HURRICANE KATRINA: HOW WILL MISSISSIPPI TURN THE CORNER?

AN INTERIM REPORT ON HOUSING RECOVERY



July, 2010

The first in a series of reports by the Mississippi Center for Justice on Mississippi's efforts to rebuild and restore itself following Hurricane Katrina. This report, together with other work, will be compiled into an expanded Fifth Anniversary report prepared for and released by the Steps Coalition in late August, 2010.

Find more on Mississippi Center for Justice at <u>www.mscenterforjustice.org</u> and on the Steps Coalition at <u>www.stepscoalition.org</u> .



ALMOST FIVE YEARS have passed since Mississippi proclaimed its intention to "Build Back Better Than Before" from the devastation of Hurricane Katrina using nearly \$5.5 billion in federal Community Development Block Grant (CDBG) funds. Once the U.S. Department of Housing and Urban Development (HUD) allocated these funds, Mississippi requested that HUD remove requirements to prioritize aid to those least able to finance their own recovery.¹ As an increasingly reluctant HUD Secretary granted waivers that ultimately covered \$4 billion,² Mississippi set itself upon a course of spending less, later and more slowly on the permanent housing recovery of lower-income residents than on wealthier residents and businesses.³ By the summer of 2008, Gulf Coast business leaders saw that the affordable housing recovery was off course and urged Governor Barbour to better focus his efforts.⁴ In response, the Governor appointed Biloxian Gerald Blessey as Gulf Coast Housing Director, whose efforts have improved the State's performance. Even so, nearly two years later, as we approach the five year anniversary, Mississippi has missed its mid-2010 targets by 2,500 units and must complete over 5,200 units to reach its mid 2011 goals. Mississippi's underperformance and the current pressure to redirect unused federal hurricane resources to more recent disasters put at risk the hopes of low-income Mississippians to return to a permanent home.⁵

RIGHT NOW, well over 5,000 thousand Mississippi households lack permanent affordable housing, due to unjust decisions by Mississippi policymakers, irrational interpretation of federal audit, elevation, and environmental rules, and discriminatory zoning decisions by local governments. If Mississippi is to keep its promise to build back better than before, federal, state, and local officials must immediately:

- Redirect and restore enough housing funds to cover the cost of the remaining unmet needs population using a combination of CDBG and non-Stafford Actencumbered resources to close the recovery gaps
- Eliminate discriminatory zoning treatment of cottages, and require local governments to recognize state-law classification of Mississippi cottages as modular homes
- Accelerate and augment remaining small rental, long-term workforce, cottage and public housing programs

I. LEFT OUT

WAITING ON A BAKE SALE

As the Gulf Coast prepares for the fifth anniversary of Hurricane Katrina, Mississippi officials, business, and media boast that the state's disaster housing response is an example for the nation to emulate.⁶ Leaders will cite the decommissioning of 38,000 FEMA trailers and statistics on the state's housing programs. But neither the removal of the last FEMA trailer nor the current performance of affordable housing efforts will signal a successful end by this summer. Today, more than 4,000 South Mississippi households in state-sponsored case management systems have not obtained resources to meet their housing needs.⁷

At present, over 100 of these displaced Mississippi households unable to return to a permanent home are advertised on an "Adopt a Katrina Family" website that

encourages private financial sponsorship and charitable fundraising from bake sales, car washes and lemonade stands.⁸ As well-meaning as this online appeal may be, Mississippi cannot be permitted to place further demands upon private charity to house our citizens when the state diverted vast housing resources to other uses that still remain unspent. Mississippi should restore as much as necessary of the nearly \$800 million in housing assistance that it diverted to business

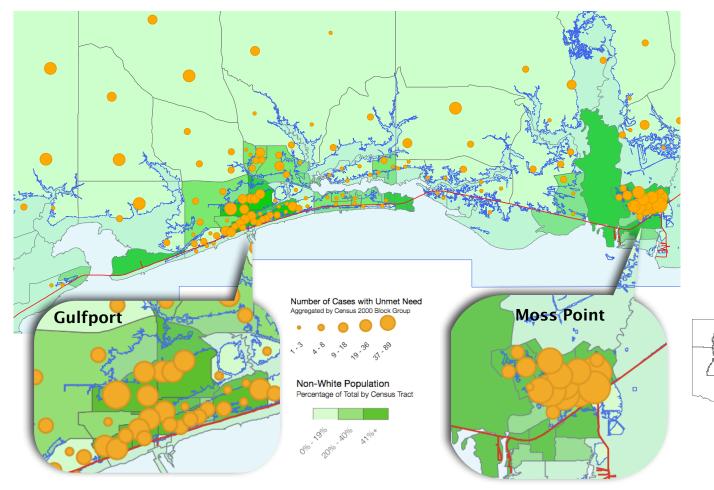


development⁹ to finish housing these and all other good and deserving south Mississippi residents first.

Current funds available to non-profit agencies managing cases of unmet needs, including the Coming Home collaborative and the Home Sweet Home program, do not begin to cover the full need of these populations, let alone those in files closed for no resources or those living outside the housing disaster recovery systems.

CLUSTERS OF UNMET NEED

Flaws in Mississippi's homeowner grant program explain why some south Mississippi households continue to need assistance to rebuild or repair their homes. First, grants were denied to 7,300 coastal Mississippi residences with major to severe wind damage, of which about 2,100 could not afford or did not obtain hazard insurance.¹⁰ Second, Mississippi's homeowner grant programs did not cover the household's needs, whether due to eligibility, duplication of benefits, or calculation of the loss. The effects of these flaws fall heavily on lower-income residents all across southern Mississippi, but the concentration of wind-damaged households is unmistakable in African American neighborhoods immediately north of the railroad tracks in Gulfport and Moss Point.¹¹ Meeting these needs will reverse the trend of disinvestment and blight and make the recovery more equitable.



Map: Wind-damaged households and Non-White Population

Source: GCCDS Maps derived from HRC data. See Appendix, Figure 2 for full map.

The injustice of excluding wind-damaged households is shown by the story of the Chamberlains. When Katrina's tidal surge swept in, the Chamberlains waded out

of their Gulfport home and escaped across the CSX railbed into predominantly African American Soria City, where a woman offered them shelter in her home until the storm blew over. The Chamberlains received a homeowner's grant, but the woman who sheltered them, and who herself had extensive wind damage, was excluded from public disaster grant assistance to repair or rebuild her own home.¹²



CLOSED CASES AND THE INVISIBLES

Besides the more than 4,000 households currently being case managed, the stories of another 1,000 or more families whose needs were denied by state programs are housed in closed files in boxes and archived computer records of various resource agencies. In this group are the families whose heads of households merely acquiesced when told no help was available, or who were too weary or burdened to press further. The human beings behind these numbers and computer files remain embedded in coastal Mississippi's cycle of poverty.

And there are still others who do not show up in these closed files, the "Invisibles." A recent community survey of households with unrepaired damage found that 70 out of 84 households in North Gulfport had never had case management – they were outside the system.¹³ An example is Syleaner McLaurin, whose home in Gulfport's Rolling Meadows community had the south side of the roof come off from Hurricane Katrina's winds but who was rejected twice for state housing grant assistance. Today, the home she shares with her daughter and her family leaks in five rooms when it rains due to incomplete repairs. Ms. McLaurin is not a current or former housing resource center client. Asked how hard it has been, she replied, "I feel left out and alone."¹⁴

RENTERS

Extremely low-income renters remain without affordable housing choices in communities where public housing authorities have failed to rebuild public housing, particularly in smaller communities such as Long Beach, Waveland, and Bay St. Louis. In addition, renters who must depend upon Section 8 vouchers continue to find difficulty in locating affordable housing in areas within reasonable distance to work, schools and hospitals. Ms. Morel was a former homeowner in Waveland, Mississippi, who was transformed into a renter by Katrina. She currently is awaiting the construction of public housing scheduled for completion on the fifth anniversary of Katrina. In the meantime, however, she has received repeated notices threatening her with eviction from her MEMA cottage.

SUMMARY

All told, well over 5,000 households continue to have unmet disaster housing needs of one type or another, using conservative estimates. A significant portion of these families want their existing home repaired – they do not want a voucher, a cottage, or a new mortgage. For others, a cottage, a voucher, or down payment assistance may be a welcome fresh start, but Mississippi must do more to overcome the barriers to access these programs. The State's duty is to fit the remaining housing assistance to the actual needs of the people, instead of forcing them to accept the wrong solution. By now, Mississippi has done nearly all the easy housing recovery work. Housing advocates remain concerned that Mississippi will eliminate the remaining cases through attrition, instead of rising to the challenge.

Some leaders scold those who have been unable to return to permanent housing, presuming that the state's housing assistance has been too accommodating. For example a local editorial recently declared Mississippi's housing program a "spectacular success" because 98 percent of the FEMA trailers have been removed, and chided those still in need to show some initiative.¹⁵ However, Mississippi's housing programs have not been a spectacular success for the "Adopt–a–Katrina Family" list or the backlog of case–managed, closed, and invisible households. The State has extended no assistance to some, and far too little to others – and the fault lies with government rules and policies that block or stymie their paths to recovery, not with the residents whose recovery these funds were intended to support.

II. BELOW PAR

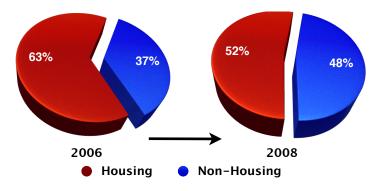
Today, Mississippi boasts that three-fourths of its \$5.48 billion in disaster aid, or almost \$4 billion, is for housing, a bald exaggeration. A GAO report to Congress refused to count as "indirect housing" over \$1.1 billion in rate subsidies and infrastructure that benefitted businesses as much as residents.¹⁶ Between 2006 and 2008, Mississippi reduced its direct housing allocation by almost \$800 million, or from 63 to 52 percent, according to a 2009 General Accounting Office report.¹⁷ Since 2008, there has been no substantial reallocation of funds back into affordable housing.

Mississippi's rate of spending of Katrina CDBG funds is lower than Louisiana's, a performance that remains difficult for Mississippi to justify, given that Louisiana was under-funded initially, and had to return three times to Congress to get its current allocation. Even with its higher rate of spending, Louisiana is under pressure from Congress to reprogram Road Home funds to more recent

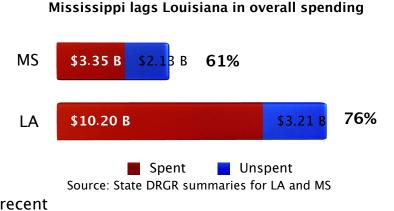
Mississippi boasts over 70 percent spent on housing,



but GAO finds Mississippi <u>reduced</u> housing spending between 2006 and 2008.



Source: GAO-09-541 Gulf Coast CDBG Disaster Assistance, p 10.



disaster needs. Mississippi may also face this risk unless it increases its rate of spending.

What has been the State's overall performance over the period since Gulf Coast leaders urged Governor Barbour to take stronger action on affordable housing? The trend of the quarterly rate of spending on all programs after the third anniversary of Katrina remained stuck in a 2 to 3 percent range (\$125 to \$280 million), well below the \$980 million peak in Q4 2006 . See Figure 1.

Although the State started at the same time on both, its spending on economic development programs has increased quarter over quarter, in contrast to its latest affordable housing programs.¹⁸ Spending on economic development has outpaced affordable housing for almost every quarter in this period. See Figure 2.¹⁹

Over the past 21 months, cumulative spending on the Small Rental Assistance Program and Long-Term Workforce Housing has accelerated, a positive development. Spending has lagged in the Public Housing program, a negative performance, considering that funding has been available for spending on public housing since 2006. See Figure 3.

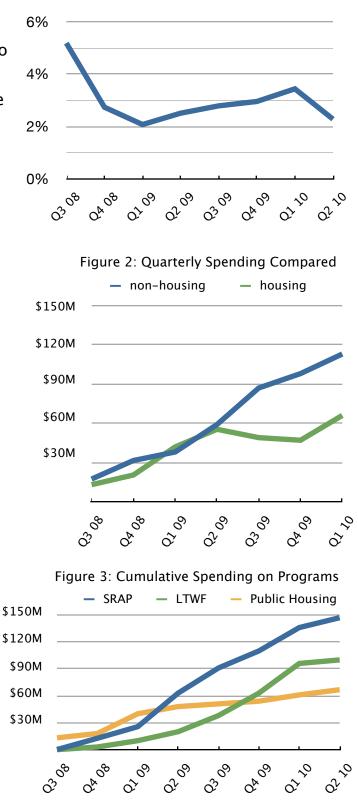
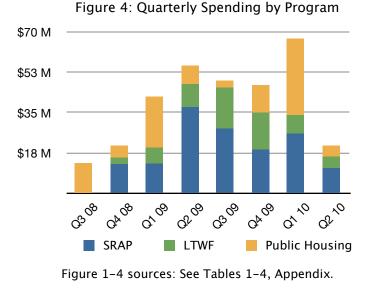


Figure 1: Quarterly Rate of Total Spending

On a quarter by quarter basis, the rate of spending appears to have peaked. This is troubling because, as discussed in the next section, several affordable housing programs have so far failed to deliver on promises of significant affordable housing supply and must substantially increase performance over the next twelve months to achieve their targets. See Figure 4.²⁰

SUMMARY



Mississippi still has approximately \$2 billion of unspent emergency Katrina block grant funds, which will take the state years to use. The problem is priorities, not funding. Over the past 18 months, the state has improved its rate of spending on the remaining affordable housing programs, but the progress has been uneven when compared to spending on non-housing activities. As described in the next section, a dramatically increased rate of spending will be required for Mississippi to reach its own affordable housing targets for 2011. In addition, these programs standing alone will not solve the repair needs of thousands of lower-income Mississippians with hurricane wind damage. Therefore, Mississippi must consider restoring as much of the emergency disaster aid as is required to solve these Mississippians' housing problems.

III. DON'T COUNT ON IT

MISSISSIPPI OVERSTATED ITS AFFORDABLE HOUSING FORECAST BY 15,000

After the 2007 announcement that Mississippi would divert \$600 million in housing funds to the State Port at Gulfport, public pressure increased for the State to explain how much damage Mississippi's housing had experienced and how much housing would be rebuilt under the existing disaster programs.²¹ Before this could be resolved, Mississippi diverted another \$200 million in housing funds to Hancock County economic development and community revitalization.²² In May 2008, Rep.

Maxine Waters chaired an <u>oversight hearing</u> on disaster CDBG spending in the House Financial Services Subcommittee on Housing. At that hearing, Jack Norris, for the Mississippi Development Authority (MDA), justified the diversion of housing funds on



the basis that existing housing programs would produce more housing than the coast had before Katrina. He also announced that the State was commissioning a study of housing damage and recovery.²³ See Appendix, Table 5 for details. The study, known as the Mississippi Housing Data Project (MHDP), was carried out jointly

by the Compass Group, a Washington, D.C.based research organization, and South Mississippi Planning and Development District. The MHDP used state agency data on supplies from the disaster housing programs. The product consists of three reports in



December 2009 Update Mississippi Gulf Coast

By The Compass Group, LLC and Southern Mississippi Planning and Development District

January, June and December 2009.²⁴ The analysis set forth in Table 1 draws from the <u>December 2009, report</u> that includes a set of forecasts for how many units will be available in the lower six counties as of mid-2011.

The MDA's 2008 forecasts to Congress for the affordable housing categories shown in Table 1 are more than double those of the MHDP. In other words, Mississippi overstated to Congress by over 15,700, or a factor of 2 how many housing units would be produced in aggregate by the programs listed in Table 1. This exaggeration would increase if one includes 4,500 units from a 2008 proposed housing resource fund that was abandoned by the State.

			•	
	MDA 2008	MHDP	MHDP-MDA	%
small rental	7,500	4,181	-3,319	179%
LTWF housing	12,850	2,041	-10,809	630%
LIHTC*	5,283	3,775	-1,508	140%

Table 1 : State Inflated Affordable Housing Production

	MDA 2008	MHDP	MHDP-MDA	%
public housing	3,200	3,077	-123	104%
total	28,833	13,074	-15,759	221%

Source: Norris testimony, p. 3; MHDP December 2009, pp. 5, 11, 20, 49. *Note: MHDP's total of 5,059 LIHTC has been reduced by 1,284 units to eliminate double counting of public housing units partially financed by LIHTC. See Appendix, Table 6.

MISSISSIPPI MISSES ITS 2010 AFFORDABLE HOUSING GOALS BY 2,500

Despite increased spending during the past 18 months and diligent leadership from the Gulf Coast Housing Director, three of the state's key affordable housing programs are currently more than 2,500 housing units below what MDHP forecast only six months ago, as shown in Table 2. Notably, the MHDP was only forecasting six months out based upon data about projects already complete and in process, unlike the State's 2008 predictions, so this shortfall is less excusable by the uncertainty of prediction. The areas of sharpest underperformance are actual permanent Mississippi Cottages are **1,692 below** forecast and small rental units at mid–2010 are **798 below** forecast.

	2010 forecast	2010 actual	actual-forecast	%
small rental	3,271	2,473	-798	76%
LTWF housing	227	163	-64	72%
MS Cottage	2,242	550	-1,692	25%
total	5,740	3,186	-2,554	56%

Table 2 : State Misses Mid 2010 Forecast by over 2,500 Units (56% of forecast)

Sources: MHDP December 2009, pp. 5, 11, 20, 49; MDA updates on small rental, workforce housing, and Mississippi cottage programs.

To close this gap, the State's programs must produce over 5,200 more units in the next 12 months, which would be far higher than what the same programs produced in the past 21 months.

	MHDP	2010 actual	actual-forecast
small rental	4,181	2,473	-1,708
LTWF housing	2,041	163	-1,878
MS Cottage	2,242	550	-1,692
total	8,464	3,186	-5,278

Table 3 : State Must Complete Over 5,200 units by Mid-2011

Sources: MHDP December 2009, pp. 5, 11, 20, 49; MDA updates on small rental, workforce housing, and Mississippi cottage programs.

Over the upcoming 12 months, the challenges are:

- Construction of 1,878 units of long term workforce housing
- Construction of 1,708 units of small rental housing
- Permanent placement of 1,692 Mississippi Cottages

These challenges are daunting. It will require increased determination and cooperation between federal, state and local officials to complete over 5,200 housing units in the next 12 months. Most of all, however, these programs are not currently solving the needs of thousands of unserved, invisible, and increasingly desperate residents who want to build back their own homes where they live. These citizens deserve better treatment than they currently have received. Therefore, before Mississippi can declare its housing recovery mission to be accomplished, it must confront and fix the systematic injustices in the existing housing programs.

SUMMARY

Nearly two years after Gulf Coast leaders urged Governor Barbour to refocus his affordable housing recovery efforts, Mississippi remains over 5,200 units short of its forecast for completion by 2011. If recent performance is a fair guide, this goal will not be met unless the State dramatically alters course. In broad terms, two things must happen – and one is not a substitute for the other. First, Mississippi must tackle and fund the needs in the backlog of unfinished business in its case management systems, its closed files, and its residents who have fallen out of the system. Second, the State needs to significantly ramp up the performance of its affordable housing programs over the next 12 months.

IV. RECOMMENDATIONS

For Mississippi and Federal officials:

- Redirect and restore enough housing funds to cover the cost of the remaining unmet needs population using an appropriate combination of redirected Katrina CDBG and non-Stafford Act-encumbered resources to close the recovery gaps;
- Eliminate discriminatory zoning treatment of cottages and require local governments to recognize state-law classification of Mississippi cottages as modular; and
- Find solutions to elevation disputes, duplication of benefits²⁵ problems and individual environmental permitting, including the use of batch environmental permits for repair or rehabilitation of existing structures.

For Mississippi officials:

- Increase the output of small rental and long-term workforce housing programs to meet the 2011 program targets.
- Accelerate the permanent placement of Mississippi cottages, and provide the necessary funding to enable the remaining applicants to achieve this goal, including reliable elevation grant funding.

For local officials:

- Repeal discriminatory ordinances that improperly classify Mississippi cottages as manufactured housing.
- Use formula CDBG in combination with Katrina CDBG to fund remaining housing projects so as to reduce barriers due to the Stafford Act.

In a report to be released later this summer, Mississippi Center for Justice will analyze Hancock County, where the permanent housing recovery has stubbornly and significantly lagged the population recovery.²⁶

V. APPENDIX

Table 1: Data for Figure 1 - Quarterly Total Spending

	cumulative spending	per quarter	percent of total
Q3 2006	\$38,737,000.00	38,737,000	0.7%
Q4 2006	\$979,907,835.00	\$941,170,835	17.2%
Q1 2007	\$1,317,452,000.00	\$337,544,165	6.2%
Q2 2007	\$1,472,717,029.00	\$155,265,029	2.8%
Q3 2007	\$1,644,047,171.00	\$171,330,142	3.1%
Q4 2007	\$1,830,882,370.00	\$186,835,199	3.4%
Q1 2008	\$2,013,965,344.00	\$183,082,974	3.3%
Q2 2008	\$2,170,392,384.00	\$156,427,040	2.9%
Q3 08	\$2,453,993,777.00	\$283,601,393	5.2%
Q4 08	\$2,603,629,543.00	\$149,635,766	2.7%
Q1 09	\$2,717,015,704.00	\$113,386,161	2.1%
Q2 09	\$2,854,149,312.00	\$137,133,608	2.5%
Q3 09	\$3,006,619,869.00	\$152,470,557	2.8%
Q4 09	\$3,168,192,335.00	\$161,572,466	2.9%
Q1 10	\$3,356,199,500.00	\$188,007,165	3.4%
Q2 10	\$3,480,824,192.00	\$124,624,692	2.3%
unspent		\$2,000,175,808	36.5%
total	\$5,481,000,000.00		

Source: Mississippi Disaster Recovery Grant Report (DRGR) data 2006–2010, estimates used for Q2 2010 based on MDA spending updates. <u>http://www.msdisasterrecovery.com/index.php?</u> option=com_content&view=article&id=53<emid=53&lang=us

Table 2: Data	for Figure	2-Ouarterly	/ Spendina	Compared

	non-housing	housing
Q3 08	\$17,300,000	\$13,000,000
Q4 08	\$31,500,000	\$20,400,000
Q1 09	\$38,000,000	\$41,900,000
Q2 09	\$59,000,000	\$55,400,000

	non-housing	housing
Q3 09	\$87,000,000	\$49,000,000
Q4 09	\$98,000,000	\$47,000,000
Q1 10	\$113,000,000	\$66,000,000

Source: Calculations based upon Mississippi Disaster Recovery Grant Report (DRGR) data 2006–2010. http://www.msdisasterrecovery.com/index.php?

<u>option=com_content&view=article&id=53<emid=53&lang=us</u>. "Non-housing" category includes economic development, community revitalization, and infrastructure programs.

	SRAP	LTWF	Public Housing
Q3 08	\$89,000	\$0	\$13,200,000
Q4 08	\$12,700,000	\$3,000,000	\$18,000,000
Q1 09	\$25,600,000	\$10,000,000	\$40,000,000
Q2 09	\$63,000,000	\$20,000,000	\$48,000,000
Q3 09	\$91,000,000	\$38,000,000	\$51,000,000
Q4 09	\$110,000,000	\$63,000,000	\$54,000,000
Q1 10	\$136,000,000	\$96,000,000	\$61,000,000
Q2 10	\$147,000,000	\$100,000,000	\$66,800,000

Table 3: Data for Figure 3 -Cumulative Spending By Program

Source: Calculations based upon Mississippi Disaster Recovery Grant Report (DRGR) data 2006–2010. http://www.msdisasterrecovery.com/index.php?

option=com_content&view=article&id=53<emid=53&lang=us. Numbers are rounded off and estimates used for Q2 2010 are based on MDA spending updates.

I	able 4: I	Data fo	r Figure 4	– Quarterly	Spending	By Program	

	SRAP	LTWF	Public Housing	Total
Q3 08	\$89,000	0	\$13,000,000	\$13,089,000
Q4 08	\$12,611,000	\$3,000,000	\$4,800,000	\$20,411,000
Q1 09	\$12,900,000	\$7,000,000	\$22,000,000	\$41,900,000
Q2 09	\$37,400,000	\$10,000,000	\$8,000,000	\$55,400,000
Q3 09	\$28,000,000	\$18,000,000	\$3,000,000	\$49,000,000
Q4 09	\$19,000,000	\$25,000,000	\$3,000,000	\$47,000,000
Q1 10	\$26,000,000	\$33,000,000	\$7,000,000	\$66,000,000
Q2 10	\$11,000,000	\$4,000,000	\$5,800,000	\$20,800,000

Source: Calculations based upon Mississippi Disaster Recovery Grant Report (DRGR) data 2006–2010. http://www.msdisasterrecovery.com/index.php?

option=com_content&view=article&id=53<emid=53&lang=us. Numbers are rounded off. Q2 2010 numbers are estimated based on MDA spending updates.

program	amount	low	high
program	amount	low	high
long term workforce housing	\$350 million	11,000	12,850
small rental assistance program	\$262 million	6,500	7,500
housing resource fund*	\$150 million	3,800	4,500
public housing	\$105 million	3,200	3,200
low income housing tax credit	\$62 million	5,283	5,283
USDA loans & grants	\$45 million	822	822
LIHTC backstop	\$30 million		
Mortgage Revenue Bonds	\$45 million	1,255	1,255
homeowner assistance	\$1.65 billion	18.958	24,577

Table 5: Mississippi Housing Program Forecasts 2008

Source: Testimony of Jack Norris, Office of Recovery and Renewal, May 20, 2008, House Financial Services Subcommittee on Housing and Community Opportunity Hearing, p. 3.

*The housing resource fund was a proposed program that was not implemented by Mississippi.

Table 6: List of Public Housing Projects Subtracted from MHDP's GO Zone LIHTC Completions in Table 1, "State Inflated Affordable Housing Performance"

Development	Location	Housing Authority	Total Units
Regency Way Apartments	Gulfport	Region 8	120
Camille Village Apartments	Pass Christian	Region 8	86
Highland Springs Apartments	Pascagoula	Region 8	96
Morrison Village Apartments	Pascagoula	Region 8	120

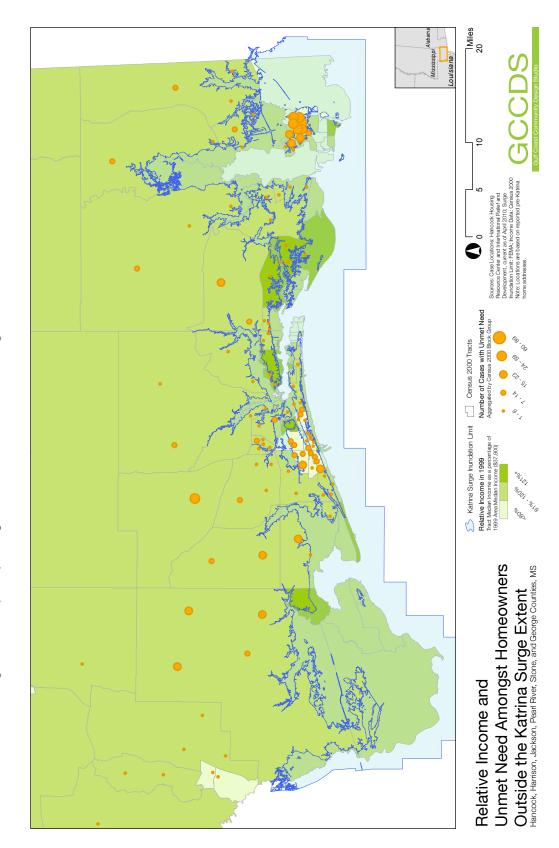
Development	Location	Housing Authority	Total Units
Taylor Heights Apartments	Pascagoula	Region 8	144
Crown Hill	Biloxi	Biloxi	99
Estates at Juan de Cuevas	D'Iberville	Region 8	128
Timber Grove Apartments	D'Iberville	Region 8	96
Bay Pines Apartments	Bay St. Louis	Bay Waveland	129
Oak Haven Apartments	Waveland	Bay Waveland	80
Village Place Apartments	Gulfport	Region 8	96
Long Beach Estates	Long Beach	Long Beach	90
Total Subtracted from MHDP GO Zone Completions			1284

Source: Mississippi Housing Data Project, December, 2010, pp. 5, 49.

Table 7: Homes with Major to Severe Wind Damage, Three Coastal Counties

	minor	major	severe
Hancock	2560	746	460
Harrison	18615	3804	621
Jackson	8482	1497	174
total major to severe			7302

Source: Current Housing Unit Damage Estimates, FEMA, HUD, February 2006, pp. 28-30.





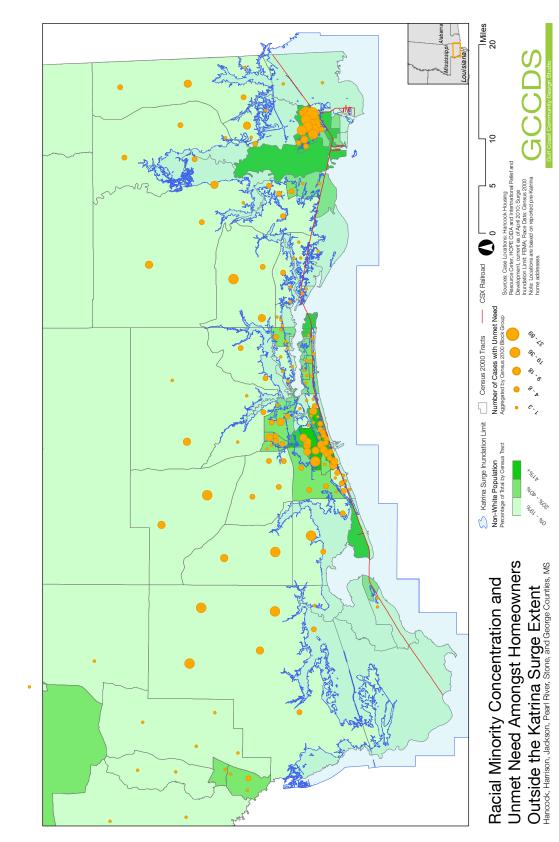


Figure 2: Map Depicting Unmet Needs Above Surge Extent and Racial Minority Concentrations

This report was prepared by Reilly Morse, co-director of housing advocacy at the Gulf Coast office of the Mississippi Center for Justice, with grateful acknowledgement for contributions from our staff and consultants and the Housing Section of the Lawyers' Committee for Civil Rights Under Law, Washington, D.C.

³ Mississippi's track record on spending less later and more slowly on lower income housing programs is detailed in "Hurricane Katrina: Has Mississippi Fallen Further Behind?" Steps Coalition, September 2009, pp. 4-6. http:// www.stepscoalition.org/downloads/news/headlines/k+4_report.pdf

⁴ See Recommendations of the Housing Working Group of the Gulf Coast Business Council, August 8, 2008. Copy on file with author.

⁵ Section 4170 of H.R. 4899, the supplemental war spending bill, contains recissions of funds from two Gulf Coast disaster recovery appropriations.

⁶ "We Need A Swift Successful End to a Spectacularly Successful Housing Program" Editorial, Sun Herald January 13, 2010.

⁷ Estimates provided by Housing Resource Centers to author.

⁸ See "Adopt A Katrina Family Project" Mississippi Case Management Consortium, <u>www.adoptakatrinafamily.org</u>. For fundraising via bake sales, car washes, and lemonade stands, see "Get Creative," <u>http://www.mc-mc.org/adoptafamily/component/content/article/8-get-creative-.html</u>

⁹ Mississippi's diversion of nearly \$800 million in housing funds is described in "Has Mississippi Fallen Further Behind," p. 3.

¹⁰ For wind-damage estimates, see Table 8, Appendix, data drawn from <u>"Current Housing Damage Estimates,</u> <u>Hurricanes Katrina, Rita, and Wilma,</u>" HUD, p. 12. Mississippi had no qualms over moral hazard when it awarded hundreds of millions of dollars in grants to electric utilities, local governments, or state-owned operations such as the State Port at Gulfport, to cover uninsured or underinsured losses. See Action Plans for Ratepayer Mitigation, Community Revitalization, and the State Port at Gulfport.

¹¹ See Appendix for maps showing Unmet Need by Income (Figure 1) and by Non-White Population (Figure 2).

¹² Interview with Chamberlain family, June 2010, on file with author.

¹³ Survey by North Gulfport Community Land Trust conducted in July, 2010; results on file with author.

¹⁴ Interview with Syleaner McLaurin, July, 2010, on file with author.

¹⁵ "We need a swift, successful ending to a spectacularly successful housing program," Sun Herald editorial, January 13, 2010, A 14.

¹ Mississippi's pattern of seeking waivers on disaster aid spending targets for lower-income persons is described in "Mississippi CDBG Recovery Fund Report Card and Recommendations," Steps Coalition, January, 2008, pp, 2-4. <u>http://www.stepscoalition.org/downloads/news/reports/2008ReportCard.1.pdf</u>

² Letter from HUD Secretary Alphonso Jackson to Governor Barbour, January 25, 2008. Secretary Jackson took the unusual step of personally writing Governor Barbour about the approval to explain that he had "little discretion" in the matter, and to voice concerns that "this expansion does indeed divert emergency federal funding from other, more pressing recovery needs, most notably affordable housing."

¹⁶ These included repairs to electric utility company buildings and equipment, expansion of sewage and water systems, and insurance premium buydowns. See ¹⁶ GAO-09-541 Gulf Coast CDBG Disaster Assistance, p. 10. See also Senator Landrieu's exhibit for "The Role of the Community Development Block Grant Program in Disaster Recovery," Hearing before Senate Homeland Security Subcommittee on Disaster Recovery, May 20, 2010, p. 145 (Mississippi's allocation of CDBG Funds."

¹⁷ GAO-09-541 Gulf Coast CDBG Disaster Assistance, p. 10.

¹⁸ Long Term Workforce Housing, Small Rental, Public Housing, and LIHTC gap financing.

¹⁹ Q2 2010 numbers are omitted here because of the absence of reliable data on the non-housing spending.

²⁰ Figure 4 uses partial estimates of spending for Q2 2010.

²¹ Editorial, Biloxi Sun Herald, "We Need Housing Numbers We Can Crunch With Confidence," December 19, 2007, p C-4.

²² MDA Hancock County Ground Zero Action Plan.

²³ Testimony of Jack Norris, House Financial Services Subcommittee on Housing and Community Opportunity hearing, May 20, 2008, pp. 3-6, <u>http://financialservices.house.gov/hearing110/norris - ms (complete).pdf</u> A table with these predictions appears the Appendix to this report.

²⁴ For the MHDP reports, see: http://smpdd.com/data-center/mississippi-housing-data-project.html

²⁵ "Duplication of benefits" refers to the requirement under the Stafford Act that a person not be paid twice for disaster assistance to solve the same housing need. Numerous controversies have arisen over whether the Stafford Act requires exclusion of various types of private resources, temporary benefits, and general disaster relief assistance, and whether to take into account reductions in assistance from forced payoffs or contractor fraud, among other things.

²⁶ See "Rebuilding Hancock County, Shortfalls in the Housing Recovery, Four Years After Katrina," Mississippi Center for Justice, to be released August 2010.

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