



City of Lake Charles CDBG-DR Action Plan
Louisiana Severe Storms, Tornadoes, and Flooding |
4606-DR-LA

ABSTRACT

City of Lake Charles Public Action Plan Abstract

This Action Plan explains how the City of Lake Charles proposes to use the \$17,818,000 in CDBG-DR and mitigation allocation it received from HUD to support the community's recovery from the May 2021 flood event and build resiliency. The Plan includes data on unmet needs, public participation, program budget, and all other HUD requirements for a public action plan.

AMENDMENTS

Non-Substantial Amendment 1 09/19/2023

Non-Substantial Amendment 1 for the upload of the Expenditure Projections Spreadsheet.

Initial 09/08/2023

Revised Action Plan- Incorporating revised language to address HUD comments and public comments.

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1. Executive Summary

Overview

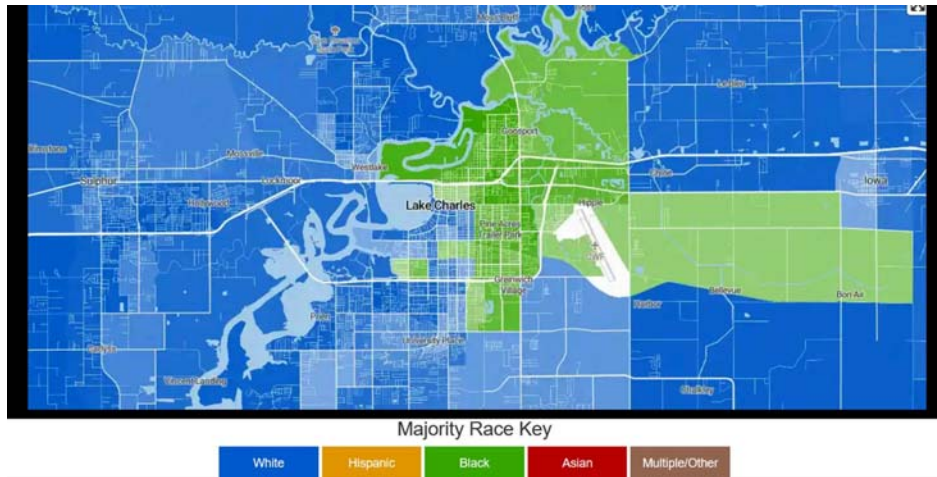
The U.S. Department of Housing and Urban Development (HUD) announced that the *City of Lake Charles* will receive \$17,818,000 in funding to support long-term recovery efforts following *flash flood event of May 17, 2021/Louisiana Severe Storms, Tornadoes, and Flooding 4606-DR-LA Incident Period: May 17, 2021 - May 21, 2021*, through the *the City of Lake Charles Department of Community Development, the lead agency and responsible entity for administering the Disaster Relief Supplemental Appropriations Act, 2022 (PL 117-43) CDBG-DR funds allocated for disaster recovery*. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in *Louisiana/the City of Lake Charles*.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$17,818,000 in CDBG-DR funds to the *City of Lake Charles/Louisiana* in response to *Severe Storms, Tornadoes, and Flooding, FEMA-4606-DR*, through the publication of the Federal Register, *Vol. 88, No. 11 / Wednesday, January 18, 2023 (Federal Register : Louisiana; Major Disaster and Related Determinations)*. [Notice is hereby given that, in a letter dated June 2, 2021, the President issued a major disaster declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 et seq. (the "Stafford Act"), as follows: I have determined that the damage in certain areas of the State of Louisiana resulting from severe storms, tornadoes, and flooding during the period of May 17 to May 21, 2021, is of sufficient severity and magnitude to warrant a major disaster declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 et seq. (the "Stafford Act"). Therefore, I declare that such a major disaster exists in the State of Louisiana.]. This allocation was made available through *the Disaster Relief Supplemental Appropriations Act, 2022 for major disasters occurring in 2020 and 2021. In March 2022, HUD allocated nearly \$3 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds. HUD allocated an additional \$1.447 billion in CDBG-DR funds appropriated by the Continuing Appropriations Act, 2023 for major disasters occurring in 2021. This Allocation Announcement Notice identifies grant requirements for these funds, including requirements in HUD's CDBG-DR Consolidated Notice ("Consolidated Notice") found in Appendix B, and some amendments to the Consolidated Notice that apply to CDBG-DR grants for disasters occurring in 2020 and 2021. The Consolidated Notice, as amended by this Allocation Announcement Notice (<https://www.govinfo.gov/content/pkg/FR-2023-01-18/pdf/2023-00721.pdf>), includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities. These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" (MID) areas resulting from a qualifying major disaster in 2021 or 2022. The 2023 Appropriations Act requires HUD to include with any final allocation for the total estimate of unmet need an additional amount of 15 percent of that estimate for mitigation activities that reduce risk in the MID areas. The 2023 Appropriations Act provides that grants shall be awarded directly to a state, local government, or Indian tribe at the discretion of the Secretary. To comply with requirements that all funds are expended in MID areas, Lake Charles, LA X must use 100 percent of the total funds allocated to address unmet disaster needs or mitigation activities within the HUD identified MID areas. Based on a review of the impacts from the eligible disasters, and estimates of unmet need, HUD made the following allocations for disasters occurring in 2021: Allocation for Unmet Needs under the May 24, 2022 Notice from Pub. L. 117-43 = \$9,370,000; CDBG-DR Mitigation Allocations for Mitigation Total Total Set-Aside Set-Aside amounts under the May 24, 2022 Notice from Pub. L. 117-43 = \$1,406,000; Allocations for Unmet Needs under this notice from Pub. L. 117-180 = \$6,123,000; CDBG-DR Mitigation Set-Aside for amounts under this notice from Pub. L. 117-180 = \$919,000; Total Allocated under this notice from Pub. L. 117-180 = \$7,042,000; Total Allocated under all notices from Pub. L. 117-43 and 117-180 = \$17,818,000.*

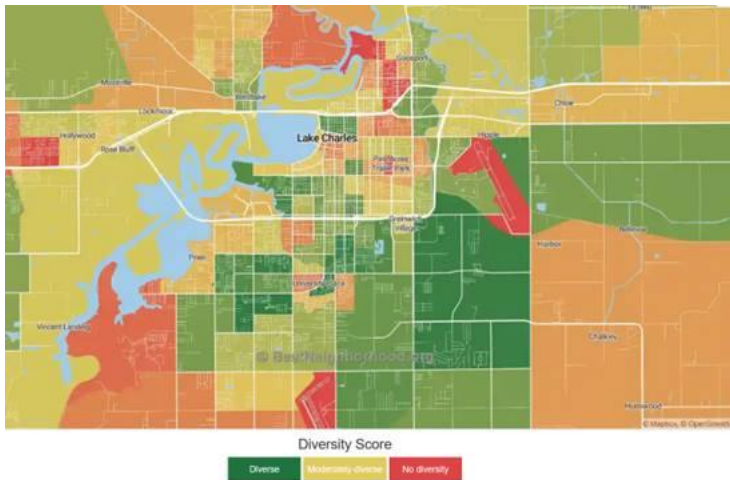
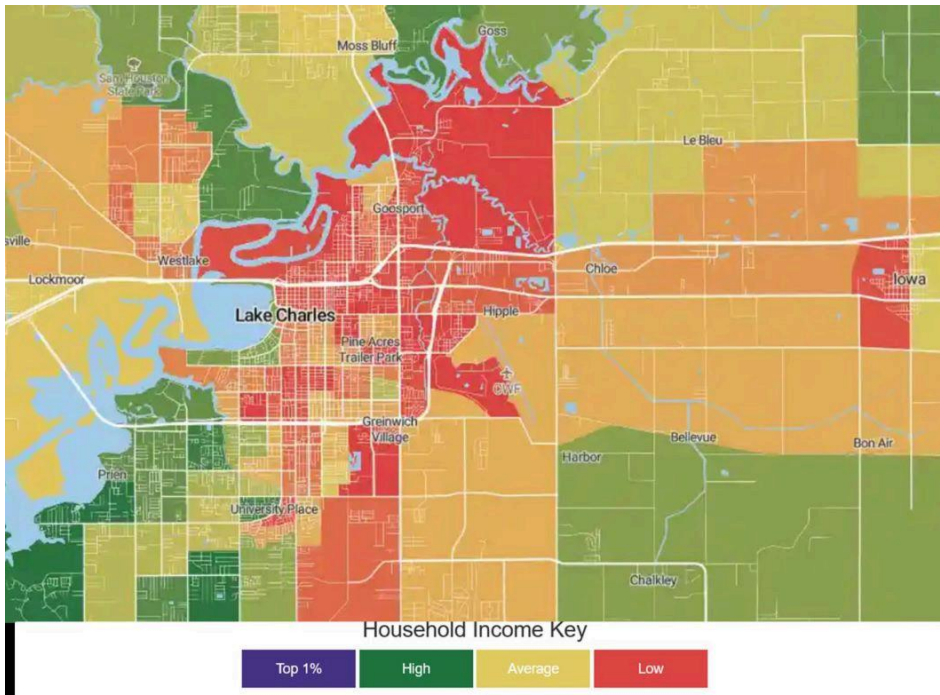
Lake Charles, founded in 1861, is located in Calcasieu Parish in southwestern Louisiana, and is the fifth-largest incorporated city in the state. It is a major industrial center in southwest Louisiana, with a significant presence in the petrochemical refining, tourism, gaming, and education sectors. It is home to McNeese State University and SOWELA Technical Community College. Due to its unique geography, metropolitan Lake Charles is known as the Lake Area. The City is located on a level plain about 30 miles from the Gulf of Mexico, on the banks of the Calcasieu River bordering Lake Charles and Prien Lake, with an average elevation of 13 feet above sea level. The city limits include portions of the English, Contraband, and Henderson bayous, while the man-made Calcasieu Ship Channel affords access to the Port of Lake Charles by large ocean-going ships. The City has a total area of 44.8 square miles, of which 42.0 square miles is land and 2.7 square miles is water (representing 6.12% of the total area).

The Lake Charles Metropolitan Statistical Area (MSA) has a population of 202,040 and is the larger principal city of the Lake Charles–Jennings Combined Statistical Area, which has a population of 225,235. The 2010 population of the five-parish area of Southwest Louisiana was 292,619. According to the most recent U.S. Census Quick Facts, as of July 1, 2021, the City's population was 81,097, having declined 5.1% since the April 1, 2020 count of 85,434. The residents are 43.9% non-Hispanic White, 2.1% White of Hispanic ethnicity, 47.9% Black/African-American, 0.2% Native/Alaskan American, 2.3% Asian, 0% Hawaiian/Pacific Islander, and 2.7% belonging to two or more races. The population was spread out in age ranges, with 27% under the age of 18; 8.5% from 20 to 24; 24.8% from 25 to 44; 25% from 45 to 64; and 14.1% 65 years of age or older. The median age was 35 years. For every 100 females, there were 90.9 males. The percentage of males was 45.7% versus 54.3% for females. Of the 33,093 households, the annual median household income was reported to be \$44,875, with 21.4% of the population living below the poverty line. The average home value was reported to be \$155,700, and average monthly rent was \$830. Education data indicate that 88% of the population possesses a high school diploma and 26.3% a bachelor's or higher degree.

The map below indicates the racial/ethnic majority composition of census blocks and tracts within Lake Charles. The map indicates that the majority of predominantly African-American neighborhoods are situated in the central, northern, southeastern, and eastern sectors of the City itself.



Similarly, with a diversity score of 79 out of 100, Lake Charles is more diverse than other US cities. The most diverse area within Lake Charles's proper boundaries is to the south of the city. The least diverse areas are located in the northwest parts of Lake Charles.



Lake Charles income is about average for the median income in the United States, with city household incomes in the 45th percentile. Education is usually most correlated with income, and in Lake Charles 25% of adults have bachelor's degrees or higher versus 31% nationwide. 54% of cities might have higher incomes, and 44% of locations would have lower household income. Compared to nearby cities family and household incomes are lower. Median income ranges from a low of \$12,875 to a high of \$132,584 in some neighborhoods. Higher income areas are typically found in the northwest parts of the city, and lower income areas are in the east areas. [Data Sources: U.S. Census, proprietary data mapping and analysis. Special thanks to the University of Virginia.]

As described below in this Action Plan, all proposed projects will benefit all income and program eligible beneficiaries living within Lake Charles. Physical construction of projects shall be in the northern and northeastern parts of the City which, as shown in the maps above, indicate a higher concentration of LMI persons, historically disadvantaged groups, and areas with a preponderance of historic economic disinvestments. Projects are proposed to meet national objectives (LMI) as well as to mitigate and remove blight simultaneously, thereby benefitting these marginalized areas.

The average annual precipitation of Lake Charles is one of the highest among U.S. cities, at 57.49 inches per year. This gives the City an elevated risk of flooding, compounded by its proximity to the Gulf of Mexico and its low-lying terrain traversed by lakes, bayous, and rivers. The most recent natural disasters in Lake Charles began with category 4 Hurricane Laura, which devastated the city on August 27, 2020. The National Weather Service called the storm surge “unsurvivable,” and it was accompanied by one-minute sustained wind speeds of 150 miles per hour (mph). The Lake Charles Regional Airport saw a gust of 128 mph, and other wind meters within the City reached 137 mph, or 220 kilometers per hour (km/h). The radar at the National Weather Service Lake Charles forecast office—whose staff evacuated, transferring the office’s operations to the Brownsville, TX office—was destroyed around the time of landfall, with its dome sheared from the radar tower’s base and much of its internal equipment destroyed. To compound the catastrophe, a few weeks later, Hurricane Delta also hit Lake Charles, causing extensive damage. In February of 2021, a severe winter storm burst pipes in many storm-damaged properties, crippling the municipal water system. Finally, in May 2021, an extra-tropical storm would unleash 16–18 inches of rain on Lake Charles in less than six hours, as described in the Disaster-Specific Overview Section of this Action Plan.

Disaster-Specific Overview

On Monday, May 17, 2021, the National Weather Service Weather Prediction Center highlighted parts of Texas, southeast Oklahoma, and much of Louisiana as having a “moderate risk” of flash flooding and excessive rainfall on Tuesday and Wednesday. About 30 million people were under flash flood watches, including those in cities like Dallas-Fort Worth, Austin, San Antonio, and Waco, TX; Oklahoma City, OK; Little Rock, AR; and New Orleans, Baton Rouge, and Lake Charles, LA. Soils in Louisiana were already saturated from multiple bouts of excessive rainfall over the preceding several weeks. To the east, New Orleans had recorded more than two feet of rain since the start of April, roughly three times the average amount. On that day, a historic 16-18 inches of rain fell over a six-hour period, causing an unprecedented “1,000-year” flash flood. This event flooded more structures in Lake Charles than flooded during Hurricanes Laura and Delta combined.

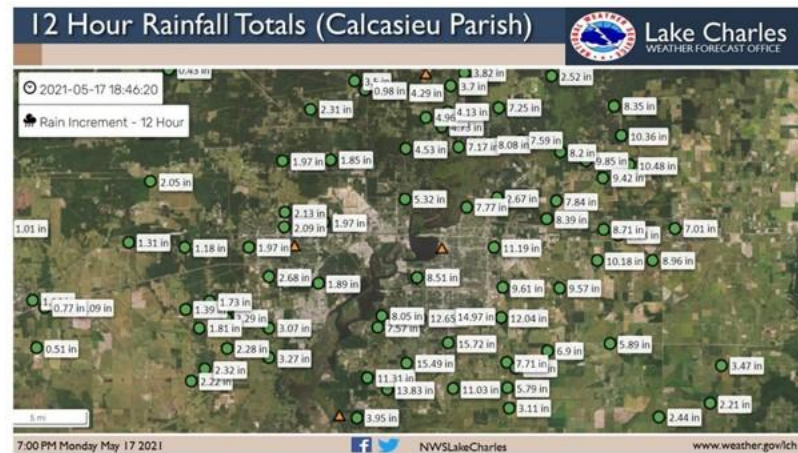


Figure 1: 12-Hour Rainfall Totals for Calcasieu Parish. Image is courtesy of the National Weather Service Lake Charles Office.

Local officials said that it was the third-highest daily rain event on record, dating back to the mid-1800s. A rain gauge near Contraband Bayou and McNeese Street that recorded 21 inches of rain may have set a “record amount for a one-day rain event” in the Parish, one official said. According to Richard “Dick” Gremillion, Director of the Calcasieu Parish Office of Emergency Preparedness, they anticipated that flooding would affect close to 3,000 housing units, based on flood insurance claims and damage claims filed online. Authorities rescued more than 80 people from floodwaters within the City and Calcasieu Parish, and they received more than 400 calls requesting high-water rescues. Flooded vehicles littered the City, which was still in the process of recovering from Hurricanes Laura and Delta. Four deaths were directly attributable to the flash flood event, and more than 500 residents were displaced from their homes. At the height of the storm, more than 2,600 customers of utility provider Entergy Louisiana lacked power. Because the storm hit during the course of a work and school day, many students were trapped in their schools, with parents and guardians unable to navigate the flooded streets safely to bring their children home. In many instances, teachers were required to carry their students through floodwaters to get them to their parents’ vehicles. Hundreds of residents sought temporary shelter at Trinity Baptist Church alone, which was just one site receiving storm survivors among many others doing the same throughout the devastated community.

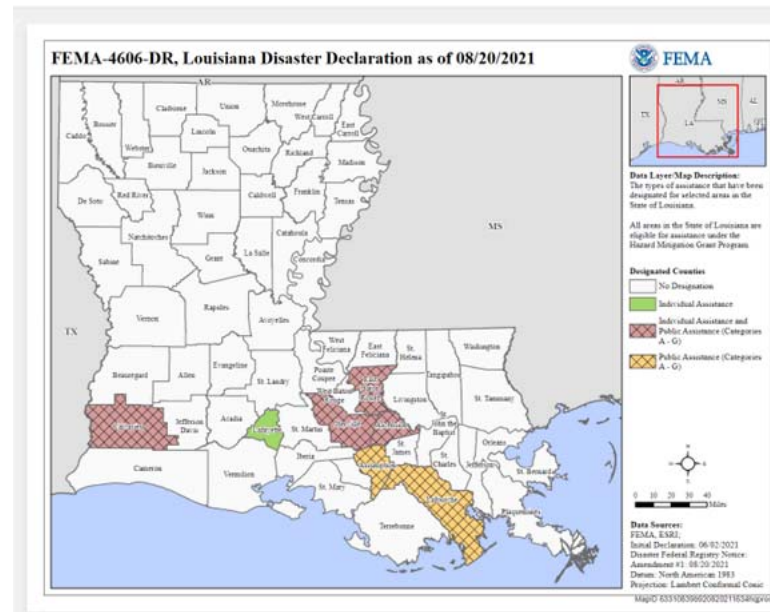


Figure 2: Louisiana Disaster Declarations for the May 2021 Flooding Event. *The image is provided courtesy of FEMA.*

To exacerbate the catastrophe, many dwellings outside of the 100-year floodplain were severely flooded. Many of these homeowners did not carry flood insurance, as they did not think that flooding would ever impact them. The May 2021 flood, combined with the ongoing recovery from Hurricanes Laura and Delta, made some residents consider leaving Lake Charles permanently. This is evidenced by the 5.1% decrease in population from April 1, 2020, to July 1, 2021.

The average annual precipitation of Lake Charles is one of the highest among U.S. cities, at 57.49 inches per year. This gives the City an elevated risk of flooding, compounded by its proximity to the Gulf of Mexico and its low-lying terrain traversed by lakes, bayous, and rivers. The most recent natural disasters in Lake Charles began with category 4 Hurricane Laura, which devastated the city on August 27, 2020. The National Weather Service called the storm surge “unsurvivable,” and it was accompanied by one-minute sustained wind speeds of 150 miles per hour (mph). The Lake Charles Regional Airport saw a gust of 128 mph, and other wind meters within the City reached 137 mph, or 220 kilometers per hour (km/h). The radar at the National Weather Service Lake Charles forecast office—whose staff evacuated, transferring the office's operations to the Brownsville, TX office—was destroyed around the time of landfall, with its dome sheared from the radar tower's base and much of its internal equipment destroyed. To compound the catastrophe, a few weeks later, Hurricane Delta also hit Lake Charles, causing extensive damage. In February of 2021, a severe winter storm burst pipes in many storm-damaged properties, crippling the municipal water system. Finally, in May 2021, an extra-tropical storm would unleash 16–18 inches of rain on Lake Charles in less than six hours, as described below.

As a result of Hurricanes Laura and Delta, the Winter Storm of 2020, and the flash flood event of May 17, 2021, the Lake Charles community is experiencing significant struggles:

- 56% of Lake Charles businesses are no longer active in 2021 vs. 2019.
- There has been a 14% enrollment decline in Calcasieu Parish Public Schools, according to the School Board.
- McNeese University and SOWELA Technical Community College experienced a 9% decline in enrollment.
- 60% of public housing is still offline.
- Overdose deaths increased 45% in 2020 compared to 2019.
- United Way 211 usage increased 284% in 2020 compared to 2019.
- Parcels with unpaid property taxes increased 270% in 2020 compared to 2019.
- The City anticipates a 9% decrease in property tax revenue.
- An estimated 8% of citizens (approximately 5,000 people) remain displaced.
- The City experienced an 833% increase in blighted properties (storm-damaged structures that have yet to be addressed). However, FEMA private property debris removal and demolition program will address this need, therefore, the CDBG-DR direct allocation to the City by HUD would be a duplicative effort.

Based on the State programs currently assisting this area as one of their MIDs, the City of Lake Charles will be focused on areas the State allocation does not directly address such as economic development, emergency shelter for future storm events, multifamily rental housing, and public facilities that enhance emergency response during disasters. The Louisiana Restore Homeowner's Assistance Program is addressing the needs related to homeownership assistance programs, such as repair, reconstruction, and buyouts.

On September 30, 2021, Public Law 117-43, entitled *Extending Government Funding and Delivering Emergency Assistance Act*, provided for an additional amount of \$5 billion for a Community Development Fund that would remain available until expended, for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed (MID) areas resulting from a major disaster that occurred in 2020 or 2021 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.).

On March 22, 2022, HUD allocated nearly \$3 billion in CDBG-DR funds appropriated by the Disaster Relief Supplemental Appropriations Act of 2022 for major disasters occurring in 2020 and 2021, including FEMA DR-4606-LA, the May 2021 Floods. This Allocation Announcement Notice identified grant requirements for these funds, including requirements in HUD’s CDBG-DR Consolidated Notice Appendix B, and some amendments to the Consolidated Notice that apply to CDBG-DR grants for disasters occurring in 2020 and 2021. The Consolidated Notice, as amended by this Allocation Announcement Notice, includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities. This notice also includes a modification to the February 3, 2022 Notice (87 FR 6364) that announced CDBG-DR grants for disasters occurring in 2020. Under this modification, the City of Lake Charles received a direct allocation of \$10,776,000. The Catalog of Federal Domestic Assistance (CFDA) numbers for the disaster recovery grants under this notice are 14.218 and 14.228.

On January 18, 2023, the City was notified of an additional direct HUD allocation in the amount of \$ 7,042,000 through Notice 88 FR 6368 meaning the City is awarded a total of \$17,818,000 in direct CDBG-DR and MIT allocation attributable to this specific disaster FEMA DR-4606-LA.

Summary

The City of Lake Charles (the City) developed this Action Plan with the ongoing participation and support of numerous City departments and community and stakeholder organizations, and in coordination with relevant federal and state entities. While the City of Lake Charles is the primary entity responsible for management of U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant–Disaster Recovery (CDBG-DR) funding, these participating organizations are essential partners that provide information throughout the planning process. They also help to ensure consistency with other local and regional planning efforts.

The City of Lake Charles will work closely with several key groups throughout the development and implementation of this Action Plan, including the Lake Charles Housing Authority, Volunteers of America, Calcasieu Council on Aging, Louisiana Housing Corporation, Louisiana Office of Community Development (OCD), Louisiana Governor’s Office of Security and Emergency Preparedness (GOHSEP), the American Red Cross, the Salvation Army of Lake Charles, the United Way of Southwest Louisiana, Calcasieu Workforce Development Board, SOWELA Technical Community College, McNeese State University, Lake Area Industry Alliance, the Calcasieu Parish Police Jury, the Chamber of Southwest Louisiana, Abraham’s Tent, Catholic Charities, La Familia Resource Center, and multiple non-profit housing developers. These groups bring a wealth of local knowledge and resources to the process, and they assisted with both the assessment of unmet needs and the development of the most effective recovery programs. These groups foster collaboration, ensure regional consistency, and will promote stakeholder engagement throughout the development of this Action Plan. Coordination with each of these groups also allows the City to establish open communication channels and relationships that will support the implementation of recovery activities.

The purpose of CDBG-DR grant funds is to address needs that remain unmet in a community following a disaster event. This Action Plan explains how the City proposes to use the \$17,818,000 in CDBG-DR and MIT (mitigation) allocation it received from HUD to support the community’s recovery from the May 2021 flood event and build resiliency.

Unmet Need and Proposed Allocation

| Category | Remaining Unmet Need | % of Unmet Need | Program Allocation Amount | % of Program Allocation |
|-------------------------|----------------------|-----------------|---------------------------|-------------------------|
| Administration | \$0.00 | 0.00% | \$890,900.00 | 5.00% |
| Planning | \$0.00 | 0.00% | \$1,781,800.00 | 10.00% |
| Housing | \$66,505,000.00 | 54.75% | \$4,145,000.00 | 23.26% |
| Infrastructure | \$31,684,253.00 | 26.08% | \$4,336,307.00 | 24.34% |
| Economic Revitalization | \$23,284,253.00 | 19.17% | \$3,991,293.00 | 22.40% |
| Public Services | \$0.00 | 0.00% | \$0.00 | 0.00% |

| Category | Remaining Unmet Need | % of Unmet Need | Program Allocation Amount | % of Program Allocation |
|--------------|-------------------------|-----------------|---------------------------|-------------------------|
| Mitigation | \$0.00 | 0.00% | \$2,672,700.00 | 15.00% |
| Total | \$121,473,506.00 | 100.00% | \$17,818,000.00 | 100.00% |

Data Source(s): Table 1: Allocations to Address Unmet Needs. Should other funds be made available in the future or other activities or budget allocations need to be added, removed or adjusted, the City will revise this table via an Action Plan Amendment. The Infrastructure row in this column includes Public Facilities. The Housing row includes single-family housing and public housing/affordable housing unmet need numbers. Public Services unmet needs will be addressed through the State Hometown Revitalization Program and the Resilient Communities Infrastructure Program and those amounts are already included in the Infrastructure and Economic Revitalization remaining unmet need cells of this table. The Public Services projects that will be funded through those programs are yet to be determined.

* Allocation Amount includes project delivery costs and does not include administration and planning costs.

2. Unmet Needs Assessment

Overview

The CDBG-DR program is considered a “gap” funding source, and is intended to help meet recovery needs not covered by other public and private funding sources. While recovery efforts have continued without interruption since May 17, 2021, many impacts remain unaddressed due to several primary factors. These factors include the profound extent and diversity of the damages to housing, infrastructure, and the economy; the unique conditions and vulnerabilities of Lake Charles’ residents and businesses; and the limitations of available funding assistance. The unmet needs assessment in Section 2.0 provides greater detail for how the City assessed information, to support the Table 1 allocation to the most impacted areas and populations. Program descriptions guiding its selection and development of the most effective recovery programs and priorities follows in the Grantee Proposed Use of Funds section of this Action Plan.

Table 2: Allocations to Address Unmet Needs. Should other funds be made available in the future or other activities or budget allocations need to be added, removed or adjusted, the City will revise this table via an Action Plan Amendment.

| Activity | Brief Synopsis | Proposed Use of Lake Charles direct CDBG-DR Allocation | Other Funding Sources Supporting Unmet Needs ^[2] |
|------------------------------------|--|--|---|
| Housing | Single-home repair, reconstruction, or elevation is being addressed by other funding sources. | \$0 | \$8,000,000 (Lake Charles Homeowner Major Rehabilitation Program) \$45,000,000 (Estimated Lake Charles specific Louisiana Voluntary Buyout Program and Louisiana Restore Housing Assistance Program) |
| Public Housing/ Affordable Housing | Construction of three low-to-moderate-income (LMI), one of which is age restricted, multifamily rental housing complexes. | \$4,145,000 | \$13,505,000 (LIHTC and conventional conforming Private mortgage sources) |
| Infrastructure | Addressed by other funding sources. | \$0 | \$23,284,253 (Lake Charles specific allocation through State Resilient Communities Infrastructure Program) |
| Public Facilities | Lake Charles Fire Department Campus | \$4,336,307 | See Mitigation category below \$5,000,000 (City of Lake Charles local funds) \$3,400,000 (FEMA funds) |
| Economic Revitalization | Development of non-profit disaster recovery center. Development of a small business incubator and resource center in north Lake Charles. | \$3,991,293 | \$23,284,253 (Lake Charles specific allocation through State Hometown Revitalization Program) |

| | | | |
|-------------------------------------|--------------------------------------|--------------|---|
| Public Services | Addressed by other funding sources. | \$0 | Portions of the already listed amounts in this column for the Lake Charles allocations through the State Hometown Revitalization Program and State Resilient Communities Infrastructure Program will go toward Public Service project(s). |
| Mitigation | Lake Charles Fire Department | \$2,672,700 | \$0 |
| Planning | 10% of CDBG-DR grant as per the cap. | \$1,781,800 | \$0 |
| Administration and Project Delivery | 5% of CDBG-DR grant as per the cap. | \$890,900 | \$0 |
| Total | | \$17,818,000 | \$121,473,506 (Total including actual committed and estimated funds) |

[2] Other funding sources may include Low-Income Housing Tax Credit (LIHTC), State of Louisiana CDBG-DR, FEMA, and private funding. This demonstrates both leverage of CDBG-DR direct City of Lake Charles' allocation as well as other funds that are being used to address all unmet needs.

As described earlier, Lake Charles experienced four major events within nine months, including Hurricanes Laura and Delta. This Action Plan is specific to the May 2021 Floods (DR-4606), and to the greatest extent practicable, we have based data and assessments on that event. However, the proximity of those four events, and their shared widespread impact on the community, require us to make this assessment within that broader context.

The City has based its estimates of unmet needs on the best available information as of October 2022, and represent the City's initial calculation of remaining recovery gaps. This assessment is thus a living document that we will update as additional information becomes available.

The City has estimated its unmet needs by comparing the financial impacts of the qualified disaster event with the subsequent recovery funding that has been received or is anticipated. This assessment incorporates data from the following key sources:

- Federal Emergency Management Agency (FEMA) Individual and Household Assistance Program (IHP)
- FEMA Public Assistance (PA) Program
- Small Business Administration (SBA)
- National Flood Insurance Program (NFIP)
- City of Lake Charles departmental reports and studies
- United States 2020 Decennial Census
- 2019 American Community Survey (ACS)
- HUD Comprehensive Housing Affordability Strategy (CHAS) datasets
- Public and stakeholder outreach and feedback

This assessment is organized into three main categories: housing, infrastructure, and economic development. Identifying and documenting the needs across these three core areas allows the City to allocate limited resources strategically to address the most critical recovery needs, while also making proactive investments in resilience to minimize the impacts of future flood events.

The City has also taken alternative pre-existing state disaster funding sources into account (see Table 2 below). While the most significant sources are statewide, may be competitive across parishes or require applicant initiative, they are currently available and underway within the City. The City determined that these housing programs and other investments have sufficient allocations from the State at this time. Should additional needs or waitlists arise; the City will coordinate with the State on whether additional allocations are best served through the state allocation or may need a reallocation of any underutilized or available funding in this Plan. In addition, we are likely to continue to identify other sources of funding, or additional data for existing programs may become available. Therefore, this list is intended to be illustrative, not comprehensive or final.

Table 3: Alternative Funding Sources. *The source is the State of Louisiana Substantial Action Plan Amendment No. 3 for the 2020 and 2021 federal declarations.*

| Program | Agency | Purpose | Allocation |
|--|----------------------|---|-------------|
| Homeowner Major Rehabilitation Program | City of Lake Charles | Forgivable loans for major home repair/rehabilitation | \$8,000,000 |

| Program | Agency | Purpose | Allocation |
|--|--|--|---------------|
| Statewide Buyout Program | Louisiana Office of Community Development/Louisiana Watershed Initiative | Voluntary Buyout in Disaster Risk Reduction Area | \$100,000,000 |
| Restore 2020-2021 Housing Assistance Program | Louisiana Office of Community Development | Housing | \$867,873,287 |
| Restore 2020 | Louisiana Office of Community Development | Infrastructure | \$232,833,641 |
| Restore 2020 | Louisiana Office of Community Development | Economic Revitalization | \$120,695,232 |

Housing Unmet Needs

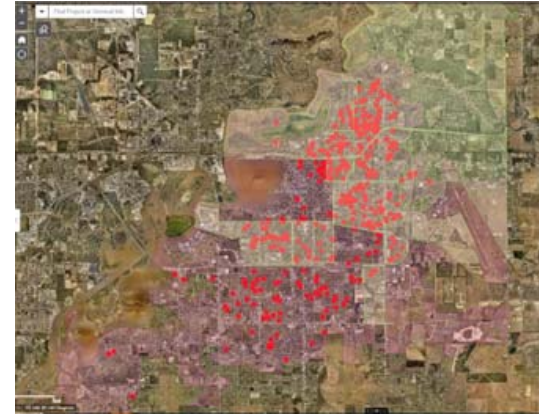
Some portions of the following data represent statewide numbers and are not specific to Lake Charles or surrounding Calcasieu Parish. We can reasonably extrapolate from the fact that the impacts were primarily on Lake Charles/Calcasieu Parish and East Baton Rouge Parish that approximately 20–25% of the aggregate dollar figures outlined in statewide sources should represent an approximation of the actual figure applicable to the City of Lake Charles. In other words, a portion of the unmet needs in Lake Charles is already identified in the State Action Plan and addressed through some of the State program allocations such as the Restore Louisiana Homeowner Assistance Program, Resilient Communities Infrastructure Program, and the Hometown Revitalization Program. Therefore, this needs assessment is considerate of two grantees assessing the same information and running programs in the same areas concurrently.

Disaster Damage and Impacts

The map in the text box below illustrates the roughly 350 housing units the city has identified as damaged by the event. Over 85% of critically damaged units are in LMI areas, with greater than 20% experiencing poverty.

Housing Loss Highest in LMI Areas

- The green shade HUD-represents Qualified Census Tracts.
- The red squares represent single-family houses impacted by the storm and in review for condemnation.
- Over 85% of critically damaged houses are in LMI areas with more than 20% poverty.
- Data source: City of Lake Charles Occupational License Data (September 2021), City of Lake Charles Building Safety



As shown in Table 4 below, and according to *The Economic Impact of the May 17–21 Floods on the State of Louisiana*, a report commissioned by Louisiana Economic Development, Calcasieu Parish had the largest number of housing units damaged by the event. The lower damage costs are due to lower property values in comparison to East Baton Rouge Parish. The estimates of units, however, is in line with numbers provided by the City. Available preliminary data from the City shows that almost 350 residential properties (340 single-family units and 6 multi-family units) in the City are likely to be condemned and demolished. By comparison, in a normal year, the City would condemn and demolish 20–25 residential properties. Out of these properties, 85% of the structures are in areas where the poverty rate is above the national average. The multi-family properties are all in areas with poverty rates greater than 30%.

The State's Restore Louisiana Homeowner Assistance Program is offering affected homeowners in Lake Charles the following options: home repairs, home reconstruction, mobile home replacement, mobile home repairs, and reimbursement for repairs completed.

Table 4: Residential Property Damage. *Data for this table comes from The Economic Impact of the May 17–21 Floods on the State of Louisiana.*

| Parish | Residential Housing Structures | Damage (Millions) | Percent of Total Structures | Percent of Total Damage |
|--------------------|--------------------------------|-------------------|-----------------------------|-------------------------|
| Calcasieu | 1,300 | \$49.5 | 43% | 33% |
| East Baton Rouge | 1,250 | \$73.6 | 41% | 49% |
| All other Parishes | 500 | \$27.2 | 16% | 18% |
| Total | 3,050 | \$150.3 | 100% | 100% |

The map in Figure 3 below also illustrates how widely flooding occurred in the community, where it had an impact not only on homeowners of various income levels, but on many large and small commercial interests as well.

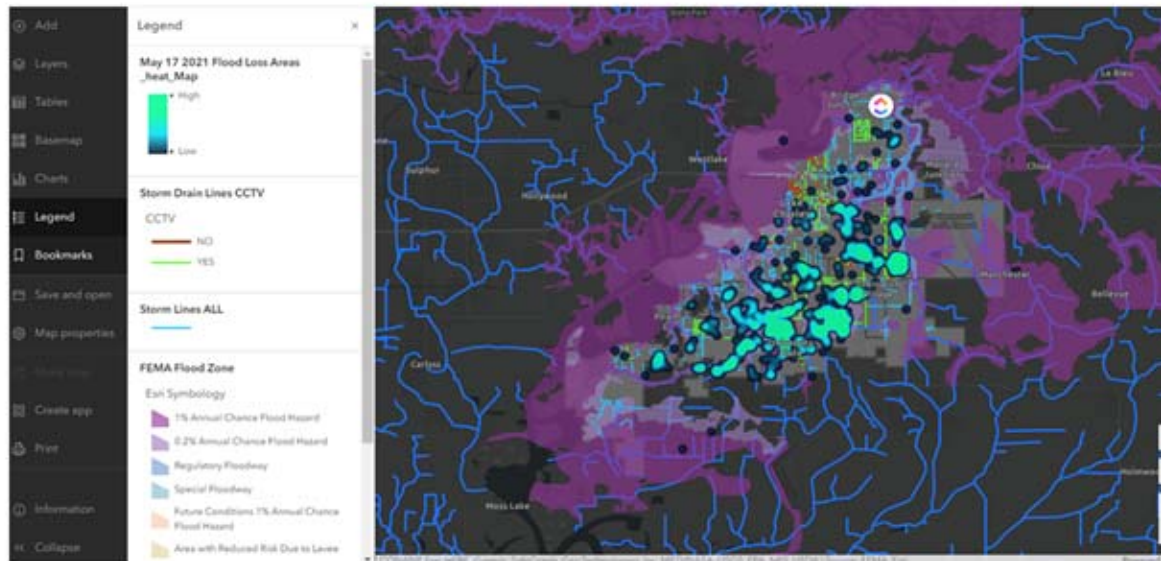


Figure 3: Flood Claims from the May 2021 Flood Event. This GIS image is based on FEMA floodplain data and City data.

Single Family vs. Multi-Family Needs; Owner Occupied vs. Tenant-Occupied

FEMA IA Owner-Occupied

Table 5: FEMA IA Data of Owner-Occupied Households. The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

| Parish | # of Applicants | # of Inspections | # Inspected with Damage | # Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Amount |
|-----------|-----------------|------------------|-------------------------|-----------------------|--------------------------|------------------------------|
| Calcasieu | 1,823 | 1,210 | 817 | 1,210 | \$8,234,001 | \$6,089 |

Due to the average FEMA verified amount being estimated at \$6,089 and the State allocation being substantially used to address damaged housing stock, the City of Lake Charles has opted to not fund its substantially smaller direct allocation to addressing owner-occupied family housing units

FEMA IA Tenant Applications

Table 6: FEMA IA Data of Tenant Applicants. The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

| Parish | # of Applicants | # of Inspections | # Inspected with Damage | # Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Amount |
|-----------|-----------------|------------------|-------------------------|-----------------------|--------------------------|------------------------------|
| Calcasieu | 1,611 | 760 | 279 | 760 | \$1,222,076 | \$1,608 |

Due to the average FEMA verified amount being estimated at \$1,608.00 and the State allocation addressing damaged housing stock, the City of Lake Charles is not providing additional subsidy to address this need at this time.

FEMA Real Property Damage Owner Occupied Units

Note for the following tables, FEMA definitions for degree of damage are as follows:

- Units with Minor Low and High damage: Repairable, non-structural damage to a home or damage from flood waters when the waterline is 18 inches or below in a conventionally built home or when the waterline is in the floor system of a manufactured home.
- Units with Major Low and High damage: Structural damage or other significant damage that requires extensive repairs or damage from flood waters when the waterline is 18 inches or above in a conventionally built home or when the waterline enters the living space of a manufactured home.
- Units with Severe (Destroyed) damage: Significant enough damage that the home is deemed a total loss

Table 7: FEMA IA Data Real Property Damage of Owner-Occupied Units. *The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.*

| Parish | Units with Minor-Low | Units with Minor-High | Units with Major-High | Units with Major-Low | Units with Severe |
|-----------|----------------------|-----------------------|-----------------------|----------------------|-------------------|
| Calcasieu | 219 | 493 | 28 | 263 | 2 |

Based on the above table, State-funded CDBG-DR programs as well as FEMA IA and private insurance have been made available as funding sources for the total 1,005 owner-occupied units requiring repair or total reconstruction. HUD waived and provided an alternative requirement related to the Section 104(d) one-for-one replacement of owner-occupied lower-income dwelling units regulation. This means that the number of pre-existing affordable units do not have to be replaced in direct ratio to the number lost. This waiver and the alternative requirements are noted further in the Federal Register Notice for these funds. The City does not plan to use its CDBG-DR allocation to address owner-occupied housing due to the availability of State CDBG-DR funds to meet homeowner needs. However, should the City become aware of additional unmet needs related to owner-occupied housing and re-allocate CDBG-DR funds to homeowner activities in the future, the City will rely on this waiver.

FEMA Real Property Damage Rental Units

Table 8: FEMA IA Data Real Property Damage of Rental Units. *The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.*

| Parish | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe |
|-----------|----------------------|-----------------------|----------------------|-----------------------|-------------------|
| Calcasieu | 231 | 156 | 4 | 54 | 5 |

Prior to the Severe Floods and Tornado Event of May 2021, the affordable rental housing stock, especially designated for the most vulnerable LMI populations (the elderly, disabled, homeless and transitional), was critically low. With the additional stressors of economic downturn and outmigration as outlined in this Action Plan, the lack of this affordable rental housing stock has been exacerbated by the May 2021 event. Therefore the City of Lake Charles is advancing projects to meet this critical community development need to address this to ensure resilience and mitigate the outmigration of its citizens who would prefer to remain in their community.

Public Housing and Affordable Housing.

The Housing Authority of Lake Charles historically managed up to 833 units across multiple developments under the Public Housing Program. The Housing Authority has been actively working to rehabilitate older developments and to convert properties to the Rental Assistance Demonstration (RAD) Program.

The Housing Authority is managing 456 public housing units, 323 units under RAD, 70 moderate rehabilitation (Mod Rehab) units, and 2,108 Housing Choice Voucher units. According to HUD assisted housing data for 2019 and the Housing Authority of Lake Charles, Housing Choice Voucher (HCV) is the most widely used program, as 2,108 persons participated in the program in 2019. Public Housing helped 456 households and Mod Rehab helped 169 persons within 70 units. Black or African-American residents make up the largest proportion of residents in assisted housing. These residents comprise 89% of public housing, 93% of HCV, and 90% of Mod Rehab users. White, non-Hispanic residents represent 11% of public housing and 6% of HCV residents. Hispanic persons comprise less than 2% of assisted housing residents.

This Action Plan proposes a substantial expansion of committed affordable (non public) housing units to address the critical need of affordable housing in the City of Lake Charles.

All program policies and procedures developed for the use of this allocation of CDBG-DR and MIT will include appropriate definitions for “suitable to rehab” so that a consistent and appropriate procedure is followed in considering when a property is unsuitable for rehab investment and warrants an alternative intervention or residential service.

Insurance Claims and Losses in Disaster-Impacted Areas

Table 9: Insurance Claims and Losses. *The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.*

| Parish | # of Claims | # of Claims Resulting in Loss | Direct Incurred Losses |
|-----------|-------------|-------------------------------|------------------------|
| Calcasieu | 179 | 77 | \$2,097,735 |

Demographics of Disaster-Impacted Populations

Lake Charles is the principal city of Calcasieu Parish and the Lake Charles Metropolitan Statistical Area (MSA). The Lake Charles MSA consists of Calcasieu and Cameron parishes. Social and economic characteristics of the MSA are discussed in the Overview Section of this Plan. Lake Charles has a diversified population and is a HUD entitlement city.

Education Demographics

The majority of persons 25 years old or older in Lake Charles are at least high school graduates. Nearly a third of that population has a bachelor’s degree or higher.

Table 10: Education Demographics in the City of Lake Charles. *The source for this data is the U.S. Census Bureau’s American Community Survey database for 2021.*

| | |
|---|-------|
| High school graduate or higher, percent of persons age 25+ years, 2016–2020 | 88.5% |
| Bachelor’s degree or higher, percent of persons age 25+ years, 2016–2020 | 32.9% |

Income Demographics

In 2021, more than a fifth of Lake Charles residents had incomes that qualified them as living in poverty.

Table 11: Income and Poverty in the City of Lake Charles. *The source for this data is the U.S. Census Bureau’s American Community Survey database for 2021.*

| | |
|--|----------|
| Median household income (in 2020 dollars), 2016–2020 | \$44,785 |
| Per capita income in past 12 months (in 2020 dollars), 2016–2020 | \$30,683 |
| Persons in poverty, percent | 21.4% |

LMI Demographics

As illustrated in Table 11, a majority of residents (60 %) maintain incomes less than or equal to 80% of the HUD Area Median Family Income (HAMFI). Renters represent 64% of that population, while homeowners represent 69% of those with incomes above 80% of HAMFI.

Table 12: Lake Charles, LA HAMFI Data. *The source for this data is HUD’s Office of Policy Development and Research (PD&R) Comprehensive Housing Affordability Strategy (CHAS) data for 2015–2019, <https://www.huduser.gov/portal/datasets/cp.html>.*

| Income Distribution Overview | Owner | Renter | Total | % of Total |
|-------------------------------|-------|--------|-------|------------|
| Household Income <= 30% HAMFI | 1,510 | 4,050 | 5,560 | 17.0% |

| | | | | |
|---------------------------------------|---------------|---------------|---------------|-------------|
| Household Income >30% to <=50% HAMFI | 1,955 | 3,325 | 5,280 | 16.0% |
| Household Income >50% to <=80% HAMFI | 2,385 | 3,085 | 5,470 | 17.0% |
| Household Income >80% to <=100% HAMFI | 1,790 | 1,495 | 3,285 | 10.0% |
| Household Income >100% HAMFI | 9,495 | 3,620 | 13,115 | 40.0% |
| Total | 17,135 | 15,575 | 32,710 | 100% |

HUD considers families that pay more than 30% of their income for housing to be cost-burdened, and as a result, likely to experience significant economic hardship. These individuals are likely to have amplified recovery needs due to a lack of resources to invest in improvements to increase preparedness, property protection, or recovery. As Table 12 shows, the majority of residents of Lake Charles are not cost-burdened, with nearly 67% equal to or below 30% of HAMFI. Not surprisingly, however, renters account for 72% of those who are cost-burdened or for whom the cost burden is not available.

Table 13: Lake Charles, LA HUD Housing Cost Burden Data. The source for this data is HUD PD&R CHAS data for 2015–2019, <https://www.huduser.gov/portal/datasets/cp.html>.

| Housing Cost Burden Overview | Owner | Renter | Total | % of Total |
|------------------------------|---------------|---------------|---------------|-------------|
| Cost Burden <=30% | 14,105 | 7,655 | 21,760 | 66.6% |
| Cost Burden >30% to <=50% | 1,485 | 3,690 | 5,175 | 15.8% |
| Cost Burden >50% | 1,390 | 3,715 | 5,105 | 15.6% |
| Cost Burden not available | 150 | 510 | 660 | 2.0% |
| Total | 17,130 | 15,570 | 32,700 | 100% |

LMI Analysis: Federally Declared Disaster Areas

Table 14: LMI Analysis. The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

| Parish | Non-MID-Total LMI Persons | Non-MID-Total Population | Non-MID-Percentage LMI | MID-Total LMI Persons | MID-Total Population | MID-Percentage LMI |
|-----------|---------------------------|--------------------------|------------------------|-----------------------|----------------------|--------------------|
| Calcasieu | 0 | 0 | 0% | 285 | 421 | 66% |

Mobile Housing Units Impacted by Disaster

Table 15: Mobile Housing Units Impacted. The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

| Parish | Number of Units | % of Total Units in Parish |
|-----------|-----------------|----------------------------|
| Calcasieu | 45 | 0% |

Limited English Proficiency Breakdown

Table 16: Population Speaking English Less Than "Very Well." The source for this data is the 2020 Census, https://censusscope.org/us/s22/m3960/chart_language.html.

| Language Spoken at Home | Number | Percent |
|-------------------------|--------|---------|
| Spanish | 755 | 28.44% |
| Other Indo-European | 2,362 | 20.87% |
| Asian Language | 353 | 52.37% |
| Other Language | 49 | 21.21% |

Race and Ethnicity

Table 17: Race and Ethnicity. The source for this data is the 2021 American Communities Survey, <https://www.census.gov/programs-surveys/acs/data.html>.

| Race Ethnicity | Percent |
|--|---------|
| White alone | 46.9 |
| Black or African American alone | 46.2 |
| American Indian and Alaska Native alone | 0.2 |
| Native Hawaiian and Other Pacific Islander alone | 0.0 |
| Asian alone | 2.3 |
| Two or more races | 3.6 |
| Hispanic or Latino | 3.8 |
| White alone, not Hispanic or Latino | 45.0 |

Disabilities

Table 18: Disabilities. The source for this data is the 2021 American Communities Survey, <https://www.census.gov/programs-surveys/acs/data.html>

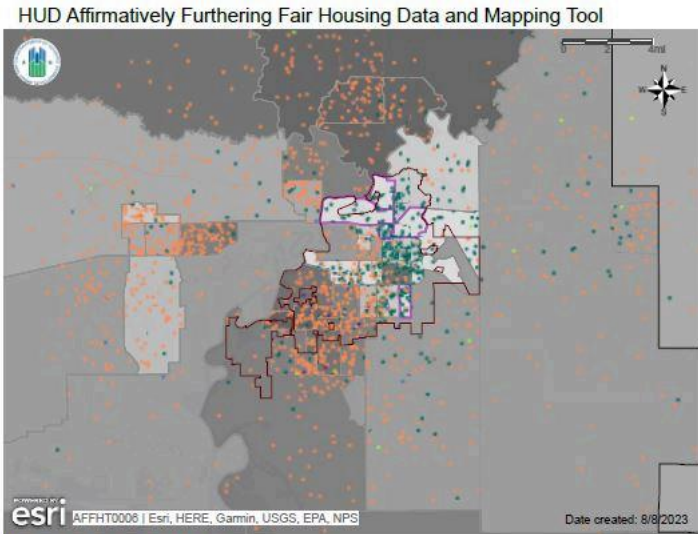
| Disabilities | Percent |
|-----------------------------------|---------|
| With a disability, under 65 years | 11.1 |

Tribal and Indigenous Areas.

According to the U.S. Census "My Tribal Area" database (<https://www.census.gov/tribal/?st=22&aianihh=0795>), there are no designated tribal or indigenous lands located within the City of Lake Charles.

Racially and Ethnically Concentrated Areas of Poverty

The graphic below is taken from the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool for the City of Lake Charles.



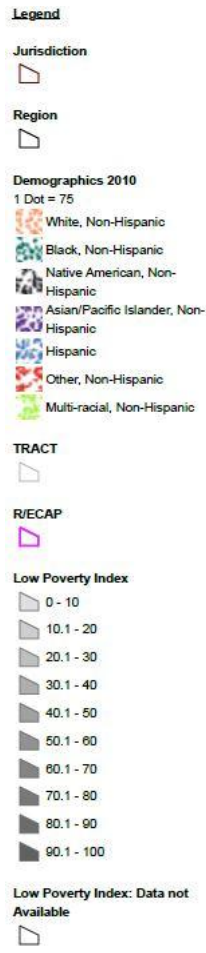
Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Lake Charles (CDBG, HOME)

Region: Lake Charles, LA

HUD-Provided Data Version: AFFHT0006



Affected Continuum-of-Care Entities

Table 18: Affected Continuum of Care Entities—January 2020 Point in Time (PIT) Count Data. The source for this data is LA BOSCOG <https://laboscoc.org/fy19-point-in-time-count>

| Location | CoC Entity | Unsheltered Count |
|--|--|-------------------|
| Lake Charles Region (Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis) | Louisiana Balance of State Continuum of Care (LA BOSCOG) | 283 |

Lake Charles is encompassed within the Continuum of Care (CoC) geography covered by the LA BOSCOG. The CoC conducts an annual Point-in-Time (PIT) Count of persons experiencing homelessness in the Lake Charles region and across the CoC’s geographic coverage area. The City of Lake Charles, Calcasieu Parish, and a number of local non-profit organizations participate in the annual PIT Count. In 2018, the PIT Count identified 134 single individuals experiencing homelessness in the Lake Charles region. In 2019, the PIT Count decreased slightly from the prior year, identifying 133 single individuals experiencing homelessness. In 2020, the PIT Count increased from a total of 133 people to 172 people, with increases in both the sheltered and unsheltered populations. Of those identified, approximately 27 are considered chronically homeless. Data from the CoC indicates that, outside of the annual PIT Count, approximately 97% of those accessing the homeless Coordinated Entry System in the Lake Charles region report that they originate from the region.

Of persons identified as experiencing homelessness in the 2019 PIT Count, 25 were youth (19%) and 14 reported veteran status (11%). No families experiencing homelessness were identified in either the 2018 or the 2019 annual count. PIT Count data for 2018 and 2019 indicates the prevalence of disabling conditions among persons experiencing homelessness in the region. In 2019, those experiencing homelessness reported a total of 64 disabling conditions, while 91 disabling conditions were reported by PIT Count respondents in 2018. The disabling conditions reported included mental health conditions, physical conditions, chronic health conditions, substance abuse, developmental disabilities, and HIV/AIDS. Detailed data on disability from the 2020 PIT Count is not yet publicly available.

Table 17 below provides an estimate of individuals experiencing sheltered and unsheltered homelessness in the Lake Charles region, as well as key information regarding household characteristics. This data is ultimately derived from the Louisiana Balance of State CoC's 2019 PIT Count. Detailed information regarding the 2020 PIT Count is not yet publicly available.

Table 19: Homelessness in Lake Charles. *The immediate source for this data is the City of Lake Charles 2020-2-24 Consolidated Plan, July 2021.*

| Population | Estimate the # of persons experiencing homelessness on a given night | |
|--|--|-------------|
| | Sheltered | Unsheltered |
| Persons in Households with Adult(s) and Child(ren) | 7 | 0 |
| Persons in Households with Only Children | 0 | 7 |
| Persons in Households with Only Adults | 101 | 60 |
| Chronically Homeless Individuals | 21 | 6 |
| Chronically Homeless Families | 0 | 0 |
| Veterans | 5 | 14 |
| Unaccompanied Child | 10 | 9 |
| Persons with HIV | 0 | 9 |

Housing for Vulnerable Populations

The City of Lake Charles has determined that other funding is available for the following: transitional housing, permanent supportive housing, and permanent housing needs of individuals and families with children (especially those with incomes below 30% of the area median) that were homeless and/or became homeless after the May 2021 storm events; the special needs of persons who were not homeless but required supportive housing prior to the May 2021 storm events (e.g., elderly, persons with disabilities, persons with alcohol/drug addictions, persons with HIV/AIDS and their families, and public housing residents, as identified in 24 CFR 91.315(e)). These needs will be addressed by the State of Louisiana's innovative Permanent Supportive Housing (PSH) program.

The Louisiana Permanent Supportive Housing model, under the auspices of the Louisiana Housing Corporation, combines deeply affordable rental housing with voluntary, flexible and individualized community-based services to assist people with the most severe and complex disabilities to live successfully in the community. PSH is not a new model of housing. Successful efforts to create PSH units in numerous states have been well documented over the years, and a significant body of research has proven that successful outcomes for people and cost savings to government are achieved through the PSH approach.

Louisiana's PSH goal is truly ambitious and far-reaching. Rather than simply creating 3,000 PSH units, Louisiana has set out to create the nation's first comprehensive PSH system that helps the State achieve several important policy objectives, including:

- Addressing chronic homelessness;
- Reducing the unnecessary confinement of people with serious disabilities in nursing homes and other high-cost restrictive settings; and
- Improving the state's fragile behavioral health system through the implementation of evidence-based models of housing and services.

Louisiana's Permanent Supportive Housing program includes supportive housing services. The City will work with homeless service providers to assess these needs on an ongoing basis and may re-allocate funding via Substantial Amendment to address housing for vulnerable populations should a future unmet need be identified that the PSH model above may not fully address.

Multifamily Assisted Housing

| Type Of Damage | # of Properties | # of Units | # of Units Assisted | # of Units Waiting Assistance | Remaining Unmet Need |
|----------------|-----------------|------------------|---------------------|-------------------------------|----------------------|
| Minor-Low | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 |
| Minor-High | 71.00 | 9,567.00 | 3,318.00 | 6,249.00 | \$6,249.00 |
| Major-Low | 15.00 | 1,458.00 | 633.00 | 825.00 | \$825.00 |
| Major-High | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 |
| Severe | 23.00 | 3,246.00 | 1,312.00 | 1,934.00 | \$1,934.00 |
| Total | 109.00 | 14,271.00 | 5,263.00 | 9,008.00 | \$9,008.00 |

Data Source(s): The State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations

* FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

Public Housing Authorities Damaged

| County/Municipality | Total # PHAs | Total PHAs Damaged | # of Units Damaged | Remaining Unmet Need |
|--------------------------------|--------------|--------------------|--------------------|----------------------|
| Calcasieu/City of Lake Charles | 4.00 | 0.00 | 0.00 | \$0.00 |
| Total | 4.00 | | | |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Fair Housing, Civil Rights Data and Advancing Social Equity

As a condition of receiving CDBG-DR funds, grantees must certify that they will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that their proposed use of funds is consistent with their obligation to affirmatively further fair housing. The City most recently completed an Analysis of Impediments to Fair Housing Choice in 2013. A new analysis will be undertaken in the next six months and this Action Plan will be amended as necessary and appropriate to address any impediments to fair housing identified in the updated plan. Based on the assessment provided in the updated State of Louisiana which includes the City of Lake Charles, . Moreover, in 2005, the City approved the Lake Charles Fair Housing Ordinance, which aims to curb the potential negative effects of public policies on housing for protected classes and low-income residents. The affordable housing activities proposed in this Action Plan will affirmatively further fair housing by being affordable to low and moderate income residents and affirmatively marketing to vulnerable populations and those identified as least likely to apply. Furthermore, all activities proposed in this plan will be carried out in accordance with the recommendations from the 2020 State Analysis of Impediments and the 2013 City Analysis of Impediments (and future updates), as well as the City's Fair Housing Ordinance.

The State's 2020 Analysis of Impediments to Fair Housing Choice specifically highlight Lake Charles' public comments that state that:

- Seniors suffering the most from cost burden. Mostly elderly residents are in substandard housing that is due to deferred maintenance/rehabilitation due to lack of funding.

- Most substandard housing is homeownership where homes were generationally passed down without clear title and there is lack of funding to effect needed repairs.
- Lack of public transportation that is non-existent on Saturday and Sunday.
- Post Hurricane Rita, formerly affordable housing is now unaffordable to LMI individuals/families (reduced habitable housing stock).
- High incidence of poor credit scores resulting in fewer housing and job choices.
- Criminal background checks impede ability to gain employment.
- Businesses in North Lake Charles (majority-African American neighborhood) do not pay more than the minimum wage. Students must attend neighborhood-based schools, unless they apply to charter schools which do not provide bus service.
- Tobacco and alcohol retail is disproportionately represented in North Lake Charles.
- Additional housing is needed for growing workforce: people are coming from other jurisdictions for jobs, but there is no housing.
- Section 8 and public housing residents do have access to high opportunity neighborhoods, but it is "not enough." Developers face Not in My Backyard (NIMBYism) from neighbors living in South Lake Charles.
- Some of North Lake Charles' public housing stock is in poor condition (north of Broad Street)

Educational attainment data significantly provides an understanding when analyzing and arriving at valid conclusions in an AI. In discussing the Lake Charles area, it is important to note that the suburban and rural areas surrounding Lake Charles have virtually no areas of large African American population concentration, unlike the other regions of the state. Within the City of Lake Charles, African American residents are concentrated on the north and east sides and also reside in a corridor that stretches from east to west across the city between 12th Street and I-210. School Proficiency Indices are moderate in areas of African American population concentration in the northern portion of the city. In areas of African American population concentration on the east side of the city, School Proficiency Indices are low. Areas of White population concentration on the west side of the city but east of the Bayou Contraband tend to have relatively low School Proficiency Indices while mostly White areas to the west of Bayou Contraband have relatively high School Proficiency Indices. Rural and suburban areas of the region are all predominantly White. Those areas that are to the immediate north and west of Lake Charles tend to have relatively high School Proficiency Indices while areas to the south and east, as well as areas such as Vinton, tend to have low to moderate School Proficiency Indices. Individuals of Mexican national origin are concentrated in Sulphur and in the southwestern portion of Lake Charles in areas with relatively high School Proficiency Indices. Individuals of other national origins, including Honduran, Indian, Filipino, and Vietnamese individuals, are concentrated in Sulphur and Lake Charles but not within specific neighborhoods in Lake Charles. Families with children tend to be concentrated in suburban areas and in the far southwest of Lake Charles in areas with relatively high School Proficiency Indices.

In the City of Lake Charles, elderly households are disproportionately likely to reside in public housing and in Project-Based Section 8 outside of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) but comprise a larger share of R/ECAP tenants in the Housing Choice Voucher program. There are no Other Multifamily developments located within R/ECAPs in the city. Persons with disabilities are disproportionately likely to reside outside of R/ECAPs in all categories except for Housing Choice Vouchers where they comprise similar percentages of R/ECAP and non-R/ECAP tenants. Families with children are more likely to reside outside of R/ECAPs if they are voucher holders and within R/ECAPs if they live in public housing or Project-Based Section 8. The graphic below was taken from <https://www.doa.la.gov/media/hdtlwqch/proposed-2020-analysis-of-impediments-to-fair-housing-choice.pdf>.

| | Total Occupied Units | % Elderly | % with a Disability | % White | % Black | % Hispanic | % Asian or Pacific Islander | % Families with Children |
|--------------------------------|----------------------|-----------|---------------------|---------|---------|------------|-----------------------------|--------------------------|
| Public Housing | | | | | | | | |
| R/ECAP tracts | 217 | 15.67% | 9.68% | 0.93% | 98.15% | 0.93% | 0.00% | 60.83% |
| Non R/ECAP tracts | 536 | 26.69% | 13.35% | 9.33% | 88.95% | 1.71% | 0.00% | 50.94% |
| Project-Based Section 8 | | | | | | | | |
| R/ECAP tracts | 120 | 8.00% | 4.80% | 2.42% | 97.58% | 0.00% | 0.00% | 73.60% |
| Non R/ECAP tracts | 675 | 45.42% | 49.20% | 49.59% | 48.57% | 1.43% | 0.20% | 19.32% |
| Other HUD Multifamily | | | | | | | | |
| R/ECAP tracts | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Non R/ECAP tracts | 100 | 43.43% | 85.86% | 47.42% | 49.48% | 2.06% | 1.03% | 3.03% |
| HCV Program | | | | | | | | |
| R/ECAP tracts | 109 | 20.79% | 17.82% | 1.01% | 97.98% | 1.01% | 0.00% | 40.59% |
| Non R/ECAP tracts | 1,503 | 9.52% | 17.36% | 8.75% | 90.58% | 0.52% | 0.07% | 61.61% |

Since 2013, additional studies, such as the *2014 Southwest Louisiana Housing Study, Strategic Plan, and Implementation Strategy*, found that regional development efforts are needed to meet the growing demands for education, health care, and housing in Lake Charles and the region as a whole. All proposed new construction affordable housing projects are not located in the City's defined R/ECAP therefore offering future residents choices that do not continue to geographically concentrate poverty.

The City of Lake Charles fully complies with Title VI of the Civil Rights Act of 1964, Americans With Disabilities Act (ADA), and related statutes, executive orders, and regulations in all programs and activities. The City operates without regard to race, color, or national origin. Any person who believes himself or herself or any specific class of persons to be subjected to discrimination prohibited by Title VI or the ADA may file a written complaint with the City of Lake Charles by himself or herself or via a representative. The City's Title VI Coordinator/ADA Coordinator may be reached by phone at (337) 491-1440, via the Mayor's Action Line at (337) 491-1346, or by contacting the appropriate Department Head.

Grantee Demographics and Disaster Impacted Populations

| Demographic | Area-Wide Estimates | Area-Wide Percent | Disaster Declaration Estimate | Disaster Declaration Percent | MID Estimates | MID Percent |
|--|---------------------|-------------------|-------------------------------|------------------------------|---------------|-------------|
| Total Population | 4,664,362.00 | 100.00% | 2,434,578.00 | 52.00% | 182,434.00 | 4.00% |
| Under 5 years | 307,435.00 | 7.00% | 158,457.00 | 52.00% | 11,781.00 | 4.00% |
| 65 years and over | 698,018.00 | 15.00% | 348,366.00 | 50.00% | 28,228.00 | 4.00% |
| Population with a Disability | 695,791.00 | 15.00% | 368,208.00 | 53.00% | 29,165.00 | 4.00% |
| White or Caucasian | 2,735,887.00 | 59.00% | 1,410,208.00 | 52.00% | 108,498.00 | 4.00% |
| Black or African American | 1,492,386.00 | 32.00% | 805,509.00 | 54.00% | 61,399.00 | 4.00% |
| American Indian and Alaska Native | 23,892.00 | 1.00% | 13,603.00 | 57.00% | 410.00 | 2.00% |
| Asian | 80,014.00 | 17.00% | 42,990.00 | 54.00% | 2,719.00 | 3.00% |
| Native Hawaiian and Other Pacific Islander | 1,088.00 | 1.00% | 445.00 | 41.00% | 0.00 | 0.00% |
| Other | 82,139.00 | 2.00% | 45,105.00 | 55.00% | 3,434.00 | 4.00% |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Income Demographics

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|------------------------------|-------------|----------------------------|-------------|
| Median Household Income | \$49,469.00 | \$44,785.00 | \$48,747.00 |
| Per Capita Income | \$27,923.00 | \$30,683.00 | \$26,606.00 |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Income Demographics - Low Income

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|--|-----------|----------------------------|----------|
| Income in the past 12 months below poverty level | 0.00 | 0.00 | 0.00 |

Data Source(s): Louisiana State Action Plan

LMI Analysis - Overall

| Category | Total LMI Persons | Total Population | Percent LMI |
|-----------|-------------------|------------------|-------------|
| Area wide | 285.00 | 431.00 | 66.00% |

Data Source(s): The Data Source for Calcasieu Parish is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

LMI Analysis - Federally Declared Disaster Areas

| County/Municipality | Non-MID-Total LMI Persons | Non-MID-Total Population | Non-MID-Percentage LMI | MID-Total LMI Persons | MID-Total Population | MID-Percentage LMI |
|---------------------|---------------------------|--------------------------|------------------------|-----------------------|----------------------|--------------------|
| Calcasieu | 0.00 | 0.00 | 0.00% | 285.00 | 421.00 | 67.70% |
| Total | | | | 285.00 | 421.00 | 67.70% |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Manufactured Housing Units Impacted by Disaster

| County/Municipality | Number of Units | % of Total Units in County/Municipality | Remaining Unmet Need |
|---------------------|-----------------|---|----------------------|
| Calcasieu | 45.00 | 0.00% | \$0.00 |
| Total | 45.00 | | |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Limited English Proficiency Breakdown of Disaster-Related Areas

| County/Municipality | Estimate Speak English Less than 'Very Well' | Percent Speak English Less than 'Very Well' |
|--|--|---|
| Calcasieu/Spanish Language | 755.00 | 28.44% |
| Calcasieu/Other Indo-European Language | 2,362.00 | 20.87% |
| Calcasieu/Asian Language | 353.00 | 52.37% |
| Calcasieu/Other Language | 49.00 | 21.21% |

| County/Municipality | Estimate Speak English Less than 'Very Well' | Percent Speak English Less than 'Very Well' |
|---------------------|--|---|
| Total | 3,519.00 | |

Data Source(s): 2020 Census, https://censusscope.org/us/s22/m3960/chart_language.html

Point-in-Time Count - Type of Shelter

| Geography | Emergency Shelter | Transitional Housing | Unsheltered Homeless | Total Known Homeless |
|---------------|-------------------|----------------------|----------------------|----------------------|
| Area wide | 1,224.00 | 358.00 | 518.00 | 2,100.00 |
| FEMA Declared | 996.00 | 288.00 | 482.00 | 1,766.00 |
| MID | 675.00 | 270.00 | 482.00 | 1,427.00 |

Data Source(s): The source for this area-wide/Statewide data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Point-in-Time Count - Impacted by Disaster

| Geography | Emergency Shelter | Transitional Housing | Unsheltered Homeless | Total Known Homeless |
|---------------|-------------------|----------------------|----------------------|----------------------|
| Area wide | 1,224.00 | 358.00 | 518.00 | 2,100.00 |
| FEMA Declared | 996.00 | 288.00 | 482.00 | 1,766.00 |
| MID | 675.00 | 270.00 | 482.00 | 1,427.00 |

Data Source(s): The source for this Statewide (area wide) data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Infrastructure Unmet Needs

It is estimated that in total, the flood and tornado event of May 17, 2021 cost the State of Louisiana \$1.3 billion in damages to residential, business, and public infrastructure. The following data is statewide and not specific to Lake Charles or to Calcasieu Parish. We can reasonably extrapolate from the fact that the impacts were primarily on Lake Charles/Calcasieu Parish and East Baton Rouge Parish that approximately 20–25% of the aggregate dollar figures outlined below should represent an approximation of the actual figure applicable to the City of Lake Charles.

Disaster Damage and Impacts - Infrastructure.

Table 20: FEMA PA Program Statewide. *The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.*

| PA Category | # Damaged Sites | Sum of Approx. Cost | Sum of Federal Share | Sum of Non-Federal Share |
|-------------|-----------------|---------------------|----------------------|--------------------------|
| | | | | |

| | | | | |
|------------------------------|--------------|------------------------|------------------------|----------------------|
| A – Debris | 476 | \$475,214,862 | \$443,742,610 | \$31,472,252 |
| B – Emergency Measures | 952 | \$1,194,431,986 | \$1,089,600,457 | \$104,831,529 |
| C – Roads and Bridges | 61 | \$17,709,279 | \$15,938,351 | \$1,770,928 |
| D – Water Control Facilities | 61 | \$49,855,528 | \$44,869,975 | \$4,985,553 |
| E – Building and Equipment | 1,188 | \$688,888,779 | \$619,999,902 | \$68,888,877 |
| F – Utilities | 92 | \$359,949,315 | \$323,954,384 | \$35,994,931 |
| G – Other | 200 | \$35,120,530 | \$31,608,477 | \$3,512,053 |
| All Categories | 3,030 | \$2,821,170,279 | \$2,569,714,156 | \$251,456,123 |
| Total without A and B | 1,602 | \$1,151,523,431 | \$1,036,371,089 | \$115,152,342 |

Table 21: Total Cost and Need by PA Category Statewide. [The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.]

| PA Category | Estimated PA Cost | 10% Local Match | 15% Resiliency | Total Need (Match + Resiliency_) |
|------------------------------|-------------------|-----------------|----------------|----------------------------------|
| A – Debris | \$475,214,862 | \$31,472,252 | \$71,282,229 | \$102,754,481 |
| B – Emergency Measures | \$1,194,431,986 | \$104,831,529 | \$179,164,798 | \$283,996,327 |
| C – Roads and Bridges | \$17,709,279 | \$1,770,928 | \$2,626,392 | \$4,427,320 |
| D – Water Control Facilities | \$49,855,528 | \$4,985,553 | \$7,478,329 | \$12,463,882 |
| E – Building and Equipment | \$688,888,779 | \$68,888,877 | \$103,333,317 | \$172,222,194 |

| | | | | |
|---------------|------------------------|----------------------|----------------------|----------------------|
| F – Utilities | \$359,949,315 | \$35,994,931 | \$53,992,397 | \$89,987,329 |
| G – Other | \$35,120,530 | \$3,512,053 | \$5,268,079 | \$8,780,132 |
| Total | \$2,821,170,279 | \$251,456,123 | \$423,175,542 | \$674,631,665 |

Total Cost and Need by PA Category

| PA Category | Estimated PA Cost | Local Match | Resiliency | Total Need (Match + Resiliency) |
|------------------------------|---------------------------|-------------------------|-------------------------|--|
| A - Debris | \$475,214,862.00 | \$31,472,252.00 | \$71,282,229.00 | \$102,754,481.00 |
| B - Emergency Measures | \$1,194,431,986.00 | \$104,831,529.00 | \$179,164,798.00 | \$283,996,327.00 |
| C - Roads and Bridges | \$17,709,279.00 | \$1,770,928.00 | \$2,626,392.00 | \$4,427,320.00 |
| D - Water Control Facilities | \$49,855,528.00 | \$4,985,553.00 | \$7,478,329.00 | \$12,463,882.00 |
| E - Building and Equipment | \$688,888,779.00 | \$68,888,877.00 | \$103,333,317.00 | \$172,222,194.00 |
| F - Utilities | \$359,949,315.00 | \$35,994,931.00 | \$53,992,397.00 | \$89,987,329.00 |
| G - Other | \$35,120,530.00 | \$3,512,053.00 | \$5,268,079.00 | \$8,780,132.00 |
| Total | \$2,821,170,279.00 | \$251,456,123.00 | \$423,145,541.00 | \$674,631,665.00 |

Data Source(s): The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Hazard Mitigation Needs per County or Known Project

| Project | Cost | Funding Source | Unmet Need |
|----------------|-------------------------|-----------------------|-------------------------|
| Statewide | \$505,147,256.00 | - | \$126,286,814.00 |
| Total | \$505,147,256.00 | | \$126,286,814.00 |

Data Source(s): Data source: The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

Economic Revitalization Unmet Need

As described above, it is estimated that in total, the flood and tornado event of May 17, 2021 cost the State of Louisiana \$1.3 billion in damages to residential, business, and public infrastructure. The following data is statewide and not specific to Lake Charles or to Calcasieu Parish. However, we can reasonably extrapolate from the fact that the impacts were primarily on Lake Charles/Calcasieu Parish and East Baton Rouge Parish that approximately 20–25% of the aggregate dollar figures outlined below should represent an approximation of the actual figure applicable to the City of Lake Charles. The summary of impact and unmet needs are presented in Table 20 below.

Table 22: Impact and Unmet Needs Statewide. The source for this data is the State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.

| Type of Loss | Total |
|---|------------------------|
| Business Structures | \$6,867,000,000 |
| Business Equipment | \$2,184,200,000 |
| Business Interruption (Includes labor productivity and value-added losses.) | \$2,576,400,000 |
| Agriculture/Timber | \$584,424,392 |
| Business Loans/Economic Injury Disaster Loans (EIDL) | (\$105,797,850) |
| Paid/Reserves of Reported Claims | (\$5,131,748,513) |
| Total Unmet Needs | \$6,974,478,029 |

Disaster Damage and Impacts - Economic Revitalization

Lake Charles has a history of strong economic resilience going back many decades; this series of major disasters is the largest challenge this community has ever faced. The local and federal data on the economic impact is compelling:

- **Lake Charles MSA was the only MSA in the state not to grow in 2021.** In fact, employment in the MSA in June 2021 was actually lower (-7%) than in April 2020, when the COVID lockdowns first hit. [7]
- **Lake Charles lost a staggering number of businesses;** 56% of the businesses in existence in 2019 did not renew their occupational license. [8]
- **Lake Charles is the largest event of 2020 disasters,** accounting for 32% of the total verified businesses losses (TVL) according to Small Business Administration (SBA) data. According to the same data, **Lake Charles is the most-impacted community, with nearly double the amount of TVL compared to the second city, Nashville, and larger than the losses for the rest of Louisiana added together.** [9]
- Lake Charles shows significant evidence of **workforce displacement:** 60% of public housing is still offline; Calcasieu Parish School Board reports a 14% decline in public school enrollment; McNeese/SOWELA experienced a 9% decline in enrollment; and an estimated 8% of residents remain displaced.
- Forecasted **Loss of operational revenues** include a 270% increase in parcels of unpaid property taxes in 2020 compared to 2019, and an anticipated 9% decrease in property tax revenue.
- **An 833% increase in blighted properties (commercial and residential)** has increased the cost of condemnations and demolitions, caused a corresponding decrease in housing stock, and represents a loss of future property tax income for the City.

[7] Louisiana Economic Forecast, State and MSAs: 2022 and 2023. Dr. Loren Scott, October 2021. p74.

[8] City of Lake Charles, Occupational License Data, (September 2021).

[9] SBA's FFY 20 Business Disaster Loan database, <https://www.sba.gov/document/report-sba-disaster-loan-data>

See DRGR Documents Section for narrative on Public Services Unmet Needs

Mitigation Only Activities

The City will use mitigation funds to underwrite the costs of the new Lake Charles Fire Training Campus as well as resilient construction standards applied to all structures funded through its CDBG-DR programs. This will prevent physical damage from future storm events, thereby mitigating the impact of these storms. The Consolidated Notice 87 FR 31636 requires the proposed use of the CDBG-DR mitigation set-aside to comply with four requirements: (1) Meet the definition of mitigation activities; (2) address the current and future risks as identified in the grantee's mitigation needs assessment in the MID areas; (3) be CDBG-eligible activities under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and (4) meet a national objective. The following table illustrates how the Lake Charles Fire Training Campus project meets each requirement.

| | |
|--|---|
| Meet the definition of mitigation activities (defined as "activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters") | The Fire Training Campus project will increase the community's resilience to disasters by providing an enhanced facility with state-of-the-art emergency rescue equipment, specialized training and community engagement that will lessen the impact of future flood events and reduce the long-term risk of loss of life and injury. Additionally the campus is located in an LMI neighborhood and will thereby increase its response time to the surrounding community. |
| Address the current and future risks as identified in the mitigation needs assessment in the MID areas | As shown in the mitigation needs assessment in this section, the MID areas are at greatest risk of flooding. The Fire Fighting & Suppression division responds to more than 3,000 alarms per year. Of these responses, generally 20% are for fires, 1.5% are vehicle extractions, 18% for hazardous conditions such as highwater rescues, and the remaining majority responses are for power lines downed during storms. The new campus will house specialized equipment such as boats for water rescues and utility trucks specific for highwater usage. |
| Be CDBG-eligible activities under Title I of the Housing and Community Development Act of 1974 | The Lake Charles Fire Department campus is eligible under 24 CFR 570.201(c): Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in § 570.207(a), carried out by the recipient or other public or private nonprofit entities. |
| Meet National Objective | The Lake Charles Fire Department campus project qualifies under the Low-Mod Area (LMA) national objective subcategory described under 24 CFR 570.208(a)(1). The service area for the Fire Department will be the entire City of Lake Charles which is 52.45% Low Moderate Income and is primarily residential. |

Per the FEMA-approved 2020 Calcasieu Parish Hazard Mitigation Plan (HMP) (https://www.cityoflakecharles.com/egov/documents/1632326172_58524.pdf) which covers the City of Lake Charles and found in the Local Mitigation Planning Handbook, this Action Plan proposes projects that will target "Structure and Infrastructure Projects – actions that involve modifying existing structures and infrastructure to protect them from a hazard or remove them from a hazard area, and also includes projects to construct manmade structures to reduce the impact of hazards." The proposed nonprofit/emergency shelter and triage center shall be constructed to be resilient, particularly flood and wind damage proof, to provide critical medical and counseling services to future natural catastrophe displaced residents of Lake Charles. This also complements actionable item in Calcasieu Parish's HMP stated as "CP9 Community Shelter Construction-Construct or retrofit existing facility to be utilized as a community shelter for the public throughout the parish to shelter public during disasters" for the entire Parish as well as the City of Lake Charles specific "LC18 Community Shelter Construction-Set up of community shelters for the public in the City of Lake Charles to shelter public during disasters".

The nonprofit and emergency shelter and triage center shall effectively address risks to indispensable services that enable continuous operation of critical business and government functions, and are critical to human health and safety, or economic security.

The table below is taken from the Calcasieu Parish FEMA-approved HMP of 2020. As activities in this Action Plan are to address severe storms, flooding, and tornadoes, the proposed projects address flooding which is the primary threat to Lake Charles and was evidenced by this particular storm event by the widespread geography of inundation and water depth. Flooding is shown to be at 100% probability risk in the future to Lake Charles which is critical when considering the proposed Lake Charles Fire Department Campus that is proposed to receive the entirety of the 15% mitigation set-aside funds. To corroborate this data, the National Centers for Environmental Information (NCEI) states that the 2019 flooding and tornado event caused by CPI adjusted value \$1.5B in damages to Baton Rouge and Lake Charles, with Lake Charles bearing the brunt of the deluge. "Torrential rainfall from thunderstorms across Louisiana and coastal Texas caused widespread flooding and resulted in hundreds of water rescues. Baton Rouge and Lake Charles experienced flood damage to thousands of homes, vehicles and businesses, as more than 12 inches of rain fell. Lake Charles also continues to recover from the widespread damage caused by Hurricanes Laura and Delta less than 9 months before this flood event." Similarly, the flooding of March, 2016 caused \$12.8 CPI adjusted damage in southern Louisiana. "A historic flood devastated a large area of southern Louisiana resulting from 20 to 30 inches of rainfall over several days. Watson, Louisiana received an astounding 31.39 inches of rain from the storm. Two-day rainfall totals in the hardest hit areas have a 0.2% chance of occurring in any given year: a 1 in 500 year event. More than 30,000 people were rescued from the floodwaters that damaged or destroyed over 50,000 homes, 100,000 vehicles and 20,000 businesses. This is the most damaging U.S. flood event since Superstorm Sandy impacted the Northeast in 2012." Furthermore to demonstrate the preponderance of flooding to be certain in Lake Charles, the August, 2016 flooding along the Texas/Louisiana border including Lake Charles caused \$2.9B CPI adjusted damage and NCEI states "Multiple days of heavy rainfall averaging 15 to 20 inches led to widespread flooding along the Sabine River basin on the Texas and Louisiana border. This prompted numerous evacuations, high-water rescues and destruction, as more than 1,000 homes and businesses were damaged or destroyed." [see [https://www.ncei.noaa.gov/access/billions/events/LA/1980-2023?disasters\[\]=flooding](https://www.ncei.noaa.gov/access/billions/events/LA/1980-2023?disasters[]=flooding)]

The table below also indicates wind (thunderstorms) and Subsidence/Coastal Land Loss as also a 100% probability of future hazard recurrence. Mitigation to wind damage is being addressed in all proposed housing, public facilities, and economic development projects in that all project design and construction will incorporate at minimum the Wind Resistant Provisions of the 2018 International Building Code. As far as Subsidence/Coastal Land Loss, the proposed entire direct CDBG-MIT allocation to the City of Lake Charles is insufficient to begin to address the cost of addressing this category and this issue must be addressed outside of the City proper and is a regional/statewide issue. Lake Charles actually is in the least impacted Subsidence/Coastal Land Loss region of the entire State of Louisiana as is shown in the figure that follows the map.

Table 23. Probability of Future Hazard Recurrence.

| Hazard | Calcasieu Parish (Unincorporated) | DeQuincy | Iowa | Lake Charles | Sulphur | Vinton | Westlake |
|----------------------------------|-----------------------------------|----------|------|---------------|---------|--------|----------|
| Drought | 12% | 12% | 12% | 12% | 12% | 12% | 12% |
| Subsidence/ Coastal Land Loss | 100% | <1% | <1% | 100% | 100% | 100% | 100% |
| Expansive Soils | <1% | <1% | <1% | <1% | <1% | <1% | <1% |
| Extreme Heat | 4% | 4% | 4% | 4% | 4% | 4% | 4% |
| Flooding | 100% | 32% | 24% | 100% | 60% | 40% | 32% |
| Sinkholes | <1% | <1% | <1% | <1% | <1% | <1% | <1% |
| Thunderstorms (Hail) | 32% | 32% | 32% | 32% | 32% | 32% | 32% |
| Thunderstorms (Lightning) | 60% | 60% | 60% | 60% | 60% | 60% | 60% |
| Thunderstorms (Wind) | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| Tornadoes | 88% | 88% | 88% | 88% | 88% | 88% | 88% |
| Tropical Cyclones | 36% | 36% | 36% | 36% | 36% | 36% | 36% |
| Tsunamis | <1% | <1% | <1% | <1% | <1% | <1% | <1% |
| Wildfires | 8% | 8% | 8% | 8% | 8% | 8% | 8% |
| Winter Storms | 16% | 16% | 16% | 16% | 16% | 16% | 16% |

Figure 4: New Subsidence Map. This GIS image can be found at <https://rock.geosociety.org/net/gsatoday/groundwork/G337GW/article.htm>

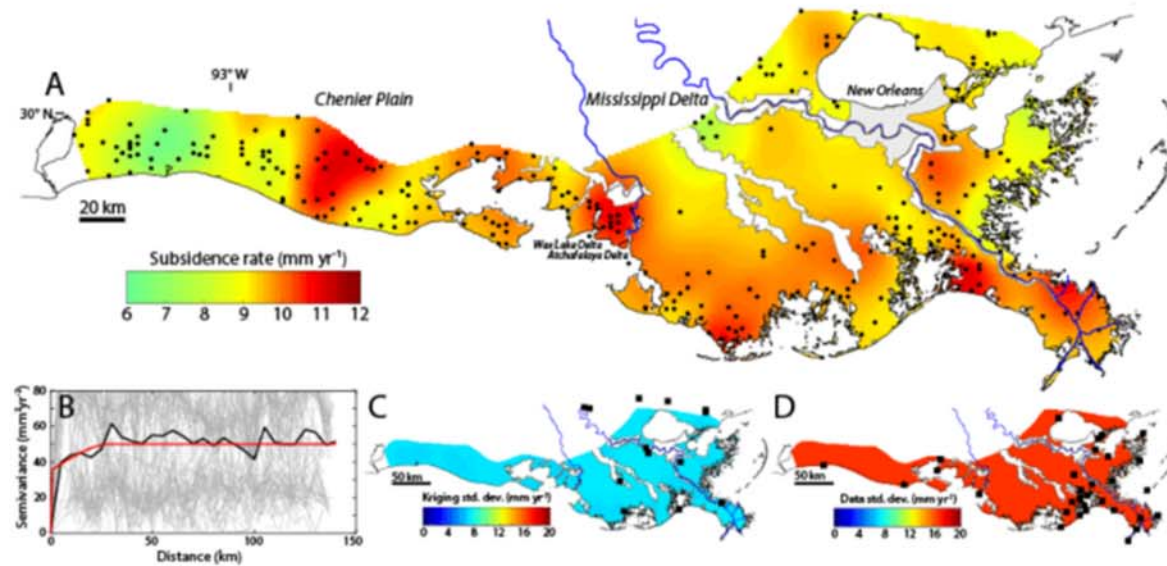


Figure 1. (A) Subsidence map for coastal Louisiana based on geostatistical interpolation (kriging) of 274 observations (black dots) of land-surface subsidence rates over the past 6–10 years. Areas in white and gray respectively, and located outside of the wetlands. (B) Semivariogram of the data using 100 draws from different kriging options (gray), the data mean (black), and the kriging model (red). (C) Uncertainty (kriging estimate). Black squares show GPS stations. (D) Uncertainty (standard deviation) of the underlying data. Black squares show National Oceanic and Atmospheric Administration (NOAA) tide gauge can easily be converted into a relative sea-level rise map by adding the climate-driven sea-level component.

3. General Requirements

Citizen Participation

Feedback from our community stakeholders and citizens is critical to program design and planning. The City of Lake Charles Community Development Division gives its citizens the opportunity to participate in the planning and development of this Action Plan. The City approaches citizen participation on both community-wide and neighborhood levels, and conducts all aspects of citizen participation in an open manner, with freedom of access for all interested persons. The City employs various media and communication resources, including social media, news media, and placement of notices at public facilities, to inform citizens about the opportunity to participate in the planning process regarding allocation of these federal dollars.

Outreach and Engagement

In the development of this disaster recovery Action Plan, the City of Lake Charles consulted with disaster-affected citizens, stakeholders, and other affected parties to ensure the consistency of disaster impacts identified in the plan, and to ensure that the plan and the planning process alike were comprehensive and inclusive. The Action Plan is available for viewing on the City's website (<https://www.cityoflakecharles.com/department/division.php?structureid=277>) or at the Community Development Department, located at 326 Pujoe Street, 5th Floor, during normal business hours, 8:00 a.m. to 4:30 p.m. Requests may be made for hard copies with a three day lead time to

print the plan after requesting a hard copy.

The primary methods for providing notice of opportunities to participate in planning and reporting processes are made in the local newspaper and the City's website <https://www.cityoflakecharles.com>. The City's website serves as a consistent source of information related to community development that the public can access at any time.

In the development of the Action Plan, the City provided a schedule of the planning process, including key dates such as public hearings, publication of the proposed plan, and comment periods, to targeted groups such as local non-profits (including those who serve storm survivors, elderly, disabled, limited English proficiency, low and moderate income, and other vulnerable populations), the City of Lake Charles Citizen Advisory Committee, and other interested parties via e-mail correspondence and City website postings. As of 1976, the last African-American focused newspaper closed in Lake Charles after a rich history of serving the community. Unfortunately since its closure there are no publications or other media outlets in southwest Louisiana that focus specifically on minority communities. There will be continuous outreach throughout the life of the CDBG-DR grant, especially if amendments are made to the Action Plan.

Public Hearings

As part of the initial Action Plan development process, the City of Lake Charles held two public hearings on November 15th, 2022. These public hearings were held in two locations: one at City Hall, and the other at another accessible public facility to ensure accessibility for persons with physical disabilities at both sites. The earlier meeting took place at the Allen P. August Multipurpose Center located at 2000 Moeling Street in Lake Charles which is in a R/ECAP and offered persons living in a disinvested area greater access to comment on the proposed Action Plan. The later meeting was held at the City Hall Council Chambers located at 326 Pujo Street. To accommodate as many people as possible, the City scheduled the meetings at 2:00 p.m. and 6:00 p.m. respectively. Due to the additional direct HUD allocation in the amount of \$7,042,000, the City had a third public hearing on March 16, 2023 at 2:00 PM at City Hall Council Chambers located at 326 Pujo Street. This meeting addressed additional projects to be funded in the second tranche of direct CDBG-DR allocation to the City. The site was easily accessible to public transportation.

The City had plans to accommodate translation for non-English-speaking residents and persons with disabilities if a request was made at least five days in advance. If the City could not accommodate a request, the City had plans to provide for non-English-speaking persons and persons with disabilities to participate such as providing simultaneous sign translators and interpreters (Spanish) upon request.

The City held a public comment period for 30 calendar days in which the public could provide written comments on the contents of the Action Plan. The City included any written comments received during the formal comment period and comments provided orally at public hearings in a summarized response incorporated into the documents submitted to HUD. Comments could be e-mailed to CommunityDevelopment@cityoflc.us or mailed to: Community Development Department, 326 Pujo Street, 5th Floor, Lake Charles, LA 70601.

The public notices and PowerPoint presentations are uploaded under Documents in DRGR.

Complaints

Any complaint regarding the City's planning efforts or CDBG-DR funded activities must be provided in writing and addressed to the Community Development Director. The City will evaluate the merit of each complaint and will make every effort to understand the reasons for the complaints and resolve them as soon as possible. The City will respond in writing to all written complaints within 15 business days of the receipt of the complaint. Complaints may be e-mailed to CommunityDevelopment@cityoflc.us or mailed to Community Development Department, 326 Pujo Street, 5th Floor, Lake Charles, LA 70601.

Complaints alleging the violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). The City will make detailed Fraud, Waste, and Abuse Policies and Procedures available to HUD and the public on the City's CDBG-DR website to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

Public Website

The City of Lake Charles will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, activity and program information described in this plan, and the details of all contracts and ongoing procurement processes. These items will be made available at <https://www.cityoflakecharles.com/department/division.php?structureid=277>.

Specifically, the City will make the following items available:

- The action plan created using the Disaster Recovery Grant Reporting System (DRGR), including all amendments
- Each Quarterly Progress Report (as created using the DRGR)
- Citizen participation plan
- Procurement policies and procedures
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts)
- A summary, including the description and status, of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted on a grantee's website.

In addition, the City will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. The City shall make all content available in a form accessible to persons with disabilities and those with limited English proficiency, or LEP. The City shall take reasonable steps to ensure meaningful access to their programs and activities by LEP persons, including individuals from underserved communities, and in a form accessible to persons with disabilities.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

Amendments

From time to time, the City will need to amend the information in one of its plans. Depending on the nature of the change, the amendment will be a substantial amendment or a non-substantial (minor) amendment. Substantial amendments will trigger the additional public participation processes outlined in the Substantial Amendment section and the Non-Substantial Amendment section of this Action Plan.

Substantial Amendment

The City will consider the following changes to constitute a substantial amendment to a disaster recovery Action Plan:

- Changes to priorities in how funds are allocated.
- Use of federal funds to undertake a project not previously described in the Action Plan.
- Changes in the use of CDBG funds from one eligible project to another if such changes exceed 25% of the total CDBG annual allocation.

Substantial amendments will trigger an additional public participation process, described below.

1. The City will post a draft of the proposed substantial amendment to its website.
2. The City will make reasonable efforts to conduct outreach via the local newspaper and City website, and through the representatives on the Citizen Advisory Committee.
3. The City will hold a 15-calendar-day public comment period to receive written comments on the content of the substantial amendment. The City will include any comment received during the public comment period in a summarized response incorporated into the Action Plan submitted to HUD.
4. Upon completion of the public participation process, the City will submit the amendment to HUD via the DRGR system.
5. After submission to HUD, the City will post the final adopted plan on the City's website.

Non-Substantial Amendment

If an amendment does not meet the definition of a substantial amendment, it is considered a minor amendment and will be included in the revised Action Plan. Interested parties wishing to comment on minor amendments may do so during the review of the plan.

Displacement of Persons and Other Entities.

The projects proposed in this Action Plan are expected to have no displacement effects on residents and businesses located within the City. While farms and related agricultural undertakings are required to be considered holistically in a CDBG-DR Action Plan, in this instance, there are no farms located within the identified MID area.

The proposed development of the non-profit center and separate business incubator will not cause any displacement. While site control is in flux at present, the City will only identify and consider sites that have been vacant for over two years or are considered blighted. Acquisition will more than likely occur, but the final identified site will not require relocation of businesses or individuals, and therefore will not trigger the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act (URA).

The proposed new construction of the age- and income-restricted Capstone at the Oaks elderly rental housing and the 1700-1800 Fitzenreiter LMI riverfront multifamily sites will also not trigger the URA. The Capstone site consists of nine-acres, is a non-historic church structure and a large, mostly undeveloped parcel that was devastated during the past three presidentially-declared disasters to impact the City of Lake Charles, and is deemed blighted and unsafe; nor has it been used for the past two years due to sustained damage. The Fitzenreiter riverfront site consists of blighted and vacant structures. No housing units or business will be impacted by this proposed development.

While the proposed projects are not expected to result in the displacement of residents, businesses or farms, the City will develop a Residential Anti-displacement and Relocation Assistance Plan (RARAP) that describes specific measures that will be taken to minimize displacement in CDBG-DR and MIT funded projects and comply with the Uniform Relocation Assistance and Real Property Acquisition Act (URA), Section 104(d) of the Housing and Community Development Act of 1974, as amended, and related waivers and the alternative requirements specified in the Consolidated Notice.

Protection of People and Property

Costs and Benefits of Resiliency Measures

The City of Lake Charles will document in program guidelines and project files how approved programs or projects will make communities more resilient against a future disaster. Within the file, the City will include a cost reasonableness and/or cost-benefit analysis of the activity, which will include the quantifiable benefits or description of the mitigation benefits of the project or program. This may include, but is not limited to, an analysis of:

- The risks to public health, safety, and well-being without the project or program.
- The costs against the anticipated value of the risk reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur.
- The contribution of the activity to a long-term solution to the problem it is intending to address.
- How the activity will protect the functionality of the project for its useful life and/or create manageable future maintenance and modification options.

Land Use Planning

The proposed projects have been preliminarily vetted to ensure conformance to the City of Lake Charles Zoning and Traditional Neighborhood Development ordinances. Considerations included and will guide 100% architectural and engineering design in conformance with Land Use Allocations as prescribed including, Utility and Drainage Servitudes, Garages and Secondary Dwelling Units (will not apply to proposed projects), TND Property Owners Association (will not apply), Architectural Standards, Open Space, Drainage, Landscaping, Setbacks, Lot and Block Standards, Street Design, Circulation, Parking Requirements, Signage, and Lighting.

Additionally, considerations such as floodplain/wetlands management and historic significance will be assessed and mitigated as necessary through the environmental review process under 24 CFR Part 58, which is required for all HUD-funded projects. As projects enter the design phase, the City will work with the developer and/or project owner to ensure compliance with all City, Parish and State land use and zoning requirements and that all permits and approvals are secured.

Projects shall also conform to the City's zoning ordinance, as amended, and specifically meet the following highlighted goals:

- Generally, develop an orderly, efficient and beneficial arrangement of land uses in relation to each other and to the circulation system.
- Conserve undeveloped land resources suitable for agriculture and recreational use.
- Prevent spreading of urban blight.
- Minimize traffic congestion resulting from new developments.
- Encourage new housing development to locate new employment centers and supporting services.
- Encourage "fill-in" development of vacant land.
- Discourage isolated rezoning.

Increasing Public Awareness of Hazards

The City recognizes that educating and informing the public about the risks of flooding and other natural disasters is an essential component of disaster mitigation. The City's primary strategy for outreach and education will be to coordinate with the Louisiana Watershed Initiative (LWI), a state agency dedicated to increasing the State's resilience to future flood events through initiatives such as data collection, planning, watershed and floodplain management projects, and public outreach. LWI's Risk Awareness and Education Program consists of "outreach and engagement to residents and students of all education levels to enhance public understanding of flood risk and resilience concepts, with the intent to nurture the next generation of resilience professionals and foster long-term support for sound development practices and consumer decisions. This program will also support the creation and dissemination of user-friendly tools and resources to help residents identify and understand flood risk at critical decision-points such as 1) prior to embarking on a real estate transfer, 2) prior to undertaking major home renovations, 3) prior to hurricane season. This program will seek to provide a basic level of 'flood risk literacy' to a broad swath of residents." The City will coordinate with LWI to assess current efforts within the City and Parish and identify next steps for expansion of outreach and education as necessary. Should the City find it necessary to allocate a portion of its DR or MIT funds to assist LWI with outreach efforts, a Substantial Amendment to this Action Plan will be completed.

The City's Communications Department will engage in outreach and awareness efforts, including promotion of the Calcasieu Parish Emergency Alert System, CalcaShout (www.calcashout.com) which is a free subscription service that delivers emergency alert information about a variety of disaster events that may occur within the Parish. Residents may choose to receive alerts via several different methods, and the Calcasieu Parish Office of Homeland Security and Emergency Preparedness offers a [Special Needs Assistance Program \(SNAP\)](#) to assist residents needing special accommodations in the case of an emergency response or evacuation effort.

Once it is operational, the Lake Charles Fire Training Campus will also provide emergency preparedness and resiliency outreach to residents.

The City will explore additional partnerships with agencies and organizations that provide recovery and resiliency outreach to residents and will ensure that all such communication is presented in an inclusive and accessible manner for individuals with disabilities and limited English proficiency. Communications materials will comply with Section 508 of the Rehabilitation Act, and documents will be translated according to the City's Language Access Plan (LAP) which is currently being rewritten and updated for not only this direct CDBG-DR allocation, but for its CDBG Entitlement, HOME Investment Partnerships Funds, as well as ESG funding.

Proximity to Natural and Environmental Hazards

Section 3.C.1.d of the Consolidated Notice requires grantees to evaluate the proximity of natural and environmental hazards (e.g., industrial corridors, sewage treatment facilities, waterways, EPA superfund sites, brownfields, etc.) to affected populations in the MID area, including members of protected classes, vulnerable populations, and underserved communities and explore how CDBG-DR activities may mitigate environmental concerns and increase resilience among these populations to protect against the effects of extreme weather events and other natural hazards. As part of the preparation of this Action Plan, the City of Lake Charles used the EPA EnviroAtlas Mapping Tool to determine the neighborhoods most burdened by natural and environmental hazards. As is evidenced in Figure 5 below, none of the proposed housing, public facilities, economic development, and public services sites are to be located near a Brownfields or superfund site. The green icons throughout the map below indicate registered POSSIBLE contamination sites such as gasoline stations, garages, and drycleaner. No proposed site shall place residents or users/visitors at risk.

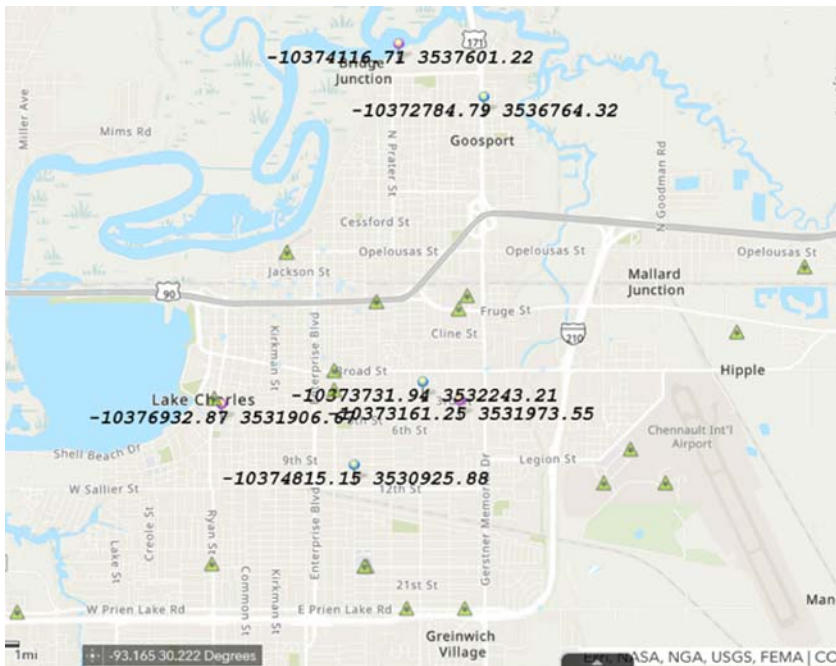


Figure 5: EnviroAtlas Hazards and Toxic Sites Map. This image is courtesy of <https://enviroatlas.epa.gov/enviroatlas/interactivemap/>

All proposed projects in this Action Plan have been preliminarily screened for environmental hazards. In addition to this screening, all projects and activities proposed in this Action Plan will be required to undergo an environmental review under 24 CFR Part 58, which will include a Phase I Environmental Site Assessment (ESA). Any pollution or contamination identified at or near the project sites that could have an adverse effect on either the project or its users will be appropriately remediated.

Ongoing Operations and Maintenance of Federally-assisted Projects

The City shall ensure that the Lake Charles Fire Department campus shall have an iterative five-year operations and maintenance plan built into the City's annual budget.

The nonprofit/triage center and the small LMI incubator business sites shall be monitored by the City to ensure that their operator's annual budgets include a standard and appropriately funded operations and maintenance budget including necessary standard and preventative maintenance.

The two proposed affordable housing developments shall be privately managed by the nonprofit housing developers and/or their contracted management firms. Once rent receipts are reconciled to outstanding debt service and investor distributions, requisite impounding and escrowing of funds for reserve replacement, vacancy and turnover contingency, general common area and landscape maintenance, and paying for contracted property management services, any residual receipts shall be deemed as Program Income and returned to the City of Lake Charles.

Elevation Standards

Elevation is required for all CDBG-DR assisted rehabilitation and reconstruction housing programs. The City is not considering or proposing any rehabilitation or reconstruction of housing units other than the Capstone at the Oaks project and Fitzenreiter riverfront project, which are located outside of a regulatory floodway and the one-hundred-year floodplain as identified by FEMA panel 22019C0485F, effective 02/18/2011. These projects are also new construction and would not require retrofit to meet elevation standards.

Flood Insurance Requirements

The Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) requires that projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Area (SFHA) must be covered by flood insurance under the National Flood Insurance Program (NFIP). In order to be able to purchase flood insurance, the community must be participating in the NFIP. Lake Charles does participate in the NFIP, with its Federal Information Processing Standards (FIPS) code being 22-41155. There are four statutory exceptions to this requirement:

1. Formula grants made to states
2. Self-insured, state-owned property within states approved by the Federal Insurance Administrator, consistent with 44 CFR 75.11
3. Small loans (\$5,000 or less)
4. Assisted leasing that is not used for repairs, improvements, or acquisition

In addition, HUD does not require flood insurance for a federal project consisting of minor repairs if all aggregated repairs cost less than the NFIP's maximum deductible of \$10,000.

The environmental review record for each proposed project in this Action Plan will include at least one of the following:

- Documentation supporting the determination that the project does not require flood insurance or is exempted from flood insurance
- A FEMA Flood Insurance Rate Map (FIRM) showing that the project is not located in a Special Flood Hazard Area
- A FEMA Flood Insurance Rate Map (FIRM) showing that the project is located in a Special Flood Hazard Area, along with a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance in the review

The proposed site of Capstone at the Oaks is the current Throne of Grace Church ministry located at 2401 6th St., Lake Charles, LA 70601. It and the Fitzenreiter Street riverfront site are not located within a FEMA-designated SFHA or regulatory floodway. Preferred sites considered for the development of the non-profit disaster recovery center and separate incubator will be outside of SFHAs and regulatory floodways.

Construction Standards

All projects with construction components funded through CDBG-DR funds will use high-quality materials and will meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. The projects will adhere to International Residential Code (IRC) 2012 as required and where appropriate. All CDBG-assisted housing must meet all applicable State and local housing quality standards and code requirements, and if there are no such standards or code requirements, the housing must meet the housing quality standards outlined in 24 CFR §982.401. The City must correct all deficiencies identified in the final inspection before HUD releases the final retainage.

Applications for residential construction undertakings will be required to meet the Section 8 Housing Quality Standards detailed under local Construction Standards, as well as the Fair Housing Accessibility Standards and Section 504 of the Rehabilitation Act of 1973. These developments must also meet all local building codes or standards that apply. In addition, substantial rehabilitation and the construction of new housing or replacement housing will follow Green Building Standards as defined by HUD.

The City of Lake Charles will promote the use of green infrastructure policies, as identified on the EPA's website (www.epa.gov/greenbuilding), for any infrastructure project undertaken using CDBG-DR funds.

Contractors Standards

The City of Lake Charles will maintain a contract registry of vendors, contractors, and subcontractors by date of procurement, type of procurement (e.g., micro-purchases, small purchases, requests for proposal, and sole-source and competitive bids), funding source, amount of the contract, and scope of work. The City will obtain an independent cost estimate for every procurement action prior to commencing procurement, and will post procurement opportunities pursuant to 2 CFR 200.318 - 200.326 and applicable Federal Register notices on its website. The City will select all bids, including cost reasonableness, and winning bidders according to federal and state statutes.

The City will actively reach out to small, minority-owned, woman-owned, veteran-owned, and Section 3 businesses, following its good faith efforts as extensively as possible to ensure their participation. The City will document compliance with its Section 3 policy on hiring local and LMI businesses. The City's procurement policies and procedures outline standards of conduct for employees engaged in the award or administration of contracts to prevent conflict of interest, and all employees involved in the administration and functioning of the CDBG-DR program are aware of them in order to comply with conflict of interest rules. The City will ensure that it makes no awards to a debarred contractor by checking the list of debarred contractors located at <https://www.sam.gov>. The City will make awards to the winning bidder following its procurement policy. Every award letter will include the 13 elements specified in 2 CFR §200.331.

If it makes subrecipient awards, the City will conduct due diligence on the following elements prior to making awards: financial stability; management systems in place to ensure compliance with federal and State requirements; history of prior performance; prior audit findings and resolution; and ability to effectively implement statutory, regulatory, and other grant requirements. The City will prepare contracts with contractors and agreements with subrecipients and other government agencies, and will include a penalty clause for non-compliance pursuant to 2 CFR §200.338 in all contracts and subrecipient agreements. The City will negotiate contract terms and ensure that all contracts include provisions required under CDBG-DR, including performance requirements and period of performance or date of completion. All contracts must adhere to the cost principles outlined in 2 CFR §200.402-200.410.

The City will assign a contract monitor to each contract to monitor scope and performance, and post all contracts using CDBG-DR funds, and a summary of all contracts including those procured by the City or its subrecipients, on its CDBG-DR Program comprehensive website. The City will also post the status of all services and goods that it is currently procuring to its CDBG-DR website.

The City's contract monitors will ensure that all construction contracts require bonding and insurance on work involving large construction contracts. The monitors will also ensure compliance with Davis-Bacon and Related Acts (DBRA). They will vet and review all future contract amendments to confirm that they are reasonable, necessary, and appropriate.

As this Action Plan does not propose any individual homeowner repair, rehabilitation, reconstruction, or elevation, the issue of fraud and poor construction quality perpetrated on an individual homeowner will not be evidenced. The City will monitor at every phase of new construction of the proposed housing, public facilities, and economic development capital projects prior to draw requests and payments being made to any solicited and successful offerors that construction milestones have been achieved within budget, scope, and stated timelines and shall fully exercise its rights contained in any construction contract should any issue arise.

The City shall adhere to and iteratively make available its Anti-Fraud/Waste/Abuse policy which includes telephone numbers and email addresses for any concerned party to report potential fraud, waste, and abuse and will immediately act upon any such referrals or allegations.

Preparedness, Mitigation and Resiliency

The City of Lake Charles is committed to both addressing immediate recovery needs and planning for improvements to resilience that will provide long-term recovery benefits and mitigate the impacts of future storms. The recovery programs outlined in this Action Plan contribute significantly to the City's overarching strategy for long-term recovery and resilience.

The flagship proposed project that will use 100% of the 15% mitigation set-aside funds is the Lake Charles Fire Department Campus. It will have an indisputable tie to one of FEMA's seven community lifelines by being at the ready in future natural disasters to effectively respond to critical safety needs of future storm survivors. In addition, this project will meet the definition of mitigation as stated in Section IV.A.2 of 87 FR 31636 which defines mitigation activities as activities that "increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters." Furthermore, this activity will address the current and future risks as identified in the grantee's mitigation needs assessment in the MID areas, is eligible under Title I of the Housing and Community Development Act of 1974, and meets a national objective under 24 CFR 570.208.

The non-profit disaster response center as proposed would provide a synergistic and collaborative space for Citywide non-profits to plan and prepare for present and future urgent needs, thereby facilitating more efficient disaster response and recovery.

In addition, the City anticipates funding at least one, if not multiple, workforce development projects that will focus on developing LMI individuals' skillsets to meet the local economy's needs give this disadvantaged population paths toward economic success. Like any other jurisdiction across the U.S., Lake Charles must be nimble to address its changing workforce needs and local landscape. The better trained and prepared a workforce is, the less impact a disaster has over the long-term recovery period. For this reason, a disaster triage center would allow the City to prepare for and address future disasters by being able to rapidly screen each household's specific needs for temporary housing, medical care, and other resources. These screenings will allow the City and its partners to refer the impacted households to suitable and appropriate shelters or temporary housing, which will mitigate the disruption posed by future storm events.

Any rehabilitation work or construction required for the non-profit center, the business incubator, the Fitzenreiter Street riverfront housing site, or the elder LMI-restricted housing at Capstone at the Oaks will incorporate resilient construction standards to help them withstand physical damage from future storms, thereby mitigating the impact of these storms.

Broadband Infrastructure in Housing

The City's proposed elder and all age LMI housing sites, Fitzenreiter Street Riverfront development and Capstone at the Oaks, are subject to and will comply with HUD's broadband infrastructure requirements for housing. The future solicitation to select an architecture and engineering firm will include this requirement in the design of the structures. CDBG-DR affordable housing being developed, rehabilitated, and reconstructed outside of the CDBG-DR allocation specific to this Action Plan are subject to the same conditions, but are not cited in this Action Plan.

Cost-Effectiveness

The process for identifying duplication of benefits (DOB) includes verifying necessary and reasonable costs. This helps to ensure that funds are used efficiently and effectively. The determination of necessary and reasonable costs will apply to any project or program receiving funding, and to administrative and planning funds as well. The City will use the cost principles described in 2 CFR Part 225 (OMB Circular A-87) to determine cost necessity and reasonableness. According to 2 CFR part 225, "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made." To ensure responsible use of public funds, the City of Lake Charles will follow these principles and fund only project costs that are deemed necessary and reasonable through an independent cost estimate (ICE) at the time of project application submission and through a cost-reasonableness determination and memorandum at the time of 100% design of structures.

Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving federal funds for any part of a loss for which they have already received financial assistance under any other program, private insurance, charitable assistance, or other source. Such duplicative funding is called duplication of benefits (DOB). This prohibition, laid out in the Stafford Act, as amended, adds a significant layer of regulation not included in the City's entitlement CDBG program. The City will comply with this new regulation for its CDBG-DR grant.

Pursuant to the Stafford Act, the City will establish and follow policies and procedures to safeguard against DOB within its program guidelines for each eligible activity. Because prevention of DOB is especially critical in the context of housing programs, the City has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential project awards prior to the award actually being made. The currently proposed economic development project does not have the potential for duplication of benefits. The elder affordable housing site will undergo a stringent verification of benefits process to ensure that no federal, insurance, publicly subsidized, state, local, or other sources of funding were provided to the project that would create a duplication of benefits.

During the application period and eligibility determination, the project manager will document the sources of funds received or approved from private insurance, SBA, FEMA, and volunteer organizations (including in-kind assistance) used for the same purpose for which the CDBG-DR award is intended. Once sources have been identified, and after determining an applicant's remaining unmet recovery need, the City will deduct any funds previously received for the same recovery need, except where those funds were spent on activities allowable per Stafford Act and HUD guidance (sometimes referred to as allowable activities). Allowable activities will not result in a reduction of the final award. Additionally, per the Federal Register Notice and longstanding HUD guidance, forced mortgage payoffs will not be considered duplicative, as those funds were never available to the applicant.

The City understands that applicant benefits from FEMA, SBA, and insurance can be a moving target due to additional funds being received much later than initial payouts, or due to appeals and litigation. Furthermore, not all funding sources may be known at the time of application. Therefore, the City of Lake Charles will continuously monitor program applications and perform its due diligence to verify any benefits that may have been acquired from FEMA, SBA, private insurers, charitable contributions, and any other available financial assistance after the date of application. Late or additional benefits from other sources can also result in a change to the final award amount for which an applicant is ultimately eligible. Applicant awards may have to be adjusted as new funding sources are identified to prevent DOB and minimize recapture.

The City has already secured FEMA and SBA data that it will use as a part of its DOB analysis, and is working to put agreements in place in order to obtain updated data feeds. Furthermore, the City has already established relationships with volunteer organizations that have provided assistance to disaster-affected citizens. The City will work to leverage these relationships and applicant release forms to obtain additional DOB data from philanthropic sources.

As a part of its grant management process, the City will require each project application to include an Application for Assistance that will include an income certification, insurance certification and release, philanthropic release of information, and a subrogation agreement, all of which will become part of each applicant's record. These documents will hold each project that is approved and funded accountable for the accuracy of the information provided, and will also give the City recourse if it is determined at a later time that projects received other financial assistance not identified at the time of application.

4. Grantee Proposed Use of Funds

Overview

The City of Lake Charles Department of Community Development is the lead agency and responsible entity for administering the Disaster Relief Supplemental Appropriations Act, 2022 (PL 117-43) CDBG-DR funds allocated for disaster recovery. Based on the unmet needs assessment and input from impacted communities throughout Lake Charles, the City has prioritized programs that will help it to meet the short- and long-term recovery needs of its residents and communities and to increase resilience against climate impacts. The City's initial analysis indicates unmet need in three core recovery categories: housing, infrastructure, and economic revitalization.

The largest recovery need is for housing assistance, followed by infrastructure and economic revitalization. To reflect these findings, the City intends to use CDBG-DR funding to support recovery programs that will complement one another. Furthermore, by implementing resilience measures across all programs, the City aims to facilitate recovery that results in improvements for a wide portion of Lake Charles' population, leading to greater housing, infrastructure, and economic features that can better withstand the impacts of future disaster.

The City has allocated the largest portion of funding to support the public facilities sector, as other State and federal funds are not currently dedicated proportionally to serve this unmet need and are instead concentrated on housing and infrastructure projects. The economic revitalization proposed project included herein aims to support the City's long-term recovery in the following way:

- Provide funding for the construction of a new Emergency Response Recruitment/Training/Operations center that would enhance public safety during future storm events. The targeted site is also blighted, and the demolition/clearance/new construction would also address the National Objective of blight elimination. This undertaking is also in one-hundred percent alignment with one of the seven FEMA Community lifelines that qualify use of the entire 15% mitigation set-aside funds, meets the definition of a mitigation activity under Section IV.A.2 of 87 FR 31636, addresses the current and future risks as identified in the grantee's mitigation needs assessment in the MID areas, is eligible under Title I of the Housing and Community Development Act of 1974, and meets a national objective under 24 CFR 570.208.
- Provide assistance to small businesses that provide income-producing jobs to LMI residents of the disaster-impacted communities. Training and preparing a workforce with skillsets and knowledge will fuel the local economy and provide career paths while also enabling building of household wealth. This will move households out of financial insecurity and help them become more resilient to future natural and economic catastrophes.

The residual portion of funding has been allocated to assist in the development of affordable housing. The May 17, 2021 flood and tornado event caused significant levels of damage to owner-occupied and rental housing within the City. Based on the City's review of the most recent data obtained from FEMA and SBA, the substantial unmet need for safe, decent, and affordable housing is a top City priority, which is why the City has prioritized funding for housing, specifically for low-to-moderate income limited clientele (LMC)—in this case, elderly individuals who are at greater risk in future storm-related and economic catastrophes. The City has allocated a proportion not equivalent to the unmet needs described above. The approximately 6% of programmatic funding will allow for leveraging other funds by a 24:1 ratio. The proposed housing project included herein aims to support the City's long-term recovery in the following way:

- Provide affordable income- and age-restricted sanitary, decent, and affordable housing to LMI households that is designed and constructed with catastrophe-resilient standards and that includes broadband accessibility.
- All applicants to these newly developed properties shall be initially third-party verification screened for income, family composition, and local residence/work preference and must maintain income eligibility during residential tenure once approved. These properties shall be deed restricted and maintained as LMI housing for a minimum of 25 years.

All of the affordable housing, public facilities, and economic development construction programs shall include mitigation features in their conceptual planning and construction and some specific mitigation-only activities that complement FEMA's community lifelines to ensure compliance with the minimum 15% mitigation set-aside requirement. The affordable housing programs (construction) shall include the highest-wind rating in exterior materials used, backup generators to provide power for up to two weeks post future disaster, and locations are situated outside of the one-hundred year floodplain.

a. Program Budget

| Program Category | Program | Budget | HUD identified MID Budget | Grantee identified MID Budget | % of Allocation | Maximum Award | National Objective | Estimated Outcome |
|------------------|------------------|----------------|---------------------------|-------------------------------|-----------------|----------------|-----------------------|--|
| Housing | Rehab | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Buyout | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | New Construction | \$4,145,000.00 | \$4,145,000.00 | \$4,145,000.00 | 23.26% | \$4,145,000.00 | LMI (LMC and Housing) | affordable housing for elderly and LMI residents |
| | Other | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |

| Program Category | Program | Budget | HUD identified MID Budget | Grantee identified MID Budget | % of Allocation | Maximum Award | National Objective | Estimated Outcome |
|-------------------------|--------------------------|------------------------|---------------------------|-------------------------------|-----------------|----------------|---|--|
| Economic Revitalization | Workforce Training | \$1,995,646.50 | \$1,995,646.50 | \$1,995,646.50 | 11.20% | \$1,995,646.50 | LMI (LMC and LMA); Slum/Blight (Spot Basis) | incubator will assist small businesses in creating/retaining LMI jobs and offer workforce training |
| | Business Grants | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$1,995,646.50 | \$1,995,646.50 | \$1,995,646.50 | 11.20% | \$1,995,646.50 | LMI (LMC and LMA); Slum/Blight (Spot Basis) | nonprofit hub will enable nonprofits to provide services to LMI areas before, during, and after a disaster event |
| Infrastructure | Water/sewer Improvements | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Health Facilities | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$4,336,307.00 | \$4,336,307.00 | \$4,336,307.00 | 24.34% | \$4,336,307.00 | LMI (LMC and LMA); Slum/Blight (Spot Basis) | Lake Charles Fire Department Campus. The construction of this facility will expand and improve public services being offered by the fire department and will benefit all of the residents in a primarily LMI area. |
| Public Services | Legal Services | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Housing Counseling | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| Mitigation | Mitigation | \$2,672,700.00 | \$2,672,700.00 | \$2,672,700.00 | 15.00% | \$2,672,700.00 | 15 | Acquisition, design, and construction of the Lake Charles Fire Department Recruitment, Training, and Operations center on blighted parcels |
| Admin | Admin | \$890,900.00 | \$890,900.00 | \$890,900.00 | 5.00% | \$890,900.00 | N/A | 0 |
| Planning | Planning | \$1,781,800.00 | \$1,781,800.00 | \$1,781,800.00 | 10.00% | \$1,781,800.00 | N/A | 0 |
| Total | | \$17,818,000.00 | \$17,818,000.00 | \$17,818,000.00 | 100.00% | | | |

Data Source(s): Table 24: Program Budget. The City of Lake Charles has proposed this budget to address the community's needs for this allocation.

Connection to Unmet Needs

Based on the unmet needs assessment and input from impacted communities throughout the City of Lake Charles, the City has prioritized programs that will help to meet the short- and long-term recovery needs of its residents and communities, in addition to increasing the City's resilience against climate impacts. The Disaster Relief Supplemental Appropriations Act requires that all CDBG-DR-funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity must meet all of the three following criteria:

1. Be CDBG eligible (or receive a waiver).
2. Meet a national objective as defined by 24 Code of Federal Regulations (CFR) .
3. Address a direct or indirect disaster impact in presidentially-declared impacted localities.

The City can address a disaster impact through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act (HDCA) of 1974, as amended. The recovery activities described herein will make full use of the three national objectives under 24 CFR 570.208, which include benefitting LMI persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Lake Charles. The entire City of Lake Charles is located in the storm-defined MID and the entire aggregated City census tracts and blocks are deemed LMI as the City population as a whole is found to be greater than 51% LMI. Proposed projects in this Action Plan are to benefit residents of the City and tie-back in their entirety to the storm through the development of affordable rental housing, economic development opportunities that promote the training/education of LMI individuals and promote the economic growth of small businesses that hire and retain LMI individuals, and future emergency preparedness unmet needs. In addition, each proposed project is also seeking to eliminate blight and to include two national CDBG objectives. All project proposed and contained within this Action Plan also will integrate a facet of mitigation and resilience to meet the 15% aggregate set-aside standard as promulgated by federal grant guidelines and in fact the resultant projects are anticipated to exceed the minimum 15% threshold. While the entirety of the 15% mitigation set-aside shall be exclusively used in the Lake Charles Fire Department Campus which supports one of the FEMA community lifelines and meets HUD's definition of a mitigation activity under Section IV.A.2 of 87 FR 31636, the City shall in addition go beyond the 15% set-aside threshold when factoring in the resilient construction features of the three affordable multifamily housing projects as well as the attributable square footage in the Nonprofit Hub that shall pull double duty as an emergency shelter triage site. It can be conservatively estimated that when aggregating these projects in total, an estimated 27-32% of this specific allocation shall constitute mitigation undertakings that support FEMA's community lifelines of Safety and Security - Law Enforcement/Security, Fire Service, Search and Rescue, Government Service, Community Safety and Food, Water, Shelter - Food, Water, Shelter, Agriculture.

Leveraging Funds

The City of Lake Charles fully understands the need to maximize the recovery value of limited resources. As illustrated by the substantial unmet needs identified in this Action Plan, the costs to fully recover and become more resilient during future storms far outweigh the available funding. Therefore, the City of Lake Charles has made it a priority to leverage multiple sources of funding wherever possible, to support the greatest potential recovery and to provide the greatest resilience benefits. The City will prioritize projects in which other federal, state, and local funding sources can be leveraged to allow CDBG-DR funding to pay only a portion of project costs. This strategy will allow the City to use limited CDBG-DR funding to support the maximum number of programs and projects. As part of this Action Plan, the City of Lake Charles is initially prioritizing the use of CDBG-DR funding as local match for two projects—one with pending State, federal, and housing tax credit financing in excess of \$64 million, which represents close to 3.5 dollars leveraged for each dollar of the proposed CDBG-DR match as described in this Action Plan.

In addition, since the first recovery efforts began, the City has pursued and used numerous resources to advance critically important recovery projects. These resources have contributed to significant recovery achievements, and have allowed for these CDBG-DR funds to be used to assist with needs that are not supported by other available sources.

Program Partners

For the non-profit disaster response center, the City will partner with a non-profit agency to rehabilitate and make improvements to an existing facility. The partner non-profit will own and operate the facility. The City will work with non-profit organizations such as Volunteers of America, the American Red Cross, Salvation Army, and local municipal emergency preparedness and response agencies via the disaster response triage center to maintain and improve their immediate response capabilities and their abilities to serve in a future disaster. The City also plans to work extensively with local higher education institutions, the public school system, local chambers of commerce, and any organizations with vested interest in community workforce development to improve and develop workforce training projects.

Distribution of Funds

The City of Lake Charles will implement all programs at this time, unless noted otherwise in the respective program descriptions. The City may allocate additional funds to projects through future Substantial Action Plan Amendments based on its continued assessment of unmet needs, mitigation needs, and available funding. The programs established in this Action Plan are not entitlement programs and are subject to available funding.

Program Income

The City will re-allocate any program income resulting from programs or projects derived from CDBG-DR funds to the purposes stated in this Action Plan. By doing so, the City will ensure that program income will support the continuing recovery process of the City of Lake Charles and allow it to accomplish the maximum benefits from its CDBG-DR funds. We do not expect that the non-profit and business incubator will generate any program income. The Capstone at the Oaks elder income-restricted affordable housing and the proposed general income restricted multifamily rental property in the 1500-1700 block of Fitzenreiter Street sites will generate minor program income after deducting operations and maintenance, loan/debt servicing, investor dividends, and reserve replacement fund capitalization. Any residual receipts based on the fact that CDBG-DR will account for only 3.6% of the total construction and acquisition budget will be booked as program income and used by the City of Lake Charles for future affordable housing development revolving loan fund and accounted for in its annual budget for entitlement CDBG as well as being first expended on like projects.

Resale or Recapture

Resale requirements will ensure that for the duration of the affordability period, the CDBG-DR–assisted housing units can only be purchased by an entity that will ensure that the original or a new extended affordability clause is complied with, and that will not violate the original restrictive affordability uses and period. Recapture provisions will ensure that the City of Lake Charles recoups all or a portion of the CDBG-DR assistance to the project during the period of affordability. The recapture requirement would be triggered by a sale (voluntary or involuntary) of the assisted project. The amount recaptured cannot exceed the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than CDBG-DR funds). The City of Lake Charles has various options to consider in determining the amount recaptured, which can be accessed at 24 CFR Part 92.254 for more detail. The City’s agreement with the non-profit housing agency that will own the Capstone at the Oaks and Fitzenreiter Street properties must stipulate the City’s recapture approach.

Program Details

Of the estimated \$37 million budget for the Capstone at the Oaks affordable elder housing, the City anticipates that \$1,345,000 will be composed of CDBG-DR funds as outlined in this Action Plan. Although it may vary depending on other funding brought to bear on this project, the property will have at a minimum a restrictive affordability period of no less than 20 years, during which time only 100% eligible LMI households will benefit. Should any provisions promulgated in the future affordability agreement be violated, or the property be sold and not used as an income-restricted rental property for the remainder of the affordability period by the new owner/operator, HUD will recapture its funding on a pro-rated basis.

The non-profit disaster recovery center will be eligible for its primary use only to residents and non-profits of Lake Charles. As Lake Charles has over 51% LMI persons, the site will benefit the residents of Lake Charles by presumption of benefitting the low-to-moderate-income area (LMA). Similarly, local partners will own and operate the business incubator and will provide services only to low-income residents of Lake Charles.

The proposed riverfront project located in the 1500-1700 block of Fitzenreiter Street shall consist of 72 elder units and 76 units of general multifamily development. The parcel consists of twenty (20) acres and all units to be constructed shall be first floor units that lend themselves to Section 504/ADA compliance as well as many principles of universal design. At present there is partial site control with the final parcel to be acquired by the City in the near future. The estimated construction phase would be sixteen (16) months and the total project cost is \$45 million, where over \$40 million shall be funded through LIHTC, private conventional mortgage and other sources. All units shall be permanently restricted to rental by eligible LMI households.

Affordable Housing

Housing is a priority for the City and HUD as an eligible activity. All affordable housing activities seek to prioritize and serve underserved community areas and protected classes through extensive public outreach and community feedback conducted during the public comment period and community sessions prior to Action Plan approval. All housing activities for the City of Lake Charles will seek to prioritize low to moderate income beneficiaries first and will prioritize projects that mitigate and create resilience against future disasters. There is no requirement that individuals have been directly affected by the storm in order to reside in the affordable housing developments described below. Rather, these projects are generally intended as replacement housing for units damaged or destroyed in the storm and as such, the storm tieback is indirect. As described in Section 2.6, the City conducted an assessment to determine the need for public services to help program beneficiaries enroll in and access CDBG-DR assistance. Individuals requiring assistance with application and intake for all CDBG-DR funded affordable housing projects will be provided case management support, disability accommodations and translation services as necessary to reduce or eliminate barriers to participation. As a condition of funding, the project owner(s) must agree to tenant income and rent affordability restrictions as required by Consolidated Notice. The process of recording and enforcing those requirements will be described in the program policies and procedures as well as in the loan documents for each project. At a minimum, the affordability period will be in compliance with HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(e).

The following are shovel-ready or eligible project opportunities that require additional funding assistance, do not have all of their funding sources currently secured or identified and therefore have an unmet need, and support general affordable housing and disaster recovery priorities stated above. The City of Lake Charles has determined that local non-profit or municipal agencies and developers have the capacity and are eligible to be subrecipients to manage and implement these projects with the support of the City. Note that funding amounts are based on unmet need in the project’s capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

Eligibility criteria to reside in the housing units for each of these projects will be published in the CDBG-DR Affordable Housing Policies and Procedures.

The City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as the African American community, vulnerable populations, and individuals from underserved communities. The City will work with these community organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

Capstone at the Oaks

Capstone at the Oaks is an affordable housing project led by the developer The Banyan Foundation. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested to fill funding gaps in the acquisition, design, and new construction of committed affordable 1- and 2-bedroom units in an elder multi-family housing complex by a community-based development organization (CBDO) located at 2401 6th Street, Lake Charles, LA 70601. The property is not in a Special Flood Hazard Area. Control of the site is through an Option to Purchase. The Louisiana Housing Corporation will be providing other funding for the project through their Multifamily Piggyback/CDBG-DR Loan Funding 2022 Piggyback Resilience Initiative – Mixed-Income (PRIME 2) program.

Capstone at The Oaks will consist of 120 units, with an estimated unit mix 66 one bedrooms and 54 two bedrooms. Capstone at The Oaks will have a community facility and will offer supportive services and resources for the aging community. These services are to be provided by the Calcasieu Council On Aging (CCOA), an established organization that seeks to benefit the quality of life of all elderly members of Calcasieu Parish, no matter their socioeconomic status. Such programs may include, but not limited to transportation, financial and health seminars, access to connecting residents with supportive medical services in the community and recreational activities. This will be a 100% Tax Credit development with incomes averaging at or below 60% of the Area Median Income. The project is located within a short distance of grocery stores, hospital/doctor offices, pharmacy, library, bank, schools, shopping and churches and other amenities that will enhance the quality of life of all members of the proposed development. The development will be all new construction. The design features, services, and amenities will include 45 year extended affordability, Energy Star appliance packages in each unit, on-site management, community facility with kitchenette, accessible community space, security cameras, green building and many other features. The development of Capstone at The Oaks will not only provide housing for an underserved population, but will also help to play an important role in revitalizing the Lake Charles community by bringing its elderly members home to their beloved community.

Calcasieu Heights

Calcasieu Heights Senior Village is an affordable housing project led by the developer MGM Development Group. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested to fill funding gaps in the design and new construction of 72 units restricted to adults aged 55 and older in the northern area of Lake Charles in the 1700-1800 block of Fitzenreiter Street. The property is not in a Special Flood Hazard Area. The developer has site control of the land. In addition to private funding secured for the project, the Louisiana Housing Corporation will be providing additional funding for the project through their Multifamily Piggyback/CDBG-DR Loan Funding 2022 Piggyback Resilience Initiative – Mixed-Income (PRIME 2) program.

The project will target senior households with incomes up to 20%, 50%, 60% and 80% of Area Median Income (AMI). The site will include four units operating under the Louisiana Permanent Supportive Housing (PSH) program that will offer rental assistance that enables tenants to pay income-based rents equal to 30% of their adjusted gross incomes. These units may be occupied by extremely low-income persons with disabilities (20% AMI). The unit mix will include 12 one-bedroom garden units and 60 two-bedroom garden units.

The community center will include on-site management offices, a fitness center, computer center, community kitchen and activity room. Outdoor amenities will include a playground, community garden and a barbecue/picnic area. The subject will include community Wi-Fi for remote medical monitoring partnerships with local health care providers.

Woodring Phase II

Woodring Phase II is an affordable housing project led by the developer HRI. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested in the form of a loan to fill funding gaps in the design and construction of a 40-unit multifamily LMI complex of committed affordable multifamily housing in two townhouse buildings to be constructed at 420 Mill Street and 601 Bilbo Street. The property is not in a Special Flood Hazard Area. The project will benefit LMI persons and will provide urban infill and revitalization of a long-vacant, underutilized downtown site.

The housing project is not age restricted. Thirty-two of the forty units will be set aside for individuals and families earning up to 60% of the area median income. The other eight units will serve individuals and families with incomes up to 80% of the area median income. The developer has site control through an executed purchase and sale agreement.

The CDBG-DR loan has a term of 35 years with 0% interest. This will be the third lien position following the senior first mortgage loan and the Louisiana Housing Corporation (LHC)'s subordinate loan in second lien position. \$325,000 shall be funded at financial closing; \$975,000 shall be funded upon 100% lien free completion. The City of Lake Charles loan will not be reduced shall there by any realized cost savings at project closeout. Instead, cost saving at closeout will reduce the principal amount of LHC's subordinate loan in second lien position. Debt service shall begin after project stabilization (loan conversion/8609 issuance) and shall be paid annually from 50% of the then remaining available surplus cash flow following:

1. Operating expenses;
2. Required deposits to the reserves;
3. First mortgage debt service;
4. The Investor's annual asset management fee (estimated to be \$5,000 and grown by 3% annually); and
5. Loan principal payments to LHC from 50% of available surplus cash flows after expenses outlined in 1 through 4.

Public Facilities

Fire Department Campus

The fire department campus, where the total 15% mitigation set-aside of this particular CDBG-DR allocation will be used to address one of FEMA's core community lifelines: Safety and Security - Law Enforcement/Security, Fire Service, Search and Rescue, Government Service, Community Safety. It is a public facilities project led by the City's Department of Public Works Engineering Division. This project addresses flooding which was the primary risk identified in the mitigation needs assessment on of this plan and serves as a mitigation activity. It is an eligible activity under 570.201(c) Public Facilities and Improvements; and

meets the National Objective for LMI Area Benefit. The construction of this facility will expand and improve public services being offered by the fire department and will benefit all of the residents in a primarily LMI area. During the severe flooding and tornado outbreak of May 17, 2021, the Lake Charles Fire Department along with the sheriff's department and National Guard was instrumental in deep water rescues of storm survivors. There are 12,311 properties in Lake Charles that have greater than a 26% chance of being severely affected by flooding over the next 30 years. This represents 48% of all properties in Lake Charles.

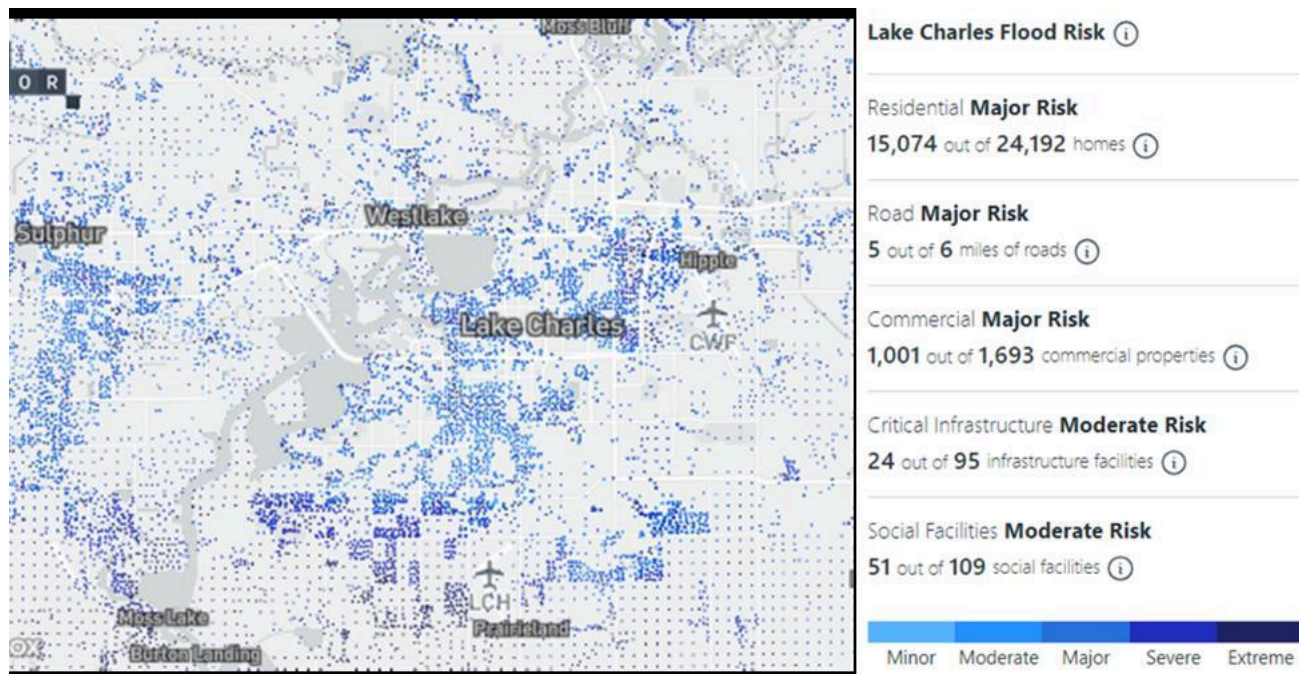


Figure 4: Risk Factor. Flooding map courtesy of https://riskfactor.com/city/lake-charles-louisiana/2241155_fsld/flood

In addition to damage to properties, flooding can also cut off access to utilities, emergency services, transportation, and may impact the overall economic well-being of an area. Overall, Lake Charles has a moderate risk of flooding over the next 30 years, which means flooding is likely to impact day-to-day life within the community. This is based on the level of risk the properties face rather than the proportion of properties with risk.

CDBG-DR funding is proposed to be used to fill the gap in the acquisition, design and construction of the campus. Other funding for the project is coming from City funds and FEMA 428 funds. The City has site control of the property located at 1201 6th Avenue which it purchased three years ago prior to the Floods and Tornadoes of May 2021. The site at the time of the purchase was vacant and purchased prior to the storm event therefore it does not trigger any URA considerations. The City has contracted a firm to develop the design plans for the campus and will be putting out a solicitation to secure a general contractor. This property is not located in a Special Flood Hazard Area (SFHA) or Non-Special Flood Hazard Area (NSFHA). However, it is located approximately one half-block from the nearest SFHA. To ensure the facility can continue to operate in the event of an unexpected flood at this site, floodproofing and other resiliency measures will be incorporated into the building construction.

The fire department campus project will bring multiple Lake Charles Fire Department assets onto a centralized campus; help with recruitment; provide workforce training; enhance public safety capabilities; and provide a venue for fieldtrips and community engagement activities. This upgrade and enhancement of Lake Charles emergency response capabilities will meet the HUD definition of a mitigation activity by increasing the City's resilience to future flooding and reducing long-term risk of loss of life and injury.

The City considered several potential uses for its 15% mitigation set-aside, including buyouts, critical infrastructure hardening/relocation, and natural infrastructure mitigation. As the State's allocations that are simultaneously serving Lake Charles and are significantly capitalized at the requisite funding levels for such large and expensive projects which far exceed this direct allocation, ultimately the City determined that the Lake Charles Fire Department Campus was the best use of these funds for the following reasons:

- Based on the mitigation needs assessment, which draws heavily on the Lake Charles Hazard Mitigation Plan, flooding is the primary risk to the City. The new Fire Department campus will be equipped to address flooding impacts and provide rapid rescues due to its centralized location and that it will house specialized equipment for high water rescues in which resident rescuer staff shall be trained
- This project is critically needed because the current fire department is lacking a centralized location that is suited for its growing service needs and specialized equipment as well as training needs of staff. The multiple aging sites that will be replaced by this facility cannot address future flooding and storm impacts to Lake Charles adequately and expeditiously.
- The project meets all four requirements for mitigation activities as described in the table on the Mitigation Only Activities section of this plan.

- The City already has site control for the property which will expedite project completion. This is important because the City is required to expend its CDBG-DR funds within six years of execution of its grant agreement with HUD. Large-scale construction projects can take time to complete, and identifying and securing an appropriate site can potentially add months or years to this process.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

This project will serve an area that includes large concentrations of vulnerable populations and protected classes. African American and LMI individuals and families will be the main beneficiaries of the enhanced rescue and emergency response services provided by the new Fire Campus.

*Projection of Expenditures uploaded.

Economic Development

For both economic development projects listed below, the City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as the African American community, vulnerable populations, and individuals from underserved communities. The City will work with these community organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

Business Innovation Center

Louisiana Chamber of Commerce Foundation's LAUNCH LA Business Innovation Center (BIC) is a small business incubator that will assist in creating and retaining LMI jobs. It will have an indirect tieback to the storm by helping to replace businesses and jobs that the community lost due to the storm impacts; is an eligible activity under 24 CFR 570.203(a) Acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements, including railroad spurs or similar extensions. Such activities may be carried out by the recipient or public or private nonprofit subrecipients and 570.201 (c) Public facilities and improvements. Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in [§ 570.207\(a\)](#), carried out by the [recipient](#) or other public or private nonprofit entities.. This activity meets the National Objective for LMI Jobs. Eligibility criteria for a business to receive assistance through the BIC will be published in the CDBG-DR Economic Development Project Policies and Procedures.

The City has site control of the property through acquisition of the land located at 1520 N. Martin Luther King Highway. The land is vacant and CDBG-DR funding is needed to fill the gap in construction of the building. The City will maintain ownership of the land and the nonprofit subrecipient will own the building and serve as the operator for the Center. Per FEMA firm map panel 22019C0320F (eff. Date 2/18/2011) the site is over 1,000 feet from the nearest SFHA zone along the Kayouche Coulee.

The Center will provide LMI small business owners technical support and training and empower networking to increase employment across the region. As required under the Low-Mod Jobs (LMJ) National Objective, a minimum of 51% of BIC employees, as well as all jobs created by businesses assisted by the incubator, will be LMI. The Center will offer workforce development services and will partner with local community based organizations to provide direct services to the LMI workers which will include assistance with basic needs and childcare. Outreach for enrollment in BIC services will be targeted to vulnerable populations and protected classes, and disability accommodations and translation services will be provided to reduce or eliminate barriers to participation.

The public benefit standards that normally apply to CDBG special economic development activities are waived per Section II.D.3 of the Consolidated Notice 87 FR 31636. However, in accordance with the requirements of the Consolidated Notice, the City of Lake Charles shall collect and maintain documentation in the project file on the creation and retention of total jobs; the number of jobs within appropriate LMI salary ranges and coded as Low Moderate Income Jobs (LMJ), as determined by the HUD's most current income limits by family composition ([FY 2023 Income Limits Documentation System -- Summary for Calcasieu Parish, Louisiana \(huduser.gov\)](#)); if a small business qualifies as LMCMC microenterprise and by presumption of the owner being LMI the employees would be deemed LMI as well, Low Moderate Income Area Benefit (LMA) by nature of the customer base, limited LMI clientele based on services (LMC); the average amount of assistance provided per job, by activity or program; and the types of jobs. Additionally, the City shall report the total number of jobs created and retained and the applicable national objective in the DRGR system.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

Nonprofit HUB

The Hope Center Nonprofit Hub will serve as a location for nonprofits to provide assistance to LMI areas before, during, and after a disaster event. It has an indirect tieback to the storm; is an eligible activity under 570.202(a)(4) Rehabilitation of nonprofit-owned nonresidential buildings and improvements not eligible under 570.201(c); and meets the National Objective for LMI Area Benefit. While the eastern portion of the parcel falls within a Zone A SFHA as found on FEMA firm 22019C0480F (eff. 2/18/2011), the structure will be situated outside of the SFHA. Consideration in design and construction will take into account floodproofing and resilience measures. Design and/or construction activities will include efforts to make this facility more resilient and physically accessible to the surrounding communities, including those with disabilities, during future storm events.

The nonprofit subrecipient Greater St Mary Community Development Foundation maintains site control of the property at 1801 Second Avenue and will serve as operator of the hub. The existing building at the site will be renovated to meet the needs of the Hope Center Nonprofit Hub. CDBG-DR funding is needed to fill the gap in the renovation. During past disasters (primarily flooding and wind), volunteers being able to provide meals to relief workers as well as the community at large has been problematic. After Hurricane Laura, volunteers with Operation BBQ Relief prepared home-cooked meals to deliver to victims of Hurricane Laura in Louisiana. The group's founder estimated they had made as many as 20,000 barbecue meals a day and were working out of the Super Walmart parking lot in Lake Charles. The new Hub will offer better ability to provide a meeting space, accommodations for relief workers, a commercial kitchen, shower, generator, communications center, and a food truck to serve the community after a disaster.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

Housing Program

Affordable Rentals

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|------------|-----------------|-----------------|------------------------------------|--|
| Parent | P-21-LC-22-LDZ1 | \$4,145,000.00 | \$0.00 | \$4,145,000.00 |
| Child | B-21-MF-22-0002 | \$4,145,000.00 | \$0.00 | \$4,145,000.00 |
| Child | B-22-MF-22-0002 | \$0.00 | \$0.00 | \$0.00 |

Narratives

- **Program Description**

Affordable Housing

Housing is a priority for the City and HUD as an eligible activity. All affordable housing activities seek to prioritize and serve underserved community areas and protected classes through extensive public outreach and community feedback conducted during the public comment period and community sessions prior to Action Plan approval. All housing activities for the City of Lake Charles will seek to prioritize low to moderate income beneficiaries first and will prioritize projects that mitigate and create resilience against future disasters. There is no requirement that individuals have been directly affected by the storm in order to reside in the affordable housing developments described below. Rather, these projects are generally intended as replacement housing for units damaged or destroyed in the storm and as such, the storm tieback is indirect.

As described in the Unmet Needs Assessment section of this Action Plan, the City conducted an assessment to determine the need for public services to help program beneficiaries enroll in and access CDBG-DR assistance. Individuals requiring assistance with application and intake for all CDBG-DR funded affordable housing projects will be provided case management support, disability accommodations and translation services as necessary to reduce or eliminate barriers to participation. As a condition of funding, the project owner(s) must agree to tenant income and rent affordability restrictions as required by Consolidated Notice. The process of recording and enforcing those requirements will be described in the program policies and procedures as well as in the loan documents for each project. At a minimum, the affordability period will be in compliance with HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(e).

The following are shovel-ready or eligible project opportunities that require additional funding assistance, do not have all of their funding sources currently secured or identified and therefore have an unmet need, and support general affordable housing and disaster recovery priorities stated above. The City of Lake Charles has determined that local non-profit or municipal agencies and developers have the capacity and are eligible to be subrecipients to manage and implement these projects with the support of the City. Note that funding amounts are based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive

application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

Eligibility criteria to reside in the housing units for each of these projects will be published in the CDBG-DR Affordable Housing Policies and Procedures. The three affordable rental housing projects will benefit vulnerable populations such as African Americans and provide equity in outreach and case management services.

Capstone at the Oaks

Capstone at the Oaks is an affordable housing project led by the developer The Banyan Foundation. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested to fill funding gaps in the acquisition, design, and new construction of committed affordable 1- and 2-bedroom units in an elder multi-family housing complex by a community-based development organization (CBDO) located at 2401 6th Street, Lake Charles, LA 70601. The property is not in a Special Flood Hazard Area. Control of the site is through an Option to Purchase. The Louisiana Housing Corporation will be providing other funding for the project through their Multifamily Piggyback/CDBG-DR Loan Funding 2022 Piggyback Resilience Initiative – Mixed-Income (PRIME 2) program.

Capstone at The Oaks will consist of 120 units, with an estimated unit mix 66 one bedrooms and 54 two bedrooms. Capstone at The Oaks will have a community facility and will offer supportive services and resources for the aging community. These services are to be provided by the Calcasieu Council On Aging (CCOA), an established organization that seeks to benefit the quality of life of all elderly members of Calcasieu Parish, no matter their socioeconomic status. Such programs may include, but not limited to transportation, financial and health seminars, access to connecting residents with supportive medical services in the community and recreational activities. This will be a 100% Tax Credit development with incomes averaging at or below 60% of the Area Median Income. The project is located within a short distance of grocery stores, hospital/doctor offices, pharmacy, library, bank, schools, shopping and churches and other amenities that will enhance the quality of life of all members of the proposed development. The development will be all new construction. The design features, services, and amenities will include 45 year extended affordability, Energy Star appliance packages in each unit, on-site management, community facility with kitchenette, accessible community space, security cameras, green building and many other features. The development of Capstone at The Oaks will not only provide housing for an underserved population, but will also help to play an important role in revitalizing the Lake Charles community by bringing its elderly members home to their beloved community.

Lake Charles understands the importance of partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. For this affordable housing project, the City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as African Americans, vulnerable populations, and individuals from underserved communities. The City will work with these populations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

Calcasieu Heights

Calcasieu Heights Senior Village is an affordable housing project led by the developer MGM Development Group. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested to fill funding gaps in the design and new construction of 72 units restricted to adults aged 55 and older in the northern area of Lake Charles in the 1700-1800 block of Fitzenreiter Street. The property is not in a Special Flood Hazard Area. The developer has site control of the land. In addition to private funding secured for the project, the Louisiana Housing Corporation will be providing additional funding for the project through their Multifamily Piggyback/CDBG-DR Loan Funding 2022 Piggyback Resilience Initiative – Mixed-Income (PRIME 2) program.

The project will target senior households with incomes up to 20%, 50%, 60% and 80% of Area Median Income (AMI). The site will include four units operating under the Louisiana Permanent Supportive Housing (PSH) program that will offer rental assistance that enables tenants to pay income-based rents equal to 30% of their adjusted gross incomes. These units may be occupied by extremely low-income persons with disabilities (20% AMI). The unit mix will include 12 one-bedroom garden units and 60 two-bedroom garden units.

The community center will include on-site management offices, a fitness center, computer center, community kitchen and activity room. Outdoor amenities will include a playground, community garden and a barbecue/picnic area. The subject will include community Wi-Fi for remote medical monitoring partnerships with local health care providers.

Lake Charles understands the importance of partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. For this affordable housing project, the City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as African Americans, vulnerable populations, and individuals from underserved communities. The City will work with these populations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

Woodring Phase II

Woodring Phase II is an affordable housing project led by the developer HRI. It has an indirect tieback to the storm; is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing. CDBG-DR funding is being requested in the form of a loan to fill funding gaps in the design and construction of a 40-unit multifamily LMI complex of committed affordable multifamily housing in two townhouse buildings to be constructed at 420 Mill Street and 601 Bilbo Street. The property is not in a Special Flood Hazard Area. The project will benefit LMI persons and will provide urban infill and revitalization of a long-vacant, underutilized downtown site.

The housing project is not age restricted. Thirty-two of the forty units will be set aside for individuals and families earning up to 60% of the area median income. The other eight units will serve individuals and families with incomes up to 80% of the area median income. The developer has site control through an executed purchase and sale agreement.

The CDBG-DR loan has a term of 35 years with 0% interest. This will be the third lien position following the senior first mortgage loan and the Louisiana Housing Corporation (LHC)'s subordinate loan in second lien position. \$325,000 shall be funded at financial closing; \$975,000 shall be funded upon 100% lien free completion. The City of Lake Charles loan will not be reduced shall there be any realized cost savings at project closeout. Instead, cost saving at closeout will reduce the principal amount of LHC's subordinate loan in second lien position. Debt service shall begin after project stabilization (loan conversion/8609 issuance) and shall be paid annually from 50% of the then remaining available surplus cash flow following:

1. Operating expenses;
2. Required deposits to the reserves;
3. First mortgage debt service;
4. The Investor's annual asset management fee (estimated to be \$5,000 and grown by 3% annually); and
5. Loan principal payments to LHC from 50% of available surplus cash flows after expenses outlined in 1 through 4.

Lake Charles understands the importance of partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. For this affordable housing project, the City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as African Americans, vulnerable populations, and individuals from underserved communities. The City will work with these populations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

- **Program Tieback to Disaster/Unmet Needs**

As a result of Hurricanes Laura and Delta, the Winter Storm of 2020, and the flash flood event of May 17, 2021, the Lake Charles community is experiencing significant struggles. The City has identified roughly 350 housing units were damaged by the events. Over 85% of critically damaged units are in LMI reas, with greater than 20% experiencing poverty. 60% of public housing is still offline. An estimated 8% of citizens (approximately 5,000 people) remain displaced.

In order to help meet these critical housing needs, the City is implementing the Lake Charles Homeowner Major Rehabilitation Program, the Louisiana Voluntary Buyout Program and Louisiana Restore Housing Assistance Program. The proposed construction of three low-to-moderate-income (LMI) multifamily rental housing complexes consisting of 232 units, will help to fill the gap to provide affordable housing to Lake Charles' most vulnerable citizens.

- **How Program will Promote Housing for Vulnerable Populations**

Eligibility criteria to reside in the housing units for each of these projects will be published in the CDBG-DR Affordable Housing Policies and Procedures.

The three affordable rental housing projects will benefit vulnerable populations such as African Americans and provide equity in outreach and case management services.

The proposed housing project included herein aims to support the City's long-term recovery in the following way:

Provide affordable income- and age-restricted sanitary, decent, and affordable housing to LMI households that is designed and constructed with catastrophe-resilient standards and that includes broadband accessibility.

All applicants to these newly developed properties shall be initially third-party verification screened for income, family composition, and local residence/work preference and must maintain income eligibility during residential tenure once approved. These properties shall be deed restricted and maintained as LMI housing for a minimum of 25 years.

- **Program Affordability Period (if applicable)**

25 years

- **Program Definition of Second Home/Eligibility**

Not applicable.

- **Program National Objective(s)**

LMI

- **Program Eligibility**

The project is an eligible activity under 570.201(m) Construction of Affordable Housing; and meets the National Objective for LMI Housing.

- **Program Responsible Entity**

The City of Lake Charles through a partnership with the Louisiana Housing Corporation will ensure the project requirements are in compliance with HUD and other cross-cutting regulations.

- **Program Maximum Assistance**

- **Program Estimated Begin and End Dates**

Planning and administration period began 5/17/2021.

The project start and end dates are 12/7/2023-12/7/2029.

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**

- Program Method of Distribution Description/Overview (if applicable)

- How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)

- How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)

Projection of Expenditures

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------------|--------|----------------------|------------------|-----------------------|-------------------|
|--------------|--------|----------------------|------------------|-----------------------|-------------------|

Projection of Outcomes

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|

Buyout Program

No Grantee Program(s)

Infrastructure Program

No Grantee Program(s)

Economic Revitalization Program

NonProfit Hub and Business Incubator

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|------------|-----------------|-----------------|------------------------------------|--|
| Parent | P-21-LC-22-LDZ1 | \$3,991,293.00 | \$0.00 | \$3,991,293.00 |
| Child | B-21-MF-22-0002 | \$1,995,646.00 | \$0.00 | \$1,995,646.00 |
| Child | B-22-MF-22-0002 | \$1,995,646.00 | \$0.00 | \$1,995,646.00 |

Narratives

- **Program Description**

Economic Development

Business Innovation Center

Louisiana Chamber of Commerce Foundation's LAUNCH LA Business Innovation Center (BIC) is a small business incubator that will assist in creating and retaining LMI jobs. It will have an indirect tieback to the storm by helping to replace businesses and jobs that the community lost due to the storm impacts; is an eligible activity under 24 CFR 570.203(a) Acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements, including railroad spurs or similar extensions. Such activities may be carried out by the recipient or public or private nonprofit subrecipients and 570.201 (c) Public facilities and improvements. Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in [§ 570.207\(a\)](#), carried out by the recipient or other public or private nonprofit entities. This activity meets the National Objective for LMI Jobs. Eligibility criteria for a business to receive assistance through the BIC will be published in the CDBG-DR Economic Development Project Policies and Procedures.

The City has site control of the property through acquisition of the land located at 1520 N. Martin Luther King Highway. The land is vacant and CDBG-DR funding is needed to fill the gap in construction of the building. The City will maintain ownership of the land and the nonprofit subrecipient will own the building and serve as the operator for the Center. Per FEMA firm map panel 22019C0320F (eff. Date 2/18/2011) the site is over 1,000 feet from the nearest SFHA zone along the Kayouche Coulee.

The Center will provide LMI small business owners technical support and training and empower networking to increase employment across the region. As required under the Low-Mod Jobs (LMJ) National Objective, a minimum of 51% of BIC employees, as well as all jobs created by businesses assisted by the incubator, will be LMI. The Center will offer workforce development services and will partner with local community based organizations to provide direct services to the LMI workers which will include assistance with basic needs and childcare. Outreach for enrollment in BIC services will be targeted to vulnerable populations and protected classes, and disability accommodations and translation services will be provided to reduce or eliminate barriers to participation.

The public benefit standards that normally apply to CDBG special economic development activities are waived per Section II.D.3 of the Consolidated Notice 87 FR 31636. However, in accordance with the requirements of the Consolidated Notice, the City of Lake Charles shall collect and maintain documentation in the project file on the creation and retention of total jobs; the number of jobs within appropriate LMI salary ranges and coded as Low Moderate Income Jobs (LMJ), as determined by the HUD's most current income limits by family composition ([FY 2023 Income Limits Documentation System -- Summary for Calcasieu Parish, Louisiana \(huduser.gov\)](#)); if a small business qualifies as LMCMC microenterprise and by presumption of the owner being LMI the employees would be deemed LMI as well, Low Moderate Income Area Benefit (LMA) by nature of the customer base, limited LMI clientele based on services (LMC); the average amount of assistance provided per job, by activity or program; and the types of jobs. Additionally, the City shall report the total number of jobs created and retained and the applicable national objective in the DRGR system.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

The City values partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. Through these partnerships, the City will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as African Americans, vulnerable

populations, and individuals from underserved communities either as small businesses wanting to participate in the incubator or potential employees for the businesses. The City will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

Nonprofit HUB

The Hope Center Nonprofit Hub will serve as a location for nonprofits to provide assistance to LMI areas before, during, and after a disaster event. It has an indirect tieback to the storm; is an eligible activity under 570.202(a)(4) Rehabilitation of nonprofit-owned nonresidential buildings and improvements not eligible under 570.201(c); and meets the National Objective for LMI Area Benefit. While the eastern portion of the parcel falls within a Zone A SFHA as found on FEMA firm 22019C0480F (eff. 2/18/2011), the structure will be situated outside of the SFHA. Consideration in design and construction will take into account floodproofing and resilience measures. Design and/or construction activities will include efforts to make this facility more resilient and physically accessible to the surrounding communities, including those with disabilities, during future storm events.

The nonprofit subrecipient Greater St Mary Community Development Foundation maintains site control of the property at 1801 Second Avenue and will serve as operator of the hub. The existing building at the site will be renovated to meet the needs of the Hope Center Nonprofit Hub. CDBG-DR funding is needed to fill the gap in the renovation. During past disasters (primarily flooding and wind), volunteers being able to provide meals to relief workers as well as the community at large has been problematic. After Hurricane Laura, volunteers with Operation BBQ Relief prepared home-cooked meals to deliver to victims of Hurricane Laura in Louisiana. The group's founder estimated they had made as many as 20,000 barbecue meals a day and were working out of the Super Walmart parking lot in Lake Charles. The new Hub will offer better ability to provide a meeting space, accommodations for relief workers, a commercial kitchen, shower, generator, communications center, and a food truck to serve the community after a disaster.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

The City values partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. Through these partnerships, the City and the nonprofits at the hub will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes such as African Americans, vulnerable populations, and individuals from underserved communities. The City will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The City may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in grant-funded recovery programs.

- **Program Tieback to Disaster/Unmet Needs**

Hope Center: It is an eligible activity under 570.202(a)(4) Rehabilitation of nonprofit-owned nonresidential buildings and improvements not eligible under 570.201(c); and meets the National Objective for LMI jobs. The Hope Center Nonprofit Hub will serve as a location for nonprofits to provide assistance to LMI areas before, during, and after a disaster event.

BIC: It is an eligible activity under 24 CFR 570.203(a) Acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements, including railroad spurs or similar extensions. Such activities may be carried out by the recipient or public or private nonprofit subrecipients and 570.201 (c) Public facilities and improvements.

Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in § 570.207(a), carried out by the recipient or other public or private nonprofit entities. This activity meets the National Objective for LMI Jobs.

- **Program National Objective(s)**

LMI

- **Program Eligibility**

This activity meets the National Objective for LMI jobs.

- **Program Responsible Entity**

Hope: Greater St. Mary Community Development Foundation

BIC: Louisiana Chamber of Commerce Foundation

- **Program Maximum Assistance**

- **Program Estimated Begin and End Dates**

Administration and planning started on 5/17/2021.

The project estimated period is 12/7/2023-12/7/2029.

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**
-

- **Program Method of Distribution Description/Overview (if applicable)**
-

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
-

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**
-

Projection of Expenditures

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------------|--------|----------------------|------------------|-----------------------|-------------------|
|--------------|--------|----------------------|------------------|-----------------------|-------------------|

Projection of Outcomes

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|

Public Facilities Program

Fire Department Campus

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|------------|-----------------|-----------------|------------------------------------|--|
| Parent | P-21-LC-22-LDZ1 | \$4,336,307.00 | \$0.00 | \$4,336,307.00 |
| Child | B-21-MF-22-0002 | \$4,336,307.00 | \$0.00 | \$4,336,307.00 |
| Child | B-22-MF-22-0002 | \$0.00 | \$0.00 | \$0.00 |

Narratives

- Program Description

Public Facilities

Fire Department Campus

The fire department campus, where the total 15% mitigation set-aside of this particular CDBG-DR allocation will be used to address one of FEMA's core community lifelines: Safety and Security - Law Enforcement/Security, Fire Service, Search and Rescue, Government Service, Community Safety. It is a public facilities project led by the City's Department of Public Works Engineering Division. This project addresses flooding which was the primary risk identified in the mitigation needs assessment section of this plan and serves as a mitigation activity. It is an eligible activity under 570.201(c) Public Facilities and Improvements; and meets the National Objective for LMI Area Benefit. The construction of this facility will expand and improve public services being offered by the fire department and will benefit all of the residents in a primarily LMI area. During the severe flooding and tornado outbreak of May 17, 2021, the Lake Charles Fire Department along with the sheriff's department and National Guard was instrumental in deep water rescues of storm survivors. There are 12,311 properties in Lake Charles that have greater than a 26% chance of being severely affected by flooding over the next 30 years. This represents 48% of all properties in Lake Charles.

In addition to damage to properties, flooding can also cut off access to utilities, emergency services, transportation, and may impact the overall economic well-being of an area. Overall, Lake Charles has a moderate risk of flooding over the next 30 years, which means flooding is likely to impact day-to-day life within the community. This is based on the level of risk the properties face rather than the proportion of properties with risk.

CDBG-DR funding is proposed to be used to fill the gap in the acquisition, design and construction of the campus. Other funding for the project is coming from City funds and FEMA 428 funds. The City has site control of the property located at 1201 6th Avenue which it purchased three years ago prior to the Floods and Tornadoes of May 2021. The site at the time of the purchase was vacant and purchased prior to the storm event therefor it does not trigger any URA considerations. The City has contracted a firm to develop the design plans for the campus and will be putting out a solicitation to secure a general contractor. This property is not located in a Special Flood Hazard Area (SFHA) or Non-Special Flood Hazard Area (NSFHA). However, it is located approximately one half-block from the nearest SFHA. To ensure the facility can continue to operate in the event of an unexpected flood at this site, floodproofing and other resiliency measures will be incorporated into the building construction.

The fire department campus project will bring multiple Lake Charles Fire Department assets onto a centralized campus; help with recruitment; provide workforce training; enhance public safety capabilities; and provide a venue for fieldtrips and community engagement activities. This upgrade and enhancement of Lake Charles emergency response capabilities will meet the HUD definition of a mitigation activity by increasing the City's resilience to future flooding and reducing long-term risk of loss of life and injury.

The City considered several potential uses for its 15% mitigation set-aside, including buyouts, critical infrastructure hardening/relocation, and natural infrastructure mitigation. As the State's allocations that are simultaneously serving Lake Charles and are significantly capitalized at the requisite funding levels for such large and expensive projects which far exceed this direct allocation, ultimately the City determined that the Lake Charles Fire Department Campus was the best use of these funds for the following reasons:

- Based on the mitigation needs assessment, which draws heavily on the Lake Charles Hazard Mitigation Plan, flooding is the primary risk to the City. The new Fire Department campus will be equipped to address flooding impacts and provide rapid rescues due to its centralized location and that it will house specialized equipment for high water rescues in which resident rescuer staff shall be trained
- This project is critically needed because the current fire department is lacking a centralized location that is suited for its growing service needs and specialized equipment as well as training needs of staff. The multiple aging sites that will be replaced by this facility cannot address future flooding and storm impacts to Lake Charles adequately and expeditiously.
- The project meets all four requirements for mitigation activities as described in the table on the Mitigation Only Activities section of this plan.
- The City already has site control for the property which will expedite project completion. This is important because the City is required to expend its CDBG-DR funds within six years of execution of its grant agreement with HUD. Large-scale construction projects can take time to complete, and identifying and securing an appropriate site can potentially add months or years to this process.

Note that the funding amounts for this project is based on unmet need in the project's capital stack, rather than setting a maximum award cap which would be more appropriate for a competitive application process. However, all projects will be underwritten and documentation placed in the project files to show that costs are necessary, reasonable and allocable in accordance with the cost principles of 2 CFR 200, Subpart E, and a duplication of benefits analysis will be completed for each project.

This project will serve an area that includes large concentrations of vulnerable populations and protected classes. African American and LMI individuals and families will be the main beneficiaries of the enhanced rescue and emergency response services provided by the new Fire Campus.

- **Program Tieback to Disaster/Unmet Needs**

- **Program National Objective(s)**

- **Program Eligibility**

- **Program Responsible Entity**

- **Program Maximum Assistance**

- **Program Estimated Begin and End Dates**

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**

- **Program Method of Distribution Description/Overview (if applicable)**

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Projection of Expenditures

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------------|--------|----------------------|------------------|-----------------------|-------------------|
|--------------|--------|----------------------|------------------|-----------------------|-------------------|

Projection of Outcomes

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|
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Public Services Program

No Grantee Program(s)

Mitigation Program

Lake Charles Mitigation Fire Department Campus

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|------------|-----------------|-----------------|------------------------------------|--|
| Parent | P-21-LC-22-LDZ1 | \$2,672,700.00 | \$0.00 | \$2,672,700.00 |
| Child | B-21-MF-22-0002 | \$2,672,700.00 | \$0.00 | \$2,672,700.00 |
| Child | B-22-MF-22-0002 | \$0.00 | \$0.00 | \$0.00 |

Narratives

- **Program Description**

- **How will Program Meet Definition of Mitigation**

- **How will Program Address Current & Future Risks/Mitigation Needs Assessment**

- **Program Tieback to Disaster/Unmet Needs (if applicable)**

- **Program National Objective(s)**

- **Program Eligibility**

• **Program Responsible Entity**

• **Program Maximum Assistance**

• **Program Estimated Begin and End Dates**

• **Other Program Details**

• **Program Competitive Application Overview (if applicable)**

• **Program Method of Distribution Description/Overview (if applicable)**

Projection of Expenditures

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------------|--------|----------------------|------------------|-----------------------|-------------------|
|--------------|--------|----------------------|------------------|-----------------------|-------------------|

Projection of Outcomes

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|--------|---------------------|----------------------|------------------|-----------------------|-------------------|
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5. Appendix

5.1 Certifications.

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:
 1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
 4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
- n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood-prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.



p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

*Signature:  *Date: 

Form HUD-424-B (02/23)

2023-04-27

5.2 Waivers (if applicable).

None requested at present.

5.3 Summary and Response of Public Comments.

The following provides a summary of public comments received for the *Lake Charles, LA, CDBG- Disaster Recovery Action Plan, grant number P-21-LC-22-LDZ1* in response to *4606-DR-LA/flash flood event of May 17, 2021/Louisiana Severe Storms, Tornadoes, and Flooding*, during the public comment period of *November 15, 2022 through December 16, 2022 and March 16, 2023 through April 16, 2023*. *City of Lake Charles* received a total of *1* comment during both the 30-calendar-days comment periods.

Residents attended the public meetings for the CDBG-DR Action Plan which were held on the following dates:

- November 15, 2022 at 2 pm at the Allen P. August Multipurpose Center located at 2000 Moeling Street, Lake Charles, LA.
- November 15, 2022 at 6 pm at City Hall in the Council Chambers at 326 Pujo Street, Lake Charles, LA.
- March 16, 2023 at 2 pm at City Hall in the Council Chambers at 326 Pujo Street, Lake Charles, LA.

One comment form (image below bullet points) was returned by meeting participant Debra Ramsey which stated:

- PowerPoint should be bigger
- Money given but not being put in our area—North Lake Charles and Central East
- Need elevation in all areas because of flood waters
- Should be timeline transparency meeting to respond on programs

No comments were submitted via email or phone to the Department of Community Development. The Action Plan was not updated as the only comment received from the public did not require updating the draft. The City's Contracted Consultant Firm addressed the comment form during the public meeting in November 2022.



CDBG-DR Action Plan
Public Meeting
Comment Form

Name (Optional): Debra Ramsey
Address (Optional): 1313 4th Ave.

Based on the information reviewed in the presentation and in the draft CDBG-DR Action Plan for the City of Lake Charles, what are your comments or suggestions?

- ① Power point should be bigger
- ② Money given but not being put in our area North Lake, Central East.
NEED elevation in all areas because of the flood waters.
Should be true lines transparency Meeting to respond on progress

Please turn in this form to the meeting facilitator; email to CommunityDevelopment@cityoflc.us; or mail to Office of Community Development, P.O. Box 900, Lake Charles, LA 70602.

5.4 Data Sources/Methodologies.

- *The Economic Impact of the May 17–21 Floods on the State of Louisiana*, a report commissioned by Louisiana Economic Development
- City of Lake Charles Occupational License Data (September 2021)
- City of Lake Charles Building Safety and Private Property Debris Removal (PDDR) Program data (October 2021).
- State of Louisiana Substantial Action Plan Amendment No. 1 for the 2020 and 2021 federal declarations.
- S. Census Bureau's American Community Survey database for 2021.
- HUD's Office of Policy Development and Research (PD&R) Comprehensive Housing Affordability Strategy (CHAS) data for 2015–2019
- City of Lake Charles 2020-2-24 Consolidated Plan, July 2021
- SBA's FFY 20 Business Disaster Loan database
- *Louisiana Economic Forecast, State and MSAs: 2022 and 2023*. Dr. Loren Scott, October 2021.
- HUD's Office of Policy Development and Research (PD&R) Comprehensive Housing Affordability Strategy (CHAS) data for 2015–2019

Owner Occupied Households:

- 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
- Severe:
 - Greater than \$28,800 of FEMA inspected real property damage

Renter Occupied Households:

- Minor-Low:
 - Less than \$1,000 of FEMA inspected personal property damage
- Minor-High:
 - \$1,000 to \$1,999 of FEMA inspected personal property damage
- Major-Low:
 - \$3,500 to \$4,999 of FEMA inspected personal property damage
- Major-High:
 - \$5,000 to \$8,999 of FEMA inspected personal property damage
- Severe:
 - Greater than \$9,000 of FEMA inspected personal property damage

Important Definitions and Terms.

ADA: Americans With Disabilities Act

AMI: Area Median Income

BOSCOC: (Louisiana) Balance of State Continuum of Care

CBDO: Community-Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant–Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Citizen Participation

DBRA: Davis-Bacon and Related Acts

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting (System)

EIDL: Economic Injury Disaster Loan

FEMA: Federal Emergency Management Agency

FIPS: Federal Information Processing Standards

FIRM: Flood Insurance Rate Maps

GOHSEP: Governor's Office of Homeland Security and Emergency Preparedness

HAMFI: HUD Area Median Family Income

HCD Act: Housing and Community Development Act of 1974, as amended

HCV: Housing Choice Voucher

HMGP: (FEMA) Hazard Mitigation Grant Program

HUD: U.S. Department of Housing and Urban Development

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credits

LMC: Low-to-moderate income limited clientele

LMA: Low-to-moderate (income) area

LMI: Low-to-moderate-income

MID: Most impacted and distressed

MPH: Miles per hour

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

PDDR: Private Property Debris Removal

QPR: Quarterly Performance Reports

RAD: Rental Assistance Demonstration

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

TVL: Total verified losses

UGLG: Unit of general local government

URA: Uniform Relocation Act

5.6 Standard Form 424

Applicant and Recipient Assurances and Certifications

U.S. Department of Housing and Urban Development

CMB Number: 2501-0017
Expiration Date: 01/31/2026

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix:

*First Name:

Nicholas

Middle Name:

E.

*Last Name:

Hunter

Suffix:

*Title:

Mayor

*Applicant Organization:

City of Lake Charles

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance, except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion sex (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing, except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification, and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 48 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

8. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, I certify that I shall require all subgrantees at all tiers (including sub-grantees and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally recognized Indian Tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian Tribes and TDHEs established under State law are not excluded from the statute's coverage.

| Application for Federal Assistance SF-424 | |
|---|---|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | |
| * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | |
| * If Revision, select appropriate letter(s): _____ * Other (Specify): _____ | |
| * 3. Date Received: _____ | 4. Applicant Identifier: 72-6000641 |
| 5a. Federal Entity Identifier: _____ | 5b. Federal Award Identifier: _____ |
| State Use Only: | |
| 6. Date Received by State: _____ | 7. State Application Identifier: _____ |
| 8. APPLICANT INFORMATION: | |
| * a. Legal Name: City of Lake Charles | |
| * b. Employer/Taxpayer Identification Number (EIN/TIN): 72-6000641 | * c. UEI: S5VTGJRGSPU9 |
| d. Address: | |
| * Street1: 326 Pujo Street | |
| Street2: _____ | |
| * City: Lake Charles | |
| County/Parish: Calcasieu | |
| * State: LA: Louisiana | |
| Province: _____ | |
| * Country: USA: UNITED STATES | |
| * Zip / Postal Code: 70601-4269 | |
| e. Organizational Unit: | |
| Department Name: Community Development | Division Name: _____ |
| f. Name and contact information of person to be contacted on matters involving this application: | |
| Prefix: Mr. | * First Name: Mark |
| Middle Name: _____ | |
| * Last Name: Tizano | |
| Suffix: _____ | |
| Title: Director | |
| Organizational Affiliation: _____ | |
| * Telephone Number: 337-491-1440 | Fax Number: 337-491-1437 |
| * Email: mark.tizano@cityoflc.us | |

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

*** 12. Funding Opportunity Number:**

* Title:

CDBG-DR Funding

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

CDBG-DR Funding

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

| | |
|---------------------|--|
| * a. Federal | <input type="text" value="17,818,000.00"/> |
| * b. Applicant | <input type="text"/> |
| * c. State | <input type="text"/> |
| * d. Local | <input type="text"/> |
| * e. Other | <input type="text"/> |
| * f. Program Income | <input type="text"/> |
| * g. TOTAL | <input type="text" value="17,818,000.00"/> |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §§3729, 3802).

*Signature:

A yellow rectangular box containing a handwritten signature in black ink.

*Date:

A yellow rectangular box containing the date "4/27/2023" in black text.

Standard Form 424

Completed and inserted by the City on 4/27/23 for submission to HUD.
