



November 27, 2019

A Shared Initiative
AIA New Orleans
Alembic Community Development
Alliance for Affordable Energy
Bike Easy
Blueprint Investment Fund
Capital One Bank
Celestin Development Corporation
Center for Planning Excellence
(CPEX)
Delaney & Delaney, LLP
Desire Community Housing Corp
Downtown Development District
Enterprise Community Partners
Family Resources of New Orleans
Greater New Orleans Fair Housing
Action Center
Hancock Whitney Bank
Home By Hand
Iris Development Company
Jane Place Neighborhood
Sustainability Initiative
Jefferson Community Action
Programs (JeffCAP)
Jericho Road Episcopal Housing
Initiative
Louisiana Appleseed
Louvís Services
Lower 9th Ward Homeowners
Association
Lowermine.org
Metairie Bank
Neighborhood Development
Foundation
New Orleans Redevelopment
Authority
NewCorp, Inc.
PCA Development, LLC
Perez, A Professional Corporation
PosiGen
Preservation Resource Center
Providence Community Housing
Renaissance Neighborhood
Development Corporation
REO, LLC
SBP, Inc.
The Albert & Tina Small Center for
Collaborative Design
The Finance Authority of New
Orleans (FANO)
The Power Coalition for Equity and
Justice
The Urban Conservancy
Tulane/Canal Neighborhood
Development Corporation (T/CNDC)
Ulrich Consulting
University of New Orleans
Department of Planning and Urban
Studies (UNO-PLUS)
Urban Focus
Webre Consulting, LLC
Wells Fargo Advisors
Youth Rebuilding New Orleans

Office of Community Development - Disaster Recovery Unit
P.O. Box 94095
Baton Rouge, LA 70804-9095
Attn: Ms. Janice Lovett

Subject: Action Plan Comments
CDBG Action Plan for Watershed Initiative Funding Allocation (FR-6109-N-02)

Dear Ms. Lovett,

The Greater New Orleans Housing Alliance (GNOHA) is a collaborative of non-profit housing builders and community development corporations working to rebuild the housing stock available in the city of New Orleans after Hurricane Katrina devastated the city's infrastructure. Since its creation in 2007, GNOHA has sought to create change in the Greater New Orleans community through public policy, advocacy, and public education. The alliance advocates for the preservation and production of affordable housing for people within the Greater New Orleans metropolitan region and places a special emphasis on the needs of the most vulnerable in society – seniors, people with disabilities, veterans, low wage workers, and low-income families.

Funding allocation that addresses the challenges of disparate impacts to marginalized communities by acknowledging historic inequalities are essential to preventing the duplication of uneven and discriminatory recovery processes as implemented in the GNO region during wake of Hurricane Katrina. To ensure the prevention of disparate impact during recovery processes, GNOHA suggests requiring a comprehensive analysis to model and predict the various disparate impacts that could be induced by the suite of policy recommendations produced within the watershed initiative.

Unequal recovery from Hurricane Katrina and historical neglect have led to disinvestment and lack of protective services in various parts of the region. It is imperative that watershed management projects work in the best interest of our most at risk citizens to undo historic and existing patterns of social and economic discrimination. To this point GNOHA recommends, all watershed and project analyses include an analysis of disparate impacts across GNO communities, and all projects should be designed around specific mandates to avoid further discrimination, helping to repair existing discriminatory patterns.

After the historic flooding events of Hurricane Katrina the city of New Orleans learned civil legal aid is an essential and overlooked solution to helping survivors recover. Generational property, or property that is passed down from one family member to the next, is common in New Orleans. However, being unable to present a clear title prevents those who received

their property informally, without legal process, from the necessary funds for recovery. This is why GNOHA finds it necessary that funding and processes for title clearing are a part of a front-end program administered and funded by the state.

Community-based partners are critical to developing strategies and recommendations of more equitable and inclusive outcomes that enable a broader resident base to participate in the decision making process by bringing in local knowledge and expertise to solve complex and technical challenges. By investing in community-based organizations, we have a chance to ensure some of the most vulnerable communities in the GNO region are able to participate in decision-making processes that will ultimately affect their future. GNOHA recommends that 1% of the total CDBG DR funds included in this award are set aside for pass through funding to local nonprofit organizations to build up local capacity for disaster mitigation, recovery, and other measures to address the impacts of severe flooding.

This investment will provide public knowledge of how Louisiana's environmental challenges relate to our socio-economic challenges. Investing in nonprofit community leaders provides an opportunity to share resources, experience and knowledge in ways that can grow a comprehensive network of individuals and organizations who recognize this challenge in their work and are prepared to be champions for this challenge. The aforementioned results are all critical in developing equitable solutions that are representative of community needs in Louisiana.

Thank you for your consideration, and please feel free to contact me at 504.224.8301 or amorris@gnoha.org with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Andreanecia M. Morris". The signature is fluid and cursive, with a large initial 'A'.

Andreanecia M. Morris,
President