes to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes as well as provide affordable rental housing for persons displaced by the storm.

In addition to implementing homeowner and rental programs, the state intends to implement programs that benefit small businesses and state and local entities faced with covering a non-federal match requirement for FEMA Public Assistance projects.

The state will dedicate the total allocation to date of $1,656,972,000 to address unmet housing, economic, and infrastructure recovery needs. Of this, $1,423,693,120 will be dedicated to the meet the unmet housing needs, including rehabilitation of owner-occupied households ($1,293,693,120) and the repair and increase of the stock of affordable rental housing for impacted renters ($130,000,000). Economic recovery will be supported by $62,000,000dedicated to assist small businesses and farmers impacted by the flood events. Local governments and entities eligible for FEMA Public Assistance will be eligible for the non-federal cost share within the PA Match Program, totaling $105,000,000.

Due to the limited funds received in the first two allocations, the state has prioritized vulnerable populations throughout each of the programs proposed in this Action Plan. For the owner-occupied housing programs, low-to-moderate income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. In the tenant-based programs, the state will prioritize these vulnerable populations as well as persons displaced by the disaster event in need of affordable housing. The programs that create or repair rental stock are designed to stretch limited funding as far as possible and to maximize the number of affordable units that will be made available to low to moderate income households. As mentioned in the unmet needs section above, as the state conducts housing program intake it will coordinate outreach efforts in accordance with locales with high-levels of documented damages and social vulnerability.

The state's economic recovery and revitalization programs will focus on small businesses, which are consistently more vulnerable to the impacts of disasters. Small businesses are critical to the revitalization of the households, neighborhoods and communities in which they are located. Historically, a sizable portion of small businesses are less able to secure assistance from other sources and struggle to reopen or maintain operations following a disaster event.

With respect to public infrastructure, OCD-DRU will implement a program by which it will provide funding to cover the non-federal share of FEMA Public Assistance projects. Funds will be provided as payment to state or local entities for eligible activities within approved Project Worksheets. The match funding will lessen the financial burden placed on the entities and assist them to continue normal operations and address recovery needs.

C. Allocation of Funds

State of Louisiana CDBG-DR Total Allocation

Total Allocation $1,656,972,000

Restore Louisiana Housing Programs $1,423,693,120

Homeowner Program $1,293,693,120

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Rental Housing Programs $ 130,000,000

Restore Louisiana Economic Recovery and Revitalization Programs $62,000,000

Infrastructure Program (PA Match) $105,000,000

Administration and Planning $ 66,278,880

5. Proposed Use of Funds

A. State Implemented Programs

All programs outlined below will be implemented by the State of Louisiana. All eligible activities listed below are as provided by statute, as may have been amended by the Federal Register Notice or hereafter affected by waivers from HUD.

1. Housing

The state's housing programs will focus on assisting homeowners to reconstruct, rehabilitate, reimburse, and elevate their homes, as well as providing affordable rental housing for persons displaced by the storm through the rehabilitation and creation of rental housing stock and by providing rental assistance and support services to the most vulnerable persons displaced by the storm.

Allocation for Housing Activities Relative Percentage

Total Allocation for Housing Activities: $1,423,693,120 100%

Homeowner Program $1,293,693,120 90.87%

Rental Housing and Homelessness Prevention

Programs $ 130,000,000 9.13%

General Eligible Housing Activities: Rehabilitation, reconstruction, buyouts, and new construction; includes any rental housing for LMI households; public housing; emergency shelters and housing for the homeless; any other HUD-assisted housing; moving expenses; rental assistance; interim mortgage assistance; housing counseling services; acquisition; and buyouts. Funds may also be used for the creation of new units or rehabilitation of units not damaged by the flood events if the activity can be clearly linked to an impact generated by the flooding events in the Most Impacted/Distressed (MID) target area. Code enforcement is an eligible activity that will be considered by the state for the slate of housing programs. The following activities under the Housing and Community Development Act of 1974 (HCDA) are eligible: 105(a)1-11, 14-15; 18; 20; 23-25 as well as (42 U.S.C. 5305(a)(4)), (42 U.S.C. 5305(a)(6)); and FR 5989-N01

VI.B.28.

Ineligible Activities: Forced mortgage payoffs; SBA home/business loan payoffs; funding for second homes; compensation payments; and - as per 42 USC 5154a and the Federal Register Notice - no Federal disaster relief assistance shall be made available in a flood disaster area to make a payment (including any loan assistance payment) to a person for repair, replacement, or restoration for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property.

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SBA Declined Loans: Homeowners and property owners approved for SBA loans who declined their loans will be reviewed for eligible award amounts and duplication of benefits, per the state's program policies and procedures.

Elevation Requirements: New construction, substantially damaged, or substantial improvement of structures in the 1 percent annual (or 100 year) floodplain must be elevated (2' above Base Flood Elevation), per federal rules and regulations and local code enforcement requirements. The state has allocated other resources to a study that will assess the potential impacts of riverine basin projects on the flood levels of certain communities impacted by the 2016 Severe Storm and Flooding Events. While it is anticipated one or more infrastructure projects will have beneficial impacts on mitigating future flooding events in the impacted communities, these projects may not be complete prior to the implementation of the programs described herein. Therefore, in those cases where the state determines the cost reasonableness of rehab/reconstruction of an impacted structure, the state will follow federal elevation requirements until further assessment and notice.

Building Standards: New construction or replacement of substantially damaged buildings must meet green building standards and are strongly encouraged to meet a resilient home construction standard.

Flood Insurance: Applicants living in a SFHA that receive federal assistance under these programs must obtain and maintain flood insurance for rehabilitated or reconstructed properties.

Restore Louisiana Homeowner Rehabilitation, Reconstruction and Reimbursement Program

Summary: The state will enter into grant agreements with homeowners that result in the repair, reconstruction, elevation, acquisition and/or buyout of flood-damaged residential owner-occupied structures. Given the time elapsed from the March and August flooding events, homeowners are in varied states of progress in their rebuilding process depending on the extent of damage and resources available. In response, the state will implement the Restore Louisiana Rehabilitation, Reconstruction and Reimbursement Program to cover eligible costs for the repair or replacement of damage to real property; replacement of disaster-impacted residential appliances; and limited environmental health hazard mitigation costs related to the repair of disaster-impacted property.

Eligible Activity Rehabilitation, Reconstruction, Buyouts and Acquisitions (42 U.S.C. 5305(a)(4)); HCDA Sections 105 (a)(1), 105(a)(3-4), 105(a)(7-8)). Housing Incentive, as identified in Federal Register Docket No. FR-5989-N-01.

Also eligible are elevation expenses related to rehabilitation and reconstruction activities and reimbursement of eligible rehabilitation and reconstruction activities.

National Objective Urgent Need or benefit to low to moderate income persons

Geographic Eligibility: Disaster-declared parishes impacted by the 2016 Severe Storms and Flooding

Allocation for Activities:

Program Area First

Appropriation
Second
Appropriation
Total % of
Total
Homeowner Rehabilitation
and Reconstruction $385,510,000 $908,183,120 $1,293,693,120 80%
78
Administering Entity: State of Louisiana
Proposed Use of Funds: Homeowners will have four potential program solutions from which to choose based on their progress in the rebuilding process and their capacity to complete the rebuilding process. The state's programs will give homeowners the option to select their own contractor who will follow the state's requirements for rebuilding or work with a state-managed contractor. Additionally, homeowners that have completed partial or full repairs on their home prior to applying to the program, may be eligible to receive reimbursement for expenses incurred within HUD approved timelines. If homeowners have partially completed repairs or reconstruction of their homes at the time of application to the program, they may be eligible for assistance for prospective work as well as reimbursement assistance for eligible work completed within the HUD established reimbursement guidelines. Consistent with HUD reimbursement guidelines, certain limited reimbursement may become available for repairs performed after the homeowner has applied to the program. More details, including when repairs may be made and which expenses are eligible for reimbursement, will be made available with the publishing of the program's Policies and Procedures.
Elevations will be included for homeowners that meet requirements determined by the program, including substantially damaged properties in the floodplain. Elevation will be evaluated on a case-bycase basis. Elevations will not be conducted on properties outside of the floodplain, with the possible exception where elevation is required by local ordinance.
State staff and/or contractors will provide guidance to homeowners on the guidelines and requirements of each solution. Based on their individual conditions at the time of application, homeowners will choose the program solution that best fits their need.
Program Solutions:
Solution 1: Program Managed: Homeowners may choose to have the state manage and complete the construction process for the rehabilitation or reconstruction of damaged homes on their behalf. The state will contract with a pool of contractors and assign them to repair or reconstruct damaged properties. Homeowners will not select their own contractors and will not contract with the construction contractor. Homeowners will be required to enter into grant agreements with the state. Homeowners who have partially completed repairs on their home at the time of application may select to participate in Solution 1. These homeowners may also be eligible for assistance under Solution 3: Reimbursement for eligible costs incurred prior to application.
Solution 2: Homeowner Contracted Program: Homeowners may choose to manage their own rehabilitation or reconstruction process with the state providing construction advisory services for all homeowners in this solution. Homeowners will select their own homebuilding contractor(s) and contract directly with homebuilding contractors to rebuild as well as enter a grant agreement with the state for the CDBG-DR funding. The state will monitor all projects in the Homeowner Contracted Program. Homeowners who have partially completed repairs on their home at the time of application may select to participate in Solution 2. These homeowners may also be eligible for assistance under Solution 3: Reimbursement for eligible costs incurred prior to application.
Solution 3: Reimbursement: Homeowners who have completed partial or full repairs on their home prior to applying to the program may be eligible to receive reimbursement for expenses incurred within HUD approved timelines. Furthermore, certain limited reimbursement may
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become available for repairs performed after the homeowner has applied to the program. More details, including when repairs may be made and which expenses are eligible for reimbursement, will be made available at a later date with the publishing of the program's Policies and Procedures.

Homeowners who have partially completed repairs to their homes prior to application may also participate in Solutions 1 or 2 in order to complete the repairs or reconstruction of their homes.
The state will follow the guidance received from HUD and the CPD Notice 2015-07, "Guidance for Charging Pre-Application Costs of Homeowners, Businesses, and Other Qualifying Entities to CDBG Disaster Recovery Grants” when implementing Solution 3: Reimbursement. Furthermore, the state is in the process of consulting with the State Historic Preservation Officer, Fish and Wildlife Service and National Marine Fisheries Service, to obtain formal agreements for compliance with section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and section 7 of the Endangered Species Act (16 U.S.C. 1536).
Solution 4: Voluntary Buyouts or Acquisitions: Based on further analysis of unmet needs, the state may execute voluntary buyouts or acquisitions in limited situations where the state determines it is more cost effective to buyout or acquire a property from a homeowner.
Using data from prior acquisition and buyout programs implemented by the state and other HUD grantees, the program will establish an average cost of buyout that will be used as a threshold for cost effectiveness to determine whether voluntary acquisition or a buyout should be considered in lieu of a rehabilitation or reconstruction.
Generally, the state does not intend to elevate homes that are slab on grade and the state has put mechanisms in place to ensure all structures requiring elevation go through an analysis to determine whether a) rehab and elevation or b) demolition, reconstruction and elevation of the structure is the more cost effective approach to helping that homeowner get home. In both cases, the state will also evaluate the cost effectiveness of the chosen approach as compared to the cost of buying out or acquiring the property from the homeowner.
Through past experience, the state understands it can be more costly in the long-run to implement and maintain a buyout and acquisition program than a rehabilitation or reconstruction program; therefore when assessing the cost reasonableness of a buyout/acquisition approach as opposed to the a) rehab and elevation or b) demolition, reconstruction and elevation of a home, the state will consider the costs of acquiring a property at pre-storm value, potentially providing interim housing assistance to the family, ongoing property maintenance, title work, operational expenses and all other expenses necessary to reaching final disposition and national objective with the acquired property.
Following recent changes to FEMA's Severe Repetitive Loss program, which limit buyouts to neighborhood solutions to reduce unintended negative consequences of single buyouts to a neighborhood or jurisdiction, the state reserves the right to continue with a rehabilitation or reconstruction if the impact of a buyout on the neighborhood or jurisdiction could be detrimental.
Eligible Applicants: Homeowners will be eligible for the program if they meet the following criteria:
>> Owner occupant at time of disaster event
>> Damaged address was the applicant's primary residence at the time of disaster event
>> Located in one of 51 disaster declared parishes

>> Suffered major or severe damages (1+ feet of flooding or $8,000 FEMA Verified Loss) as a result of the 2016 Severe Storms and Flooding events
>> Eligible structure as determined by program, including but not exclusive to, one or two family home structures, mobile/manufactured, and modular homes
Due to limits in the funding available in the first two allocations, the state prioritized a first phase of the program impacted homeowners meeting the criteria outlined below. With additional funding made available in the second allocation, the state will expand program eligibility criteria to assist additional homeowners described above as Eligible Applicants with remaining unmet needs. This includes households of all income levels with primary residences located inside or outside of the floodplain that can exhibit a remaining need for funding to repair or rebuild their homes in keeping with the guidelines of the program. Due to the number of impacted homeowners eligible for the program, the state intends to fund eligible homeowners in phases. As the state collects additional data and information from FEMA, SBA, NFIP, other funding sources and real and potential homeowner applicants, the state may expand the criteria listed in the phases below to include homeowners who had a structural flood insurance policy at

the time of the flood and have an eligible remaining unmet need.
Phase I: The equally-weighted criteria for Phase One of the program include all of the requirements below:
>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by the program;
>> The applicant household meets federal Low- to Moderate-Income (LMI) requirements;
>> The applicant or co-applicant is elderly (age 62 on the date of the disaster event) OR is a person with disabilities or has a person with disabilities in the household;
>> The home is located outside the Special Flood Hazard Area (floodplain);
>> The homeowner has completed all work or has remaining prospective work to complete at the time of application; and
>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.
Phase II: The equally-weighted criteria for Phase Two of the program include all of the requirements below:
>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by the program;
>> The applicant household meets federal Low- to Moderate-Income (LMI) requirements;
>> The applicant or co-applicant is elderly (age 62 on the date of the disaster event) OR is a person with disabilities or has a person with disabilities in the household;
>> The home is located inside the Special Flood Hazard Area (floodplain);
>> The homeowner has completed all work or has remaining prospective work to complete at the time of application; and
>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.
Phase III: The equally-weighted criteria for Phase Three of the program include all of the requirements below:

>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by HUD;
>> The impacted home is located within one of the ten most impacted and distressed (MID) parishes;
>> The home is located outside the Special Flood Hazard Area (floodplain);
>> The homeowner has remaining prospective work to complete at the time of application; and
>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.
Homeowners who qualify under Phase III may be eligible for assistance for prospective work and reimbursement for work incurred prior to application, or within HUD approved guidelines.
Phase IV: The equally-weighted criteria for Phase Four of the program include all of the requirements below:
>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by HUD;
>> The impacted home is located within one of the ten most impacted and distressed (MID) parishes;
>> The home is located inside the Special Flood Hazard Area (floodplain);
>> The homeowner has remaining prospective work to complete at the time of application; and
>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.
>> Homeowners who qualify under Phase IV may be eligible for assistance for prospective work and reimbursement for work incurred prior to application, or within HUD approved guidelines.
Phase V: The equally-weighted criteria for Phase Five of the program include all of the requirements below:
>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by HUD;
>> The impacted home is located within one of the 51 Presidentially declared parishes;
>> The homeowner has remaining prospective work to complete at the time of application; and
>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.

>> Homeowners who qualify under Phase V may be eligible for assistance for prospective work and reimbursement for work incurred prior to application, or within HUD approved guidelines.

Phase VI: The equally-weighted criteria for Phase Six of the program include all of the requirements below:

>> The impacted home experienced Major/Severe Damages by either a FEMA-designation or have damage which meets the major/severe damage standard, as defined by HUD;

>> The impacted home is located within one of the 51 Presidentially declared parishes;

>> The homeowner has completed rehabilitation or reconstruction of their home at the time of application; and

>> The household did not have a structural NFIP (flood insurance) policy at the time of the flood.

Criteria for Selection: The prioritization criteria outlined above are weighted equally; therefore, the program will not give preference to any individual homeowner over another so long as all criteria have been met. In designing the eligibility and prioritization criteria, OCD-DRU has aimed to provide assistance as soon as possible to those determined to be most in need of such assistance. For a homeowner to receive assistance in Phase One of the program, all eligibility and prioritization criteria (as they are defined

above) must be met. Applications from applicants that meet all the criteria above will be processed as they enter the program. It is anticipated the state will be able to serve all homeowners who meet the eligibility and prioritization criteria listed herein. Criteria for selection will be further determined within the program policies and procedures based on availability of funds and number of applications.

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

Due to limited funding, the state will implement the program using two dual-tiered award approaches for a) prospective work (Solutions 1 and 2) and b) reimbursement (Solution 3). Below are the details of the two dual-tiered award approaches:

a) Prospective Work (Solutions 1 and 2)

>> At the time of application, homeowners still have repairs or reconstruction work to complete on their homes

>> Program completes an inspection and generates a scope of work based on economy grade materials

>> Program completes a duplication of benefits check

>> Program deducts the duplication of benefits from the scope of work

>> Program determines an eligible prospective award amount

>> Program applies the dual-tiered award approach:

a. Homeowners with household incomes of 0-120% Area Median Income are eligible for 100% of the eligible award amount for prospective work

b. Homeowners with household incomes of 120%+ Area Median Income are eligible for 50% of the eligible award amount for prospective work

b) Reimbursement (Solution 3)

>> At the time of application, homeowners may have completed all or partial repairs or reconstruction of their homes

>> Program completes an inspection and generates a scope of repaired work based on economy grade materials

>> Program completes a duplication of benefits check

>> Program deducts the duplication of benefits from the scope of work

>> Program determines an eligible reimbursement award amount

>> Program applies the dual-tiered award approach:

a. Low to moderate income households with either an owner/co-owner who is elderly (62+) or has a person with disabilities living in the home are eligible to receive 100% of their eligible reimbursement award amount

b. All other households are eligible for 25% of their eligible reimbursement award amount
Based on FEMA and SBA data, the current eligibility limitations described in the phased approach, the dual-tiered award structure and economy grade materials approach, the program currently anticipates serving around 36,510 homeowners through the program as currently budgeted. Using best available data, the state anticipates serving the following number (see table below) of homeowners in each of the phases. These numbers do not reflect a participant cap for each of the phases; the actual numbers served in each of the phases will be determined once the program is underway.

Projected Number of Homeowners Served per
Phase
TOTAL 36,510
Phase I 3,798
Phase II 4,504
Phase III 11,009
Phase IV 8,586
Phase V 2,972
Phase VI 5,642

Homeowners may provide personal funding to expand the program-approved scope of work or pay for higher quality materials. Further details will be outlined in the program policies and procedures.
Program Managed and Homeowner Contracted Programs – The sample award calculations below are based on if a homeowner is eligible for 100% of the eligible award amount. These award amounts are subject to the dual-tiered award approaches described above:

Example 1
Scope of Work $120,000
Duplication of Benefits
FEMA Assistance for Structural
Repairs to Home $12,000
SBA Loan for Structural Repairs to
Home $25,000
Total duplication of benefits $37,000
Maximum Eligible Award $83,000

Example 2
Scope of Work $100,000
Duplication of Benefits
84
FEMA Assistance for Structural
Repairs to Home $12,000
SBA Loan for Structural Repairs
to Home $20,000
Grant from a local non-profit to
purchase sheetrock $5,000
Total duplication of benefits $37,000
Maximum Eligible Award $68,000

Program Timeline: The State of Louisiana anticipates the launch of the Homeowner Program in the second quarter of 2017. Homeowners will initially complete a survey and then will be invited to apply to the respective phase of the program under which they claim to meet the respective criteria. As additional phases open for application review and processing, homeowners who qualified under previous phases may be able to apply to the program even as later phases are open. The state may add, expand or amend the program phases following updated assessments of unmet homeowner needs. The state will communicate which program phases are open for application through direct communication with homeowners who completed the survey and through the approaches in the state's outreach plan that will be undertaken by the state's program manager. The program will end when all funds are expended, or six years after the execution of the grant agreement with HUD.
Restore Louisiana Rental Housing Programs

Summary: The State of Louisiana will establish a portfolio of rental programs to address the immediate and long-term housing needs of low-to-moderate income families in the flood impacted areas. Due to the shortage of affordable housing stock, and to meet the unmet needs of renters in the community, it is imperative to provide solutions that address the immediate housing needs of displaced and vulnerable renters, but the state has designed programs and plans to provide the majority of funding allocated for rental programs on long-term recovery solutions that replace and create affordable housing stock. Each program will address rental availability, affordability and quality standards.

As stated in the 2014 Housing Needs Assessment conducted by LSU, Louisiana residents across the state are rent burdened. The floods of 2016 made the situation in many areas of Louisiana much worse. The vacancy rates dropped to about 1 percent and monthly rents increased. Currently, 720 low-income families are receiving FEMA Temporary Shelter Assistance (TSA), which is currently set to end in February 2017. New construction, substantially damaged, or substantial improvement of structures in the 1 percent annual (or 100 year) floodplain must be elevated to meet the higher standard of either federal requirements or local ordinance requirements.

Due to the limited amount of funding available, the state will underwrite applicants for feasibility, cost efficiencies and ability to meet the goals of the programs. Applicants will be prioritized based on meeting program eligibility requirements.

Geographic Eligibility: Disaster-declared parishes impacted by the 2016 Severe Storms and Flooding

Allocation for Activities:

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Program Area	First Appropriation	Second Appropriation	Total	% of Total
Rental Repair and In-fill, Multifamily Gap, Piggyback, Rapid Rehousing and PSH Support Services	$19,000,000	$111,000,000	$130,000,000	6%

Administrating Entity: State of Louisiana

Proposed Use of Funds: Programs may include: repair, rehabilitation of flood-damaged units; new construction to increase available rental units; assistance to pay for a defined period of rental assistance or support services; and assistance to pay for a defined period of flood insurance premiums for eligible program applicants.

Initially, the state will address the affordable rental housing needs through the activities defined below:

>> Repairing Rental Units (Repair and Infill Program and Multi-family Gap Program): The state has created options within the rental program that will enable some rental units to be restored within a few months. Property owners will be able to receive funds as a loan to repair units and in exchange the state will require affordable rents for qualified families.

>> Creating New Rental Units (Repair and Infill Program, Multi-Family Gap Program and Piggyback): Creating new rental units is another viable approach to provide needed relief for renters located in the damaged parishes. This program will utilize lots already owned and controlled by local nonprofits and units of local government. In partnership with local housing agencies such as redevelopment authorities and community housing development organizations as well as financial institutions, the state can assist the development of new and rehabilitated rental units within nine months to a year. The state will require affordable rents for qualified families.

>> Housing Assistance to Displaced Renters (Rapid Rehousing): Providing tenant-based assistance to families displaced by the floods who are also at risk of homelessness or experiencing homelessness.

>> Public Support Services (Rapid Rehousing and PSH Support Services): Providing wrap-around

support services to families displaced by the floods who are also at risk of homelessness and/or are in need of permanent supportive housing solutions

Duplication of Benefits: All rental programs will include a duplication of benefits review as part of the application review and award calculation process.

Eligible Applicants: Landlords with vacant units and/or units occupied by low-to moderate income families that were displaced by the flood, community development nonprofits, Public Housing Authorities (PHAs), Development Authorities, and Community Housing Development Organizations (CHDOs) and/or private entities.

Criteria for Selection: Applicants will be prioritized based on meeting program eligibility requirements. More specific prioritization criteria will be outlined in program policies and procedures. At this time, there are no specific prioritization criteria given more weight or value than others.

Program Timelines: The State of Louisiana anticipates launching the Restore Louisiana Rental Housing Programs in the second quarter of 2017. The program will end the earlier of when all funds are expended or six years after the execution of the grant agreement with HUD.

In-fill and Rehabilitation Rental Program

Summary: This program seeks to rehabilitate or create new affordable housing units through the creation of a fully or partially forgivable loan program.

Eligible Activity Rehabilitation, new construction, loan financing (HCDA Sections 105 (a)(4)); 105(a)(8-9); 105(a)(15)).

National Objective Benefit to low to moderate income persons

Program Budget $45,000,000

Proposed Use of Funds: Awards provided to landlords under the program for the repair or creation of affordable housing for low income families may be issued as a fully or partially forgivable or fully repayable loan for eligible rehabilitation, reconstruction or new construction costs, as defined in the program policies and procedures. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures.

Eligible Applicants: Community Housing Development Organizations; 501(c)3 and 501(c)4 Not-for-Profit Organizations; Public Housing Authorities (PHAs); development agencies of units of local government (public or quasi-public); for-profit entities registered under the State of Louisiana; or private landlords

Method of Distribution: The award will be issued as a loan or a grant to eligible applicants. The state will open an application process for all eligible property owners for a defined period of time, following a series of workshops in which program staff will provide technical assistance to potential applicants so they understand the requirements of the program. During the workshops, program staff will provide additional information on the application timeline, process and eligibility criteria. Landlords will be able to ask questions and understand the full requirements of the program. Potential applicants are not required to participate in the workshops in order to apply to the program; the program staff will conduct a series of outreach efforts in order to encourage impacted and eligible landlords to apply to the program. Each property will be underwritten to ensure project viability for completion and sustainability for the duration of the affordability period. The sequence in which the program will provide assistance to applicants is based on those who are able to first demonstrate how they meet the program criteria, complete their applications in a timely manner, provide all requisite support documentation, secure all funding necessary to complete and sustain the project in the short and long-term and have a reasonable timeline to begin construction.

Criteria for Selection: In order to be eligible for the program, applicants will be reviewed based on the following basic equally weighted criteria. Priority will be given to applicants able to meet the goals and requirements of the program in a timely and/or cost-efficient manner. If additional criteria are included in the program application review process, they will be described in detail in the public-facing program policies and procedures:

>> Owners of flood-damaged properties with 1-7 units in a single structure

>> Private landlords are eligible to apply to the program for the properties they owned prior to the flood events

>> Non-profit or public entities may be eligible if they have flood-damaged properties and/or vacant lots available for new construction
>> All applicants must secure a construction loan or other interim financing to complete the necessary repairs or construction; CDBG-DR funds will be funded upon satisfactory completion, as will be defined in the public-facing program policies and procedures;
>> Ability to provide and sustain affordable housing units for low income families for the requisite time period and terms established by the program; and
>> Cost reasonableness
Maximum Award: The maximum award will be the lesser of the cost of construction or limits set by the program below. Each project will be reviewed for duplication of benefits, financial feasibility and cost reasonableness. An applicant landlord may be eligible to receive multiple awards for multiple eligible properties. Awards per property will not exceed the following amounts for the following structure types:

Building Size	Maximum Award
Single Family Unit	$150,000
Double Unit	$250,000
Triple Unit	$315,000
Four Unit	$375,000
Five to Seven Units	$500,000

Affordability Requirements:
Definition of Affordable Rents: Housing is considered “affordable” if the rent (including utilities) is no more than 30 percent of a household's pre-tax income.
Number of Units: In order to be eligible for the program, at a minimum, the recipients must agree to meet the occupancy rule requirements established by HUD (see below). However, as will be detailed in the program guidelines, the state may require recipients to provide affordable housing to low-to-moderate income housing through additional units within assisted structures:
>> All assisted single unit structures must be occupied by L/M income households,
>> An assisted two-unit structure (duplex) must have at least one unit occupied by a L/M income household, and
>> An assisted structure containing more than two units must have at least 51 percent of the units occupied by L/M income households.
Duration of Affordability: The provision of affordable rents to qualified tenants will be required at a minimum for the initial lease-up, but longer affordability terms may be required. The duration of affordability may be tied to the amount of funding provided to the landlord. This will be further defined in the final program policies and procedures.
Multifamily Rental Gap Program
Summary: As noted in the unmet needs assessment, many properties outside the floodplain were not required to hold insurance and thus have no means to offset the cost of repair. For those property owners that had insurance, the cost of repair may not be fully met. Given these circumstances, each group of

property owners may face significant gaps to repair units. In addition, insurance rates may increase given the extensive nature of the disaster. It is anticipated that owners of large developments may have a financial burden in operation and cash flow, which will impact their ability to recover and offer long-term affordable housing to qualified renters
Eligible Activity Rehabilitation, loan financing (HCDA Sec. 105 (a)(4); 105(a)(9); 105(a)(14-15))
National Objective Benefit to low to moderate income persons
Program Budget $45,000,000
Proposed Use of Funds: Funding will be provided in the form of a loan to the property owners of floodimpacted
properties with 20 or more units to cover eligible unmet needs. Owners will be required to sign a completion guaranty, at a minimum. This program will provide assistance for eligible unmet needs related to the hard and soft costs of repair or reconstruction of eligible properties, subject to program

policies and procedures. Eligible flood insurance premiums may also be covered through program funds, subject to program limits. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures. New construction is not eligible under this program.
Eligible Applicants: For-profit and non-profit public and private property owners and developers of floodimpacted
properties; Public Housing Authorities. Both property owners of existing affordable housing properties and owners of market-rate properties are eligible to apply to the program. In return for program assistance, owners of market-rate properties must agree to convert at least 51% of their units to affordable units for eligible low income tenants for a defined period of time that is commensurate with the amount of assistance provided through the program.
Method of Distribution: Funding will be provided in the form of a loan or grant to the public and private property owners, developers or Public Housing Authority. The program will be implemented on a competitive basis. The program will be open for application for a defined period of time, as will be described in the Notice of Funding Availability to request applications from developers. Priority may be given to properties with existing affordability requirements; the details of the prioritization and application review process will be detailed in program solicitations issued by the state and/or the program policies and procedures.
Criteria for Selection: The program will address multi-unit developments in two categories:
>> Flood-damaged properties with 20 units or more; and
>> Properties in a Special Flood Hazard Area (floodplain) with the required flood insurance; or
>> Properties not located in a Special Flood Hazard Area (floodplain).
While priority may be given to properties with existing affordability requirements, the state may also invest in market-rate properties which have experienced flood-related damages but do not have sufficient funds to repair and restore the units, and whose property owners would commit to certain affordability requirements in return for repair funds. Priority will be given to those applicants who demonstrate the readiness, feasibility, sustainability and cost reasonableness of their projects.
Maximum Award: The maximum award will be set after determination of damage during program implementation. Each project will be reviewed for financial feasibility and cost reasonableness.
No payment will exceed a total amount of $65,000 per unit.
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Affordability Requirements:
Definition of Affordable Rents: Housing is considered “affordable” if the rent (including utilities) is no more than 30 percent of a household's pre-tax income.
Number of Units: In order to be eligible for the program, at a minimum, the recipients must agree to meet the occupancy rule requirements established by HUD (see below). However, as will be detailed in the program guidelines, the state may require recipients to provide affordable rental housing to low-tomoderate income housing through additional units within assisted structures:
>> An assisted structure containing more than two units must have at least 51 percent of the units occupied by L/M income households.
Duration of Affordability: The provision of affordable rents to qualified tenants will be required at a minimum for the initial lease-up, but longer affordability terms may be required. This will be further defined in the final program policies and procedures.
Program Timeline:
Piggyback Program
Summary: The state will develop a ‘piggyback' program that will seek to leverage CDBG-DR with low income housing tax credits (LIHTCs) or other sources to address the longer-term housing recovery needs in the impacted communities.
Eligible Activity Acquisition, clearance, rehabilitation, reconstruction, and new construction, elevation, loan financing HCDA Sections 105 (a)(1),(4) and
(14)
National Objective Benefit to low to moderate income persons
Program Budget $19,000,000
Proposed Use of Funds: Assistance will be provided in the form of loans for gap financing for mixedincome,

additional affordability, and PSH developments.
Eligible Applicants: For-profit and non-profit public and private property owners; Public Housing Authorities.
Method of Distribution: The Piggyback Program funds will be awarded to specific developments in accordance with a competitive funding process. The state will issue a competitive Notice of Funding Availability for a defined period of time, inviting eligible developers to apply to the program. The timing of the application period will coincide with the state's availability of Low Income Housing Tax Credits. The program will review and underwrite each project for eligibility, feasibility, leverage and cost reasonableness. Priority will be given to the most cost-effective projects.
Criteria for Selection:
Within the approved developments, the program will provide assistance to medium and large-scale affordable and mixed income rental housing developments, specifically:
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>> Workforce Housing Units. The program will facilitate the creation of mixed-income projects including market-rate units and units affordable to (and restricted to occupants by) households with incomes below both 80% and 60% of area median income (AMI).
>> Additional Affordability Units. The state will facilitate development of units affordable to (and restricted to occupancy by) households with incomes at or below 20% of AMI, 30% of AMI, and 40% of AMI.
>> Permanent Supportive Housing (PSH). The state will also facilitate the development of permanent supportive housing for a variety of households including extremely low income people (20% AMI and below) with serious long term disabilities, and/or who are homeless and/or who are most at-risk of homelessness.
o The primary strategy is a PSH Set-Aside Program, under which all properties that receive CDBG-DR funds will be required to make at least 5% of total units available to PSH clients, who will be supported by appropriate services. Additional incentives in the form of bonus points in the project selection scoring system may be awarded to projects that elect to assist greater than 10% of their units.
o An additional strategy is development of PSH properties in which at least 15%, but not more than 50% of the units are set-aside for PSH. PSH clients will be supported by appropriate services.
Maximum Award: The maximum award for which a project is eligible will be determined on a case-bycase basis after a project is thoroughly underwritten. Each project will be reviewed for affordable housing outcomes, financial feasibility and cost reasonableness. No payment will exceed a total amount of $65,000 per unit.
Rapid Rehousing Program
Summary: The state has established a model of Rapid Rehousing for households following disasters. The Rapid Rehousing Program (RRH) is based on an effective solution to address the needs of persons either experiencing homelessness or at risk of becoming homeless by providing a combined solution of assistance for affordable housing and support services that help households to be self-sufficient. This includes preventing homelessness whenever possible by rapidly rehousing people when homelessness is imminent and providing ‘wrap around' services that stabilize the cost of housing and supports selfsufficiency for the household.
Eligible Activity HCDA Sec. 105 (a)(4), 105(a)(8)
National Objective Benefit to low to moderate income persons
Program Budget $16,000,000
Proposed Use of Funds and Maximum Award: Funds may be used for up to 24 months of the actual costs for rental assistance, security and utility deposits, rental and utility arrearages, application and background check fees charged when applying for housing. Total monthly rental assistance for eligible program participants will be determined based on an evaluation of rent comparables and will be limited to a maximum of 24 months of monthly rental assistance. In addition, funds will be provided to the program subrecipients to provide wrap-around services to those families receiving rental assistance. The wrap-around services are critical to helping families become independent from the rental assistance.

Eligible Applicants: Displaced households at 30% AMI and below
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Criteria for Selection:
This program will provide rental assistance and support services to renters displaced by the floods who are experiencing homelessness or are at risk of becoming homeless. Populations deemed at risk of becoming homeless include very low and extremely low income families receiving Temporary Shelter Assistance (TSA) from FEMA and very low and extremely income families temporarily living with friends and family.
The program is limited to those individuals and families who experience a demonstrable hardship. The state has defined a family or an individual to be experiencing demonstrable hardship for this program if they were displaced by the flood and lack the resources to obtain housing on their own, are experiencing literal homelessness, are persons whose primary source of income was impacted by the flood, are experiencing health issues that were exacerbated by the flood and/or are persons with disabling conditions prior to the flood that are exacerbated by the flood.
Method of Distribution: The state will open the application period for 90 days, using the Disaster Case Management (DCM) team, a team implemented and administered by the Louisiana Department of Health and a network of non-profit organizations, in the selection process for eligible applicants. The DCM will perform applicant intake and will complete the review and eligibility determination. The state will make payments for eligible expenses directly to the landlords of eligible program participants.
Permanent Supportive Housing Services Program
Summary: Supportive housing has proven to be a very successful answer to preventing homelessness because it is a cost effective, community-friendly alternative to shelters that enables individuals to remain housed and achieve increasing levels of self-sufficiency. Supportive housing is permanent affordable housing linked to tenancy support services (health, mental health, employment) required to help individuals rebuild their lives after homelessness, institutional care or other disruptions. Tenancy support services include any service necessary to help a program participant maintain their rental unit, such as employment search support, physical and mental health support services, referral services to other programs and support networks, life skills training, reminders to pay bills on a regular basis, financial management and budgeting, etc. The support services provided through this program will assist individuals in transitioning to Permanent Supportive Housing and maintaining successful, long-term tenancies.
Eligible Activity HCDA. Sec.105(a)(8), 105(a)(11)
National Objective Benefit to low to moderate income persons
Program Budget $5,000,000
Use of Funds and Maximum award: Pre- and post-tenancy support services, up to $5,000 per year per person receiving services
Eligible Applicants: A household is considered to be in need of permanent supportive housing if all four of the following conditions are met:
1. A household member has a substantial, long-term disability including but not limited to serious mental illness, addictive disorder with a co-occurring disorder, developmental disability, physical, cognitive, or sensory disability, or a disabling chronic health condition, which substantially
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impedes that person's ability to live independently without supports; and is of such nature that the ability to live independently could be improved by more suitable housing conditions; and
2. The household member with the condition in (1) above is receiving Medicaid-funded or other funded supports and services operated or managed by the Department of Health and Hospitals program offices for Behavioral Health, Developmental Disabilities, Public Health or Aging and Adult Services, the U.S. Department of Veterans Affairs or local Continuum of Care; and
3. The supports or services in (2) above expressly include assisting the qualified member to get and keep housing; and
4. Have household incomes at or below 50% AMI.
Criteria for Selection: Households that are homeless, at risk of becoming homeless, living in an institution, or at risk of living in an institution will be prioritized.

Method of Distribution:
The program will use the existing state PSH program that serves as a model for the rest of the country. The state will work with Louisiana Department of Health and their existing subrecipient service providers to expand their program to target individuals displaced by the 2016 Severe Storms and Flooding. The application period will be open to all eligible participants until all funds necessary for the services are expended by program subrecipients.

2. Economic Revitalization

Restore Louisiana Economic Revitalization Programs

Summary: The state has allocated $62,000,000 to support economic revitalization in impacted areas through a suite of programs described below. The state understands that residential communities cannot fully recover and thrive without businesses returning to the community, as they provide essential services and employment to local residents. It is imperative that the state invest in those businesses that support recovering neighborhoods, provide local employment opportunities and produce the foods consumed directly or indirectly by local residents. In order to ensure these businesses remain viable and resilient in the face of future disasters, it is critical the state provide technical assistance to the impacted businesses. The state has prioritized businesses that experienced physical or financial losses as a result of the 2016 Severe Storms and Flooding and remain in need of immediate financial assistance to reopen or remain viable in the impacted communities.

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

>> Provide assistance to small businesses that provide income-producing jobs to residents of the disaster-impacted communities.

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

>> Provide assistance to farmers that produce the crops necessary to directly or indirectly feed the residents of the disaster-impacted communities and/or contribute to the economic stability of their communities.

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>> Adding to the local governments' and state's tax base through the generation of sales taxes, which in turn will allow these governments to continue to provide essential public services to the disaster-impacted communities.

>> Ensure the financial assistance invested in these programs is sound and secure through the provision of technical assistance to eligible businesses.

Geographic Eligibility: Disaster-declared parishes impacted by the 2016 Severe Storms and Flooding

Allocation for Activities:

Program Area	First Appropriation	Second Appropriation	Total	% of Total
Small Business Loan and Grant Program, Small Business Technical Assistance Program and Louisiana Farm Recovery Grant Program	$11,400,000	$50,600,000	$62,000,000	4%

Administering Entity: State of Louisiana and subrecipients

Proposed Use of Funds: Funds will be in the form of loans and/or grants to businesses, farmers as well as grants to entities that provide technical assistance services to businesses. Funds may be used for operating expenses (rent/mortgage, insurance, utilities, non-owner employee wages); replacement of movable equipment or inventory necessary for a business's recovery; and future crop needs. Funds may also be used to provide technical assistance services to businesses.

Duplication of Benefits: All economic revitalization programs will include a duplication of benefits review as part of the application review and award calculation process.
Ineligible Activities: Forced mortgage payoffs; SBA home/business loan payoffs; funding for second homes; assistance for those who previously received Federal flood disaster assistance and did not maintain flood insurance; and compensation payments.
SBA Declined Loans: Business owners approved for SBA loans who declined their loans will be reviewed for eligible award amounts and duplication of benefits, per the state's program policies and procedures.
Small Business Loan and Grant Program
Summary: The state will administer a lending program for disaster-impacted small businesses for nonconstruction
related expenses. The state will enter into subrecipient agreements with implementing
partners including local community development organizations (non-profit organizations, community development financial institutions, local credit unions, and other eligible organizations) who qualify under Section 105(a)15 of the HCDA. In the event the state is unable to identify local community development organizations that can serve the entire impacted area, the state may issue awards directly to small businesses that meet the program criteria.
Eligible Activity HCDA Section 105(a)8, 105(a) 14-15, 105(a) 17 and 105(a)21-22
National Objective LMI Job Creation and/or Retention, LMI Area Wide Benefit, LMI Limited Clientele, Urgent Need
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Program Budget $51,200,000
Proposed Use of Funds: Funds will be used for a package of partially forgivable loans or grants up to 20 percent with fully repayable loans up to 80 percent. Loan rates will be zero- to low-interest, amortized and repaid over a term outlined in the program policies and procedures. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures.
Eligible Applicants: For-profit businesses and private non-profit organizations located in parishes impacted by the 2016 federally-declared severe storms and flooding events.
Criteria for Selection: In order to be eligible for the program, businesses must meet the following equallyweighted
criteria. If additional criteria are included in the program application review process, they will
be described in detail in the program policies and procedures:
>> Are located in one of the 51 federally declared disaster impacted parishes;
>> Were operating prior to the respective flood events (March or August);
>> Employ 1 to 50 full time equivalent employees;
>> Generate a minimum of $25,000 annual gross revenue; and
>> Were directly impacted by the floods, as a documented physical or financial loss
While the state will continue to prioritize businesses that provide essential goods or services, with the addition of the second allocation, the state has expanded the pool of businesses to all Eligible Applicants defined above.
Note: Essential goods or services are considered to be those goods or services necessary for the immediate and long term housing and community recovery, which will be detailed in the program policies and procedures. Such goods and services may include grocery stores, pharmacies, healthcare providers, gas stations, residential construction-related companies, child care providers and locallyowned restaurants or residential service providers.
Assistance type: The state will decide whether the program awards will be issued to eligible businesses and non-profits in one of the following award structures:
a) 80 % loan and 20% grant; or
b) 80% fully repayable loan and 20% forgivable loan
Maximum Award: The program will provide standard awards of a maximum of $50,000, with exceptions allowing for up to a maximum award of $150,000. The state will include its exceptions policy in the program policies and procedures.
Loan interest rate and loan term: Zero to low interest rate loan, amortized and repaid over terms outlined in the policies and procedures.

Method of Distribution:
The state will issue a Notice of Funding Availability to secure subrecipient lenders who will implement the program on behalf of the state. Grants will be made to subrecipients who qualify under Section 105(a) 15 of the HCDA and who meet the requirements outlined in the NOFA, which include the lending applicants' demonstrated capacity to implement the flood recovery program in eligible parishes.

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The state will conduct extensive outreach to the business community and will open the application period for one month in the second quarter of calendar year 2017. The first phase of the program is limited to those businesses considered to provide an essential good or service. Applicant businesses and non-profits will apply to subrecipient lenders, who will underwrite the businesses for program eligibility, eligible expenses and financial viability. If additional funds are available after the first phase of the program, the state may open another phase of the program to include additional small businesses.

Program Timeline:
The state anticipates launching the program in the second quarter of calendar year 2017. The first phase of the program application will be open for one month. The state may implement additional phases if all funds are not expended in the first phase.

Small Business Technical Assistance Program

Summary: Business owners recovering from disasters are often in need of specific technical assistance to respond to losses to their businesses, whether it be a loss of employees or customers or a need for a new product that may present a growth opportunity for a business. Technical assistance providers support businesses to develop new business plans and continuity plans, reestablish lost financial records and data systems and create a disaster resilience plan to help prepare for future disasters.

Eligible Activity Section 105(a)8, 105(a) 15, 105(a) 17, and 105(a) 21-22
National Objective LMI, Urgent Need
Program Budget $800,000

The state will develop a program to provide technical assistance services to businesses to bolster the grant and loan resources and strengthen the business community.

Proposed Use of Funds: Grants will be awarded to subrecipients who will provide technical assistance services to small businesses and non-profit organizations. Technical assistance activities may include but are not limited to: development of business continuity plans; financial management guidance; and longterm recovery and sustainability plans for businesses impacted by the flooding events.

Eligible Applicants: For-profit small businesses and private non-profit organizations may be referred or request technical assistance either through the Small Business Loan and Grant program or else may request technical assistance directly from the subrecipients implementing the Technical Assistance program.

Method of Distribution:
The state will engage the Small Business Development Centers (SBDC) as subrecipients to the program. The SBDCs will provide the technical assistance services directly to businesses. SBDCs have a proven track record working within their business community and have a unique understanding of the challenges facing businesses in and outside their portfolio. SBDCs may provide technical assistance services to businesses within their portfolio as well as to those businesses referred to the SBDCs by the subrecipients implementing the Small Business Loan and Grant program.

Program Timeline:
The state anticipates launching the program in the second quarter of calendar year 2017, in conjunction with the Small Business Loan and Grant Program.

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Small Business Bridge Loan Program

Summary: The Louisiana Flood Bridge Loan Program provides banks a guarantee against losses for shortterm
bridge loans to assist businesses with immediate capital while they seek flood insurance, SBA assistance or other longer-term recovery assistance. The program will be designed to provide immediate, rapid financial assistance using existing banks as the conduit for businesses to gain access to the resources, and immediately useful in the short term of the first 12-18 months after the disaster.

Due to a change in allocation and funding priorities, the state will not administer this program at this time.

Louisiana Farm Recovery Grant Program

Summary: To assist the agricultural sector recovery from the 2016 floods, the Louisiana Department of Agriculture and Forestry (LDAF) designed the Louisiana Farm Recovery Grant Program (LFRGP) to assist individual farm enterprises impacted by the Great Floods of 2016.

Traditionally, the United States Department of Agriculture (USDA), via the Farm Bill and its crop loss programs, has addressed storm related losses. However, in 2008, substantial new changes were incorporated into the Farm Bill. Many of Louisiana's farmers would not qualify for recovery funds from this new USDA program; therefore, additional assistance is needed to fund the unmet needs faced by Louisiana producers.

According to LSU Ag Center, the combined $367 million in flood-related damages resulted in a total estimated economic impact of nearly 6 percent of typical farm value for the Louisiana agricultural industry. Moreover, most family farms face huge hurdles. Today just 19 cents of the retail food dollar goes to the farmer. This share represents a drop of more than 50 percent from what farmers received in 1950, leaving razor-thin profit margins, if any, for their families, and less money to spend in their local economies. Louisiana farmers are faced with the potential to lose money before the crop is even planted. They will not have the necessary income to cover farm expenses, and certainly will not be able to cover family living expenses including housing. This potential negative income not only affects the farmer, but also employees and local communities that rely on her/his business.

In Louisiana, farming supports not only the jobs generated by the farming operation, but also a number of agribusiness sectors ranging from farm machinery equipment to food processing plants. Sustaining the producers directly allows the agricultural industry to yield jobs and generates wealth for Louisiana's rural communities. Communities that lose family farms lose a base of committed employers and consumers, causing more businesses to shut their doors, shrinking the local tax base and ultimately leading to population loss. This pattern drains local businesses and can decimate the social fabric of rural communities, increasing unemployment rates and placing a higher demand on access to affordable rental housing. If farmers are faced with a lack of access to adequate recovery resources, when compounded with an aging farming population and an exodus of rural youth to urban areas, previously vibrant farming communities will experience a sharp decline. The jobs and the salaries that come with the farm and agricultural industry allow people in agriculture to remain in their homes.

Furthermore, historically, producers commonly utilize their houses for collateral and in many instances the farm business operates out of their home. If the farm ceases to exist, the producer can no longer afford his/her home. The home will have to be sold if it was used as collateral for production loans. If the producers lose their homes there is limited housing stock available for relocation. If producers do not have

access to resources necessary to recover from the impacts of the 2016 floods, they may not be able to stay in their homes. This would force outmigration and make it difficult for communities to experience long-term housing and economic recovery. While these homes are not aggregated in densely populated neighborhoods, rural communities thrive on the network of residents living in the area. Closure of farms and the departure of residents unable to recover from the impacts of the floods would result in the unraveling of the social, community and residential fabric of Louisiana's flood-impacted rural communities.

The LFRGP will provide $10 million to eligible impacted farms in all of Louisiana's disaster declared parishes. The program targets farms that are deemed viable – having a chance to survive and able to contribute to the economy while maintaining and creating rural jobs. Funds will be available via a direct grant to the farm. Farms assisted via the program are expected to plant a crop in 2017. Farms must be able to provide a plan detailing an acceptable use of funds including showing how they would use the grant, specifically what they intend to plant, anticipated acreage and proposed timeline for their goal.

The Louisiana Agricultural Finance Authority (LAFA, also referred to as “the Authority”) is a public agency organized pursuant to Louisiana Revised Statues 3§264 et al. and regulations promulgated. Through LAFA, with administrative assistance provided by LDAF, the state will implement, manage, and monitor LFRGP. Use of the expertise of LAFA will provide greater efficiencies in program delivery and ensure that accountability and transparency are achieved, as LAFA and the farming industry have an established working relationship with other federal disaster recovery programs.

Eligible Activity 105(a)(17)

National Objective Urgent need or benefit to low to moderate income persons

Program Budget $10,000,000

Proposed Use of Funds: Farmers may use the proceeds from the grant program to pay off existing crop production loans that were originated to initiate production damaged or destroyed by the 2016 floods. Pre-existing loans that were used for production of crops damaged by the 2016 floods may only be serviced from the proceeds of this grant program following a commitment from a lending institution to furnish sufficient funding for preparation, planting, management and harvesting of the 2017 crop. Funds may not be used for construction-related expenses. Reimbursement of eligible expenses may also be eligible and will be detailed in the program policies and procedures.

Eligible Applicants: To be eligible for funding, producers must meet the following equally-weighted criteria:

>> Must have been in operation during the 2016 growing season;

>> Must have received farm revenue in 2014, 2015 or 2016 of at least $25,000; and

>> Must have suffered at least $10,000 in losses, damages, displacement or substantial farming operation interruption as a direct result of either or both floods.

Method of Distribution: Applicants will apply to the Authority for funding during a defined application period. Requests for funds are expected to exceed the program's funding capacity. If the total request for eligible funds for all farms exceeds the total allocation, the Authority may pro-rata allocate funds to ensure that all eligible entities have access to some funds. The Authority may also use professional judgment to ensure that farms have access to capital.

Maximum Award: The maximum grant amount is $100,000.

Program Timeline: The State of Louisiana anticipates the launch of the program in the second quarter of 2017. The program will end when all funds are expended, or six years after the execution of the grant agreement with HUD.

3. Infrastructure

Summary: The flooding events of 2016 exposed vulnerabilities in the state's infrastructure system. The State of Louisiana identified over $207 million in infrastructure needs, including over $105 million in nonfederal share match for FEMA PA Projects throughout the state. Investments in infrastructure repair and rebuilding are necessary to secure the state's investment in housing repairs throughout impacted communities. These investments will bolster confidence in communities continuing to rebuild, as well as leverage the federal investment made in housing repair. Without assistance to meet the local match requirements, the public services, infrastructure and resources typically provided by state and local governments will be severely at-risk, as local governments will be required to either a) forgo assistance from FEMA PA or b) divert funding needed for other community needs toward meeting the match requirements. Communities need access to these critical public services and infrastructure improvements in order to realize long-term recovery and restoration of housing. The state will dedicate $105,000,000 to offset the burden of the non-federal share match requirements faced by state entities and local entities and jurisdictions.

Program Area	First Appropriation	Second Appropriation	Total	% of Total
Infrastructure: FEMA Public Assistance Nonfederal Share Match	$0	$105,000,000	$105,000,000	6%

FEMA Public Assistance Nonfederal Share Match

Many federal agencies, including FEMA, require jurisdictions to pay a percentage of the costs of disaster cleanup and recovery efforts. In the aftermath of catastrophic events, such as the Great Floods of 2016, the cost of this “non-federal share” of recovery can equal a significant portion of a jurisdiction's operating budget. Requiring a jurisdiction to pay this share can result in a burden on a locality's ability to continue normal operations in addition to meeting recovery needs. Recognizing that this requirement places a significant burden on localities, Congress has designated non-federal share as an eligible activity under CDBG-DR regulations, making it one of the few federal funding sources that can be used to offset a jurisdiction's non-federal match requirements.

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

National Objective Urgent need, benefit to low to moderate income persons, elimination of slums and blight

Activity Amount $105,000,000

FEMA provides funds to eligible applicants who must document disaster-related damages. As a cost sharing program, FEMA requires that the state certify that local applicants that receive FEMA funds have met the “local match” requirement. The federal/local cost-share ratio is normally 75% in federal funds

and 25% in state or local funds. Due to the catastrophic nature of the August 2016 Floods, the local costshare was decreased to 10%, thus, following the Great Floods of 2016, Louisiana's communities face two different non-federal cost share requirements:

Disaster	FEMA Public Assistance Nonfederal Share Match Requirement
DR-4263 (March 2016 Floods)	25%
DR-4277 (August 2016 Floods)	10%

Proposed Use of Funds: Funds will be provided as payment to state agencies, eligible organizations, local governments or other local entities for eligible activities within approved Project Worksheets (PWs). The state anticipates being able to fund the match requirements for all FEMA PA eligible projects.

Duplication of Benefits: The FEMA PA Match program will include a duplication of benefits review as part of the application review and award calculation process.

Eligible Applicants: All entities eligible for FEMA PA, under DR-4263 and DR-4277. Eligible applicants for FEMA PA include, but are not limited to, the following entities:

>> Parish and municipal governments
>> State agencies and authorities
>> Schools (K-12) and Universities
>> First responders
>> Critical infrastructure facilities as defined by FEMA (wastewater and drinking facilities)
>> Public Housing Authorities
>> Other parish and local program applicants eligible to receive federal recovery funds, including eligible private non-profit organizations

Maximum Award: The maximum award will be the lesser of the cost-share requirement or a pro-rata share based on available funding.

Program Timeline: The State of Louisiana anticipates the launch of the Restore Louisiana FEMA Public Assistance Non-federal Share Match Program in the second quarter of 2017. The program will end when all funds are expended, or six years after the execution of the grant agreement with HUD.

4. Vulnerable Populations

OCD-DRU, in coordination with the LHA, has designed a suite of programs that account for the specific needs of the state's most vulnerable populations, understanding that the funding allocated is not sufficient to serve all households in need of assistance. As is identified in the program descriptions above, the state is prioritizing the provision of funding to those most in need of assistance with its owneroccupied and rental housing programs.

Specifically, the homeowner program will prioritize low-to-moderate income individuals and families, elderly persons, and persons with disabilities. The design of the proposed portfolio of rental programs

creates affordable units as quickly as possible to provide immediate housing options to individuals and families that are currently homeless or at-risk of homelessness.

In addition to the programs proposed in this Action Plan, the state continues to work with its federal partners to continue to support vulnerable populations who remain displaced from the March and August floods through TSA and Disaster Case Management (DCM). Currently, FEMA has nearly 1,100 displaced households (comprising over 3,600 individuals) who are receiving TSA. This program, while temporary, is providing a much needed recovery function for vulnerable populations. The state, in coordination with FEMA, seeks to ensure that all households have a permanent housing plan prior to the exit from TSA. The programs proposed in this Action Plan will play a key role the transition.

Through DCM, the state works with five on-the-ground partners,such as Catholic Charities of the Dioceses of Baton Rouge, who provide direct case management for over 1,700 households. This crucial case management service for vulnerable populations ensures that they have access to critical resources to further their recovery needs. The state understands the gravity of the needs of the most vulnerable populations, and continues to work with state, local, and federal partners to provide recovery solutions and a safety net to this population.

Furthermore, the state has requested $92,000,000 in Social Services Block Grant funds to meet the needs of vulnerable populations through Health Delivery System to rebuild the health care needs of its populations through child care centers, child abuse prevention, mental health services for children, developmental disability services and mental health services for adults, child welfare services, child care services, and a call center/hotline designated to connecting residents with appropriate housing resources.

B. Leveraging Funds

1. Housing

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

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

Specifically, the state is working directly with FEMA and GOSHEP to implement the Shelter at Home Program, which provides emergency damage remediation for families so they can return home while rebuilding. To date the program has assisted over 9,400 households. While the Shelter at Home program allows for emergency repairs that are different from the long-term repairs funded through the CDBG-DR programs, further assistance through CDBG-DR funding will continue to leverage this initial federal investment from FEMA. Additionally, the state has committed existing Tenant Based Rental Assistance (TBRA) dollars to meet the immediate needs of renters in the impacted parishes. Existing state resources and other funds from the disaster appropriation will also be examined in an effort to ensure that all available funding is utilized where it is most needed.

Furthermore, the state has designed all of the housing programs in this action plan to cover the gap funding needed by leveraging insurance, private funds, and other assistance to complete the repairs from

the 2016 Floods. Understanding the limited funding for recovery, the state will encourage all applicants to seek out all other funding sources to meet their full recovery needs.

2. Economic Development

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

3. Infrastructure

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

4. Mitigation

The state is committed to a multi-pronged approach to addressing mitigation needs community wide. The state will leverage FEMA HMGP funds to implement large scale mitigation projects, which provide mitigation measures at the parcel level, yet impact a community as a whole. Leveraging mitigation dollars will allow for the state to invest in resilient infrastructure to rebuild impacted areas to standards that will reduce impacts from future flooding events. For example, the State may consider combining CDBG-DR funds to leverage HMGP funds used for strategic buyouts in a floodplain. Further details on mitigation projects will be outlined in future action plans.

5. Other Sources of Funds

As part of the state's ongoing recovery efforts, OCD-DRU leverages CDBG-DR funds with the following sources of funds which may include but is not limited to:

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

C. Contractor Standards and Appeals Process

Recovery programs implemented by the State of Louisiana will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to carry required licenses, insurance coverage(s) for all work performed, and state-contracted contractors will be required to provide a warranty period for all work performed. Contractor standards will be enumerated for each program (e.g. homeowners and rental property owners) in respective policies and procedures documents, and will pertain to the scale and type of work being performed. The state will implement an appeals process for homeowners, rental property owners and small business owners related to program eligibility and program application process. In

addition, the state will implement an appeals process for the Restore Louisiana state managed homeowner program to allow for appeals of rehabilitation contractor work that is not in keeping with established contractor standards and workmanship detailed in relevant policies and procedures manuals governing the respective program. In the state managed homeowner program, the homeowners will make an appeal to the state or its designated vendor to contest the work completed by the statecontracted homebuilding contractor. Details of the point of contact and procedure for submitting the appeal will be detailed in the program policies and procedures. In the homeowner managed program, the homeowner will resolve conflicts with the homebuilding contractor directly, as the state is not a party to the contract between the homeowner and the homebuilding contractor.

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

D. Planning and Coordination

The State of Louisiana has historically experienced flooding, coastal land loss, subsidence and wetland degradation with a significant portion of the southern half of the state below sea level, and the constant threat of tropical storms and hurricanes. Since the flooding and damage associated with hurricanes Katrina and Rita in 2005, followed by hurricanes Gustav and Ike in 2008 and Hurricane Isaac in 2012, the state has been proactive in undertaking measures that address resiliency and sustainability, as well as educating the public so that future risk for communities and individuals is minimized. Louisiana articulated its vision for a recovery that is “Safer, Stronger and Smarter” translated into the following actions:

>> Oversight for ensuring impacted parishes developed Long Term Recovery Plans as required under FEMA's ESF-14 in 2006;

>> State adoption of the National Building Code Standards in 2006;

>> Proactively ensuring parish adoption of the Advisory Base Flood Elevations (ABFEs) with concurrent adjustments in permits issued for new construction and height or elevation requirements issued after the respective adoptions;

>> Funding of “Louisiana Speaks” – a major regional initiative for all of south Louisiana reflecting visions and strategies for resiliency and sustainable growth practices (May 2007). More than 27,000 citizens, a historical first in the United States, participated in developing the plan. The 94-page document in hardcopy and disc and two subsequent publications: “Louisiana Speaks: Planning Toolkit” and “Louisiana Speaks: Pattern Book” were widely distributed to planners, government entities, local nonprofits and associations and citizens; and

>> The Coastal Protection Restoration Authority (CPRA) funded by the Louisiana Legislature to develop a 2017 Coastal Master Plan (CMP) with specific projects within each parish designed for protection of the coast and communities. CPRA collaborates extensively with a wide range of other federal, state and local agencies, has developed an interdisciplinary planning process that engages diverse groups of coastal stakeholders, focus groups, and national and international

experts in order to capture the wide range of perspectives and expertise necessary in developing a holistic coastal planning effort for the 2017 CMP. Under the CPRA effort, numerous supporting teams have been formed, which include:

o Framework Development Team (FDT) which serves as the primary cross-disciplinary collaborative group, consists of representatives from federal, state and local governments; NGOs; business and industry; academia; and coastal communities.

o Science and Engineering Board (SEB) which includes scientists and engineers with national or international experience who cover the range of disciplines, including socio-economics, coastal modeling, water and natural resources, urban planning, wetlands, fisheries, coastal geoscience, economic policy, and risk reduction

o Resiliency Technical Advisory Committee (TAC) is a small cross-disciplinary advisory group that offers working-level guidance and recommendations on the programmatic and policy measures needed to implement a comprehensive flood risk and resilience program. The TAC comprises experts in the areas of climate adaptation planning, community planning, socio-economics, social vulnerability, hazard mitigation, disaster planning, and environmental policy.

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

>> The state's template for the development of a disaster recovery proposal to use CDBG-DR funds at the parish level is being adapted to incorporate assurances that projects will reflect “unmet needs” as established in the state's Action Plan, as well as take into consideration and reflect:

o The Flood Recovery Strategy emanating from the NDRF;

o Local ABFEs and Flood Insurance Rate Maps (FIRMs);

o The parish Hazard Mitigation Plan required by GOSHEP;

o The parish's Long Term Recovery Plan (ESF-14);
o An assessment of local land use plans, zoning and floodplain management ordinances permit requirements;
o The Master Plan of the CPRA (where applicable); and
o Regional coordination with the respective regional planning commission.

This action will enable the leveraging of CDBG-DR funds with other funding sources and already identified priorities for sustainability and resiliency;

>> The state has guidelines on elevation and costs for specific types of housing and encourages coordination of CDBG-DR funding with FEMA's HMGP; and

>> The Pilot Comprehensive Resiliency Program, implemented in 2010 under funding from hurricanes Gustav and Ike, is a proactive program to develop and facilitate local planning that incorporates sustainability and resiliency into land use plans, zoning and floodplain management. The program funds were made available to local governments and non-profit entities in parishes impacted by hurricanes Gustav and Ike through a competitive application process. Twenty-nine communities were awarded grants through the competitive program. These projects include

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water management, floodplain ordinances, comprehensive plans, zoning codes and a plan for wetland carbon. In addition, 17 building code inspectors are funded for a two-year period in 10 communities to assist with enforcement and adaptation of permit policies and fees to allow for those communities to ultimately sustain the effort to manage growth, compliance and blight.

The education component of the Resiliency Program, through a joint venture with the LSU Coastal Sustainable Studio, has established a permanent online library, reflecting the plans developed through the Resiliency Program, criteria for determining sustainability and resiliency at the local level and educational tools. The OCD-DRU and LSU initiative includes a series of statewide webinars and workshops that provide national perspectives through recognized experts and local tools and strategies for implementation. Topics to date have included: “Gaining Economic Advantage through Environmental and Hazard Mitigation”, “Social Resilience: Bridging Planning and Communication through Technology” and “Retrofitting for Resiliency”. The Forum, “NFIP: Preparing for Changes to Flood Insurance” that was held June 17, 2013 was designed to help parishes and municipalities develop community-scale strategies that reduce flood risk and increase their scores on the Community Rating System. All webinars and workshops are available on the Louisiana Resiliency Assistance Program website at http://resiliency.lsu.edu/. Outreach for these sessions are statewide to elected officials, disaster recovery subrecipients, floodplain managers, planners, etc. Distribution is both by LSU, OCD-DRU and through partners such as the Louisiana Municipal Association, the Louisiana Chapter of the American Planning Association, the Floodplain Management Association and others. Therefore, in preparation of this Action Plan, the state has ensured that this document does not conflict with any existing regional recovery plans. The state will continue to coordinate with regional and local governments to ensure that all recovery efforts are aligned.

6. Citizen Participation

A. Citizen Participation Plan

The State of Louisiana developed a specific Citizen Participation Plan for disaster recovery from the 2016 Severe Storms and Flooding in compliance with CDBG regulations and all applicable waivers. The plan includes citizen participation requirements both for the state and also the parishes or other entities that will implement activities under this grant. The State's full Citizen Participation Plan is Appendix B of this document.

Citizens and other stakeholders will be given an opportunity for reasonable and timely access to information and a period for submitting comments relating to this Disaster Recovery Action Plan and any ensuing substantial amendments. Publication of the Action Plan, public comment, and substantial amendment criteria is located on the OCD-DRU website.

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

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

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The OCD-DRU website (http://www.doa.la.gov/Pages/ocd-dru/Index.aspx) will contain direct links to the Action Plan, amendments, reports and recovery programs and will be updated to provide additional information.

1. Citizen Input

The state has been in ongoing communications with its residents, local government leaders, state legislators and other stakeholders in communities impacted from both the March and August flooding events. This continuous outreach has helped identify the needs and priorities of the impacted communities and informs the programs set forth in this Action Plan.

OCD-DRU personnel have provided ongoing support within the parishes since the flooding events. State officials have held frequent calls and meetings with these and other impacted communities to discuss, among other things, the storms' effects on the local housing stock, infrastructure and business communities. These meetings have included seven public meetings held across the state as part of its Citizen Participation outreach associated with the first allocation of funds, as well as six public meetings of the Recover Louisiana Task Force.

2. Louisiana Disaster Housing Task Force

FEMA's NDRF is a guide that enables effective recovery support to disaster-impacted states, tribes, territorial and local jurisdictions. It provides a flexible structure that enables disaster recovery managers to operate in a unified and collaborative manner. It also focuses on how best to restore, redevelop and revitalize the health, social, economic, natural and environmental fabric of the community and build a more resilient Nation. As part of Louisiana's framework, the Disaster Housing Task force was created and implemented following Hurricane Isaac. Immediately following the March floods, the Louisiana Disaster Housing Task Force (Task Force) was activated and remained in effect throughout the August flooding event. The Task Force includes: state personnel from OCD-DRU, GOHSEP, the LHC and the state Department of Children and Family Services (DCFS); representatives from HUD and FEMA; and members from the local Voluntary Organizations Active in Disaster (VOAD).

The Task Force has played an essential role in maintaining contact with the leaders of the impacted parishes, assessing needs on the local level and providing data as needed. The state's outreach efforts will continue throughout the duration of the program planning and recovery process, in accordance with the Citizen Participation Plan.

3. Restore Louisiana Task Force

In response to the flooding events in March and August, Governor John Bel Edwards enacted the Restore Louisiana Task Force (RLTF), charged with overseeing the state's recovery efforts from flooding events in 2016. The RLTF comprises key stakeholders from the public and private sectors who represent the entire state, including impacted parishes. Their roles as elected officials or advisory roles in the community position them to provide strategic direction to create policy and advise the governor and OCD-DRU staff in the aftermath of the 2016 Severe Storms and Flooding.

Furthermore, the RTLF establishes and recommends to state and local agencies both short and long-term priorities in developing plans for recovery and redevelopment. These priorities and plans focus on the following areas: housing rehabilitation and redevelopment; economic and workforce development; education, infrastructure and transportation; healthcare; fiscal stability; family services; and agriculture.

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Additionally, the RLTF coordinates with GOSHEP, OCD-DRU, and the affected parishes and municipalities to assist in collecting and analyzing data about the ongoing residential, business and public infrastructure needs for recovery, identifying additional sources of federal funding, and sets priorities and offers direction to OCD-DRU and GOHSEP related to the use of funds made available through the Robert T. Stafford Disaster Relief and Emergency Assistance Act and any additional available federal funds.

The state's template for the development of a disaster recovery proposal to utilize CDBG-DR funds has been adapted to incorporate the NDRF process. As a function of the Restore Louisiana Task Force, Task

Force members engage in smaller working group sessions to deliberate and recommend program strategies related to particular recovery areas. These working groups have been structured to mirror the Recovery Support Functions (RSF) outlined in the NDRF: Community Planning and Capacity Building; Economic Recovery; Health and Social Services; Housing; Infrastructure Systems; and Natural and Cultural Resources. Each working group has been assigned an OCD-DRU staff member responsible for ensuring that local, state and federal members of the RSFs are invited and encouraged to participate in each of the RLTF working group sessions. By combining these functions, the state has been able to draw upon and incorporate the expertise, strategies and perspectives from local, state and federal stakeholders in the initial and ongoing programs design process.

The RLTF also establishes a federal and state legislative agenda for the recovery and redevelopment effort and for coordinating between levels and branches of government to implement that agenda. The RLTF comprises 21 voting members representing the impacted parishes and communities of Louisiana.

4. Consultation with Units of Local Government, Tribes and Stakeholders

With 56 parishes impacted by the 2016 Severe Storms and Flooding, the state has continued ongoing dialogue and consultation with all Units of Local Governments (UGLGs), stakeholders and tribes during and after the direct impacts of the disasters. OCD-DRU's outreach team provides daily support to many of the impacted parishes and has conducted technical assistance and assessment meetings with impacted parishes. Additionally, OCD-DRU staff has consulted with representatives from local chambers of commerce, financial institutions, non-profit organizations and community development financial institutions to seek input on the experiences of residents and businesses following the storms. Input from these stakeholders hasinformed the initial program design and ongoing consultation will incorporate best practices and local knowledge into the development of program policies and procedures.

For specific consultation on Action Plan development, the state worked with both the Louisiana Municipal Association (LMA) and the Louisiana Police Jury Association to conduct webinars to provide a platform for UGLGs, non-entitlement, entitlement communities to provide input and consultation. Additionally, through the RSF 1 – Community and Capacity Building (RSF 1) of the Task Force, OCD-DRU staff in coordination with FEMA and GOHSEP have conducted numerous meetings with UGLGs to advise and assess ongoing recovery needs.

In conjunction with the NDRF, the state hosted the Louisiana Symposium on Recovery and Resilience on December 8, 2016, which provided impacted parishes and municipalities with an opportunity to learn about and share best practices. The one-day event included 184 participants representing 18 floodimpacted parishes. The Symposium provided the following to attendees:

>> The opportunity to hear from and dialogue with peers and subject matter experts with experience in addressing recovery issues and resilience in Louisiana and other parts of the nation.

>> Information about regional and state watershed management within Louisiana with an opportunity for a targeted discussion on implementation going forward.

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>> Specifics on how the State of Louisiana's approach to responding to the needs created by the floods.

The symposium included seven breakout sessions, including panels and feedback on risk reduction, resilient implementation, and long term community planning and recovery. The event will be followed up by other statewide training opportunities and targeted workshops in individual communities as needed.

The RSF 1 Planning and Capacity Committee is developing a Community Long-Term Planning Process specifically for Louisiana, building off of the state's Stronger Communities Together process, which has been successful in 32 communities across the state. All six RSF's are participating in the development of the template and will participate in the implementation to be provided to the ten most impacted communities. GOHSEP, FEMA, and OCD-DRU will collaborate to provide oversight of the project. The process is being modified to include: (1) guidance on how to set up a local planning advisory group consisting of a diverse set of key stakeholders who will champion and follow-up on implementation; (2) guidance on the public process of getting residents educated and involved in all aspects of the development of the plan so that they are knowledgeable and supportive of decisions going forward; (3) redesigning the elements to be addressed to reflect the six RSF's as the core – planning/capacity, infrastructure, housing, economic development, health and social resources, natural and cultural resources, and a resilience and hazard mitigation component; and (4) guidance on resilience and hazard mitigation criteria for any projects identified and prioritized so that they are designed to reduce risk. The criteria mirror what has been developed for the LA SAFE initiative to ensure coordinated efforts and common messaging within local communities and across the state as a whole.

Timeline for a statewide training kickoff is April 2017 with a goal for all communities impacted by 4277 and 4263 to have a resiliency/recovery strategy within six months. Targeted follow-up and support will be provided to the ten most impacted communities throughout the process to ensure this effort is expedited and done as models for other communities within the state and as a template for the NDRF nationally. Support includes on the ground staff support, review of existing hazard mitigation/comprehensive land use plans, education on mitigation/resiliency strategies and best practices, tracking community input, etc.

Combined outreach efforts between GOSHEP, FEMA and OCD-DRU have already been conducted to conduct preliminary capacity assessments and get buy-in from local leadership and stakeholders for the Community Long Term Planning Process.

Through the Governor's Office of Indian Affairs, the state conducted outreach to the ten state recognized tribes after both the March and August flooding events. Two of the ten tribes are located within the impacted parishes, and the state is committed to working with these tribes to ensure that the recovery needs are being addressed.

Additionally, the Governor's Office of Indian Affairs has completed outreach to the four federally recognized tribes and continues to assess impacts and needs of the tribes to ensure recovery needs are being addressed at the state and federal level.

Because of the widespread impact of the flooding events, the state is committed to ongoing consultation through regional public meetings, the RLTF, meetings with UGLGs and tribes in impacted parishes and with the public to ensure the continuation of robust consultation efforts with these key groups throughout the recovery process.

B. Citizen Complaints

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

C. Receipt of Comments

This Action Plan was posted for public comment on February 1, 2017. The plan was posted online in English, Spanish, and Vietnamese. Public notices were published in eight newspapers, including The Advocate, the state's journal of record, and a press release was also distributed.

D. Amendments to the Disaster Recovery Action Plan

1. Substantial Amendments

Per 81 FR 83254,substantial amendments are defined by a change in program benefit or eligibility criteria; the addition or deletion of an activity; or the allocation or reallocation of a monetary threshold specified by the grantee. For purposes of this allocation of funding, the state will define the threshold for a substantial amendment as the greater of a re-allocation of more than $5 million dollars or a reallocation which constitutes a change of 15 percent or greater of a program budget.

Only those amendments that meet the definition of a substantial amendment are subject to the citizen participation process.

2. Submittal of Amendments

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