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EXECUTIVE SUMMARY

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 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.

FIGURE 1-1: UNMET NEED FOR JEFFERSON PARISH						
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.

FIGURE 1-1: PROGRAMS			
	HAP	ESP	EPO Infrastructure
Activity	\$ 8,653,190.00	\$ 2,250,000.00	\$ 4,727,160.00
Administration	\$ 455,431.05	\$ 118,421.05	\$ 248,797.89
Total	\$ 9,108,621.05	\$ 2,368,421.05	\$ 4,975,957.89

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 will focus on smaller repair funding with support for the rising cost of insurance premiums to battle involuntary displacement and protect against future flooding impact.

Second, the Parish will engage in an Elevation Support Program to assist homeowners who are interested in raising their homes against the event of future disasters. These funds may be used as match for the Hazard Mitigation Grant Program that is currently available for flood elevation assistance, or the homeowner may provide the balance of the funding to elevate the home themselves.

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 a capacity program that will serve all Parish residents in the event of a future disaster, but especially those low to moderate income residents who may not otherwise have the ability to repair such additional, compounded damage to their homes.

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.

INTRODUCTION

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.

The Parish will strive to meet the housing 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. 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 housing 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 the housing assistance program is designed accordingly. The Parish will also strive to meet the increased need related to elevation and flood insurance premiums brought about by the 2012 flood insurance reforms. The Parish has determined that these reforms may have a negative impact on the historically underserved populations that its housing program targets, and that making assistance with flood-related issues to this population is in the overall best interest of the Parish.

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 diversely impacts the entire Parish community and compounds the already devastating effects of any major storm event. Furthermore, the Parish has concluded that sewage overflow due to limited capacity especially harms the historically underserved populations targeted by its Program because those residents are the least able to leverage independent resources to repair the negative impact of sewage overflow. 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

NEEDS ASSESSMENT

The Parish chooses to focus almost exclusively on housing solutions. The needs assessment activities of Jefferson Parish are the starting point of the method of distribution. Without first assessing which parts of the Parish were most directly affected, as well as which parts of the Parish remain unassisted, the CDBG allocation cannot be appropriately leveraged. 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.

Demographics – 2010 Census Data

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

FIGURE 3-1: DEMOGRAPHICS – 2010 CENSUS DATA (CONTINUED)

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

FIGURE 3-1: DEMOGRAPHICS – 2010 CENSUS DATA (CONTINUED)	
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 FL. 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 FL. 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 current unmet housing need related in Jefferson Parish that can be 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.

FIGURE 3-8: UNMET NEED FOR JEFFERSON PARISH						
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

The Parish considers its top housing priority to be meeting the needs of low to moderate income families. 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 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 3-11.

FIGURE 3-11: FEMA PUBLIC ASSISTANCE COST STATUS		
Category A – Debris Removal	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 9,566,664.71	\$ 50,000.00
Category B - Emergency Measures	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 20,905,856.76	\$ 1,678,589.85
Category C - Roads and Bridges	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 251,625.32	\$ 115,000.00
Category D - Water Control Facilities	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 94.00	
Category E - Buildings and Equipment	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 6,791,840.23	\$ 1,843,227.37
Category F - Utilities	<i>100% of Eligible Cost</i>	<i>100% of Pending Cost</i>
	\$ 1,818,090.76	\$ 100,000.00
Category G - Parks, Recreation and Other Facilities	<i>100% of Eligible Cost</i>	<i>100% of Pending Cat G</i>
	\$ 767,195.68	\$ 230,000.00
Total	\$ 40,101,367.46	\$ 4,016,817.22

FEMA Public Assistance Cost Share for Jefferson Parish

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 (SSO's) 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 SSO's 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

METHOD OF DISTRIBUTION

Based on the assessment of need, the Parish has decided to focus on two areas of recovery: providing for the low income homeowners who have been affected most severely, 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 as activities benefiting low and moderate income families. The single family housing activities performed by the Parish will be focused entirely on households making at or below 80% of the area median family income. The infrastructure activities will benefit the entire population of the affected area; however, because low to moderate income households have fewer resources, they are traditionally impacted more heavily and for a longer sustained period of time by infrastructure overflow. The sewage capacity activities of the Parish will directly benefit all low to moderate income households in the affected area.

The overall method of distribution for the allocation can be found in Figure 4-1.

FIGURE 4-1: PROGRAMS			
	HAP	ESP	EPO Infrastructure
Activity	\$ 8,653,190.00	\$ 2,250,000.00	\$ 4,727,160.00
Administration	\$ 455,431.05	\$ 118,421.05	\$ 248,797.89
Total	\$ 9,108,621.05	\$ 2,368,421.05	\$ 4,975,957.89

Housing

The primary focus of HAP will be to address the repair needs of low-to-moderate income households whose homes were damaged by Isaac.

As demonstrated in the 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 a Homeowner Assistance Program (HAP). The primary focus of HAP will be to address the repair needs of low-to-moderate income households whose homes were damaged by Isaac.

Since the implementation of the 2012 Biggert-Waters Flood Insurance Reform Act, flood insurance premiums for homes in areas like Jefferson Parish are a barrier to low to moderate income families owning homes where they have traditionally lived. In order to support those families in Jefferson Parish, the HAP program will offer an insurance relief measure to qualified applicants.

Activity Allocation: \$9,108,621.05

Maximum Unit Award:

- \$60,000
 - Up to \$50,000 for home repair
 - Up to \$10,000 for increased flood insurance premium assistance

<i>HAP Cap</i>	\$ 60,000.00
<i>Repair</i>	\$ 50,000.00
<i>Insurance</i>	\$ 10,000.00
<i>Estimated HAP Units</i>	120 - 130

Estimated Number of Units Served:

Based on the unit award options, the Parish estimates serving between one hundred twenty and one hundred thirty households through HAP. The final number of units served will depend on the demonstrated actual repair, elevation and insurance costs of each household.

Applicant Eligibility:

HAP will target those residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac and whose household income is at or below 80% of the Area Median Family Income.

Eligibility Criteria:

- Home ownership at the time of Isaac
- Current home ownership
- Primary residence
- Household income at or below 80% AMFI
- Unrepaired home damage the resulted from Isaac
- Demonstrated use of prior benefits to meet damage need
- 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:

Eligible HAP applicants who receive program assistance will be required to sign a forgivable promissory note. The promissory note will enforce a three year residence period onto the property. Should the home owner sell the property, or cease to use the property as a primary residence, the full amount of assistance provided by HAP will be repaid to Jefferson Parish at a rate of LIBOR plus 1%. Furthermore, the home owner will be required to maintain hazard and flood insurance on the property for the value of the property during the three year residence period enforced by the promissory note. Failure to do so may prevent the applicant from receiving disaster recovery assistance in the future. The insurance assistance measure of HAP may be used towards the payment of the required insurance premiums.

Program Priority Applicants:

- Elderly member of household (62 and over)
- Special needs or disabled member of household
- Household exists in a high flood risk area

General population applicants will be considered after the above-mentioned priority population applicants. Furthermore, applicants in the Jean Lafitte area may be considered as priority applicants due to the Parish's determination that more damage was sustained in that area relative to the other areas in the Parish.

National Objective Met: Service of low to moderate income population.

Elevation Support Program

A significant consideration of Jefferson Parish is to meet the increasingly prohibitive demands of flooding within in the area. The Parish has repeatedly come under the effects of flooding in major events due to the relatively low elevation of the entire community 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 \$X.XX 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 in order for home owners to participate.

In order to honor the intent of the low to moderate income home owners who want to responsibly elevate their homes but are unable to provide the HMGP match, the Parish will use \$2,368,421.05 of its direct CDBG allocation to provide an Elevation Support Program (ESP).

The ESP will provide up to \$30,000 in elevation support to qualified low to moderate income families.

The goal of the program is to elevate a home up to 2013 standards in order to repair existing unmet need damage and in order to prevent future impact through responsible mitigation. The goal of the program is to elevate a home up to 2013 standards in order to resolve repair existing unmet need damage and in order to prevent future impact through responsible mitigation. Home owners will be required to demonstrate that the amount of requested ESP funding will elevate the home to standard (see Figure XX). 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, either through participation in HMGP or through other means. ESP may be joined with HAP in order to repair, elevate and insure the low to moderate income family housing stock.

Activity Allocation: \$2,368,421.05

Maximum Unit Award: \$30,000

Estimated Number of Units Served:

The Parish estimates serving seventy-five (75) households through ESP. The final number of units served will depend on the demonstrated actual elevation costs of each household.

Applicant Eligibility:

ESP will target those residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac and whose household income is at or below 80% of the Area Median Family Income.

Eligibility Criteria:

- Home ownership at the time of Isaac
- Current home ownership
- Primary residence
- Household income at or below 80% AMFI
- Demonstrated ability to provide balance in funding to completely elevate property
- 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:

Eligible ESP applicants who receive program assistance will be required to sign a forgivable promissory note. The promissory note will enforce a three year residence period onto the property. Should the home owner sell the property, or cease to use the property as a primary residence, the full amount of assistance provided by HAP will be repaid to Jefferson Parish at a rate of LIBOR plus 1%. Furthermore, the home owner will be required to maintain hazard and flood insurance on the property for the value of the property during the three year residence period enforced by the promissory note. Failure to do so may prevent the applicant from receiving disaster recovery assistance in the future. The insurance assistance measure of HAP may be used towards the payment of the required insurance premiums.

Program Priority Applicants:

- Elderly member of household (62 and over)
- Special needs or disabled member of household
- Household exists in a high flood risk area

General population applicants will be considered after the above-mentioned priority population applicants. Furthermore, applicants in the Jean Lafitte area may be considered as priority applicants due to the Parish's determination that more damage was sustained in that area relative to the other areas in the Parish.

National Objective Met: Service of low to moderate income population.

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 Parish Department of Sewerage. Emergency Pump Outs (EPO's) can be installed 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: \$4,975,957.89

Project Number of Units Served: 273

National Criteria Met: Service to low to moderate income families and urgent need

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 \$4,953,533.75 in vacuum truck services and a total of \$6,072,871.32 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 SSO's and associated costs during future emergencies, the Jefferson Parish Department of Sewerage proposes to install EPO's on as many lift stations as possible throughout the parish. A summary of the total number of EPO's with respect to size required and total cost of the project is presented in Figure 4-2 below:

FIGURE 4-2:			
Size	Number Required	Cost per EPO	Subtotal
4-inch	191	\$14,240	\$2,719,840
6-inch	28	\$14,875	\$416,500
8-inch	8	\$18,055	\$144,440
10-inch	19	\$18,930	\$359,670
12-inch	27	\$21,730	\$586,710
Total	273		\$4,227,160

The current practice of using vacuum trucks is both costly and inefficient. Installing EPO's at more sewerage lift stations throughout the Parish would greatly reduce the cost of eliminating SSO's at lift stations during hurricanes and other times of emergency. In addition, the Department of Sewerage would be better prepared to alleviate SSO's at lift stations during these times and quickly restore service to residents.

PERFORMANCE METRICS

PERFORMANCE METRICS

Jefferson Parish is committed to assisting residents in the most expedient way possible. Residents who still have existing storm damage from Hurricane Isaac have been waiting for a year for assistance, and they cannot afford to wait longer. Furthermore, the storm events of the past decade have left Louisianans with a keen awareness of the inevitability of another hurricane in the future. The question is not if, but when. Therefore, the repair and mitigation measures outlined in this plan must also be implemented with the utmost haste and efficiency.

The Parish is committed to having program guidelines ready and approved within 60 days of Action Plan approval. Furthermore, all Program housing funds will be committed and construction complete by June 2015. All Program funding will be disbursed and closed out by December 2015.

CONSTRUCTION STANDARDS

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, 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. Furthermore, wherever possible, Program 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.

SPECIAL NEEDS, DISPLACEMENT
PREVENTION, AND
HOMELESS SUPPORT

SPECIAL NEEDS, DISPLACEMENT PREVENTION, AND HOMELESS SUPPORT

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 housing programs as outlined in the Method of Distribution will serve to prevent the long-term displacement of the Parish residents. The Parish believes that the proper execution of its housing programs as outlined in the Method of Distribution will serve to prevent the long-term displacement of the Parish residents. Furthermore, the Program assistance with flood insurance premiums is directly targeted at those residents who, without that assistance, would certainly relocate to areas with less demanding home insurance burdens.

Jefferson Parish currently addresses homelessness through its homeless shelters initiatives administered by the Department of Community Development. Specifically, the Parish funds Catholic Charities through an Emergency Shelter Grant to operate the Jefferson Family Care Center. Jefferson Parish continues its commitment to serve the homeless population in every way possible, and will continue its community partnership collaborations to leverage resources in order to meet this important need.

ADMINISTRATION AND MONITORING

ADMINISTRATION AND MONITORING

Jefferson Parish Department of Community Development will be the primary administrative entity for the direct allocation. The Community Development Department will be in charge of ensuring that Program requirements and eligibility standards are met. While the Public Works Department 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.

The Community Development Department will be hiring additional staff, including an assistant director whose sole charge will be the administration of the Program.

The current employee count for the Department of Community Development is 18. The organizational chart of the Community Development Department 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 will be hiring additional staff, including an assistant director whose sole charge will be the administration of the Program. The Parish is also committed to bolstering its field team, and will bring on additional inspections team members to ensure that all construction work is performed in accordance with federal and local requirements.

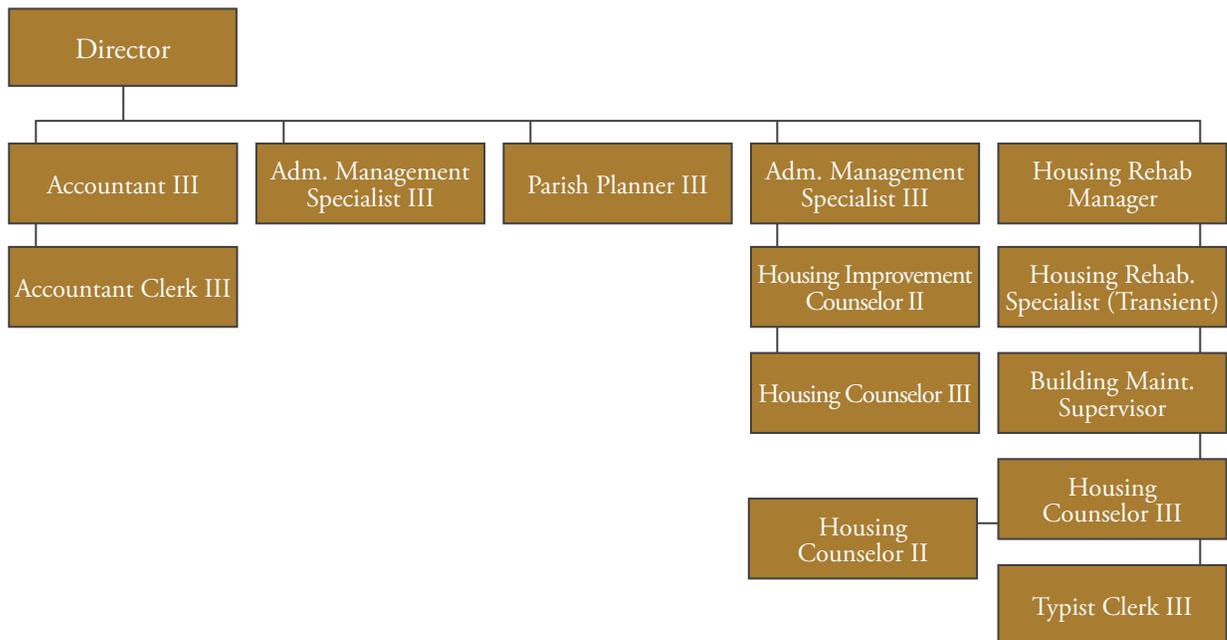


FIGURE 8-1

If necessary, the Parish is committed to increasing its capacity to administer the Program through bringing on third party contractors. Plans are already in place to engage a firm to perform the necessary broad and site specific environmental reviews for construction. After consulting with the Internal Audit Department on their internal control strength and risk related to program administration, the Parish may also engage a technical assistance provider to ensure that the Program is administered with the absolute minimum of waste and maximum of efficiency.

The Community Development Department will work with the Internal Audit Department to identify areas of the Program administration that present the highest risk of violations of federal and Program guidelines and develop a monitoring plan accordingly. Monitoring activities will include desk and site reviews as called for by the monitoring plan. The Community Development Department will be in charge of implementing the monitoring plan. All housing units served by the Program will be monitored at least once during the three year commitment period of the Program.

The Internal Audit Department will also recommend areas to the Community Development Department where it would be helpful to bring on outside monitoring consultants. Such monitoring consultants would be responsible for making recommendations to streamline the monitoring approach in order to prevent any waste from occurring in the monitoring of Program expenditures.

PROGRAM INCOME

PROGRAM INCOME

In accordance with 24 CFR 570.489, any income generated by the activities herein described will be distributed through the Program to increase the number of residents served.

PREVENTING FRAUD, WASTE AND ABUSE

PREVENTING FRAUD, WASTE AND ABUSE

Jefferson Parish is ready to ensure that the allocation for disaster recovery is spent for its intended purpose. The Jefferson Parish Public Works and Jefferson Parish Community Development Department will work with the Jefferson Parish Internal Audit Department to review the internal controls of all disaster administration processes and policies. Both agencies will revise and implement new policies and procedures at the recommendation of the Internal Audit division. Particular attention will be paid to the appropriate division of duties in order to provide that no individual personnel member has the ability to unduly circumvent the disaster recovery implementation controls.

Anyone, whether a resident of the Parish or not, who suspects that fraud, waste or abuse is occurring in relation to the disaster recovery programs will be able to call in anonymously to provide information on the specifics of the suspected infraction.

Jefferson Parish Community Development will also implement a fraud, waste and abuse hotline for the duration of the administration of the disaster recovery programs. Anyone, whether a resident of the Parish or not, who suspects that fraud, waste or abuse is occurring in relation to the disaster recovery programs will be able to call in anonymously to provide information on the specifics of the suspected infraction.

Jefferson Parish will designate a fraud, waste and abuse panel to review all accusations and suspicions of inappropriate behavior in relation to the disaster recovery programs. The panel will be made up of Parish employees and community leaders. This panel will act as an objective body able to task the Internal Audit division with reviewing suspected fraud, waste and abuse as the panel deems necessary.

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

Given the extreme focus needed to maximize the direct 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.

SUBSTANTIAL CHANGES TO THE ACTION PLAN

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

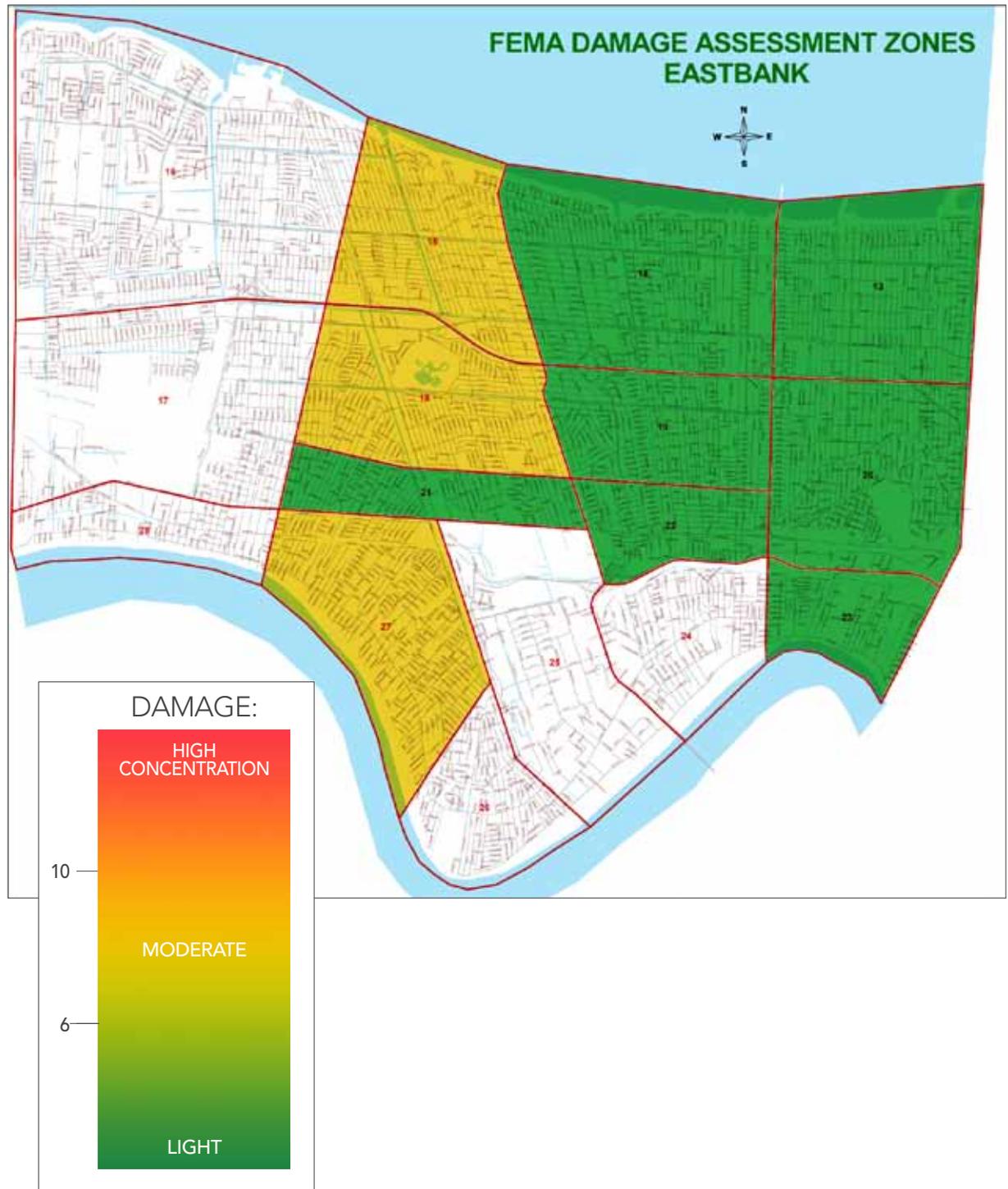
A substantial amendment to this Action Plan will be posted for public comment and subject to public hearings in the same nature as this original Action Plan.

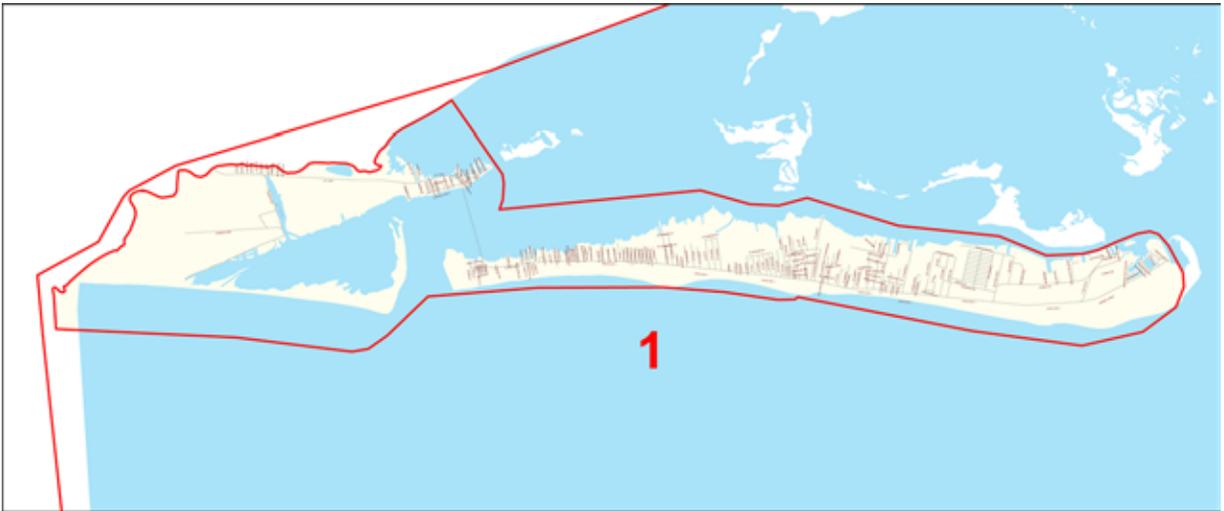
APPENDIX A: COMMUNITY PARTICIPATION

COMMUNITY PARTICIPATION RECORD

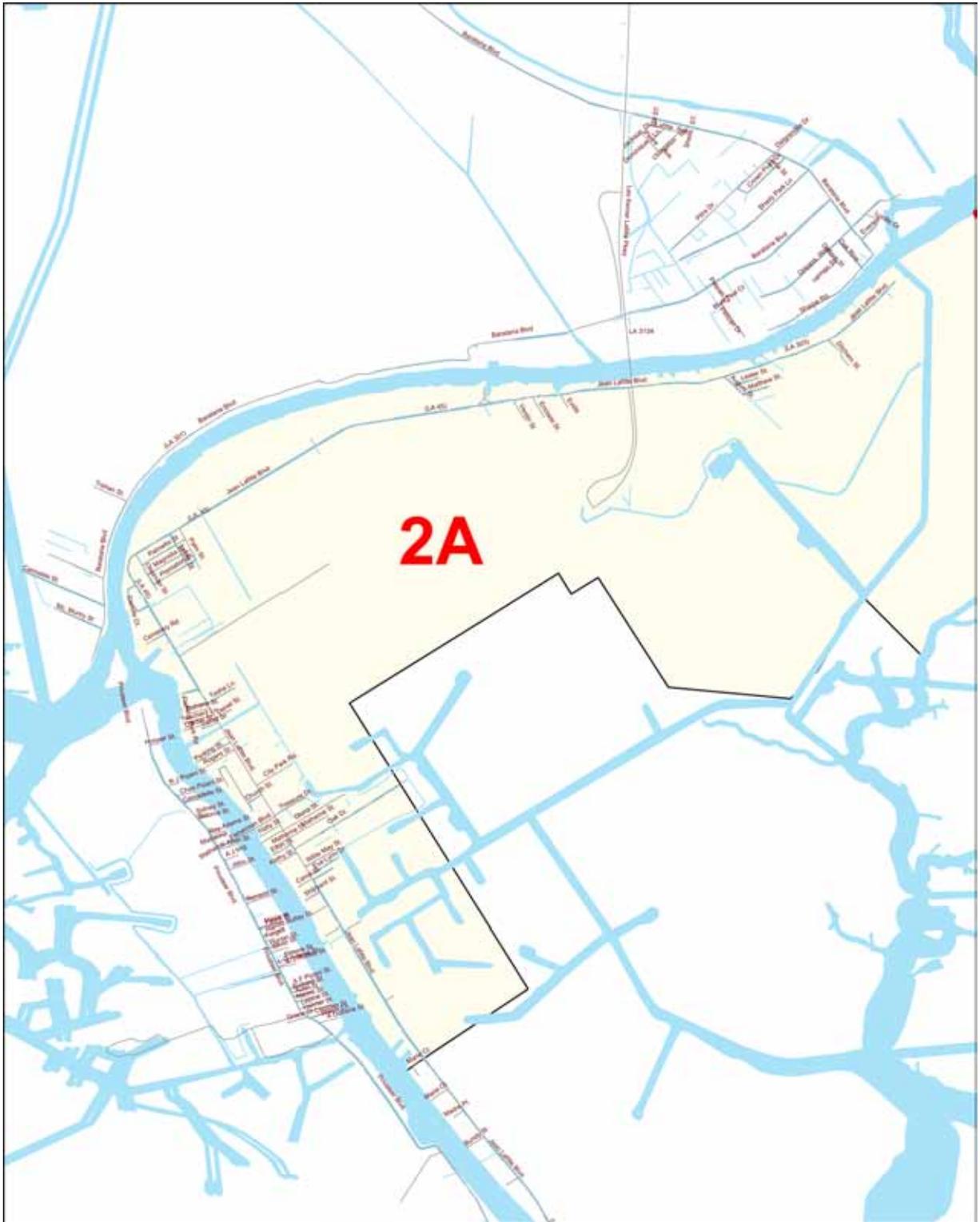
APPENDIX B: MAPS

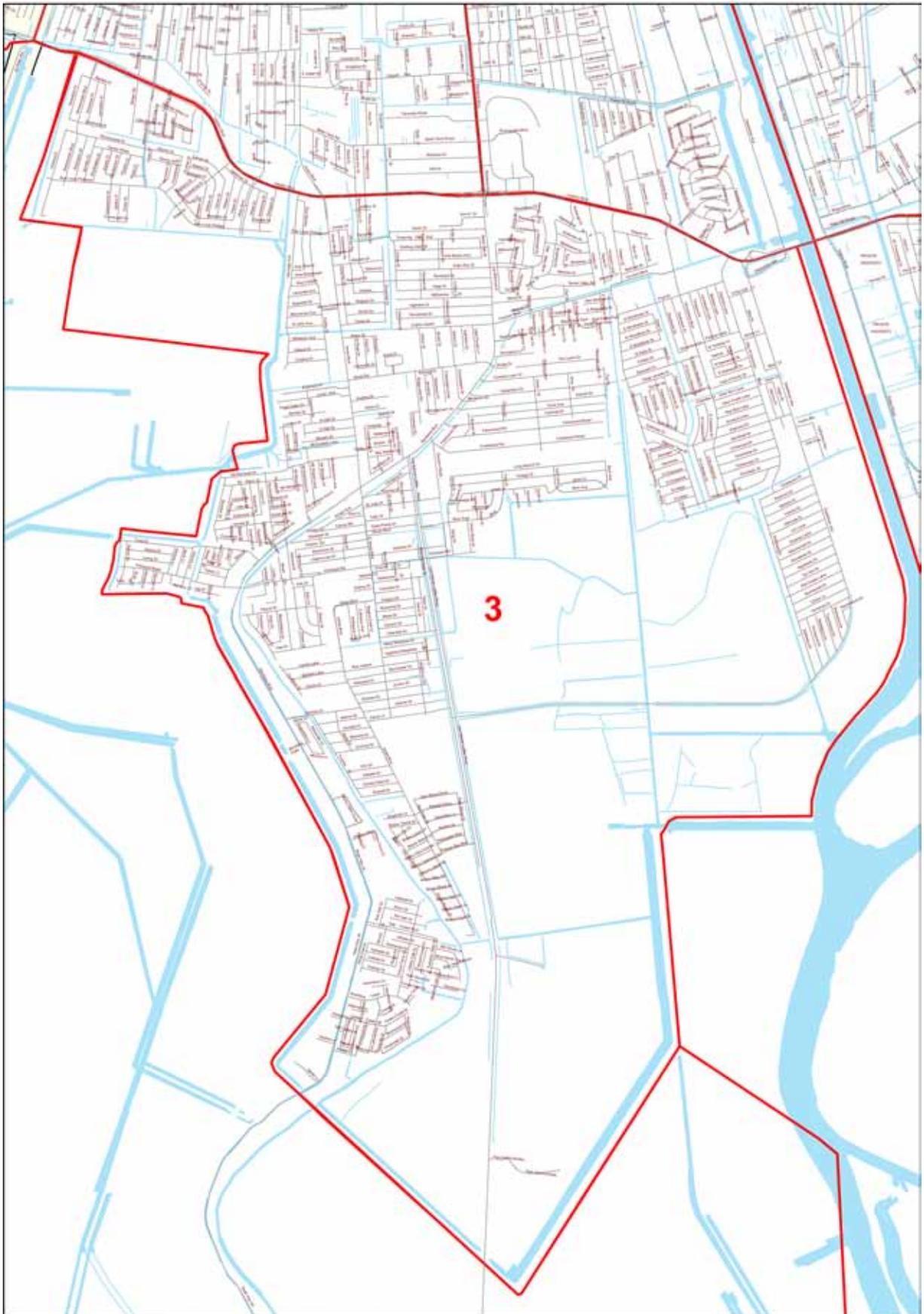
EASTBANK



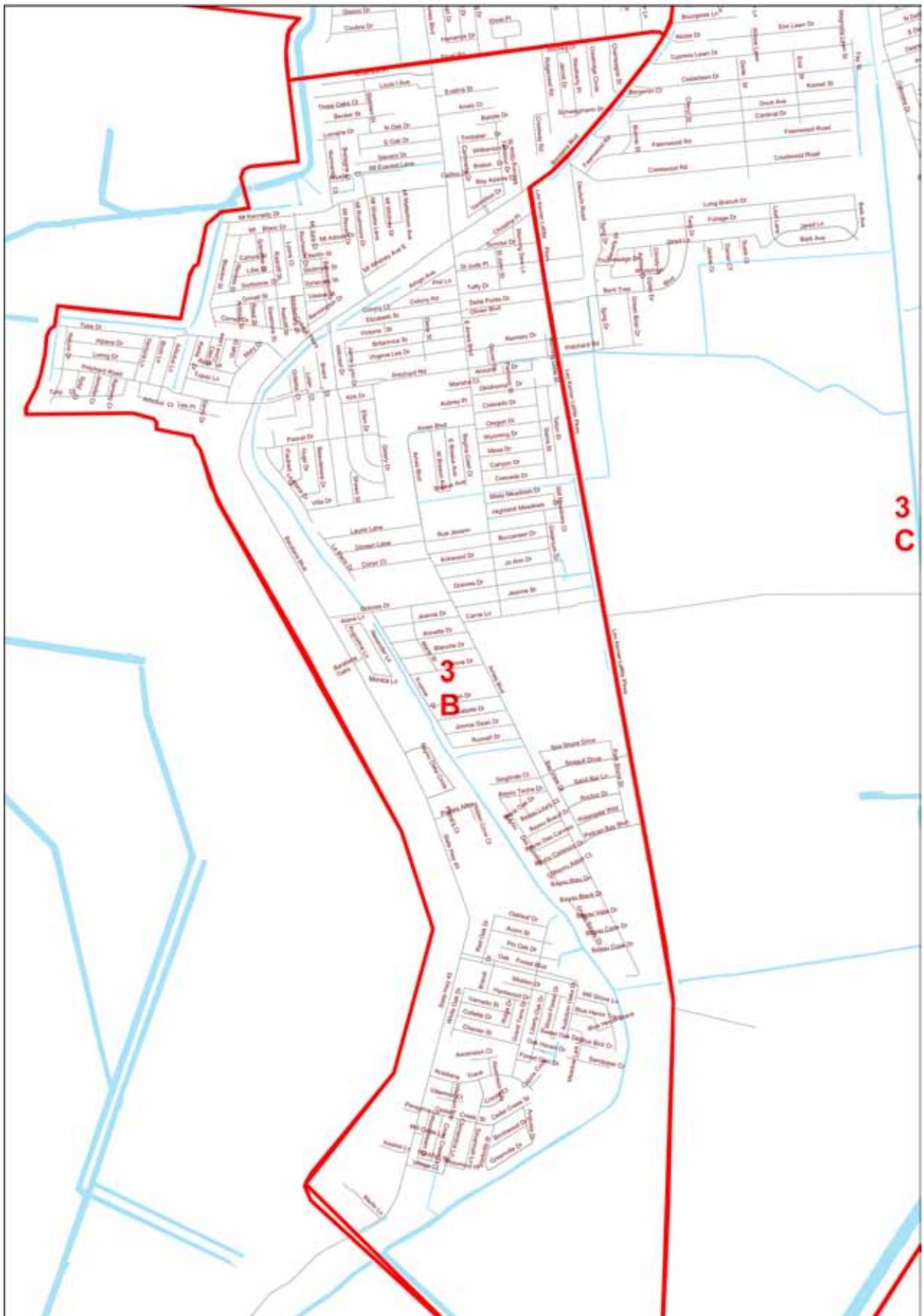




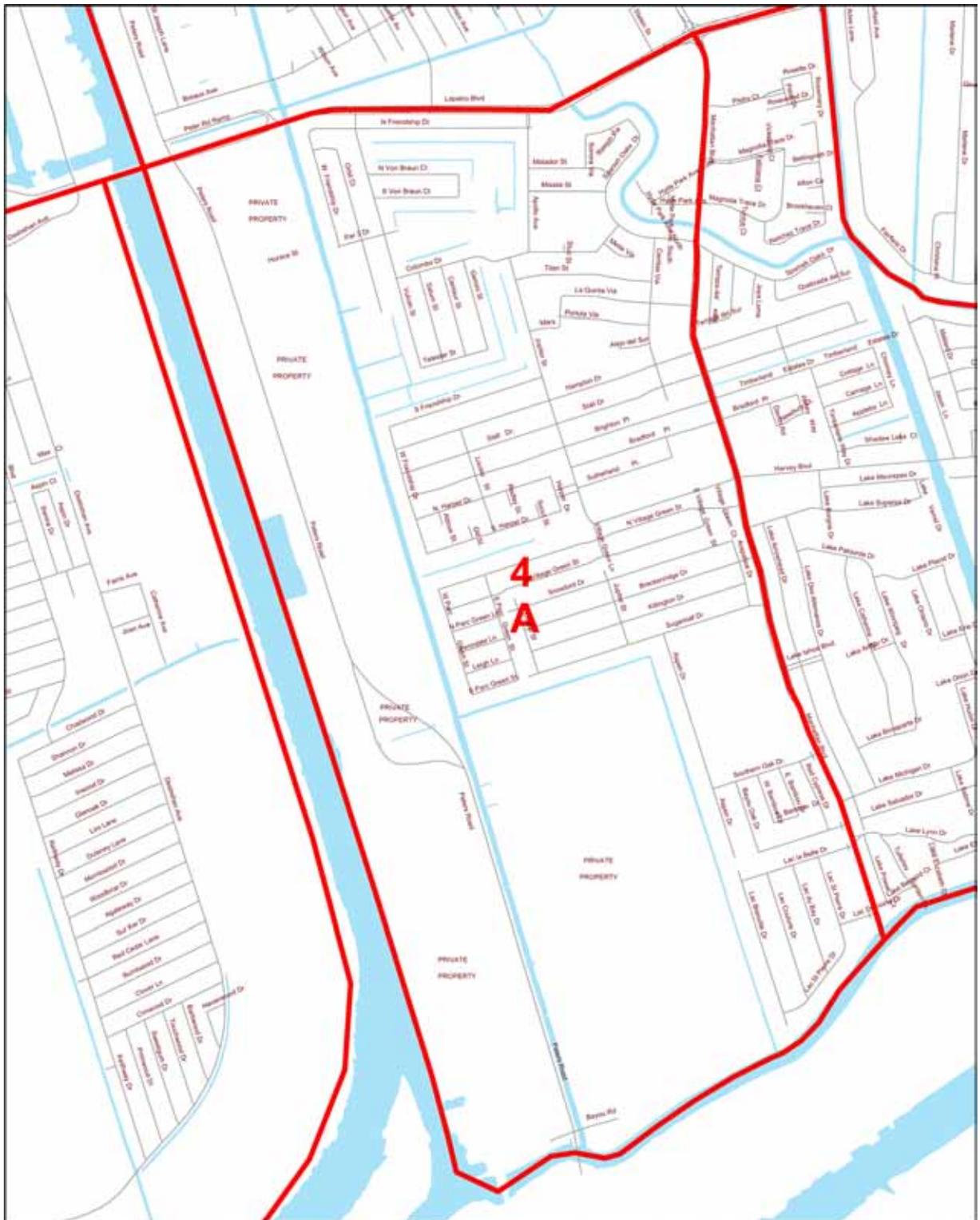


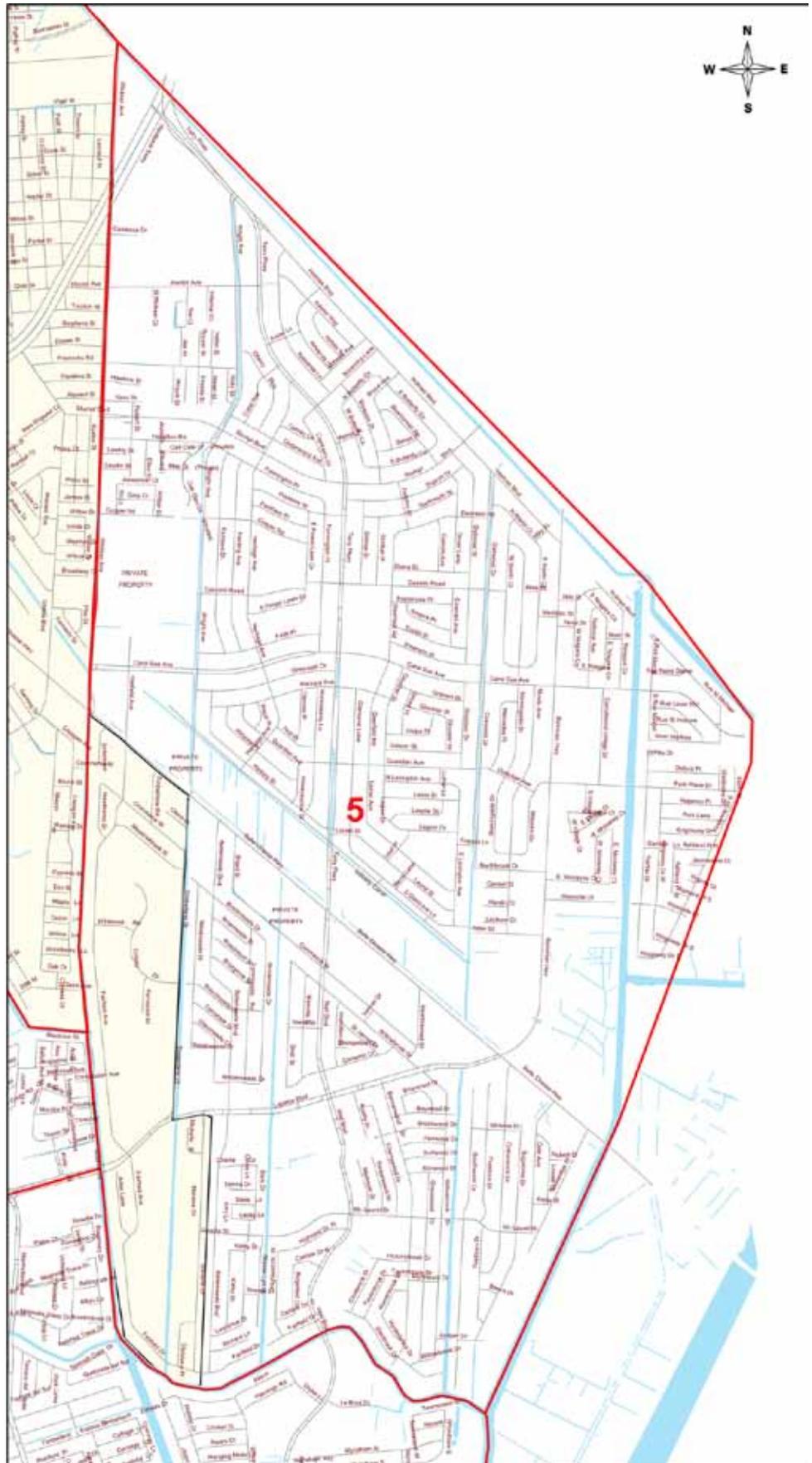


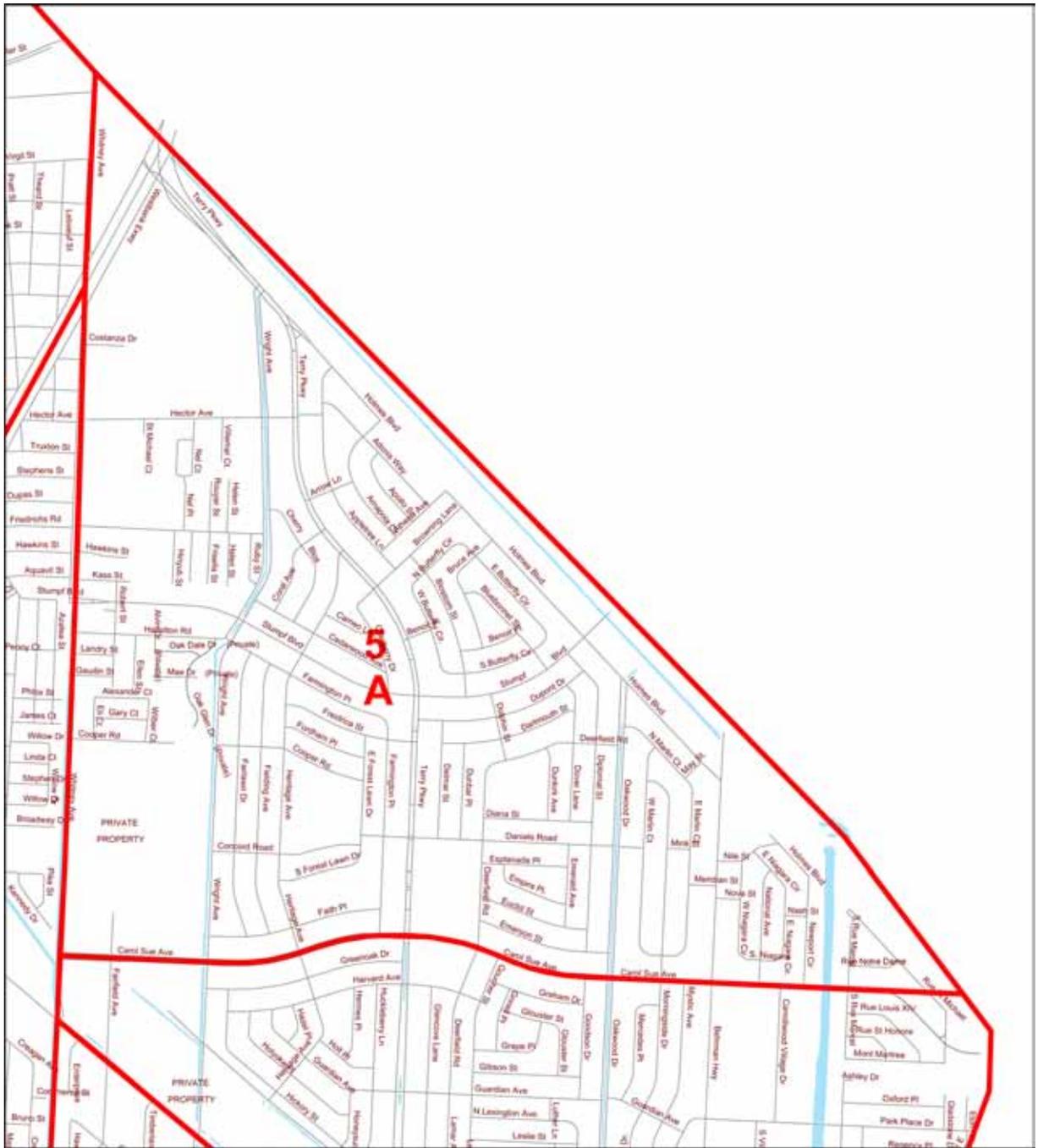


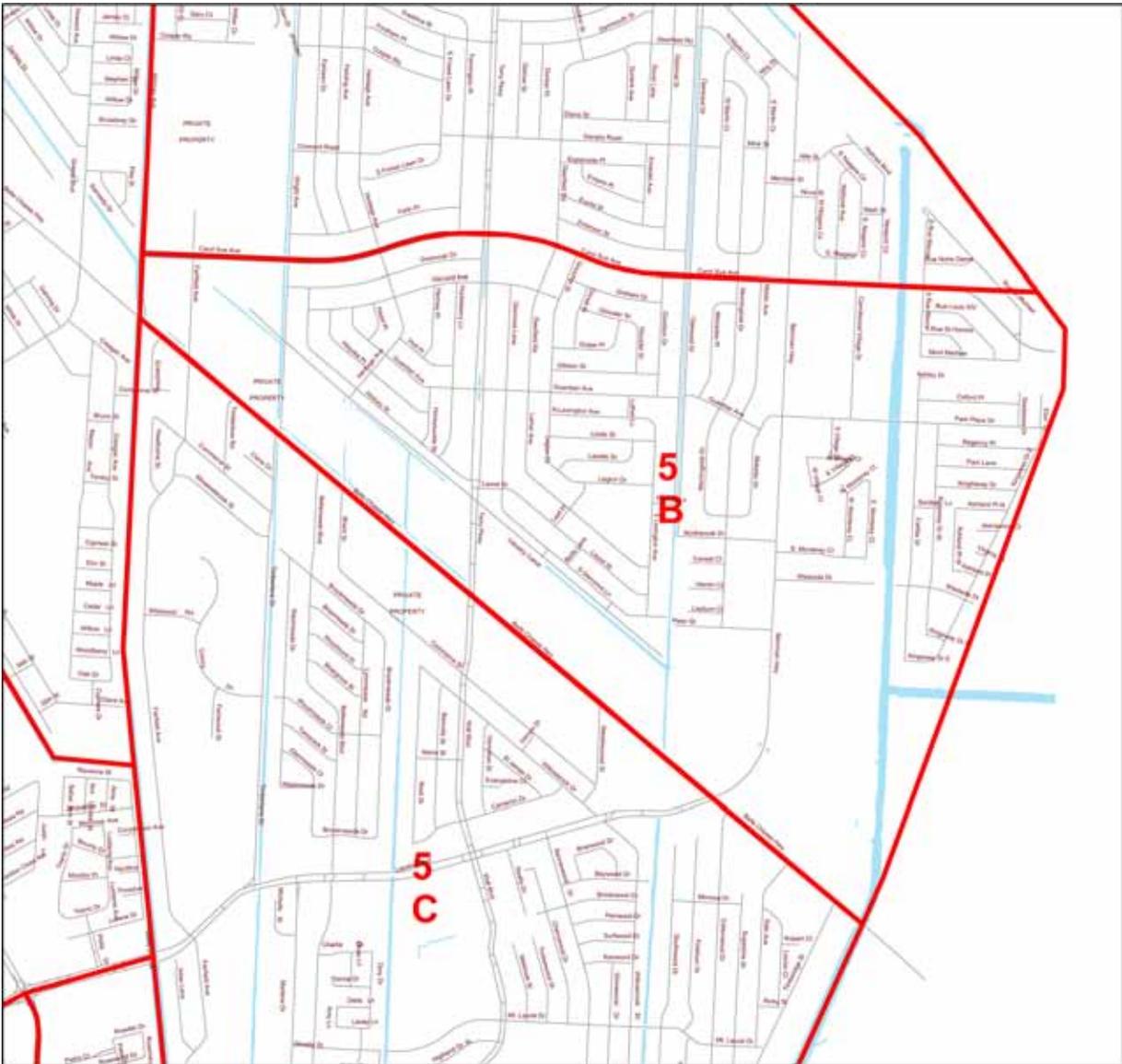


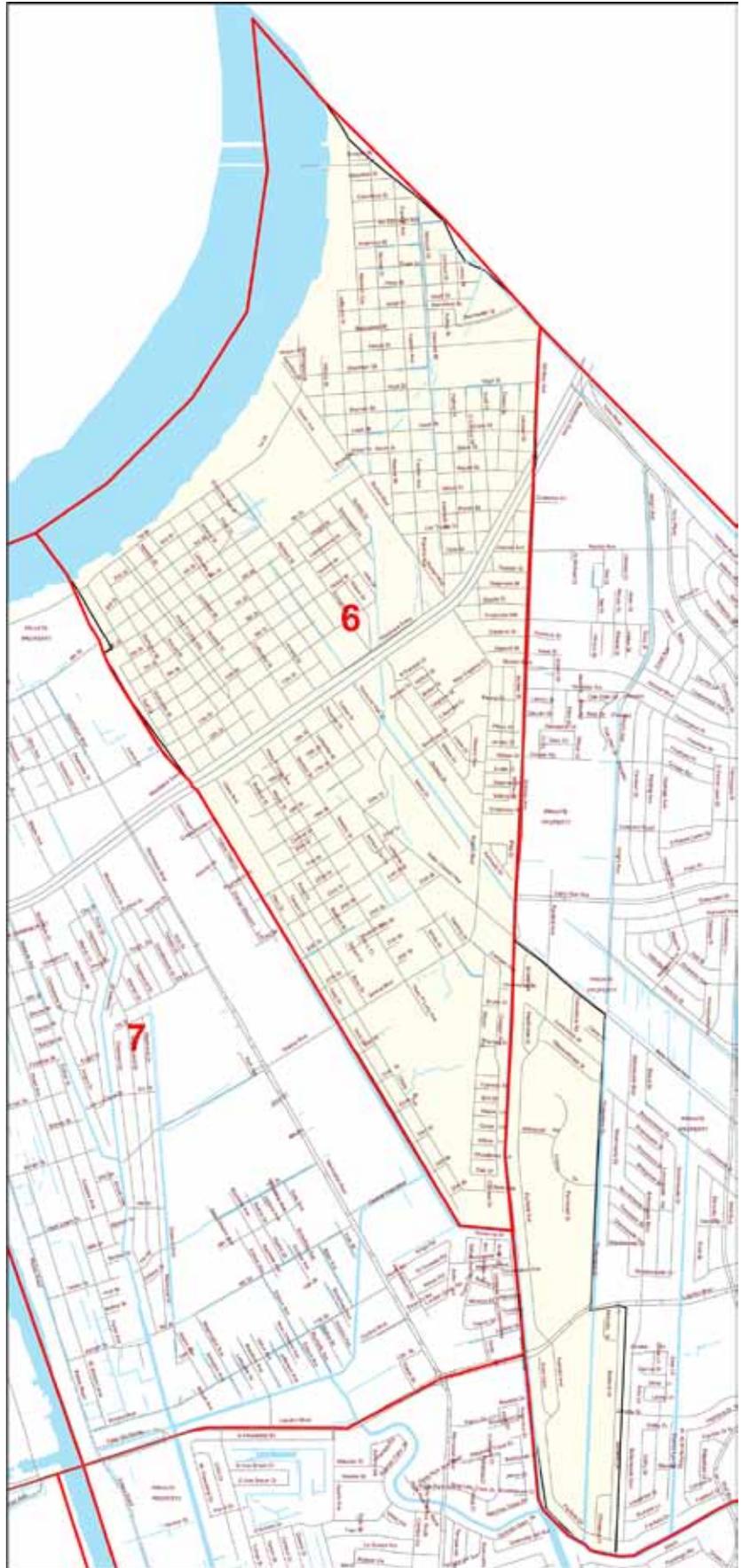


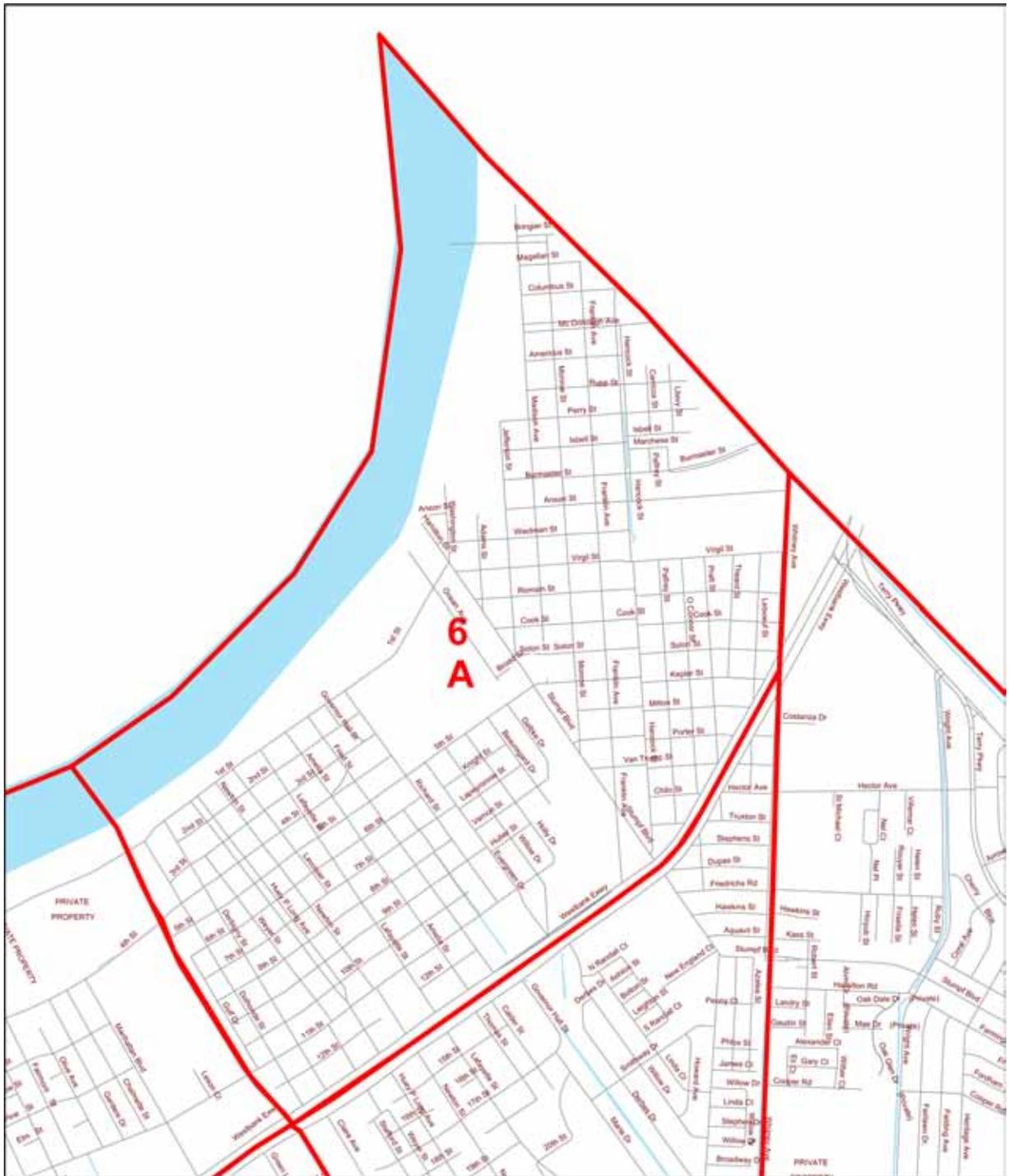


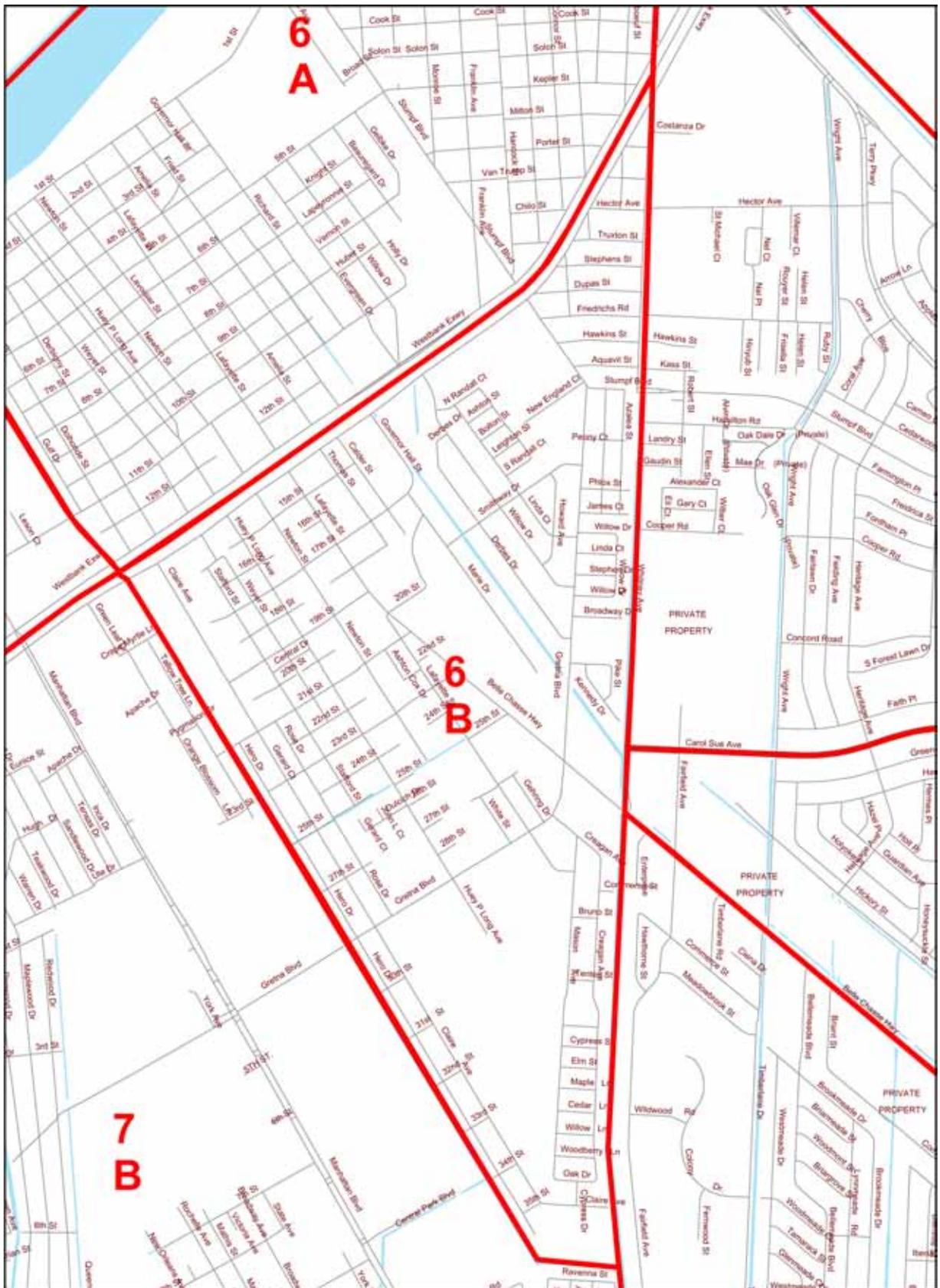






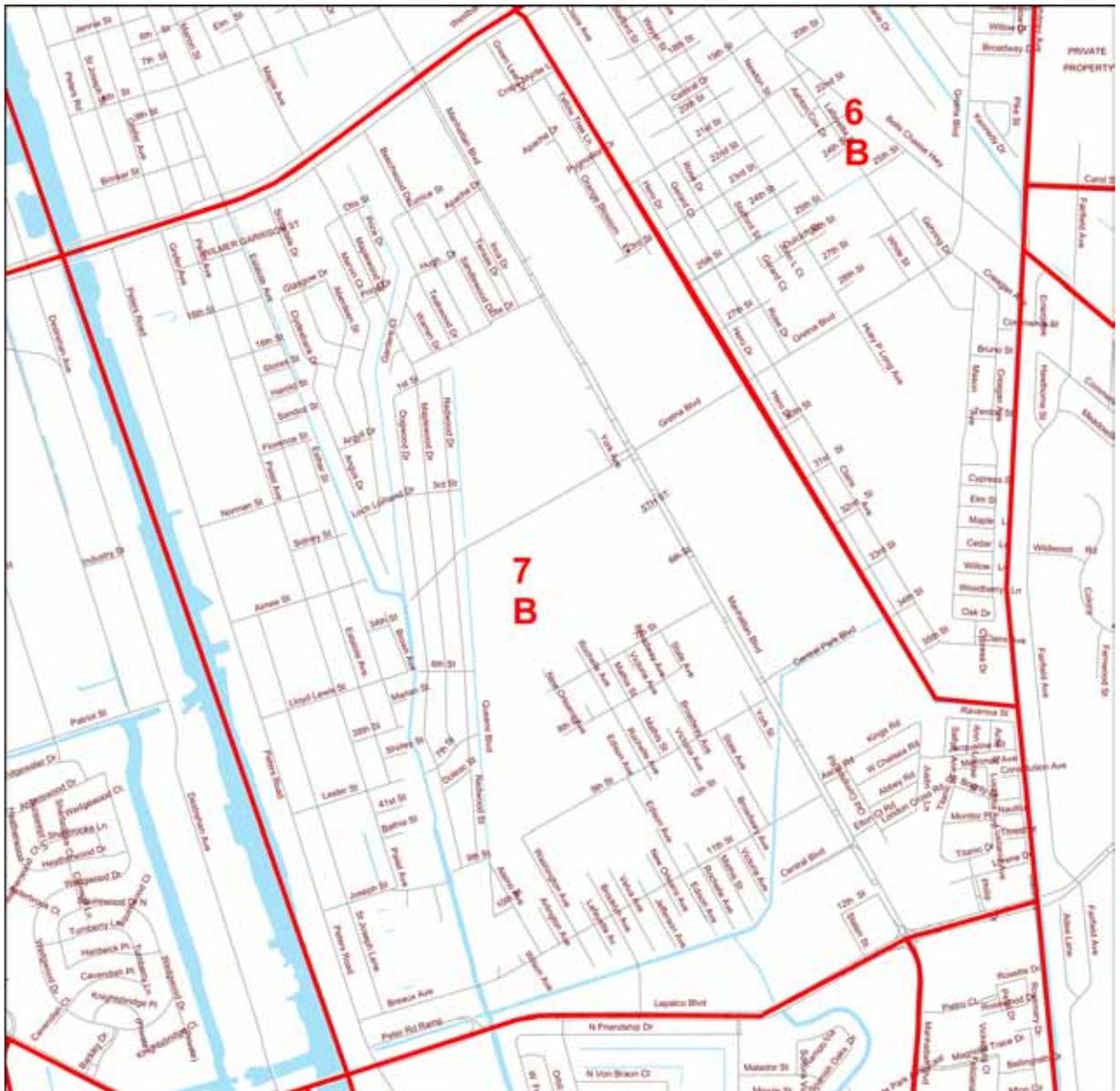






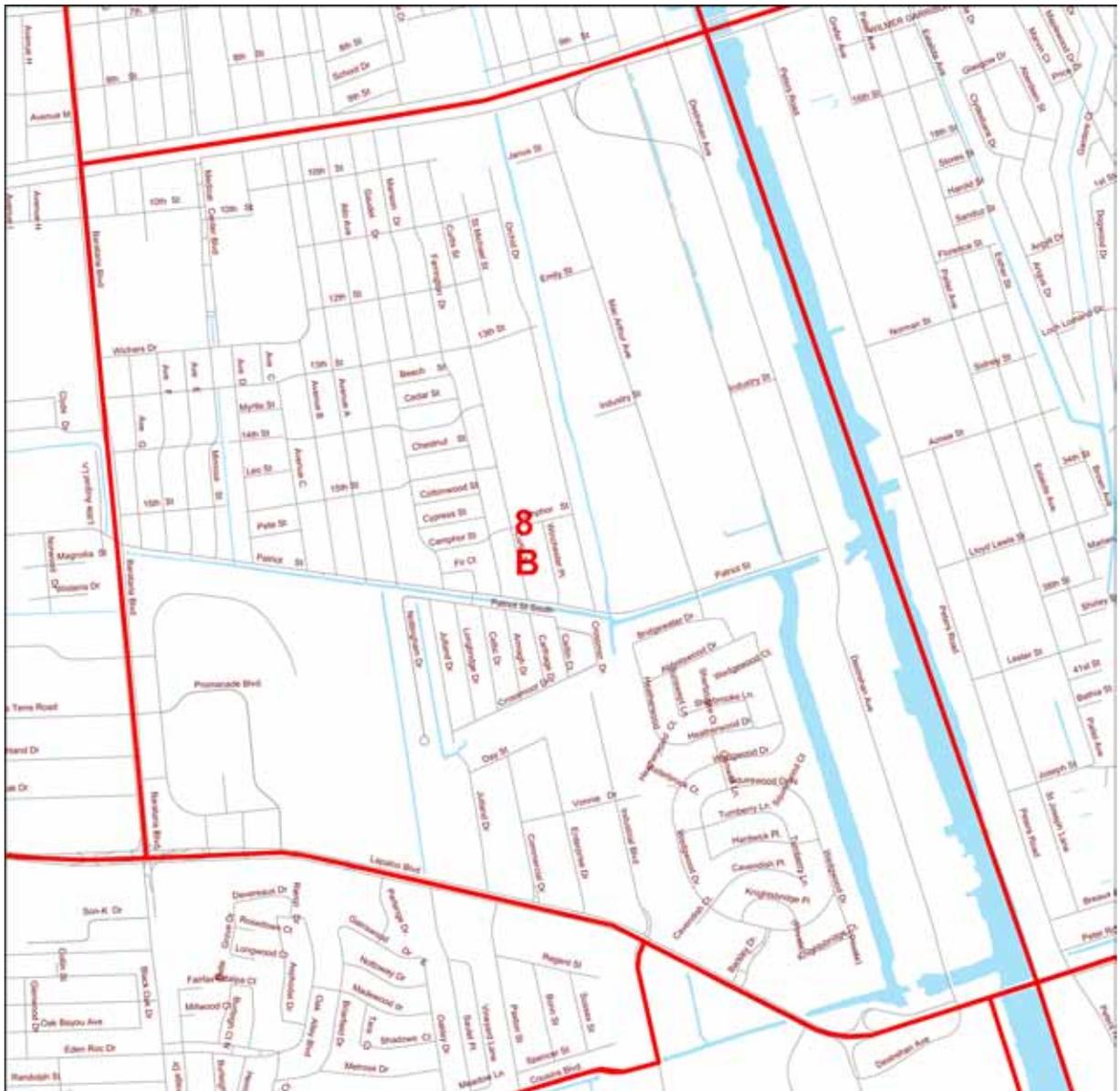


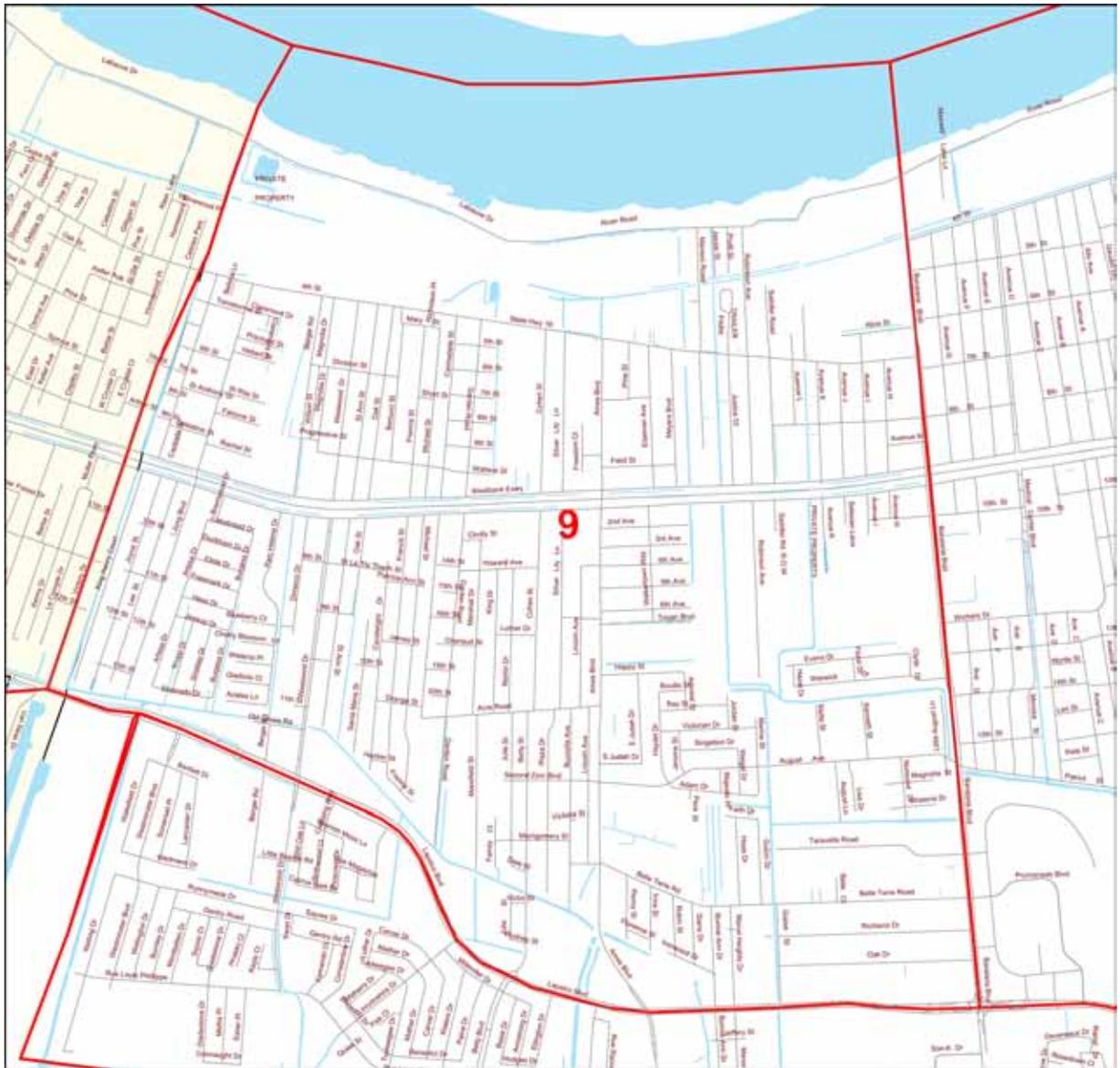




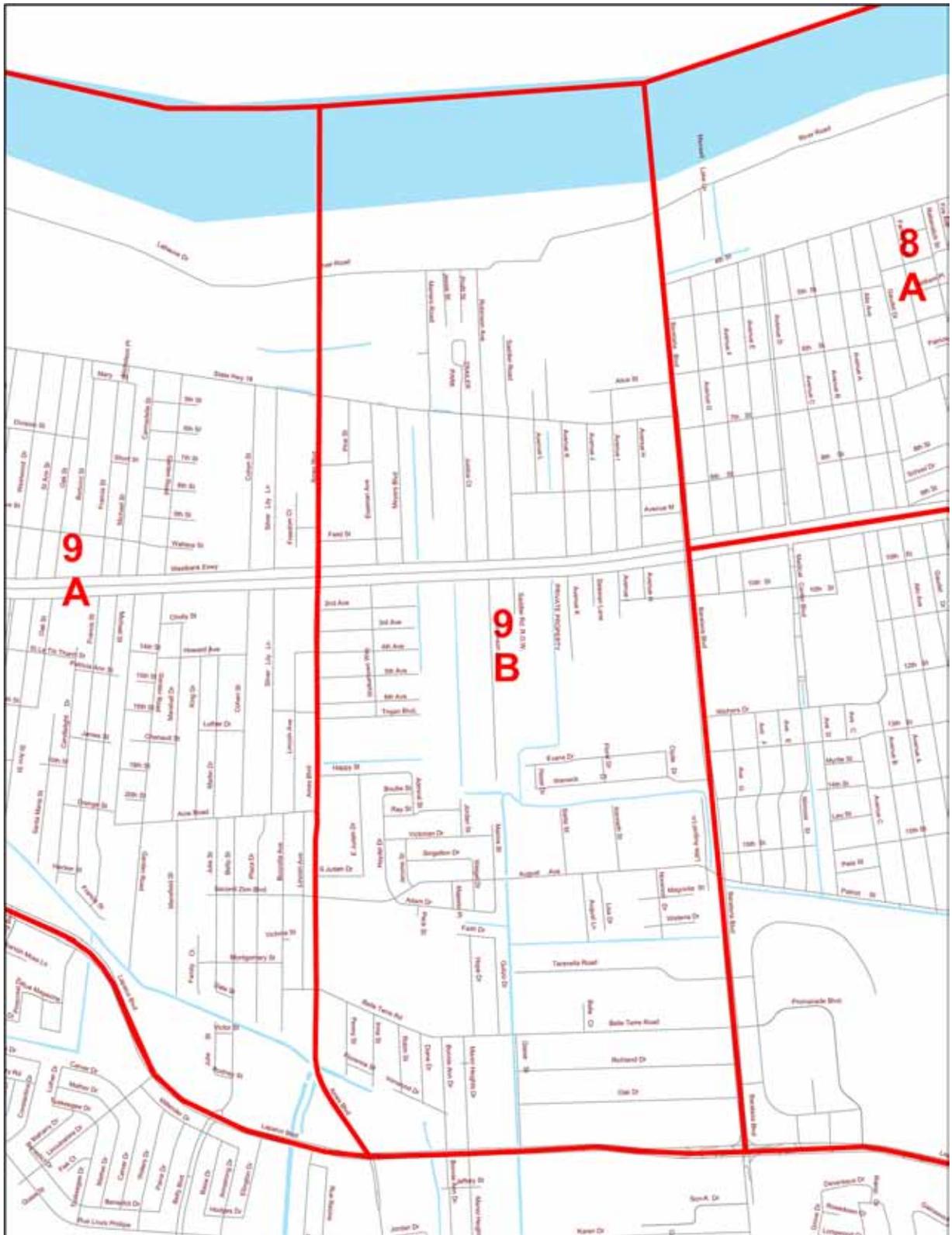


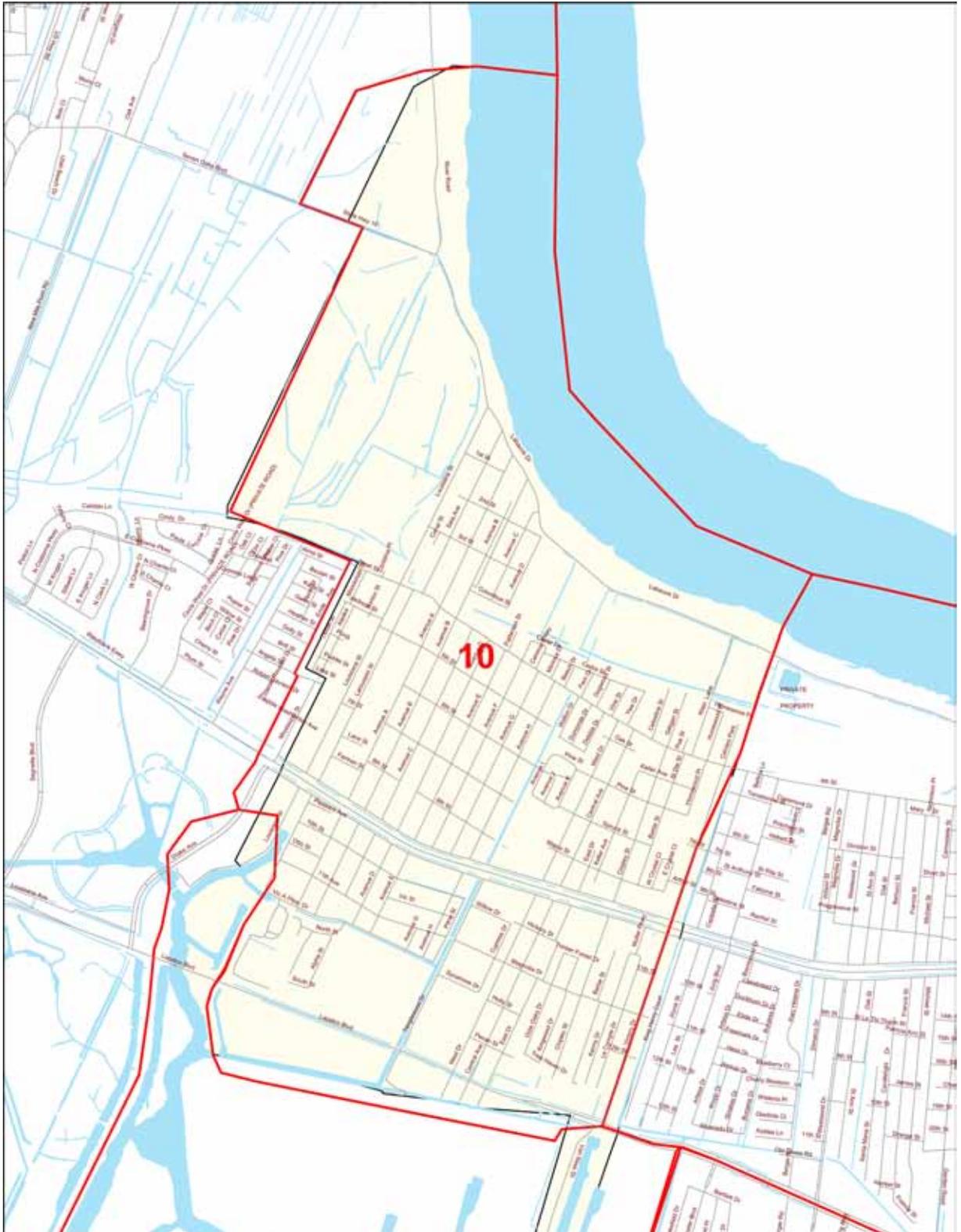


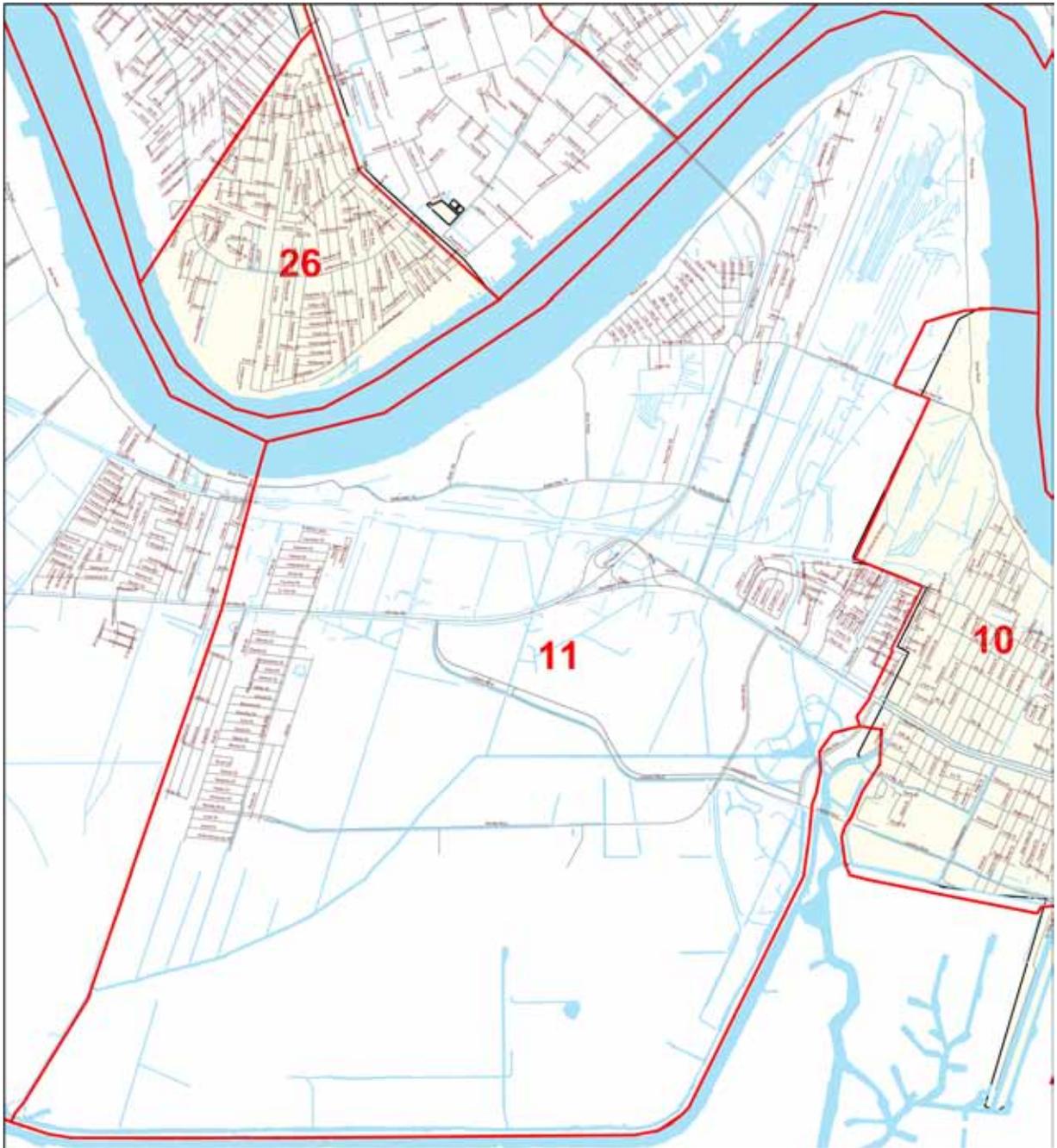


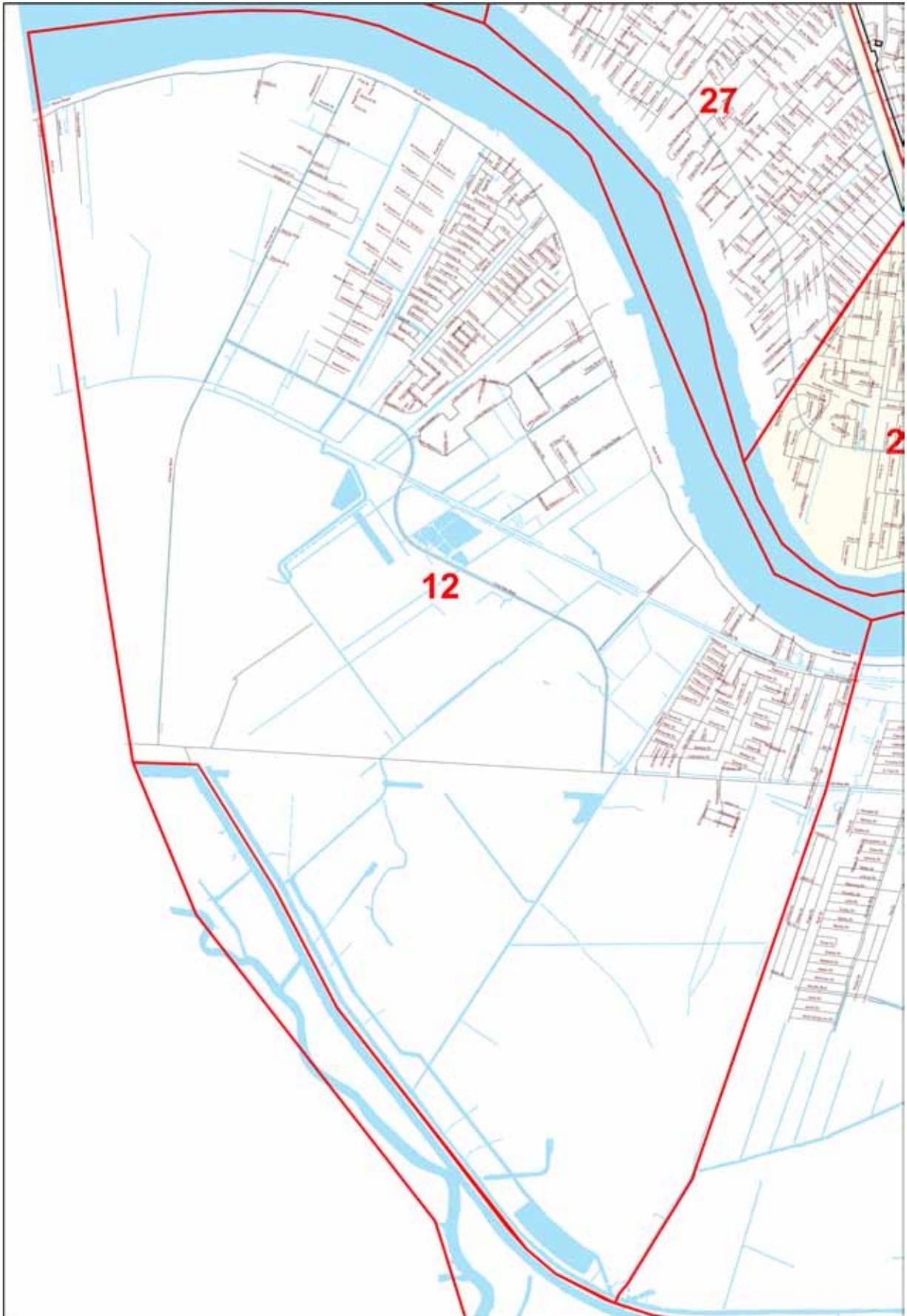




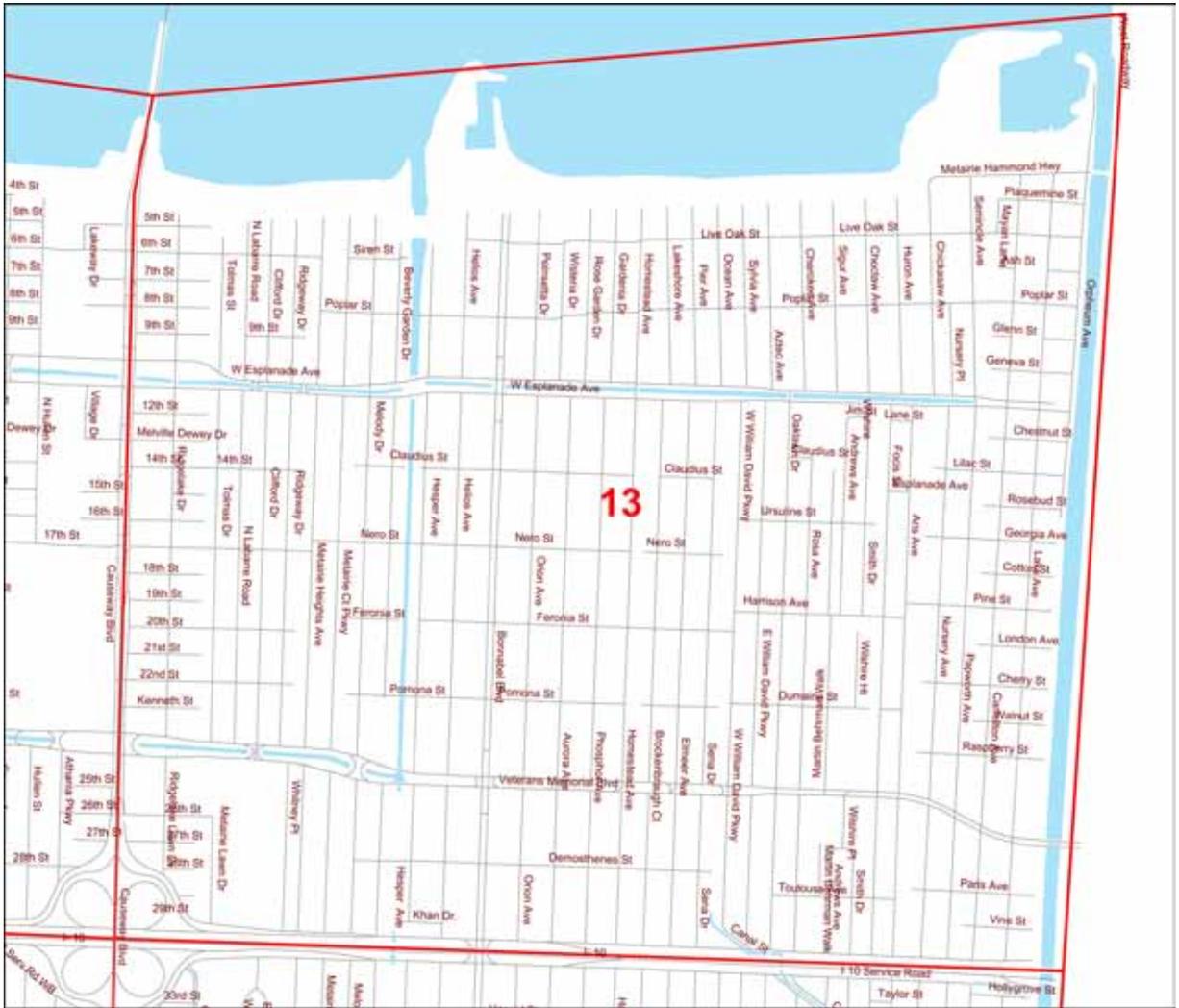








ZONE 13



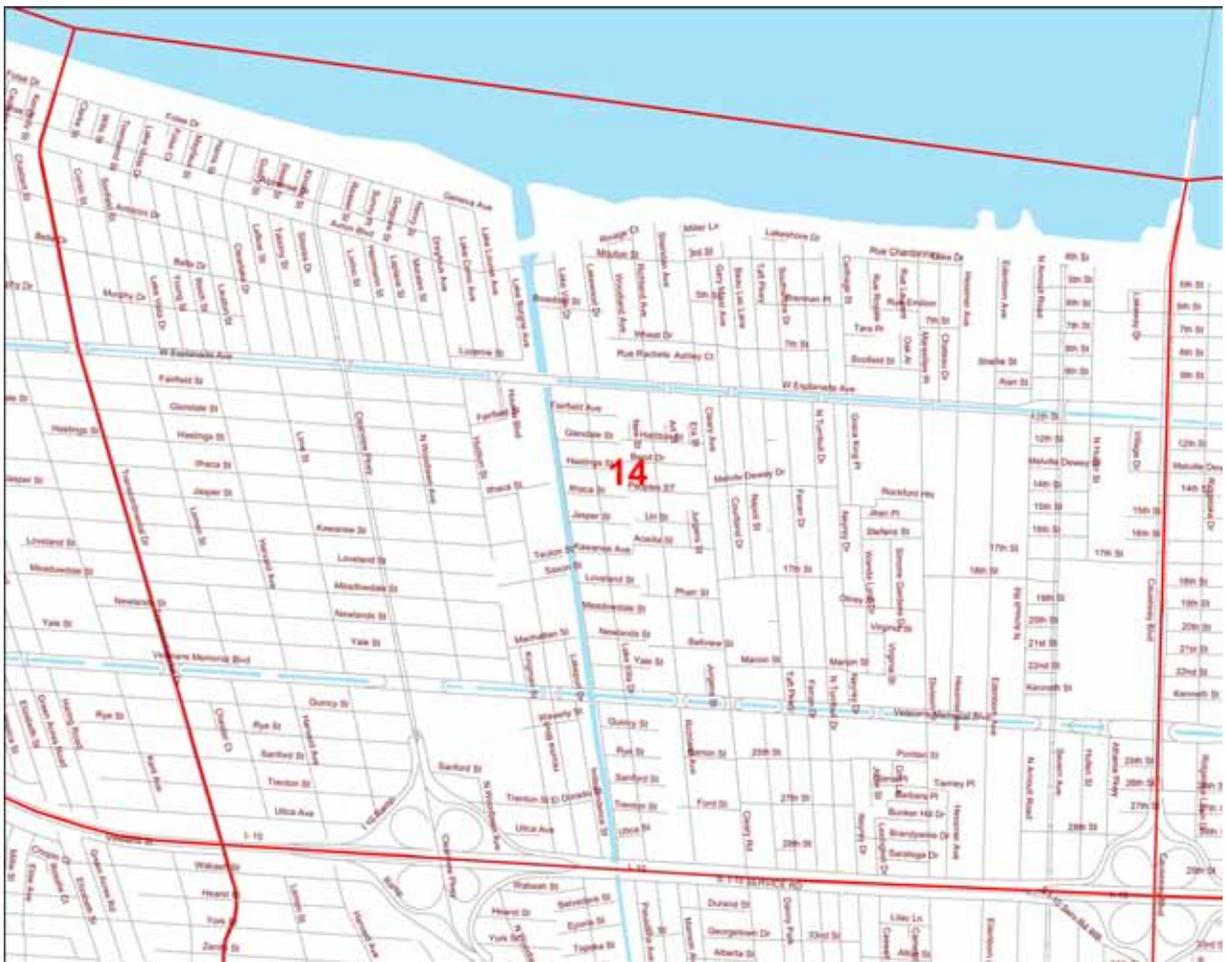
ZONE 13A



ZONE 13D



ZONE 14



ZONE 14A



ZONE 14B

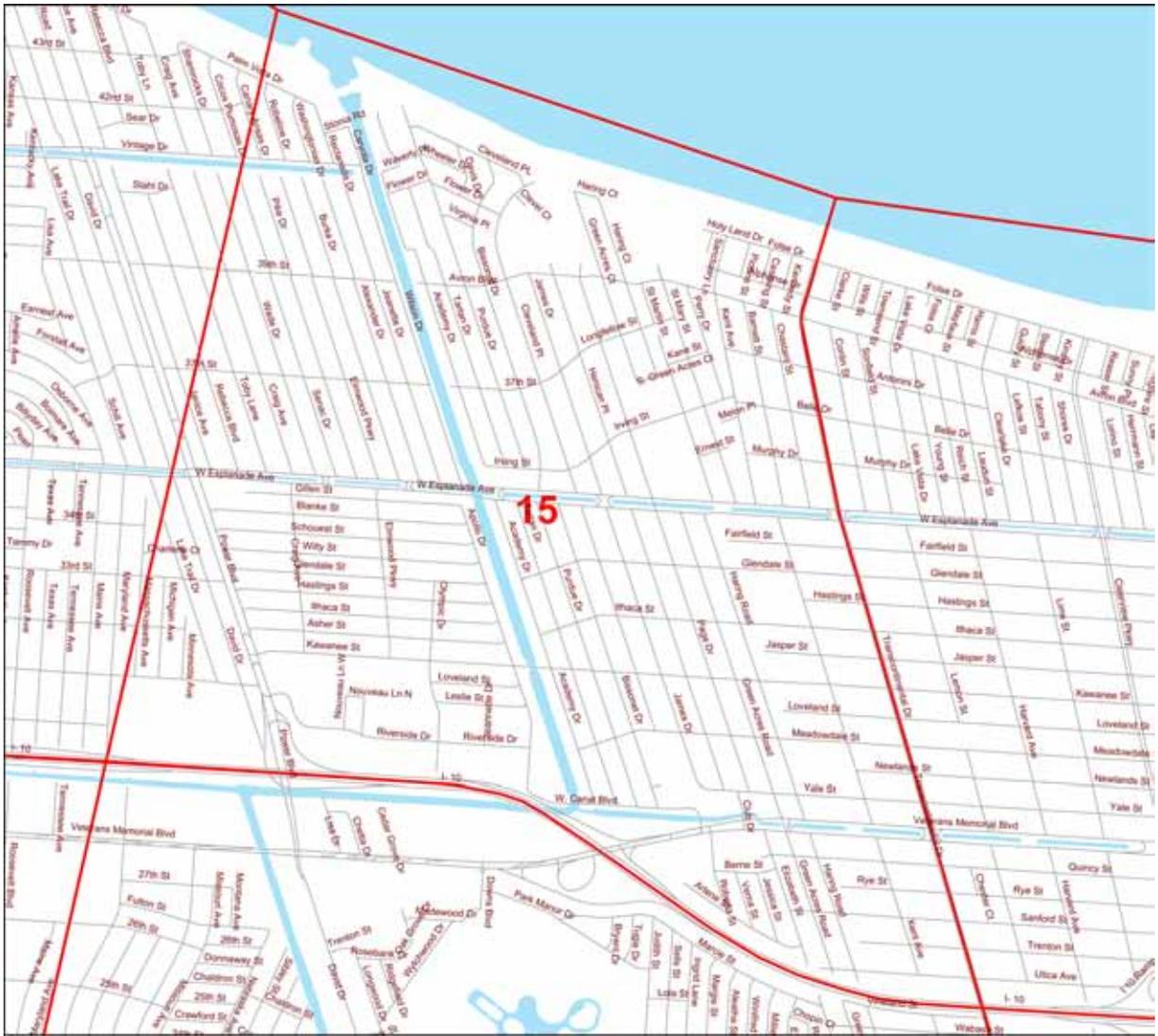


ZONE 14C



ZONE 14D

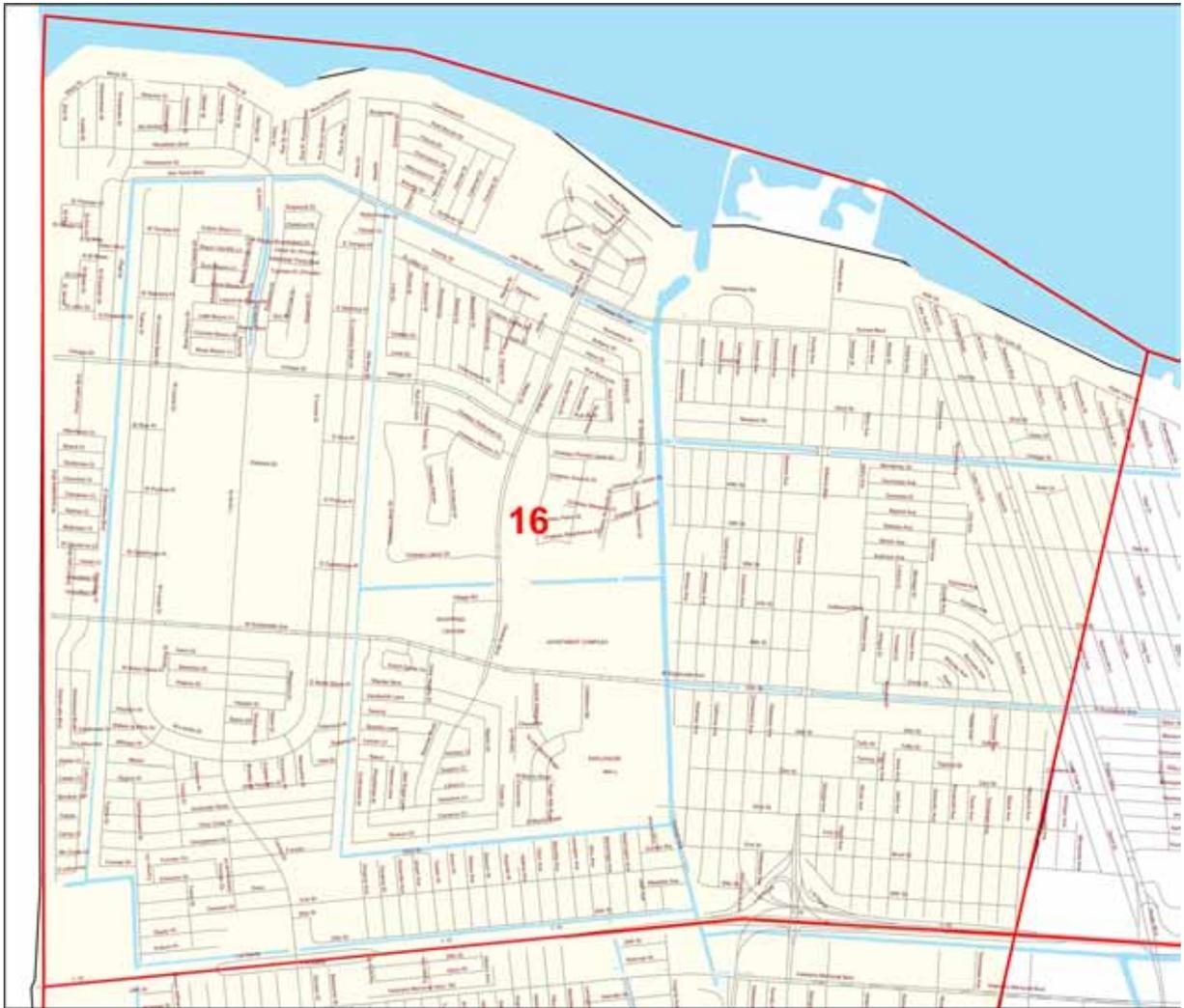














ZONE 19



ZONE 19A



ZONE 19B



ZONE 19C

