



Louisiana Division of Administration

**Office of Community Development –
Disaster Recovery**

U.S. Department of Housing and Urban Development

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

The American Relief Act, 2025 (Public Law 118-158)

Federal Register Docket No. FR-6512-N-01

**State of Louisiana Substantial Action Plan
Amendment No. 1 for the Utilization of
Community Development Block Grant
Funds in Response to 2024 Federal
Declarations in Louisiana**

Public Comment Period for Revisions Made in Substantial Action Plan

Amendment No. 1: Aug. 27 to Sept. 26, 2025

Submitted to HUD: Sept. 29, 2025

HUD Approved: Nov. 13, 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 disaster and enhance resilience against future events.

The recovery programs described in this Action Plan prioritize resilience, focusing on addressing the unmet needs of disaster-impacted 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.



Action Plan Amendment Summaries

ACTION PLAN SUBSTANTIAL AMENDMENT NO. 1 (APA 1)

The U.S. Department of Housing and Urban Development, Office of Disaster Recovery, Policy Division made the determination that HUD’s Universal Notice, 90 FR 1754, requires grantees to establish and disclose a specific maximum income cap for each program that provides direct-benefit activities. A general statement that no income cap is set, even when paired with a commitment to prioritize LMI households, is not sufficient to meet the requirements of the Universal Notice. The purpose of the program-level income cap requirement is to provide transparency around who is eligible for direct assistance; prevent misinterpretation of eligibility; and reinforce the difference between grant level LMI compliance and program level eligibility requirements.

In the Hurricane Francine Master Action Plan, the Restore Louisiana Homeowner Assistance Program (RLHP) did not set a cap on income. The Master Action Plan stated that those qualifying under the low-to moderate-income national objective, which is defined by HUD as households earning no more than 80% of the area median income (AMI), will be prioritized (with very low-income households, less than 50 % AMI, with highest priority). The State is amending the Hurricane Francine Action Plan to set an income cap for eligibility for households earning up to 300% of AMI for the RLHP.

Also, this amendment utilizes the interchangeability of funds provision authorized by Congress, which allows states to use disaster funds interchangeably and without limitation for the same activities related to unmet recovery needs in the MID areas resulting from a major disaster.

APA1 is considered substantial as results in a change in eligibility criteria.

APA 1 Public Comments

No public comments received.



Table of Contents

Introduction	2
Action Plan Amendment Summaries.....	3
<i>ACTION PLAN SUBSTANTIAL AMENDMENT NO. 1 (APA1)</i>	3
Table of Contents	4
Versions and Amendments	6
Executive Summary	7
Overview.....	7
Disaster-Specific Overview	7
Responsible Entity	8
<i>Most Impacted and Distressed Areas</i>	9
<i>Overview of the Impacts of the Qualifying Disaster</i>	10
Unmet Needs and Mitigation Needs Assessments Summary	13
Unmet Needs Assessment	14
Overview.....	14
<i>Population and Housing Demographics of the MID Parishes</i>	16
<i>Disaster Impacts of the MID</i>	17
<i>Impacts of Insurance (HOI and NFIP)</i>	17
Housing Unmet Needs.....	18
<i>Rental and Owner-Occupied Housing Unmet Needs</i>	19
<i>Emergency Shelters, Interim, and Permanent Housing</i>	21
<i>Public Housing (Including HUD-assisted Housing) and Other Affordable Housing Impacted by the Disaster</i>	27
Infrastructure Unmet Needs	27
<i>FEMA Public Assistance</i>	28
<i>Hazard Mitigation Grant Program</i>	29
<i>Morganza to the Gulf Hurricane Protection System (MTG)</i>	30
Economic Revitalization.....	31
<i>Statewide Economic Damage & Loss Assessment</i>	31
<i>Business Interruption Losses</i>	32
<i>Property Losses</i>	33
<i>Agricultural Losses</i>	34
<i>Small Business Administration’s (SBA) Business Economic Injury Disaster Loan Program</i>	35
<i>Summary of Economic Needs</i>	36
Mitigation Needs Assessment	37
Cost of Disasters	38
National Flood Insurance Program.....	39
Repetitive and Severe Repetitive Flood Loss.....	39
Cost of Future Risk.....	41



Greatest Risk Hazards.....	43
<i>Hurricanes/Tropical Cyclones</i>	44
<i>Floods</i>	45
<i>Sea Level Rise</i>	47
<i>Extreme Precipitation</i>	49
CDBG-DR Programs	51
Connection between needs and proposed programs.....	52
Hazard Mitigation Measures	52
Minimize Displacement	53
Program Allocations and Award Caps	53
<i>Administration</i>	53
<i>Planning</i>	54
<i>Housing</i>	55
CDBG-DR Mitigation Set-Aside	66
<i>Connection to Mitigation Needs Assessment</i>	67
General Exception Criteria.....	68
General Information	69
Citizen Participation.....	69
<i>Outreach and Engagement</i>	69
<i>Long Term Recovery Subcommittee Overview</i>	69
<i>Consultation of Developing the Action Plan</i>	71
<i>Public Comments</i>	75
<i>Public Hearings</i>	76
<i>Citizen Complaints</i>	77
Modifications to the Action Plan	78
<i>Substantial Amendment</i>	78
Performance Reports.....	79
Appendix A	81
Certifications.....	81
Appendix B	83
Public Comments.....	83
<i>General Information</i>	83
<i>City/Parish Related</i>	83
<i>Eligibility (Restore)</i>	84
<i>General (Restore)</i>	85
<i>Program Operations (Restore)</i>	86
<i>FEMA</i>	89
<i>Southeast Louisiana Legal Services Not Addressed Above</i>	90
<i>Terrebonne Parish Comments Not Addressed Above</i>	92



Versions and Amendments

Table 1: Change Log

Version (Date)	Summary of Changes Made
Version 1.0 (March 5, 2025)	Master Action Plan
Version 2.0 (August 22, 2025)	Action Plan Amendment 1



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 American Relief 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 and 8 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 hardest-hit 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.

Responsible Entity

The Louisiana Division of Administration, Office of Community Development – Disaster Recovery is the Responsible Entity assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

Per 24 CFR 58.4(b)(2), the Louisiana Division of Administration, Office of Community Development – Disaster Recovery exercises HUD's responsibilities in accordance with 24 CFR 58.18 with respect to approval of a unit of local government's environmental certification and RROF for a HUD assisted project funded through the state.



FEMA-4817-DR, Louisiana Disaster Declaration as of 11/07/2024

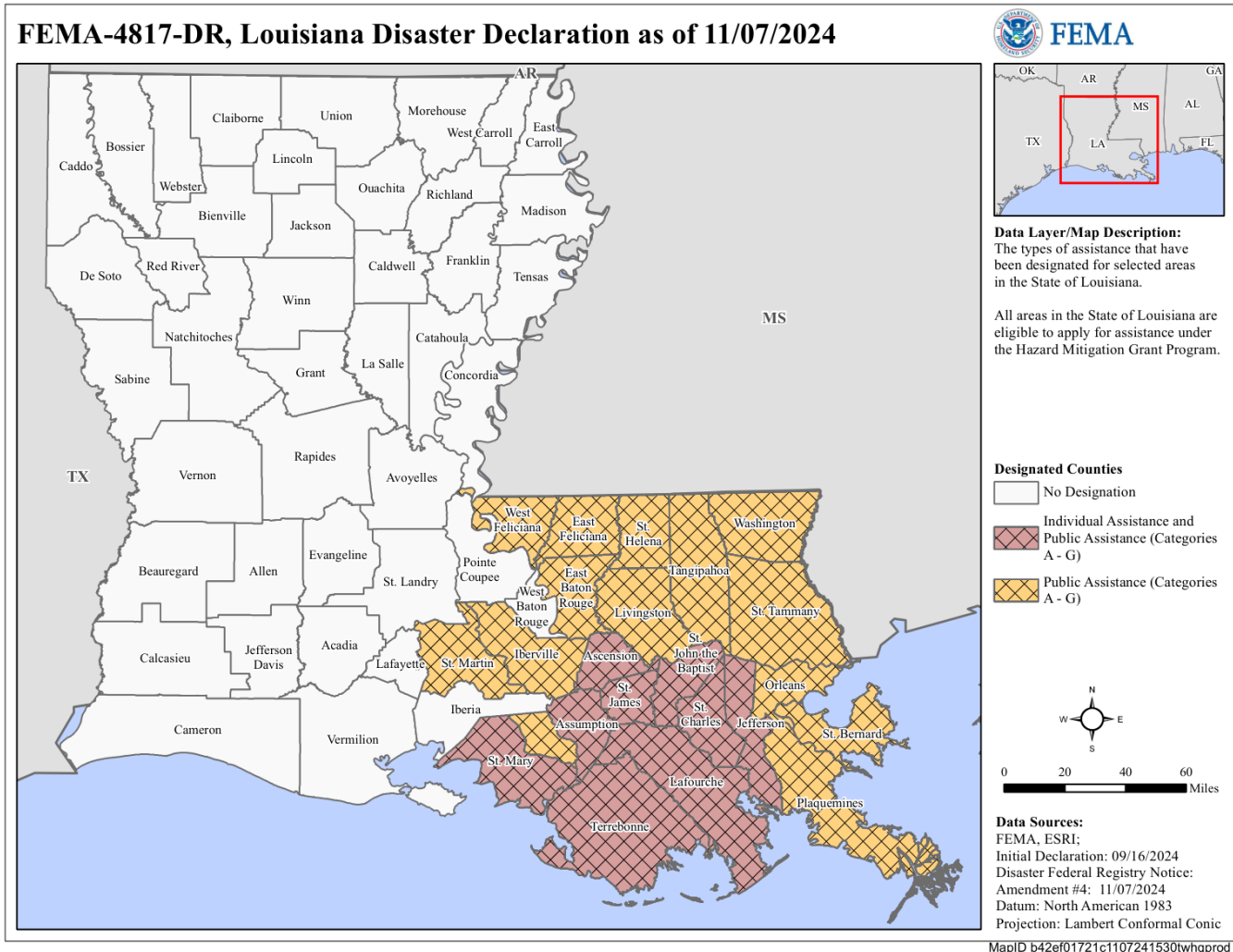


Figure 1: Map of FEMA-4817-DR, Louisiana Disaster Declaration as of 11/07/2024

Most Impacted and Distressed Areas

HUD identified MID Areas

HUD requires CDBG-DR funds to be used to address unmet needs in the Most 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.



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 and Mitigation Needs 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 impediments 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 Parishes

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 has attempted to isolate owner-occupied households with evidence of flooding damage apart from those with no evidence of flooding damage. For the purposes of this analysis, in the absence of evidence of flood damage, units are assumed to be impacted exclusively by wind. As such, for owner-occupied homes that sustained either wind or flood damage, nearly half of homeowners reported lacking a standard hazard insurance policy that would otherwise be expected to offset documented losses.



Table 6: Homeowners without Insurance Damage by Damage Type

Damage Type	Owner-Occupied Homes with Real Property Damage	Percent W/O Insurance
Wind Damage Only	18,303	47%
Flood Damage	1,556	47%
Total	19,859	

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: 47 percent
- Flood impacted homeowners without insurance: 47 percent

The state replicated HUD's analysis of homeowner need by applying the FEMA-SBA multiplier to the FEMA-verified 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 impediments 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

CoC Name: Louisiana Balance of State CoC



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

CoC Name: Lafayette/Acadiana Regional CoC

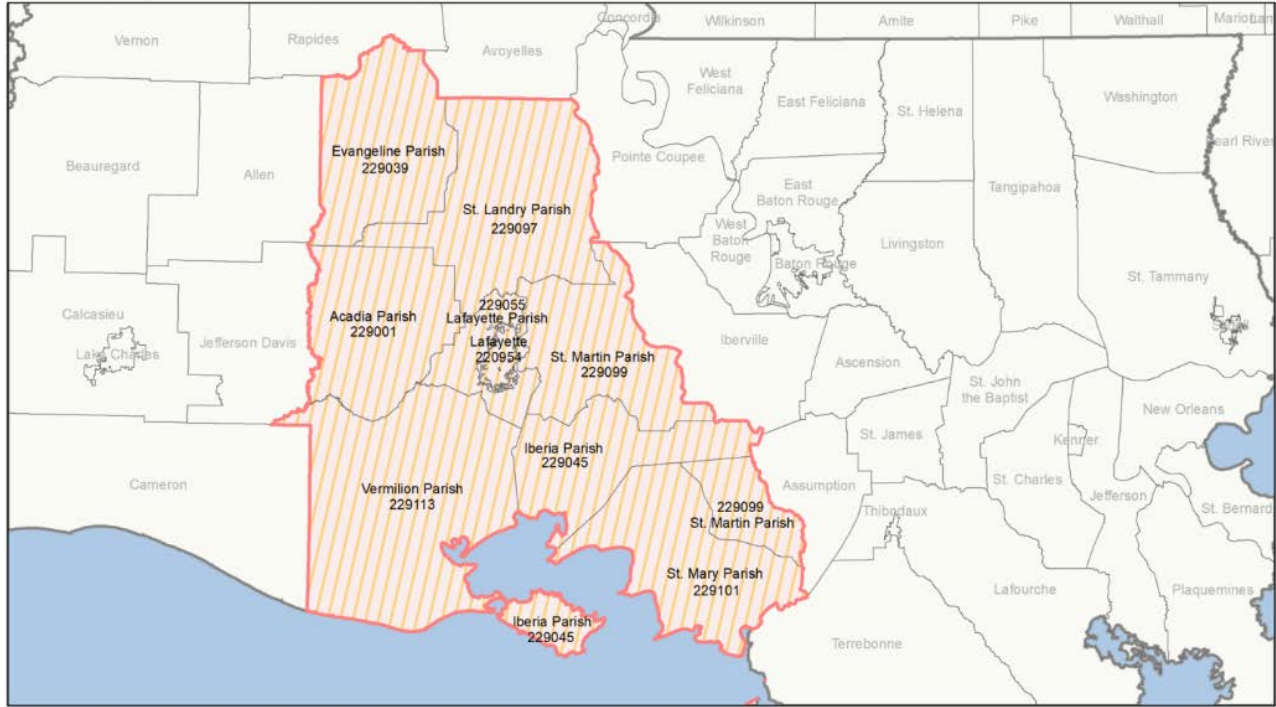


Figure 4: Lafayette/Acadiana CoC (LA-500) – Parishes participating in Homeless Assistance Programs.



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

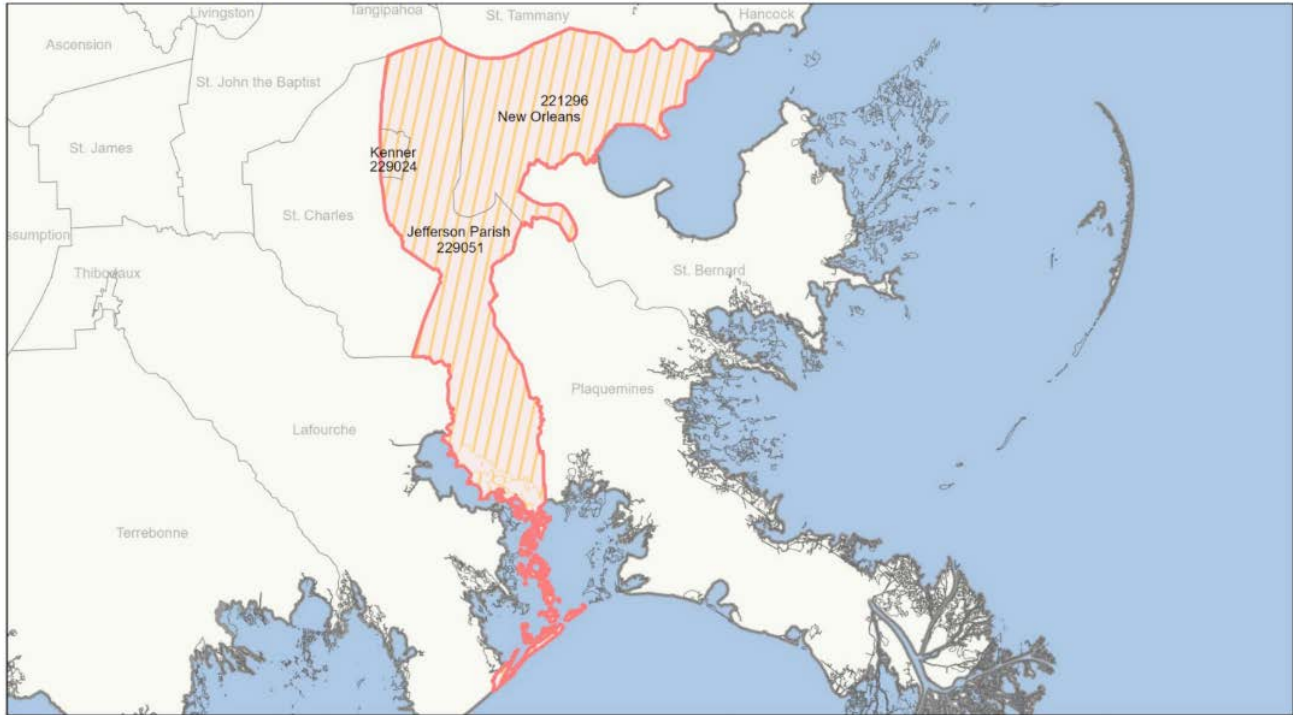


Figure 5: New Orleans/Jefferson Parish CoC (LA-503) – Areas participating in Homeless Assistance Programs

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

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



**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 Impacted by 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	0	0
Assumption	111	0	32	0	0	0
Jefferson	4,911	0	2,118	0	0	0
Lafourche	275	0	413	0	276	0
St. Charles	129	0	72	0	377	0
St. James	17	0	257	0	252	0
St. John the Baptist	102	0	75	0	0	0
St. Mary	204	0	114	0	0	0
Terrebonne	528	0	517	0	0	0
Total	6,365	0	3,922	0	905	0

Source: Louisiana Housing Corporation

According to the Louisiana Housing Corporation, no public housing units were impacted by the disaster.

Infrastructure Unmet Needs

Since 2000, there have been 35 major disaster declarations in the state of Louisiana. 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 forward-looking investment in the restoration of critical infrastructure. This restoration requires improvements in energy efficiency, modernized IT infrastructure in public facilities, and enhanced mitigation measures to prevent damage from future disasters. These local parishes and municipalities also need support for water management projects, hardening of transportation corridors, and other flood-prevention improvements that enhance 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.

Table 13: FEMA Public Assistance Program

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

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.

- 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.

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



- 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 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.

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



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.”



Table 16: Agricultural Losses Attributable to Hurricane Francine

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, [https://www.fema.gov/disaster/declarations 2025.01.29](https://www.fema.gov/disaster/declarations%202025.01.29), 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.

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

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%

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). <https://www.ncei.noaa.gov/access/billions/>

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



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

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

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 benefits the entire 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.

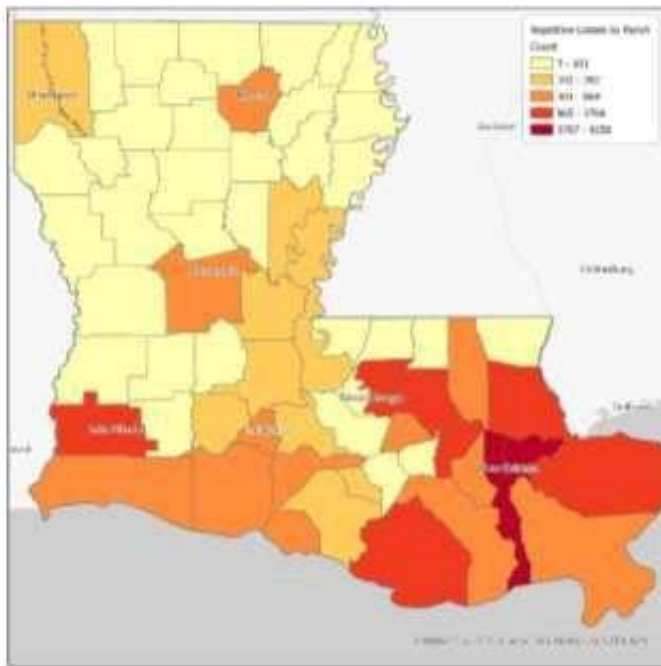


Figure 6: Distribution of RL/SRL structures across the state.

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, <https://www.fema.gov/openfema-data-page/nfip-multiple-loss-properties-v1>, 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.

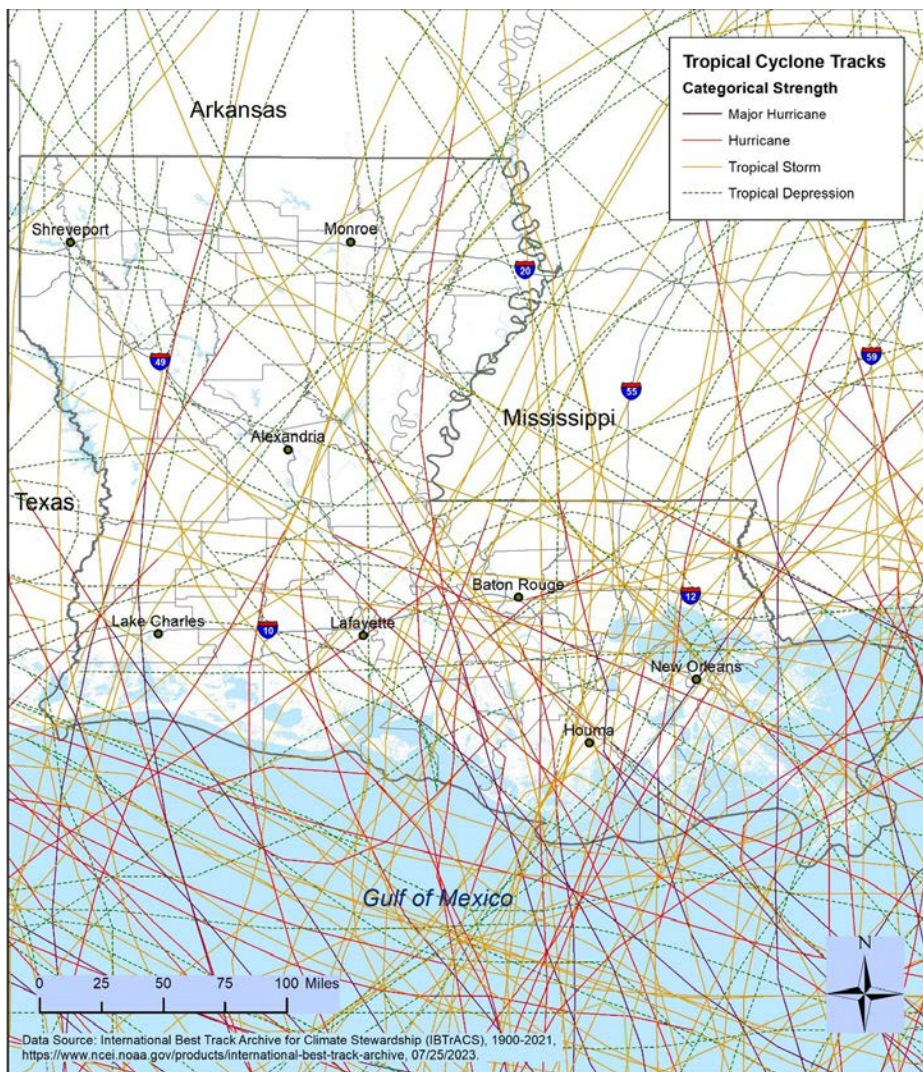


Figure 7: Tropical Cyclone Tracks Across Louisiana (1900-2021). Source: NOAA, Historical Hurricane Tracks, <https://coast.noaa.gov/hurricanes/>

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. <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>

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

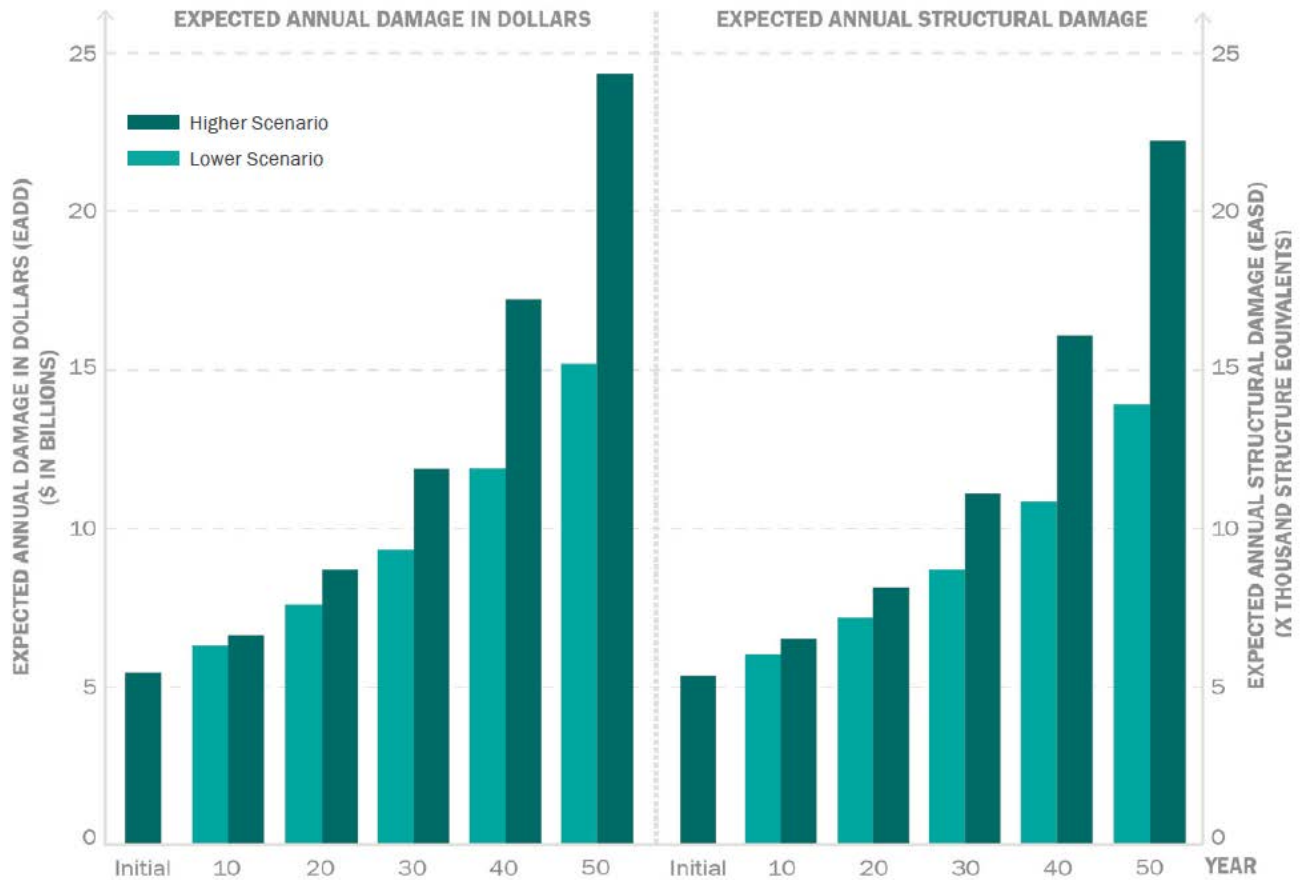


Figure 8: Expected Annual Damage in Dollars (EADD) and Expected Annual Structural Damage (EASD), Over 50 Years, Future Without Action, Higher and Lower Scenario. Source: <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>

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.

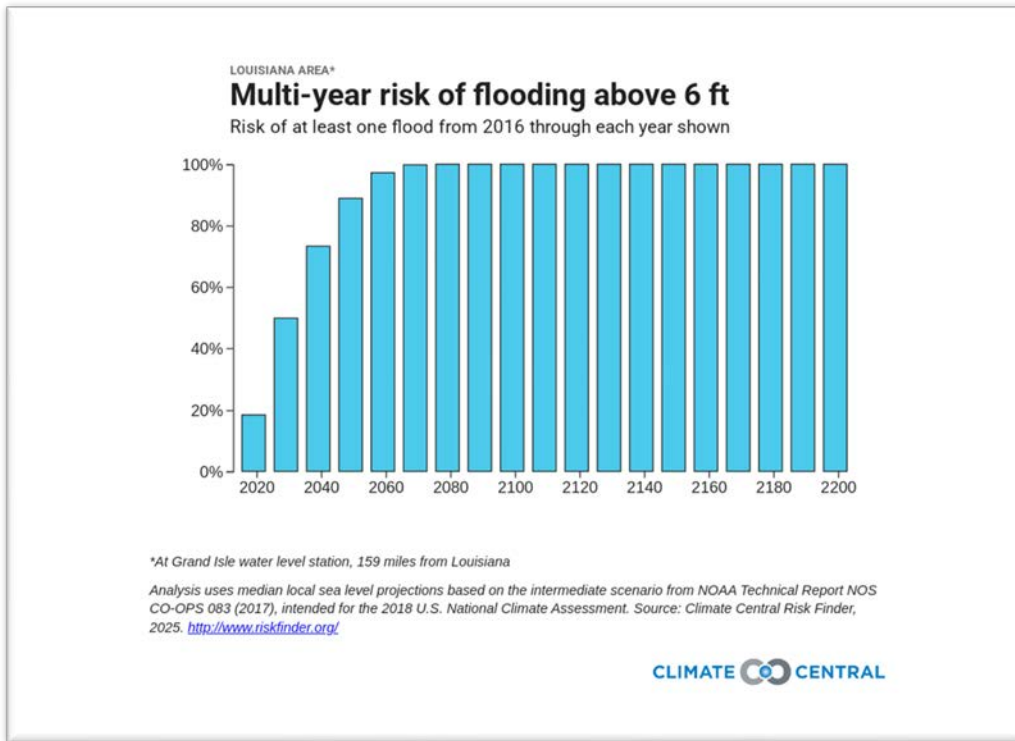


Figure 9: Louisiana multi-year risk of flooding above 6 ft. Climate Central, Surging Seas Risk Finder, January 2025. Source: www.riskfinder.org.

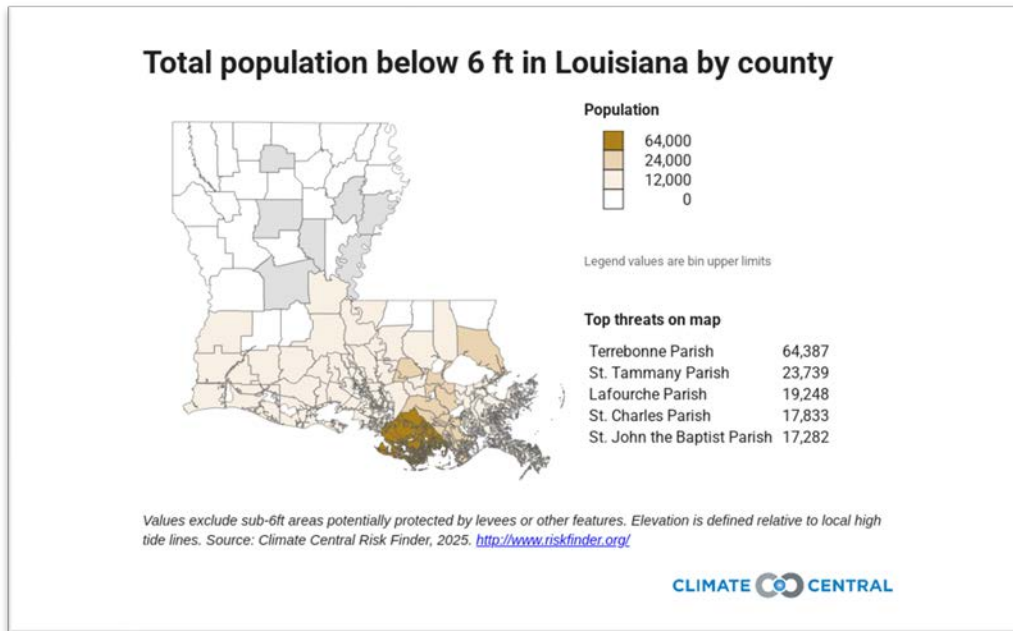


Figure 10: Total population below 6ft. by parish - Climate Central, Surging Seas Risk Finder, January 2025. Source: www.riskfinder.org.

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. <https://southcentralclimate.org/wp-content/uploads/2019/08/LA-screen-hi.pdf>



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.

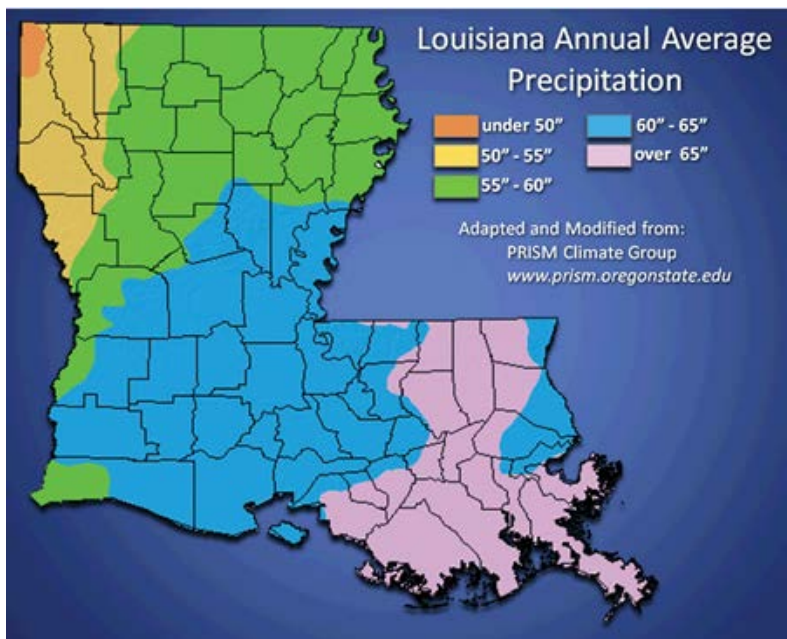


Figure 11: Louisiana Average Annual Rainfall Distribution. PRISM Climate Group, www.Prism.oregonstate.edu, January 2025.

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>



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.

Table 22: 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%



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 HUD-identified “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.

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.

To ensure the needs of displaced persons with disabilities are met, LOCD-DR will incorporate accessibility considerations into its relocation policies and procedures. This includes identifying accessible temporary and permanent housing options, providing reasonable accommodations during the relocation process, and coordinating with relevant agencies and advocacy organizations to support individuals with disabilities in accordance with applicable federal accessibility standards.

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.



Table 23: Grantee Administration Activity(ies) Overview

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

Planning

The state allocates \$2,000,000 of the total CDBG-DR award for planning 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 24: 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 allocations.

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 25: 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 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 sub-grantees will provide assistance to eligible homeowners through one of four program tracks, which homeowners will choose at the time of application:

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

Connection to Unmet Needs Assessment

This program is only available to applicants who sustained damage to their home as a result of Hurricane Francine or applicants with a remaining unmet need from the 2021 disasters (only within the parishes identified below as eligible geographic areas) and are determined eligible for the program. All eligible parishes for the Hurricane Francine allocation overlap with most-impacted and distressed parishes from Hurricane Ida (2021 disaster). Utilizing HUD guidance for interchangeability of grant funds allows the State to work towards ensuring all applicants within these parishes are assisted. 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 2,000 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.. Additionally, the Program, through specific targeted outreach events, will attempt to reach disaster-impacted populations with information and available resources regarding the Program.

The criteria of this phased approach is specifically designed to meet the needs of disaster-impacted 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:





Based on current funding limitations and federal guidance, to be placed in a phase, you must:

- (1) have owned and still own the damaged home
- (2) have occupied the home at the time of the disaster
- (3) have sustained major/severe damage (per FEMA)
- (4) NOT have received or expect to receive structural insurance payments greater than \$25k
- (5) be below the 300% AMI Income cap

APPLICATION PHASES		PHASE I	PHASE II	PHASE III	PHASE IV	PHASE V	PHASE VI
HOUSEHOLD INCOME	LESS THAN 50% AMI	✓					
	BETWEEN 50% & 80% AMI		✓	✓			
	BETWEEN 80% & 300% AMI				✓	✓	✓
GEOGRAPHY	MOST IMPACTED	N/A	N/A	N/A	✓		N/A
	OTHER IMPACTED					✓	
HOMEOWNER 62+ AND/OR HOUSEHOLD MEMBER WITH DISABILITY	YES	N/A	✓		N/A	N/A	N/A
	NO			✓			
STATUS OF REPAIRS	COMPLETE	N/A	N/A	N/A			✓
	INCOMPLETE				✓	✓	

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 sets a cap on income for households earning up to 300% of AMI. 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., 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 Impediments for Assistance: The State of Louisiana is committed to ensuring access to disaster recovery assistance for all disaster-impacted individuals. To identify impediments, 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 assessment of this Action Plan to help identify areas that may require additional engagement. 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 impediments 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 disaster-impacted communities, 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 disaster-impacted 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 disaster-impacted populations as well as persons displaced by the disaster event in need of affordable housing.

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 may be considered on a case by case basis when there are exigent circumstances (as funding allows) 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 be 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 RLHP, 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 Impediments for Assistance: As a complementary program to RLHP, the methods for reducing impediments 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 disaster-impacted populations, 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 Impediments 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 impediments 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 26: 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%

Connection to Mitigation Needs Assessment

Restore Homeowner Program

All residential buildings undergoing reconstruction or substantial improvement funded through the Restore Homeowner Program will 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. Finally, Solution 4 of RLHP offers voluntary buyouts to support the mitigation of repeated flood risk.

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.



All residential buildings undergoing reconstruction or substantial improvement funded through RLHP will be completed using high quality, durable and energy efficient construction methods. Future property damage will be minimized by incorporating resiliency features by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations. Additionally, 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 impediments 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 co-chairs 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 assess 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 disaster-impacted 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 impediments 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.

Table 27: Consultations During Action Plan Development

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	<p>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.</p> <p>GOHSEP collaborated with the FEMA Interagency Recovery Coordination (IRC) Team to assess damage and mobilize recovery efforts in affected parishes.</p> <p>The U.S. Army Corps of Engineers (USACE) focused on infrastructure planning and mitigation, including the PAS program.</p> <p>The U.S. Department of Agriculture (USDA) provided support for agricultural recovery and economic development.</p> <p>The Economic Development Administration (EDA) worked on economic recovery strategies and resource allocation.</p> <p>The Environmental Protection Agency (EPA) implemented risk mitigation and environmental resilience initiatives.</p> <p>GOHSEP shared post-disaster damage assessments under FEMA’s Public Assistance and Individual Assistance programs to aid in the analysis of unmet needs.</p> <p>The Crisis Counseling Program (CCP) used standardized data collection tools from FEMA, GOHSEP, and SAMHSA to assess high-risk populations.</p> <p>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.</p>
Local/State	Engagements with state and local governments, including Terrebonne Consolidated



<p>Government</p>	<p>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.</p> <p>GOHSEP and LOCD-DR coordinated with local parish governments on damage assessments and unmet needs evaluations.</p> <p>LOCD-DR offers ongoing technical assistance to local governments.</p> <p>Terrebonne Consolidated Government is addressing recovery challenges, including housing shortages and infrastructure repairs.</p> <p>Terrebonne Levee District focuses on FEMA Public Assistance (PA) projects, funding burdens, and infrastructure improvements.</p> <p>Ascension Parish Emergency Management coordinates efforts related to infrastructure damage, funding gaps, and unmet recovery needs.</p> <p>The Louisiana Housing Corporation (LHC) conducted pre- and post-storm outreach to over 1,500 properties to assess housing damage and availability.</p> <p>LOCD-DR conducted before-and-after storm notifications to contractors and homeowners under the Restore program.</p> <p>LED published “The Economic Impact of Hurricane Francine” to inform decision-making at state and local levels.</p> <p>CPRA engaged local communities for post-storm damage assessments and operational successes.</p>
<p>Indian Tribes</p>	<p>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.</p>
<p>Nongovernmental organizations</p>	<p>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.</p> <p>RSF3 worked alongside nonprofit agencies to evaluate the impacts on housing, behavioral health, food insecurity, and economic challenges.</p> <p>The Louisiana Spirit Crisis Counseling Service offered mental health services at Disaster Recovery Centers.</p> <p>Additionally, Psychological First Aid (PFA) training was provided for 109 individuals.</p>



<p>Private sector</p>	<p>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.</p> <p>RSF2’s report evaluated the economic impact of Hurricane Francine, highlighting disruptions to businesses and the workforce.</p> <p>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.</p> <p>LED’s Community Competitiveness Initiative monitored how well private sector businesses adhered to emergency preparedness guidelines.</p>
<p>State and local emergency management agencies that have primary responsibility for the administration of FEMA funds</p>	<p>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.</p> <p>GOHSEP coordinated damage assessments and financial projections for FEMA funding applications.</p> <p>GOHSEP structured a state-level funding threshold for smaller disasters that do not meet FEMA declaration requirements.</p> <p>GOHSEP led validation of 4,300+ virtual damage assessments to support Individual Assistance requests.</p>
<p>Agencies that manage local Continuum of Care</p>	<p>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.</p> <p>RSF3 worked with health and human service agencies to assess behavioral health needs and food insecurity.</p> <p>Crisis Counseling Program (CCP) engaged local agencies to deliver services in impacted areas.</p>
<p>Public Housing Agencies</p>	<p>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</p>



	<p>housing stability for affected communities.</p> <p>The Louisiana Housing Corporation (LHC) conducted damage assessments of affordable housing units and evaluated construction delays post-Francine.</p>
HUD-approved housing counseling agencies	<p>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.</p>
State Housing Finance Agencies	<p>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.</p>
Other Stakeholders	<p>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.</p> <p>The Terrebonne Basin Barrier Island Survey evaluated the effects on coastal protection infrastructure.</p> <p>The CPRA gathered data on floodgate and levee impacts to guide future mitigation planning.</p> <p>GOHSEP is working to enhance emergency management training programs in Louisiana.</p> <p>LOCD-DR will maintain its leadership role in COSCDA to advocate for improvements in disaster recovery policies.</p>

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 <https://www.doa.la.gov/doa/ocd/>. 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 HUD-identified MIDs to solicit citizen comments. The public hearing dates are scheduled as listed below:

Table 28: 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 impediments for disaster-impacted individuals. 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 impediments 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.

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. Citizens may also submit fair housing complaints directly to HUD through www.hud.gov/fairhousing/fileacomplaint.

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/oed/> 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/oed/> 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 a summary of 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 cross-referencing 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 A

Certifications

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

- a. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan—LOCD-DR certifies that it:
 - 1) 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.
- b. 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.
- c. Consistency with the Action Plan—LOCD-DR certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d. 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).
- e. 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.
- f. Use of Funds—LOCD-DR certifies that it is complying with each of the following criteria:
 - 1) 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).
- g. **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.
 - h. **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.



Appendix B

Public Comments

General Information

Topic: Event Logistics

Summary of Comments: Commenters asked for dates, times and locations of public hearings and program milestones.

LOCD-DR Response: LOCD-DR hosted two public meetings. The first was held March 18th and the second public meeting was held on March 24. More information regarding survey launch and additional program information is posted at restore.la.gov. We also have social media channels for LOCD-DR and Restore Louisiana, and announcements are posted there.

Topic: Continued HUD Funding

Summary of Comments: Commenters ask if the current federal administration might cut HUD funding.

LOCD-DR Response: We do not believe that to be the case. All indications are that the congressional appropriation from last year and HUD's allocation to our state are moving forward.

City/Parish Related

Topic: City Park

Summary of Comments: The City of Thibodaux identifies a need to seek funds to recover from the devastating effects of Hurricane Francine such as a multipurpose park to serve as a debris management site, community town hall, storm staging area, and food distribution center.

LOCD-DR RESPONSE: The current projection of costs associated with the Restore Louisiana Homeowner program and current funding availability is insufficient to support infrastructure projects. The Action Plan Unmet Needs Assessment identifies infrastructure and if future funding becomes available, additional programing can be considered through a substantial amendment. In addition, LOCD-DR referred the commenter to GOHSEP.



Topic: Parish Drainage

Summary of Comments: Resident seeks Francine funding for drainage projects.

LOCD-DR Response: The current projection of costs associated with the Restore Louisiana Homeowner program and current funding availability is insufficient to support infrastructure projects. The Action Plan Unmet Needs Assessment identifies infrastructure and if future funding becomes available, additional programming can be considered through a substantial amendment.

Topic: Home Elevation

Summary of Comments: Commenters ask about home elevations and other parish assistance.

LOCD-DR Response: Please reach out to your parish to inquire if they offer an elevation program. They typically receive limited funding from FEMA or through the Hazard Mitigation Grant Program (HMGP) on a yearly basis, but they do have lists to help homeowners. The Restore Louisiana program does cover elevations as part of a reconstruction according to the local jurisdiction's elevation requirements. Restore Louisiana is not an elevation program. However, if the parish requires a home to be elevated to obtain permitting and repair work, that project changes from a repair or rehabilitation to a Solution 1 reconstruction. In that case, the program builds a new elevated home that meets the requirements of the local jurisdiction. We do replacements for most of our manufactured housing units (MHUs). If required by the parish, Restore will elevate them. For more assistance, please visit restore.la.gov.

Eligibility (Restore)

Topic: Potential Eligibility Scenarios

Summary of Comments: Commenters provide scenarios and ask for eligibility determination.

LOCD-DR Response: Individual scenarios involving damages, ownership, etc. are dependent upon the situation. If received, please fill out the survey and receive more information as we go forward.

Topic: Homes on Wheels

Summary of Comments: Commenters ask if recreational vehicles (RVs) and mobile homes are eligible.

LOCD-DR Response: RVs are not eligible for Restore. However, mobile home owners who meet FEMA eligibility requirements will receive an invitation to complete the survey. Current best practices in disaster recovery indicate that replacement rather than repair of manufactured housing units is typically more cost-effective and



provides better long-term housing solutions. Restore sends out damage estimators that inspect the unit to determine what is best and feasible. Our goal is to help homeowners get into a more stable and suitable structure, so we do offer replacements for MHUs.

Topic: Home Titles

Summary of Comments: Commenters ask if they still qualify without a home title.

LOCD-DR Response: There are multiple ways to determine ownership. A case manager will follow up if there is any additional documentation needed to ensure you can substantiate your ownership and occupancy of the structure. It is dependent upon your individual situation, so if contacted, please fill out the survey.

General (Restore)

Topic: Program Overview

Summary of Comments: Commenters requested a program overview.

LOCD-DR Response: Because of the limited amount of allocated funds, the state will focus efforts on repairing and reconstructing damaged homes at this time. Under the Restore Louisiana program for Hurricanes Laura, Delta and Ida and the May 2021 Severe Storms in the past, the state offered an additional buyout solution—Solution 4—for homeowners that did have qualifying damages and are in a floodway, which prohibits us from repairing their home. At this time, we are not aware of any potentially eligible structures that would qualify for Solution 4. The state intends to help as many homeowners as possible who are potentially eligible, meaning their FEMA claim is classified as major/severe. There are three scenarios FEMA considers major and severe damage: FEMA determined \$8,000 of verified losses or above; FEMA determined \$3,500 in damage to personal property; FEMA determined at least one foot of flooding on the first floor. The Louisiana Office of Community Development – Disaster Recovery will contact potentially eligible homeowners directly to get them signed up.

Topic: Past Restore Program Funding Amounts

Summary of Comments: Commenters ask how much funding was available in past Restore programs.

LOCD-DR Response: That information is in detail on the Division of Administration – Louisiana Office of Community Development – Disaster Recovery website at <https://www.doa.la.gov/doa/ocd/> and on our Restore Louisiana website. Weekly reports specific to past Restore Louisiana Homeowner programs are available here: <https://cdn2.assets-servd.host/utopian-bustard/production/Restore-2020-Pipeline-121.pdf?dm=1742234791>.



Topic: Restore Program Kick-off

Summary of Comments: Commenters ask when the program will begin.

LOCD-DR Response: The program officially opens when we have an approved Action Plan from HUD and an executed grant agreement that allows us to access the federal funds. We anticipate submitting this Action Plan soon and HUD has 45 days to respond. The earliest launch date would be in May.

Topic: Survey

Summary of Comments: Commenters request information on the survey.

OCD-DR Response: We would encourage you to go online, fill out the survey, provide information and if a FEMA appeal is pending, contact us once you have some type of resolution to the appeal. The survey is not available right now. We will make an announcement when the survey is open, but communication will primarily be via direct calling or texting, using contact information from FEMA. If you got an individual assistance claim from FEMA, and FEMA determined verified losses after doing an inspection, Restore will contact you when the survey is open. All individuals with FEMA major/severe damage from Hurricane Francine will receive notification from the program when the survey is open. The state is anticipating launching the survey in the next month and will be contacting homeowners directly who were deemed major/severe by FEMA. Louisiana has these disasters all too often, and we want to be more proactive. The survey will originate from the Restore LA Homeowner Program and/or the Louisiana Office of Community Development - Disaster Recovery.

Program Operations (Restore)

Topic: Disaster Case Management

Summary of Comments: Commenters ask if the state will be contracting with nonprofits to provide Disaster Case Management Program (DCMP) for Hurricane Francine. Other commenters were aware that DCMP has not been made available by FEMA and asked how will the program deal with survivors with high needs and difficulty navigating the process?

LOCD-DR Response: The Federal Emergency Management Agency (FEMA) funded Disaster Case Management Program (DCMP) is typically a function of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP). To date, FEMA funding has not been provided for Hurricane Francine survivors. However, LOCD-DR will provide program-specific case management for eligible Restore Louisiana applicants once the action plan is approved by HUD. Program specific case managers can walk homeowners through the



process and help them go online, help them fill out their application and answer questions, offering support to individuals that are participating in the Restore Louisiana program.

Topic: Program Efficiency

Summary of Comments: Commenter said her experience with the Restore program during Hurricane Ida was aggravating and she hopes the Francine process will be smoother.

LOCD-DR Response: We appreciate your comment and continually review and revise processes to improve efficiency.

Topic: Buyouts

Summary of Comments: Commenters ask if there is a buyout option for frequent flooding.

LOCD-DR Response: The Action Plan lists voluntary buyouts (Solution 4) as an eligible program track. At this time, we are not aware of any potentially eligible structures that would qualify for Solution 4. The Louisiana Office of Community Development – Disaster Recovery will contact potentially eligible homeowners directly to get them signed up.

Topic: Contractor Estimate

Summary of Comments: Commenters ask if FEMA already has a contractor estimate, do we have to do another one?

LOCD-DR Response: Yes. What the state receives from FEMA is high-level and does not include all damage. For LOCD-DR to determine the cost of home repairs, we have to complete a detailed damage estimate. This estimate drives the calculation of grant amounts.

Topic: Vendors

Summary of Comments: Commenters ask if a list of vendors is available.

LOCD-DR Response: All vendor contracts are listed on our website at <https://www.doa.la.gov/doa/ocd/contracts-and-public-notices/>.

Topic: Vouchers

Summary of Comments: Commenters ask if vouchers are available.



LOCD-DR Response: The program provides interim housing assistance specifically for Solution 1 homeowners in the low-to-moderate income category, particularly in cases where reconstruction necessitates extended displacement from their primary residence. Under this assistance program, eligible homeowners are responsible for securing appropriate rental accommodations and executing lease agreements independently. The Restore Louisiana program then processes reimbursements for these temporary housing expenses in accordance with program guidelines and established eligibility criteria.

Topic: Lowering Restore Major/Severe Damages Threshold

Summary of Comments: Commenters ask if Restore will lower the major/severe damage amount (\$8,000 of verified losses or above/\$3,500 in damage to personal property) to allow more individuals to qualify, as it has in the past.

LOCD-DR Response: In other disasters where we received sufficient funding, we initially opened the Restore Louisiana program to homeowners that were major/severe, as designated by FEMA. Then, as we were able to better gauge program participation, we determined there was enough funding available to lower the qualifications. We went down to a threshold \$3,500 of verified losses from FEMA. To clarify, right now, we are currently assisting folks impacted by Hurricane Ida who are below \$8,000 in major/severe damages as determined by FEMA for this reason. At this time, based on the allocation and FEMA numbers of major/severe homeowners, we do not believe that we would have additional funding to open the program up to those with less than major/severe damage. We will be reassessing this as we go forward. The major/severe population is the focus and the main population HUD funding is based on. If we have additional funding, we may reduce the amount of damage required and open the survey for additional folks.

Topic: Home Replacement

Summary of Comments: Commenters ask about home replacement.

LOCD-DR Response: The level of construction assistance—whether it’s rehabilitation, reconstruction of stick-built homes, or repair/replacement of manufactured housing units (MHUs)—is determined by the program in coordination with the applicant’s local jurisdiction. If the local jurisdiction determines that a home must be reconstructed due to the level of damage, the program will follow that requirement. We also encourage all impacted homeowners to maintain documentation such as records, receipts, invoices, and photos related to any repairs, construction, or cleanup work completed at the damaged property.

Topic: Roof Fortification

Summary of Comments: Commenters ask if Restore will fund roof fortification.



LOCD-DR Response: Solutions 1 and 2 are eligible for FORTIFIED roofs based on the damage assessment. Rehabilitation projects that require a roof replacement can be eligible for the FORTIFIED Gold roof as well. If you are in the Restore Louisiana program and your home must be reconstructed because of the level of damage it received, when we rebuild your home, we will have a FORTIFIED Gold certification for your home. If you have roof damage without homeowners' insurance, it would be constructed to a FORTIFIED standard. However, it does require multiple inspections and a certification, so is dependent on the structure.

Topic: Switching Categories After Award

Summary of Comments: If a homeowner selects Solution 2 and finds out they lack the capacity to manage a construction project or cannot find any vendors, can they ask for Solution 1 instead?

LOCD-DR Response: Typically, if a homeowner opts for Solution 2, the program requests the homeowner to demonstrate that they have a contract with a licensed contractor before they close on their award. We do that for a couple of reasons. We want to make sure the contractor is licensed and insured with the state. If not, Restore will switch you to Solution 1 prior to closing on your award. Solution 1 means Restore will assign a program-managed contractor to complete your repair or reconstruction.

FEMA

Topic: FEMA Deadlines

Summary of Comments: Commenters ask about FEMA application deadline.

LOCD-DR Response: The information we received from FEMA is they have closed new claims, but if you have an exceptional situation or want to appeal, they will review your individual assistance claim on a case-by-case basis. For example, if you were hospitalized or involuntarily out of communication, ask FEMA to revisit your claim.

Topic: FEMA Personal Information

Summary of Comments: Commenters ask how Restore obtains their information from FEMA.

LOCD-DR Response: The state has data sharing agreements in place with FEMA, allowing us to receive certain information to determine how many folks have experienced damage and need assistance. The data is very high-level, essentially only the information submitted with your individual assistance claim. It is protected information. FEMA prohibits LOCD-DR from sharing this information. It allows us to assess damages and determine how to administer HUD funding.



Topic: FEMA Major/Severe Damage

Summary of Comments: Will the program contact me if I received \$1,000 or more from FEMA and repair work has started?

LOCD-DR Response: There are three scenarios FEMA considers major and severe damage: FEMA determined \$8,000 of verified losses or above; FEMA determined \$3,500 in damage to personal property; FEMA determined at least one foot of flooding on the first floor. Restore will reach out to homeowners meeting these criteria with a survey invitation. In terms of if the work has started, that is not a requirement for our program.

Topic: FEMA Appeals

Summary of Comments: Commenters ask if a pending appeal with FEMA still makes them eligible for program.

LOCD-DR Response: Yes, assuming you have FEMA verified losses of \$8,000 and above and you meet the other eligibility requirements. Anyone that wins a FEMA appeal and has major/severe damages will automatically be able to complete the survey and go through the application process with Restore. Homeowners who want to appeal their FEMA determination are encouraged to contact FEMA by calling 1-800-621-3362 or visiting FEMA's website.

Southeast Louisiana Legal Services Not Addressed Above

Topic: Southeast Louisiana Legal Services Comments

Summary of Comments:

1. Lack of awareness of Phased Approach causes many to not complete survey. Restore should advertise, educate and prepare survivors for Phased Approach.
2. Technical and information barriers prevent full access to program. Restore should provide paper-and-phone options with how-to documents written in plain language and posted on social media.
3. Solution 2 homeowners should receive the same protections as Solution 1, because disputes, fraud and shoddy workmanship plague Solution 2 homeowners. Also, target advertising to combat contractor fraud and lock in MHU prices.
4. Expand the Voluntary Buyout and MHU to Stick Built Options to assist survivors with Elevation Concerns.



5. The Interim Housing Assistance Program should be provided to more survivors and allow more survivors to stay within their community. Create a family-member rental option and provide interim housing assistance for MHU recipients.

LOCD-DR Response: The Restore Louisiana Homeowner Program recognizes the importance of protecting homeowners throughout the recovery process. Our Solution 2 homeowner-managed construction provides applicants with the option to repair their homes on a flexible schedule that best fits their individual recovery needs, as every applicant's situation is different. This option remains in high demand, with approximately 60 percent of Restore Program applicants selecting Solution 2. Applicants receive protection in accordance with Louisiana's Contractors Licensing Law (LA R.S. Title 37). The State conducts inspections on all Solution 2 work performed before disbursing CDBG-DR funds. These inspections verify that the work completed aligns with the approved scope and meets program standards.

The State currently follows HUD's requirements for all structures that receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(12), must be elevated with the lowest floor, including the basement, at least two feet above the one percent annual chance floodplain elevation (base flood elevation). The State currently allows an applicant who chooses to replace their damaged MHU with a new stick-built single family home on the same site as their damaged manufactured home or purchase an existing structure outside of a Special Flood Hazard Area (SFHA).

Additionally, HUD defines the term "buyouts" to mean the acquisition of properties located in a floodway, floodplain, or other Disaster Risk Reduction Area that is intended to reduce risk from future hazards. The key factor in determining whether the acquisition is a buyout is whether the intent of the purchase is to reduce risk of property damage from future flooding or other hazards in a floodway, floodplain, or a Disaster Risk Reduction Area. As such, buyouts cannot be utilized to circumvent the elevation requirements in Special Flood Hazard Areas. The state will continue to adhere to the advanced elevation requirements established in section II.B.2.c of the Federal Register Notices (FR-6303-N-01; FR-6326-N-01; FR-6368-N-01).

Under the Restore Louisiana program for Hurricanes Laura, Delta and Ida and the May 2021 Severe Storms, the State expanded its Interim Housing Assistance (IHA) Program by increasing the amount of funding made available to this program. Initially, \$1 Million dollars was allocated to interim housing assistance and approved in our action plan by HUD. In working with our applicants to address their needs, the State has increased the total IHA budget to \$32.5 Million. This will allow the State to provide interim housing assistance to the current pool of qualified applicants who have requested assistance.



Terrebonne Parish Comments Not Addressed Above

Topic: National Flood Insurance Program (NFIP)

Summary of Comments:

1. Restore should mirror National Flood Insurance Program requirements.
2. Restore should transition repair projects into reconstruction if damages exceed 60 percent of home value.
3. Restore should share Solution 1 and 2 Special Flood Hazard Area participants with parish permitting office.
4. Mobile homes should be replaced with Fortified Gold homes.
5. Use attached spreadsheet for cost reasonableness comparisons between parish-implemented and Restore-implemented reconstructions.

LOCD-DR Response: Thank you for your comment and recommendations. These recommendations will be considered during program design and policy discussions. Any revisions to current Restore Louisiana Homeowner policies will be posted to the Restore website at www.restore.la.gov.