



November 27, 2019

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

- 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
- Louis 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

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](mailto:amorris@gnoha.org) with any questions.

Sincerely,



Andreanecia M. Morris,  
President