

Jefferson Parish, Louisiana
Community Development Block Grant
Disaster Recovery
Hurricane Isaac Action Plan

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Executive Summary

On May 29, 2013, HUD issued FR -5696-N-03, notifying Jefferson Parish, Louisiana of an allocation of \$16,453,000.00 from the Disaster Relief Appropriations Act of 2013. Jefferson Parish will use this funding to address the outstanding needs that resulted from Hurricane Isaac, which struck Louisiana in August of 2012. Jefferson Parish Community Development Department (JPCD) will implement the programs outlined in this Action Plan. Jefferson Parish is committed to leveraging this funding to the greatest extent possible to serve the greatest population possible, with a particular focus on the historically underserved populations of the elderly and the disabled.

Jefferson Parish has participated with the State of Louisiana in identifying the unmet need of the Parish in accordance with the methodology outlined in FR -5696-N-01. The unmet need for Jefferson Parish is outlined in Figure 1.1.

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Jefferson	\$ 224,832,905.36	\$ (9,040,576.47)	\$ (5,301,004.11)	\$ (19,044,321.56)	\$ (26,705,200.00)	\$ 164,741,803.21

Based on the assessment of need, Jefferson Parish proposes to distribute the direct allocation according to Figure 1.2.

Programs			
	HAP	ESP	EPO Infrastructure
Activity	\$8,653,190	\$2,250,000	\$4,727,162
Administration	\$ 455,431	\$118,421	\$248,798
Total	\$ 9,108,621	\$2,368,421	\$ 4,975,960

The Parish will focus its funding through three programs. First, in response to the overwhelming unmet need identified in the Parish, the majority of Program funding will be spent on low to moderate income homeowners who are either elderly or disabled. Because Jefferson Parish sustained substantial damage that was spread broadly throughout the community, the Homeowner Assistance Program (HAP) will focus on smaller repair funding.

Second, the Parish will engage in an Elevation Support Program (ESP) to assist homeowners who are interested in raising their homes to mitigate against future disasters. These funds may be used as match for the Hazard Mitigation Grant Program that is currently available for flood elevation assistance.

Finally, the Parish has identified that Hurricane Isaac overcame the existing sewage capacity and caused a backlog of sewage overrun in the Parish communities. The Parish proposes to address this infrastructure

deficiency through an Emergency Pump Out Instillation Initiative (EPO) that will serve all areas of the Parish.

Diversity and Income Requirements

Jefferson Parish Community Development Department, as the grantee of the allocated federal funds is fully committed to awarding a contract(s) to firm(s) that will provide high-quality services and that are dedicated to diversity and to containing costs. Jefferson Parish Community Development Department strongly encourages the involvement of minority- and/or woman- owned business enterprise (“M/WBEs”) to stimulate participation in procurement and assistance programs.

In addition to the above diversity requirements, and pursuant to Section 3 of the Housing & Urban Development Act of 1968, Jefferson Parish Community Development Department is committed to ensuring that employment and other economic opportunities generated by HUD financial assistance shall, to the greatest extent feasible, and consistent with existing federal, state and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

Lastly, Jefferson Parish is fully committed to using the funding through these programs to affirmatively further fair housing and to comply with all applicable federal, state and local regulations. In adherence to Jefferson Parish Ordinance 25063 relating to fair housing.

Introduction

On August 28th, 2012, Hurricane Isaac made landfall in Louisiana near the mouth of the Mississippi River almost exactly seven years after Hurricane Katrina. For nearly three days, Jefferson Parish was impacted by hurricane force winds, torrential rainfall, and flash flooding. The storm surge reached up to 11 feet in some areas of the State. Flooding overcame the drainage and sewage infrastructure, causing waste and water to back up into residences. Across the State, more than 600,000 households were without power, and nearly all of the Greater New Orleans Area was affected.

In Jefferson Parish, home to more than 400,000 people, the storm surge reached up to 6 feet. Jefferson Parish sustained the largest number of damaged homes from Hurricane Isaac in the State of Louisiana. 12,912 homes sustained storm damage according to FEMA's door-to-door inspections. The total estimated damage to the Jefferson Parish housing stock is over \$224 million. Of that damage dollar value, 63% occurred to households qualifying as low to moderate income population.

The population of Jefferson Parish desperately needs broad assistance in meeting the housing challenges still present from Hurricane Isaac and exacerbated by the lingering effects of the 2005 hurricane season. Additionally, the Parish leadership is looking forward to the next event. They know that they cannot afford to allow identified infrastructure weaknesses to be left unattended.

This Action Plan outlines Jefferson Parish's focused intention for its \$16,453,000 direct allocation. Because the allocation is limited, the Parish will concentrate its efforts in two areas. First, the Parish will strive to meet the unmet housing recovery needs of those residents who are historically underserved in disaster events: namely, the low to moderate income community, and especially the elderly and the disabled. The Parish believes that these residents bear the bulk of the burden of the unmet need still outstanding from Hurricane Isaac. The damage assessment shows the bulk of the need to be moderate repairs over a widespread area, and HAP is designed accordingly.

Secondly, the Parish has identified a deficiency in its sewage overflow capacity systems. During Isaac, the limited sewage processing capacity was overcome by the storm effects. This type of overflow directly impacts the entire Parish community and compounds the already devastating effects of any major storm event. The Parish has concluded that the limited capacity of the sewer systems caused sewage overflow harming residents throughout the Parish including historically underserved populations. The Parish will use part of its direct allocation to address these capacity issues in order to prevent the recurrence of the unsafe and unsanitary living conditions that resulted from sewage overflow in Hurricane Isaac.

Needs Assessment

The needs assessment activities of Jefferson Parish are the starting point of the method of distribution. It is the Parish's goal to ensure that the greatest number possible of traditionally underserved populations be addressed through the distribution of the direct allocation.

This needs assessment focuses primarily on the extent and nature of the housing damage and unmet need in the Parish. Housing unmet need is data that is more readily available to the Parish. Because the amount of allocation that the Parish has received is relatively small in proportion to the damage sustained and existing unmet need, the Parish chooses to focus almost exclusively on housing solutions.

Figure 3.1: Demographics – 2010 Census Data

RACE	
Total population	432,310
One race	425,121
Two or more races	7,189
One race	425,121
White	275,681
Black or African American	113,988
American Indian and Alaska Native	2,333
Cherokee tribal grouping	123
Chippewa tribal grouping	6
Navajo tribal grouping	0
Sioux tribal grouping	68
Asian	16,781
Asian Indian	1,492
Chinese	2,316
Filipino	1,357
Japanese	379
Korean	601
Vietnamese	8,868
Other Asian	1,768
Native Hawaiian and Other Pacific Islander	138
Native Hawaiian	0
Guamanian or Chamorro	114
Samoan	0
Other Pacific Islander	24
Some other race	16,200
Two or more races	7,189
White and Black or African American	1,864
White and American Indian and Alaska Native	1,237
White and Asian	1,206
Black or African American and American Indian and Alaska Native	803

HISPANIC OR LATINO AND RACE	
Total population	432,310
Hispanic or Latino (of any race)	50,761
Mexican	10,753
Puerto Rican	2,339
Cuban	3,385
Other Hispanic or Latino	34,284
Not Hispanic or Latino	381,549
White alone	245,520
Black or African American alone	111,850
American Indian and Alaska Native alone	1,703
Asian alone	16,582
Native Hawaiian and Other Pacific Islander alone	99
Some other race alone	480
Two or more races	5,315
Two races including Some other race	318
Two races excluding Some other race, and Three or more races	4,997

SEX AND AGE	
Total population	432,310
Male	209,567
Female	222,743
Under 5 years	28,138
5 to 9 years	25,660
10 to 14 years	26,796
15 to 19 years	27,529
20 to 24 years	29,381
25 to 34 years	59,971
35 to 44 years	55,765
45 to 54 years	65,887
55 to 59 years	29,721
60 to 64 years	25,087
65 to 74 years	30,919
75 to 84 years	19,762
85 years and over	7,694
Median age (years)	38.5
18 years and over	334,729
21 years and over	318,110
62 years and over	72,560
65 years and over	58,375
18 years and over	334,729
Male	159,854
Female	174,875
65 years and over	58,375
Male	24,177
Female	34,198

INCOME AND BENEFITS (IN 2011 INFLATION-ADJUSTED DOLLARS)	
Families	108,258
Less than \$10,000	5,366
\$10,000 to \$14,999	3,685
\$15,000 to \$24,999	9,737
\$25,000 to \$34,999	10,554
\$35,000 to \$49,999	15,424
\$50,000 to \$74,999	21,058
\$75,000 to \$99,999	15,950
\$100,000 to \$149,999	15,355
\$150,000 to \$199,999	5,753
\$200,000 or more	5,376
Median family income (dollars)	60,252
Mean family income (dollars)	78,548

HOUSING OCCUPANCY	
Total housing units	188,266
Occupied housing units	165,404
Vacant housing units	22,862
Homeowner vacancy rate	2.4
Rental vacancy rate	10.3

The housing stock in Jefferson Parish leans heavily towards single family homeowners. While a high rental vacancy rate exists, the demand is for traditional home ownership.

Housing Damage

Figure 3.2: Real Property Damage Estimation (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	10,581	\$ 7,759,778.94	22.57	\$ 175,113,964.14
Minor-High	791	\$ 3,620,095.36	7.13	\$ 25,801,522.95
Major-Low	197	\$ 2,161,734.48	5.26	\$ 11,360,615.31
Major-High	159	\$ 2,690,752.79	3.78	\$ 10,168,879.94
Severe	34	\$ 916,530.95	2.61	\$ 2,387,923.03
Total	11,762	\$ 17,148,892.52		\$ 224,832,905.36

Figure 3.3: Real Property Damage Estimation for LMI Households (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	6,730	\$ 4,910,263.30	22.57	\$ 110,809,299.86
Minor-High	496	\$ 2,289,317.55	7.13	\$ 16,316,663.91
Major-Low	126	\$ 1,409,429.23	5.26	\$ 7,407,007.40
Major-High	93	\$ 1,637,984.47	3.78	\$ 6,190,262.99
Severe	19	\$ 557,348.75	2.61	\$ 1,452,112.35
Total	7,464	\$ 10,804,343.30		\$ 142,175,346.51

Insurance Damage Estimations

Figure 3.4: Real Property Damage Estimation for Flooded LMI Households w/ No FI. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	189	\$ 238,048.56	22.57	\$ 5,372,012.18
Minor-High	88	\$ 441,703.18	7.13	\$ 3,148,153.18
Major-Low	42	\$ 486,547.85	5.26	\$ 2,556,966.64
Major-High	38	\$ 644,363.09	3.78	\$ 2,435,173.87
Severe	6	\$ 109,663.81	2.61	\$ 285,717.29
Total	363	\$ 1,920,326.49		\$ 13,798,023.17

Figure 3.5: Real Property Damage Estimation for Non-Flooded LMI Households w/ No Haz. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	2,014	\$ 1,439,106.61	22.57	\$ 32,476,139.49
Minor-High	133	\$ 585,195.09	7.13	\$ 4,170,863.76
Major-Low	21	\$ 220,622.24	5.26	\$ 1,159,441.37
Major-High	6	\$ 113,967.98	3.78	\$ 430,707.24
Severe	4	\$ 144,934.96	2.61	\$ 377,612.48
Total	2,178	\$ 2,503,826.88		\$ 38,614,764.35

Figure 3.6: Real Property Damage Estimation for All Flooded Households w/ No FI. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	246	\$ 309,991.07	22.57	\$ 6,995,529.84
Minor-High	107	\$ 542,058.46	7.13	\$ 3,863,415.85
Major-Low	57	\$ 639,743.99	5.26	\$ 3,362,062.01
Major-High	58	\$ 910,247.09	3.78	\$ 3,440,001.40
Severe	9	\$ 161,845.78	2.61	\$ 421,671.81
Total	477	\$ 2,563,886.39		\$ 18,082,680.91

Figure 3.7: Real Property Damage Estimation for All Non-Flooded Households w/ No Haz. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	2,513	\$ 1,791,660.24	22.57	\$ 40,432,173.32
Minor-High	165	\$ 721,629.89	7.13	\$ 5,143,276.16
Major-Low	24	\$ 249,682.42	5.26	\$ 1,312,162.04
Major-High	7	\$ 130,912.33	3.78	\$ 494,743.24
Severe	4	\$ 144,934.96	2.61	\$ 377,612.48
Total	2,713	\$ 3,038,819.84		\$ 47,759,967.25

Unmet Housing Need

The unmet housing need in Jefferson Parish directly attributed to Hurricane Isaac is staggering. Jefferson Parish has more unmet housing need than any other Parish in Louisiana at \$164,741,803.21. This is after a consideration of FEMA Individual Assistance, SBA Housing Loans, and paid hazard and flood insurance claims.

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Jefferson	\$ 224,832,905.36	\$ (9,040,576.47)	\$ (5,301,004.11)	\$ (19,044,321.56)	\$ (26,705,200.00)	\$ 164,741,803.21

Figure 3.8 is representative of the State of Louisiana’s calculation of Unmet Need based on the required methodology of Federal Registry FR-5696-N-01. The unmet need is calculated in consideration of FEMA Individual Assistance program inspections and SBA disaster assistance loan program for housing repair and replacement inspections. Unmet need is the number of housing units with unmet need times the estimated cost to repair those units less repair funds provided by FEMA. Each FEMA inspection is assigned a damage value as follows:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 1 to 4 feet of flooding on the first floor.
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 4 or more feet of flooding on the first floor.

The required calculation for estimated damage based on the above full verified damage levels is shown in Figure 3.9.

Figure 3.9: Real Property Damage Estimation (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	10,581	\$ 7,759,778.94	22.57	\$ 175,113,964.14
Minor-High	791	\$ 3,620,095.36	7.13	\$ 25,801,522.95
Major-Low	197	\$ 2,161,734.48	5.26	\$ 11,360,615.31
Major-High	159	\$ 2,690,752.79	3.78	\$ 10,168,879.94
Severe	34	\$ 916,530.95	2.61	\$ 2,387,923.03
Total	11,762	\$ 17,148,892.52		\$ 224,832,905.36

Based on this calculation, the State of Louisiana and Jefferson Parish have determined the estimated real property damage of low to moderate income households to be \$142,175,346.51. That calculation is demonstrated in Figure 3.10.

Figure 3.10: Real Property Damage Estimation for LMI Households (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	6,730	\$ 4,910,263.30	22.57	\$ 110,809,299.86
Minor-High	496	\$ 2,289,317.55	7.13	\$ 16,316,663.91
Major-Low	126	\$ 1,409,429.23	5.26	\$ 7,407,007.40
Major-High	93	\$ 1,637,984.47	3.78	\$ 6,190,262.99
Severe	19	\$ 557,348.75	2.61	\$ 1,452,112.35
Total	7,464	\$ 10,804,343.30		\$ 142,175,346.51

Given the overwhelming damage sustained by Jefferson Parish low to moderate income families, especially relative to the estimated unmet need shown in Figure 3.8, the Parish considers its top housing priority to be meeting the unmet needs of low to moderate income families.

Infrastructure Status

FEMA Public Assistance Cost Status

Infrastructure addressed by FEMA is through its Public Assistance (PA) program. FEMA meets public infrastructure needs through a series of cost categories. The current status of the Jefferson Parish public infrastructure cost allocation for FEMA is outlined in Figure 3.1.

Category A – Debris Removal	100% of Eligible Cost	100% of Pending Cost
	\$ 9,566,664.71	\$ 50,000.00
Category B - Emergency Measures	100% of Eligible Cost	100% of Pending Cost
	\$ 20,905,856.76	\$ 1,678,589.85
Category C - Roads and Bridges	100% of Eligible Cost	100% of Pending Cost
	\$ 251,625.32	\$ 115,000.00
Category D - Water Control Facilities	100% of Eligible Cost	100% of Pending Cost
	\$ 94.00	
Category E - Buildings and Equipment	100% of Eligible Cost	100% of Pending Cost
	\$ 6,791,840.23	\$ 1,843,227.37
Category F - Utilities	100% of Eligible Cost	100% of Pending Cost
	\$ 1,818,090.76	\$ 100,000.00
Category G - Parks, Recreation and Other Facilities	100% of Eligible Cost	100% of Pending Cat G
	\$ 767,195.68	\$ 230,000.00
Total	\$ 40,101,367.46	\$ 4,016,817.22

Figure 3.12: FEMA Public Assistance Cost Share for Jefferson Parish

Debris	25% Cost Share
	\$ 2,391,666.18
Emergency Measures	25% Cost Share
	\$ 5,226,464.19
Roads and Bridges	25% Cost Share
	\$ 62,906.33
Water Control Facilities	25% Cost Share
	\$ 23.50
Buildings and Equipment	25% Cost Share
	\$ 1,697,960.06
Utilities	25% Cost Share
	\$ 454,522.69
Parks, Recreation and Other Facilities	25% Cost Share
	\$ 191,798.92
Total	\$ 10,025,341.87

Sewage System Capacity

The infrastructure strains of the storm’s impact were felt Parish-wide. Storm drains and sewer lines were stressed due to high inflow and infiltration (I&I), streets flooded due to heavy rainfall, and power was lost throughout the Parish in some areas for as long as three weeks. During this time, Jefferson Parish experienced a multitude of sanitary sewer overflows (SSOs) at many of its sewerage lift stations throughout the Parish. Sanitary sewer overflows during and following the storm occurred at sewerage lift stations that lost power, in which case the pumps did not turn on to pump out sewerage.

The SSOs that occurred in Jefferson Parish during Hurricane Isaac were a result of power outages. Once a sewerage lift station loses power the station can no longer pump sewerage out of the wet well. As residents continue to use water and deliver wastewater to the system, the pump station wet well continues to fill until it eventually overflows. Along with locally generated overflows, systematic overflows were common during Hurricane Isaac as a result of stations which still had power pumping into stations which had lost power.

Improvements are continuously implemented to the Jefferson Parish Sewerage System through the Sewer Capital Improvement Program (SCIP). Many improvements have been made through SCIP to improve the capabilities of the system to operate during hurricanes. Primarily, sewer force mains and pump stations have been upgraded to increase capacity and generators have been installed at critical lift stations so that the system can continue to operate during power outages. However, budget constraints restrict the number of lift stations that can be upgraded, and many lift stations still will not be upgraded through the program.

Additional outstanding damage projects that the Parish hopes to address with future funding include:

- Rosethorne Wastewater Treatment Plant – Approximately 1,200 feet of levee need to be raised to an elevation of +9. Estimated cost of \$500,000.
- Helios Sewer Pump Station Generator – Installation of one 1,250 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1 million.
- Camp Plauche Sewer Pump Station Generator – Installation of one 2,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1.6 million.
- Terrytown II Sewer Pump Station Generator – Installation of one 1,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$750,000.
- Ames & Mayronne Sewer Pump Station Generator – Installation of one 2,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1.6 million.

Economic Impact

In consideration of the extreme focus necessary for the direct allocation, Jefferson Parish does not consider economic impact to be a priority for distribution of funds. Over \$142 million in unmet need for low to moderate income households is still outstanding as a result of Isaac. The Parish must focus its resources to address housing need.

Method of Distribution

Based on the assessment of unmet needs, the Parish decided to focus on two areas of recovery: providing funding for minor home repairs and home elevation match payments for the low income homeowners who have been affected, and shoring up the infrastructure needs to ensure that the costs born from the lack of sewage capacity demonstrated in Isaac are not carried forward into future disasters.

Both of these activities meet the criteria of 24 CFR 570.483 and are activities benefiting low and moderate income families and meeting an urgent need of the Parish in response to Hurricane Isaac. The single family housing activities performed by the Parish will have a prioritization for households with income at or below 80% of the area median family income, have a disabled member of the family, and are located in Lafitte areas. The sewage capacity activities of the Parish will repair the areas damaged by the impacts of Hurricane Isaac.

The overall method of distribution for the allocation can be found in Figure 4.1.

CDBG-DR Programs			
	HAP	ESP	EPO Infrastructure
Activity	\$8,653,190	\$2,250,000	\$4,727,162
Administration	\$ 455,431	\$118,421	\$248,798
Total	\$ 9,108,621	\$2,368,421	\$ 4,975,960

Housing

As demonstrated in the unmet needs assessment section of this action plan, the majority of Jefferson Parish residents live in traditional single family houses and are homeowners. Therefore, the Parish will use the majority of its direct allocation to assist single family homeowners through HAP. The primary focus of HAP will be to address the minor home repair needs of the parish with a prioritization for low-to-moderate income households and households with elderly or disabled members whose homes were damaged by Isaac.

Total HAP Allocation: \$9,108,621

Maximum Unit Award:
\$60,000

Estimated Number of Units Served

The final number of units served will depend on the demonstrated actual repair estimates, and the accounting of the benefits previously received for repairs for each household.

Applicant Eligibility

HAP will be available to all Hurricane Isaac impacted residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac, at the time of application to the program and at the time of program award. Additionally, prioritization will be given to those applicants whose household income is at or below 80% of the Area Median Family Income and have elderly or disabled household members and are located in the defined Lafitte area.

Eligibility Criteria

- Homeownership at the time of Isaac
- Homeownership at the time of application and funding
- Primary residence at the time of Hurricane Isaac
- Unrepaired home damage the resulted from Hurricane Isaac
- Current on Parish property taxes
- Flood insurance must have been maintained on the property at the time of the event if the homeowner received federal disaster assistance for the property related to a prior event

Program Requirements

Prior to closeout of each grant award, homeowners will be required to provide to evidence to the parish of hazard and flood insurance on the property for the value of the property.

Program Priority Applicants

HAP will prioritize applicants in three tiers based on the priorities stated in the unmet needs section of this Action Plan and outlined below. Prioritization will be given to the following groups within each tier:

- Elderly member of household (62 and over). Age will be determined as of December 31, 2012.
- Special needs or disabled member of household. Person must have been determined disabled as of December 31, 2012.
 - For purposes of this prioritization, disabled is
 - (1) an individual disabled according to Medicaid standards or the Social Security Administrations' disability criteria, which includes a finding that an individual cannot do work that he/she did before; that and individual cannot adjust to other work because of his/her medical condition(s); and the disability has lasted or is expected to last for at least one year or to result in death.; and,
 - (2) an individual that receives a monthly benefit from a government agency as a result of the disability.
- Households located in the defined Jean Lafitte area.
 - For purposes of this prioritization the Jean Lafitte area is defined as representative of areas south of the intersection of Barataria Blvd and LA 3134 S.

Below outlines the prioritization within each tier.

Tier I:

- **Tier I (a):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier I (b):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.

Tier II:

- **Tier II (a):** Households whose income is 80% or below AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier II (b):** Households whose income is 80% or below AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

Tier III:

- **Tier III (a):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier III (b):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier III (c):** Households whose income is 81% or above AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier III (d):** Households whose income is 81% or above AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

National Objective:

In accordance with 24 CFR 570.483, HAP will meet the following national objectives:

- Activities benefiting low and moderate income persons
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Elevation Support Program

A significant consideration of Jefferson Parish is to meet the increasingly prohibitive demands of flooding within in the Parish. The Parish is repeatedly impacted by of flooding during major events due to the relatively low elevation of the Parish and the lack of funding needed to properly elevate the existing housing stock, especially in relation to low to moderate income families.

The Parish has an existing Hazard Mitigation Grant Program (HMGP) that is able to provide assistance to families in need of support to elevate existing properties to safe and secure levels. This program is a strong initiative within the Parish, and is targeted towards meeting the needs of families who desperately want to responsibly elevate but who cannot afford it. However, the program requires a match from the Hazard Mitigation Program in order for home owners to participate.

The ESP will provide up to \$30,000 in elevation support to applicants who meet the eligibility criteria outlined below. The goal of the program is to elevate a home up to the most current floodplain standards as determined by the Jefferson Parish Department of Hazard Mitigation in order to repair existing unmet need damage and in order to prevent future impact through responsible mitigation. In the event that the amount of funding available through ESP will not completely elevate the home, program participants will be required to demonstrate that they are able to provide the balance in funding necessary to completely elevate the home through participation in HMGP. ESP may be joined with HAP in order to provide funding for both repair and elevation.

Total ESP Allocation: \$2,368,421

Maximum Unit Award: \$30,000

Estimated Number of Units Served:

The final number of units served will depend on the demonstrated actual elevation costs and calculation of previous benefits received by each household.

Applicant Eligibility

ESP will available to all Hurricane Isaac impacted residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac, at the time of application to the program and at the time of program award. Additionally, prioritization will be given to those applicants whose household income is at or below 80% of the Area Median Family Income, have elderly or disabled household members, and are located in the defined Lafitte area.

Eligibility Criteria

- Homeownership at the time of Isaac
- Homeownership at the time of application and funding
- Primary residence at the time of Hurricane Isaac
- Unrepaired home damage the resulted from Hurricane Isaac

- Current on property taxes
- Flood insurance must have been maintained on the property at the time of the event if the homeowner received federal disaster assistance for the property related to a prior event

Program Requirements

Prior to closeout of each grant award, homeowners will be required to provide to evidence to the parish of hazard and flood insurance on the property for the value of the property.

Program Priority Applicants

ESP will prioritize applicants in three tiers based on the priorities stated in the unmet needs section of this Action Plan and outlined below. Prioritization will be given to the following groups within each tier:

- Elderly member of household (62 and over). Age will be determined as of December 31, 2012.
- Special needs or disabled member of household. Special needs or disabled member of household. Person must have been determined disabled as of December 31, 2012.
 - For purposes of this prioritization, disabled is
 - (1) an individual disabled according to Medicaid standards or the Social Security Administrations' disability criteria, which includes a finding that an individual cannot do work that he/she did before; that and individual cannot adjust to other work because of his/her medical condition(s); and the disability has lasted or is expected to last for at least one year or to result in death.; and,
 - (2) an individual that receives a monthly benefit from a government agency as a result of the disability.
- Households located in the Jean Lafitte area.
 - For purposes of this prioritization the Jean Lafitte area is defined as representative of areas south of the intersection of Baratavia Blvd and LA 3134 S.

Below outlines the prioritization within each tier.

Tier I:

- **Tier I (a):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier I (b):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier I (c):** Households with expiring federal funding, more specifically with FEMA funds.

Tier II:

- **Tier II (a):** Households whose income is 80% or below AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier II (b):** Households whose income is 80% or below AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

Tier III:

- **Tier III (a):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is located in the designated Jean Lafitte area.

- **Tier III (b):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier III (c):** Households whose income is 81% or above AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier III (d):** Households whose income is 81% or above AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

National Objective:

In accordance with 24 CFR 570.483, ESP will meet the following national objectives:

- Activities benefiting low and moderate income persons
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Infrastructure

In order to address the Parish’s primary infrastructure concern of sewage pump capacity, the Parish will implement an Emergency Pump Out (EPO) installation initiative. This initiative will be directed by the Jefferson Parish Department of Sewerage. Emergency Pump Outs (EPOs) will be installed or current EPOs will be upgraded on the lift stations so that temporary pumps can move flow through the lift station. An EPO is a small modification which can be placed on the piping of the lift station and allow for quick connection to a temporary backup pump that can be delivered to the station. If a lift station is not equipped with an EPO, the only method of removing wastewater from the station is through the use of vacuum trucks which are inefficient and labor intensive.

Project Total Allocation: \$ 4,975,960

Currently there are 516 lift stations throughout Jefferson Parish and 273 of these lift stations are not equipped with an EPO. In addition, electricity was lost at 86% of lift stations on the West Bank and 54% of lift stations on the East Bank. As a result, vacuum trucks and other bypass pumping methods were required to remove sewerage from lift stations, costing Jefferson Parish \$4,953,534 in vacuum truck services and a total of \$6,072,871 in pumping and hauling, including vacuum truck services. This cost does not include additional time and labor required of Jefferson Parish Department of Sewerage employees during Hurricane Isaac.

To reduce SSOs and associated costs during future emergencies, the Jefferson Parish Department of Sewerage proposes to install EPOs on as many lift stations as possible throughout the parish. Additionally, the Parish will also modify existing EPOs, which will include the replacement of undersized EPOs with higher capacity EPOs and to relocate inaccessible EPOs to accessible locations.

The current practice of using vacuum trucks is both costly and inefficient. Installing and modifying EPOs at more sewerage lift stations throughout the Parish would greatly reduce the cost of eliminating SSOs at

lift stations during hurricanes and other times of emergency. In addition, the Department of Sewerage would be better prepared to alleviate SSOs at lift stations during these times and quickly restore service to residents.

If the Parish at any time feels that it is in jeopardy of meeting 50% overall benefit requirement, the Parish will need to separate the project into an LMI activity and an Urgent Need activity.

National Objective:

In accordance with 24 CFR 570.483, EPO Instillation Initiative will meet the following national objectives:

- Activities a Low to Moderate Area benefit
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Performance Metrics

Jefferson Parish is committed to assisting residents impacted by hurricane Isaac in the most expedient way possible. The storm events of the past decade have left Louisianans with a keen awareness of the inevitability of another hurricane in the future. Therefore, the repair and mitigation measures outlined in this plan will be implemented in accordance with all the regulations imposed by PL 113-2.

The Parish is working to finalize the procurement of a contractor to provide assistance in implementing HAP and ESP. Additionally, the parish is continually working to improve the program guidelines for implementation. Furthermore, all HAP and ESP funds must be committed by September 30, 2017, and expended with in the requirements outlined in the regulations.

Construction Standards

Jefferson Parish is committed to building safe, sanitary housing that is focused on green standards and sustainability. Louisiana has adopted as its building standard the 2009 International Residential Code and subsequent editions, which is focused on the most up-to-date regulations for durability and high quality. All Program housing activities will be built to this standard. Jefferson Parish encourages that HAP funded housing will be built in consideration of ENERGY STAR and LEED best practices for efficiency, sustainability and place-making. Furthermore, all elevation activities will meet or exceed the Advisory Base Flood Elevation standards for Jefferson Parish in an effort to protect against sea level rise.

Priority Needs for Elderly and Disabled Population

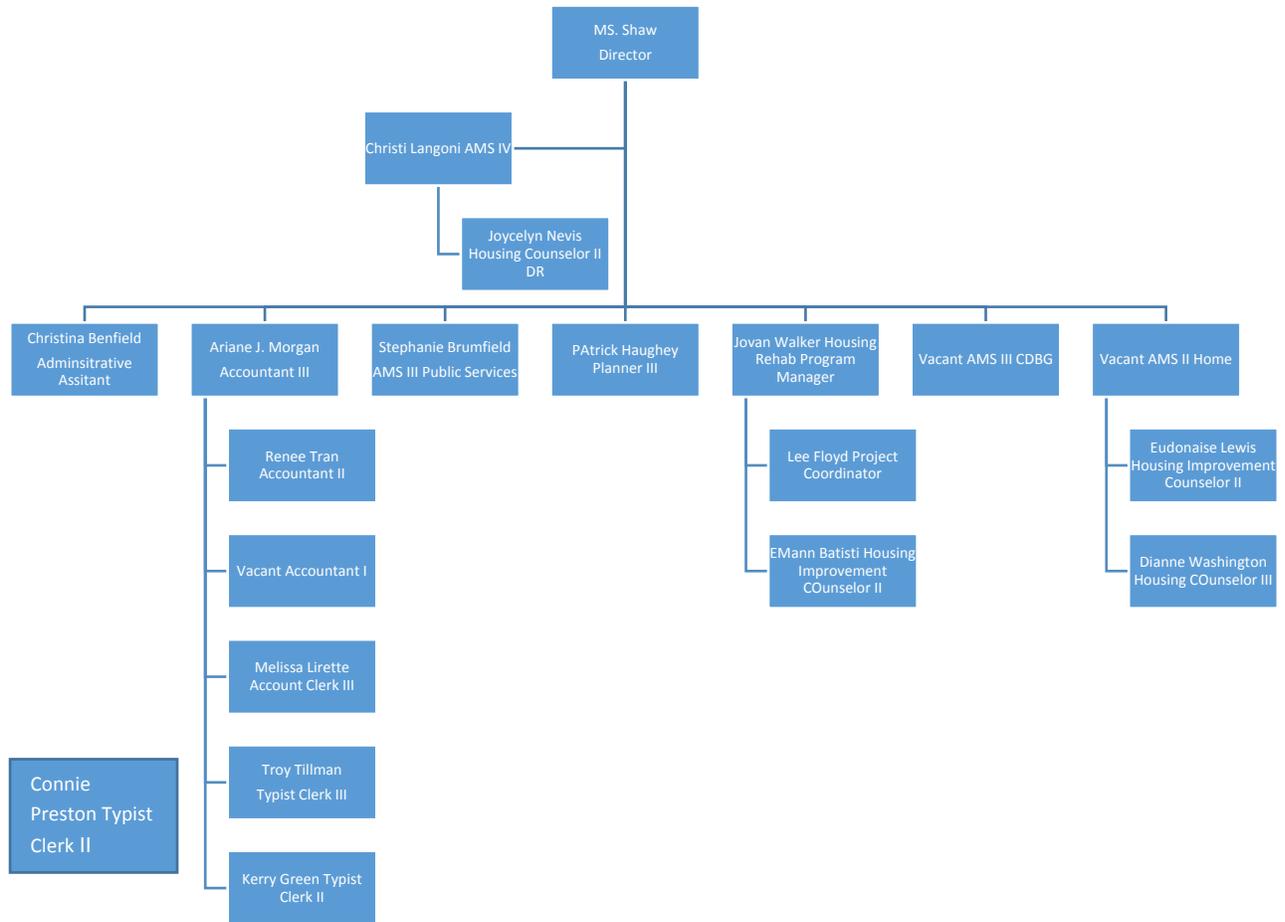
Jefferson Parish's primary focus for the disaster recovery allocation of funding is to assist those low to moderate income residents who experienced damage from Isaac, especially those who are either elderly or are living with a disability. The Parish will focus its efforts on supporting these special needs populations.

The Parish believes that the proper execution of its HAP and ESP as outlined in the Method of Distribution will serve to strengthen the housing stock, and provide resilient housing for Hurricane impacted Parish residents.

Administration and Monitoring

JPCD will be the primary administrative entity for the Community Development Block Grant – Disaster Recovery funds, and will be in charge of ensuring that Program requirements and eligibility standards are met. JPCD will partner with other departments within the parish to ensure the efficient implementation the disaster recovery programs. The Department of Sewerage will be responsible for the daily administration of the infrastructure portion of the allocation, it will report to the Community Development Department for overall oversight of the funding. Additionally, ESP will be administered in coordination with the FloodPlain Management and Hazard Mitigation Department.

The organizational chart of JPCD is shown in Figure 8.1. In order to meet the needs of the Program activities outlined in the Method of Distribution, the Community Development Department hired additional staff, including an administrative management specialist IV whose sole charge will be the administration of the Program. Furthermore, Jefferson Parish Community Development is finalizing a contract with a firm to conduct program management of HAP and ESP.



JPCD has engaged a technical assistance provider to ensure that the CDBG-DR is administered with the absolute minimum of waste and maximum of efficiency.

JPCD will work with the Jefferson Parish Internal Audit Department to ensure that programs are implemented in accordance with federal, state and local guidelines.

Through third party contractors and JPCD staff, a CDBG-DR monitoring plan will be designed and implemented and will include a uniform risk assessment assess all activities. Based on the risk assessment, JPCD will conduct desk and site reviews as called for by the monitoring plan. All housing units served by the Program will be monitored at least once during the life of the program.

JPCD will consult with technical assistance consultants to make streamline the monitoring approach in order to prevent any waste from occurring in the monitoring of Program expenditures.

Program Income

In accordance with 24 CFR 570.489, any income generated by the activities herein described will be distributed through HAP, ESP or EPO to increase the number of residents served in the respective program which generated the program income. At this time, Jefferson Parish does not anticipate generating any program income from Hurricane Isaac programs.

Preventing Fraud, Waste and Abuse

Jefferson Parish is ready to ensure that the allocation for disaster recovery is spent for its intended purpose. JPCD will ensure that the Department of Sewerage, Department of Floodplain Management and Hazard Mitigation meet the required internal controls of all disaster administration processes and policies. JPCD will revise and implement new policies and procedures at the recommendation of the Internal Audit division, HUD and the State of Louisiana.

The Parish will adhere to the conflict of interest provisions referenced at 24 CFR 570.611

JPCD along with third party contractors, will focus preventing fraud, waste and abuse for both HAP and ESP, by ensuring a verification of applicant documents. When applicable, the parish will work with internal departments or third party entities to verify documents submitted by applicants.

Given the extreme focus needed to maximize the Isaac allocation, the Parish cannot afford to lose any of its funding to waste or negligence. Jefferson Parish is completely committed to appropriate oversight and will do everything within its power to ensure that disaster recovery funding is allocated and spent appropriately. Additionally, JPCD is committed to work with the Internal Audit division to ensure that programs are monitored regularly and all applicable federal, state and local laws are followed.

Substantial Changes to the Action Plan

The following occurrences will require a substantial amendment to this Action Plan.

- Change in Program Benefit or Eligibility Criteria
- A new allocation or reallocation of more than \$1,000,000.00
- The addition or deletion of an activity

A substantial amendment to this Action Plan will be posted for public comment and subject to public hearings in the same nature as this original Action Plan and as required in the Federal Register Notices which pertain to PL-113-2.

Citizen Participation Plan

Citizen Participation Plan adopted by the Parish for CDBG shall be applicable to the Plan for Isaac and added resolution of adopting Action Plan.

Appendix A – Community Participation

In order to incorporate public comment as much as possible, Jefferson Parish hosted two public meetings to present this Action Plan to the Parish residents. Both meetings were held on August 22, 2013. The meeting times and locations were:

East Bank
Jefferson Parish
Joseph S. Yenni Building
1221 Elmwood Park Blvd., Suite 405
Jefferson, LA 70123
8/22/13 – (10:00 a.m. – Noon)

West Bank
Jefferson Parish
General Government Building
200 Derbigny Street – (Council Chambers)
Gretna, LA 70053
8/22/13 – (2:00 p.m. – 5:00 p.m.)

The public meetings were advertised in the Times-Picayune on August 16, 2013.

In order to solicit comment from as wide an audience as possible, Jefferson Parish also posted a draft of the Action Plan on the Parish website. The Action Plan was posted for public comment on August 13, 2013.

Finally, the Action Plan was reviewed and ratified by the Parish council on August 26, 2013 pursuant to Resolution No. 121492. At this council meeting, the floor was opened for comments on the Action Plan.

No comments were provided to the Parish regarding this Action Plan. The Parish considers the relative lack of public comment to be consistent with prior participation in similar comment opportunities. For example, the Parish's FY 2013 Action Plan comment period also received a similar lack of public participation.

In order to ensure that the Isaac Action Plan was in accordance with Public Law 113-2, public comments were solicited in the local newspapers, more specifically, the Advocate on July 4 and 7, 2016 and the Times-Picayune on September 7, 2016. Jefferson Parish also posted a draft of the Amended Action Plan on the Parish website. Public meetings were held on July 27, 2016 and September 21, 2016 at the Jefferson Parish Council meetings. The amendments to the Isaac Action Plan were reviewed and ratified by the Parish Council on September 21, 2016 pursuant to Resolution No. 127927. At this Council meeting, the floor was opened for public comment and no comments were received. Also, no comments have been received from the initial public notice in which the public comment period ended August 5, 2016.

Representation of the Parish's disaster recovery action plan public comment posting, as well as examples of historic public participation offerings, are provided in this Appendix on the following pages. Additionally, a copy of the Parish council's adoption of this Action Plan is also provided.

Appendix B – Maps