

State of Louisiana Proposed Master Action Plan

FOR THE UTILIZATION OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS

In Response to Hurricane Francine

Version: 1.0 Published for Public Comment: March 5, 2025 Public Comment Period: March 5 — April 4, 2025



Introduction

In 2024, Hurricane Francine struck the state of Louisiana, causing widespread devastation across the state. This powerful storm brought flooding, damaging winds, and storm surges that overwhelmed infrastructure, caused widespread power outages, and left lasting impacts on housing, public facilities, and local economies. Hurricane Francine was declared a major disaster under FEMA DR-4817.

The disaster compounded pre-existing vulnerabilities in many communities, particularly those with limited resources and access to recovery support. This Action Plan outlines Louisiana's proposed recovery and mitigation efforts, using CDBG-DR funds to address the impacts of the and enhance resilience against future events.

The recovery programs described in this Action Plan prioritize resilience, focusing on addressing the unmet needs of vulnerable populations and implementing resiliency measures to reduce risk. By integrating long-term planning and innovative approaches into the recovery process, Louisiana aims to ensure a more sustainable and resilient recovery for all affected communities.



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Versions and Amendments

Table 1: Change Log

Version (Date)	Summary of Changes Made
Version 1.0 (March 5, 2025)	



Executive Summary

Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Louisiana will receive \$117,946,000 in funding to support long-term recovery efforts following Hurricane Francine (FEMA DR-4817-LA) through the Louisiana Office of Community Development - Disaster Recovery (LOCD-DR). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet needs in Louisiana. To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$117,946,000 in CDBG-DR funds to the State of Louisiana in response to Hurricane Francine (FEMA DR-4817-LA) through the publication of the Federal Register FR-6512–N–01. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158).

Disaster-Specific Overview

Hurricane Francine (DR-4817-LA), the sixth named storm of the Atlantic hurricane season, and the first hurricane to make landfall in Louisiana since 2021, struck approximately 30 miles south of Morgan City in Terrebonne Parish as a Category 2 hurricane on September 11, 2024. The storm produced sustained winds of 100 mph and generated a storm surge exceeding four feet. Prolonged heavy rainfall led to widespread flooding across the state's southern region. New Orleans recorded between 6 and8 inches of rainfall, triggering flash flood emergencies and severe street flooding in surrounding parishes such as St. James and Jefferson. In Lafourche Parish, first responders rescued 26 people from floodwaters.

In response to the storm, the State issued mandatory evacuations for Grand Isle, Lafitte and Barataria. Curfews were implemented in Lafourche, Terrebonne and Washington Parishes, while St. Mary and Terrebonne Parishes raised their floodgates. Sandbags were distributed in Iberia and East Baton Rouge parishes. Louis Armstrong International Airport canceled all flights, and the United States Postal Service (USPS) temporarily closed five locations. Additionally, Port Fourchon, a major supplier to offshore oil producers, and the Louisiana Offshore Oil Port, suspended operations. Approximately 450,000 residents experienced power outages, most caused by fallen debris, and about 500 people sought refuge in emergency shelters.

Francine's strong winds brought down numerous trees and power lines, blocking roads and causing widespread disruption. Heavy rainfall led to significant street flooding, with flash flood emergencies issued across multiple



areas. Several rivers crested in St. Tammany Parish, worsening conditions in the area. In Lafourche Parish, the Sheriff's Office conducted numerous water rescues northwest of Thibodaux, evacuating residents –including small children—from housing units surrounded by rising floodwaters. Other water rescues took place in the Thibodaux and Kraemer areas. In New Orleans, a 39-year-old man rescued another driver from a sinking truck below an overpass by smashing the truck's rear window with a hammer and pulling him to safety, injuring his hand in the process. Two others were injured during the storm: a Louisiana State Police officer was struck by a falling tree while clearing debris on Interstate 10, and a woman in Ascension Parish was pinned beneath a fallen tree.

According to property data company CoreLogic, insured losses from Hurricane Francine could reach \$1.5 billion. Moody's Analytics estimates the total damage to exceed \$2 billion, while AccuWeather projects losses surpassing \$9 billion.. Entergy reported peak outages in Louisiana affected 250,980 customers, with the hardesthit areas being Lafourche, Terrebonne, Assumption and Ascension parishes — regions that experienced some of the strongest winds. The storm caused significant damage to the power grid, affecting 32 transmission lines and 25 substations, approximately 40 utility poles, 20 transformers, and 150 spans of wire.

On September 16, 2024, President Biden issued a major disaster declaration for the state of Louisiana, authorizing the release of federal funds to support recovery efforts. This declaration made FEMA's Individual Assistance (IA) program, as requested by Governor Jeff Landry, available to eligible individuals and households affected by Hurricane Francine. As part of this designation, FEMA approved IA for nine parishes: Ascension, Assumption, Jefferson, Lafourche, St. Charles, St. James, St. John the Baptist, St. Mary and Terrebonne.



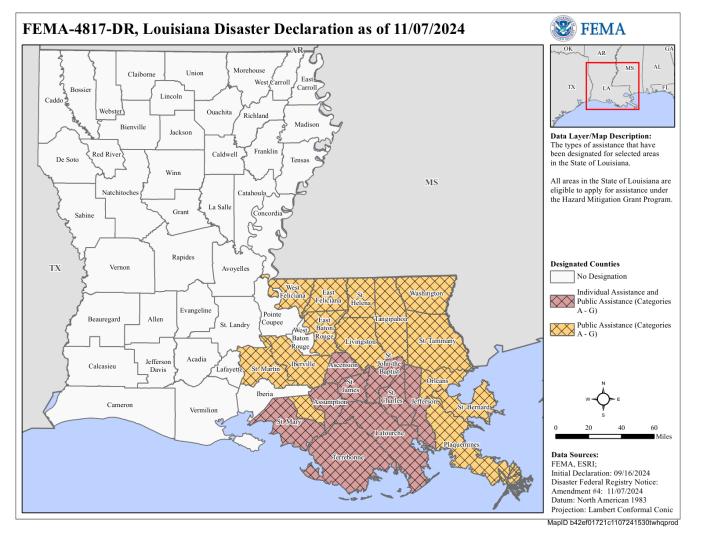


Figure 1: Map of FEMA-4817-DR, Louisiana Disaster Declaration as of 11/07/2024

Most Impacted and Distressed Areas

HUD identified MID Areas

HUD requires CDBG-DR funds to be used to address unmet needs in the Mos Impacted and Distressed (MID) areas resulting from qualifying disasters. Louisiana is required to spend at least 80 percent of its CDBG-DR funds, or \$94,356,800, to benefit the HUD-identified MID areas. According to the Allocation Announcement Notice (AAN), HUD has identified the following MID areas in Louisiana: Ascension Parish (ZIP code 70346); Assumption Parish (ZIP codes 70341, 70390); Jefferson Parish; Lafourche Parish; St. John the Baptist Parish (ZIP codes 70068, 70084); St. Mary Parish; Terrebonne Parish.



The State of Louisiana has chosen to expand the HUD-identified MID areas in ZIP codes 70346, 70341, 70390, 70068, and 70084 to include the entire parishes of Ascension, Assumption, and St. John the Baptist.

Grantee-identified MID Areas

The State of Louisiana will designate St. Charles and St. James as State MIDs. Both parishes have been for FEMA Public Assistance and Individual Assistance (Categories A-G) under DR-4817-LA. St. James experienced a verified loss of \$4,058,467, with 2,242 units damaged, while St. Charles reported a verified loss of \$2,008,757, with 1,781 units damaged. With thousands of units impacted and over \$6 million in verified losses across the two parishes, the state believes that designating these parishes as MIDs is essential to the state's overall recovery efforts.

Overview of the Impacts of the Qualifying Disaster

Louisiana residents are working to rebuild and recover from Hurricane Francine in 2024, following six federally declared disasters within just two years amid an ongoing pandemic. Hurricane Francine swept through a swath of rural Louisiana, which is vital to the state's economy, particularly the agriculture industry, still recovering from the storms of 2020-2021.An LSU AgCenter analysis¹ estimated the total economic impact of Hurricane Francine at approximately \$55.3 million with roughly 98 percent of this total attributed to soybeans and sugarcane. Excessive rainfall caused significant harvest delays for soybeans, resulting in both yield loss and quality damage. In many instances, the losses were so severe that the soybeans were completely abandoned and not harvested. High winds and flooding led to lodged sugarcane and reduced production, particularly in the southeastern portion of the state's sugarcane production region.. Additionally, excessive rainfall and flooding led to replanting some sugarcane acres. Other affected commodities included rice, cotton and sweet potatoes.

¹ Louisiana State University AgCenter. (2024). Economic Impact of Hurricane Francine on Louisiana Agriculture. LSU AgCenter.



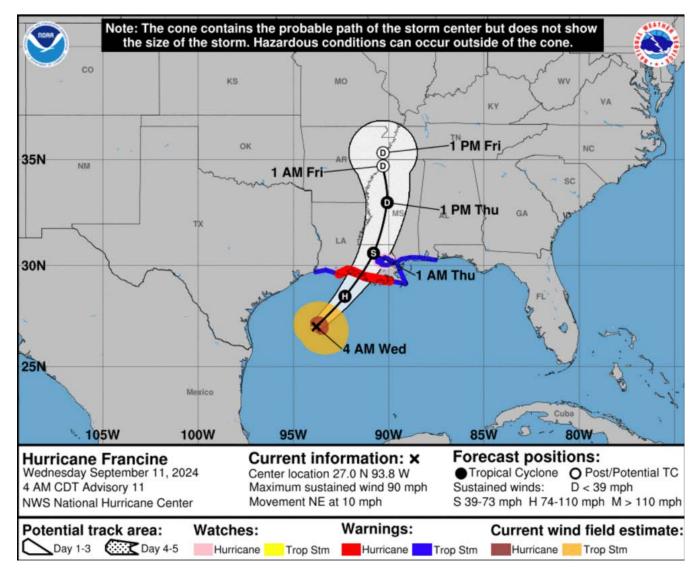


Figure 2: A map of Hurricane Francine's probable path released Wednesday, September 11, 2024.



Table 2: Disaster Overview

Disaster Summary	
Qualifying Disaster:	Hurricane Francine (DR-4817-LA),
HUD-identified MID Areas:	Ascension Parish (ZIP code 70346); Assumption Parish (ZIP codes 70341, 70390); Jefferson Parish; Lafourche Parish; St. John the Baptist Parish (ZIP codes 70068, 70084); St. Mary Parish; Terrebonne Parish
Grantee-Identified MID Areas	St. Charles and St. James Parish

Table 3: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation for Unmet Needs:	\$102,562,000
CDBG-DR Mitigation Set Aside:	\$15,384,000
Total Allocation:	\$117,946,000



Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessments Summary

Table 4: CDBG-DR Program Allocation and Funding Thresholds

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Allocation Amount	% of CDBG- DR Allocation*
Administration (5% cap)	N/A	N/A	100%	\$5,897,300	5%
Planning (15% cap)	N/A	N/A	100%	\$2,000,000	2%
Rental Housing	\$34,425,000	7%	0%	\$0	0%
Owner-Occupied Housing	\$434,511,000	85%	100%	\$110,048,700	93%
Infrastructure	\$36,552,360	7%	0%	\$0	0%
Economic Revitalization	\$7,833,053	2%	0%	\$0	0%
Public Services (15% cap)	\$0	0%	0%	\$0	0%
Exempt Public Services (no cap)	\$0	0%	0%	\$0	0%
Total	\$513,321,414	100%	100%	\$117,946,000	100%
Funds that have not been allocated:				\$0	0%



Unmet Needs Assessment

Overview

In accordance with HUD guidance, the State of Louisiana conducted an unmet needs assessment to identify priorities for CDBG-DR funding allocated in response to impacts from Hurricane Francine.

HUD identified the following areas as Most Impacted and Distressed (MID) from Hurricane Francine: Ascension Parish (ZIP code 70346); Assumption Parish (ZIP codes 70341, 70390); Jefferson Parish; Lafourche Parish; St. John the Baptist Parish (ZIP codes 70068, 70084); St. Mary Parish; and Terrebonne Parish. Additionally, Louisiana has designated St. Charles and St. James Parish as State MIDs. The MID areas experienced significant housing damage, with more than 28,000 units impacted, representing 84 percent of all damaged units across the state. Terrebonne Parish alone reported damage to more than 6,000 units.

The housing needs assessment below provides outcomes of two distinct methods for assessing unmet needs. Table 5 provides summary comparison of disaster impacts using federally available data from DR-4817, using an SBA–FEMA multiplier methodology similarly outlined in the Federal Register Notice. The standard unmet need is calculated by subtracting the available resources from the total damages. For reasons discussed below, the standard assessment significantly undervalues the remaining costs of damages and repairs from DR-4817. The State also conducted an assessment of housing needs using an alternative methodology derived from actual household recovery costs of homes experiencing over \$3,000 damages , which have been assisted through the State's Hurricane Ida Restore Louisiana Homeowner Assistance Program. Actual costs for owner-occupied recovery far exceed estimates derived from standard methodology, and are more reflective of the actual unmet need, which the State anticipates exceeds \$400 million, for homeowner recovery alone.

For both methodologies, the assessment focuses on statewide impacts, with specific sections detailing needs within the most impacted areas, and where relevant, smaller geographic units. Impacted parishes sustained damage due to severe storm flooding, wind, and excessive rainfall.

To this the state adds additional unmet needs of local cost share required for FEMA PA and HMGP grants, the need to invest in critical infrastructure to reduce the likelihood of repeated flood disasters in the region, and the estimated needs of commercial entities. The total of all unmet needs for CDBG-DR calculated by the state with the latest information is approximately \$513 million.



 Table 5: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Categories Affected	A Total Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Owner-Occupied Housing	*	*	\$434,511,000
Rental Housing	*	*	\$34,425,000
Infrastructure	\$153,667,728	\$117,115,368	\$36,552,360
Economic Development	**	**	\$7,833,053
Total			\$513,321,414

*Because the alternative method for housing needs assessment accounts for FEMA and SBA duplicative assistance through RESTORE closing costs, the table displaying Total Need (A) and Financial Assistance Budgeted and Obligated (B) and aid is left blank.

**Because the analysis of unmet business needs is calculated by multiplying business loss by decline loans, the table displaying Total Need (A) and Financial Assistance Budgeted and Obligated (B) and aid is left blank.

The information collected through the unmet recovery and mitigation needs assessment process serves as the foundation for the State's program funding and prioritization decisions.

To prepare this assessment, the Louisiana Office of Community Development – Disaster Recovery drew on data from the following sources:

- Census/ACS
- U.S. Department of Housing and Urban Development (HUD)
- Federal Emergency Management Agency (FEMA)
- U.S. Small Business Administration (SBA)
- Louisiana Coastal Protection and Restoration Authority (CPRA)
- Louisiana Economic Development (LED)
- Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP)
- Louisiana Housing Corporation (LHC)
- Louisiana State University AgCenter (LSU AgCenter)
- Louisiana State University Economics & Policy Research Group



- State of Louisiana Hazard Mitigation Plan (SHMP)
- Hazard Mitigation Plans for Ascension, Assumption, Jefferson, Lafourche, St. John the Baptist, St. Mary and Terrebonne
- U.S. National Oceanic and Atmospheric Administration (NOAA)
- U.S. Environmental Protection Agency (EPA)
- U.S. Global Change Research Program (USGRP)

The barriers to recovery in this region are attributed to the cumulative impacts of multiple major hurricanes and flood disasters that have affected the state over the past several years. Many housing units remain uninhabitable, and communities are struggling to overcome the damage from not only the recent impacts of Hurricane Francine, but also from previous storms.

Louisiana residents are facing both permanent and temporary housing shortages, blighted neighborhoods, soaring repair costs, and widespread disaster fatigue as subsequent disasters have led to further destruction across the state.

Population and Housing Demographics of the MID

Approximately 56 percent of the state's population resides within the 22 declared parishes affected by Hurricane Francine. Of this population:

- 37% live in the nine Most Impacted and Distressed (MID) Parishes.
- The nine MID parishes have a slightly lower proportion of low- and moderate-income (LMI) people compared to the state average, with 40% of the population classified as LMI, compared to 43% statewide.
- Poverty levels are also lower in the MID parishes, where 15% of the population lives below the poverty line, compared to 20% statewide.

Housing demographics also highlight conditions within the MID areas relative to the state:.

- The nine MID parishes have a higher proportion of homeowners compared to renters. 79% of the housing units in the MID area are owner-occupied, which is 11 percentage points higher than the state average of 67%. Median home values in the MID areas are wide ranging. Ascension Parish and St. Charles Parish have two of the highest median home values in Louisiana, at \$265,000 and \$257,000, respectively, compared to a State-wide median of \$208,000. The other MID parishes have median home values ranging from \$128,000 in St. Mary Parish to \$198,000 in St. James Parish.
- The MID areas have a significantly higher percentage of individuals at risk of or experiencing homelessness compared to the state average. While the statewide estimate is 3,469 individuals, representing 0.07



percent of the population, the MID areas have 2,678 homeless individuals, which is 0.29 percent of its population. This indicates that the MID areas have a much higher concentration of homelessness relative to its population size compared to the overall state.

Disaster Impacts of the MID

FEMA IA and SBA data indicate that the majority of housing need is borne by homeowners, who are collectively experiencing \$105 million in verified real and personal property losses. This represents 96 percent of the total verified real and personal property losses for owner-occupied homes in the MID areas. While this does not account for the overall need of owner-occupied homes after receiving other sources of assistance through SBA and insurance, it does illustrate the disproportionate impact on homeowners, compared to tenant-occupied households. According to the state's own analysis, which takes into account average actual recovery costs under the Hurricane Ida Restore Louisiana Homeowner Assistance Program (RLHP), the estimated need for recovery increases to \$435 million.

The number of homes impacted in Terrebonne Parish exceeded all other parishes. Terrebonne Parish sustained 25 percent of all properties damaged, 26 percent of all major-severe damaged properties, and over half of all destroyed properties resulting from Hurricane Francine. Flood damage was greatest in Jefferson Parish, with 36 percent of all flooded properties. Of all parishes, Jefferson sustained the highest cost of damage across homes impacted by the disaster.

Impacts of Insurance (HOI and NFIP)

In conducting this analysis, the state uses FEMA Individual Assistance data which includes losses verified by FEMA and insurance status reported by households. The state distinguishes owner-occupied households with evidence of flooding damage and those with no evidence of flooding damage; in the absence of evidence of flood damage, units are assumed to be impacted exclusively by wind. As such, for owner-occupied homes that sustained wind damage, 83 percent lacked a standard homeowner insurance policy to cover losses. For those that sustained flood damage, 68 percent reported lacking a flood insurance policy that would otherwise be expected to offset documented losses.



Damage Type	Owner-Occupied Homes with Real Property Damage	W/O Hazard Insurance*	Percent W/O Insurance
Wind Damage Only	7,594	6,304	83%
Flood Damage	1,556	1,064	68%
Total	9,150	7,368	81%

Table 6: Homeowners without Insurance Damage by Damage Type

*Insurance respective to type of damage

Source: FEMA IA

As outlined in the proposed use of funds overview, the state has prioritized owner-occupied housing repair and household assistance programs that will assist in meeting the short- and long-term recovery needs of residents and communities and increase resilience to disasters. These allocations are based on data collected in the unmet needs assessment, estimates of recovery costs based on actual costs to rehabilitate homes impacted by previous disasters, and input from impacted communities, and are subject to change if new unmet needs information highlights additional needs. Funding allocated for planning will be available to fund studies, analyses, and additional planning efforts that may result in the establishment of additional recovery and resilience priorities and activities or support the design and implementation of the currently described CDBG-DR programs. Beyond housing and planning, the state is aware of the needs for infrastructure, economic revitalization, and hazard risk reduction, and hopes to support these needs with additional funding through federal sources, if awarded.

Housing Unmet Needs

Hurricane Francine exacerbated the lingering impacts of the 2020-2021 disasters, hindering ongoing recovery efforts, and creating new direct consequences for the state. These events left an indelible mark on Louisiana and have exposed new challenges to the state's approach to risk reduction for all residents.

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

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



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

This difficulty is compounded when attempting to assemble future projections of risks because the state does not have the ability to accurately estimate the cost of long-term and repeated flood damage. As a result, wind and flood-related damages have largely been underestimated. The following is the result of two analyses of recovery costs to homeowners: one utilizing HUD's standard method and an alternative method which applies actual average cost to recover to homes sustaining at least \$3,000 in damages.

Rental and Owner-Occupied Housing Unmet Needs

To estimate unmet needs of homeowners and renters, the State compiled information to document damages across several different population stratifications, including owner-occupied and renter households, households with flood damage without flood insurance, households with wind damage without hazard insurance, households within the nine most impacted and distressed areas, and low-and moderate income (LMI) households. For the purposes of this analysis, the State used full applicant-level data collected through FEMA's IA program and SBA's Homeowners, as well as actual recovery costs of homes assisted through the State's existing Restore homeowner program.

Summary of Hurricane Francine Impacts:

- 28,702 homeowners
 - 1,945 major-severe/26,756 minor
- 20,165 renters
 - 405 major-severe/19,760 minor
- Parish with the majority of housing unit damages: Terrebonne
- Total number of individuals displaced to shelters: 70
- Wind-only impacted homeowners without insurance: 83 percent
- Flood impacted homeowners without insurance: 68 percent

The state replicated HUD's analysis of homeowner need by applying the FEMA-SBA multiplier to the FEMAverified loss of each home with estimated damages over \$8,000. This resulted in a standard homeowner unmet need of approximately \$91 million. However, as noted above, this method underestimates actual recovery needs. To better estimate actual recovery costs, the State applied the average cost to recover of all homes with over \$3,000 in FEMA verified losses as a result of Hurricane Ida using actual cost data from the state's existing Restore program. The state found that there were 6,000 homes sustaining damages between \$3,000 and \$7,999



that are excluded from HUD's methodology, but which had actual recovery expenses averaging \$70,000. That average cost of all homes assisted through the program – \$77,000 – accounts for other forms of assistance through FEMA and SBA programs – and is then applied to all owner-occupied homes with over \$3,000 in verified losses (**5,643**) and amounts to approximately **\$435 million in need**.

Renter Households

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

To calculate the standard level of damage for rental households, the following categories apply:

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

Similar to the homeowner analysis, to better understand true recovery needs, the state applied an actual average cost to recover of renter households in the existing Restore program of \$85,000 to all renters sustaining over \$3,000 in damages, 405 renter households. The total calculated through this alternative method is **\$34 million in need.**



Table 7: Disaster: Hurricane Francine DR-4817-LA

Description	Number
FEMA IA Data Date	1/21/2025
Total FEMA Applications	48,941
Owners	28,215
Major/Severe Damage	1,946
Minor Damage	10,850
Renters	19,515
Major/Severe Damage	80
Minor Damage	3,223

Table 8: Comparison of Standard and Alternative Unmet Housing Needs

Need:	Standard Unmet Needs Calculation	State Unmet Needs Calculation using Restore Average Costs	
Total Homeowner Need:	\$91,129,860	\$434,511,000	
Total Renter Need:	\$4,180,054	\$34,425,000	
Total Unmet Housing Need	\$95,309,914	\$468,936,000	

Source: FEMA IA Data, Restore Louisiana Homeowner Assistance Program Data

Table 9: Homeowner versus Rental FEMA Verified Losses

VRP and PP Loss	Amount
Homeowner-Home	\$44,414,336
Homeowner-MH	\$60,556,658
Renter — Home	\$2,658,176
Renter – MH	\$1,521,878
Total Verified Loss (RP/PP)	\$109,151,048



Emergency Shelters, Interim, and Permanent Housing

A qualifying population requiring housing assistance to prevent homelessness is Louisiana's low-income individuals and families affected by natural disasters. The most vulnerable in Louisiana are often those most negatively impacted by lost or damaged housing. Households at risk of homelessness and people experiencing homelessness are not only directly impacted by natural disasters, but they are also indirectly impacted. The indirect impact is felt when the rental market tightens after a natural disaster due to the number of homeowners and renters displaced and searching for new replacement housing. Landlords begin charging higher rents due to increased demand making it even more difficult for those with rental assistance or little to no income to afford. These displaced households also begin to access services that are traditionally provided for people experiencing homelessness, pushing those experiencing homelessness before the disaster out of the system all together.

A March 17, 2022, Housing Impact Assessment (DR-4611-LA) by the Housing Recovery Support Function provided an analysis of the effects of the multiple storms that have affected Louisiana in recent years. These storms have greatly affected both the availability of affordable rental housing and shelters for people experiencing homelessness. According to the report, the main challenge for the State to face is insufficient housing units, made worse by homeless shelters offline due to storm repairs. As a result of storms in 2020 and 2021, Louisiana had an 18% decrease in the number of beds for people experiencing homelessness (*2021 Annual Homeless Assessment Report to Congress*).

Impact on Homeless Populations

The impact of natural disasters on the housed population and on people experiencing sheltered homelessness is very different from the impact on people experiencing unsheltered homelessness.

When a natural disaster damages a housing unit, its inhabitant can hypothetically be made whole by insurance or FEMA. When a natural disaster damages a shelter or broader infrastructure, beds often are rendered uninhabitable. However, eventually those beds are regained via repair and recovery operations.

For Louisianians experiencing unsheltered homelessness (e.g. living on the streets), however, the impact is more difficult to see. A natural disaster cannot remove housing or shelter from a person who does not have housing or shelter. Rather, it removes future housing possibilities. One of the main barriers to permanent housing is a lack of affordable housing. Disasters create a housing affordability and availability crisis which prevents people experiencing homelessness from achieving and stabilizing permanent housing.



The annual Point-in-Time (PIT) Count is a required annual census of sheltered and unsheltered homeless persons on a single night conducted by Continuums of Care (CoC) across the United States. (https://files.hudexchange.info/reports/published/CoC_PopSub_State_LA_2024.pdf). Louisiana has seven Continuums of Care, which are regional planning bodies that coordinate housing and services for people experiencing homelessness. Hurricane Francine impacted parishes in the areas are in the Louisiana Balance of State CoC, the Lafayette/Acadiana Regional CoC and the New Orleans/Jefferson Parish CoC shown below.



Important Notes About This Data: This report is based on information provided to HUD by Continuums of Care (CoCs) in the fiscal year 2019 application for CoC Homeless Assistance Programs. HUD has conducted a limited data quality review but has not independently verified all of the information submitted by each CoC. The reader is therefore cautioned that since compliance with these standards may vary, the reliability and consistency of the Housing Inventory and Homeless Count data may also vary among CoCs. Additionally, a shift in the methodology a CoC uses to count the homeless may cause a change in homeless counts between reporting periods. For inquiries about data reported by a specific Continuum of Care, please contact that jurisdiction directly. CoC contact information can be found on the HUD Exchange website (https://www.hudexchange.info/grantees/contacts/).

CoC Number: LA-509

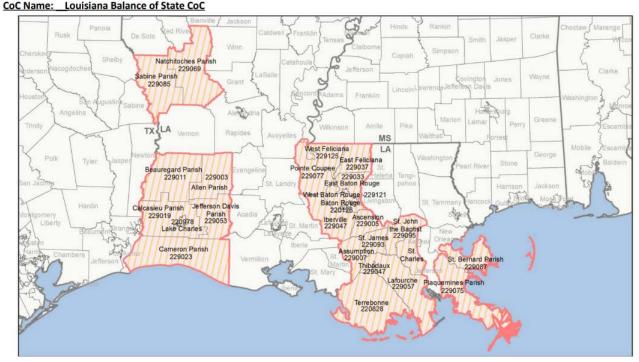


Figure 3: Louisiana Balance of State CoC (LA-509) – Parishes in red-hatched areas participate in Homeless Assistance Programs.





Important Notes About This Data: This report is based on information provided to HUD by Continuums of Care (CoCs) in the fiscal year 2019 application for CoC Homeless Assistance Programs. HUD has conducted a limited data quality review but has not independently verified all of the information submitted by each CoC. The reader is therefore cautioned that since compliance with these standards may vary; the reliability and consistency of the Housing Inventory and Homeless Count data may also vary among CoCs. Additionally: a shift in the methodology a CoC uses to count the homeless may cause a change in homeless counts between reporting periods. For inquiries about data reported by a specific Continuum of Care, please contact that jurisdiction directly. CoC contact information can be found on the HUD Exchange website (https://www.hudexchange.info/grantees/contacts/).

CoC Number: LA-500

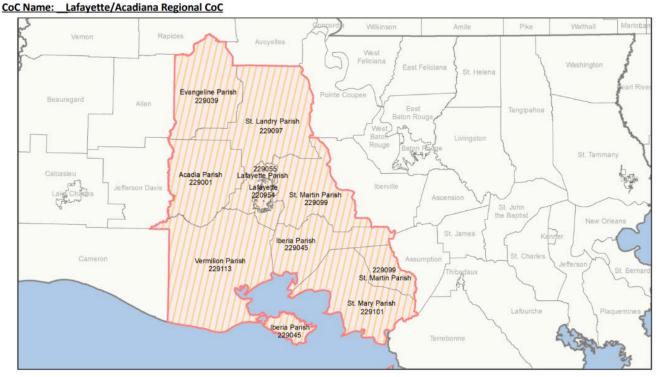


Figure 4: Lafayette/Acadiana CoC (LA-500) – Parishes participating in Homeless Assistance Programs.





Important Notes About This Data: This report is based on information provided to HUD by Continuums of Care (CoCs) in the fiscal year 2023 application for CoC Homeless Assistance Programs. HUD has conducted a limited data quality review but has not independently verified all of the information submitted by each CoC. The reader is therefore cautioned that since compliance with these standards may vary, the reliability and consistency of the Housing Inventory and Homeless Count data may also vary among CoCs. Additionally, a shift in the methodology a CoC uses to count the homeless may cause a change in homeless counts between reporting periods. For inquiries about data reported by a specific Continuum of Care, please contact that jurisdiction directly. CoC contact information can be found on the HUD Exchange website (https://www.hudexchange.info/grantees/contacts/).

CoC Number: LA-503

CoC Name: New Orleans/Jefferson Parish CoC

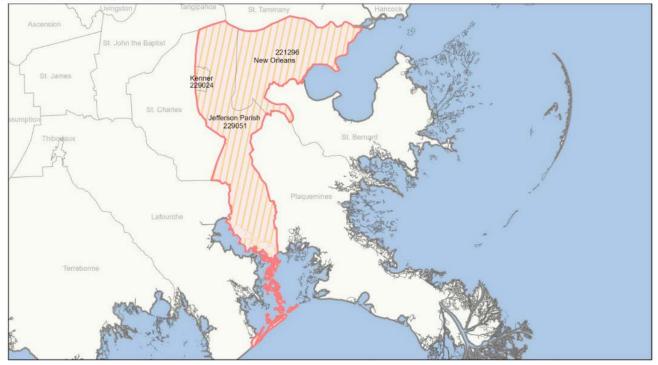


Figure 5: New Orleans/Jefferson Parish CoC (LA-503) – Areas participating in Homeless Assistance Programs

Continuums of Care Containing HUD MID Parishes	Impacted Parish	2024	2023	2022	2021	2020
Lafayette/Acadiana Regional CoC	St. Mary	441	452	351	349	417
Louisiana Balance of State CoC	Ascension, Assumption, Lafourche, St. Charles, St. James, St. John the Baptist, Terrebonne	783	678	4,731	330	1,314
New Orleans/Jefferson Parish CoC	Jefferson	1,454	1,390	1,214	1,042	1,314

Table 10: Point in Time (PIT) Count Data—Homelessness in Impacted Parishes



*In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The unsheltered and total homeless counts reported here may be missing data. Source: 2007-2024-PIT-Counts-by-CoC.xlsb

Table 11: Statewide Sheltered/Unsheltered Data (Known)

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	1890	458	1,563	3,911

Source: Louisiana Housing Corporation

These homeless numbers provide a glimpse into the housing instability caused by recent disasters and the challenge of capturing the full picture of that instability with data alone. The point in time count is only a snapshot of the number of people experiencing homelessness on a single night in January and is comprised of tallies by representatives of the local Continuum(s) of Care. Hurricane Francine caused widespread destruction of homes and displacement of residents, however recent PIT counts within the impacted areas do not point to a dramatic rise in those experiencing homelessness, as they did following previous disasters. These data may suggest residents whose homes were impacted were able to find alternative housing, at least in the short-term following the September 2024 disaster. The State will continue to monitor this data to assess the needs of those without stable housing.



Public Housing (Including HUD-assisted Housing) and Other Affordable Housing Impacted by the Disaster

Table 12: Public Housing (Including HUD-assisted Housing) and Other Affordable Housing Impactedby the Disaster

Parish	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
Ascension	105	0	324	0		105
Assumption	111	0	32	0		111
Jefferson	4,911	0	2,118	0		4,911
Lafourche	275	0	413	0	276	551
St. Charles	129	0	72	0	377	506
St. James	17	0	257	0	252	252
St. John the Baptist	102	0	75	0		102
St. Mary	204	0	114	0		204
Terrebonne	528	0	517	0		528
Total	6,365	0	0	0	905	7,270

Source: Louisiana Housing Corporation

The disaster directly impacted several public housing developments in three of the most impacted parishes – Lafourche, St. Charles, and St. James. Housing Choice Voucher and LIHTC units in all nine of the MID parishes were impacted, including nearly five thousand HCV households and over two thousand LIHTC units in Jefferson Parish, alone. In total, 7,270 public assisted housing units were impacted by the disaster.



Infrastructure Unmet Needs

Since 2000, there have been 35 major disaster declarations in the state of Louisiana since.. The most common natural disasters that result in federal disaster declarations are hurricanes and flooding. Rebounding from extensive infrastructure damage caused by previous disasters while building back with future risks in mind is an ongoing process. This is especially true following previous disasters Hurricanes Laura, Delta, and Zeta, and now Hurricane Francine. Many of the same parishes impacted by the 2020-2021 disasters, specifically Hurricane Ida, have now suffered another setback due to Hurricane Francine. This storm exacerbated the lingering impacts of the 2020-2021 disasters, slowed recovery, and created new direct impacts. The historical pattern of extreme weather events has continued and is expected to become more severe, which is why the state will incorporate risk-reduction measures within its recovery programs to address the region's most prevalent hazards.

Both pre-disaster and in the current state, many existing critical facilities serving Louisiana residents face significant flood risk, thereby inhibiting emergency management procedures and delaying service continuity following a disaster event. The urgent need for significant infrastructure improvements is evident from both past disasters and present conditions. Louisiana's most recent American Society of Civil Engineers' Report Card indicated a D+ grade across 11 key infrastructure sectors, suggesting that without significant improvements, the system will remain vulnerable, leading to exacerbated damages to residents, businesses, and communities in future disasters.

When assessing unmet need, it is important to consider the additional strain on local entities and organizations, as they must reallocate already limited resources to address immediate recovery demands while simultaneously safeguarding their infrastructure assets against future disasters.

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

The region impacted by this disaster had still been in the process of recovering from previous disasters. The 2020-2021 disasters had a cumulative FEMA Public Assistance (PA) local match burden of \$632 million. Due to the amount of supplemental disaster funding actually awarded to Louisiana, the State was only able to reimburse \$247 million of the required state and local match. Thus, the unmet need from the 2020-2021 disasters for PA match alone is over \$385 million. The Hurricane Francine required state and local match will add to this burden from prior year storms.



FEMA Public Assistance

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

HUD's allocation formula is based on FEMA PA estimates of non-federal cost share – 25 percent of eligible costs, excluding costs for debris cleanup and emergency measures – and the state replicated that analysis with the most recent data from FEMA, as of January 14, 2025. This data does not represent the full scope of need for public facilities and infrastructure and will be updated as the State receives additional information about recovery needs.

At this time, the estimate for public infrastructure damages due to Hurricane Francine total over \$45 million with the non-federal share at \$29 million in PA need.

PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non- Federal Share
A - Debris	63	\$4,629,511	\$3,472,133	\$1,157,378
B - Emergency Measures	237	\$38,323,087	\$28,742,316	\$9,580,771
C - Roads and Bridges	5	\$805,000	\$603,750	\$201,250
D - Water Control Facilities	20	\$14,018,689	\$10,514,017	\$3,504,672
E - Building and Equipment	212	\$38,555,538	\$28,916,653	\$9,638,884
F - Utilities	23	\$19,448,737	\$14,586,553	\$4,862,184
G - Other	26	\$595,744	\$446,808	\$148,936
All Categories	586	\$116,376,307	\$87,282,231	\$29,094,076

Table 13: FEMA Public Assistance Program

Source: GOHSEP



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. HMGP is generally calculated at 15 percent of the total amount of IA and PA allocated to a disaster event, up to the first \$2 billion. With assistance in excess of \$2 billion, the amount of HMGP funds made available decreases to 10 percent and then 7.5 percent on a sliding scale. The state's required local match obligation for Hurricane Francine has been calculated to be 25 percent of eligible project costs. **Therefore, the state's unmet need, or HMGP non-federal share estimate, is \$7.5 million**.

Table 14: Hazard Mitigation Needs at State-level

Project	Cost	Funding Source	Unmet Need (25% local match)	
Statewide	\$29,833,137.33	FEMA	\$7,458,284.33	
Total	\$29,833,137.33		\$7,458,284.33	

Source: GOHSEP

Morganza to the Gulf Hurricane Protection System (MTG)

Funds are also needed for a major levee construction project that is anticipated to significantly reduce flood risk and is currently under construction. Hurricane Francine impacted the Morganza to the Gulf Hurricane Protection System (MTG) causing system-wide damages of varying degrees and affecting levee integrity. Additionally, it is necessary that the state completes the last remaining large gaps of protection in the interim MTG system in order to reduce the risk of future flooding in the region. There is an additional need of approximately **\$641.6 million for the following infrastructure needed to protect the parish and its citizens from future storms. These are not anticipated as CDBG-DR expenses, and are, thus, not included in the overall unmet needs in Table 5.**

Needs for New Work to Complete Critical Gaps in the MTG Interim System

1. Construction of the Reach A Levee Segments: \$51,600.000

Hurricane Francine's original projected storm path was along a potential critical route near an existing gap in the MTG system. Had the hurricane maintained its original track, it would have exposed the MTG system's remaining critical vulnerabilities.



The U.S. Army Corps of Engineers (USACE) is currently constructing one of these critical segments, while the CPRA and the Local Levee District are seeking funding to close the remaining gaps. Therefore, funds are needed to address this critical gap as soon as possible.

Total funding needed for these additional interim segments is as follows:

- Reach A Segment 1: \$2,000,000
- Reach A Segment 5: \$9,000,000
- Reach A Segment 4: \$35,000,000
- Reach A Segment 1 Mitigation: \$750,000
- Reach A Segment 5 Mitigation: \$1,320,000
- Reach A Segment 4 Mitigation: \$3,530,000

2. Construction of Major Floodgates (1 percent AEP) in the MTG System - Gulf Intercoastal Waterway (GIWW) Floodgate East and West: \$590,000,000

The USACE is currently engineering and designing the two critical flood/navigation gates, GIWW East and West, for the MTG System. The state needs to secure funding to fully construct both of these critical components of this system in a timely manner to avoid the potential for repeated flood disasters.

Economic Revitalization

Statewide Economic Damage & Loss Assessment

As the Louisiana economy continued to recover and rebuild from previous disasters, including Hurricane Ida in 2019, the COVID shutdowns of 2020, and 2020 Hurricanes Laura and Delta, Hurricane Francine in 2024 caused FEMA-declared damage to 22 out of 64 parishes. Of those, seven were declared most impacted and distressed (MID) areas by HUD, and an additional two parishes will be identified as MID by the State.

Following Hurricane Francine, the Louisiana Department of Economic Development (LED) partnered with a private economic consulting group to assess economic damages resulting from the disaster event, publishing "The Economic Impact of Hurricane Francine of the State of Louisiana" on October 24, 2024 (Louisiana Economic Development, 2024).² The LED study estimates the total economic impact of Hurricane Francine at \$2.1 billion. Key findings from these assessments follow.

² Louisiana Economic Development, The Economic Impact of Hurricane Francine of the State of Louisiana, October 24, 2024



- The peak business disruption includes just over 60,000 business operations impacted across Louisiana almost 44 percent of all Louisiana businesses.
- Hurricane Francine impacted just under 700,000 employees at the peak, or 40 percent of the Louisiana workforce.
- LED estimates a \$163 million loss in labor productivity through September 18, 2024.
- Louisiana had \$828 million of lost output quantified by value added through September 18, 2024.
- Estimates of structural damage to businesses are \$387 million while equipment loss estimates are \$99 million.
- The LSU AgCenter estimates total agricultural losses of \$55.3 million, including soybeans, rice, sugar cane, sweet potatoes, cotton, and agricultural infrastructure.³

Table 15: Summary of Damages by Category

Category of Damages	Losses (In \$Millions)		
Agriculture*	\$55.3		
Business Structures	\$387.4		
Business Equipment	\$98.8		
Business Interruption Loss	\$827.8		
Total*	\$1,369.3		

*Updated agriculture losses with LSU AgCenter Study data published November 20, 2024.

These are not anticipated as CDBG-DR expenses, and are, thus, not included in the overall unmet needs in Table 5.

Business Interruption Losses

The largest component of economic damage due to Hurricane Francine was business interruption loss, , which accounted for \$828 million in losses, according to the LED study. To characterize these losses, LED estimated the number of Louisiana businesses that closed and the number of employees unable to work each day from

³ LSU AgCenter, Estimates of the Economic Impacts on the Louisiana Agricultural Industry from Hurricane Francine, November 20, 2024



September 10 to September 18 due to Hurricane Francine. Additionally, LED assessed lost worker productivity, measured by wages and lost output (measured by value added), for each day during that period.

A combination of factors including evacuation orders, school closures, local conditions such as wind speed and flooding, property damage estimates, and electric power outage data was used to generate parish-level estimates of the proportion of businesses closed at the two-digit NAICS code level. The LED study also details the wind model and flood estimation methodology used.

Hurricane Francine was first designated as potential Tropical Cyclone Six on September 8, 2024, and strengthened into a Tropical Storm on September 9, 2024. It was forecasted to become a hurricane before landfall. Evacuation orders extended from Cameron Parish to Plaquemines Parish. Mandatory evacuation orders were issued for west and south Terrebonne Parish, those south of Leon Theriot locks in Lafourche Parish, areas outside levee protection in Plaquemines Parish, as well as Grand Isle and Lafitte residents of Jefferson Parish. Voluntary evacuation orders were issued in Assumption, Iberia, Jefferson Davis, St. Tammany, Lafayette, St. Martin, St. Mary, and Tangipahoa Parishes. Schools in 28 parishes were closed at some point between September 10 and September 13 due to Hurricane Francine, with most closures occurring Wednesday and Thursday, September 11-12.

In the parishes with the largest number of businesses and employees, the persistence of power outages varied. At the peak, over 60,000 Louisiana businesses were closed due to Hurricane Francine. This translates into almost 44 percent of all Louisiana businesses. Compared to prior stronger storms, the recovery from Hurricane Francine occurred quite quickly. By Thursday, September 12, the portion of Louisiana businesses closed dropped to 13 percent, and less than 5 percent of Louisiana's businesses were impacted as of Friday, September 13. The largest peak business disruptions were in East Baton Rouge, Orleans, and Jefferson Parishes.

Property Losses

Finally, the LED study provided an economic estimate of damages to business structures and equipment attributable to the hurricane. Hurricane Francine damaged Louisiana business structures, equipment, and residences in two ways. First, the hurricane subjected Louisiana's coastline as well as inland parishes to sustained heavy winds. Second, it created flooding in numerous Louisiana parishes. In places like Kenner, sheet flooding occurred when rain fell too quickly for drainage systems to keep up. Thus, LED estimated two models, one to capture wind speed from the Hurricane and a second that focuses on flooding.

LED computed a weighted wind speed for each parish that was used to estimate the average wind a typical business within the parish faced. Then, engineering models were used to estimate the probability of damage and an expected damage ratio by industry type. Models were calibrated based on damage assessments



throughout the affected area and hundreds of photos taken from the affected region. The final step consisted of applying the wind damage ratio to parish level data on the aggregate value of businesses within each two-digit NAICS (industry) code. A similar approach was used to assess damage due to flooding.

Overall, the model estimates \$387.4 million in damage to business structures. The largest impacts occurred in Terrebonne and Jefferson Parishes with over \$90 million in damages each, and in Orleans Parish with \$74 million in damages. The model additionally estimates \$98.8 million in damage to business equipment. Terrebonne, Jefferson, and Orleans Parishes again register the largest estimated damages with a combined total of nearly \$63 million in business equipment damages.

Agricultural Losses

The LSU AgCenter published "Estimates of the Economic Impacts on the Louisiana Agricultural Industry from Hurricane Francine" (LSU AgCenter study) on November 20, 2024.³ Based on this study, the economic impacts from Hurricane Francine on Louisiana's agricultural sector are estimated to be \$55.3 million. Approximately 98 percent of this is associated with soybeans and sugarcane. Many soybean fields were abandoned altogether after excessive rainfall significantly delayed harvest and damaged crops. Sugarcane production was reduced by rainfall and high winds, and in some cases, necessitated the replanting of entire sugarcane acres. Other regional crops were also affected, but at lower levels due to the stage of production and quick return to favorable weather conditions post Francine.

According to the LSU AgCenter study, "Impacts from Hurricane Francine come on the heels of an estimated \$1.6 billion in impacts in 2023 from excessive drought and heat and \$495 million in 2022 from excessive rainfall. The accumulative effect of three consecutive years of weather-related impacts coupled with depressed commodity prices leaves many operations within the agricultural industry in very precarious financial situations."



Commodity	Acres Failed	Additional Acres Impacted	Average Yield Losses	Average Quality Damage	Acres Replanted	Total Economic Impact
Rice – Primary Crop	0	1,300	12.50%	12.50%	N/A	\$38,928
Rice – Ratoon Crop	0	50	5.00%	5.00%	N/A	\$717
Soybeans	22,061	56,050	31.56%	17.06%	N/A	\$23,659,951
Cotton	0	5,232	6.25%	6.25%	N/A	\$320,973
Sweet Potatoes	0	100	15.00%	0.00%	N/A	\$124,416
Sugarcane	N/A	224,710	9.11%	0.00%	96	\$30,465,579
Infrastructure Damage	N/A	N/A	N/A	N/A	N/A	\$651,796
Total Economic Impact*						\$55,262,360

Source: LSU AgCenter Study

Small Business Administration's (SBA) Business Economic Injury Disaster Loan Program

To date, one primary form of known assistance approved to address the losses described above is assistance through the Small Business Administration's (SBA) Business Economic Injury Disaster Loan Program. As of January 6, 2025, the following is the status of SBA loan approvals.⁴

- Business loans applied for: 2,259
- Business loans approved to date: 451
- Total approved business loans amount: \$9,601,100

⁴ Small Business Administration (SBA), Louisiana Hurricane Francine Dataset. January 6,2025.



The state estimates business needs by multiplying the median real property and content losses greater than \$30,000 by the number of businesses denied an SBA loan. **This results in an unmet need of \$7,833,053.**

Summary of Economic Needs

Table 17: Economic Unmet Needs - SBA

Type of Loss	Total
Total Unmet Needs	\$7,833,053

* includes labor productivity and value-added losses



Mitigation Needs Assessment

In accordance with HUD guidance, the state of Louisiana completed the following Mitigation Needs Assessment. The state consulted with GOSHEP and the DOTD Floodplain Management Office and reviewed existing hazard mitigation plans, and past Action Plans of the state's earlier CDBG-DR grants recently approved by HUD to develop a multi-hazard risk-based Mitigation Needs Assessment. This assessment informs and provides a substantive basis for mitigation activities proposed in this Action Plan, with a focus on addressing and analyzing all significant current and future hazard risks.

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

There have been 103 major disasters and emergency declarations in the state of Louisiana since 1953⁵. The most common natural disasters that cause damage to an extent that results in a federal disaster declaration are hurricanes and flooding. Since 2000, there have been 36 declared flood and hurricane-related disasters. This historical pattern of extreme weather is expected to continue and become more severe. Based on this, mitigation measures to reduce impacts caused by these types of hazards are critical.

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

Repetitive and severe repetitive flood loss properties are particularly costly, with claims totaling over \$2 billion in Louisiana since 1978⁸. It is important to note that repetitive flood loss properties represent only 1.3 percent of all flood insurance policies but historically account for nearly one-fourth of the claim payments. Mitigating repetitive loss properties in Louisiana and preventing the future accrual of additional repetitive loss properties benefits not only the state of Louisiana but the entire country by contributing to the stability of the NFIP.

⁵ Federal Emergency Management Agency, <u>https://www.fema.gov/disaster/declarations 2025.01.29</u>, January 29, 2025 (This product uses the Federal Emergency Management Agency's API, but is not endorsed by FEMA.)



Cost of Disasters

Between 1980 and 2024, 106 individual disaster events exceeding a billion dollars each in damage affected Louisiana, totaling more than \$300 billion (CPI-adjusted).⁶ This includes 27 tropical cyclones, 10 flooding events, 44 severe storms, 9 winter storms, 15 droughts, and 1 freeze events. Louisiana ranks among the costliest states for weather and disasters compared to other states affected by billion-dollar events (this summation does not include losses less than a billion dollars). An overview of Louisiana's billion-dollar events is provided in the table below.

Disaster Type	Events	Events/ Year	Percent Frequency	Total Costs	Percent of Total Costs
Drought	15	0.3	14.2%	\$5.0B-\$10.0B	2.2%
Flooding	10	0.2	9.4%	\$20.0B-\$50.0B	6.8%
Freeze	1	0	0.9%	\$100M-\$250M	0.1%
Severe Storm	44	1	41.5%	\$10.0B-\$20.0B	4.1%
Tropical Cyclone	27	0.6	25.5%	\$200.0B- \$300.0B	86.0%
Wildfire					
Winter Storm	9	0.2	8.5%	\$2.0B-\$5.0B	0.7%

Table 18: Billion-Dollar Events to Affect Louisiana, 1980-2024 (CPI-Adjusted)

Source: NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2025)

Louisiana is also facing coastal land loss, which poses a risk to businesses, homes, infrastructure, as well as larger economic implications due to the state's importance in shipping, energy production, chemicals, and other sectors. The five most heavily impacted regions in Louisiana are highlighted in the table below. The lost economic assets are heavily concentrated in the coastal regions facing more significant rates of land loss. The business disruption costs are distributed more evenly across the coast.⁷

⁶ NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2025). <u>https://www.ncei.noaa.gov/access/billions/</u>

⁷ LSU, Economics & Policy Research Group. Regional Impacts of Coastal Land Loss and Louisiana's Opportunity for Growth



Area	Infrastructure Replacement Costs	Business Disruptions
United States Total	\$3.6 billion	\$7.6 billion
New Orleans	\$1.7 billion	\$1.7 billion
Baton Rouge	\$60 million	\$600 million
Houma	\$1.4 billion	\$1.4 billion
Lafayette	\$140 million	\$390 million
Lake Charles	\$420 million	\$490 million

Table 19: Costs of Land Loss to Infrastructure and Businesses in Louisiana

The US Total represents the total damages in both Louisiana and the Country from land loss in Louisiana. All figures in 2015 dollars.

National Flood Insurance Program

Flooding is a problem for many people across the United States. Enduring the consequences of repetitive flooding can put a strain on residents and on state and local resources. When the water rises, communities face the disruption of life, damaged belongings, and the high cost of rebuilding. FEMA administers the National Flood Insurance Program, which pays flood claims while also keeping the price of flood insurance at an affordable level. All parishes in the state of Louisiana participate in the NFIP. As of December 2024, there were 433,986 NFIP policies in force across the state.⁸

Repetitive and Severe Repetitive Flood Loss

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

As of December 2024, there are 30,783 repetitive loss properties (a decrease of 2,008 properties from October 2021) and 5,508 severe repetitive loss properties (a decrease of 2,547 from October 2021) in the state of



Louisiana.⁸ When a property has been mitigated, FEMA may remove the repetitive loss designation. This is likely the result of ongoing demolition or mitigation of such properties following disasters and funding allocated to mitigation in repeatedly impacted areas.

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

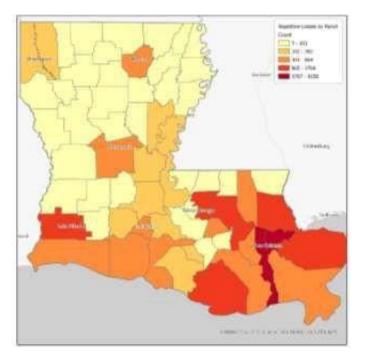


Figure 6: Distribution of RL/SRL structures across the state.

Like repetitive loss properties, the majority of severe repetitive loss properties are in the southern part of the state. The largest concentrations of severe repetitive loss properties in the state occur in the heavily populated

⁸ Federal Emergency Management Agency, <u>https://www.fema.gov/openfema-data-page/nfip-multiple-loss-properties-v1</u>, January 29, 2025 (This product uses the Federal Emergency Management Agency's API, but is not endorsed by FEMA.)



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

With support from the state, the municipalities in Louisiana are working to mitigate their repetitive flood losses. As of 2024, a total of 22 percent of the repetitive loss properties in Louisiana have been mitigated. The parishes with the highest number of mitigated properties are Jefferson and Orleans, followed by Terrebonne, St. Tammany, and St. Bernard.⁸

Cost of Future Risk

To assess future risk, the Louisiana Hazard Mitigation Plan (SHMP)⁹ utilizes a planning time horizon of 25 years (from a 2024/2025 baseline) and calculates potential impacts of natural hazards in the year 2050. Illustrated in the table below, 2050 flood-related losses are the highest projected average in the state at \$3.6 billion. Wind-related losses are ranked as the second-highest projected annual loss, equal to \$1.2 billion should a 1 percent annual exceedance probability flood event (AEP) occur. Expansive soils are identified as the third most costly projected annual loss, equal to \$96 million.

Despite the state's extensive efforts to mitigate flood risks following disasters such as Hurricanes Katrina, Rita, Gustav, Ike, Isaac, and the Great Floods of 2016, as well as through long-term efforts like the Coastal Master Plan, losses attributable to a 1 percent AEP flood event will account for more than one-third of all anticipated disaster losses by 2043. Moreover, given the state's recent history of federally-declared disaster events attributable to a significant flood – many of which were measured to be well in excess of a 1 percent AEP event – this assessment contends the SHMP loss estimate of \$5.1 billion annually by the year 2050 does not overstate the state's long-term flood damage risk.

⁹ Louisiana Governor's Office of Homeland Security, State Hazard Mitigation Plan (SHMP), March 21, 2024. (https://gohsep.la.gov/divisions/hazard-mitigation-assistance/state-hazard-mitigation-plan/)



Table 20: SHMP 2050 Projected Annual Losses

Hazard	Projected Annual Loss
Flood	\$3,632,000,000.00
Wind	\$1,241,000,000.00
Expansive Soil	\$96,000,000.00
Drought	\$54,000,000.00
Tornado	\$30,400,000.00
Wildfire	\$30,000,000.00
Extreme Cold	\$15,000,000.00
Earthquake	\$12,000,000.00
Hail	\$4,200,000.00
Lightning	\$4,005,000.00
Extreme Heat	\$1,000,000.00
Sinkhole	\$1,000,000.00



Table 21: Top 5 Jurisdictions Most Susceptible to Damage/Loss from Each Identified Hazard, with "1"Being the Most Susceptible. MID Parishes are Highlighted

Hazard	1	2	3	4	5
Extreme Heat	St. James	Caldwell	Franklin	East Carroll	Tensas
Drought	Caddo	Vermilion	Avoyelles	St. Landry	Assumption
Wildfire	St. Tammany	Tangipahoa	Livingston	Calcasieu	East Baton Rouge
Extreme Cold	Caddo	St. Tammany	Livingston	Ascension	Lafayette
Wind	Jefferson	Orleans	St. Tammany	Terrebonne	Lafayette
Hail	Jefferson	Calcasieu	St. Tammany	Bossier	Caddo
Lightning	Livingston	Bossier	East Baton Rouge	Lafayette	St. Martin
Tornado	Bossier	Ouachita	Lincoln	Lafayette	Caddo
Flood	St. Tammany	Terrebonne	Lafayette	St. Mary	Jefferson
Sinkhole	St. Mary	St. Martin	Calcasieu	Acadia	Plaquemines
Expansive Soil	Orleans	Jefferson	East Baton Rouge	St. Tammany	Ascension
Earthquake	Ouachita	East Baton Rouge	Caddo	Bossier	St. Tammany
Total Losses	St. Tammany	Terrebonne	Lafayette	Jefferson	St. Mary

Greatest Risk Hazards

The Louisiana GOHSEP Hazard Identification and Risk Assessment (2018 HIRA)¹⁰ ranks local floods as the highest risk to the state based on consideration of consequence, vulnerability, threat, and risk factors. This threat is followed closely by severe thunderstorms, wide-area floods, tornados, and hurricanes. Based on the SHMP and local hazard mitigation plans, both HUD and LA MID areas share a collective greatest risk profile that includes wind and flood hazards, which are compounded by the effects of subsidence and sea-level rise. This section

¹⁰ Louisiana Governor's Office of Homeland Security, Hazard Identification and Risk Assessment (2018 HIRA) https://gohsep.la.gov/media/y4dmobyp/state-of-louisiana-2024-hm-plan_final-sec2.pdf



addresses quantitative and qualitative descriptions of these hazards and their projected current and future risk to MID areas and the State of Louisiana.

Hurricanes/Tropical Cyclones

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

Tropical cyclones produce dangerous conditions due to flooding, high winds, and storm surge. Rainfall can cause ravine flooding and flash floods, creating dangerous conditions for residents and first responders. High wind speeds are typical with tropical cyclones, even resulting in tornadoes, which can damage homes and critical infrastructure (especially the above-ground electrical grid). Storm surge is an increase in water height caused by strong winds, often associated with a hurricane that produces vertical circulation below the water surface and elevates the water height. When a storm approaches land and encounters shallower water, the water piles up to a greater height. Combined with sea-level rise, the impacts of storm surge are felt farther inland, affecting communities that were once protected by surrounding wetlands that have now been lost. Data from 1900 to 2021 depicted in the figure below show that the entire state has been impacted by tropical cyclones, often significantly.



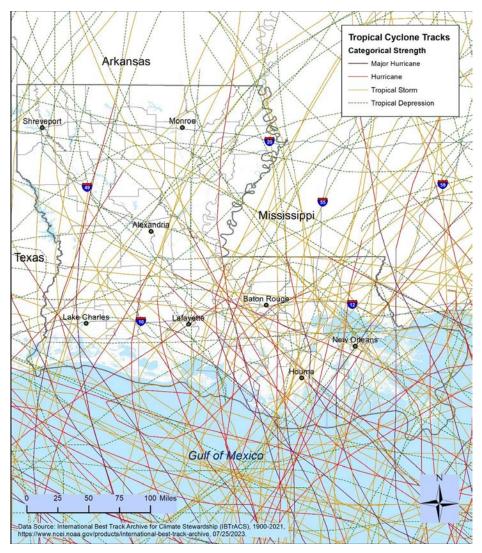


Figure 7: Tropical Cyclone Tracks Across Louisiana (1900-2021). Source: NOAA, Historical Hurricane Tracks, <u>https://coast.noaa.gov/hurricanes/</u>

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

Floods

A flood is the overflow of water onto land that is typically not inundated. Excess precipitation, produced from thunderstorms or hurricanes, is often the major initiating condition for flooding, and Louisiana can have high



rainfall totals at any time of the day or year. The SHMP indicates five specific types of floods that are of main concern: riverine, flash, ponding, backwater, and urban. The 1 percent AEP flood is used as the basis for regulatory standards, such as building codes and flood insurance requirements, and represents the baseline for the SHMP evaluation.

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

While projected changes for riverine flooding are still being developed through the Louisiana Water Initiative's watershed monitoring, mapping, and modeling program, the CPRA modeling predicts increases in coastal flooding illustrated in the figure below which captures a medium environmental scenario with no mitigation action with the current 100-year flood depths¹¹. The figure below provides a more detailed coastal flood risk projection through 2075 if no action is taken. As noted in NCA4 (2017)¹², the projection of the flood hazard to 2050 is a complex multivariate problem, as human activities such as deforestation, urban and floodplain development, construction of dams, flood mitigation measures, and changes in agricultural practices impact future flood statistics.

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

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

¹¹ Coastal Protection and Restoration Authority (CPRA), 2023 Coastal Master Plan. <u>https://coastal.la.gov/our-plan/2023-coastal-master-plan/</u>

¹² U.S. Global Change Research Program, Fourth National Climate Assessment (NCA4), 2017. https://nca2018.globalchange.gov/



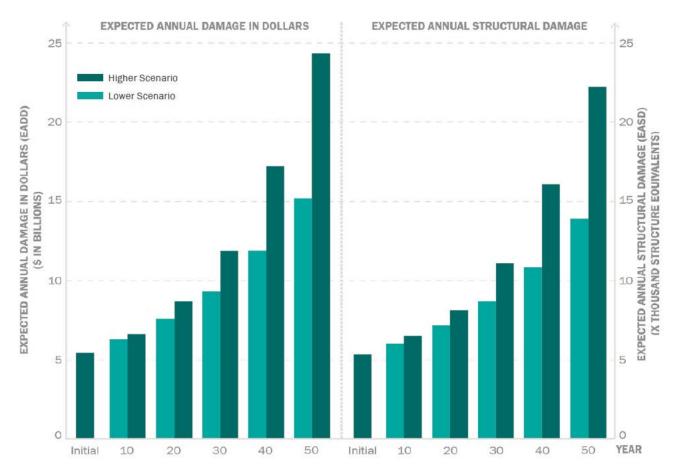


Figure 8: Expected Annual Damage in Dollars (EADD) and Expected Annual Structural Damage (EASD), Over 50 Years, Future Without Action, Higher and Lower Scenario. Source: <u>https://coastal.la.gov/our-plan/2023-coastal-master-plan/</u>

Sea Level Rise

Due to a variety of factors including eustatic sea-level rise, subsidence, and coastal land loss, Louisiana has one of the highest sea-level rise rates in the world.⁹ This steadily increasing threat further exacerbates flood risk within the state, as it multiplies the potential impacts of any isolated flood event and contributes to an ever-worsening baseline state of flood risk exposure.¹⁰

As sea-level rise impacts the coastal areas of Louisiana, it also weakens the existing network of wetlands, barrier islands, and brackish estuaries that provide critical storm protection and flood retention natural functions to more inland portions of the state.



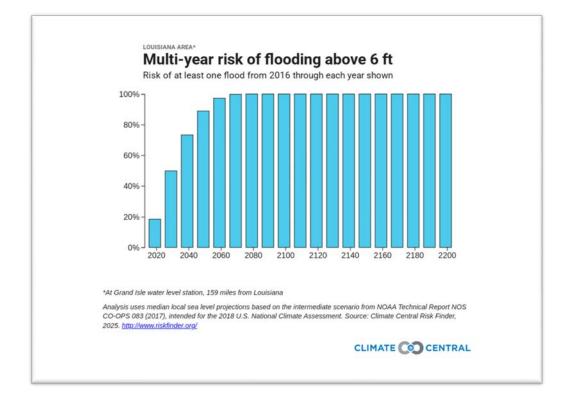


Figure 9: Louisiana multi-year risk of flooding above 6 ft. Climate Central, Surging Seas Risk Finder, January 2025. Source: www.riskfinder.org.



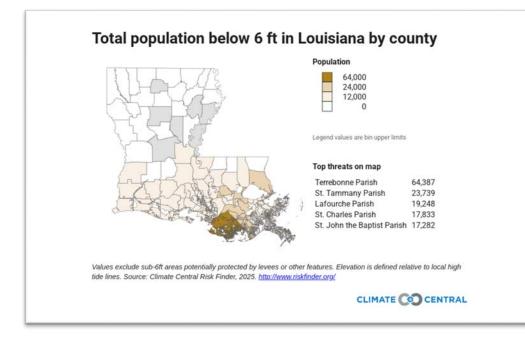


Figure 10: Total population below 6ft. by parish - Climate Central, Surging Seas Risk Finder, January 2025. Source: <u>www.riskfinder.org</u>.

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

Extreme Precipitation

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

Louisiana experiences the second highest rainfall rate in the country with an average of 60.1 inches annually¹³. Statewide annual precipitation has ranged from a low of 36.6 inches in 1924 to a high of 79.5 inches in 1991, but rainfall has been above average since 1970.

¹³ NOAA National Centers for Environmental Information, State Climate Summaries 149-LA, March 2019 Revision. <u>https://southcentralclimate.org/wp-content/uploads/2019/08/LA-screen-hi.pdf</u>



Louisiana is often subject to high water levels in its major riverine systems, due to flooding conditions upstream in the Midwest¹⁴ that can pose an elevated threat when combined with extreme precipitation or wind events. Because of its flat landscape and interconnected waterways, the impact of a rainfall event in one part of the state can be greatly felt far beyond the boundaries of where the rain falls.



Figure 11: Louisiana Average Annual Rainfall Distribution. PRISM Climate Group, <u>www.Prism.oregonstate.edu</u>, January 2025.

Louisiana has experienced a number of historic storms and rainfall events with high damage levels in the past two decades, but these events are not outliers from a historical perspective. In fact, such events may speak to existing trends in rainfall data and flood risk. Since 1958, the amount of precipitation falling during heavy rainstorms has increased by 27 percent in the southeast, and the trend toward increasingly heavy and frequent rainstorms, including a significant increase in extreme precipitation events, is projected to continue with high confidence¹⁵. Moreover, the amount of rainfall in the Midwest is also likely to increase, which could worsen flooding in Louisiana, as most of the Midwest drains into the Mississippi River.

¹⁴ R. Frankson, K. Kunkel, and S. Champion. Louisiana State Climate Summary. NOAA Technical Report NESDIS 149-LA, 4 (2017)

¹⁵ U.S. Environmental Protection Agency, What Climate Change Means for Louisiana, August 2016. https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-la.pdf



Fair Housing and Civil Rights Data Collection

It has been long recognized that storm and flood-related risk often corresponds with a high level of social vulnerability, compounding the impact of flood events with the challenges of poverty for many victims. Louisiana features extensive social vulnerability across the state, as well as extreme exposure to flood, storm, and coastal hazards. Further, many Louisiana residents have experienced multiple flood events, and therefore have been repeatedly subjected to interruptions in work when having to rebuild or relocate. This has long-term negative impacts on household wealth, mental health, and community cohesion.

LOCD-DR will allocate funds primarily to housing programs that account for the eligible needs of the state's most vulnerable populations, understanding that the funding allocated is not sufficient to serve all households in need of assistance.

The following demographic information describes vulnerable populations within the state and impacted areas, including persons with Limited English Proficiency (LEP), those belonging to protected classes or certain vulnerable populations, those living in distressed communities, and tribal communities.

The following tables provide parish-level overviews for each of the identified populations within the affected parishes. The state is committed to using its CDBG-DR funds consistent with its obligation to affirmatively further fair housing for all. As such, the state plans to take measures to make accessible its housing assistance programs to those populations that historically face impediments to housing opportunities.

The state's housing programs are designed to address the needs of individuals and households affected by the hurricanes, with the great majority focused on LMI households and protected classes that have historically faced challenges. We anticipate all protected classes will be served through the housing programs funded through this grant. In cases where certain protected or vulnerable groups are underrepresented, the state will work with local leaders, community institutions, communication specialists, legal counselors, and community liaisons to conduct outreach and publicize program opportunities. This effort is in line with the state's longstanding work to ensure fair housing opportunities for marginalized groups through previous disaster recovery housing programs.



Populations with Limited English Proficient (LEP)

Table 22: 2025 ACS 5-year estimates of Limited English Proficient

Locality	Estimated of Population Speak English "Very Well"	Estimated Percent of Population Speak English Less Than "Very Well"
Ascension	4,369	3.6%
Assumption	424	2.2%
Jefferson	38,118	9.4%
Lafourche	2,030	2.2%
St. John the Baptist	1,037	2.7%
St. Mary	2,115	4.7%
Terrebonne	2,132	2.1%
St. James	88	0.5%
St. Charles	1530	3.1%

Jefferson Parish has the largest population of limited English speakers of all the MID parishes. Its largest incorporated city is Kenner which has the largest population of persons speaking English less than "very well." Jefferson Parish is in the Greater New Orleans Area.



Table 23: Limited English Proficient

Language	Louisiana	Ascension	Assumption	Jefferson	Lafourche	St. John the Baptist	St. Mary	Terrebonne	St. James	St. Charles
Total	114,713	2,704	330	8,637	1,458	422	861	2,012	18,667	810
English Only	94%	94%	54%	92%	80%	88%	94%	84%	98%	99%
Spanish	2%	3%	6%	4%	2%	7%	2%	5%	1%	1%
Other Indo-European Languages	4%	3%	41%	3%	18%	5%	2%	11%	1%	0%
Asian and Pacific Island Languages	3%	0%	0%	0%	16%	0%	2%	0%	0%	0%
Other languages	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Total	114,713	2,704	330	8,637	1,458	422	861	2,012	18667	810

Source: Limited English Proficient - Census Bureau Tables

Persons belonging to protected classes

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

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



While the program areas included in this Action Plan do not define eligibility based on protected class status, the state – through its history of disaster-recovery work – has documented correlations between adverse impacts, household income levels, and certain protected classes. Therefore, in prioritizing both disaster risk mitigation and benefit to low-and moderate-income households, the state reasonably anticipates that program areas outlined in this Action Plan will have a significant positive impact on protected class populations and will design programs to ensure the housing opportunities offered through this program are accessible to populations that historically face impediments to housing.



Table 24: 2025 ACS 5-year estimates

Demographics	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Estimate	MID Percentage
Black or African American (Non- Hispanic)	1,464,023	31.8%	629,890	24.8%	240,557	25.9%
Native American (Non-Hispanic)	31,657	0.7%	22,669	0.9%	12,318	1.3%
Hispanic or Latino	322,549	7%	192,299	7.5%	77,042	8.3%
Asian/ Pacific Islander (Non- Hispanic)	88,349	1.9%	60,344	2.3%	21,694	2.3%
Some Other Race (Non-Hispanic)	142,699	3.1%	5,718	0.2%	1,457	0.7%
Two or More Races/Multiracial (Non-Hispanic)	273,377	5.9%	42,540	1.7%	12,555	1.4%
Foreign-born population excluding population born at sea	222,672	2%	254,167	10%	172,454	18.8%
LEP	69,507	50.2%	155	0.01%	90	0.01%
Veterans	203,031	5.8%	109,154	4.3%	40,180	4.3%
Persons living in poverty	868,972	18.9%	452,056	17.8%	151,169	16.3%

Source: 2020 HUD AFFHT0006

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



low concentration of homeowners responds to completing the survey, the Program has and can-do door-todoor outreach to canvas these neighborhoods.

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

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

Further, the State complies with the environmental requirements of 24 CFR Part 58. This environmental review process provides a mechanism to identify environmental conditions impacting the use of property for consideration of means to mitigate adverse impacts or provide alternate assistance in the recovery process. At a minimum every project site is inspected and evaluated for potentially hazardous materials and contamination, giving specific attention to any proposed site on or in the general proximity of such areas as industrial corridors, waterways, EPA superfund sites, brownfields, leaking underground storage tanks, etc. In addition, the proximity to hazardous facilities which store, handle or process hazardous substances of a flammable or explosive nature is evaluated as part of the decision-making and mitigation processes and its environmental justice impacts.

The state's top priority at this time is for safe, decent, and affordable housing for vulnerable populations, protected classes, and underserved communities. For the owner-occupied housing programs, low-and moderate-income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. The State of Louisiana intends to promote high quality, durable, and energy efficient construction methods. All rehabilitation, reconstruction, or new construction will meet an industry-recognized standard that has achieved certification under at least one of the Green Building Standards. In addition, 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.

Furthermore, the Louisiana Watershed Initiative serves as the state's multi-pronged approach to mitigate future flood risk and expand resilient development patterns while focusing on natural boundaries. The eight watershed districts have created regional steering committees, representative of the demographics, parishes, and local jurisdictions within each watershed, including members of protected classes, vulnerable populations, and underserved communities, at all levels of decision making.



Persons belonging to protected classes by housing tenure

In the state of Louisiana, a significant disparity in homeownership exists among different racial and ethnic groups. Out of homeowners, 71 percent are Non-Hispanic White (Non-Hispanic), while only 23 percent are Black or African American (Non-Hispanic). Hispanic or Latino homeowners make up 4.7 percent, and Asian/Pacific Islander (Non-Hispanic) homeowners account for 1.6 percent. Native American (Non-Hispanic) homeowners are just 0.7 percent, and those identifying as two or more races/multiracial (non-Hispanic) are 6 percent.

On the rental side, 41 percent of renters are White (Non-Hispanic), whereas 47 percent are Black or African American (Non-Hispanic). Hispanic or Latino renters constitute 7.8 percent, and Asian/Pacific Islander (Non-Hispanic) renters are 2.1 percent. Native American (Non-Hispanic) renters are 0.8%, with two or more races/multiracial (non-Hispanic) renters at 6.8 percent, and some other race (non-Hispanic) renters at 2.7 percent. This data highlights the significant socio-economic disparities in housing tenure among different racial and ethnic groups across Louisiana. In accordance with these data, the state will ensure that programs are designed to optimize participation in its housing programs of underrepresented racial and ethnic groups.



Table 25: Housing tenure by race and ethnicity

Housing Tenure	Areawide Estimate	Areawide Percentage
Areawide Total Homeowners	1,200,407	67%
White (Non-Hispanic) Homeowners	856,175	71%
Black or African American (Non-Hispanic) Homeowners	278,756	23.2%
Native American (Non-Hispanic) Homeowners	8,112	0.7%
Hispanic or Latino Homeowners	56,840	4.7%
Asian/ Pacific Islander (Non-Hispanic) Homeowners	18,631	1.6%
Two or More Races/Multiracial (Non-Hispanic) Homeowners	71,864	6%
Some Other Race (Non-Hispanic) Homeowners	14,685	1%
Areawide Total Renters	582,761	32%
White (Non-Hispanic) Renters	239,015	41%
Black or African American (Non-Hispanic) Renters	275,037	47%
Native American (Non-Hispanic) Renters	4,520	0.8%
Hispanic or Latino Renters	45,881	7.9%
Asian/ Pacific Islander (Non-Hispanic) Renters	12,039	2%
Some Other Race (Non-Hispanic) Renters	15,490	2.7%
Two or More Races/Multiracial (Non-Hispanic) Renters	39,591	6.8%

Source: <u>B25003: Tenure - Census Bureau Table</u>



Persons belonging to vulnerable populations

Table 26: Breakdown of vulnerable populations

Vulnerable Populations	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Estimate	MID Percentage
Persons at risk of or experiencing homelessness	3,469	0.1%			2,678	0.3%
Older adults (65 Years+)	753,854	16.4%	439,565	17.3%	165,644	17.8%
Persons with disabilities (mental, physical, developmental)	542,533	11.8%	293,026	11.5%	95,918	11.2%
Survivors of domestic violence, dating violence, sexual assault, or stalking	1,632,198	35.6%				
Persons with alcohol or other substance-use disorder	607	0.01%				
Persons with HIV/AIDS and their families	21,816	0.5%				
Public housing residents	174,476	4%	74,607	8%	22,454	3%

Potentially Vulnerable Groups

The table below provides the parish level average annual growth rates for each MID parish across populations, where higher negative numbers indicate increased vulnerability, and higher negative numbers indicate decreased vulnerability. Rates closer to zero indicate less change from the current populations. The change rates



are also averaged for all parishes, showing that on average, across the state, change in demographic vulnerability is modest in a positive or negative direction. By contrast, many parishes show more exaggerated increases in vulnerable populations. The parishes with the highest sum of vulnerable population growth rates, indicating a greater likelihood of future increase in demographic vulnerability and are within the MID areas is Ascension Parish.

Average annual vulnerable population growth rates, from 2012 to 2021; positive values indicate increases in vulnerability while negative values indicate decreases in vulnerability

Parish	Younger than 20	Older than 64	Population with disabilities	Population living in poverty	Population living in mobile homes	Sum of vulnerable population growth rates
Ascension	1%	5%	3%	0%	0%	9%
Assumption	-2%	3%	-2%	-2%	0%	-3%
Jefferson	0%	3%	2%	1%	1%	7%
Lafourche	-1%	2%	1%	1%	-1%	2%
St. Charles	-1%	4%	0%	-2%	-2%	-1%
St. James	-2%	2%	-1%	-3%	1%	-3%
St. John the Baptist	-2%	3%	-1%	-1%	0%	-1%
Terrebonne	-1%	3%	0%	1%	-1%	2%

Table 27: Vulnerable Population Growth Rates by Parish

Source: State of Louisiana Hazard Mitigation Plan <u>state-of-louisiana-2024-hm-plan final.pdf</u>

The rates of growth of vulnerable populations were determined based on American Community Survey (ACS) 5year estimates for population, age, disability, poverty status, and mobile homes. These demographic variables may not be all-inclusive indicators of vulnerability. For instance, proximity to the coast may enhance (through exposure to the hurricane hazard) or reduce (through economic opportunity) vulnerability. It is assumed that the demographic variables listed above represent the outcome of whether proximity to the coast is a net vulnerability or an opportunity at the individual level.



Persons belonging to historically distressed and underserved communities

Table 28: Community Disaster Resilience Zone Population

Vulnerable Populations	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Estimate	MID Percentage
Community Disaster Resilience Zone	35,639	.007%	17,283	48.5%	18,356	51.5%

Source: <u>Home | FEMA Community Disaster Resilience Zones</u>, <u>B01003: Total Population - Census</u> <u>Bureau Table</u>

For this analysis, the state identified populations residing in Community Disaster Resilience Zones and Opportunity Zones. Community Disaster Resilience Zones are areas identified by FEMA utilizing a natural hazard risk assessment index to identify census tracts that are at most risk for the effects of natural hazards, which are becoming increasingly frequent and intense. FEMA is utilizing the National Risk Index datasets, categories of burden from the Climate and Economic Justice Screening Tool, and local and indigenous knowledge to select these areas. There are five areas in the designated MIDs for Hurricane Francine, including the Chitimacha Reservation. These five areas total 18,356 persons. In the disaster-declared area, there are 12,282, including the Coushatta and the Tunica-Biloxi Reservations. Finally, there are 35,639 persons residing in FEMA-designated Community Disaster Resilience Zones statewide. By having this designation, communities are able to provide a geographic focus for financial and technical assistance from public, private, and philanthropic agencies and organizations for the planning and implementation of resilience projects. This support will provide additional resources to reduce the impact of natural hazards.

Indigenous populations and tribal communities

Federally Recognized Tribes	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
4	27,605	0.6%	19,107	0.7%	13,406	1.4%

Table 29: Disaster impact on the Indigenous population

Source: B02001: Race - Census Bureau Table



There are four federally recognized tribes in Louisiana - Chitimacha Tribe of Louisiana, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, and the Tunica-Biloxi Indian Tribe. In addition, there are twelve staterecognized tribes in Louisiana, all of which fall under the auspices of The Tribal Affairs Office located in the Governor's Office. In consultation with the Tribal Affairs Office, LOCD-DR will hold meetings to communicate with and secure additional input and data on the impact of Hurricane Francine within their communities and to get feedback on the Action Plan in its entirety. Additionally, tribe representatives will be invited to participate in the Action Plan public hearings and meetings held in their respective regions. The prospective meeting dates are listed below. Additional meetings will be scheduled upon request as necessary. The agenda and meeting minutes will be maintained as official record and as documentation of the consultative process.

Throughout the State, 27,605 persons in Louisiana identify as American Indian or Alaska Native (AIAN) alone. Of this total population, 19,107 reside in the disaster declared area, and 13,406 reside in the MID area. At 1.4 percent, the AIAN population in the MID area is over twice the percent in the state overall. Terrebonne Parish has 5,765 people identifying as AIAN, which is 5.6 percent of its population, the highest percent of any parish in the state.

Racially or ethnically concentrated areas of poverty (R/ECAPs)

Table 30: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)
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(R/ECAPs)	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
	327,684	7.16%	162,447	3.7%	24,408	0.5%
L	l allu ar Ethniad	L Concentrated	Aroos of Poworty)pop Dot	o Sito

Source: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) | HUD Open Data Site

The U.S. Department of Housing and Urban Development defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) as census tracts with a poverty rate exceeding 40 percent and where over 50 percent of the population belongs to racial or ethnic minorities. According to the data, the State exhibits significant disparities in poverty rates. Invest in Louisiana (formally the Louisiana Budget Project) provided data regarding the current status of poverty in Louisiana. As of 2022 the poverty rate for the State was the second highest in the nation. The share of Louisianans living in poverty account for 18.6 percent of the state or 829,565 individuals living below the poverty line.



Of all the R/ECAPs in the MID areas, the majority of the R/ECAPs are in Jefferson Parish. In the disaster declared area, the parishes with the highest population of persons within R/ECAPs mirror the parishes with the highest population, East Baton Rouge and Orleans. This historic inequity and deep poverty provide an additional challenge for individuals to recover from storm events, and particularly more so after repeated storm events.



CDBG-DR Programs

The following table provides an overview of the CDBG-DR program allocations and funding thresholds. This table highlights the connection between proposed programs and projects with the unmet needs identified in this Action Plan's Unmet Needs Assessment.

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Allocation Amount	% of CDBG- DR Allocation*
Administration (5% cap)	N/A	N/A	100%	\$5,897,300	5%
Planning (15% cap)	N/A	N/A	100%	\$2,000,000	2%
Rental Housing	\$34,425,000	7%	0%	\$0	0%
Owner-Occupied Housing	\$434,511,000	85%	100%	\$110,048,700	93%
Infrastructure	\$36,552,360	7%	0%	\$0	0%
Economic Revitalization	\$7,833,053	2%	0%	\$0	0%
Public Services (15% cap)	\$0	0%	0%	\$0	0%
Exempt Public Services (no cap)	\$0	0%	0%	\$0	0%
Total	\$513,321,414	100%	100%	\$117,946,000	100%
Funds that have not been allocated:				\$0	0%

Table 31: CDBG-DR Program Allocation and Funding Thresholds



Connection between needs and proposed programs

As required, the LOCD-DR will allocate at least 80 percent of the funds to address unmet needs with HUDidentified "most impacted and distressed" areas and the remainder will be allocated to additional Parishes identified by the state as most impacted and distressed. The state finds additional housing needs in St. Charles and St. James Parishes. As such, the state will make eligible any homeowners in those parishes to apply for assistance through the homeowner repair and associated programs.

At least 70 percent of all program funds will benefit LMI persons or households. The Restore Louisiana Homeowner Assistance Program (RLHP) will prioritize assisting LMI persons in the HUD and State-identified MID parishes by providing a preference to those households meeting the LMI income requirements. Through intentional outreach and selection criteria, the state will attempt to maximize access of the program to LMI households to ensure it is meeting the overall benefit requirement. The state will also assess the status of eligible unmet needs of LMI persons and non-LMI persons and determining, at an appropriate stage, whether to request a modification of the requirement.

This action plan primarily considers and addresses housing needs along with mitigation activities incorporated into its home repair program. While homeowner need is 85 percent of the overall need in the region, the State has decided to allocate 93 percent of its CDBG-DR funding to its Restore Louisiana Homeowner Assistance Programs and additional funds for planning efforts that can support risk reduction strategies, including plans for infrastructure development. The state has considered the varying needs of the region and based on the proportional need of homeowners, has determined the greatest impact of this grant will be made by prioritizing resources for the most severely impacted owner-occupied housing and for planning activities. The state has found \$435 million in remaining unmet housing needs among impacted homeowners.

The state is still assessing the potential infrastructure and housing needs that will and will not be covered by FEMA or other resources, and the unmet needs assessment will be updated as the state receives additional information.

Hazard Mitigation Measures

As discussed in the MNA, the parishes impacted by this disaster face similar and ongoing hazard threats that repeatedly impact the region. The most common hazard is flood and tropical storm related winds. As in the past, to address continuous risk to the housing stock of the communities throughout the region, the State will incorporate risk reduction measures as part of all housing recovery activities. The state will meet the 15 percent mitigation set-aside requirement through planning activities that aim to reduce hazard risks in communities



impacted by the disaster and through resilient building standards incorporated into the Restore Louisiana program for major reconstruction and repair, as well as voluntary buyouts.

Protected Classes

The state's housing programs are designed to address the needs of individual and households affected by the hurricanes, with the great majority focused on LMI households. Historically, the overlap of those two characteristics has presented a significant percentage of African American participants, though the demographics of any particular area impacted by a disaster event will impact the makeup of the eligible beneficiaries. As with any event that broadly affects a populated geographic area, it is anticipated that all protected classes will be represented among the population intended to benefit from the programs.

When a community is known to have disaster impacts but has an apparent underrepresentation of applicants to participate in programs—especially for more vulnerable or historically underserved communities—the state enlists the assistance of local stakeholders, including elected officials, in publicizing program opportunities and encouraging participation.

Implementation of programs includes designing processes in a manner to anticipate potential obstacles to obtaining or identifying information or to accessing resources. A major element of this method includes an interactive relationship with the FEMA Disaster Case Management program. Where needed and requested, translators (language and sign) and readers (for visually impaired) are provided. Where necessary for an individual to participate as a direct beneficiary in programs, legal services are provided to eliminate obstacles to participation (i.e., eliminating title issues and legal proceedings to address legal capacity issues). Physical locations for applicant participation are to be compliant with accessibility standards. Where an applicant cannot participate either in person or through online website access, applications may be taken telephonically, with any necessary signatures subsequently being obtained.

Minimize Displacement

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



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

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

Program Allocations and Award Caps

Administration

The state allocates \$5,897,300 of the total CDBG-DR award for administrative costs associated with the grant. This equates to 5 percent of the total grant, within the 5 percent cap allowed for administrative costs.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation			
Administration Total:	\$5,897,300	\$5,897,300 5.00%			
Total	\$5,897,300	5.00%			

Table 32: Grantee Administration Activity(ies) Overview

Planning

The state allocates \$2,000,000 of the total CDBG-DR award for plannings costs, within the maximum of 15 percent allowed under the program. This will incorporate long-term recovery mitigation planning activities, as well as limited funding for planning activities associated with the production of this Action Plan.



Table 33: Grantee Planning Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation		
Long-Term Recovery Mitigation Plans	\$1,900,000	1.6%		
State Action Plan	\$100,000	0.0008%		
Planning Total:	\$2,000,000	1.69%		
Total	\$2,000,000	1.69%		

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

Additionally, the state has procured a national consulting firm to conduct an analysis of unmet disaster recovery and hazard mitigation needs. The unmet and mitigation needs analysis incorporates a range of data sources to provide a comprehensive picture of the recovery and risk reduction needs of the state. Results will inform program allocation decisions and will be included in the Action Plan.

The state has incurred these planning costs prior to executing its grant agreement with HUD and therefore anticipates requesting reimbursement of pre-agreement activities under this program.



Housing

Housing Programs Overview

Table 34: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation for LMI Benefit		
Restore Louisiana Homeowner Program	\$108,248,700.00	91.78%		
Interim Housing Assistance	\$1,500,000.00	1.27%		
Flood Insurance Program	\$300,000.00	0.25%		
Housing Program Total:	\$110,048,700.00	94.30%		
Total	\$110,048,700.00	94.30%		

Restore Louisiana Homeowner Program

Program Title: Restore Louisiana Homeowner Program

Amount of CDBG-DR Funds Allocated to this Program: \$108,248,700

Eligible Activity(ies): HCDA Sections 105(a)(1), 105(a) (3-4), 105(a)(7-8)

National Objective:

- Benefit to low-and moderate-income persons or households;
- Urgent Need

Lead Agency and Distribution Model: The State of Louisiana Office of Community Development – Disaster Recovery will administer the Restore Louisiana Homeowner Program (RLHP). Distribution process will be direct implementation.

Program Description:



Program Narrative and Tie to Qualifying Disaster

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

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

The funded projects will require LOCD-DR designed standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana's affordable housing industry.

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

The following are ineligible activities:

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

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



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

- Program Managed (Solution 1): The state manages and completes the construction process for the
 rehabilitation or reconstruction of damaged homes on behalf of homeowners. The state will contract with
 a pool of contractors and assign them to repair or reconstruct damaged properties in a resilient manner.
 The state will require contractors to provide Solution 1 grantees with a one-year warranty on
 construction. Notifications reminding homeowners of the expiration date of the warranty will be sent to
 homeowners.
- Homeowner Contracted Program (Solution 2): Homeowners choose to manage their own rehabilitation or reconstruction process with the state providing construction advisory services for all homeowners in this track. Homeowners will select their own home building contractor(s) and contract directly with homebuilding contractors to rebuild in a resilient manner as well as enter a grant agreement with the state for the CDBG-DR funding. The state will monitor all projects in the Homeowner Contracted Program.
- Reimbursement (Solution 3): Homeowners who have completed partial or full repairs to their home before applying to the program may be eligible for reimbursement of eligible expenses incurred prior to application to the program.
- Voluntary Buyouts (Solution 4): The state will offer and conduct large-area voluntary buyouts as an
 allowable mitigation activity (on the block or neighborhood scale) for residents who own property located
 in repetitive loss areas, areas within FEMA designated floodways, and/or areas subject to moderate or
 high flood risk. Such buyout programs will include provisions for community-oriented assistance to
 homeowners in order to facilitate a successful transition to a location of lower flood risk outside of SFHAs.

Connection to Unmet Needs Assessment

This program is only available to applicants who sustained damage to their home as a result of Hurricane Francine and are determined eligible for the program. The state's unmet needs assessment estimates there are over 5,500 homeowners that received individual assistance and have an existing unmet need that could be addressed through the RLHP.

Housing recovery is the top priority for the state's CDBG-DR program, as justified through the unmet needs assessment. The RHLP will be the primary program serving those Louisiana households still in need of housing assistance in order to fully recover from damage caused by Hurricane Francine.



Anticipated Accomplishments

Through this program, the state expects to assist a portion of the pool of approximately 5,500 homeowners with existing unmet which are found to be eligible for CDBG-DR assistance to repair, reconstruct, or elevate their damaged homes, ensuring they are safe, sanitary, and more resilient to future disasters. Additionally, the program will prioritize serving low- to moderate-income households, elderly homeowners, and households with individuals with disabilities to ensure equitable recovery outcomes. Ultimately, the RLHP will play a critical role in the recovery and rebuilding process, ensuring that homeowners are able to return to safe and secure housing.

Eligible Geographic Areas: MID parishes: Ascension, Assumption, Jefferson, Lafourche, St. John the Baptist, St. Mary, Terrebonne, St. Charles, St. James.

Other Eligibility Criteria: Homeowners will be eligible for the program if they meet the following criteria:

- Owner-occupant at time of disaster event
- Damaged property address was the applicant's primary residence at the time of disaster event
- Located in one of MID parishes
- Sustained damage as a result of any of the declared disasters
- Eligible structure as determined by program, including but not limited to, single family residences, duplexes, mobile homes, and resilient manufactured (modular) housing units.

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

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



RESTORE LOUISIANA Homeowner Assistance Program		you must hav (1) owned an (2) occupied (3) sustained	Based on current funding limitations and federal guidance, to be placed in a phase, you must have: [1] owned and still own the damaged home [2] occupied the home at the time of the disaster [3] sustained major/severe damage [per FEMA] [4] NOT received or expect to receive structural insurance payments greater than \$25k				
APPLICA	TION PHASES	PHASE I	PHASE II	PHASE III	PHASE IV	PHASE V	PHASE VI
	LESS THAN 50% AMI	 Image: A start of the start of					
HOUSEHOLD INCOME	BETWEEN 50% & 80% AMI		 	 Image: A start of the start of			
	GREATER THAN 80% AMI				~	~	~
GEOGRAPHY	MOST IMPACTED			N/A N/A	 		N/A
	OTHER IMPACTED	N/A	N/A			 	
HOMEOWNER 62+ AND/OR HOUSEHOLD MEMBER WITH DISABILITY	YES		 		N/A	N/A	N/A
	NO	N/A		~			
STATUS OF REPAIRS	COMPLETE		N/A	N/A			
	INCOMPLETE	N/A			~	~	

AMI = AREA MEDIAN INCOME

Figure 12: Restore Louisiana Homeowner Assistance Program application phases based on income, geography, age/disability status, and repair status.

Maximum Amount of Assistance Per Beneficiary: Maximum award will be determined by the scope of work based on standard/economy grade building materials as calculated by the program using national building standard estimating software, less any duplication of benefits (e.g., NFIP, FEMA or SBA) with a maximum award of \$425,000, excluding any program project delivery costs. Duplication of Benefits is defined further in the program policies and procedures. The state will include details of the program standards in its policies and procedures.

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

Maximum Income of Beneficiary: The Restore Louisiana Program does not set a cap on income. Those qualifying under the low- to moderate-income national objective, which is defined by HUD as households earning no more than 80 percent of the area median income (AMI), will be prioritized (with very low-income households, less than 50 percent AMI, with highest priority). Specific income limits will be published in the program policies and procedures and will be based on the current HUD income limits and based on household size and parish. These income limits may be updated on an annual basis in accordance with HUD's most recent published data.



Mitigation Measures: The State of Louisiana intends to promote high quality, durable and energy efficient construction methods. All rehabilitation, reconstruction, or new construction will meet an industry-recognized standard that has achieved certification under at least one of the Green Building Standards. In addition, 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.

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

The funded projects will require LOCD-DR designated standards of safety, environmental sustainability, and resilience to storm hazards, which will not only ensure the longevity and quality of those projects but will also positively influence design and building standards for Louisiana's affordable housing industry.

The Program will consider elevations for properties located within the floodplain that are required to be elevated by local ordinance and the local code enforcement officials' determination that a property is substantially damaged or will be substantially improved. The Program will also consider elevations for properties outside of the floodplain which are required to be elevated by local ordinance as part of a reconstruction.

Buyouts under Solution 4 will promote resiliency across the impacted area by maintaining the properties as open space in perpetuity.

The state will utilize its allocation of mitigation set-aside funds in the implementation of RLHP for those activities will meet the definition of mitigation, defined as activities that increase resilience to disasters, and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disaster. Buyout, elevation, and reconstruction activities which move residents that are in harm's way to a safer area where loss of life and property is far less likely, along with restoring land to its natural state to lessen the impact of future disasters on the surrounding area will be funded under RLHP with the state's mitigation set-aside funding.

Reducing Barriers for Assistance: The State of Louisiana is committed to ensuring access to disaster recovery assistance for all individuals, including protected classes, vulnerable populations, and historically underserved communities. To identify barriers, the state will continue to engage community-based organizations, advocacy groups, and local governments to gather insights into specific challenges these populations as programs are rolled out to impacted communities. The state is utilizing the results of the unmet needs and fair housing and civil rights assessment of this Action Plan to help identify areas that may require additional engagement or language support. Additionally, program data may be monitored to identify disparities in application rates,



approval rates, and access to recovery resources, allowing the State to address gaps in service delivery proactively.

Methods to reduce barrier to access will include translating program materials into commonly spoken languages in impacted areas, providing interpreters for public meetings, and ensuring physical accessibility for individuals with disabilities, all in accordance with the state's Citizen Participation Plan. To the greatest extent feasible, application processes will be streamlined to reduce complexity. Targeted outreach campaigns will be conducted in underserved areas, leveraging trusted local organizations and communication channels like social media and radio to reach hard-to-reach populations.

The state's top priority at this time is for safe, decent, and affordable housing for vulnerable populations, protected classes, and underserved communities. For the owner-occupied housing programs, low- and moderate- income households, households with a head of household that is 62 or older, or individuals with disabilities are prioritized. In the tenant-based programs, the state will prioritize these vulnerable populations as well as persons displaced by the disaster event in need of affordable housing.

This program is only available to those vulnerable homeowners who cannot afford flood insurance and are at risk of not being covered by flood insurance in the event of a future disaster. This program specifically targets LMI households. As with all CDBG-DR programs, key documents will be translated, and translation services will be provided in accordance with the state's Language Access Plan. Outreach will be conducted in impacted parishes to ensure impacted populations are informed of the eligibility requirements and benefits available under this program.

Interim Housing Assistance

Program Title: Interim Housing Assistance

Amount of CDBG-DR Funds Allocated to this Program: \$1,500,000.00

Eligible Activity(ies): Interim housing assistance, Rental assistance to displaced homeowners, HCDA Sections 105(a)(8); applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754) and other applicable notices or guides, other applicable waivers or alternative requirements.

National Objective: Benefits to low and moderate income persons.



Lead Agency and Distribution Model: The State of Louisiana Office of Community Development – Disaster Recovery will administer the Restore Louisiana Homeowner Program (RLHP) – Interim Housing Assistance. Distribution process will be direct implementation.

Program Description:

Program Narrative and Tie to Qualifying Disaster

The Interim Housing Assistance Program will provide prospective interim mortgage assistance for up to 20 months or rental assistance for up to 24 months and/or temporary hotel assistance for up to an estimated 90 days to eligible homeowners whose households are at or below 80 percent AMI, are actively working through the RLHP and are either:

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

To demonstrate tieback to Hurricane Francine, eligible recipients of Interim Housing Assistance must working through the RLHP as a direct result of damage caused by Hurricane Francine.

Connection to Unmet Needs Assessment

The Interim Housing Assistance Program, as a complementary program to RLHP, recognizes that the same pool of impacted residents identified in the state's unmet needs assessment may need additional support through temporary assistance if their house is uninhabitable due to the rehabilitation or reconstruction work taking place under RLHP. Like RHLP, this program is only available to applicants who sustained damage to their home as a result of Hurricane Francine and are determined eligible for the program.

Anticipated Accomplishments

This program will support LMI households through interim housing assistance.

Eligible Geographic Areas: MID parishes: Ascension, Assumption, Jefferson, Lafourche, St. John the Baptist, St. Mary, Terrebonne, St. Charles, St. James.

Other Eligibility Criteria:



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

Maximum Amount of Assistance Per Beneficiary:

- Mortgage Assistance: On a monthly basis, up to the lesser of the mortgage house payment or additional interim housing cost incurred for up to 20 months. Based on such factors as the percentage of adjustment and the administrative burden of making programmatic adjustments mid-way through a program, the state may adjust the maximum amount per month a household is eligible to receive if or when HUD published fair market rents are adjusted.
- Rental Assistance: On a monthly basis, up to the maximum current fair market rents based on the household size, for up to 24 months. Based on such factors as the percentage of adjustment and the administrative burden of making programmatic adjustments mid-way through a program, the state may adjust the maximum amount per month a household is eligible to receive if or when HUD published fair market rents are adjusted.
- Temporary Hotel Assistance: The maximum amount is based on state limits, detailed in PPM 49: https://www.doa.la.gov/Pages/osp/Travel/TravelPolicy.aspx. The appropriate number of rooms will be provided based on family size. Hotel assistance is limited to the earlier of when the repairs or reconstruction is complete or an estimated 90 days. Extensions to this time limit will be considered on a case-by-case basis, when there are exigent circumstances. Some may transition from hotel to interim rental or mortgage assistance, but in no case will recipients receive more than 20 months of assistance.

Maximum Income of Beneficiary: The Interim Housing Assistance Program will be limited to assisting low- to moderate-income persons and households, which is defined by HUD as households earning no more than 80 percent of the area median income (AMI). Maximum income limits will be set to the current 80 percent of the AMI for each eligible parish, based on household size, as published by HUD.

Mitigation Measures: The Interim Housing Assistance program will not utilize mitigation set-aside funds.

Reducing Barriers for Assistance: As a complementary program to RLHP, the methods for reducing barriers for assistance detailed under that program will be leveraged for the Interim Housing Assistance Program as well.



Flood Insurance Assistance Program

Program Title: Flood Insurance Assistance (FIA) Program

Amount of CDBG-DR Funds Allocated to this Program: \$300,000.00

Eligible Activity(ies): HCDA Section 105(a)(4), applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754) and other applicable notices or guides, other applicable waivers or alternative requirements.

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

Lead Agency and Distribution Model: The State of Louisiana Office of Community Development – Disaster Recovery will administer the Restore Louisiana Homeowner Program (RLHP) – Flood Insurance Assistance. Distribution process will be direct implementation.

Program Description:

Program Narrative and Tie to Qualifying Disaster

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

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

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



available to applicants who sustained damage to their home as a result of Hurricane Francine and are determined eligible for the RLHP.

Connection to Unmet Needs

The state's unmet need analysis found that approximately 47 percent of homeowners that suffered damage from Hurricane Francine did not have insurance. Additionally, approximately 80 percent of the 1900 households identified under the RLHP do not have flood insurance. Per census data, the impacted parishes have poverty levels between 12 and 25 percent amongst homeowners. This program will specifically target those homeowners facing financial hardship to secure flood insurance for one year and will provide financial guidance to support the homeowners' ability to maintain flood insurance in the future.

Anticipated Accomplishments

This program will support LMI households facing financial hardship, which are located in Special Flood Hazard Areas (SFHA) and require flood insurance coverage.

Eligible Geographic Areas: MID parishes: Ascension, Assumption, Jefferson, Lafourche, St. John the Baptist, St. Mary, Terrebonne, St. Charles, St. James.

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

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

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

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

Additional eligibility requirements are as follows:

• Homeowner must be eligible recipient of CDBG-DR grant funds in the RLHP; and



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

Maximum Amount of Assistance Per Beneficiary: One-year term flood insurance premium not to exceed \$2,000.

Maximum Income of Beneficiary: The Flood Insurance Assistance Program will be limited to assisting low- to moderate-income persons and households, which is defined by HUD as households earning no more than 80 percent of the area median income (AMI). Maximum income limits will be set to the current 80 percent of the AMI for each eligible parish, based on household size, as published by HUD.

Mitigation Measures: The Flood Insurance Assistance Program will not utilize mitigation set-aside funds.

Reducing Barriers for Assistance: This program is only available to those vulnerable homeowners who cannot afford flood insurance and are at risk of not being covered by flood insurance in the event of a future disaster. This program specifically targets LMI households. As a complementary program to RLHP, the methods for reducing barriers for assistance detailed under that program will be leveraged for the Flood Insurance Assistance Program as well.

CDBG-DR Mitigation Set-Aside

The state has conducted a mitigation needs assessment in accordance with the Appropriation Law (PL 118-158), which requires the state to allocate 15 percent of its grant (\$15,384,000) to activities that reduce risk to future hazards.

All activities funded through this CDBG-DR allocation will include elements that reduce hazard risk, and thus, meet HUD's definition of mitigation:

Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.



The State of Louisiana will utilize its 15 percent CDBG-DR mitigation set-aside funds by integrating mitigation measures directly into its RLHP, rather than creating stand-alone mitigation programs. These programs will incorporate minimum resiliency requirements to ensure that funded projects reduce risks from future disasters while addressing recovery needs. Mitigation measures will include strategies such as elevating homes and incorporating resilient building materials and design standards. The specific details of how the home repair program meets the mitigation set-aside requirements are outlined in its program descriptions, ensuring compliance with HUD regulations while promoting long-term safety and resilience in disaster-impacted communities.

Table 35: CDBG-DR Mitigation Set-Aside Allocation Summary

Eligible Cost Category	Unmet Need	Percent of Unmet Need	Percent of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Mitigation Set- Aside Allocation Amount	Percent of CDBG-DR Allocation Mitigation Set- Aside ¹⁶
Admin (5% cap)			100%	\$0	0%
Planning (15% cap)			100%	\$1,900,000	12.35%
Housing	\$95,309,914	78%	100%	\$13,484,000	87.65%
Total	\$95,309,914	78%	100%	\$15,384,000	100%
Funds that have not been allocated:				\$0	0%
Grant Total (Recovery funds + Mitigation + Unallocated):				\$117,946,000	100%

¹⁶ At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.



Connection to Mitigation Needs Assessment

Restore Homeowner Program

All residential buildings undergoing reconstruction or substantial improvement funded through the Restore Homeowner Program will adhere to HUD's Green and Resilient Building Standards, which require that such structures are built to IBHS Gold Fortified standards. Additionally, homeowners that are not in need of reconstruction or substantial improvements may choose to meet these standards, up to a program cap. Furthermore, per HUD requirements, residential buildings undergoing new construction or substantial improvement and located in the FFRMS floodplain, the lowest floor must be designed using the elevation of the FFRMS floodplain as the baseline standard for elevation. Finally, Solution 4 of RLHP offers voluntary buyouts to support the mitigation of repeated flood risk.

Resilience Planning

The state's proposed plan budgets sufficient funding for planning initiatives to establish mitigation measures and build more resilient communities through education, outreach, and funding. LOCD-DR recognizes the need for such efforts and has been working closely with local governments in the HUD-identified MID areas that are developing and executing local strategic plans and disaster recovery plans grounded in community resilience.

The state may provide funding to enhance capacity in the local emergency response, drainage, floodplain management, and planning/permitting departments of local and regional public entities impacted by the disaster. This program may support activities including, but not limited to, the creation, revision, or enhancement of planning tools or plans, staff capacity, hiring, or training, and other planning costs associated with resilient recovery processes and safe development practices.

General Exception Criteria

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

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



General Information

Citizen Participation

Outreach and Engagement

In developing this disaster recovery action plan, the LOCD – DR consulted with stakeholders, local governments, public housing authorities, and other affected parties in impacted areas to ensure that the recovery efforts outlined in the plan align with existing initiatives and that the planning process is both comprehensive and transparent.

Interagency Recovery Coordination Overview

The FEMA Interagency Recovery Coordination (IRC) program supports states, territories, tribal nations, and local governments in their disaster recovery efforts by coordinating resources and providing technical assistance.

The state has leveraged collaboration across FEMA programs and with state and federal agencies to identify various barriers to recovery, including housing shortages and infrastructure repairs. Through this coordination, the state has prioritized key recovery initiatives to maximize CDBG-DR funding for housing recovery, enhance disaster resilience through mitigation planning, and offer technical assistance to local governments for sustained recovery.

The IRC works under the guidelines of the National Disaster Recovery Framework (NDRF) with teams of specialists from FEMA and other federal agencies to mobilize and coordinate technical assistance, resources, and subject matter experts to execute long-term solutions following a disaster.

Long Term Recovery Subcommittee Overview

Originally in response to the Great Floods of 2016, the Long-Term Recovery Subcommittee (LTRS) was created as a subcommittee under the Unified Command Group (UCG) in August 2018 as part of the authority of the Louisiana Homeland Security and Emergency Assistance and Disaster Act (Louisiana Disaster Act) – Louisiana Revised Statute 29:725.6(v). The UCG is the state's strategic decision-making body for emergency and disaster response and is comprised of members appointed by the Governor. LOCD-DR along with GOHSEP serve as cochairs of the LTRS. LOCD-DR serves as the planning and implementation arm for strategic mitigation, resilience planning and programming to address community and business needs via Community Development Block Grant allocations through the Department of Housing and Urban Development in the event of disasters.



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

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

The Subcommittee is comprised of key State agencies and local emergency management subject matter experts as listed below:

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

The state has undertaken initiatives to assess recovery needs and identify available resources across multiple sectors.

RSF 1 – Planning & Capacity

RSF 1 assessed local jurisdictions' ability to execute recovery efforts based on hurricane impact data. This assessment, developed with state agencies, municipal associations, planning organizations, and watershed regions, identifies needs such as staffing, training, broadband access, and funding. Monthly meetings ensure continued collaboration.



RSF 2 – Economic Development

Led by Louisiana Economic Development (LED), RSF 2 activated an emergency contract to assess business damages, including physical destruction, revenue losses, and impacts on agriculture and state parks. Findings are being shared to inform financial and technical assistance programs.

RSF 3 – Health & Human Services

RSF 3, in partnership with local VOAD organizations and advocacy groups, developed a matrix of needs to address immediate and long-term health and housing concerns, including trauma from displacement and ongoing recovery challenges.

RSF 4 – Housing

The Louisiana Housing Task Force—activated due to significant housing impacts—is working with HUD to conduct a Housing Assessment through virtual interviews. This effort includes HUD-owned properties, private residences, rental properties, and publicly owned land and facilities to expand affordable housing options. Outreach efforts involve federal agencies, local governments, nonprofits, developers, and residents.

RSF 5 – Infrastructure & RSF 6 – Natural & Cultural Resources

These RSFs are working with FEMA Public Assistance (PA) teams, regional outreach teams, and local jurisdictions to assess damage to infrastructure, wetlands, state parks, and historical sites. Additionally, the state convened a consultation conference with affected public housing authorities to prioritize flood mitigation efforts and discuss the allocation of Hurricane Francine CDBG-DR and MIT funds.

The state continues to drive coordinated and effective recovery efforts through data-driven assessments, stakeholder engagement, and targeted resource allocation.

Consultation of Developing the Action Plan

To ensure that the Action Plan reflects the comprehensive recovery needs of communities impacted by Hurricane Francine, the state has engaged in ongoing meetings and consultations with a wide range of partners and stakeholders since the disaster occurred. These consultations have been critical in aligning recovery efforts with existing initiatives, leveraging available funding, and addressing the needs of protected classes, vulnerable populations, and other underserved communities.

As part of the consultation process, the state completed targeted consultations with the impacted parishes to better understand local recovery needs and priorities. These meetings allowed parish officials to provide



detailed input on unmet needs, potential projects, and barriers to recovery. Additionally, the state has maintained regular and ongoing communication with stakeholders, including partners at state agencies including GOHSEP and LHC to ensure their feedback continues to inform the development and implementation of recovery programs.

The following table summarizes the consultations conducted during the development of the Action Plan, including the agencies, organizations, and community groups engaged, along with the methods and key outcomes of these consultations.

Partners Consulted	Describe Consultation		
Federal Partners (FEMA, SBA)	Consultations with FEMA focused on data-sharing agreements, funding gaps, and technical assistance for local governments to ensure that FEMA Individual Assistance (IA) aligns with Community Development Block Grant Disaster Recovery (CDBG-DR) funds. Discussions with the SBA centered on coordinating disaster loans, addressing funding gaps for small businesses, and aligning SBA and HUD programs to support economic recovery.		
	GOHSEP collaborated with the FEMA Interagency Recovery Coordination (IRC) Team to assess damage and mobilize recovery efforts in affected parishes.		
	The U.S. Army Corps of Engineers (USACE) focused on infrastructure planning and mitigation, including the PAS program.		
	The U.S. Department of Agriculture (USDA) provided support for agricultural recovery and economic development.		
	The Economic Development Administration (EDA) worked on economic recovery strategies and resource allocation.		
	The Environmental Protection Agency (EPA) implemented risk mitigation and environmental resilience initiatives.		
	GOHSEP shared post-disaster damage assessments under FEMA's Public Assistance and Individual Assistance programs to aid in the analysis of unmet needs.		
	The Crisis Counseling Program (CCP) used standardized data collection tools from FEMA, GOHSEP, and SAMHSA to assess high-risk populations.		
	SBA Development Centers are being employed to support small businesses and homeowners affected by disasters, ensuring alignment between SBA and HUD programs for economic recovery.		
Local/State	Engagements with state and local governments, including Terrebonne Consolidated		

Table 36: Consultations During Action Plan Development



Government	Government, Ascension Parish Emergency Management, and the Louisiana Office of Community Development – Disaster Recovery (LOCD-DR), addressed infrastructure damage, housing shortages, and funding challenges. GOHSEP played a key role in coordinating FEMA funds and disaster recovery planning, while local governments sought technical assistance and additional resources to bridge financial gaps.			
	GOHSEP and LOCD-DR coordinated with local parish governments on damage assessments and unmet needs evaluations.			
	LOCD-DR offers ongoing technical assistance to local governments.			
	Terrebonne Consolidated Government is addressing recovery challenges, including housing shortages and infrastructure repairs.			
	Terrebonne Levee District focuses on FEMA Public Assistance (PA) projects, funding burdens, and infrastructure improvements.			
	Ascension Parish Emergency Management coordinates efforts related to infrastructure damage, funding gaps, and unmet recovery needs.			
	The Louisiana Housing Corporation (LHC) conducted pre- and post-storm outreach to over 1,500 properties to assess housing damage and availability.			
	LOCD-DR conducted before-and-after storm notifications to contractors and homeowners under the Restore program.			
	LED published "The Economic Impact of Hurricane Francine" to inform decision- making at state and local levels.			
	CPRA engaged local communities for post-storm damage assessments and operational successes.			
Indian Tribes	Consultations with federally recognized tribes identified housing and infrastructure damage, the need for tailored disaster assistance, and funding opportunities for resilience and mitigation projects. Coordination with HUD and FEMA focused on ensuring equitable access to recovery resources for tribal communities.			
Nongovernmental organizations	Nonprofit and faith-based organizations played a vital role in providing housing support, food security, and emergency shelter initiatives. Continuous collaboration with community groups and the Community Assistance Tool (CAT) enhanced data collection, resource tracking, and integration into disaster recovery planning.			
	RSF3 worked alongside nonprofit agencies to evaluate the impacts on housing, behavioral health, food insecurity, and economic challenges.			
	The Louisiana Spirit Crisis Counseling Service offered mental health services at Disaster Recovery Centers.			
	Additionally, Psychological First Aid (PFA) training was provided for 109 individuals.			



Private sector	Engagements with the Economic Development Administration (EDA), Delta Regional Authority, and USDA focused on economic recovery, infrastructure investment, and support for small businesses. These initiatives aim to promote long-term development and ensure that disaster-impacted businesses and rural communities receive sufficient funding.		
	RSF2's report evaluated the economic impact of Hurricane Francine, highlighting disruptions to businesses and the workforce.		
	The Louisiana Business Emergency Operations Center (LABEOC), a collaboration between the Louisiana Economic Development (LED), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and the National Incident Management Assistance Team (NIMSAT) at the University of Louisiana at Lafayette, was activated to connect with the private sector.		
	LED's Community Competitiveness Initiative monitored how well private sector businesses adhered to emergency preparedness guidelines.		
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	GOHSEP and local emergency management agencies played a central role in administering FEMA funds, identifying infrastructure and housing needs, and navigating complex funding requirements. Coordination efforts emphasized aligning state and federal resources to maximize recovery efficiency.		
	GOHSEP coordinated damage assessments and financial projections for FEMA funding applications.		
	GOHSEP structured a state-level funding threshold for smaller disasters that do not meet FEMA declaration requirements.		
	GOHSEP led validation of 4,300+ virtual damage assessments to support Individual Assistance requests.		
Agencies that manage local Continuum of Care	Local Continuum of Care organizations addressed homelessness and housing instability, focusing on temporary and permanent housing solutions. Consultations prioritized integrating disaster-affected individuals into housing programs and leveraging CDBG-DR funds to assist vulnerable populations.		
	RSF3 worked with health and human service agencies to assess behavioral health needs and food insecurity.		
	Crisis Counseling Program (CCP) engaged local agencies to deliver services in impacted areas.		
Public Housing Agencies	Public Housing Authorities collaborated on assessing and repairing disaster- damaged public housing units, securing FEMA and HUD funding, and implementing relocation assistance for displaced residents. Efforts focused on ensuring long-term		



	housing stability for affected communities. The Louisiana Housing Corporation (LHC) conducted damage assessments of affordable housing units and evaluated construction delays post-Francine.		
HUD-approved housing counseling agencies	Housing counseling agencies offered feedback on CDBG-DR and FEMA housing programs, foreclosure prevention, and financial planning for homeowners affected by disasters. These efforts aimed to enhance access to resources and long-term housing recovery strategies.		
State Housing Finance Agencies	The Louisiana Housing Corporation (LHC) has led discussions on expanding affordable housing, addressing funding gaps for low-income households, and supporting rehabilitation and reconstruction efforts.		
Other Stakeholders	Consultations with the U.S. Army Corps of Engineers (USACE), the Environmental Protection Agency (EPA), and the Silver Jackets team focused on flood risk management, infrastructure resilience, and environmental mitigation strategies. The discussions highlighted the need for additional funding for levee repairs, planning for saltwater intrusion, and sustainability initiatives.		
	The Terrebonne Basin Barrier Island Survey evaluated the effects on coastal protection infrastructure.		
	The CPRA gathered data on floodgate and levee impacts to guide future mitigation planning.		
	GOHSEP is working to enhance emergency management training programs in Louisiana.		
	LOCD-DR will maintain its leadership role in COSCDA to advocate for improvements in disaster recovery policies.		

Public Comments

The LOCD-DR recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input will be provided throughout the planning process through a public comment process that consists of a period for submitting comments on the Action Plan and substantial amendment criteria.

In addition to the activities outlined above, the LOCD-DR has published this Action Plan for a 30-day public comment period, available at <u>https://www.doa.la.gov/doa/ocd/</u>. Citizens will be notified through earned media,



including a statewide press release distributed to major print and broadcast outlets, stakeholder listservs, social media, and traditional marketing channels.

Public Hearings

In line with the requirements noted in the Federal Register Notice for grantees receiving between \$100 million and \$500 million in CDBG- DR funding, the state is required to convene at least two public hearings in HUDidentified MIDs to solicit citizen comments. The public hearing dates are scheduled as listed below:

Table 37: Public Hearing Dates and Information

Public Hearing #	Date	Method	MID Location
1	March 18, 2025	Virtual	All
2	March 24, 2025	Virtual	All

Accessibility of Public Hearings

Initial public hearings held during the development of this Action Plan will be held virtually. The virtual format increases accessibility and reduces participation barriers for vulnerable populations and other protected classes. Participants are able to join from the safety of their homes, making it accessible to those with disabilities, older adults, or those with limited means of transportation. Virtual sessions allow for broad access for impacted and interested populations across the MIDs. Meetings have been planned for both afternoon and evening to accommodate varying availability. All virtual hearings will allow for real-time questions, with answers coming directly from the attending representatives to all attendees. If LOCD-DR determines any in-person public hearings are required related to the CDBG-DR grant and its programs, these hearings will be held in facilities accessible to persons with disabilities, with accommodations to ensure full participation opportunities. The hearings will also be streamed live for citizens to participate remotely, and each session will be recorded, with presentation materials also available online for reference. Allowing citizens to participate remotely removes barriers like lack of childcare and/or transportation that can limit certain populations or communities from participating in public hearings, providing comments, or other engagement events or techniques.



Meaningful Access

The citizen participation process includes special consideration for those with limited English proficiency (LEP) and persons with disabilities. The Action Plan is translated into Spanish and Vietnamese to reach the LEP populations within grant-eligible areas. Citizens with disabilities or those who need technical assistance have been informed to contact the LOCD-DR office for assistance through several avenues made available by:

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

Email: ocd@la.gov; or

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

Citizen Complaints

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

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

There are two types of complaints: formal and informal.

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

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

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



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

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

Appeals

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

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

Modifications to the Action Plan

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

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



Substantial Amendment

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

- 1. A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area));
- 2. The addition or deletion of an activity;
- 3. A proposed reduction in the overall benefit requirement ;
- 4. The allocation or reallocation of the greater of either a re-allocation of more than \$5 million dollars or a reallocation which constitutes a change of 15 percent or greater of a program budget.; and
- 5. An update to the submitted initial Action Plan if the original submission was incomplete (i.e., program award caps or funding criteria).

When the LOCD-DR pursues the substantial amendment process, the amendment will be posted here at https://www.doa.la.gov/doa/ocd/ for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. The LOCD-DR will review and respond to all public comments received and submit to HUD for approval.

Non-substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. The LOCD-DR will notify HUD five (5) business days before the change is effective.

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

Performance Reports

The State of Louisiana will maintain a rigorous and transparent process for completing performance reports to ensure compliance with all CDBG-DR and federal requirements. Performance reporting will be managed by LOCD-DR. This team will oversee internal record-keeping and reporting activities, ensuring that all required data is accurately documented and submitted in a timely manner.

Subrecipients of CDBG-DR funds will be required to submit performance reports no less than quarterly, detailing the progress and status of their funded activities, expenditure of funds, and compliance with program requirements. These subrecipient reports will be reviewed and integrated into the State's Quarterly



Performance Reports (QPRs), which are submitted to HUD through the Disaster Recovery Grant Reporting (DRGR) system.

LOCD-DR will implement internal controls to verify the accuracy and completeness of data, including crossreferencing subrecipient reports with financial records and program monitoring findings. QPRs will provide detailed updates on project milestones, expenditures, and overall program performance, ensuring transparency and accountability throughout the recovery process. The state is committed to submitting all QPRs on time through DRGR and to meeting HUD's performance reporting standards.

To ensure public transparency, QPRs will be posted on the state's CDBG-DR website within three days of submission to HUD. These reports will be accessible to the public under the "Reports" page of the LOCD-DR website at https://www.doa.la.gov/doa/ocd/policy-and-reports/reports/, providing regular updates on the progress of recovery programs and use of funds.



Appendix

Certifications

LOCD-DR acknowledges that it will administer the CDBG-DR grant consistent with the following certifications required by federal statute and regulation:

- a. Compliance with Anti-discrimination Laws—LOCD-DR certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations.
- b. Affirmatively Further Fair Housing—LOCD-DR certifies it will affirmatively further fair housing.
- c. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan—LOCD-DR certifies that it:
 - will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
 - 2) has in effect and is following a RARAP in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- d. Anti-Lobbying—LOCD-DR certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- e. Authority of Grantee—LOCD-DR certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that LOCD-DR, and any entity or entities designated by LOCD-DR,, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- f. Consistency with the Action Plan—LOCD-DR certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- g. Section 3—LOCD-DR certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- h. Citizen Participation—LOCD-DR certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a LOCD-DR must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).



- i. Consultation with Local Governments —LOCD-DR certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian Tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the State.
- j. Use of Funds—LOCD-DR certifies that it is complying with each of the following criteria:
 - Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
 - 2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG–DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - 3) Overall benefit. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
 - 4) Special Assessment. LOCD-DR will not attempt to recover any capital costs of public improvements assisted with CDBG- DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, LOCD-DR certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- k. Excessive Force—LOCD-DR certifies that it has adopted and is enforcing the following policies, and, in addition, State grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:
 - 1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - 2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- I. Grant Timeliness—LOCD-DR certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that LOCD-DR has reviewed the requirements applicable to the use of grant funds.



- m. Lead-Based Paint—LOCD-DR certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- n. Environmental Requirements—LOCD-DR certifies that it will comply with environmental requirements at 24 CFR part 55 (as applicable) and 24 CFR part 58.
- o. Compliance with Laws—LOCD-DR certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.
- p. Order of Assistance—LOCD-DR certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.