

The City of Slidell

Ben O. Morris
MAYOR



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October 26, 2005

Mr. Scott Wells
Deputy Federal Coordinating Officer
DR-1603 Louisiana
415 N. 15th Street
Baton Rouge, LA 70801

Col. Jeff Smith
Louisiana Office of Emergency Preparedness
7667 Independence Blvd.
Baton Rouge, LA 70806-6404

Re: Post-Katrina Rebuild of Slidell, Louisiana

Gentlemen:

The City of Slidell is viewing the post-Katrina aftermath as an excellent opportunity to share in President Bush's vision that "we'll not just rebuild, we'll rebuild higher and better". Slidell desires to partner with the Federal government and the State of Louisiana so that we can rebuild in a sensible, well-planned way and so that we will be better and stronger than before the storm. It is with these precepts in mind that this letter is written. Our intent is to express concerns, ask questions and suggest recommendations at the outset of Slidell's rebuilding process in order to achieve our goals as efficiently as possible. We request written responses from FEMA as soon as possible. I and relevant members of my staff are ready to meet with each of you and your respective staff members should the need arise or to answer any questions you may have.

Concerns/Questions Relating To Future Hazard Mitigation Grant Program(s)

1. In connection with future Hazard Mitigation Grant Program(s) (HMGP), will costs of administering the program(s) be paid for with grant funds? The City of Slidell lacks the staff to administer any HMGP and therefore would likely hire a contractor to perform the administrative tasks. We want to be certain that grant program funds would pay for administrative services either on a direct pay or reimbursement basis.

2. Past HMGP have been comprised of a federal share and a non-federal share of funds. Typically that ratio has been 75% federal and 25% non-federal. Will that same ratio apply to future HMGP?

3. Can ICC (Increased Costs of Compliance) monies be applied by eligible homeowners as part or all of their non-federal share? Can flood insurance claim proceeds be used by eligible homeowners as part/all of their non-federal share? Can SBA mitigation loan proceeds be used by eligible homeowners as part/all of their non-federal share?

4. In the past the City of Slidell took part in an HMGP which used a "second story conversion" technique to effect elevation of some participating homes. In future HMGP, can Slidell limit the alternatives to either physical elevation of existing structures (including the elevation of substantially damaged buildings, providing they are structurally sound) or acquisition by Slidell? If so, and in connection with physical elevation, can a single contractor be employed? Economies of scale can thus be better realized.

5. In addition to the two alternatives stated above, i.e. physical elevation or acquisition, will any future HMGP allow demolition of participating homes and rebuilding a code-compliant structure on the same building footprint (demo/rebuild)? In other words, can some of the ICC program rules be used in HMGP situations? Can demo/rebuild be considered "construction activities that will result in protection from hazards" under 44 CFR 206.434(d)(2)(iv)?

6. Can the cost/benefit analysis be waived for HMGP funding eligibility? Can those owners whose property has been declared substantially damaged be automatically eligible for HMGP funding? Can an entire HMGP project as a whole be subjected to a cost/benefit analysis rather than individual homes? Some homes may not pass the analysis individually but the project as a whole could pass.

7. When will funding be available for post-Katrina HMGP? Can that availability be expedited?

Recommendations:

1. Include HMGP administrative costs in the program itself and payable directly to the contractor.
2. Increase the federal/non-federal share from 75/25 to at least 90/10 or, preferably, 100/0.
3. Allow demo/rebuild under HMGP.
4. Allow a single contractor to perform all physical elevations.
5. Allow use of ICC, SBA and flood insurance proceeds towards the non-federal share, if any.

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6. Waive cost/benefit analysis for substantially damaged structures and make them automatically eligible for HMGP funding for either acquisition or elevation.

7. Make an entire HMGP project the subject of cost/benefit analysis rather than individual homes.

I thank you for the opportunity to present these issues for consideration and await your prompt reply.

Sincerely yours,

Ben O. Morris
Mayor

BOM/jkf

cc: The Honorable David Vitter, U. S. Senator
The Honorable Mary Landrieu, U. S. Senator
The Honorable Bobby Jindal, U. S. Representative
The Honorable Walter J. Boasso, State Senator
The Honorable A. G. Crowe, State Representative
The Honorable Pete Schneider, State Representative