



TEXAS GENERAL LAND OFFICE  
GEORGE P. BUSH, COMMISSIONER

September 6, 2022

Charles Wemple, Executive Director  
Houston-Galveston Area Council  
PO Box 22777  
Houston, TX 77227

Re: Houston-Galveston Area Council (H-GAC) CDBG-MIT Regional Mitigation Program Method of Distribution (MOD) Approval

Mr. Wemple:

The Texas General Land Office (GLO) Community Development and Revitalization program (GLO-CDR) is approving the H-GAC Mitigation Method of Distribution (MOD). The MOD delivered to the GLO was initially submitted August 25, 2022, underwent review by GLO staff, and was submitted a final time with corrections made on August 31, 2022.

With this approval, entities receiving funding from the MOD will receive information regarding the application process from the GLO. If you have any questions or require additional information, please contact Alex Swift at [alex.swift.glo@recovery.texas.gov](mailto:alex.swift.glo@recovery.texas.gov).

Sincerely,

Alexandra Gamble, Policy Development Director  
Community Development and Revitalization

Cc: Heather Lagrone, Community Development and Revitalization Senior Deputy Director  
Shawn Strange, Community Development and Revitalization Policy Development Manager



Delivered to the GLO:

Approved by the GLO:

**Council of Governments:** Houston-Galveston Area Council

**Allocation Calculation Sheet Packet Page Number:** Attachment 2, Page 14

## HUD MID and State MID Allocations

HUD MID Total	<b>\$445,466,000</b> <b>(91.1% of total)</b>
State MID Total	<b>\$43,296,000</b> <b>(8.9% of total)</b>
<b>Grand Total COG Allocation</b>	<b>488,762,000</b>

Table 1

## Funding Limits

Minimum Amount Waiver Requested	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Minimum Amount	<b>\$900,000</b> (see Attachment 4a for Minimum Amount Threshold Waiver approval)	
Maximum Amount	<b>NA</b>	

Table 2

## Regional Risk Mitigation

Explain how the method of distribution reduces regional risks, how it will foster long-term community resilience that is forward-looking and encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, and flooding in the HUD-identified and State-identified most impacted and distressed areas.

As a populous, low-lying coastal area transected by several major river basins and encompassing thousands of miles of streams and bayous, the 13-county Houston-Galveston region is highly vulnerable to flooding resulting from hurricanes, tropical depressions, and other storm events. The Houston-Galveston Area Council (H-GAC) has developed a consistent, understandable Method of Distribution (MOD) that reflects mitigation needs across the H-GAC region and its diverse communities. H-GAC staff conducted thorough research on potential objective factors and explored many scenarios involving different formulas and funding options with the H-GAC Board of Directors Water Resources Committee. Public comments and input from the Public Planning Meetings held on February 3, 2022, also resulted in revisions to the formula (reducing the date range of storms considered and increasing the weight of Low-to-Moderate Income population).

After this careful consideration, the following four factors were selected:

1. Households Impacted by historic disasters (2015-2019)
2. Real and Personal Property Damage (2015-2019)

3. Low-to-Moderate Income (LMI) Population
4. Population in the Floodplain

These factors draw from publicly available datasets and can be used to identify mitigation needs at the lowest level of Census geography (Block Group) for which HUD LMI data is published. Together, they provide an indicator of local mitigation needs based on past storm impact (people and property), social vulnerability (LMI population), and future risk (floodplain population).

Each of the factors was given equal weight (25%) in the allocation formula. The formula was used to allocate funding to cities and counties in the H-GAC region, with the exception of Harris County and cities (or portions of cities) located within Harris County. The reasoning behind this decision was that Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities.

Allocations for cities that received less than the \$900,000 minimum threshold in combined HUD and State MID allocations were rolled back up into the county totals. Some State MID counties and cities with HUD MID zip codes received both State and HUD MID allocations. Amounts from their HUD MID allocation can only be applied to projects benefitting the HUD MID areas. For those cities and counties whose combined HUD and State MID allocations are greater in total than \$900,000, but whose allocation in either the individual State or HUD MID allocation is less than \$900,000, the allocation for the ineligible category was added to their eligible category.

An additional base allocation of \$6 million is made to each HUD MID County, excluding Harris County, and \$4 million is made to each State MID County to promote and enhance counties' role in coordination and regional efforts in their jurisdictions.

An allocation of \$62,000,200 is made to H-GAC for regional priority projects. This allocation was proposed and approved by H-GAC's Board of Directors, of member governments representing both HUD MID and State MID areas, to emphasize regional efforts and priorities, and multi-jurisdictional approaches. The allocation is based on a value of \$6 million for each HUD MID county (except Harris County) and \$4 million for each State MID county in the region. The State MID valuation is further split between HUD MID zip code areas within the State MID counties and areas outside the HUD MID zip codes using the LMI population shares. However, the derivation of the value for the regional allocation is not indicative of how the allocation will be split between the HUD MID and State MID areas. \$11,300,200 of the \$62,000,200 will be set aside for projects benefitting State MID areas, and \$50,700,000 will be set aside for projects benefitting HUD MID areas (including HUD MID zip codes in State MID counties.) Project selection for this regional allocation will ensure that the overall allocation totals for HUD MID and State MID are met. These regional projects may include multi-jurisdictional partnerships addressing regional mitigation needs, regional projects from individual project sponsors, or local projects identified as serving regional priorities by mitigating severe and immediate community-wide risks for which there is no reasonable alternative and for which costs exceed the level of city-level allocations. H-GAC staff and the member governments of the H-GAC Board will identify, prioritize, and select projects based on their readiness, eligibility, and adherence to LMI and HUD MID and State MID funding thresholds. H-GAC, as a subrecipient of the GLO of mitigation funds for regional priority projects, will oversee the project proposal process, implementation of approved projects, and reporting to GLO. H-GAC will sign an interlocal agreement with subgrantees, who will be responsible as project sponsors for developing

their individual project proposals, adhering to all applicable requirements, managing all other aspects of implementing the projects, and working with H-GAC to provide information for reporting needs.

The H-GAC MOD **will reduce regional risks**, such as flooding and storm surge, by providing a base allocation to each county and rolling up the amounts allocated to cities of less than \$900,000 to the county where the city is located. This will provide a critical mass of funding at the county level to implement impactful larger scale projects individually or in partnership with other jurisdictions and agencies.

The H-GAC MOD also **encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, and flooding in the HUD-identified and State-identified most impacted and distressed areas** through an allocation to H-GAC for regional priority projects.

### **Reallocating Declined Funds**

To account for the possibility that some local governments may decline to accept and utilize funds allocated through the GLO conditionally-approved MOD, the following reallocation process will be used. Any funds not accepted in the initial funding acknowledgement process will be reallocated using H-GAC's MOD formula to 1) cities (or portions thereof) located in Harris County; and 2) general law cities in the region. Funds reallocated to these cities will be subject to the \$900,000 minimum threshold. Allocations to cities of less than \$900,000 will be redistributed to cities receiving a reallocation of more than \$900,000, based on their reallocation shares (unless the city received an allocation above that threshold in the initial MOD formula). Any city receiving a reallocation through this process will be asked to submit an acknowledgement letter for the new or revised amount. Harris County cities receiving an allocation through this process may expend that allocation within Harris County.

The H-GAC MOD **will foster long-term community resilience that is forward-looking** by allocating funding to individual cities based on four objective factors that identify local mitigation needs by past storm impacts to people and property, LMI population, and population within the floodplain. The floodplain factor, in particular, will help foster long-term community resilience since it accounts for populations that may not have had prior storm damage but are still at risk from future flooding events. Additionally, the H-GAC MOD will allow for the full range of eligible projects permitted under Community Development Block Grant-Mitigation funds to allow the flexibility necessary to meet the mitigation needs of H-GAC's diverse communities. H-GAC will also encourage counties to coordinate or plan projects with their cities that did not receive a direct allocation.

*Table 3*

## Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Households Impacted	25%	FEMA Individual Assistance Housing Registrants Census Block-level Disaster Data (2015-2019)	The data provides information on population impacted by recent disasters.
Personal and Real Property Damage	25%	FEMA Individual Assistance Housing Registrants Census Block Level Disaster Data (2015-2019)	The data provides information on real and personal property damage related to recent disasters.
Low-to-Moderate Income Population	25%	HUD FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data at Census Block group level	The data identifies the low-to-moderate income individuals in the region. H-GAC calculated LMI for cities by applying HUD's block group level LMI data to the Census 2020 city boundaries.
Population within Floodplain ( <i>floodway, 100-year floodplain, and 500-year floodplain</i> )	25%	FEMA National Flood Hazard data, 2020  2015-2019 US Census American Community Survey Data on household population and residential building points and from County Appraisal Districts	The data provides information on populations residing in the floodplain that could be impacted by future flooding.

Table 4

\*Add more rows if needed

## Threshold Factors

If any, please describe threshold factors that were used to allocate funds.

Threshold Factor	Documentation Source	Explanation of Factor Selection
\$900,000 minimum allocation for cities	State of Texas CDBG-MIT Action Plan	Any eligible city that does not receive a minimum of within \$900,000 based on the distribution factors, will not receive an allocation. The amount that would have been their allocation is rolled up to their respective county total.
No allocation for Harris County, or cities within Harris County	NA	This MOD excludes Harris County and cities (or portions thereof) within since Harris County has received a separate allocation of \$750,000,000 from GLO <sup>1</sup> for which it must develop its own MOD. Cities within Harris County whose boundaries extend into other counties receive an allocation based on the proportion of the city falling outside of Harris County (if that allocation exceeds the established minimum threshold). However, any initial allocations generated for cities in Harris County based on their presence in other counties cannot be used for projects in Harris County. Any funds designated for these cities as part of the re-allocation of declined funds are not subject to this restriction.

Table 5

<sup>1</sup> As detailed in the Action Plan Amendment 1, approved 3/18/22, available online at <https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-sap-amend-1.pdf>.

## Eligible Activities

Activities must meet the criteria outlined in the Regional Mitigation Program (COG MODs) section of the State of Texas CDBG Mitigation Action Plan.

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit subrecipients in the region to projects meeting regional priority activities.	
<b>-OR-</b>		
<input type="checkbox"/>	The COG has limited subrecipients in the region to selecting projects meeting the following regional priority activities:	
<input type="checkbox"/>	Flood control and drainage improvement, including the construction or rehabilitation of stormwater management systems	<input type="checkbox"/> Water and sewer facilities <input type="checkbox"/> Communications infrastructure <input type="checkbox"/> Provision of generators
<input type="checkbox"/>	Natural or green infrastructure	<input type="checkbox"/> Removal of debris
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/> Streets or bridges
<input type="checkbox"/>	Economic development (assistance to businesses for the installation of disaster mitigation improvements and technologies; financing to support the development of technologies, systems and other measures to mitigate future disaster impacts; “hardening” of commercial areas and facilities; and financing critical infrastructure sectors to allow continued commercial operations during and after disasters)	<input type="checkbox"/> Other infrastructure improvements
		<input type="checkbox"/> Public Services ( <i>within the 15% cap</i> )
		<input type="checkbox"/> FEMA Hazard Mitigation Grant Program (HMGP) cost share for CDBG-MIT eligible project
		<input type="checkbox"/> Buyouts or Acquisitions with or without relocation assistance, down payment assistance, housing incentives, or demolition
		<input type="checkbox"/> Activities designed to relocate families outside of floodplains

Table 6

Additionally, local governments receiving allocations may propose planning-only projects related to the regional priority activities. Allocated funds expended on these projects will not need to meet the LMI national objective and will be considered LMI neutral. GLO may add additional requirements or limitations to these project proposals, especially if they are in excess of any applicable funding caps.

## Ineligible Activities

Ineligible activities are outlined in the Regional Mitigation Program section of the State of Texas CDBG Mitigation Action Plan, as amended, and should be referenced accordingly.

Covered Projects

A Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds, regardless of source (CDBG-DR, CDBG-MIT, or CDBG). Covered projects included in the Regional Mitigation Program must meet specific criteria set forth by HUD’s CDBG-MIT Notice 84 FR 45838 (August 30, 2019) and the State of Texas Mitigation Action Plan. Inclusion of a Covered Project in the MOD does not guarantee funding until a full eligibility review is completed, and the subsequent action plan amendment receives HUD approval.

Will the Method of Distribution include a Covered Project?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
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Table 7

If yes, please provide the following information:

- The eligible entity benefitting from the project;
- A description of the project and how it meets the definition of a mitigation activity; and
- The cost of the Covered Project.

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Table 8

## Low-and Moderate-Income Requirements

Below is the strategic plan of how the method of distribution meets the minimum 50 percent low-and moderate-income (LMI) requirement.

This MOD will meet the minimum LMI requirement based on the strategic plan outlined below, which accounts for prior acknowledgement from recipients of LMI requirements, requirements of individual jurisdictions to adhere to the LMI requirement to ensure the aggregate LMI is met and plans for reallocating funds either not accepted or unused to ensure revised allocations continue to support the aggregate LMI requirement.

### Acknowledgement of Adherence to LMI Requirement

H-GAC will collect a formal acknowledgement from all entities receiving an allocation that they will

- Accept their funding allocation;
- Expend their allocation for eligible activities, as approved by GLO;
- Acknowledge that 50% of their allocation must be committed to be spent on projects benefitting populations that meet the HUD LMI national objective;
- Not expend funds on Covered Projects; and
- Otherwise adhere to all applicable requirements of this MOD, the GLO, and HUD requirements for the use, management and accounting of allocated funds.

Requiring each entity receiving an allocation to formally acknowledge that they will individually meet the LMI requirement for their allocation will ensure the aggregate LMI requirement for the MOD is met. H-GAC will also certify that the LMI requirement will be met in the aggregate of all regional priority projects funded through its allocation.

Table 9

## Public Hearing Information

The Action Plan requires at least one Public Planning Meeting prior to submitting the Preliminary MOD to the GLO for review and one Public Hearing before submission of the Preliminary MOD to GLO for final approval. If the COG holds multiple outreach activities, please contact the GLO for additional documentation forms.

Meeting Type	Public Planning Meeting	MOD Public Hearing
Date(s):	<ul style="list-style-type: none"> <li>2/3/2022, 10 AM</li> <li>2/3/2022, 2 PM</li> <li>2/3/2022, 6 PM</li> </ul>	<ul style="list-style-type: none"> <li>7/21/2022, 5:30 PM</li> </ul>
Location(s):	Virtual (Zoom meetings)	In-Person Meeting at H-GAC offices and Virtual (Zoom meeting)
Total Attendance:	189	62

Table 10

*Direct Notice.* As required, personal notice was sent to eligible entities at least **five (5)** days in advance of the public hearing using the following method(s) (at least one must be selected):

Method		Public Planning Meeting	MOD Public Hearing
		Date(s) Sent	Date(s) Sent
<input checked="" type="checkbox"/>	Email	1/26/2022	6/25/2022 7/4/2022 7/5/2022 7/6/2022
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

Table 11

*Website Notice.* As required, public notice was posted on the COG website at least **five (5)** days in advance:

Website Notice	Public Planning Meeting(s)	MOD Public Hearing
Date(s)	1/26/2022	7/21/2022

Table 12

*Published Notice.* As required, notice of the public hearing was published in at least one regional newspaper at least **three (3)** days in advance. Notice of the public hearings were published in the following regional newspaper(s):

Newspaper Name	Public Planning Meeting	MOD Public Hearing
	Date Published	Date Published
The Sealy News	1/27/2022	6/30/22
The (Brazoria County) Facts	1/26/2022	6/26/22
The Anahuac Progress	1/26/2022	6/29/22
The Colorado County Citizen	1/26/2022	7/6/22
Fort Bend Herald	1/27/2022	6/26/22
The Galveston Daily News	1/23/2022	6/24/22
Houston Chronicle	1/28/2022	6/25/22
The Vindicator Liberty County	1/27/2022	6/30/22
Bay City Tribune	1/26/2022	6/26/22
The Courier of Montgomery County	1/26/2022	6/24/22
The Huntsville Item	1/25/2022	6/26/22
The Waller Times	1/26/2022	6/29/22
The Wharton Journal-Spectator	1/22/2022	6/29/22
Forward Times	1/26/2022	6/29/22
La Informacion (Spanish)	1/27/2022	6/30/22
La Voz De Houston (Spanish)	N/A	6/30/22
Vietnam Moi News (Vietnamese)	1/26/2022	N/A
The Vietnam Post	N/A	7/22/22*
Southern News Group (Chinese)	1/30/2022	6/30/22

Table 13

\* Staff contacted a Vietnamese publication to post the notice in June; however, due to a communication error, we were unable to get the notice published until July 22, giving people 5 days notice before the end of the public comment period.

## Public Comment Period

Provide the dates of the public comment period for the COG MOD.

Start Date:	6/23/2022	End Date:	7/28/2022		No. of Days: 35	
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Table 14

## Citizen Participation

Describe how the COG conducted their citizen and non-governmental organization outreach, including any efforts exceeding GLO minimum public participation requirements. These efforts should comply with the Citizen Participation Plan provided to the GLO.

Beyond the minimum requirements that the GLO has outlined in the contract, H-GAC implemented the additional tactics listed below to increase overall public participation:

- Distributed electronic flyers and asked community organizations to share information with their audiences
  - H-GAC sent a one-page flyer that contains all the information about the meetings to identified stakeholders so they could either forward the information to their membership or print off the material to post on a bulletin board or high-traffic area at their location.
- Purchased legal ads in English, Spanish, Vietnamese, and Mandarin newspapers across the region.
- Purchased public meeting notice ads on H-GAC's social media channels (i.e., Facebook, Twitter, and Instagram).
- Sent direct emails to identified stakeholders (i.e., elected officials and staff, fair housing groups, long term recovery groups etc.)
  - In addition to direct emails to elected officials and staff representing jurisdictions across the 13-county region, H-GAC also invited the following groups to attend an informational meeting on July 14 to learn more about the Conditionally Approved MOD and ask questions, to attend the public hearing, and to provide comment in writing or verbally. State and Federal Elected Officials, Office of Emergency Management Staff, Regional Flood Management Committee Members, and Soil and Water Conservation staff.
  - To gain additional perspective on fair housing and civil rights issues in the region, H-GAC the following groups to attend an informational meeting on July 14 to learn more about the Conditionally Approved MOD and ask questions, to attend the public hearing, and to provide comment in writing or verbally. Community Development Directors and Staff, Faith-based Organizations, Neighborhood and Community Improvement Organizations. Long-Term Recovery Groups, Housing Authorities, Housing Advocacy Groups, Homeless Services Organizations, Food Banks, County Health Districts, and other non-profit organizations, including MMHR, NAACP, United Way, Habitat for Humanity, Area Agency on Aging, Meals on Wheels, LULAC, Houston Hispanic Chamber of Commerce, Greater Houston Asian Chamber of Commerce, Tri-County Black Chamber of Commerce, and Boys and Girls Clubs.
- Promoted public hearings through H-GAC's external newsletters, the *Community and Environmental Planning Update*, the *Economic Development Digest*, and the *Regional Focus*.
- Promoted public hearings by posting to community calendars and newsletters.
- Promoted public hearings on H-GAC's and Secretary of State's calendars and websites.
- Promoted public hearings via social media posts (i.e., Facebook, LinkedIn, Instagram, and Twitter).

Table 15

*Accommodations.* Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for persons with Limited English Proficiency and for people with hearing impairments or other access and functional needs (ADA compliance).

The Americans with Disabilities Act (ADA) stipulates that meetings involving the public must be accessible to individuals with disabilities. Meetings must comply with all applicable ADA accessibility requirements and should also be conducted in such a way that all participants can participate in an equal and meaningful way. H-GAC fully complies with these requirements through its internal policies and procedures. H-GAC facilitates public participation for individuals with disabilities using the following guidelines:

- Meetings, public hearings, and formal events are held in facilities accessible by persons with disabilities.
- American Sign Language interpreters are provided.
- All slides and images used throughout presentations are compliant for those with visual impairments.
- Public notices of meetings and events include a notice of accommodations for individuals who are disabled. Such accommodations will be provided by request with a minimum 24-hour notice.

Understanding that COVID-19 was still active, and to also provide consistency throughout this process, the public hearing was held online and in person so participants could safely participate. H-GAC hosted the public hearing at its offices in Houston and used the Zoom platform to allow participants to participate in person or to join via desktop, mobile phone, or dial-in should they have limited internet connectivity.

All public outreach efforts attempted to solicit as much feedback as possible by making meeting times and locations accessible and by working with organizations that provide public-focused services. Additionally, H-GAC provided multiple methods in which stakeholders could provide feedback including not only verbally and in chat, but also via email, voicemail, and web portal until 5 p.m. July 28, 2022.

Recognizing that the 13-county region is diverse, and using current census data, H-GAC provided Spanish, Vietnamese, and Mandarin interpreters at all Public Planning Meetings so participants could actively listen, ask questions, or engage in dialogue with H-GAC staff. American Sign Language interpreters were also present throughout an informational meeting on July 14 and the MOD Public Hearing on July 21. The availability of interpreters was advertised in all outreach materials. Any additional languages could be requested 48 hours in advance by calling 1-832-681-2583 or emailing [Ashley.Seals@h-gac.com](mailto:Ashley.Seals@h-gac.com).

Table 16

## **Affirmatively Furthering Fair Housing (AFFH) Statement**

All subrecipients will certify that they will affirmatively further fair housing (“AFFH”) in their grant agreements and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval of projects. Such review will include assessment of a proposed project’s area demography, socioeconomic characteristics, housing configuration and needs, educational, transportation, and health care opportunities, environmental hazards or concerns, and all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

## COG Principal Contact Information

Contact Name:	Chuck Wemple
Title:	Executive Director

Table 17

## Contact and Signatory Authority

Attached is a Resolution from the COG approving the method of distribution and authorizing its submittal to the Texas General Land Office. I certify that the contents of this document and all related attachments are complete and accurate.



[Charles Wemple \(Aug 31, 2022 11:44 CDT\)](#)

Signature

08/31/2022

Date

Charles Wemple

Printed Name

Executive Director

Title

Charles.wemple@h-gac.com

Email Address

713-993-4514

Telephone Number

H-GAC MOD Final Allocation Summary

Jurisdiction*	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount	Footnote
Alvin city	\$6,000,500	\$0	\$6,000,500	1.23%	0.00%	1.23%	50%	\$3,000,250	\$0	\$3,000,250	
Ames city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Anahuac city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Angleton city	\$1,792,900	\$0	\$1,792,900	0.37%	0.00%	0.37%	50%	\$896,450	\$0	\$896,450	
Arcola city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Austin county	\$0	\$6,750,100	\$6,750,100	0.00%	1.38%	1.38%	50%	\$0	\$3,375,050	\$3,375,050	
Bailey's Prairie village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Bay City city (77414)	\$3,189,500	\$0	\$3,189,500	0.65%	0.00%	0.65%	50%	\$1,594,750	\$0	\$1,594,750	
Bayou Vista city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Baytown city (Chambers County)	\$2,686,900	\$0	\$2,686,900	0.55%	0.00%	0.55%	50%	\$1,343,450	\$0	\$1,343,450	c
Beach City city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Beasley city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Bellaire city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Bellville city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Bonney village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Brazoria city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Brazoria county	\$43,326,900	\$0	\$43,326,900	8.86%	0.00%	8.86%	50%	\$21,663,450	\$0	\$21,663,450	
Brazos Country city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Brookshire city (77423)	\$1,310,000	\$0	\$1,310,000	0.27%	0.00%	0.27%	50%	\$655,000	\$0	\$655,000	
Brookside Village city	\$1,580,200	\$0	\$1,580,200	0.32%	0.00%	0.32%	50%	\$790,100	\$0	\$790,100	
Bunker Hill Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Chambers county	\$14,923,200	\$0	\$14,923,200	3.05%	0.00%	3.05%	50%	\$7,461,600	\$0	\$7,461,600	
Clear Lake Shores city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Cleveland city	\$1,498,300	\$0	\$1,498,300	0.31%	0.00%	0.31%	50%	\$749,150	\$0	\$749,150	
Clute city	\$1,220,900	\$0	\$1,220,900	0.25%	0.00%	0.25%	50%	\$610,450	\$0	\$610,450	
Colorado county	\$0	\$5,284,400	\$5,284,400	0.00%	1.08%	1.08%	50%	\$0	\$2,642,200	\$2,642,200	
Columbus city (78934)	\$1,018,300	\$0	\$1,018,300	0.21%	0.00%	0.21%	50%	\$509,150	\$0	\$509,150	
Conroe city	\$7,584,700	\$0	\$7,584,700	1.55%	0.00%	1.55%	50%	\$3,792,350	\$0	\$3,792,350	
Cove city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Cut and Shoot city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Daisetta city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Danbury city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Dayton city	\$1,453,600	\$0	\$1,453,600	0.30%	0.00%	0.30%	50%	\$726,800	\$0	\$726,800	
Dayton Lakes city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Deer Park city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Devers city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Dickinson city	\$15,761,000	\$0	\$15,761,000	3.22%	0.00%	3.22%	50%	\$7,880,500	\$0	\$7,880,500	
Eagle Lake city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
East Bernard city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
El Campo city	\$1,554,100	\$0	\$1,554,100	0.32%	0.00%	0.32%	50%	\$777,050	\$0	\$777,050	
El Lago city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Fairchilds village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a

H-GAC MOD Final Allocation Summary

Jurisdiction*	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount	Footnote
Fort Bend county	\$56,030,000	\$0	\$56,030,000	11.46%	0.00%	11.46%	50%	\$28,015,000	\$0	\$28,015,000	
Freeport city	\$1,838,000	\$0	\$1,838,000	0.38%	0.00%	0.38%	50%	\$919,000	\$0	\$919,000	
Friendswood City (Galveston County)	\$4,636,100	\$0	\$4,636,100	0.95%	0.00%	0.95%	50%	\$2,318,050	\$0	\$2,318,050	c
Fulshear city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Galena Park city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Galveston city	\$15,761,400	\$0	\$15,761,400	3.22%	0.00%	3.22%	50%	\$7,880,700	\$0	\$7,880,700	
Galveston county	\$18,221,200	\$0	\$18,221,200	3.73%	0.00%	3.73%	50%	\$9,110,600	\$0	\$9,110,600	
Hardin city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Harris county	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Hedwig Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Hempstead city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Hillcrest village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Hilshire Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Hitchcock city	\$3,864,200	\$0	\$3,864,200	0.79%	0.00%	0.79%	50%	\$1,932,100	\$0	\$1,932,100	
Holiday Lakes town	\$1,582,000	\$0	\$1,582,000	0.32%	0.00%	0.32%	50%	\$791,000	\$0	\$791,000	
Houston City (Fort Bend and Montgomery County)	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	c, e
Houston City (Harris County)	\$10,790,000	\$0	\$10,790,000	2.21%	0.00%	2.21%	50%	\$5,395,000	\$0	\$5,395,000	f
Humble city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Hunters Creek Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Huntsville city (77320)	\$932,600	\$1,323,600	\$2,256,200	0.19%	0.27%	0.46%	50%	\$466,300	\$661,800	\$1,128,100	
Industry city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Iowa Colony	\$958,800	\$0	\$958,800	0.20%	0.00%	0.20%	50%	\$479,400	\$0	\$479,400	d
Jacinto City city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Jamaica Beach city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Jersey Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Jones Creek village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Katy City (Fort Bend County, Zipcode 77493)	\$1,128,100	\$0	\$1,128,100	0.23%	0.00%	0.23%	50%	\$564,050	\$0	\$564,050	c
Kemah city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Kendleton city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Kenefick town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
La Marque city	\$4,165,500	\$0	\$4,165,500	0.85%	0.00%	0.85%	50%	\$2,082,750	\$0	\$2,082,750	
La Porte city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Lake Jackson city	\$2,138,700	\$0	\$2,138,700	0.44%	0.00%	0.44%	50%	\$1,069,350	\$0	\$1,069,350	
League City city (Galveston County)	\$15,561,500	\$0	\$15,561,500	3.18%	0.00%	3.18%	50%	\$7,780,750	\$0	\$7,780,750	c
Liberty city	\$2,684,300	\$0	\$2,684,300	0.55%	0.00%	0.55%	50%	\$1,342,150	\$0	\$1,342,150	
Liberty county	\$21,274,200	\$0	\$21,274,200	4.35%	0.00%	4.35%	50%	\$10,637,100	\$0	\$10,637,100	
Liverpool city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Magnolia city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Manvel city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	e
Matagorda Count (77414, 77482)	\$2,746,400	\$5,301,900	\$8,048,300	0.56%	1.08%	1.65%	50%	\$1,373,200	\$2,650,950	\$4,024,150	
Meadows Place city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Missouri City city (Fort Bend County)	\$5,070,900	\$0	\$5,070,900	1.04%	0.00%	1.04%	50%	\$2,535,450	\$0	\$2,535,450	c

H-GAC MOD Final Allocation Summary

Jurisdiction*	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount	Footnote
Mont Belvieu city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Montgomery city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Montgomery county	\$60,375,000	\$0	\$60,375,000	12.35%	0.00%	12.35%	50%	\$30,187,500	\$0	\$30,187,500	
Morgan's Point city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Nassau Bay city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Needville city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
New Waverly city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
North Cleveland city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Oak Ridge North city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Old River-Winfree city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Orchard city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Oyster Creek city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Palacios city	\$0	\$1,384,700	\$1,384,700	0.00%	0.28%	0.28%	50%	\$0	\$692,350	\$692,350	
Panorama Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Pasadena city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Pattison city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Patton Village city	\$1,259,100	\$0	\$1,259,100	0.26%	0.00%	0.26%	50%	\$629,550	\$0	\$629,550	
Pearland City (Brazoria and Fort Bend County)	\$14,008,900	\$0	\$14,008,900	2.87%	0.00%	2.87%	50%	\$7,004,450	\$0	\$7,004,450	c
Pine Island town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Piney Point Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Pleak village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Plum Grove city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Prairie View city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Quintana town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Regional Priority Projects (H-GAC Allocation)	\$50,700,000	\$11,300,200	\$62,000,200	10.37%	2.31%	12.69%	50%	\$25,350,000	\$5,650,100	\$31,000,100	
Richmond city	\$1,535,500	\$0	\$1,535,500	0.31%	0.00%	0.31%	50%	\$767,750	\$0	\$767,750	
Richwood city	\$2,456,500	\$0	\$2,456,500	0.50%	0.00%	0.50%	50%	\$1,228,250	\$0	\$1,228,250	
Riverside city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Roman Forest city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Rosenberg city	\$4,121,300	\$0	\$4,121,300	0.84%	0.00%	0.84%	50%	\$2,060,650	\$0	\$2,060,650	
San Felipe town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Sandy Point city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Santa Fe city	\$2,743,700	\$0	\$2,743,700	0.56%	0.00%	0.56%	50%	\$1,371,850	\$0	\$1,371,850	
Seabrook city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Sealy city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Shenandoah city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Shoreacres city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Simonton city	\$1,559,100	\$0	\$1,559,100	0.32%	0.00%	0.32%	50%	\$779,550	\$0	\$779,550	
South Frydek city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
South Houston city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Southside Place city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Splendora city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a

H-GAC MOD Final Allocation Summary

Jurisdiction*	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount	Footnote
Spring Valley Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Stafford city (Fort Bend County)	\$1,228,100	\$0	\$1,228,100	0.25%	0.00%	0.25%	50%	\$614,050	\$0	\$614,050	c
Stagecoach town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Sugar Land city	\$4,063,600	\$0	\$4,063,600	0.83%	0.00%	0.83%	50%	\$2,031,800	\$0	\$2,031,800	
Surfside Beach city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Sweeny city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Taylor Lake Village city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Texas City city	\$8,012,700	\$0	\$8,012,700	1.64%	0.00%	1.64%	50%	\$4,006,350	\$0	\$4,006,350	
Thompsons town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Tiki Island village	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Tomball city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Walker County (77320)	\$1,281,200	\$4,893,800	\$6,175,000	0.26%	1.00%	1.26%	50%	\$640,600	\$2,446,900	\$3,087,500	
Waller city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Waller County (77423, 77493)	\$1,717,100	\$7,057,300	\$8,774,400	0.35%	1.44%	1.80%	50%	\$858,550	\$3,528,650	\$4,387,200	
Wallis city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Webster city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Weimar city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
West Columbia city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
West University Place city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	b
Weston Lakes city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Wharton city	\$4,360,800	\$0	\$4,360,800	0.89%	0.00%	0.89%	50%	\$2,180,400	\$0	\$2,180,400	
Wharton county	\$11,758,500	\$0	\$11,758,500	2.41%	0.00%	2.41%	50%	\$5,879,250	\$0	\$5,879,250	
Willis city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Woodbranch city	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Woodloch town	\$0	\$0	\$0	0.00%	0.00%	0.00%	50%	\$0	\$0	\$0	a
Total Allocation	\$445,466,000	\$43,296,000	\$488,762,000	91.14%	8.86%	100.00%	50%	\$222,733,000	\$21,648,000	\$244,381,000	

Footnote

a- This city did not meet the minimum allocation threshold, and thus had its allocation rolled up to its County.

b- Harris County and its cities are excluded from this MOD as Harris County received a direct allocation of \$750M from Texas General Land Office.

c- This city's allocation excludes the Harris County portion of the city. Harris County cities receiving initial allocations from portions of their city in other counties may not use this allocations for Harris County projects. Funds allocated to thes

d- This MOD reflects that H-GAC submitted and received a waiver of the minimum allocation threshold for jurisdictions whose allocations are within 10% of the \$1M threshold.

e- Jurisdictions declined allocation

f- Reallocation funds

\*- Zip codes/ Counties in the parenthesis reflect where the HUDMID allocation can be spent.

H-GAC MOD Final Allocation Summary

	HUDMID Allocation Zip code Portion											
Jurisdiction*	77320	77414	77423	77482	77493	78934	HUDMID Allocation Outside of Zip codes	HUDMID Allocation	STMID Allocation	Allocation	Declined HUDMID Allocation	Declined STMID Allocation
Alvin city	\$0	\$0	\$0	\$0	\$0	\$0	\$6,000,500	\$6,000,500	\$0	\$6,000,500		
Ames city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Anahuac city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Angleton city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,792,900	\$1,792,900	\$0	\$1,792,900		
Arcola city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Austin county	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,750,100	\$6,750,100		
Bailey's Prairie village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Bay City city (77414)	\$0	\$3,189,500	\$0	\$0	\$0	\$0	\$0	\$3,189,500	\$0	\$3,189,500		
Bayou Vista city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Baytown city (Chambers County)	\$0	\$0	\$0	\$0	\$0	\$0	\$2,686,900	\$2,686,900	\$0	\$2,686,900		
Beach City city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Beasley city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Bellaire city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Bellville city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Bonney village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Brazoria city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Brazoria county	\$0	\$0	\$0	\$0	\$0	\$0	\$43,326,900	\$43,326,900	\$0	\$43,326,900		
Brazos Country city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Brookshire city (77423)	\$0	\$0	\$1,310,000	\$0	\$0	\$0	\$0	\$1,310,000	\$0	\$1,310,000		
Brookside Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,580,200	\$1,580,200	\$0	\$1,580,200		
Bunker Hill Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Chambers county	\$0	\$0	\$0	\$0	\$0	\$0	\$14,923,200	\$14,923,200	\$0	\$14,923,200		
Clear Lake Shores city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Cleveland city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,498,300	\$1,498,300	\$0	\$1,498,300		
Clute city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,220,900	\$1,220,900	\$0	\$1,220,900		
Colorado county	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,284,400	\$5,284,400		
Columbus city (78934)	\$0	\$0	\$0	\$0	\$0	\$1,018,300	\$0	\$1,018,300	\$0	\$1,018,300		
Conroe city	\$0	\$0	\$0	\$0	\$0	\$0	\$7,584,700	\$7,584,700	\$0	\$7,584,700		
Cove city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Cut and Shoot city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Daisetta city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Danbury city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Dayton city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,453,600	\$1,453,600	\$0	\$1,453,600		
Dayton Lakes city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Deer Park city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Devers city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Dickinson city	\$0	\$0	\$0	\$0	\$0	\$0	\$15,761,000	\$15,761,000	\$0	\$15,761,000		
Eagle Lake city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
East Bernard city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
El Campo city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,554,100	\$1,554,100	\$0	\$1,554,100		
El Lago city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Fairchilds village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		

H-GAC MOD Final Allocation Summary

	HUDMID Allocation Zip code Portion											
Jurisdiction*	77320	77414	77423	77482	77493	78934	HUDMID Allocation Outside of Zip codes	HUDMID Allocation	STMID Allocation	Allocation	Declined HUDMID Allocation	Declined STMID Allocation
Fort Bend county	\$0	\$0	\$0	\$0	\$0	\$0	\$56,030,000	\$56,030,000	\$0	\$56,030,000		
Freeport city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,838,000	\$1,838,000	\$0	\$1,838,000		
Friendswood City (Galveston County)	\$0	\$0	\$0	\$0	\$0	\$0	\$4,636,100	\$4,636,100	\$0	\$4,636,100		
Fulshear city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Galena Park city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Galveston city	\$0	\$0	\$0	\$0	\$0	\$0	\$15,761,400	\$15,761,400	\$0	\$15,761,400		
Galveston county	\$0	\$0	\$0	\$0	\$0	\$0	\$18,221,200	\$18,221,200	\$0	\$18,221,200		
Hardin city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Harris county	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hedwig Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hempstead city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hillcrest village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hilshire Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hitchcock city	\$0	\$0	\$0	\$0	\$0	\$0	\$3,864,200	\$3,864,200	\$0	\$3,864,200		
Holiday Lakes town	\$0	\$0	\$0	\$0	\$0	\$0	\$1,582,000	\$1,582,000	\$0	\$1,582,000		
Houston City (Fort Bend and Montgomery County)	\$0	\$0	\$0	\$0	\$0	\$0	\$9,232,700	\$9,232,700	\$0	\$9,232,700	\$9,232,700	\$0
Houston City (Harris County)	\$0	\$0	\$0	\$0	\$0	\$0						
Humble city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hunters Creek Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Huntsville city (77320)	\$932,600	\$0	\$0	\$0	\$0	\$0	\$0	\$932,600	\$1,323,600	\$2,256,200		
Industry city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Iowa Colony	\$0	\$0	\$0	\$0	\$0	\$0	\$958,800	\$958,800	\$0	\$958,800		
Jacinto City city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Jamaica Beach city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Jersey Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Jones Creek village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Katy City (Fort Bend County, Zipcode 77493)	\$0	\$0	\$0	\$0	\$769,500	\$0	\$358,600	\$1,128,100	\$0	\$1,128,100		
Kemah city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Kendleton city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Kenefick town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
La Marque city	\$0	\$0	\$0	\$0	\$0	\$0	\$4,165,500	\$4,165,500	\$0	\$4,165,500		
La Porte city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Lake Jackson city	\$0	\$0	\$0	\$0	\$0	\$0	\$2,138,700	\$2,138,700	\$0	\$2,138,700		
League City city (Galveston County)	\$0	\$0	\$0	\$0	\$0	\$0	\$15,561,500	\$15,561,500	\$0	\$15,561,500		
Liberty city	\$0	\$0	\$0	\$0	\$0	\$0	\$2,684,300	\$2,684,300	\$0	\$2,684,300		
Liberty county	\$0	\$0	\$0	\$0	\$0	\$0	\$21,274,200	\$21,274,200	\$0	\$21,274,200		
Liverpool city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Magnolia city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Manvel city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,557,300	\$1,557,300	\$0	\$1,557,300	\$1,557,300	\$0
Matagorda Count (77414, 77482)	\$0	\$2,065,700	\$0	\$680,700	\$0	\$0	\$0	\$2,746,400	\$5,301,900	\$8,048,300		
Meadows Place city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Missouri City city (Fort Bend County)	\$0	\$0	\$0	\$0	\$0	\$0	\$5,070,900	\$5,070,900	\$0	\$5,070,900		

H-GAC MOD Final Allocation Summary

	HUDMID Allocation Zip code Portion											
Jurisdiction*	77320	77414	77423	77482	77493	78934	HUDMID Allocation Outside of Zip codes	HUDMID Allocation	STMID Allocation	Allocation	Declined HUDMID Allocation	Declined STMID Allocation
Mont Belvieu city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Montgomery city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Montgomery county	\$0	\$0	\$0	\$0	\$0	\$0	\$60,375,000	\$60,375,000	\$0	\$60,375,000		
Morgan's Point city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Nassau Bay city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Needville city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
New Waverly city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
North Cleveland city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Oak Ridge North city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Old River-Winfree city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Orchard city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Oyster Creek city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Palacios city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,384,700	\$1,384,700		
Panorama Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Pasadena city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Pattison city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Patton Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,259,100	\$1,259,100	\$0	\$1,259,100		
Pearland City (Brazoria and Fort Bend County)	\$0	\$0	\$0	\$0	\$0	\$0	\$14,008,900	\$14,008,900	\$0	\$14,008,900		
Pine Island town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Piney Point Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Pleak village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Plum Grove city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Prairie View city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Quintana town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Regional Priority Projects (H-GAC Allocation)	\$0	\$0	\$0	\$0	\$0	\$0	\$50,700,000	\$50,700,000	\$11,300,200	\$62,000,200		
Richmond city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,535,500	\$1,535,500	\$0	\$1,535,500		
Richwood city	\$0	\$0	\$0	\$0	\$0	\$0	\$2,456,500	\$2,456,500	\$0	\$2,456,500		
Riverside city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Roman Forest city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Rosenberg city	\$0	\$0	\$0	\$0	\$0	\$0	\$4,121,300	\$4,121,300	\$0	\$4,121,300		
San Felipe town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Sandy Point city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Santa Fe city	\$0	\$0	\$0	\$0	\$0	\$0	\$2,743,700	\$2,743,700	\$0	\$2,743,700		
Seabrook city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Sealy city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Shenandoah city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Shoreacres city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Simonton city	\$0	\$0	\$0	\$0	\$0	\$0	\$1,559,100	\$1,559,100	\$0	\$1,559,100		
South Frydek city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
South Houston city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Southside Place city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Splendora city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		

H-GAC MOD Final Allocation Summary

	HUDMID Allocation Zip code Portion											
Jurisdiction*	77320	77414	77423	77482	77493	78934	HUDMID Allocation Outside of Zip codes	HUDMID Allocation	STMID Allocation	Allocation	Declined HUDMID Allocation	Declined STMID Allocation
Spring Valley Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Stafford city (Fort Bend County)	\$0	\$0	\$0	\$0	\$0	\$0	\$1,228,100	\$1,228,100	\$0	\$1,228,100		
Stagecoach town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Sugar Land city	\$0	\$0	\$0	\$0	\$0	\$0	\$4,063,600	\$4,063,600	\$0	\$4,063,600		
Surfside Beach city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Sweeny city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Taylor Lake Village city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Texas City city	\$0	\$0	\$0	\$0	\$0	\$0	\$8,012,700	\$8,012,700	\$0	\$8,012,700		
Thompsons town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Tiki Island village	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Tomball city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Walker County (77320)	\$1,281,200	\$0	\$0	\$0	\$0	\$0	\$0	\$1,281,200	\$4,893,800	\$6,175,000		
Waller city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Waller County (77423, 77493)	\$0	\$0	\$1,554,100	\$0	\$163,000	\$0	\$0	\$1,717,100	\$7,057,300	\$8,774,400		
Wallis city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Webster city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Weimar city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
West Columbia city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
West University Place city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Weston Lakes city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Wharton city	\$0	\$0	\$0	\$0	\$0	\$0	\$4,360,800	\$4,360,800	\$0	\$4,360,800		
Wharton county	\$0	\$0	\$0	\$0	\$0	\$0	\$11,758,500	\$11,758,500	\$0	\$11,758,500		
Willis city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Woodbranch city	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Woodloch town	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Total Allocation	\$2,213,800	\$5,255,200	\$2,864,100	\$680,700	\$932,500	\$1,018,300	\$432,501,400	\$445,466,000	\$43,296,000	\$488,762,000		

Footnote

a- This city did not meet the minimum allocation threshold, a

b- Harris County and its cities are excluded from this MOD as

c- This city's allocation excludes the Harris County portion of te cities as part of re-allocation of declined funds can be used for Harris County projects.

d- This MOD reflects that H-GAC submitted and received a wa

e- Jurisdictions declined allocation

f- Reallocation funds

\*- Zip codes/ Counties in the parenthsis reflect where the HUI

Jurisdiction*	Declined Allocation
Alvin city	
Ames city	
Anahuac city	
Angleton city	
Arcola city	
Austin county	
Bailey's Prairie village	
Bay City city (77414)	
Bayou Vista city	
Baytown city (Chambers County)	
Beach City city	
Beasley city	
Bellaire city	
Bellville city	
Bonney village	
Brazoria city	
Brazoria county	
Brazos Country city	
Brookshire city (77423)	
Brookside Village city	
Bunker Hill Village city	
Chambers county	
Clear Lake Shores city	
Cleveland city	
Clute city	
Colorado county	
Columbus city (78934)	
Conroe city	
Cove city	
Cut and Shoot city	
Daisetta city	
Danbury city	
Dayton city	
Dayton Lakes city	
Deer Park city	
Devers city	
Dickinson city	
Eagle Lake city	
East Bernard city	
El Campo city	
El Lago city	
Fairchilds village	

Jurisdiction*	Declined Allocation
Fort Bend county	
Freeport city	
Friendswood City (Galveston County)	
Fulshear city	
Galena Park city	
Galveston city	
Galveston county	
Hardin city	
Harris county	
Hedwig Village city	
Hempstead city	
Hillcrest village	
Hilshire Village city	
Hitchcock city	
Holiday Lakes town	
Houston City (Fort Bend and Montgomery County)	\$9,232,700
Houston City (Harris County)	
Humble city	
Hunters Creek Village city	
Huntsville city (77320)	
Industry city	
Iowa Colony	
Jacinto City city	
Jamaica Beach city	
Jersey Village city	
Jones Creek village	
Katy City (Fort Bend County, Zipcode 77493)	
Kemah city	
Kendleton city	
Kenefick town	
La Marque city	
La Porte city	
Lake Jackson city	
League City city (Galveston County)	
Liberty city	
Liberty county	
Liverpool city	
Magnolia city	
Manvel city	\$1,557,300
Matagorda Count (77414, 77482)	
Meadows Place city	
Missouri City city (Fort Bend County)	

Jurisdiction*	Declined Allocation
Mont Belvieu city	
Montgomery city	
Montgomery county	
Morgan's Point city	
Nassau Bay city	
Needville city	
New Waverly city	
North Cleveland city	
Oak Ridge North city	
Old River-Winfree city	
Orchard city	
Oyster Creek city	
Palacios city	
Panorama Village city	
Pasadena city	
Pattison city	
Patton Village city	
Pearland City (Brazoria and Fort Bend County)	
Pine Island town	
Piney Point Village city	
Pleak village	
Plum Grove city	
Prairie View city	
Quintana town	
Regional Priority Projects (H-GAC Allocation)	
Richmond city	
Richwood city	
Riverside city	
Roman Forest city	
Rosenberg city	
San Felipe town	
Sandy Point city	
Santa Fe city	
Seabrook city	
Sealy city	
Shenandoah city	
Shoreacres city	
Simonton city	
South Frydek city	
South Houston city	
Southside Place city	
Splendora city	

Jurisdiction*	Declined Allocation
Spring Valley Village city	
Stafford city (Fort Bend County)	
Stagecoach town	
Sugar Land city	
Surfside Beach city	
Sweeny city	
Taylor Lake Village city	
Texas City city	
Thompsons town	
Tiki Island village	
Tomball city	
Walker County (77320)	
Waller city	
Waller County (77423, 77493)	
Wallis city	
Webster city	
Weimar city	
West Columbia city	
West University Place city	
Weston Lakes city	
Wharton city	
Wharton county	
Willis city	
Woodbranch city	
Woodloch town	
Total Allocation	

Footnote

a- This city did not meet the minimum allocation threshold, a

b- Harris County and its cities are excluded from this MOD as

c- This city's allocation excludes the Harris County portion of t

d- This MOD reflects that H-GAC submitted and received a wa

e- Jurisdictions declined allocation

f- Reallocation funds

\*- Zip codes/ Counties in the parenthesis reflect where the HUI

Reallocation										
Jurisdiction*	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount
Houston City (Harris County)	\$10,790,000	\$0	\$10,790,000	100%	0%	100%	50%	\$5,395,000	\$0	\$5,395,000

Final Summary										
	Final HUDMID Allocation	Final STMID Allocation	Final Total Allocation	HUDMID Allocation Share	STMID Allocation Share	Total Allocation Share	LMI Percentage	HUDMID LMI Amount	STMID LMI Amount	Total LMI Amount
Allocation	\$434,676,000	\$43,296,000	\$477,972,000	91%	9%	100%	50%	\$217,338,000	\$21,648,000	\$238,986,000
Reallocation	\$10,790,000	\$0	\$10,790,000	100%	0%	100%	50%	\$5,395,000	\$0	\$5,395,000
Total	\$445,466,000	\$43,296,000	\$488,762,000					\$222,733,000	\$21,648,000	\$244,381,000

\*- Zip codes/ Counties in the parenthesis reflect where the HUDMID allocation can be spent.



# RESOLUTION

AUTHORIZING THE EXECUTIVE DIRECTOR TO SUBMIT THE METHOD OF DISTRIBUTION FORM AND ALL RELATED DOCUMENTS FOR COMMUNITY DEVELOPMENT BLOCK GRANT - MITIGATION FUNDS TO THE TEXAS GENERAL LAND OFFICE.

WHEREAS, catastrophic storm events including Hurricane Harvey have directly impacted the Houston-Galveston Area Council (H-GAC) region with devastating flooding, damaging and destroying homes, businesses, and public infrastructure; and

WHEREAS, Congress has appropriated Community Development Block Grant - Mitigation funds that can help the region increase its resilience to future disaster events, and the U.S. Department of Housing and Urban Development has announced its allocation of those funds to the State of Texas; and

WHEREAS, Governor Abbott designated the Texas General Land Office as the primary state agency to oversee allocation and administration of those funds; and

WHEREAS, the Texas General Land Office has developed a federally-approved State Action Plan, which has been subsequently amended, that apportions Community Development Block Grant - Mitigation funds to a Regional Mitigation Program, under which Councils of Governments will develop a Method of Distribution that uses a methodology to allocate Community Development Block Grant - Mitigation funds to eligible local governments in their regions for a range of disaster mitigation activities; and

WHEREAS, under the Texas General Land Office State Action Plan Amendment 1, the Houston-Galveston Area Council has been allocated \$488,762,000 for its Method of Distribution and Harris County has been allocated \$750,000,000 in Community Development Block Grant-Mitigation funding, for which it must also develop its own Method of Distribution; and

WHEREAS, H-GAC developed a draft Method of Distribution for Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Walker, Waller, and Wharton counties with all requirements for public notice and comment including publishing notice of its availability, publishing notice of and conducting one public hearing and receiving verbal and written comments; and

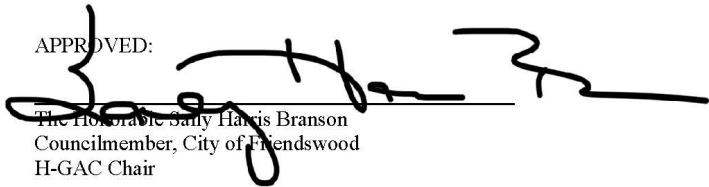
WHEREAS, taking into account public comments, H-GAC presented a final Method of Distribution at H-GAC's Board of Directors meeting on August 16<sup>th</sup>, 2022, which was duly posted and conducted in accordance with the Texas Open Meetings Act.

NOW, THEREFORE BE IT RESOLVED BY THE H-GAC BOARD OF DIRECTORS:

1. THAT the Method of Distribution of the H-GAC region is hereby approved; and
2. THAT the Executive Director of the Houston-Galveston Area Council is duly authorized to execute the Method of Distribution and all other supporting documents; and
3. THAT this is a true and correct copy of the resolution reciting the actions and approvals given by the Board of Directors at its meeting on August 16<sup>th</sup>, 2022.

PASSED AND APPROVED this 16<sup>th</sup> day of August 2022 at a regularly scheduled meeting of the Board of Directors of the Houston-Galveston Area Council.

APPROVED:

  
The Honorable Sally Harris Branson  
Councilmember, City of Friendswood  
H-GAC Chair

ATTEST:

  
Rissie Owens (Aug 22, 2022 20:34 CDT)

The Honorable Rissie Owens  
Trustee, Huntsville Independent School District  
H-GAC Vice Chair

## Funding Acknowledgement Summary Documentation

## Local Jurisdiction Acknowledgement Letters Summary

After receiving conditional approval from the Texas General Land Office for the preliminary Method of Distribution, the Houston-Galveston Area Council contacted the chief elected official for each local government that would receive an allocation. The letters requested that each entity notify H-GAC of their decision to accept or decline their allocation.

Initially fifty-one (51) entities accepted their allocations. Two entities, the City of Houston and the City of Manvel, declined their allocations.

### Declined Allocations by Governments

<b>Jurisdiction</b>	<b>Declined Allocation</b>
City of Houston	\$9,232,700
City of Manvel	\$1,557,300
<b>Total</b>	<b>\$10,790,000</b>

The reallocation methodology in the conditionally approved Method of Distribution calls for any declined funds to be reallocated to Harris County cities and General Law cities in the region. Cities must receive a minimum of \$900,000 in reallocated funds, using the same formula as the initial allocations, to be eligible. The proposed initial reallocation was made to the City of Houston, as no other eligible city received a reallocation amount above the minimum threshold, using the same formula and factors as the initial allocations. The City of Houston accepted the reallocation.

### Reallocations Based on City of Houston Accepted Reallocated Funds

<b>Jurisdiction</b>	<b>Reallocation</b>
City of Houston	\$10,790,000

## Initial Distribtuion

Date Received	Yes/No	Jurisdiction	Signed By
8/9/2022	Yes	City of Alvin	Dixie Roberts, Alvin City Secretary
7/5/2022	Yes	City of Angleton	Jason Perez, Angleton Mayor
7/28/2022	Yes	Austin County	Tim Lapham, Austin County Judge
7/27/2022	Yes	City of Bay City	Robert K. Nelson, Bay City Mayor
8/3/2022	Yes	City of Baytown	Brandon Capetillo, Baytown Mayor
7/13/2022	Yes	Brazoria County	L.M. "Matt" Sebesta, Jr., Brazoria County Judge
8/3/2022	Yes	City of Brookshire	Darrell Branch, Brookshire Mayor
8/5/2022	Yes	City of Brookside Village	Glenda Hundl, Brookside Village Mayor
7/5/2022	Yes	Chambers County	Jimmy Sylvia, Chambers County Judge,
7/25/2022	Yes	City of Cleveland	Richard Boyett, Cleveland Mayor
8/5/2022	Yes	City of Clute	Christopher Snipes, Clute City Manager
7/11/2022	Yes	Colorado County	Ty Prause, Colorado County Judge
7/22/2022	Yes	City of Columbus	Lori An Gobert, Columus Mayor
7/22/2022	Yes	City of Conroe	Thomas E. Wolley Jr., Conroe Director of Capital Projects and Transportation
7/5/2022	Yes	City of Dayton	Caroline R. Wadzeck, Dayton Mayor, and Steve Floyd, City Manager
7/13/2022	Yes	City of Dickinson	Sean Skipworth, Dickinson Mayor
7/14/2022	Yes	City of El Campo	Chris Barbee, El Campo Mayor
7/21/2022	Yes	Fort Bend County	K.P. George, Fort Bend County Judge
7/18/2022	Yes	City of Freeport	Brooks Bass, Freeport Mayor
7/28/2022	Yes	City of Friendswood	Mord Kabiri, City Manager
7/29/2022	Yes	City of Galveston	Brian Maxwell, Galveston City Manager
8/8/2022	Yes	Galveston County	Mark Henry, Galvston County Judge
7/7/2022	Yes	City of Hitchcock	Marie Gelles, Hitchcock City Manager
7/22/2022	Yes	Town of Holiday Lakes	Norman Schroeder, Holiday Lakes Mayor
8/5/2022	No	City of Houston	Marvalette Hunter, Mayor's Chief of Staff
7/1/2022	Yes	City of Huntsville	Aron Kulhavy, Huntsville City Manager
7/19/2022	Yes	Iowa Colony	Robert Hemminger, Iowa Colony City Manager
7/12/2022	Yes	City of Katy	William H. "Dusty" Theile, Katy Mayor
8/1/2022	Yes	City of La Marque	Keith Bell, La Marque Mayor
7/1/2022	Yes	City of Lake Jackson	Gerald Roznovsky, Lake Jackson Mayor
7/18/2022	Yes	City of League City	John Baumgartner, League City City Manager
7/5/2022	Yes	City of Liberty	Carl Pickett, Liberty Mayor

7/5/2022	Yes	Liberty County	Jay Knight, Liberty County Judge
8/1/2022	No	City of Manvel	Debra Davison, Manvel Mayor
7/11/2022	Yes	Matagorda County	Nate McDonald, Matagorda County Judge
8/3/2022	Yes	City of Missouri City	Robin J. Elackatt, Missouri City Mayor
7/11/2022	Yes	Montgomery County	Mark J. Keough, Montgomery County Judge
7/11/2022	Yes	City of Palacios	Jim Gardner, Palacios Mayor
7/28/2022	Yes	City of Patton Village	Scott Anderson, Patton Village Mayor
7/27/2022	Yes	City of Pearland	Clay J. Pearson, Pearland City Manager
7/20/2022	Yes	City of Richmond	Rebecca K. Haas, Richmond Mayor
6/30/2022	Yes	City of Richwood	Eric Foerester, Richwood City Manager
7/20/2022	Yes	City of Rosenberg	John Maresh, Rosenberg City Manager
7/18/2022	Yes	City of Santa Fe	Bill Pittman, Santa Fe Mayor
7/1/2022	Yes	City of Simonton	Jennifer Jones Ward, Simonton City Administrator
7/22/2022	Yes	City of Stafford	Cecil Willis Jr., Stafford Mayor
7/18/2022	Yes	City of Sugar Land	Joe R. Zimmerman, Sugar Land Mayor
7/27/2022	Yes	City of Texas City	Dedrick Johnson Sr., Texas City Mayor
8/8/2022	Yes	Walker County	Robert D. "Danny" Pierce, Walker County Judge
8/3/2022	Yes	Waller County	Carbett "Trey" Duhon III, Waller County Judge
7/27/2022	Yes	City of Wharton	Don Mueller, Wharton Mayor Pro Tem
7/11/2022	Yes	Wharton County	Phillip Spenrath, Wharton County Judge
7/20/2022	Yes	H-GAC	Chuck Wemple, Executive Director

#### Reallocation

Date Received	Yes/No	Jurisdiction	Signed By
8/15/2022	Yes	City of Houston	Marvalette Hunter, Mayor's Chief of Staff



March 1, 2022

Mr. Alex Swift  
Community Development & Revitalization  
Texas General Land Office  
1700 Congress Avenue  
Austin, Texas 78701

RE: Waiver Requests for Houston-Galveston Area Council Preliminary Method of Distribution

Dear Mr. Swift,

On February 15, 2022, the Board of the Houston-Galveston Area Council approved submitting our preliminary Method of Distribution to the Texas General Land Office. The Board action also included requesting two waivers: one regarding a slight decrease in the minimum allocation threshold and a second requesting the low-to-moderate income requirement be normalized with our regional average. Both waivers are intended to increase access to much-needed funds in communities that have substantial mitigation needs and to ensure areas of low to moderate residents in our region are not overlooked.

Pursuant to Sections 5.4.6.5.vii and 6.11 of the *State of Texas CDBG Mitigation (CDBG-MIT) Action Plan Amendment I*, the Houston-Galveston Area Council is requesting two waivers for its Method of Distribution being developed as part of the Texas General Land Office's Regional Mitigation Program for CDBG-MIT funds.

### **Minimum Threshold Waiver Request**

H-GAC is seeking a waiver to the minimum allocation threshold of \$1,000,000 that would apply to any local government whose allocation is within 10% of the minimum threshold (i.e., \$900,000 or higher). This waiver will expand access to much-needed funding for communities that would otherwise not receive an allocation due to minor changes in calculations or re-allocation of funds. Under the current preliminary Method of Distribution, one jurisdiction, The City of Iowa Colony meets this criterion, but other entities may be included in this category if their allocation changes before the final Method of Distribution is approved.

The City of Iowa Colony has an allocation under H-GAC's preliminary Method of Distribution formula of \$958,800. Iowa Colony is a fast-growing Home Rule city located in Brazoria County. Its LMI population is 53% and 21% of the City's total population is located within the floodplain (includes Floodway, 100-year and 500-year flood plain). Considering the city's significant Low-to-Moderate Income population and the substantial population at risk from future storms H-GAC believes this waiver, which is just \$41,200 below the minimum threshold,

is warranted. H-GAC may request subsequent waivers for other local governments that fall within this 10% threshold as the Method of Distribution formula is finalized based on public input and any redistribution of funds resulting from local governments not accepting their allocation.

### **Low-to-Moderate Income Threshold Waiver Request**

Based on the Houston-Galveston Area Council Board of Directors action approving H-GAC's Method of Distribution, H-GAC is also requesting a waiver for its Low-to-Moderate Income threshold requirement for this Method of Distribution to be set at 44%, the regional percentage of Low-to-Moderate Income population, of funds to be expended on projects benefitting 51% or higher Low-to-Moderate Income population. H-GAC believes this waiver is warranted in that it represents the diversity of communities impacted by disasters in the region that remain vulnerable to future disasters.

Seventy-two percent (72%) of the region's total Low-to-Moderate Income population outside of Harris County live in cities or unincorporated portions of counties where the overall Low-to-Moderate Income percentage is less than 51%. H-GAC believes that meeting the 50% funding threshold could in fact reduce the number of Low-to-Moderate Income residents who would benefit from much-needed projects. Reducing the Low-to-Moderate Income threshold to the 44% regional average would provide greater flexibility, particularly in delivering larger scale impactful projects.

H-GAC respectfully urges the Texas General Land Office to grant both waiver requests. Thank you in advance for your consideration and please let me know if you have any questions.

Sincerely,



Chuck Wemple

cc: Alexandra Gamble  
Shawn Strange  
Margaret Adams



TEXAS GENERAL LAND OFFICE  
GEORGE P. BUSH, COMMISSIONER

May 18, 2022

Charles Wemple, Executive Director  
Houston-Galveston Area Council  
PO Box 22777  
Houston, TX 77227

Re: Houston-Galveston Area Council (H-GAC) CDBG-MIT Regional Mitigation Program Waiver Requests

Dear Mr. Wemple:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has reviewed the requests to reduce the minimum funding allocation total to \$900,000 and to reduce the minimum regional Low- and Moderate-Income total expenditures from 50% to 44% of the total COG allocation and have come to the below decisions:

**Minimum Threshold Waiver Request**

The reduction of the minimum funding total of \$1,000,000 by 10% to \$900,000 will potentially result in additional entities receiving needed mitigation funding, while remaining large enough to allow for use on significant project(s). Because of this, we are pleased to inform you that this waiver request has been approved under section 5.4.6.5.viii of the Action Plan, as amended.

**Low-and Moderate-Income Waiver Request**

A significant portion of the CDBG-MIT Action Plan funds have not been expended, therefore the GLO is unable to ensure that a decrease to the H-GAC LMI minimum threshold would be accounted for in other programs. This waiver request has been denied under section 5.4.6.5.xiv of the Action Plan, as Amended.

Thank you for your hard work to help the region recover from the many disasters which have recently beset it, as well as better prepare Texas for any future storms. If you have any questions or require additional information, please contact Alex Swift at [alex.swift.glo@recovery.tex.gov](mailto:alex.swift.glo@recovery.tex.gov).

Sincerely,

*Alexandra Gamble*

Alexandra Gamble, Policy Development Director  
Community Development and Revitalization

Cc: Shawn Strange, Community Development and Revitalization Policy Development Manager

Comments and Responses for H-GAC MOD Public Hearing  
July 21, 2022

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

<b>Date Received</b>	<b>Method</b>	<b>Name</b>	<b>Role/Title</b>	<b>Comment</b>	<b>Response</b>
7/21/2022	Oral at Public Hearing	Arnetta Bailey	Iowa Colony Council Members?	Well, my name is Arnetta Murray, as you said Councilwoman in Brazoria County, my city is really the city of Iowa Colony. And I just want to make sure that the allocations are being or will be dispersed to the different towns and cities within Brazoria County. I was looking on here and I was hoping that other councilmembers from Brazoria County were here, but it looks like it's just only me. But the focus is I just want to make sure that Brazoria County as we see the possible allocation. But we just want to make sure that they get the money. As you know when the Harvey came and other storms, it's one way in basically one way out and that's 288. When 288 floods, it is horrific. So, I just want to ensure, we have small towns and cities, actually 28 in Brazoria County but the small ones such as Bailey's Prairie, Freeport, Jones Creek, even Brazoria Tx, we want to make sure that the money is given and that I can assure you that it's going to be allocated properly. Because we gotta, we can't forget the rural folks. So, I'm here speaking on behalf of the rural and all of the counties within Brazoria County. I love Harris County, I got parents in Harris County but right now I'm representing and speaking on behalf of Brazoria County. Thank you for your time and thank you for allowing me to speak.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area.
7/21/2022	Oral at Public Hearing	Joe Compian	La Marque Councilmember District B	Thank you, Joe Compian also Councilmember District B in the city of La Marque. I'm here today to oppose the proposed mitigation method of distribution. The allocations calculation criteria is defective, specifically it's not equitable because it takes all weight to these 4 factors and specifically and particularly oppose giving equal weight to the real and property damage figures in the low and moderate income populations, especially in Galveston County. This formula deprives high or low to moderate income communities such as La Marque, with inequitable share of mitigation funds. It gives equal, furthermore it gives equal weight to real and property damage figures resulting in the value of real estates in higher income communities being considered equally with our property values such as in a smaller annual income community such as La Marque. Finally, it is, also I urge that based upon some of the missteps that have occurred in the past, that when and if a final method of distribution is agreed upon, that we all urge compliance with HUD section 3, job training and contracting opportunities. It is for these reasons that I oppose the proposed mitigation method of distribution plan. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD and the Community Development Block Grant - Mitigation funding program require each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement.

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

7/21/2022	Oral at Public Hearing	Larissa Ramirez	Resident	<p>Hi my name is Larissa Ramirez, I am a League City resident and that's my only affiliation. The reason I'm on this call today is because I have worked several years with the Harvey mitigation funds, firsthand with applicants of that program, contractors of that program and the GLO. And because of that, I hold this particular topic very dear to my heart. Because I've seen every angle, every angle of how these programs work. And I'm here to say that I agree with the method of distribution that is being presented today. And the reason being is because I feel as if this has been properly divided as it should be. For those that are advocating for the City of Houston, it's wonderful that you have that passion such as I but at the end of the day the City of Houston did get funds and they got a substantial amount of funds. And our location although it's in Galveston County is diverse and we work with diverse population, whenever I was working with the program. So, I oppose the statement saying that the GLO is, is, has racists intents or discriminatory intents, only because I've worked with every factor of these programs. So, I appreciate H-GAC and their ability to put something together and conduct the research. And I hope that the GLO still considers a lot of the population in Galveston County. You have Texas City, you have several other, Hitchcock, TX and other underserved communities in Galveston County similar to that of the City of Houston. So, if you know, unfortunately there isn't enough for everybody's drainage to be fixed and I just appreciate that, that we are also being considered.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Thank you for providing insights into the flooding challenges faced by your community.</p>
7/21/2022	Oral at Public Hearing	Sallie Alcorn	Houston City Council Member	<p>I'm Sallie Alcorn, Houston City Council Member and H-GAC board member.</p> <p>When it comes to flooding, it is Houston – the most populous city in the 13-county region – that has borne its undue share of the burden. The 2015 and 2016 floods impacted 26,000 Houston homes. In 2017, Hurricane Harvey flooded nearly 350,000 residences with an estimated \$16 billion in damage.</p> <p>When Congress passed legislation in 2018 to provide funding for Texas and other states affected by disasters, the allocation was based on events in 2015, 2016, and 2017. As is well known, Houston was severely and disproportionately impacted by disasters in all three of these years. Flood mitigation needed in Houston and Harris County was a key factor in determining the amount of federal funding to authorize and send to the state of Texas. I have spoken to several of our federal elected officials and believe me, all of them expected Houston to receive significant funding from this legislation – none intended Houston to be completely left out of the mix.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments along with all other comments we received, including H-GAC's responses and a summary of the comments by locale and category, to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

				<p>The Hurricane Harvey State Mitigation Competition which resulted in Houston receiving ZERO dollars is under a cloud of scrutiny. In March 2022, HUD's Office of Fair Housing and Equal Opportunity concluded that the GLO's process was discriminatory and in noncompliance with Title VI of the Civil Rights Act of 1964 and Section 109 of the Housing and Community Development Act of 1974.</p> <p>And now, with the H-GAC MOD, Houston is again being excluded from funding. This decision by the board was predicated on the fact that Harris County, after originally also being left out of the GLO's statewide competition, was subsequently awarded \$750 million. It's important to note, as of today, we have NO information from Harris County on how it plans to distribute this \$750 million - there is not even a release date for the county's draft MOD. So how can we move forward with H-GAC's MOD without this information?</p> <p>Over the course of this MOD process, H-GAC has received numerous comments in support of Houston receiving an increased share of funding. What do we plan to do with these comments? When people complained to the GLO during its process that Houston wasn't getting funding, they were directed to participate in the public hearing on the draft H-GAC MOD. Basically, the GLO was saying you have another bite at the apple through the council of governments. So here we are.</p> <p>It's important the public knows their comments will be taken seriously and changes to the MOD will be incorporated. I certainly hope we are not just using these hearings as an opportunity to check a box before rubber-stamping the MOD.</p> <p>Early in the MOD process before it was announced Harris County would receive a separate allocation, Houston was anticipated to receive 35% of H-GAC's initial funding. This makes much more sense. In keeping with this logic, Houston deserves at least a 30% share which would be \$148 million. So, I am urging H-GAC to do two things. Delay consideration of the MOD until after the Harris County's MOD is released. Secondly, increase Houston's share of this funding to at least 30%, a more proportional \$148 million. Thank you.</p>	
7/21/2022	Oral at Public Hearing	Stephen Costello	City of Houston, Chief Recovery Officer	<p>Good Evening, thank you for the opportunity to address H-GAC with respect to the proposed Method of Distribution of the CDBG MIT funds. My name is Stephen Costello, here representing the City of Houston as the Chief Recovery Officer. My role as the Chief Recovery Officer is to work with federal and state agencies assisting the city in our recovery efforts. Specifically, FEMA has a mitigation grant funds administrated by Texas Department Division of Emergency Management and HUD's CDBG</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also</p>

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

				<p>MIT funds that are administrated by the General Land Office. I had the opportunity to address the Board on the draft MOD on Board Meeting in February 15th. The following comments I believe are pertinent and my observations may be repetitive, however I believe are noteworthy and includes some current items that have occurred post the February Board Meeting. First, as Councilmember Alcorn has indicated the enabling congressional legislation that created these funds was a direct response to extreme weather-related events that occurred between 2015 and Hurricane Harvey. The City of Houston is the only major metropolitan community in the region impacted by all 3 events. H-GAC method of distribution recommendations omitting the City of Houston from substantial flooding funding just defies logic, and we believe it is totally inequitable. The GLO amended action plan that has provided the \$488 million dollars to H-GAC and the \$750 million dollars to Harris County has yet to be approved by HUD. Further, on March 4th as Councilmember Alcorn has indicated HUD issued a letter finding non-compliant with title 6 in section 109 concerning GLO's design and operation of the Hurricane Harvey State Mitigation Competition Fund, which is exactly where these funds are coming from. Based on GLO's response to HUD, HUD then issued a letter on May 16th, a formal letter of determination of non-compliance. Specifically stating GLO's discrimination of Black and Hispanic residents. The H-GAC Board has penalized all cities within Harris County based on GLO's proposed award of \$750 million dollars to Harris County. Without any knowledge of how the County will distribute these CDBG Mid funds or even if the amended state action plan has been approved by HUD. At the February Board Meeting members of H-GAC's water resources committee publicly stated that the method of distribution would be re-visited based on Harris County's proposed method of distribution, to date Harris County has yet to make that available. Absent the approved state amended action plan, resolution of the discrimination issue and information associated with Harris County's method of distribution, any effort to identify the local H-GAC's method of distribution is premature. Respectfully I ask that the board table this issue at this time. Thank you.</p>	<p>encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. This allocation was approved on March 18, 2022 as part of GLO's State Action Plan Amendment 1. You can find more information on Harris County's program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>
7/21/2022	Oral at Public Hearing	Amy Peck	Houston City Council Member, District A	<p>Good evening my name is Amy Peck, address is City of Houston and I represent District A in Northwest Houston. I am speaking today to oppose the preliminary method of distribution of the \$488 million dollars CDBG Mitigation funding. And I'm advocating for the City of Houston to receive more than the proposed 1.9% of the total. To put this in perspective a little, I have over \$130 million dollars of identified flooding mitigation</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of</p>

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

				<p>projects needed in my district alone. These are just areas that have been pre-engineered and does not even include need and projects on other parts of my district that do not have a cost associated with it. All of the neighborhoods included in this \$130 million dollars are low to moderate income areas and none of this money is included in the city's capital improvement plan. The \$9 million dollars that is being proposed for the City of Houston wouldn't even be enough for one of these needed projects in my district alone. I am aware that Harris County will receive the \$750 million dollars for flooding mitigation but there's no guarantee that any of this money will be appropriated inside the City of Houston. Even if they do spend some of this money inside the City of Houston, it still would not be enough to mitigate significant flooding issues. Houston is going to continue to flood unless we take real measures now. These measures must include a regional solution because the implications of Houston's flooding go far beyond the cities boundaries and this money is part of that solution. We are talking about real people here, lives that could be lost, property that will be lost and the Board has an opportunity right here to make the difference. And I urge the Board to consider the impact that this will have on people when they take this vote. Thank you.</p>	<p>Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>
7/21/2022	Oral at Public Hearing	Charles Goforth	President, Brays Bayou Association	<p>Hi I'm Charles Goforth, I am President of the Brays Bayou Association and we were founded back in 1983 after a series of devastating floods throughout Houston. Sound familiar? Back then there really wasn't many funds appropriated or this kind of avenue to do repairs. So, the Brays Bayou Association advocated for Project Brays. So, through our initial studies that we funded we were able to get Harris County Flood Control District and Army Corps of Engineers to do the \$500 million dollar Project Brays. With that being said, all roads point to Houston. The City of Houston is integral to everything in the Harris, the Houston Galveston Area Council. It is the center of it. We need to have the funds distributed to the areas that need it the most. And what I mean need it the most, our bayous flow more of a east west direction, west to the east, excuse me. Our infrastructure is the oldest infrastructure in the region. Our work base is the driving factor of the region. So, I'm kind of at a loss that we're being left out of the funding. I won't say entirely left out of the funding, but I will concur with Councilmember Alcorn, 35% of the general funds that are coming out of this \$488 million dollars is appropriate. We're not asking for everything, but we need to have a chunk of the appropriate funds. I appreciate your time and once again, all roads lead through Houston. As Houston goes the region goes. Thank you.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>
7/21/2022	Oral at Public	Sylvester "Skip"	Member of Houston	<p>Thank you. I'm with Houston One Voice. Houston One Voice was engaged</p>	<p>Thank you for providing public comment on the Method of Distribution</p>

**Comments and Responses - Houston-Galveston Area Council MOD Public Hearing - July 21, 2022 - Online and at H-GAC Offices, 3555 Timmons Lane, Houston**

	Hearing	Reeder	One Voice	to do a study of the Rufino landfill opportunity. A Rufino landfill was a landfill that had been closed for 40 years. They asked us to review that landfill to determine what could possibly that landfill be used for. All of our members of our community said that what we need the most is to protect ourselves from flooding. And looking at Houston One Voice is a nonprofit corporation that partners with the University of Houston and the research universities and detention basin, landfill was 144 acres. 2500 acre feet of detention space and 800 million gallons of storage water. Right now, the only thing that is keeping us from doing that is money. I want you to know who I'm talking to. I am speaking to our neighbors of the 13 counties. I want you to know that the ability to convert that landfill into a detention basin will save 5,000 homes downstream. We know unequivocally that it will reduce the flooding precipitously downstream. Our study and the ability to do that is going to take money. But more importantly It's going to give you those 12 counties a prototype based on the most economical, the most efficacious approach to turning a landfill of which you have hundreds of. The City of Houston has 15 of them, between 750 acres to 3,000 acres that could be used for landfills in this community. What the study would do and what the conversion of this landfill would do will give you that prototype that we can do all of those the same in your communities where you have hundreds. Today if you establish a landfill you're going to take, most of that landfill will be taken off the tax rolls in perpetuity...	for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.
7/21/2022	Oral at Public Hearing	Naomi Ostfeld	Brays Oak Super Neighborhood Council 38	My name is Naomi Ostfeld... I am here on behalf of the Brays Oak Super Neighborhood Council 36- The Brays Oak Super Neighborhood requests that the H-GAC revise its current MOD provisions, which excludes cities located in Harris County from funding consideration until the reallocation of declined funds. If there are no declined funds Houston and other cities in Harris County will receive 0 dollars from the H-GAC. We all believe these provisions are inconsistent with the intent express and the GLO staff responses in the state action plan amendment 1. If the H-GAC disagrees, then as an alternative the Super Neighborhood requests that the H-GAC wait to submit its MOD plan to the GLO until Harris County publishes its MOD plan and the 2 can be coordinated. In amendment 1 section 5.4.5.4 the GLO states that "funds from the Harris County MOD may be allocated to" Harris County cities and towns located within Harris County and special purposes districts. The GLO wrote MAY, not shall or will or must. The decision regarding who receives an allocation is discretionary with Harris County. The primary concern is that each proposed project must mitigate one of the identifiable risks contained	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The City of Houston's allocation under the conditionally-approved MOD is \$9,232,700. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not

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				under section 5.4.5.1. Therefore, it is possible that none of the cities will receive an allocation. As discussed earlier, the GLO is giving H-GAC \$488,762,000 dollars and Harris County \$750 million for a total of \$1,238,762,000 dollars. In response to received comment in which the commentors stated that Houston will still receive \$0 dollars for its mitigation projects, the GLO staff response included the following “the City of Houston is an eligible entity in both the Harris County mitigation method of distribution and the regional mitigation program where the Houston Galveston Area Council method of distribution.” In response to a Houston City Councilmember the discussed needed drainage projects in her district but does not have any funding for it, the GLO staff included in its response “the GLO encourages the commentor to participate in the public planning meeting and the...”	to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.
7/21/2022	Oral at Public Hearing	David Wheaton	Brays Oak Super Neighborhood Council 38	My name is David Wheaton, I represent Texas Housers. I want to reiterate what a lot of people have said so far today. Which is, I think the H-GAC should modify the method of distribution to give increased funding to Houston, specifically, and also Harris County. Houston and Harris County region make up about 70% of all Black and Hispanic, non-white folks in the Houston Galveston Area Council’s area. So, leaving out Harris County and the City of Houston, would greatly discriminate against Black and Brown Texans in the gulf coast area. I also think that again, Houston has a lot of neighborhoods that have been historically disinvested from and this is where we see a lot of increased flooding when we do have a hurricane season. And so, to ignore these neighborhoods would be a travesty because this billion-dollar program that the federal government gave funds to, specifically laid out that these funds are supposed to go to disinvested communities. And so we are truly missing the point and missing the action of giving these funds to disinvested communities so that they can have better flood resilience when the next storm hits. Those are my thoughts.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your communities.
7/21/2022	Oral at Public Hearing	Gladys House-El	CDC of Freedmen's Town	It is unfortunate that funding is going to the City of Houston and the General Land Office because the City of Houston continues to withhold the necessary funding to assist the disadvantaged communities. And I am just alarmed that the funding, so much funding keeps being allotted to the City of Houston and there are no checks and balances and so forth. And then on the other hand when you look at the general land office, it is extremely racist. On down to the contractors, a handful of contractors that they have selected to do work on the Hurricane Harvey housing deal. And I can attest firsthand to the blatant racism. How they destroy, the contractors destroy your property with impunity and there’s no one to	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community

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				really talk to or complain to. So, you're going to have to ensure H-GAC, that they're going to be contract compliance officers in place, similar to like an ombudsman. Because we need someone to be our voice, because right now the City of Houston and GLO, they are both evil and they ended up suing each other wasting nearly a million of our tax dollars. And still the end result was get in there and provide the services to the persons who are targeted and really need the funding. So I really hope that H-GAC would get with HUD and everyone else who is responsible for this funding to ensure that the racism, the discrimination on both parties will cease. And not continue with impunity and it's like both entities are being rewarded for their injustices against my communities and my businesses and my people. Thank you so much, Peace	Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.
7/21/2022	Oral at Public Hearing	Roy Lira	Houston Super Neighborhood Alliance	My name is Roy Lira, affiliated with the Houston Super Neighborhood Alliance. I'm speaking in favor of delaying and revamping the funds allocation process. As a Houston, as a resident of Houston's East end and vice chair of the Houston Super Neighborhood Alliance I've had the opportunity to speak with and visit other representatives of underserved communities within the City of Houston. Although the GLO published criteria that is intended to serve these residents at greatest risks, once again with the distribution formula these areas will be victims of a process intended to directly help them. Removing Houston from funds distribution creates, will create unintended quality of life and economic consequences that go beyond the City of Houston when we look at the economic impact of cities, of areas of residents that rely on the City of Houston for work. My asks include delay the Board vote until Harris County releases their distribution formula and even after Harris County distribution plan is published, recalculate the amount allocated to Houston that more fairly represents the 30% population within the Eastex area. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.
7/21/2022	Oral at Public Hearing	George Frey	Houston SuperNeighborhood-14	Hello, George Frey from Houston, TX. I had previously commented and asking why the Harris County was omitted from the calculations and was told in a previous meeting that it was a subjective, entirely subjective, decision by the Board. And I just question if it really should be subjective given all the other attempts to make this an objective and quantitative assessment. And to me the easiest action would be to just use these exact same formulas, including Harris County in the mix to see where the proportion would lie. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities

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					therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .
7/21/2022	Oral at Public Hearing	Bridgette Murray	President, Pleasantville Area Super Neighborhood Council	Thank you for the opportunity. My name is Bridgette Murray, I'm also president of the Pleasantville Area Super Neighborhood Council here in Houston, TX, As you all know both the city and Harris County did submit projects for funding for these mitigation dollars and the City of Houston projects were not considered or funded at this time. So, my question is if you all do make a decision to provide funding to the City of Houston, will those projects be considered? Or will we have to go through a re-application process? A project was submitted for our community and I live near the Port of Houston, just 2 miles away and the project was intended to alleviate flooding. In addition, a lot of these port communities are located in the San Jacinto River watershed and yet we received no funds from that particular watershed from any of the flooding issues that have been ongoing for many years. The inequity suffered by these vulnerable populations due to flooding should be elevated for funding. And we all know that the dollars that are being considered here tonight may not cover all of the expenses throughout the City of Houston, but we have many vulnerable communities throughout the City of Houston that deserve funding. And I do appreciate all of the comments from the City Councilmembers and City Representatives here tonight. So, thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.
7/21/2022	Oral at Public Hearing	Danielle Goshen	Policy Specialist/National Wildlife Federation	Thank you, my name is Danielle Goshen and I'm the Policy Specialist/Counsel for National Wildlife Federation in Austin, TX. Thank you for the opportunity to submit these comments. Under H-GAC's proposed Method of Distribution Harris County municipalities and jurisdiction are not eligible to receive distribution from the COG. H-GAC reasons that since Harris County was allocated \$750 million by the GLO and state action plan amendment 1 that it is already receiving its fair share. In order to ensure equitable results however, Harris County, The City of Houston and other municipalities within the county's jurisdiction must not be left out of an allocation. First, under the Hurricane Harvey State Mitigation Competition, Harris County and The City of Houston originally were set to receive 0 funds under the CDBG MIT program. After notice that this would occur, Texas Housers and Northeast Action Collective filed a complaint with HUD alleging a violation of Title 6. Earlier this year HUD agreed with the complainants and found that the GLO's prioritization factors worked to discriminate based on the basis of race	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).  We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .  Regarding the question of using Social Vulnerability Index data, H-GAC

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				<p>and national origin particularly against Black residents in violation of Title 6. After significant political backlash from these events the GLO amended its state action plan to provide that \$750 million dollars to Harris County to distribute. The impetus for providing these funds to Harris County for its own method of distribution was due to the GLO’s discrimination under the Hurricane Harvey State Mitigation Competition, which was always separate from the allocation that the GLO gave to the COGs for their own method of distribution. The 2nd reason is that the COG wished to remove or the 2nd reason that this would produce inequitable results is that if the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition it shouldn’t single out Harris County alone. Nowhere else in the COG's method of distribution does H-GAC remove other entities that receive funding under the Hurricane Harvey State Mitigation Competition from eligibility to receive funds. 3rd removing Harris County and municipalities within its jurisdiction from the method of distribution, removes the most eligible and most diverse region within the COG from eligibility. Doing so would therefore hinder equitable outcomes and could arise to violation of Title 6 as well. Additionally, we need to burn some delays and the method of distribution. So, moving on, the distribution factors used could also be tweaked to better distribute funds equitably across the region. We believe that H-GAC should focus on ensuring the greatest amount of funds for those areas most vulnerable to hazards. So, using different tools like the CDC’s social vulnerability index can be used to as a distribution factor to help identify those areas most vulnerable to hazards. Further using personal and real property damage as a distribution factor may lead to inequitable results by disproportionately providing funds to higher income areas and could eliminate the effect of using low to moderate income populations as a distribution factor. So, we really want to recommend considering either reducing the weight for...</p>	<p>used the Department of Housing and Urban Development’s Low-to-Moderate Income (LMI) population data as an equity factor instead of the Social Vulnerability Index (SVI), because LMI data directly captures areas with low-income households and is available at the Census-Block group-level. Conversely, SVI is a complex factor derived from multiple variables and is unavailable for some entities in the H-GAC region. A fundamental focus of our review of allocation formula and data factors was that they should be straightforward, universally available, and applicable for all entities potentially receiving allocations.</p> <p>Regarding the comment on green and natural infrastructure, the H-GAC Board considered the potential eligible uses for allocations. To allow for the greatest degree of flexibility for our local governments, the Board decided to retain all eligible activities, including natural infrastructure, outlined in the Texas General Land Office’s State Action Plan Amendment 1. We encourage you to work with local entities receiving allocations to prioritize natural and green infrastructure projects in their project proposals.</p>
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## **Attachment 7**

### **Notation of all updates made to the Method of Distribution in response to public comment**

The formal public comment period for the conditionally approved Method of Distribution (MOD) for the Houston-Galveston region ran from July 1 to July 28, 2022. During that time, 83 unique comments were received in writing, email, or by phone, or made at the public hearing. The Houston-Galveston Area Council's (H-GAC) Board of Directors (Board) was provided a summary of those comments as well as a full set of the comments and H-GAC responses.

At their meeting on August 16, 2022, the H-GAC Board considered the weight of public comment in their deliberations over their recommendation for a Final MOD to submit to the Texas General Land Office (GLO). In these discussions, the following revisions were made to the conditionally approved MOD based on public comment:

- 1) Inclusion of Planning-only Projects as Eligible Activities
  - a. In response to public comment about the desirability of planning-only projects for several local governments, the Board added this category as an eligible activity.
  - b. Based on guidance from GLO, the Board further modified the MOD to indicate that planning-only activities were not subject to meeting the Low-to-Moderate Income National Objective.
  - c. Based on additional guidance from GLO, the Board modified the MOD to reflect that GLO may add additional requirements or restrictions to planning-only proposals.
- 2) Revision of Language Regarding State Most Impacted and Distressed (MID) Allocations
  - a. In response to questions from local governments received during public comment, and guidance from GLO, the MOD was modified to remove the restriction on only spending State MID allocations in State MID areas (language requiring Department of Housing and Urban Development (HUD)

MID allocations could only be spent in HUD MID counties and zip codes was retained).

3) Reallocation of Declined Funds to the City of Houston

- a. In response to the Funding Acknowledgement Letters, two local governments indicated they would decline their allocations (City of Manvel and the City of Houston, for a total of \$10,790,000 in declined funds.
- b. Under the reallocation methodology specified in the MOD, Harris County cities and General Law cities in the region were eligible to receive reallocated funds, subject to the \$900,000 minimum allocation threshold. When the allocation formula was re-run for these entities and the declined allocation amount, the result was a reallocation to the City of Houston for \$10,790,000. The City of Houston formally accepted this reallocated amount.

Comments and responses to all comments received during the H-GAC MOD Public Planning Meetings  
and Public Comment period (January/February 2022)

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Responses – February 2022

Date Received	Method of Communications	Name	Role/Title	Comment	Response
1/31/22	Email	Chris Armacost	Mayor City of Hitchcock	I would like to see money allocated to cleaning up bayous. Currently we have one that runs through Hitchcock that has not been cleaned in a long time. There are dead trees laying in the middle of it and houses along the Bayou flooded during Harvey. Also money to dredge the Diversionary canal from Santa Fe through Hitchcock would help with future Hurricanes and rain events. Water almost topped it during Harvey which would have been catastrophic for Hitchcock. Both the Highland Bayou and the Diversionary canal should be looked at if this money is available for us to apply for as it will help the drainage of a few surrounding towns as well.	Thank you for providing feedback. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Flood control and drainage improvements and infrastructure improvements are eligible activities, however, each local government receiving an allocation will need to identify and gain GLO approval for funding.
1/31/22	Email	David Douglas	Flood Plain Manager, Liberty County	Rural counties have a hard time competing with large cities. I suggest that a set aside be developed. Commissioner Billy Combs and his subcommittee have suggested a 9% set aside for other sources of funding. Accordingly, 9 to 10 percent may be a good starting point for a method of distribution.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. In the Method of Distribution approved by the H-GAC Board, allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to support regional and urgent need projects, which also will benefit both urban and rural areas.
2/3/22	Verbal – Public Planning Meeting	Larissa Ramirez	League City Resident	Larissa Ramirez, resident of League City would like to agree with David Johnson's comment that Geography plays a large part.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold.

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Responses – February 2022

Date Received	Method of Communications	Name	Role/Title	Comment	Response
2/3/22	Verbal – Public Planning Meeting Verbal – Public Planning Meeting	Christina Flores	City of Kendleton	<p>Hello Christina Flores, City of Kendleton. First, the H-GAC MOD should not include Harris County or incorporated jurisdictions within Harris County. The primary reason for not including these jurisdictions is that Harris County will receive \$750 million for the development of a MOD specific to Harris County. Including these jurisdictions in both MODs presents an unfair advantage within the region that the other twelve counties are not afforded. Jurisdictions should be in one MOD or the other, but should not be considered for both – this is especially true for the City of Houston. The first MOD set precedent by not including Harris County and communities within so H-GAC should continue that practice. The second flaw exhibited within the presented MOD is the H-GAC set-aside in the amount of \$60 million. We do not believe that establishing set-aside allocations for special projects is in-line with the intent of the CDBG-MIT program. Moreover, it appears that H-GAC is considering a collection of projects which will not meet the CDBG-MIT LMI requirement of allocating 51% to LMI eligible projects. These funds allocated as an H-GAC set-aside would be better served within the region if they were redistributed based on the weighted formulas. The third and final flaw pertains to Real Property Damage from 2002-2019 FEMA disaster data considered for Household, Persona. The Federal CDBG-MIT allocation is based on disaster events that occurred in 2015, 2016, and 2017 (Harvey). The specific allocation of funds to regions for the development of MOD's is only associated to the Hurricane Harvey impacted region. Including data from disaster events that are more than 15 years prior to the events leading to the CDBG-MIT allocation is unfounded. Weighted data included in the H-GAC MOD should only include the associated impacts from the three disaster events years with the premium placed on the impact of Hurricane Harvey.</p>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.</p>
2/3/22	Verbal – Public Planning Meeting	Elaine Morales		I Echo Maddie's comment. Many of us in the community learned about this meeting today.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC</p>

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Responses – February 2022

Date Received	Method of Communications	Name	Role/Title	Comment	Response
					<p>Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.</p>
2/3/22	Verbal – Public Planning Meeting	Christina Flores	City of Kendleton	YES! We learned about this meeting today as well.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.</p>
2/3/22	Email	Keith Downey	Kashmere Gardens Super Neighborhood Council #52 - President	<p>Hello. I am Keith Downey, president of the Kashmere Gardens Super Neighborhood. I speak on behalf of my neighbors today, many of whom have suffered through many devastating floods. Disasters hit lower income marginalized communities the hardest because residents don't have a parachute to recover. Many are denied from receiving FEMA Assistance, they don't have flood insurance and are living paycheck to paycheck. Over a year ago, the City of Houston submitted an application requesting \$94 million in Community Development Block Grant Mitigation funds for improvements to my neighborhood’s aging flood infrastructure. These projects, which include storm sewer improvements and the construction of detention basins, would benefit over 8,000 Kashmere-area residents. Unfortunately, the Texas General Land Office denied this application. Communities such as Kashmere Gardens and</p>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your infrastructure needs with Harris County as they seek public input during the development of their Method of Distribution.</p>

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Responses – February 2022

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				surrounding underserved neighborhood find themselves further and further economically behind other communities that do not have to pray yearly that a severe storm will not arrive. Knowing the reality that its out of their control. I urge the Houston-Galveston Area Council to provide significant funding from its CDBG Mitigation allotment to the City of Houston so projects may be constructed to keep neighborhoods like mine out of harm's way.	
2/3/22	Verbal – Public Planning Meeting	Kevin Thompson	Director of Public Works City of El Campo	I noticed chat was disabled, I would like to know if El Campo, the largest city in Wharton county and is substantially impacted along the flat, low lying gulf coast annually, has been excluded again from the jurisdictional list? If so, Why? Our citizens require representation as well.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.  Allocations are based on a formula using several weighted factors. The MOD developed allocations for local governments. The City of El Campo has not been excluded from the list of jurisdictions that may receive allocations under the MOD. Each government that receives an allocation must subsequently propose projects specific to their allocation to the GLO for review. Additionally, the H-GAC Board of Directors action encourages counties to coordinate or plan projects with their cities.
2/3/22	Email	Jo Walton	Resident of Huntington Village Director of Huntington Village HOA	My name is Jo Walton. I am a resident of Huntington Village and a Director of the Huntington Village HOA. Our subdivision had a flood mitigation project scheduled to begin in April 2019, but the funds were diverted to other projects due to Hurricane Harvey. Every time a heavy rain occurs in our area, the streets in the proposed mitigation area flood.  Over a year ago, the City of Houston applied for \$77 million in Community Development Block Grant Mitigation funds to construct projects to improve drainage infrastructure in the Huntington Village area. This project would have benefited over 9,000 Houston residents, but the Texas General Land Office denied the application.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.  Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you

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				I would like to urge the Houston-Galveston Area Council to provide significant funding from its CDBG Mitigation allotment to the City of Houston so projects may be constructed to keep neighborhoods like mine out of harm's way. On behalf of the residents of Huntington Village, thank you for your consideration.	to share your flood mitigation needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Email	Robert A. Crutchfield	Former Chairman Republican Party Sixth State Senate District of Texas Katy, Texas	Much work has been done on retention ponds in recent years especially in cooperation with developers. I worry that we are creating new problems moving this water. My opinion is we need an increased emphasis on conveyance.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments regarding prioritizing conveyance with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Email	Kimbra Hill	Interim City Manager, City of Sealy	On behalf of the City of Sealy citizens and departments who are heavily impacted by future and past flood events in Austin County, we respectfully urge reconsideration of the Committee's preliminary Method of Distribution. We ask that the City of Sealy be included for the mitigation needed on the same Allen's Creek as Austin County. Allen's Creek runs north and south through the corporate limits of the City of Sealy, and has continuously flooded multiple homes, and our Sealy Police Station. Numerous public safety concerns include previous flooding of patrol vehicles and no access in and out of the police station for emergency response during Allen's Creek flooding. Over 50 homes on Terri Avenue, Kathy Ave, Brookside Ln, Willow St, Tauber, and Rexville Road have flooded in the past. As developers continue to bring plans for residential homes and businesses to the City of Sealy, it is more important than ever to provide immediate mitigation. Financial assistance is urgently	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Regarding the City's conveyance improvements on Allen's Creek, H-GAC staff will continue working with the City on proposing a project for H-GAC Priority Flood Mitigation Project list.

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				needed to supplement Austin County’s mitigation efforts for the Allen’s Creek drainage project. The 2018 Austin County Hazard Mitigation Plan for the H-GAC Region Mitigation Plan includes Action Numbers E1, E2 and E3 for flood mitigation, which is attached for your consideration. Austin County has received grant funds committed to mitigate flooding, but the preliminary engineering and construction planning has not begun due to the complexity of requirements for the Allen’s Creek project. The City of Sealy has not received funding for Allen’s Creek flood mitigation. The City of Sealy, at taxpayer expense, has had previous conversations with a drainage engineer on our Allen’s Creek drainage needs to begin evaluation, but the City requires financial assistance to eliminate undue burden on Sealy’s taxpayers. The MOD Committee’s inclusion of the City of Sealy Allen’s Creek drainage project for consideration of funding would be a responsible investment for regional drainage mitigation for Sealy’s taxpayers.	
2/3/22	Email	Gladys House-El	CDC of Freedmen's Town, Houston	<p>RE: Method of Distribution (MOD) For Areas Heavily Impacted by Flooding, Hurricanes and Other Natural Disasters</p> <p>It is time for serious change and remove discriminatory practices and policies by major quasi- and actual governmental entities against grassroot neighborhoods that already battling gentrification and disparities of every kind.</p> <p>1. Why hasn't H-GAC considered awarding a portion of the \$488 million to heritage Freedman's Town/Fourth Ward, Fifth Ward grassroot entities, Independence Heights grassroot entities, Acres Homes grassroot entities and Pleasantville grassroot entities? Our demographics of all sorts always used to obtain funding that goes to none of our neighborhoods directly, if at all. Time out for exploitation of our neighborhoods. We want at least \$10 million each of the said neighborhoods to take corrective action in doing all possible to prevent or curtail massive flooding in our said</p>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.</p> <p>In response to your enumerated questions and comments: 1) Local governments are the only entities eligible for this funding source; 2) The GLO is the state entity responsible for managing these funds and the MOD</p>

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				<p>areas.</p> <p>2. Who decided to include Texas General Land Office in this deal? It cannot handle Hurricane Harvey home rehabilitations; GLO and the clueless city of Houston fought each other in court using at minimum \$700,000 of our tax dollars to merely agree to rehab homes impacted by hurricanes. GLO and city of Houston always under some investigation when give millions of our tax dollars. So who and why is GLO's name even mentioned in this conversation?</p> <p>3. We request set-aside of \$100 million of the \$488 million to go directly to our said neighborhoods and united grassroot organizations therein to produce and/or implement our plans for the intended purposes of the said funding. The balance may be squandered between the city of Houston and Harris County, but do not include Texas GLO. We look forward to hearing from you soon. Thank you.</p>	development process in Texas; and 3) The MOD cannot allocate funding to non-governmental organizations.
2/3/22	Email	Brian Moran	Assistant City Manager City of Baytown	<u>Please see attached correspondence</u>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.</p>
2/3/22	Email	Melissa Peña	Program Director of	Thank you for the summary and information on the upcoming MOD being prepared by H-GAC for GLO on the	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-

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			Capital Projects City of Rosenberg, Texas 77471	\$488 million dollar allocation for mitigation projects. Rosenberg is grateful for any consideration for MOD distributions. As a City located in a Hurricane Harvey HUD Most Impacted County, and as we are a 51% or greater LMI City, we can quickly make use of available funds for mitigation efforts. Your consideration is much appreciated!	GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Keith Downey	Kashmere Gardens Super Neighborhood Council #52 - President	Hello. I am Keith Downey, president of the Kashmere Gardens Super Neighborhood. I speak on behalf of my neighbors today, many of whom have suffered through many devastating floods. Disasters hit lower income marginalized communities the hardest because residents don't have a parachute to recover. Many are denied from receiving FEMA Assistance, they don't have flood insurance and are living paycheck to paycheck. Over a year ago, the City of Houston submitted an application requesting \$94 million in Community Development Block Grant Mitigation funds for improvements to my neighborhood's aging flood infrastructure. These projects, which include storm sewer improvements and the construction of detention basins, would benefit over 8,000 Kashmere-area residents. Unfortunately, the Texas General Land Office denied this application. Communities such as Kashmere Gardens and surrounding underserved neighborhood find themselves further and further economically behind other communities that do not have to pray yearly that a severe storm will not arrive. Knowing the reality that its out of their control. I urge the Houston-Galveston Area Council to provide significant funding from its CDBG Mitigation allotment to the City of Houston so projects may be constructed to keep neighborhoods like mine out of harm's way. Thank you for allowing me to speak before you this morning.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your infrastructure needs with Harris County as they seek public input during the development of their Method of Distribution.

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2/3/22	Verbal – Public Planning Meeting	Sylvester Reeder	Co-Founder of Houston One Voice	Good morning Jeff very good presentation, thank you good to see you again I'm Sylvester Skip Reeder. Co founder with Mike Burcu of Houston one voice. We were engaged by TIRZ 20 to do a study of the Ruffino landfill conversion to a detention basin. And also redevelopment of that property surrounding it. We have since, through the city, asked the state- the TCEQ - to review that study. We found that TCEQ has determined its household waste and not hazardous waste. We're going to present to TCEQ a Title 9 request in the very near future. What we do understand in conversations and coordination with Harris county flood control is that this 140 hundred and 150 acres of detention is imperative to reducing the flood of 25 to 5000 homes downstream of the Brays Bayou. And, we believe that this is also one of the most crucial projects in our Community, to save that because we done the study and we know what we can do. There is also another piece of property 150 acres downstream, that is the same size same character that will also save the flooding some 2500 to 5000 homes downstream. I don't know how we make that much more known, you have a copy of the study, and if you don't you can pull it up on HoustonOneVoice.org. And it gives you the consensus of the Community, the size of the Community, the demographics of that Community. And I hope that will help. Thank you.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges facing your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your flood detention project needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Mary Fontenot	Pleasantville Neighborhood	My name is Mary Fontenot and before I go any further, I will state that my colleague Bridget Murray will Pleasantville area of Houston. I'm speaking today on behalf of my neighbors, many of whom have experienced devastating flooding in the past. Over a year ago, the city of Houston applied for \$98 million and Community development block grant mitigation funds to construct projects aimed at improving drainage infrastructure and the port area we are port community. These projects would benefit over 70,000 Houston residents in my area, sadly, the Texas General Land Office denied this application. I live in historic neighborhoods, which means the drainage infrastructure that was constructed years ago	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must

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				has deteriorated. Even as bayous and major channels are wiping the water cooling in my neighborhood can't find its way out. I urge the Houston-Galveston Area Council to provide significant funding from its CDBG mitigation allotment to the city of Houston so projects may be constructed to keep neighborhoods like mine and others out of harm's way, thank you.	develop its own Method of Distribution for these funds. We encourage you to share your infrastructure project needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	David Johnson	Citizen of League City H-GAC Regional Flood Management Committee Dickinson Bayou Watershed Steering Team	Good morning, thank you for this opportunity and the information that you have provided. A comment I would have was back to the LMI... Oh, let me address myself, my name is David Johnson, I am a citizen of League City do serve on a H-GAC flood mitigation committee I'm also a member of the Dickinson Bayou watershed steering team, I would, I would like to make comment regarding the LMI requirement for projects. Doing flood work in our area has identified the fact that geography does play a very important part in flooding and how to mitigate neighborhoods that can contain significant LMI people. So from looking at the projects we don't have the ability to move forward to help an area just due to the geography and the flow of water. This is both water flowing from the creeks and it's also in a thought process if you do build detention, or what have you in an area, you still have to build connectivity to get that water back out. So geography, is very important role, and unfortunately we don't get to determine where the water comes from in these storms. So anyhow, some consideration for lower LMI for some projects would be appreciated, thank you.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.  The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold.
2/3/22	Verbal – Public Planning Meeting	Andrew Isbell	Walker County	Okay, so I got a few comments, one is going back to a comment that the Commissioner made earlier. When you're looking at metrics for the MOD I think a valuable metric 's not fully represented in the current list would be median household income of the Community. I know you're looking at low to moderate as the metric that's used by HUD and then of course by GLO but the data... it's a data set that exists...is published every year, tak has all the data on their website, it's easy to access and it's certainly a factor in	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.

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				<p>resiliency and recovery. So second, I'd like consideration given to, not necessarily opposed to, but like consideration given to, the direct allocation made to Harris County and the impact of that direct allocation on other Harris County communities, when the method of distribution is developed. Third, the eligible projects. I think that one of the things that needs to be considered, I know that studies for future projects is not something that we really want to include and it's not something that's wanted, including by the State and HUD but one of the things I think we can look at is small scale pre firm developments. Regulatory studies for those I'm going to say regulatory studies to a jurisdictions in new development and old subdivisions. Those areas produce new construction, especially in Zone A's, and without updated data for those communities you end up running in a hamster wheel on having new construction build without good data, And then having claims filed later on and then having to raise houses and future grant cycles and those kinds of things, so I think those are direct impacts on new construction and regulatory programs. Those are not, you know, pushing stuff off for us, you know, a general drain and study for projects in the future, I, like those types of projects to be considered for eligibility. Fourth, the population is being considered as far as the population in the floodplain but considering mitigation of future damages in the recovery from future floods, I would like the region to consider, in the method distribution, the land area in the floodplain. Try to find metrics related to land during the floodplain and the 500-year flood plain and potential for development of those land areas, based on growth. Those metrics are a little harder, but I think they're there because when you don't have good projects in areas where you have new growth occurring that's the cheapest place where you can do projects to stop future damages and future issues. That's the comments that I had for today.</p>	<p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. The Board-approved preliminary MOD does not include a request to expand the list of eligible activities such as planning.</p>
2/3/22	Verbal – Public Planning Meeting	Mary Fontenot	Pleasantville Neighborhood	<p>As you guys are moving forward and hopefully we will be about expediting you know the process as quickly as possible. I'll say another reason why there's a huge concern</p>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC</p>

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				FEMA will be raising its rates insurance rates right? So one of the requirements, a lot of times with you know, being able to afford flood insurance so that your home won't flood. You should be able to afford it, but my understanding is beginning this year insurance companies are raising that amount possibly three times as much as what residents or homeowners were originally paying. That is huge. Which means a lot of Homeowners aren't going to be able to afford it. Getting this done; getting the mitigation of the flooding that happens throughout Houston Harris County is crucial. And we're getting ready to go right into hurricane season we've got to get this done as quickly as possible, and I would suggest that you guys do have on your radar the raising of fees for flood insurance.	Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Brian Moran	Assistant City Manager City of Baytown	Hello everyone, this is Brian Moran representing the City of Baytown. I do want to say that we are excited about the opportunity about potentially receiving allocation for taking the extra steps to mitigate any future on disasters for our Community. I do have a quick comment, just to state that we believe the money, the \$488 million in the H-GAC MOD would best be served if it's directly contributed to cities in the region, thank you.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD does not include an allocation to Harris County or to cities (or portions thereof) within Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Bridgette Murray	Pleasantville Area Super Neighborhood Council and Achieving Community Tasks Successfully	Good morning, and much of what I would want to say has already been shared with you all, but I would like to highlight a few things. Inequity in flood protection is continued as long as FEMA requires the cost benefit analysis be met, because it continually leaves communities like ours behind. Yet individuals with little to no recovery resilience continually suffer from recurring disasters. So, for example, we recently (and I'm sorry, I'm with the Pleasantville Area Super Neighborhood Council as well as with a nonprofit	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.

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				organization Achieving Community Tasks Successfully) and in ACTS, which is our acronym, we actually completed a disaster recovery resilience survey in June of 2021 looking at zip code 77029, which is about two miles from the administrative offices of Port Houston, and unfortunately 60% of the individuals that were surveyed stated that they still have not fully recovered from either Hurricane Harvey are the Yuri freeze. So, as you can see, individuals in these areas. They don't have, as Keith mentioned, the poverty level not having the dollars to be able to just pay for these repairs over and over. So it is very important to all of us that your organization consider how dollars that we could not get from the state, that were that were allocated for the disaster here in the city of Houston Harris county area, that they. be used to and even look at some of the shovel ready projects that the city of Houston identified when they submitted their proposals to the GLO. So we do need the assistance. Our neighbors are always battered during these disasters, because the expectation is they're the last in line, and it's unfortunate that that is the story that is repeated over and over. Thank you.	Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Andrew Isbell	Walker County	Sorry, I missed one, so one additional comment is if LMI is going to be considered, both in the method of distribution and then again as a criteria for reporting, maybe some consideration be given for communities that receive higher funding based on LM I that they also look at increasing the LMI on their project. I'm not you know I just consideration be given. I'm not saying one way or the other. I'm just saying I think it's something worth discussing as part of the process.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold. Each local government receiving an allocation will work with the GLO to identify and approve projects for funding. GLO will be responsible for LMI tracking and reporting.
2/3/22	Verbal – Public Planning Meeting	Tanya Debose	Community of Independence Heights	So I wanted to ditto what Bridget Murray said, as well as Mary Fontenot, I am in the Community of Independent Heights where we flood very often. Over 90% of our Community is in a flood zone, and so I would hope that	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on

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				whatever funds are being distributed, they would be distributed in an equitable manner and that you all would consider the people at the very, very local level to be able to speak and share what they're going through so that it might inform your decision about how these funds are being used And we will have several people who will be getting on, so thank you very much, but I want to go on record, making sure you understand, we ditto all those with Mary and Bridgette said. Thank you.	February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Mardie Page	Super Neighborhood President Independence Heights Number 13	My name is Mardie Page, and I'm the Super Neighborhood president of Independence Heights Number 13. And just as comment, we indeed need the Community development block grant mitigation fund. Little White Oak Bayou has had a tremendously devastating effect on our Community, and we have struggled for over 20-30 years with the problem of flooding. We believe that the problem and little oak bayou, is caused by poorly constructed water flow projects that should have been corrected years ago. I lived in Independence Heights for over 65 years and 46 years those years I have been involved in Community development. Standing here today in the spot as a resident and standing for the residents of Independent Heights it is our belief that funding to be released from indication of flood control for little oak and the surrounding areas and independent heights. I heard about the portion about the buyout portion However, we are asking that our residents not be displaced, and if displacement is absolutely necessary that we will have ample funding allocated for the move according to today's standards of living which are way above the market value of the homes in that area. Most of the homes in that area are historic value, and I don't think they should be replaced by bike trails running and walking trails either, So it is our consensus in independent highs that mitigation that has taken place in South Houston like the Braeswood project and the South Scott Street project would greatly decrease the	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.

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				flooding issues in Independent Heights. and I would like to thank you again for listening.	
2/3/22	Verbal – Public Planning Meeting	David Wheaton	Texas Housers	Hi my name is David Wheaton. I work for Texas Housers that has a huge office in Houston Texas. And I just wanted to say that, we would really like if there were specific measures put in there, so that, since the city of Houston has not received a direct allocation, that black and brown neighborhoods within the city of Houston, be able to get access to this mitigation money for storm water drainage infrastructure and flood infrastructure. There are neighborhoods within the city of Houston that desperately need this mitigation funding, and so making sure that there are measures put in place so that these neighborhoods in these communities are able to have mitigation when the next storm or hurricane does come Also, I would like to comment to make sure that there are measures in place to make sure that cities and municipalities are held accountable to make sure that they do meet the 50% threshold. That there is some kind of way that the [H-GAC] can cities clawback money if municipalities or , do not meet that threshold when they are given money, and that is my comment thanks.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.</p> <p>The MOD will not identify specific projects in advance for governments receiving allocations. Each local government receiving an allocation will work directly with the GLO to identify and approve projects for funding. The GLO will monitor LMI thresholds.</p>
2/3/22	Verbal – Public Planning Meeting	Sandra Vrablec	City of Sealy	You know, I just wanted to mention that there are cities that sustained significant impact during Harvey and to experience flooding and drainage problems that were worsened by Harvey but also still have an ongoing need of funds for mitigation that may not qualify based on proposed objective factors. Again, we have an immediate need, on behalf of the city Sealy citizens and departments, who are impacted by Harvey. We respectfully urge reconsideration of the committee's method of distribution formula and objective factors and to include emergency response as a considered factor. We did identify these issues in our 2018 hazard mitigation action plan in are still seeking ways to fund mitigation. We spent taxpayer dollars to have engineers have conversations about this mitigation, but we still need	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Emergency response is an ineligible activity. The Board-approved preliminary MOD does not include a request to expand the list of eligible activities.</p>

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				financial assistance in order to eliminate undue financial burden to our taxpayers. inclusion would be a responsible investment for regional drainage mitigation, so that we can be responsive, not just reactive to future conditions.	
2/3/22	Verbal – Public Planning Meeting	Danielle Goshen	National Wildlife Federation	My name is Danielle Goshen I am representing National Wildlife Federation. So, first I want to thank you for the opportunity to make these comments and answer questions today. But I am very concerned about the comment that you are looking at potentially reducing LMI to 44%. If there's a reason why eligible entities can't meet the 50% of LMI threshold then only after that reality comes to fruition should the COG request a waiver for that. Second, solely looking at FEMA assistance in population and floodplain, we don't think will achieve equitable results. We believe that these funds should help the most amount of people exposed to the greatest amount of risk and who are the most vulnerable to these risks. And therefore, using different calculations, like the social vulnerability index or ej screen tools may allow [H-GAC] more equitably distribute these funds to eligible entities. We also think that there should be a set aside for natural and hybrid infrastructure projects. Natural and green infrastructure projects were heavily encouraged for use by for CDBG funds by HUD. However, we saw that at least in the hurricane Harvey state allocation or the state mitigation competitions out of 81 projects that were initially chosen by the GLO only one really had a nature based component. So we really see that there is more of a need to encourage entities to put forth green nature based projects that can have benefits year round, including improving air and water quality, mitigating urban heat island effect, and providing much needed recreational spaces. So thank you for the opportunity to provide these comments, we will be submitting additional ones via email.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; and disaster data years that are limited to 2015-2019. The Board-approved preliminary MOD objective factors are Disaster Damage (25%), Households Impacted (25%), Low-to-Moderate Income Population (25%), and Population in the Floodplain (25%). Natural and green infrastructure projects are eligible activities for projects developed by local governments receiving allocations from this funding source.
2/3/22	Verbal – Public Planning Meeting	Kathy Lynch Gunter	Houston Gardens Super	Hello again Kathy Lynch Gunter from Houston Gardens area of Houston Texas also part of the super neighborhood of 48 area as well. I'm asking that the GLO... first of all, there was a study done by the Rice Professor Jim Blackburn that was	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on

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			Neighborhood 48	done in the northeast area we were one of the areas that was hardest hit, and one of the areas that received the least to no funding. I'm asking that the requirements change for jurisdictions before the finding is release so they can have some type of plan in place to make sure that the funding reaches the affected areas. But it's just like giving money to a baby and say baby take that over to your mother. The baby may not get to the momma. So and that's just an illustration that I try to use to simplify some of the conditions that our neighborhood stays in year after year, ever since before Harvey even Allison. So when, after the study was done, we realized that none of the funding makes it to that community, and so this is one of the requirements that I think the GLO should require from jurisdictions and it would help to follow the money; follow the plan. Thank you.	February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.
2/3/22	Verbal – Public Planning Meeting	Jackie Mayhorn	Resident	Jeff this is Jackie Mayhorn. I just wanted to make a comment, I just want to piggyback on what Kathy Gunter was talking about. We do have a equity proposal that was completed by Jim Blackburn, and this is for the whole northeast area of Houston. So, it covers a wide range of inequity that has gone on too long in this city and county. And we're working with Harris county flood control district, but we are needing serious projects along Halls and Greens Bayous that hopefully we can apply for funding. I mean this is from Greenspoint to Northline to Pleasantville, Fifth Ward, Kashmere Gardens, all your historical, you know, black and brown areas. So, we definitely want to be very conscious of the money's and the funding, then you guys have, but it needs to be equity in the process, and it has not been. So even bond monies. Everything is no equity. Our homes may not have cost as much as some other homes in the area, but it's our homes and it's valuable to us, and so I think we'll meet a lot of the threshold at 51% or whatever that your guys are setting, but just want you to be aware of that proposal is if it needs to go to somebody we can definitely forward it on to them. It is actually done, and from that	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.

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				proposal, we will have a plan for Northeast Houston flood mitigation.	
2/3/22	Verbal – Public Planning Meeting	Vicky Martin	Super Neighborhood 4950 Northeast Houston	Good afternoon, and thank you again for allowing me the opportunity, I want to also piggyback on what miss Kathy Gunter and Miss Jackie Mayhorn said. I represent Super Neighborhood 4950 Northeast Houston area and we continue to not have the equity, we continue to fall outside of a donut when it comes to funding for our communities. And we were hardest hit for Harvey. We're still trying to recover, and if we had the funding it will give us a better chance to make homeowners improve their homes and get back to some type of habitable status. So we too would like to see the benefit of having our areas recognized to receive the funding and I yield back, thank you.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community needs with Harris County as they seek public input during the development of their Method of Distribution.</p>
2/3/22	Verbal – Public Planning Meeting	Joetta Stevenson	President Greater Fifth Ward Super Neighborhood	My name is Joetta Stevenson and I am on this call basically representing my neighbors, as the President of the Greater Fifth Ward Super Neighborhood. Over a year ago, the city of Houston had submitted an application requesting \$100 million in Community Development Block Grant mitigation funds. And those funds were to construct some drainage improvements in my area. And I recall that those projects would ...I know they're going to benefit thousands and thousands of Houston residents inside Fifth Ward and also around Fifth Ward area, and the very entity that's all over your slides the Texas General Land office (GLO), they denied that application. Because I don't know what it is that they can't understand that communities like Fifth Ward, many of them were speaking earlier, we normally suffer from not getting the appropriate attention and them taking the appropriate actions to help us. I'm urging the Houston-Galveston Area Council to please provide significant funding from a CBDG mitigation allotment to the city of Houston to these projects, so that they can be constructed in areas like Fifth Ward and Houston Gardens and many of the other	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your community drainage needs with Harris County as they seek public input during the development of their Method of Distribution.</p>

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				areas that were on this call, because we are tired of being left out and we're and basically we are tired of being in harm's way. So thank you that's pretty much all I have to say.	
2/3/22	Verbal – Public Planning Meeting	Sallie Alcorn	City of Houston Council Member	Thank you Jeff, and I just want to say, thanks to all the people who listened to this presentation. I am on the Water Resources Committee of Houston-Galveston Area Council and really appreciate people's questions and comments today and we will all take those under advisement and agree with many of the speakers that Houston was left out of the GLO's allocation of CDBG mitigation funds and certainly want to see significant funding for the city of Houston who was affected quite significantly during hurricane Harvey. So thank you to everyone who showed up to listen to the presentation and to voice your comments today, thank you.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your comments with Harris County as they seek public input during the development of their Method of Distribution.</p>
2/3/22	Verbal – Public Planning Meeting	Naomi Ostfeld	Resident	Harris county flood control district, during their Keegan's Bayou flood mitigation project, said that they need 350 acres at 10 feet deep in detention ponds to completely stop the flooding. Ruffino Hills detention pond would provide 135 acres at 10 feet deep, which is more than a third of that total space. The problem was because the flood control district only had \$30 million on the Keegan's Bayou project. At this stage there was insufficient funds to be able to do a Ruffino Hills detention pond. However, like I said it would be a major factor and funding for the Ruffino Hills detention pond basically give maximum bang for the buck, for two reasons, one it would substantially reduce flooding along Keegan's Bayou and Keegan's Bayou does have a lot of lower to moderate income families and businesses. And according to the flood control district, everything that happens, upstream, has a direct effect upon what happens downstream on Brays Bayou. So, consequently, the idea of having 135 acres 10 feet deep of detention pond would substantially reduce the stress for flooding, lower down on Brays Bayou. And even	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share flood mitigation project needs with Harris County as they seek public input during the development of their Method of Distribution.</p>

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				though a tremendous amount of work is being done on Brays Bayou, every gallon has to be accounted for because less than one gallon more upstream has a direct impact upon what happens downstream Brays Bayou according to the flood control district. So Consequently, this could be a major stress reliever if the Ruffino Hills detention pond could be funded, thank you.	
2/3/22	Verbal – Public Planning Meeting	Stephen Costello	Chief Recovery Officer City of Houston	For the audience, my name is Stephen Costello and the chief recovery officer for the city of Houston. What I would like to do is just to comment on the rating or ranking system that you had briefly went over and what the position that the city believes we should be taking. First of all, the funds that came to the State through HUD, which is a \$4.3 billion GLO's initial state action plan segregated the money into basically three parts which was Disaster 2015, Disaster 2016, and then the Harvey competition, and so one of your ranking systems you're weighting systems is going back to as far back as 2002. We think that is contrary to the intent of the legislation and first, if anything, I would limited to 2015 to 2019 that's my personal opinion. Secondly, what I think it is problematic, is that there is an overemphasis on what we would call regional flooding and lack of emphasis on what I would call urban flooding. A lot of the people in the city that flooded actually funded because of the infrastructure's inadequate to deliver the water to the street, so that is a major concern that we have in what we would call the project selection. The third item that I would like to address is we don't agree with a waiver of reducing the 50% threshold for servicing low to mod income areas, and I think what happens is that you'll find that most of the major metropolitan areas, is where we have a significant population of low to moderate income areas, and we think that the metropolitan areas which suffer from a reduction of investment in those communities. In fact, when we submitted projects to the GLO in the first round of competition, we submitted over half a billion dollars in projects that we're all 100% LMI projects. So we believe that	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.</p> <p>The preliminary MOD applies equal weight to the following objective factors: households impacted, personal and real property damage from 2015-19 storms; low-to-moderate income population; and population within the floodplain (floodway, 100-year floodplain and 500-year floodplain. The factors used in H-GAC's allocation formula developing the MOD balance the geographic, hydrologic, and social vulnerabilities of the region.</p> <p>H-GAC and the GLO agree that these urgently needed funds must be made available to the communities in our region as soon as possible. The timely submittal of the preliminary MOD to the GLO provides the most efficient means of making these funds available to the region while also providing meaningful opportunities for public feedback.</p>

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				we would we would suffer from that particular aspect of it. And then lastly, what I would like to say is that I believe that the timeline is rushed a little bit only because of the fact that the staff has taken the position that the \$750 million that the county is doing is going to. show that the unincorporated areas are getting those funding and then there won't be any money coming from the method of distribution from the local COG. What I would rather see is that we wait to see what the county's method of distribution is first. Before the COG decides to make the decisions on funding allocation as well. So those are my salient points I do appreciate everything that the staff does and for the audience to know I've known Jeff for a very, very long time he's about ready to retire. He spent a long time at H-GAC, and we at the city really appreciate all the work his staff and the people at H-GAC do. Thank you for the opportunity to make my comments.	
2/3/22	Verbal – Public Planning Meeting	Dietrich von Biedenfeld	Mayor Pro Tem & HGAC Delegate, City of West Columbia	I echo Christina Flores' insights.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.</p>

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Responses – February 2022

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2/3/22	Verbal – Public Planning Meeting	Madison Sloan	Texas Appleseed	<p>I'd like to just preface my comments by saying this comment period is, I think, completely unreasonable and you know you're presenting this to the public and you're asking us for comments in less than 24 hours, and I don't think that's long enough, and I think you should extend it. I'm also a little concerned by how fast the process is going and, you're presenting this information and you're essentially saying you're going to develop this entire method of distribution and have it approved in a week, 10 days, if you count weekends. You know at this point, the action plan, amendment hasn't even been approved I'm not clear on why this has to go so fast and in a way that I think really excludes the public from making meaningful public comment. I have some further questions you know about some of the factors and the methods. Just a couple of points. One, if you're not telling us how you're weighting the factors and you're essentially not telling us anything about MOD. The weighting is what actually is going to determine the allocations. That weight is important and I understand you are asking for comment on it. You know the FEMA data again it's unclear why those specific years were chosen the FEMA data is flawed. The FEMA data particularly undercounts damages to renters and low income homeowners. So those people are under represented in that data. The FEMA applications themselves are often lower, particularly from small, rural areas. So the FEMA data needs to be adjusted to take into account the underrepresentation particularly of renters and of low and moderate income areas. We appreciate that the HGAC is looking at where people are in the floodplain and where they are in the flood way and those FEMA maps are sometimes quite out of date. We'd asked you to compare that to some of the actual flooding that happened in hurricane Harvey and figure out are those floodplain maps accurate is that where damage is going. The impact of development is also something that should be taken into account, and we'd also oppose a waiver of the low and moderate income requirement. That's the requirements in</p>	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.</p> <p>We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.</p>

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				federal law. 50% is already lower, is already a waiver of the 70% LMI requirement in the CDBG law. I think there are a lot of questions that need to be answered, and the public just need needs more time to understand what's happening and to comment than 24 hours, thank you.	
2/3/22	Verbal – Public Planning Meeting	Patricia Dorsey	Resident	Ruffino could also remove about 2000 structures out of the flood plain! My comment is based on the HCFCF study along Keegans Bayou.	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the flooding challenges faced by your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your flood mitigation project needs with Harris County as they seek public input during the development of their Method of Distribution.</p>
2/4/22	email	Danielle Goshen	National Wildlife Federation	<u>Please see the attached correspondence</u>	<p>Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; and disaster data years that are limited to 2015-2019. The Board-approved Preliminary MOD objective factors are Disaster Damage (25%), Households Impacted (25%), Low-to-Moderate Income Population (25%) and Population in the Floodplain (25%).</p> <p>Natural and green infrastructure projects are eligible activities for projects developed by local governments receiving allocations from this funding source.</p>

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2/4/22	Email	Kevin Thompson	City of El Campo, Public Works Director	El Campo has suffered many devastating natural disasters over the years as many coastal communities have. Floods are a deeply emotional event that tear at the security of your family as well as your property. Life along the gulf coast will always have that threat with tropical down pours and hurricanes. I have a few questions and comments that would help our community understand your methodology. El Campo has been excluded from jurisdictional consideration in the past, being the largest city in Wharton County and also affected by the gulf coasts flat terrain and storms, why is that? The presenter mentioned a minimum \$1 million dollar allocation, is there a maximum? Is there a cap? Is there a list of proposed projects that money is being considered for currently? There was not a mention of that. Will there be a call for projects that would allow El campo to be included? The presenter mentioned that data going back as far as 2002, wouldn't using more recent data within 10 years as opposed to 20 years be more applicable, especially Beta, Harvey and Uri data? Thank you for your time and consideration when you define the method of distribution of allocated funds.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes disaster data years that are limited to 2015-2019 and the inclusion regional projects and proposed allocations. There is no maximum cap for allocations under this MOD. Allocations are based on a formula using several weighted factors. The City of El Campo has not been excluded from the list of jurisdictions that may receive allocations under the MOD. Each government must propose projects specific to their allocation to the GLO for review.
2/4/22	Email	Gwyneth Teves	City of Wharton, Director of Planning & Development	(1)The meeting presenter stated that staff has not created a distribution methodology or jurisdictional allocation summary. And the presentation was done in a manner to request public input for a methodology and allocation summary to be completed, yet an existing version/sample was presented to the <b>HGAC Water Resource Committee</b> on 1/18/2022. <b>(2)</b> Strong consideration should be made to limit the data collection range to the disaster events associated with the CDBG-MIT funding which include 2015, 2016, and Harvey (2017). Going back to 2002 is far outside the range of the intent of the funding. (3) The outreach for the development of the MOD is concerning. The development of this MOD for ~\$488 million, utilized only a single day (2/3) virtual public meeting with three time slots and a comment period that ended the following day (2/4). (4) <b>The H-GAC MOD should not include Harris County or incorporated</b>	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on

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				<b>jurisdictions within Harris County.</b> Harris County will receive \$750 million for the development of a MOD specific to Harris County. Including Harris County in both MODs provides an advantage that the other counties are not afforded.	Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.
2/4/22	Email	Courtney Sladek	City of El Campo, City Manager	Please make a requirement for the counties to coordinate or plan projects with the allocations for the cities whose allocations are rolled into the county's allocation. We were cut out of the last MOD by just \$13k and the County has no plans to use those funds for our part of the County. As the largest city in the county, and as the only city in the county that did not receive a direct allocation in the last round of funding, we are VERY concerned that we'll be cut out again.	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The H-GAC Board of Directors action encourages counties to coordinate or plan projects with their cities who did not receive a direct allocation.
2/4/22	Email	Richard Tramm	City of Montgomery	<u>Please see the attached correspondence that contains the comments for the City of Montgomery related to the H-GAC CDBG-MIT MOD.</u>	Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. The H-GAC Board of Directors approved a Preliminary Method of Distribution (MOD) to submit to the General Land Office for conditional approval. The Board-approved Preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.
2/4/22	Email	Madison Sloan	Texas Appleseed	<u>Please see the attached correspondence</u>	Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.

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2/4/22	Email	Kim L Kitchen	Harris County resident	I'm not sure if this is the right way to put in a request. Right off 518 on Egret Bay Blvd. There are two streets, Barger and Coryell. That little neighborhood has serious flooding. I mean the drainage is uphill. Next to that neighborhood lad sold for major development. Well the Bayou already floods into this neighborhood and unless the county dredged and deepens this bayou, these people not stand a chance. If this is about allocating funds, can you help this little neighborhood?	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you also to share your community drainage needs with Harris County as they seek public input during the development of their Method of Distribution.
2/4/22	Email/Phone Call	Katherine Armstrong	Wharton County resident	Yes my name is Katherine Armstrong I'm from Wharton County I have a concern about my county but in the rural area the people in the rural area are still in need of household things as such as sheetrock installation someone coming in and helping them get their plumbing fixed since the February storms of last year I'm also on the debt team at the American Red Cross and I get all sorts of telephone calls about rent are at today as I speak February 4th of 2022 there's a great need for help in our rural area there are people that are houses are falling down and we still need some help to help the elderly get on their feet as well I've also seen this throughout a 12 counties I work with the debt	Thank you for providing feedback and insights into the challenges of your community. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. These funds can be used to support a variety of eligible activities that mitigate risks from natural disasters impacting the region. They are not for individual household assistance. Each local government receiving an

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				<p>team on the American Red Cross where I do help with fires and there are a lot of people in a lot of the out of those 12 counties that still need help my email address is msbb k a y 1959@yahoo.com telephone number is 979-453-0762 if there's any questions or answers that are needed for me please feel free to contact me but I do have a great concern for the community of Wharton county and the extra counties that are outside of Wharton county which would be 12 counties around surrounding I've been through these counties and I've seen things that other people haven't seen there's a great need for some help in the rural areas and I am praying that someone will help send aid to the rural areas I see the managers our City Mayors they're not concerned about our rural areas and someone needs to be there are some people the churches are some Churches have been distributed funds and they're not distributing those funds in an adequate way I've also contacted the coalition in this area and they're not responding to a whole lot of needs I myself are one of those people that have been out of my house since Harvey I've been struggling but I walk the pace of helping my community get people set in and into homes and I myself am struggling to try to get stuff for my own self it's been a struggle and it's still a struggling to the day I still continue to help so I'm hoping that my email and my phone call reaches somebody and somebody will come out and see what is going on thank you and as I said if you need to talk to me you have an email address and a telephone number Phil please feel free to contact me.</p>	<p>allocation will work with the GLO to identify and approve projects for funding. We recommend working with your local jurisdictions to address the issues you raise.</p>
2/4/22	Email	Janet W. Corte	City of Katy	<p><u>Please see the attached correspondence</u></p>	<p>Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are</p>

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2/4/22	Email	Christina Flores	City of Kendleton	<u>Please see the attached correspondence</u>	<p>Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution. We recognize that the timeline between the first announcement of these public planning meetings on Jan. 26, 2022, and the day of the meetings on Feb. 3, 2022, was expeditious. H-GAC's Citizen Participation Plan was approved by the GLO and meets or exceeds their requirements.</p>
2/4/22	Email	Russell and Beth Graves	Friendswood residents	In the work that we describe observing, it is not clear if these were conveyance / storage projects or strictly storage projects. If any of the work involved conveyance projects, then our concern does hold	<p>Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Conveyance and storage projects as eligible activities, but each local government receiving an allocation is responsible for identifying projects and obtaining GLO approval for projects to be carried out with funding allocation they receive. We recommend working with your local jurisdiction to address the issues you raise.</p>
2/4/22	Email	Kenneth Williams	Vice-President of the Trinity/Houston	I am Kenneth Williams, Vice-President of the Trinity/Houston Gardens Super Neighborhood (48). I speak on behalf of the residents of several neighborhoods in Trinity	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC

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			Gardens Super Neighborhood	Gardens, Houston Gardens, and Kashmere Gardens. These residents have been inundated with flooding events and damage over the last 20 years. Relief from the Federal, State, County, and City has been slow and lacking. Over a year ago, the City of Houston submitted an application requesting \$94 million in Community Development Block Grant Mitigation funds for improvements to my neighborhood's aging flood infrastructure. These projects, which include storm sewer improvements and the construction of detention basins, would benefit over 12,000 to 15,000 residents in these communities. Unfortunately, the Texas General Land Office denied this application. These marginalized communities have been historically underserved and neglected. Historic disinvestment has caused the residents of these neighborhoods to be less resilient and economically challenged to the point of disaster. I urge the Houston-Galveston Area Council to provide significant funding from its CDBG Mitigation allotment to the City of Houston so projects may be constructed to keep neighborhoods like mine out of harm's way.	<p>Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your aging infrastructure needs with Harris County as they seek public input during the development of their Method of Distribution.</p>
2/4/22	Email	Mayor Cole/Joey Hardy	City of Pearland	<p>Since 1997, major storms and hurricanes have caused millions in damages to residences, commercial buildings, public facilities and infrastructure, and private property in the City of Pearland. Hurricane Harvey, alone, impacted residences and public property to the tune of \$28.9 million, mostly due to flood-related causes. As a result of the impacts of these disasters, flood mitigation maintains its status as a major priority in Pearland as we continue to plan for the implementation of strategies to improve our local drainage and stormwater management capacity. Our current 2019-updated Master Drainage Plan contains hundreds of millions in projects that City-led and/or Brazoria Drainage District (No.4) efforts could be used to resolve local problems, but funding is not available. <b>Therefore, the City of Pearland supports HGAC's proposed Method of Distribution (MOD) of LO administered CDBG-MIT "Round 2" funding proposed by the Water Resources Committee at its January 18, 2022</b></p>	<p>Thank you for your comment letter. We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.</p> <p>The Board-approved preliminary MOD includes a waiver request to lower the low-to-moderate income threshold; disaster data years that are limited to 2015-2019; the inclusion regional projects and proposed allocations; and the exclusion of Harris County or to cities (or portions thereof) within Harris County since the County has been allocated \$750,000,000 for which it must develop its own Method of Distribution.</p>

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				<b>meeting, which proposes to provide the City of Pearland with \$11,014,323 in flood mitigation funding.</b> The Pearland community will continue to be involved and invested in regional planning efforts and I look forward to an outcome that can support substantive flood mitigation projects in our city.	
2/4/22	Email/Phone Call	Ralph Rieger	Brays Oaks Management District	The Brays Oaks Management District promotes, develops, encourages, and maintains employment, commerce, transportation, housing, tourism, recreation, arts, entertainment, economic development, safety, and the public welfare within our defined boundary. The Brays Oaks Management District highly encourages H-GAC to consider allocating funds for flood mitigation projects in our area, as it has been heavily impacted by major flood events in the past. The demographics and types of housing developments within our district offer H-GAC the opportunity to employ a concerted and equitable approach to flood mitigation within our community. The Brays Bayou watershed has a drainage area of 127 sq. miles and stretches 21 miles from its source west of Highway 6 to its junction with the Houston Ship Channel. Its primary streams are Brays Bayou, Keegans Bayou, and the Willow Waterhole, all of which are in our district – and underlines the need for CDBG-MIT funding to be allocated to our area. The Brays Oaks Management District strongly supports projects like the Ruffino Hills Development detention, near Keegans Bayou, which could prevent up to 5,000 homes from flooding and would provide the largest detention/retention floodwater control in Southwest Houston. The site sits on a 150-acre landfill and significant resources have already been invested in the Ruffino Hills project – a type IX permit to TCEQ is awaiting approval. If funds are allocated to this project, they will immediately be used to excavate the planned detention area. Our district strongly encourages H-GAC to consider allocating funds to the Ruffino Hills project as it has strong community support, will add to the areas flood resiliency, and will tie into flood mitigation projects the Harris County	Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board’s approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days.  Thank you for providing insights into the challenges of your community. The Board-approved preliminary MOD does not include an allocation to the portions of the City of Houston that are in Harris County. This is because Harris County has been allocated \$750,000,000 and must develop its own Method of Distribution for these funds. We encourage you to share your flood mitigation project comments with Harris County as they seek public input during the development of their Method of Distribution.

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				Flood Control District has planned around the Keegans Bayou watershed. We thank you for your consideration and attention to this matter.	
2/4/22	Phone Call	Didn't want to give name	Property Owner in Prairie View, TX	We have residents in the rural area who are in dire need of assistance with this \$488M. Every significant rain event, they get flooded. They have nowhere to go and are unable to move. They need help. At one point, they had to go in with boats to get them out. Many of these homeowners are elderly. In addition to roads and bridges please consider rural areas that continue to flood at every major rain event. The areas of consideration are Prairie Acres and Prairie Gables in Prairie View, TX.	NOTE: this was a phone call Thank you for providing feedback. (For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution (MOD) for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary MOD it will be made available for additional public comment for a minimum of 15 days. These funds can be used to support a variety of eligible activities that mitigate risks from natural disasters impacting the region. These funds are not for individual household assistance. Each local government receiving an allocation will need to identify and gain GLO approval for individual projects\ . We recommend working with your local jurisdictions to address the issues you raise.
2/4/22	Phone Call	Audrey Sauls	Navasota, TX	Inquiring and in need of assistance to have houses in an area that is considered a flood town (Navasota Grimes County). We would like to assist the people in getting those homes placed.	NOTE: this was a phone call Thank you for providing feedback. As a municipality outside the H-GAC region, Grimes County and its communities are not eligible to be considered for an allocation under the Method of Distribution (MOD) being prepared by the Houston-Galveston Area Council.
2/4/22	Phone Call	Archie Ray Sauls	Sauls Empowerment Community Outreach Center	Sauls Empowerment Community Outreach Center called to make a complaint of the Navasota Grimes County area. We need housing! We do not need money for flooding and for the streets, roads right now. We still have people affected by the storm, the snow, the ice from last year and the year before last. There are still homeless people. We need this funding to go towards housing, affordable homes and to serve the underserved community in the City of Navasota, TX county of Grimes. I have been trying to call and send an email and it keeps shutting me off. So, I am making this public announcement that we need money for housing. We	NOTE: this was a phone call Thank you for providing feedback. Navasota is in Grimes County which is outside of the H-GAC region, Grimes County and its communities are not eligible to be considered for an allocation under the Method of Distribution (MOD) being prepared by the Houston-Galveston Area Council.

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2/4/22	Phone Call	Christina Norse	Galveston County Community in Action	we need housing, rental assistance shelter, shelter assistance, electric utility assistance, as well as food pantry assistance food assistance, and daycare financial assistance.	<p>NOTE: this was a phone call</p> <p>Thank you for providing feedback. For ease of reference your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors Water Resources Committee and the entire H-GAC Board of Directors for their consideration prior to the Board's approval on February 15, 2022, of a Method of Distribution for submittal to the Texas General Land Office (GLO). Once the GLO conditionally approves this preliminary Method of Distribution it will be made available for additional public comment for a minimum of 15 days.</p> <p>These funds can be used to support a variety of eligible activities that mitigate risks from natural disasters impacting the region. These funds are not for individual household assistance. Each local government receiving an allocation will work with the GLO to identify and approve projects for funding. We recommend working with your local jurisdictions to address the issues you raise.</p>

February 4, 2022

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Houston, Texas 77227-2777  
Phone: (713) 627-3200

**Re: Public Comments to H-GAC on COG MOD**

Via email to: [PublicComments@h-gac.com](mailto:PublicComments@h-gac.com)

To Whom It May Concern at H-GAC:

Please accept this document as the written comments of the National Wildlife Federation regarding the Houston-Galveston Area Council's (H-GAC) Method of Distribution (MOD) for \$488,772,000<sup>1</sup> in Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation funds. As always, our organization appreciates the opportunity to provide public comment.

Our comments and recommendations below focus on the allocations, factors to determine allocations, and set asides for nature-based projects.

*1. Do Not Preemptively Request Waiver to Reduce LMI Requirement From 50% to 44%*

We are very concerned about H-GAC's discussion during the February 3, 2022 public meetings to potentially reduce LMI requirements from 50% to 44%. The priority for CDBG-MIT investments should be for funds to flow to areas with the greatest hazard exposure and the greatest vulnerabilities. Areas historically underserved with low levels of protection need to be the first in line for CDBG-MIT funds. HUD's LMI requirement is an important step in ensuring a large portion of federal funds address important needs of communities that need funds most. **If for some reason the 50% LMI requirement cannot be met then only after entities are not able to allocate funds, then should the COG request a waiver – they should not do so preemptively based on a concern that eligible entities won't be able to find projects in areas where it's most needed.**

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<sup>1</sup> Amount is contingent upon United States Department of Housing and Urban Development's (HUD) approval of Amendment 1 of the State of Texas CDBG-MIT State Action Plan.

*2. Ensure That No More Than 10% of H-GAC COG MOD Funds Go to State MID Areas*

HUD requires a minimum of 50% of funds to be spent in HUD most impacted and distressed (MID) areas. HUD MID areas received the greatest amount of damage and should be prioritized for mitigation activities. However, the GLO in their COG MOD Guidelines has indicated that they want nearly 10% of H-GAC's COG MOD funds to go to State identified MID areas. Contrary to those guidelines however, during the February 4, 2022 public meeting H-GAC indicated that a maximum of 50% of funds could go to State MID areas. Because a maximum amount of funds were allocated to the State MID Areas under the Hurricane Harvey State Mitigation Competition, we do not believe that any additional portion should go to State MID areas. **Instead, funds should be distributed according to the allocation scheme determined, with no greater than 10% to State MID areas.**

*3. Distribution Factors Should Focus on Ensuring Equitable Distribution of H-GAC COG MOD Funds to the Greatest Number of People Most Vulnerable to Hazards*

The COG MOD should have the goal of allocating funds to mitigate disasters in areas most at risk due to hazards, and that have the most vulnerable populations. These funds should make the biggest impact for the areas most unable to pay, that are currently provided with the lowest level of protection. Distributing funds in this way will help facilitate equitable outcomes for the use of the H-GAC COG MOD. We believe that the following factors should be added and revised to the proposed factors during the February 3, 2022 meeting:

- **Social Vulnerability Index (SVI)** – As noted in the State Action Plan, “[e]ffectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster.” SVI should be used as a distribution factor to help identify the vulnerability of communities to hazards within an eligible entity. Entities with high SVI scores should be prioritized for distribution of funds under the MOD.
- **FEMA Individual Assistance Housing Data** – The number of FEMA individual assistance claims filed since 2002 as a percentage of eligible entity population can also be used to determine where the greatest impacts from were felt and where H-GAC's COG MOD should focus. We are concerned that the consideration of property damage will inequitably prioritize funds in higher income areas.

*4. Provide a Set Aside For Nature-Based Infrastructure Projects*

Natural and green infrastructure projects were heavily encouraged for the use of CDBG-MIT funds, not just in HUD guidance, but also in the State Action Plan. However, after the allocation of the first round of funds, it is clear that simple encouragement is not enough. Out of the 81 projects that were chosen for funding by the GLO under the first round of Hurricane Harvey funds, it appears as though only one project incorporated natural infrastructure features.

While traditional infrastructure improvement projects are indeed necessary in many areas, these types of projects do not represent the urgent innovation needed to bring Texas up to speed with nature-based flood mitigation techniques – which many federal programs are increasingly moving towards. Green and nature-based projects benefit communities year round, in addition to when it floods by improving air and water quality, mitigating urban heat island effect, and providing much needed recreational spaces. **We strongly urge the H-GAC to go beyond simple encouragement and incentivize natural and nature-based projects through providing scoring criteria points for natural and green infrastructure projects.**

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Our organization is dedicated to an effective and equitable distribution of CDBG-MIT resources. Thank you again for the opportunity to provide these comments.

Sincerely,

Danielle Goshen

**Danielle Goshen**

Policy Specialist/Counsel

National Wildlife Federation

GoshenD@nwf.org

(678) 713-0781



# CITY OF BAYTOWN

BRANDON CAPETILLO, MAYOR

2401 Market Street • P.O. Box 424  
Baytown, Texas 77522-0424  
(281) 420-6550 • (281) 420-7176 Fax

February 3, 2022

## City Council

Laura Alvarado  
District 1

Chris Presley  
District 2

Charles Johnson  
District 3

Heather Betancourth  
District 4

Jacob Powell  
District 5

Mike Lester  
District 6

City Manager  
Rick L. Davis

Water Resource Committee  
Houston-Galveston Area Council

Re: H-GAC CDBG-MIT MOD Public Comments

Please review my comments regarding the Community Development Block Grant – Mitigation (“CDBG-MIT”) Method of Distribution (“MOD”) in the Houston-Galveston Area Council (“H-GAC”).

Like many communities within the region, the City of Baytown was heavily impacted by Hurricane Harvey and worked diligently to recover from this unprecedented disaster. The CDBG-MIT MOD presents an excellent opportunity for communities like ours to mitigate the negative impacts of future disasters on our residents and businesses. As such, I am providing the following comments:

### Hurricane Harvey MOD Should Use Recent Impact Data

The MOD currently proposed by HGAC uses older FEMA disaster data that occurred more than fifteen years before the events leading to the CDBG-MIT allocation. The federal CDBG-MIT allocation is based on disaster events in 2015, 2016, and 2017 (Hurricane Harvey). The specific distribution of funds to regions for the MOD development is only associated with the Hurricane Harvey impacted area. Therefore, weighted data included in the H-GAC MOD should only have the associated impacts from the three disaster events years, with the premium placed on the effects of Hurricane Harvey.

### No H-GAC or Special Project Provisions

I do not believe that establishing set-aside allocations for special projects is in line with the intent of the CDBG-MIT program, significantly if the projects do not contribute to the Low-to-Moderate Income requirements of the MOD. The \$488 million in the H-GAC MOD would be best served distributed directly to cities within the region.

This is an exciting opportunity to potentially receive an additional disbursement of money and take the necessary extra steps to mitigate the impact of future disasters on our community.

Brandon Capetillo  
Mayor  
City of Baytown



February 4, 2022

Water Resource Committee  
Houston-Galveston Area Council

Re: H-GAC CDBG-MIT MOD Public Comments

To Whom It May Concern,

Please allow this letter to serve as an official comment from the City of Montgomery ("City") regarding the Community Development Block Grant – Mitigation ("CDBG-MIT") Method of Distribution ("MOD") in the Houston-Galveston Area Council ("H-GAC").

Like many communities within the region, the City was heavily impacted by Hurricane Harvey and has been working diligently to recover from this unprecedented disaster. The CDBG-MIT MOD presents a great opportunity for communities like ours to mitigate the negative impacts of future disasters on our residents and businesses. As such, the City is providing the following comments:

#### Harris County Communities Should Not Receive H-GAC CDBG-MIT MOD Allocations

The H-GAC MOD should not include Harris County or incorporated jurisdictions within Harris County. The primary reason for not including these jurisdictions is that Harris County will receive \$750 million for the development of a MOD specific to Harris County. Including these jurisdictions in both MODs presents an unfair advantage within the region that the other twelve counties are not afforded. Jurisdictions should be in one MOD or the other, but should not be considered for both – this is especially true for the City of Houston. The first MOD set precedent by not including Harris County and communities within so H-GAC should continue that practice.

#### Hurricane Harvey MOD Should Use Recent Impact Data

The federal CDBG-MIT allocation is based on disaster events that occurred in 2015, 2016, and 2017 (Hurricane Harvey). The specific allocation of funds to regions for the development of the MOD is only associated to the Hurricane Harvey impacted region. Weighted data included in

the H-GAC MOD should only include the associated impacts from the three disaster events years with the premium placed on the impact of Hurricane Harvey.

#### No H-GAC or Special Project Set Asides

We do not believe that establishing set-aside allocations for special projects is in-line with the intent of the CDBG-MIT program - especially if the projects do not contribute to the Low-to-Moderate Income requirements of the MOD. The \$488 million in the H-GAC MOD would be better served distributed to cities and counties within the region.

The City is excited about potentially receiving an allocation and taking extra steps to mitigate the impact of future disasters on our community.

Sincerely,

A handwritten signature in blue ink that reads "Richard Tramm". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Richard Tramm, City Administrator



February 4, 2022

Jeff Taebel  
Director, Community and Environmental Planning  
Houston-Galveston Area Council (H-GAC)  
via email to [PublicComments@h-gac.com](mailto:PublicComments@h-gac.com)

**Texas Appleseed Comments on Development of the H-GAC Method of Distribution for Community Development Block Grant - Mitigation (CDBG-MIT) Regional Mitigation Funds**

Dear Mr. Taebel:

Following please find Texas Appleseed's comments on H-GAC's development of a Method of Distribution (MOD) for CDBG-MIT Regional Mitigation Funds. As we stated at yesterday's 6:00 p.m. Public Hearing, a public comment period of less than 24 hours is unreasonable and denies the public the opportunity to make informed and meaningful comment on the development of a MOD that will distribute - assuming the Department of Housing and Urban Development (HUD) approves proposed Amendment 1 to the State of Texas CDBG-MIT Action Plan - almost half a billion dollars in federal mitigation funding. As HUD has not yet approved Action Plan Amendment 1, neither the lack of a meaningful public comment period nor H-GAC's stated intention to approve a preliminary MOD for submission to GLO within seven days are justified; we request an extension of the public comment period for at least 15 days.

This MOD is not simply another CDBG-DR MOD, it is an allocation of a first-of-its-kind appropriation of mitigation funds with a different purpose and impact than CDBG-DR funds. The process of creating the CDBG-MIT MOD, therefore, should be conducted with more consideration and public input than previous CDBG-DR MODs.

Given the unrealistic amount of time to consider the information H-GAC presented on its MOD process, our comments are incomplete. We also note that stakeholders whose jobs or other responsibilities do not allow them to either write comments or call to make comments before 5:00 p.m. on a weekday are effectively deprived of any opportunity to make considered public comments based on the information presented at the public hearings on February 3, 2022.

Other comments at yesterday's 6:00 p.m. hearing - from both community members and public officials - that they had only learned about the public hearing that day also cast doubt on whether H-GAC's citizen participation plan and outreach complied with GLO MOD guidelines. H-GAC has not posted its Citizen Participation Plan, however, the MOD Guidelines require both outreach to specific groups and populations and clearly contemplate an outreach process that is not limited to one public hearing.

The MOD guidelines state that "the COG must make efforts to bring non-elected members of the community into discussions regarding the MOD", including "housing advocacy organizations, faith-based organizations, and other community groups" and encourage the COG "to consult with local governments and departments including public housing authorities, floodplain administrators, public work departments, emergency managers, local hazard mitigation and city planners, and stormwater management branches. The COG is also encouraged to gather input from river authorities, conservation groups, historical preservation groups and other organizations that may have knowledge about needed mitigation efforts in the community." In addition,

[t]he COG **must** contact and work with local organizations representing protected classes of individuals, as well as organizations interested in fair housing issues, to gain additional perspective on fair housing and civil rights issues in the COG. This exercise should also help the COG understand how the people they represent are affected by natural disasters. **Approaches beyond simple written notification of public hearings are encouraged.** For example, the COG could host a separate meeting with housing advocacy groups active in the region or visit local offices of civil rights groups. The COG could also pursue personal outreach by calling groups individually. (MOD Guidance at 6) (emphasis added)

While we have not seen H-GAC's Citizen Participation Plan or outreach documentation, public hearing comments seemed to indicate that H-GAC's outreach had not met these standards. We request a copy of H-GAC's Citizen Participation Plan and documentation, including the community groups, housing advocacy organizations, faith-based organizations, and civil rights groups the COG reached out to about the MOD process.

We do want to commend H-GAC's conduct of the public hearings themselves and would urge other government entities to adopt these practices, including, but not limited to:

- Virtual hearings that allow stakeholders to participate without having to travel or find transportation, make hearings more accessible for persons with certain disabilities and the elderly, and make participation easier for parents or other persons engaged in childcare. Virtual hearings are particularly important during a pandemic that makes public gatherings high-risk. Persons with disabilities, those who are otherwise high-risk for COVID-19, and persons who interact with high-risk populations would otherwise be excluded from public hearings. Virtual hearings are critically important right now, as the highly contagious Omicron

variant of COVID-19 is straining hospital capacity, and in the case of these particular hearings, because of winter weather conditions.

- While the hearing was available on a web platform, the public could also call in, making the hearing more accessible to persons without internet access or necessary technology.
- H-GAC provided an ASL interpreter and transcript.
- The hearing was translated into Spanish, Vietnamese, and Mandarin without requiring persons who speak those languages to request interpretation.
- H-GAC held three hearings throughout the day, which made the hearings more accessible for persons with different work schedules or other time constraints.

The information presented at the February 3, 2022 public hearings was also inadequate to provide for meaningful public comment. For example, H-GAC did not explain why it chose the years 2002-2019 as the date range for FEMA data. Particularly given the increasing frequency and severity of hurricanes and flood events, 20-year old data is unlikely to be relevant to current risks, and may in fact result in the allocation of funds to projects that do not mitigate the most urgent and critical disaster risks. We also note that these funds can only be used to mitigate risks from “hurricanes, tropical storms and depressions, and flooding”, the impact of different kinds of disasters is irrelevant to the allocation of CDBG-MIT funds for Hurricane Harvey.

We appreciate H-GAC’s recognition that it should use FEMA application data instead of FEMA award data, and that FEMA IHP data may be skewed by higher property values in certain areas, and its inclusion of personal property damage in order to take renters into account. Renters, particularly low-and moderate-income (LMI) renters, are among the populations most vulnerable to natural disasters, and must rely on landlords and developers to repair or rebuild rental housing. Most disaster recovery assistance for rental housing does not go to renters directly, or ends well before rental housing is rebuilt. Between 2006 and 2015, only \$3.05 billion of CDBG-DR grants went to affordable rental housing, while \$13.6 billion went to homeowners. CDBG-DR funding for new affordable rental housing construction took an average of 4.6 years to be expended, and because only 51% of the rebuilt housing has to be affordable to LMI (under 80% of AMI) renters, pre-disaster affordable rental housing is often replaced with less affordable housing - if it is replaced at all. Mitigating the risk to rental housing - particularly affordable rental housing - should be prioritized.

However, FEMA data undercounts damage to both lower-income renters and homeowners. If FEMA inspectors - who are minimally trained - make a subjective assessment that a renter’s personal property was not worth \$2000 or that damages to a home were not worth at least \$8000 or attribute a building’s condition to “deferred maintenance” rather than storm damage - these disaster survivors are not included in FEMA data. Low FEMA damage assessments may not reflect less damage so much as the socioeconomic status of the neighborhood. Lower numbers of FEMA applications may also reflect, for example, lack of access to the internet or Disaster Recovery Centers in rural areas or specific neighborhoods, or high levels of distrust in areas that have experienced multiple disasters with limited or not help from FEMA.

The number of persons in the floodway, 100 year floodplain, and 500 year floodplain is an appropriate indicator of risk and mitigation need; however, H-GAC is not prioritizing flood mitigation, or requiring that projects mitigate the risks to persons in these high-risk areas. Again, we note that these funds can only be used to mitigate risks from “hurricanes, tropical storms and depressions, and flooding.” These CDBG-MIT funds cannot be used to mitigate risks presented by other types of disasters, and must have a demonstrable connection to mitigating flood, hurricane, and tropical storm threats. H-GAC should prioritize projects that meaningfully address these risks.

We strongly oppose any waiver of the CDBG-MIT LMI benefit requirement. Not only are CDBG funds, including CDBG-DR and CDBG-MIT funds statutorily required to benefit LMI persons and communities, they are in many cases the only funds available for disaster recovery and to protect these communities from future risks. For example, FEMA Hazard Mitigation Grant (HMPG) projects must meet a cost-benefit standard that counts property value over people. These grants are more available to, and have historically benefited, higher income communities. FEMA Public Assistance funds, likewise, favor communities with the capacity to apply for and manage complex federal grants, and with money to meet the federal match requirements. These disparities are increased and compounded the history of racial segregation, which has not only depressed property values in communities of color through redlining, ongoing lending discrimination, and the location of environmental hazards, but has been marked by historical disinvestment in infrastructure and public services - including both basic drainage and other infrastructure, and protective infrastructure that would mitigate disaster damage. Projects that benefit LMI and historically disinvested communities should be prioritized, and regional projects must include local projects that ensure these communities can benefit from larger regional or jurisdiction-wide projects.

H-GAC must make the data sets it proposes to use for the preliminary MOD available to the public.

H-GAC must also provide a further explanation for why it chose the three proposed factors and excluded others. The Social Vulnerability Index (SOVI) for example, is widely used - including by the State of Texas in allocating funding to H-GAC - and it is not clear why including that measure in the list of factors would make “checking the math” any more difficult than using the proposed data sets alone. We have the same question about the other factors suggested in the GLO guidance, and about the potential inclusion of other relevant factors. As set out above regarding FEMA data, these factors themselves may not be objective and the MOD process should correct for flaws in the available data.

Because how these factors are weighted will determine the outcome of the MOD, H-GAC should present potential weighting options to the public. Expecting stakeholders to make their own proposals is unrealistic. Nor has H-GAC provided the proposed data sets that stakeholders with the ability to conduct data analysis could use to make this recommendation.

We recommend that jurisdictions who did not receive CDBG-MIT funding from the Round 1 Statewide Grant Competition be prioritized for funding.

H-GAC should inform stakeholders about what will happen if Amendment 1 is not approved. Will H-GAC conduct a second MOD process?

Please don't hesitate to contact us if you have questions or concerns about our comments. We look forward to an extension of the citizen participation process that will fully consider these and other issues and result in a more effective and equitable MOD Process.

Sincerely,

Madison Sloan  
Director of Disaster Recovery and Fair Housing  
Texas Appleseed  
[msloan@texasappleseed.org](mailto:msloan@texasappleseed.org)



# City of Katy



February 4, 2022

Water Resource Committee - Houston-Galveston Area Council

Re: H-GAC CDBG-MIT MOD Public Comments

To Whom It May Concern,

Please allow this letter to serve as an official comment from the City of Katy ("City") regarding the Community Development Block Grant – Mitigation ("CDBG-MIT") Method of Distribution ("MOD") in the Houston-Galveston Area Council ("H-GAC").

Like many communities within the region, the City was heavily impacted by Hurricane Harvey and has been working diligently to recover from this unprecedented disaster. The CDBG-MIT MOD presents a great opportunity for communities like ours to mitigate the negative impacts of future disasters on our residents and businesses. As such, the City is providing the following comments:

## Hurricane Harvey MOD Should Use Recent Impact Data

The federal CDBG-MIT allocation is based on disaster events that occurred in 2015, 2016, and 2017 (Hurricane Harvey). The specific allocation of funds to regions for the development of the MOD is only associated to the Hurricane Harvey impacted region. Weighted data included in the H-GAC MOD should only include the associated impacts from the three disaster events years with the premium placed on the impact of Hurricane Harvey.

## No H-GAC or Special Project Set Asides

We do not believe that establishing set-aside allocations for special projects is in-line with the intent of the CDBG-MIT program - especially if the projects do not contribute to the Low-to-Moderate Income requirements of the MOD. The \$488 million in the H-GAC MOD would be better served distributed to cities and counties within the region.

The City is excited about potentially receiving an allocation and taking extra steps to mitigate the impact of future disasters on our community.

Sincerely,

*Janet W. Corte*

Janet W. Corte

H-GAC Representative

Councilmember - Ward A

City of Katy

**Name:** Christina Flores  
**Assoc.:** City of Kendleton  
**Title:** City Secretary

### **Community Development Block Grant Mitigation Funds - Method of Distribution (MOD)**

*Public Planning Meeting Comments for 2/3/2022*

H-GAC should allocate to impacted jurisdictions, based on an agreed upon weighted formula, \$488.7 million. The draft version attempts to do this, however, there are three (3) major flaws in the draft methodology.

#### **Don't Include Harris County Communities in the MOD**

First, the H-GAC MOD should not include Harris County or incorporated jurisdictions within Harris County. The primary reason for not including these jurisdictions is that Harris County will receive \$750 million for the development of a MOD specific to Harris County. Including these jurisdictions in both MODs presents an unfair advantage within the region that the other twelve counties are not afforded. Jurisdictions should be in one MOD or the other but should not be considered for both – this is especially true for the City of Houston. The first MOD set precedent by not including Harris County and communities within so H-GAC should continue that practice.

#### **No H-GAC Project Set Asides**

The second flaw exhibited within the presented MOD is the H-GAC set-aside in the amount of \$60 million. We do not believe that establishing set-aside allocations for special projects is in-line with the intent of the CDBG-MIT program. Moreover, it appears that H-GAC is considering a collection of projects which will not meet the CDBG-MIT LMI requirement of allocating 51% to LMI eligible projects. These funds allocated as an H-GAC set-aside would be better served within the region if they were redistributed based on the weighted formulas.

#### **Harvey MOD Should Use Harvey Impact Data**

The third and final flaw pertains to the FEMA disaster data considered for Household, Personal and Real Property Damage from 2002-2019. The Federal CDBG-MIT allocation is based on disaster events that occurred in 2015, 2016, and 2017 (Harvey). The specific allocation of funds to regions for the development of MOD's is only associated to the Hurricane Harvey impacted region. Including data from disaster events that are more than 15 years prior to the events leading to the CDBG-MIT allocation is unfounded. Weighted data included in the H-GAC MOD should only include the associated impacts from the three disaster events years with the premium placed on the impact of Hurricane Harvey.

### **Comments/Questions based on Zoom Meetings held 2/3/2022:**

- The HGAC presenter indicated that there is consideration within the methodology and allocation criterion to exclude Harris County and associated jurisdictions within Harris Co. since the County will receive a direct allocation of \$750 million for the development of a MOD specific to Harris County.
- The HGAC presenter stated that staff has not created a distribution methodology or jurisdictional allocation summary. The presentation was done in a manner to request public

input for a methodology and allocation summary to be completed. This is a misleading presentation since the HGAC Staff has already developed a preliminary method of distribution.

- Why was the meeting structured to solicit input on the development of the MOD when an existing version was presented to the HGAC Water Resource Committee on 1/18/2022?
- Minimum amounts of MOD allocations are set at \$1 million. However, this is no reference to a maximum allocation.
  - Will a cap be placed allocations?
- Discussion over the HGAC project “set-aside” allocations centered around how such projects are selected (methodology, ranking, etc.), what the list of projects are, and who is responsible for implementing those projects.
  - Similar to the 1<sup>st</sup> comment above, it appeared that the presenter did not want to disclose the list of projects and stated that they would have to compile the list to share. What needs to be compiled if a list of projects was presented to the HGAC Water Resource Committee on 1/18/2022?
  - It is unclear what the process is for project inclusion. There was no discussion on the methodology, review, and approval. Mention was made about project tiers, but no detailed discussion regarding these tiers followed.
  - The HGAC presenter admitted that the COG has not done a call for projects to be included in the HGAC set-aside. Without a clear methodology it would seem unreasonable for projects to be included in a “set-aside”. Moreover, given the expedited timeline, it would seem that structuring a methodology and call for projects would be too time-consuming to be included with this MOD.
  - The presenter indicated that “set-aside” projects would be allocated to the respective jurisdiction(s) that benefits from the project. However, this needs to be confirmed.
- Discussion regarding the use of FEMA data centered around why data was going back to 2002. Many individuals spoke out against this data collection range and stated that using Harvey data would be most applicable given the purpose of the funding.
  - Strong consideration should be made to limit the FEMA data collection range to the disaster events associated with the CDBG-MIT funding which include 2015, 2016, and Harvey (2017).
- Why are FEMA Flood Hazard Layers being used in the scoring criteria if they are not available in some communities of HGAC? Is Atlas-14 a better criterion given that it is available and replicable?
- Evaluation criteria was discussed at length regarding the LMI category. Given that LMI data sets, as developed by HUD and provided to the State, are largely a composition of generalized census data. As with most national data sets there are flaws. Therefore, including additional evaluation categories to prove “need” could include CDC social vulnerability indexes or other similar widely available and replicable data sets.
- Concern was expressed over the presented timeline for the development of the MOD. Many participants indicated that they were recently made aware of the public planning meetings. Additional concern was directed at the fact that the comment period is ending less than 24-hours from the last public meeting that was held.
  - The outreach for the development of the MOD is concerning. By way of comparison, the 1<sup>st</sup> round of Harvey MOD that was developed in 2018, included three (3) public planning meetings and two (2) public hearings through the entire month of June. They used this time to distribution \$130 million. Conversely, with the development of this

MOD for ~\$488 million (almost 4 times the first round), proposed a single day (2/3) virtual public meeting with three time slots and a comment period that ends the following day (2/4).

- Why does the preliminary draft MOD go to GLO for approval prior to public comment within the region? This does not seem to be the correct order of events. It would appear that proper sequence would be for public comment within the region then submission to GLO for approval.
  - What happens if the public does not like the version that GLO approves? This would seem to delay the process.
  - Also, why would HGAC not want the public to comment before sending the draft to GLO?

Comments and responses to all comments received during the H-GAC MOD Public Hearing and Public  
Comment period (June/July 2022)

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
6/23/2022	Web Portal	Daniella Flanagan	Student	<p>An estimated 15,000 applications were submitted for Harvey Assistance where 1500 are rumored to have been paid out. Please locate those other applications and earmark and release funds for repairs based on updated application notes. Please contact Rev James L Caldwell for a list of 50 Harvey damaged homes that need immediate mold remediation due to prolonged Harvey damage. Support him in becoming a CHODO to allow his organization to create a branch or committee to focus on repair of these homes of #SuperSeniors those 70 + living in squalor due to Hurricane damage. Please do not release grant funding to organizations that do not have solid reputation and a daily presence/office in Fifth Ward such as Baker Ripley or Catholic Charities. Those funds do not effectively reach the community nor are they trusted. Please do not release funds to the developer Fifth Ward CRC. Funds do not get released into the community and the needle does not move forward on affordable housing, sidewalk installation, repair, environmental justice issues (air quality/creosote plume), literacy issues, broadband/WIFI access issues, programs to keep pace with the Houston Tech Hub all with tangential elements to storm recovery and resiliency. Please release fund for a Texas Congregational Disaster Resiliency campaign faith leaders like Pastor Larry Warren, Lady Taylor, and Reverend James L Caldwell could help launch to ensure that faith centers micro to macro in communities of color in Houston are linked into a disaster network and their congregants and neighbors (non-congregants) are canvassed and placed in an District wide alert system. Please release funds to shore up the largest 2 churches with proper infrastructure not in the way of a 500 year flood plain for example to install solar; satellite phones; walkie talkies, high rescue vehicle, MASH/Triage units, temporary housing, MREs, water and water filtration in case we have another Winter Storm Uri Boil Your Water set of issues ...</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for, and is not designated for individual homeowner housing recovery. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
6/29/2022	Email	Debbie Sutherland, CPM	City Manager	<p>It frustrates me, especially as I am on the frontline having to deal with not only the emergencies that occur in our community, but the tsunami of paperwork that follows. Cities have an obligation to save their tax payers' money by securing alternate funding for damages and cleanup from various events. But at the same time, I have to wonder if it is worth it in the end.</p> <p>Time delays are costing cities more money as prices increase, deterioration awaiting funds to be procured, changes in personnel who then have to familiarize themselves with procedures, changes in procedures over time and current staff spending time otherwise spent on other projects filing, refiling, etc. My suggestion is to have a uniform method of distribution for any event. A prorated share of funds available based on damages. Simple and done! During COVID, I have seen cities receive monies that they are having to find ways to spend it while others are struggling. Also, a single portal for submissions, let the agency administering the funding use the dedicated portal. I have 3-4 portals-FEMA, TDEM, US Treasury, and the Governor's for Criminal Justice. All are different and being a small city, we cannot afford dedicated personnel to just handle these submissions. The state now provides assistance, which is great, but there is still a lot of work that falls on city staff.</p> <p>The method of distribution needs to be consistent and the administration of such programs need to be uniform.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects.</p>	None
6/29/2022	Web Portal	Lori An Gobert	Mayor	<p>Wanted to say thank you to H-GAC for its diligent efforts and hard work on a fair and equitable distribution of mitigation money. After Harris County received the \$750 million dollar allocation (60.5% of mitigation funds) the other 12 counties desperately need these remaining funds. Mid size and rural Texas towns have been under funded throughout this process and it is nice to see that H-GAC did not forget about the other 12 counties in the</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the</p>	None

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				region.	Texas General Land Office (GLO).	
6/29/2022	Web Portal	Chuck Rankin	Alderman Place 5 Columbus Texas City Council	Wanted to say thank you to H-GAC for its diligent efforts and hard work on a fair and equitable distribution of mitigation money. After Harris County received the \$750 million dollar allocation (60.5% of mitigation funds) the other 12 counties desperately need these remaining funds. Mid size and rural Texas towns have been under funded throughout this process and it is nice to see that H-GAC did not forget about the other 12 counties in the region.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).	None
6/30/2022	Email	Laurie B. Kincannon	Mayor, City of West Columbia	See Correspondence 1 - 6-30-22-Kincannon Thank you for providing an opportunity for the City of West Columbia - "The First Capitol of the Republic of Texas" to comment on the method of distribution for regional mitigation funds. The city spent considerable monies and staff time preparing our Round 1 application. Our five-million-dollar request scored 76.98 - 1.02 points below the last funded request. (78.00) The city respectfully suggests that H-GAC review the applications previously submitted to the GLO that remain unfunded in Round 1. The time delay incurred by this new distribution is a huge waste of time and money. In addition, the rising cost of construction due to the freeze and COVID-19 could have been avoided. Our cities could have greatly benefitted from a faster response to our citizens' needs.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. Using that flexibility, local governments can choose to pursue eligible activities that may include projects submitted under prior competitive rounds of funding.	None
7/1/2022	Email	Keith Downey	President - Kashmere Gardens Super Neighborhood Council #52	Everyone uses the word equity but few put it into practice. When you deny funding to Harris County you are denying poorer communities to receive the necessary funding within Harris County to be able to recover from a disaster. Lets be honest funds are not spread and shared with poor communities in the way they should be across the board whether the community is urban or rural and there is no difference in larger Municipal counties. Large pools of	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the	None

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				funding are nothing in the ears of residents unless the trickle down affect actually works. Up until now these communities have barely received a drop. No matter the issue. When will someone truly step up and say the buck stops here and begins with me.	Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	
7/5/2022	Email	Gladys House-El	Resident	<p>This serves as my comments on the upcoming July 21, 2022 public hearing 5:30 p.m. to 7:30 p.m. on the \$488 million HUD funding to Houston, Harris County et al.</p> <ol style="list-style-type: none"> <li>1. Who will be the contract compliance officer of these funds once awarded to the City of Houston?</li> <li>2. Legal action between COH and GLO cost taxpayers \$1 million, so how will H-GAC prevent a repeat?</li> <li>3. Only one Moor American among 7 contractors selected but seldom received any work to build and restore houses. How will H-GAC correct this disparity? GLO selected the 7. Injustice abounds when no one in place to monitor these dollars, contract awards and implementation.</li> <li>4. Present policy of GLO contractors destroyed my fences, gate, plants and did not remove tree trunks, and told me, and GLO confirmed boldly, that contractor not responsible for replacing. Damage to my bulk appliances while in the "care" of Tegrity Home Builders damaged but again no corrective action. It took 4 months to get Tegrity back out to correct its defecting/non-conforming work to my home. My storm door never replaced due to damage caused by Tegrity. Rear screen door and bathroom window screen not replaced either. I was out of \$1,000+ that I just did not have and had to really work to recover from Tegrity's damage to my home and property. That said, there was no contract compliance officer, only office staff that was clueless on how to "make" Tegrity comply. I served notice to sue Tegrity and that got them back out.</li> </ol>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Please note, that the MOD does not currently make an allocation to Harris County or its cities. This funding program makes direct allocations to local governments and is not designated for payments to individual homeowners for home repairs. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None

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				<p>5. Moving expenses and storage should be fully paid along side hotel accommodations, and homeowner should be housed at the nearest hotel to her/his home.</p> <p>6. Ombudsman division consisting of grassroots homeowners and other knowledgeable persons should be established to ensure quality treatment and service; respect and full repairs--not destruction of property.</p> <p>This is my comment and I will have more at time of public hearing. Thank you.</p>		
7/6/2022	Web Portal	Carol Horton		<p>1) Funds should be proportioned according to need! Not the humans playing God, overseeing what they can control! 2) Neither Harris County nor cities wholly within Harris County are included in this funding allocation. 3) Houston makes up more than 30% of the region's population and the bulk of the damage. Harris County cities may be eligible for re-allocated funds, if they become available.?????? REALLY???????????? 4) This distribution % is not even close to being fair and SHOULD BE-APPROPRIATED. A natural disaster sees no %. The Council is responsible for the harm repair this disaster caused. Most people don't have the money to pay for repair, and be reimbursed. Please reconsider the distribution. If this happened to you and your family, could you survive?</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None
7/6/2022	Web Portal	Morad Kabiri	City Manager	<p>The City of Friendswood has concerns with the reduced dollar amount presented, as well as the 50% LMI stipulation. Though we have a wide variety of housing stock, we do not have areas of concentrated LMI households. Any possibility of adjusting the stipulations, or allowing the LMI requirements to be met elsewhere within the region; thus freeing up Friendswood's full allocation amount to be utilized in Friendswood? The total funding amount itself is woefully inadequate given the damage sustained within the Clear Creek Watershed.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of</p>	None

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					benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement. We do not know ahead of time what projects will be proposed by entities receiving allocations, which of these projects will be accepted by GLO, or what the LMI percentages of their service areas will be. Therefore, each entity receiving an allocation is required to meet the LMI threshold individually to ensure the MOD as a whole meets the LMI threshold.	
7/6/2022	Email	Carol Horton		<p>This should be re-calculated!</p> <p>1) Funds should be proportioned according to need! Not the humans playing God, overseeing what they can control!</p> <p>2) Neither Harris County nor cities wholly within Harris County are included in this funding allocation.</p> <p>3) Houston makes up more than 30% of the region's population and the bulk of the damage.</p> <p>Harris County cities may be eligible for re-allocated funds, if they become available.?????? REALLY????????????</p> <p>4) This distribution % is not even close to being fair and SHOULD BE-APPROPRIATED.</p> <p>A natural disaster sees no %. The Council is responsible for the harm repair this disaster caused. Most people don't have the money to pay for repair, and be reimbursed. Please reconsider the distribution.</p> <p>If this happened to you and your family, could you survive?</p> <p>Respectfully,</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	

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				Carol		
7/7/2022	Web Portal	Ann Lents		Houston must be given a proportional share of this funding. Harris County rarely deals with damage and infrastructure in the City (apart from required Flood Control District expenditures). By not allocating funding to the City you are omitting a large portion of the region's population. How can this be fair?	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None
7/7/2022	Email	Walker Agnew, Jr		Please ensure that the City of Houston receives \$488M for flood mitigation funding. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None
7/8/2022	Email	Lawrence F. Labanowski		Dear Sir or Madam, I am a City of Houston resident and write to express my disappointment and concern regarding H-GAC's Board's	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region.	None

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				<p>recommendation to the Texas GLO regarding distribution of funds for flood mitigation. In summary, I believe that the City should receive a greater allocation and at least an allocation equal to its proportion of the population. I have read how the Board decided and I respectfully disagree with their position and the basis for it.</p> <p>As you know, the City suffered the greatest damage as a direct result of the flooding suffered in Harvey. That fact, in combination with the already crumbling infrastructure and outdated urban drainage system should compel that the City receive at least a fair allocation of the funds allocated. In consideration of the most vulnerable of our population who live in the Houston City limits and their lack of a voice in this matter, it seems to me that the Board should do the fair thing and vote towards increasing the City's share of those much needed funds.</p> <p>We live in a great City, one which has led the country in so many ways including how it treats its homeless and how its diverse population in relative harmony. I respectfully suggest that it would be a wonderful thing for the Board to reverse course and help the City to help itself by moving a fair share of those funds to be allocated to the City.</p> <p>Thank you. Respectfully submitted, Lawrence F. Labanowski</p>	<p>(For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	
7/9/2022	Web Portal	Neal Ehardt		<p>Please increase Harris County's share of flood mitigation funding from 1.9% to 50%. Houston makes up more than 30% of the region's population and received the bulk of Harvey damage. Flood mitigation is expensive, especially in suburban sprawl. That's why we should focus the flood relief money in dense urban places where this limited money can provide sustainable flood relief for the greatest number of people.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County</p>	None

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					as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	
7/11/2022	Email	Christopher Johnston		It's very concerning that H-GAC's board recommended to the Texas GLO that the city of Houston receive only 1.9% of the \$488 million pool of flood mitigation funding. People inside the city of Houston limits experienced the most damage from Hurricane Harvey and H-GAC's assumption that Harris County receiving significant funding from the GLO means that the city of Houston doesn't need significant funding as well is flawed. Well over 2 million people live in unincorporated Harris County and, with that size of population spread across the county's 1,778 square miles, it's not likely Harris County will have dollars to spare with the city of Houston. Please reconsider your recommendation to exclude the city of Houston from receiving meaningful funding for flood mitigation. H-GAC is supposed to cooperate to solve area wide problems and it seems there is a more equitable manner of distributing these funds than what is currently proposed. Please take the entire region and its residents' unique vulnerability to flooding into consideration when finalizing the recommendations for funding. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None
7/11/2022	Email	Edith H. Johnson		Houston desperately needs funding for floor mitigation projects. Please do not neglect the economic engine of our region.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you	None

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					to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	
7/12/2022	Email	Sylvester L. Reeder III		<p>Houston One Voice (HOV) would like to offer the following public comments on the method of distribution for regional mitigation funds.</p> <p>HOV, a 501C3 Corp, partnered with the University of Houston, other area academic research universities, and an international engineering and architectural construction firm. Our focus is to provide municipalities, Counties and Special Purpose Districts to identify innovative strategies to have successful economic &amp; environmental resilient, sustainable, and implementable projects.</p> <p>The State of Texas has 4500 closed Municipal solid waste landfills. Over 15 are in the Houston Metropolitan Statistical Area primarily located in marginalized communities of color. The landfills are between 50 and 200 acres ,its use is marginal or unusable land. The Texas Gulf Coast members of HGAC are constantly looking for land to retain &amp; detain stormwater. Closed landfills typically, have not been on the tax rolls for 30 to 50 years. The challenge is how to remediate and use this land for retention and detention of storm water while increasing their tax rolls and improving the quality of life.</p> <p>For example, the Ruffino Hills Landfill in Houston Texas, located on the Keegan’s Bayou a major Tributary causes flooding to Brays Bayou. This landfill if remediated can provide a 50% reduction in flooding saving about 5,000 homes. It can also provide additional green space and transformational economic growth to a highly dense</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	None

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				<p>population of underserved Communities.</p> <p>The Houston Southwest area supports this effort. Attached represents a consensus support from HOA's, Civic Clubs, Super Neighborhoods, Management Districts , &amp; TIRZ's representing 250,000 community stakeholders, leaders, businesses &amp; residents. The Ruffino Hill Redevelopment research study, financed by TIRZ20, received the prestigious gold medal award from the Houston Region of the American Planning Association( APA).</p> <p>Ruffino Hills Redevelopment report is an innovative example where landfill remediation and redevelopment can be a model for communities to develop resilient , sustainable and cost effective reduction of Instances of flooding projects.</p> <p>Best Regards,</p> <p>Michael Bercu &amp; Sylvester L. Reeder III</p>		
7/12/2022	Mail	Haywood Mack Ross		<p>See Correspondence 3 - 7-12-22-Ross RE: \$488,762,000 {nearly .5 billion dollars} Final Method of Distribution to the Texas General Land Commission</p> <p>Der Ladies and Gentlemen,</p> <p>On Monday, July 11, 2022 I, Mr. Haywood Mack Ross, visited the offices of the Houston-Galveston Area Council on Timmons Lane responding to a local Wharton paper "Solicitation for Public Comment."</p> <p>Upon arriving at the (H-GAC) office on Timmons I was ignored for a significant amount of time. I noticed a Black</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for and the funding source is not designated for direct assistance to individual residents. The Board</p>	None

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				<p>Lady and a rather large man supposedly working. After a while, a White young man showed up with a necktie on and we went to a separate room and actually talk about nothing. My interest was would a portion of the \$488,762,000 be used for housing which was never definitely addressed and this executive had no business cards; consequently I have no recall of who he is.</p> <p>Frankly, since of course I am Black, I am rather sensitive to the fact we came to no significant conclusion whatsoever making my efforts and expense of no use, and no account.</p> <p>I do hereby request, please, that I be kept informed of all initiatives proposed by the Houston-Galveston Area Council.</p> <p>Your prompt and deliberate cooperation will be immensely and tremendously appreciated.</p> <p>Thank you very much!</p>	<p>considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area.</p>	
7/13/2022	Email	Patricia Dorsey	Board member of Braeburn Valley West Subdivision	<p>To Whom it May Concern:</p> <p>My name is Patricia Dorsey and I am a Board member of Braeburn Valley West Subdivision. I am opposed to H-GAC's 1.9% allotment of the \$488 million toward flood mitigation. Although the City of Houston received other monies, the share of only 1.9% of \$488 million seems quite short-sighted when it comes to the extent of damage the Houston area received and the needed monies to update a failing system. One of the biggest concerns on the west side of Houston comes from the flooding along Brays Bayou watershed. Harris County Flood Control District, in a recent study, suggested that if Ruffino Hills at the corner of Beltway 8/59/West Bellfort, was converted to a multi-use flood detention area could alleviate 2000 structures from flooding downstream. Keegans, which flows into Brays Bayou and is the northern boundary of Ruffino Hills, has overflowed its banks three times: Memorial Day flood,</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced</p>	

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>Tax Day Flood, and Harvey. Thirty-plus homes along Keegans, as well as our neighborhood pool and clubhouse flooded at each of these events. H-GAC should seriously consider the need to get money to this historic, underserved Riceville area, to alleviate the flooding, and Ruffino Hills would be the answer, not just for Riceville, but for Maplewood, Meyerland, Willow Meadows, and further down Braes Bayou into 610 loop homes and structures.</p> <p>I implore you to reconsider and make a positive impact for Southwest Houston now and into the future!</p> <p>Patricia Dorsey BVW-VP Neighborhoods To Trails Southwest Friends of Keegans Bayou Trails and Park District J Patrol Task Team.</p>	by your community.	
7/14/2022	Web Portal	Brenda Garcia		<p>The effects of the last major floods were devastating to Houston residents. Even those with insurance had a terrible time of getting their houses repaired. This left many long-time residents in a catch 22. Seeing as how Houstonians pay their fair share of taxes, it seems only appropriate that those same residents receive proportional funds to help them out in time of need. 1.9% funds based on 30% population (i.e. taxpayers) seems extremely unfair. Thank you for your time.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
					eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	
7/14/2022	Email	Cindy Chapman	President of the Westbury Civic Club	<p>My name is Cindy Chapman, and I am President of the Westbury Civic Club, a community of 5,000 single-family homes located in the southwest area of the City of Houston. I am extremely concerned that H-GAC has recommended that only 1.9% of \$488 million of flood mitigation funds be allocated to projects located within the City of Houston, despite the fact that the bulk of the damage happened in Houston and 30% of the population lives in Houston.</p> <p>My own neighborhood of Westbury has experienced REPEAT FLOODING events. Westbury homes flooded in 2013, 2015, 2016, twice in 2017, and the worst house flooding occurred during Harvey in 2018. Flooding in our Westbury neighborhood during Harvey was severe enough that one of our elementary schools was used as a base for emergency boat and helicopter rescues during Harvey.</p> <p>Why would you purposefully exclude my neighborhood and other Houston neighborhoods from mitigation funding intended to reduce risk of flooding? The City of Houston has several projects planned in the future to reduce risk of flooding in my neighborhood, and similar flooding mitigation projects are being planned across the City of Houston. In my neighborhood, the City of Houston wants to add more stormwater detention, add excess overflow routing, and to replace the existing undersized stormwater drainage system that is more than 60 years old. My neighborhood is one of many in Houston that could</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>benefit from the flood mitigation funds being allocated by H-GAC.</p> <p>I implore you to reconsider the proposed allocation of mitigation funds, so that funds are more fairly distributed to help those who experienced flooding in Houston, where the bulk of the damages were incurred. Houston has both high need and high population.</p> <p>Best regards, Cindy Chapman Westbury Civic Club, President</p>		
7/14/2022	Email	Joel Hardy for Kevin Cole	Grants/Special Projects / Mayor	<p>See Correspondence 2 - 7-14-22-Cole RE: CDBG-MIT "Round 2" Method of Distribution</p> <p>Since 1997, major storms and hurricanes have caused millions in damages to residences, commercial buildings, public facilities and infrastructure, and private property in the City of Pearland. Hurricane Harvey, alone, impacted residences and public property to the tune of \$28.9 million, mostly due to flood-related causes.</p> <p>As a result of the impacts of these disasters, flood mitigation maintains its status as a major priority in Pearland as we continue to plan for the implementation of strategies to improve our local drainage and stormwater management capacity. Our current 2019-updated Master Drainage Plan contains hundreds of millions in projects that City-led and/or Brazoria Drainage District (No . 4) efforts could be used to resolve local problems, but funding is not available.</p> <p>Therefore, the City of Pearland supports HGAC's proposed Method of Distribution (MOD) of GLO administered CDBG-MIT "Round 2" funding proposed by the Water Resources Committee, which proposes to provide the City of</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD requires that cities falling within multiple counties including Harris County may not expend their allocation within the portion of the city within Harris County. The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement. This requirement is specific to this allocation of funds, and is not affected by prior competitive rounds of funding unless otherwise indicated by GLO. The period of performance for these funds is 6 years or as otherwise indicated in the GLO's State Action Plan Amendment 1 (or as may be further amended). The MOD contains a methodology for reallocation of initially-declined funds,</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>Pearland with \$14,008,900. Having said that, there are some key elements of concern that I feel must be clarified and/or instituted as the process moves forward:</p> <p>Appropriation by Jurisdiction: There are 11 cities within the HGAC region that are located in at least two (2) counties, three (3) of which are located in three (3) counties. Pearland being one of these (Brazoria - primary, Fort Bend, and Harris), there is a concern as to whether or not cities like ours will have to allocate funds to projects according to their location by county. There should be clarification included in the process that determines if allocated funds need to be spent according to their appropriation by county.</p> <p>Low-Moderate Income: Due to the preliminary allocation of GLO CDBG-Mitigation funds to certain projects prior to this Method of Distribution, clarification needs to be provided as to the LMI requirements, as that initial allocation may have the impact of adjusting the required LMI percentage on the basis of how those projects impact the overall LMI for the region.</p> <p>Period of Performance: How long will the period of performance be for using these funds?</p> <p>Redistribution of Unspent Funds - Balance of Region: All subrecipients/subawardees may not be able to spend these funds appropriately, if at all. Clarification needs to be provided as to how the MOD will accommodate redistribution of unspent funds to viable, eligible projects elsewhere in the region. This was a major issue in the aftermath of Hurricane Ike.</p> <p>Matching Funds: Clarification needs to be provided on how these funds can be used in concert with other federal and/or local matching funds (ARPA, FEMA, local bonds, etc...).</p>	<p>but was not designed to redistribute unused funds. Additional guidance on the eventual redistribution of unused funds will be developed by GLO. The MOD doe not restrict any eligible use designated in the State Action Plan Amendment 1. The use of matching funds not explicitly covered under that document is subject to further guidance and approval from GLO and/or the funding source to which the match would potentially be applied. The process for administering funds, project proposals and approvals, and reporting after the completion of the MOD will be between each entity and the GLO. H-GAC's continuing role is limited to its administration of the regional priority projects allocation. GLO will make additional guidance on the project proposal and approval phase available after the approval of the MOD. The MOD mirrors the eligibility requirements of the State Action Plan Amendment 1. The LMI requirements for HUD Exception Criteria grantees under the MOD are subject to their existing status.</p>	

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>Administration: Clarification needs to be provided on how the program will be administered. Will these funds be handled entirely by HGAC for its administrative oversight and management program-wide? OR, will the GLO be the administrative agency? Will subrecipient/subaward entities need to submit project applications to secure funds? When will those parameters be made available?</p> <p>Mitigation vs Disaster Recovery: Clarification needs to be provided on the types of projects that are eligible for use of these funds. There are characteristics of a mitigation project vs a disaster recovery project that can make the latter definitively ineligible for consideration.</p> <p>HUD Exception Criteria: Existing HUD Entitlement Jurisdictions that have fewer than one-quarter of their Census block groups with 51% or more low- and moderate-income persons, do not have to meet the area-benefit requirement that 51% or more low-moderate income persons reside in the "service area" of an applicable project. Clarification needs to be made as to how these exception criteria values will be incorporated into the local requirements for these jurisdictions in meeting LMI requirements AND to the extent these have been included in the MOD. The table below shows the HUD Exception Criteria Grantees located in the HGAC region. It may be of note that Sugar Land, prior to its decision to release itself from its Entitlement Jurisdiction status, was one of these entities and may still fall within the technical parameters called for when determining Exception Criteria status if included in this MOD.</p> <p>On behalf of Pearland, I believe these comments and questions are important enough to drive the need for clarification, so our community and others can proceed accordingly when deciding how best to use these funds. The Pearland community will continue to be involved and</p>		

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				invested in regional planning efforts and I look forward to an outcome that can support substantive flood mitigation projects in our city.		
7/14/2022	Web Portal	George Frey		Justin Bower said HGAC board decisions are subjective. There are supposed to be objective scoring criteria for the projects so why also isnt the board required to make objective decisions on allocating funds to counties?	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects.	None
7/16/2022	Email	Carl Christensen		<p>As a resident of a rural community, outside of Houston and Harris county, I would like to remind the committee that our town, Columbus, which is located on Interstate 10, is a major stopping point for Houston area evacuees, during hurricanes.</p> <p>Our local resources are not normally funded to handle the enormous influx of people and vehicles that occur with every major storm. Immense pressure is placed upon our limited community resources, for which local taxpayers fund and rely upon.</p> <p>A large part of these emergency efforts negatively affect the regular commerce and traffic of our area.</p> <p>Without additional funding, the fall back services that Houston and Harris county residents hope to rely upon will</p>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Through the flexibility of eligible uses and the emphasis on regional priorities, local governments are encouraged to work on projects of shared benefit.	None

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				not be available for them in their most dire time of need.		
7/20/2022	Verbal to Justin	John Graziano		<p>I am making these comments on behalf of myself and several hundred area residents who have met and discussed our concerns regarding, among other things, local land decisions and the use of eminent domain. While we generally support appropriate uses for eminent domain for purposes necessary to prevent homes flooding, we oppose the use of eminent domain for recreational projects or the addition of recreation in areas adjacent to private property.</p> <p>I encourage local governments pursuing flood mitigation projects to consider working with Ducks Unlimited or a similar organization to include habitat or other appropriate uses as part of design for detention basins and similar projects, but to exclude recreational elements that may impact surrounding landowners. We also encourage local governments to listen to and appreciate the concerns of rural landowners and agricultural producers in the area, seek to increase their representation in decision-making processes, and approach decision-making with a respect for private property rights. Local landowners are good stewards of the environment and should be left alone to the greatest extent possible.</p> <p>John Graziano, Montgomery County</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	None
7/21/2022	Oral at Public Hearing	Arnetta Bailey	Iowa Colony Council Members?	<p>Well, my name is Arnetta Murray, as you said Councilwoman in Brazoria County, my city is really the city of Iowa Colony. And I just want to make sure that the allocations are being or will be dispersed to the different towns and cities within Brazoria County. I was looking on here and I was hoping that other councilmembers from Brazoria County were here, but it looks like it’s just only me. But the focus is I just want to make sure that Brazoria County as we see the possible allocation. But we just want to make sure that they get the money. As you know when</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes</p>	None

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				the Harvey came and other storms, it's one way in basically one way out and that's 288. When 288 floods, it is horrific. So, I just want to ensure, we have small towns and cities, actually 28 in Brazoria County but the small ones such as Bailey's Prairie, Freeport, Jones Creek, even Brazoria Tx, we want to make sure that the money is given and that I can assure you that it's going to be allocated properly. Because we gotta, we can't forget the rural folks. So, I'm here speaking on behalf of the rural and all of the counties within Brazoria County. I love Harris County, I got parents in Harris County but right now I'm representing and speaking on behalf of Brazoria County. Thank you for your time and thank you for allowing me to speak.	multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area.	
7/21/2022	Oral at Public Hearing	Joe Campian	La Marque Councilmember District B	Thank you, Joe Compian also Councilmember District B in the city of La Marque. I'm here today to oppose the proposed mitigation method of distribution. The allocations calculation criteria is defective, specifically it's not equitable because it takes all weight to these 4 factors and specifically and particularly oppose giving equal weight to the real and property damage figures in the low and moderate income populations, especially in Galveston County. This formula deprives high or low to moderate income communities such as La Marque, with inequitable share of mitigation funds. It gives equal, furthermore it gives equal weight to real and property damage figures resulting in the value of real estates in higher income communities being considered equally with our property values such as in a smaller annual income community such as La Marque. Finally, it is, also I urge that based upon some of the missteps that have occurred in the past, that when and if a final method of distribution is agreed upon, that we all urge compliance with HUD section 3, job training and contracting opportunities. It is for these	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD and the Community Development Block Grant - Mitigation funding program require each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement.	None

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				reasons that I oppose the proposed mitigation method of distribution plan. Thank you.		
7/21/2022	Oral at Public Hearing	Larissa Ramirez	Resident	Hi my name is Larissa Ramirez, I am a League City resident and that's my only affiliation. The reason I'm on this call today is because I have worked several years with the Harvey mitigation funds, firsthand with applicants of that program, contractors of that program and the GLO. And because of that, I hold this particular topic very dear to my heart. Because I've seen every angle, every angle of how these programs work. And I'm here to say that I agree with the method of distribution that is being presented today. And the reason being is because I feel as if this has been properly divided as it should be. For those that are advocating for the City of Houston, it's wonderful that you have that passion such as I but at the end of the day the City of Houston did get funds and they got a substantial amount of funds. And our location although it's in Galveston County is diverse and we work with diverse population, whenever I was working with the program. So, I oppose the statement saying that the GLO is, is, has racists intents or discriminatory intents, only because I've worked with every factor of these programs. So, I appreciate H-GAC and their ability to put something together and conduct the research. And I hope that the GLO still considers a lot of the population in Galveston County. You have Texas City, you have several other, Hitchcock, TX and other underserved communities in Galveston County similar to that of the City of Houston. So, if you know, unfortunately there isn't enough for everybody's drainage to be fixed and I just appreciate that, that we are also being considered.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Thank you for providing insights into the flooding challenges faced by your community.	None
7/21/2022	Web Portal	Doug Beatty		Over 30% of the homes in our neighborhood were damaged during Hurricane Harvey. We have endured through Tropical Storm Allison, the several flood events caused by rainstorms, and Hurricane Ike. We have had physical damage to our property. Because we have a mortgage and we are in a flood-prone area, we must	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to	None

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				purchase flood insurance in case we need to file for compensation for damages. It is without a doubt that Houston area neighborhoods suffered during the above mentioned events and need to fund flood mitigation efforts. Please consider increasing the percentage amount to be allocated for the City of Houston and the City of Bellaire - they certainly need it.	the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). a. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	
7/21/2022	Email	Sylvia Garcia	U.S. House of Representatives, District 29m Texas	<p>See Correspondence 5 7-21-22- Garcia</p> <p>Dear H-GAC Board of Directors,</p> <p>I am glad to have the opportunity to offer my comments on the flow of Community Development Block Grant - Mitigation (CDBG-MIT) funds in Houston. The need for flood relief is a difficult reality for too many Houstonians. I implore the Houston-Galveston Area Council (H-GAC) to allocate a fair and equitable proportion of CD BG-MIT dollars to the City of Houston to offer much-needed assistance to its residents, some who live in my Congressional District.</p> <p>For context, in 2018, Congress appropriated \$12 Billion in CD BG-MIT funds for qualifying disasters from 2015, 2016, and 2017. Hurricane Harvey is one of these qualifying disasters, and the State of Texas received a lump sum of these dollars to be distributed by the Texas General Land Office (GLO). In turn, the GLO allocated \$488,762,000 CDBG-MIT Regional Mitigation Program funds to the H-GAC region.</p> <p>In February 2022, the H-GAC board voted to award just \$9,232,700, or 1.9% of the total dollars to the city of</p>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None

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				<p>Houston. This allocation is meager compared to the need of the most damaged area.</p> <p>The City of Houston makes up 30% of H-GAC's region's population. And, over 300,000 housing units flooded in Houston alone, with more homes impacted than after both Hurricane Katrina and Hurricane Sandy. It is clear that such a large portion of the region with such widespread flood damage deserves more than a mere 1.9% of H-GAC's allotted funds. Further, Harris County's method of distribution is still incomplete, meaning the City of Houston is still left in the dark regarding how much money they may receive from the County.</p> <p>As a Member of the United States House of Representatives, it is my duty to stand up for the needs of my constituents. In more ways than one, the City of Houston has been left behind in essential flood relief. I call upon H-GAC to reconsider their method of distribution and provide the City of Houston with a larger portion of its CD BG-MIT funds. Thank you for your consideration.</p> <p>Sincerely, Sylvia Garcia Member of Congress</p>		
7/21/2022	Email	Jennifer Claridge		<p>It has come to my attention that Houston, the city with the largest flooding problem and the largest population in the state is slated to receive only 1.9% of the federal funding for flooding awarded as a response to the Harvey flooding it received in 2017.</p> <p>This does not make sense no matter how much money Harris County receives. First, the county protects the bayou structures. The city protects the roads, the homes, the businesses, and everything that exists to make Houston the economic powerhouse for Texas that it is. Without flooding mitigation for water that not only comes</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of</p>	

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>out of the sky onto us, but also flows in from neighboring counties, much of the inner core of Houston would become unlivable - including the Texas Medical Center. The improvements made there after Allison cannot withstand the kinds of storms we are likely to see throughout the twenty-first century.</p> <p>Additionally, there are many people, neighborhoods, and businesses, who were unable to repair for many reasons, financial, or because they could not get permits to do so because the existing infrastructure is no longer adequate to withstand the intensity and frequency of the storms that have hit Houston over the last several years.</p> <p>As someone who had to wait years and spend enormous amounts of money waiting for a FEMA grant, the GLO, the Texas Water Board, and the City of Houston to process my elevation grant, I know what this does to real people with real families in Houston. The delays are financially devastating and lead to more and more issues for these families. For all the money to go elsewhere in the state when it is clearly most needed in Houston to repair after Harvey and to build the infrastructure for Houston to withstand the next storm without that kind of destruction, please re-evaluate how those funds are going to be allocated.</p>	<p>\$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	
7/21/2022	Web Portal	Stephen Hinson	Resident	<p>I would like to comment that I feel that it was incorrect for the board to automatically exclude Houston &amp; Harris County from the MOD calculations, just because they had another stream of funding. It would be preferred if they were included in the calculations to at least show the expected distribution without the other stream of funding. Then I think it would be appropriate to then evaluate a specific methodology that might justify reducing the amount of distributions to Harris County and specifically Houston, as all of the listed distribution criteria would be heavily weighted to this region and are where the most</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of</p>	

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				impact of mitigation funding will be achieved. Please reconsider excluding them from the start and incorporate a more reasoned approach to MOD.	their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	
7/21/2022	Email	Larry Schwartz	Resident	<p>I am a citizen of Houston, living in the Meyerland area of SW Houston. We have endured a number of floods from my earliest recollection in the early 1980's until 2017 when Harvey struck. It is my opinion that the City of Houston as well as Harris County as the epicenter of the wrath of Harvey in 2017 deserve more funding to both mitigate and potentially stop flooding.</p> <p>As one who has followed the Project Brays from the 1980's until near completion in 2022. It is my observation that more work is needed to reduce the risk to the population. We have residents who have just re-entered their homes after Harvey reconstruction. Many homes have been demolished and others have been elevated to rise out of the flood plain.</p> <p>With so little available land and so much development there are few opportunities for detention properties and development. We need additional funds to catch up to where we should have been if not having been struck in 2015, 2016 and 2017 with significant flooding. Our accessibility to safe emergency facilities, continuous power to homes and businesses as well as programs to rebuild housing that was lost in Harvey are human rights.</p> <p>It has been totally unfair that the GLO in their lack of compassion decided that Federal Funding to Houston and Harris County was not needed. Given the lack of funding for flood improvements both the City and County need those funds to prepare for the future floods that will come. With global warming we can only expect storms and hurricanes to worsen and grow in strength and</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	None

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				<p>devastation. The time to act is now!</p> <p>Please fund monies to the City of Houston as well as Harris County, to prevent future catastrophes.</p> <p>Larry Schwartz</p>		
7/21/2022	Email	Cliff Haehl	Resident	<p>I am a City of Houston resident and my home flooded in Harvey.</p> <p>The vast majority of flood-related damage from Hurricane Harvey occurred in Southeast Texas, and in terms of sheer numbers of citizens, to Houston residents in particular.</p> <p>While a significant amount of federal funding has been properly provided to Harris County, remember that the Greater Houston area is almost 10,000 square miles, so that money will be spread over a very large area.</p> <p>This email is to strongly recommend that H-GAC revise it's recommendation to the Texas GLO, to allocate a MINIMUM of 25% of available \$488 million to the City of Houston.</p> <p>This will impact the most people, drainage mitigation work is still badly needed, and it is simply the right thing to do. The two allocations (county and City) are separate in their impact.</p> <p>Ask yourself: "If I didn't know about the federal money for the County, what would my recommendation be for a fair City of Houston portion?"</p> <p>Cliff Haehl</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	None
7/21/2022	Email	Sylvester Turner	Houston Mayor	<p>See Correspondence 6-7-21-22-Turner</p> <p>Dear Members of the H-GAC Board,</p> <p>Thank you for the opportunity to offer comments on</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the</p>	

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				<p>HGAC's proposed Method of Distribution. Before offering my own comments, I wish to thank Council Member Sallie Alcorn for her leadership not just as a member of the HGAC Board, but as an advocate for the people of Houston.</p> <p>Both Council Member Alcorn and I believe that the decision by this board to continue with the current Method of Distribution that allocates to the City of Houston less than 2% of available CD BG-MIT monies will not address the needs of the people of Houston and this region.</p> <p>Northeast Houston, Sunnyside, Acres Homes, the East End, and so many other communities were vulnerable during Harvey and without a sufficient allocation and investment of CDBGMIT funds, these communities will suffer again and again with every future major flooding event.</p> <p>While all of our communities were affected, those that were most severely impacted and will continue to be vulnerable are our historical communities of color. HUD has already found that GLO has discriminated against this minority population, but HGAC can stop that inequity by not following GLO's lead. We are a region, and by working together we can serve all people - no matter their color or creed.</p> <p>Less than 2% of funding for a population that makes up over 30% of the HGAC region cannot stand. What meaningful infrastructure investments can we put in place with only \$9 million in a city that spans over 665 square miles and nearly 2.3 million people?</p> <p>At the end of the day, let us not forget that we are talking about people, our people, not just dollars whenever we are choosing the Method of Distribution. Because yes, it is</p>	<p>end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	

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				<p>a choice. We can choose to work together to invest the funds equitably for the most impacted communities as was intended by Congress.</p> <p>Sincerely, Sylvester Turner Mayor</p>		
7/21/2022	Oral at Public Hearing	Sallie Alcorn	Houston City Council Member	<p>I'm Sallie Alcorn, Houston City Council Member and H-GAC board member.</p> <p>When it comes to flooding, it is Houston – the most populous city in the 13-county region – that has borne its undue share of the burden. The 2015 and 2016 floods impacted 26,000 Houston homes. In 2017, Hurricane Harvey flooded nearly 350,000 residences with an estimated \$16 billion in damage.</p> <p>When Congress passed legislation in 2018 to provide funding for Texas and other states affected by disasters, the allocation was based on events in 2015, 2016, and 2017. As is well known, Houston was severely and disproportionately impacted by disasters in all three of these years. Flood mitigation needed in Houston and Harris County was a key factor in determining the amount of federal funding to authorize and send to the state of Texas. I have spoken to several of our federal elected officials and believe me, all of them expected Houston to receive significant funding from this legislation – none intended Houston to be completely left out of the mix.</p> <p>The Hurricane Harvey State Mitigation Competition which resulted in Houston receiving ZERO dollars is under a cloud of scrutiny. In March 2022, HUD's Office of Fair Housing and Equal Opportunity concluded that the GLO's process was discriminatory and in noncompliance with Title VI of the Civil Rights Act of 1964 and Section 109 of the Housing and Community Development Act of 1974.</p> <p>And now, with the H-GAC MOD, Houston is again being excluded from funding. This decision by the board was predicated on the fact that Harris County, after originally</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments along with all other comments we received, including H-GAC's responses and a summary of the comments by locale and category, to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

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				<p>also being left out of the GLO’s statewide competition, was subsequently awarded \$750 million. It’s important to note, as of today, we have NO information from Harris County on how it plans to distribute this \$750 million - there is not even a release date for the county’s draft MOD. So how can we move forward with H-GAC's MOD without this information?</p> <p>Over the course of this MOD process, H-GAC has received numerous comments in support of Houston receiving an increased share of funding. What do we plan to do with these comments? When people complained to the GLO during its process that Houston wasn’t getting funding, they were directed to participate in the public hearing on the draft H-GAC MOD. Basically, the GLO was saying you have another bite at the apple through the council of governments. So here we are.</p> <p>It’s important the public knows their comments will be taken seriously and changes to the MOD will be incorporated. I certainly hope we are not just using these hearings as an opportunity to check a box before rubber-stamping the MOD.</p> <p>Early in the MOD process before it was announced Harris County would receive a separate allocation, Houston was anticipated to receive 35% of H-GAC's initial funding. This makes much more sense. In keeping with this logic, Houston deserves at least a 30% share which would be \$148 million.</p> <p>So, I am urging H-GAC to do two things. Delay consideration of the MOD until after the Harris County’s MOD is released. Secondly, increase Houston’s share of this funding to at least 30%, a more proportional \$148 million. Thank you.</p>		
7/21/2022	Oral at Public Hearing	Stephen Costello	City of Houston, Chief Recovery Officer	Good Evening, thank you for the opportunity to address H-GAC with respect to the proposed Method of Distribution of the CDBG MIT funds. My name is Stephen Costello, here representing the City of Houston as the Chief Recovery Officer. My role as the Chief Recovery Officer is to work	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the	None

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				with federal and state agencies assisting the city in our recovery efforts. Specifically, FEMA has a mitigation grant funds administrated by Texas Department Division of Emergency Management and HUD’s CDBG MIT funds that are administrated by the General Land Office. I had the opportunity to address the Board on the draft MOD on Board Meeting in February 15th. The following comments I believe are pertinent and my observations may be repetitive, however I believe are noteworthy and includes some current items that have occurred post the February Board Meeting. First, as Councilmember Alcorn has indicated the enabling congressional legislation that created these funds was a direct response to extreme weather-related events that occurred between 2015 and Hurricane Harvey. The City of Houston is the only major metropolitan community in the region impacted by all 3 events. H-GAC method of distribution recommendations omitting the City of Houston from substantial flooding funding just defies logic, and we believe it is totally inequitable. The GLO amended action plan that has provided the \$488 million dollars to H-GAC and the \$750 million dollars to Harris County has yet to be approved by HUD. Further, on March 4th as Councilmember Alcorn has indicated HUD issued a letter finding non-compliant with title 6 in section 109 concerning GLO’s design and operation of the Hurricane Harvey State Mitigation Competition Fund, which is exactly where these funds are coming from. Based on GLO’s response to HUD, HUD then issued a letter on May 16th, a formal letter of determination of non-compliance. Specifically stating GLO’s discrimination of Black and Hispanic residents. The H-GAC Board has penalized all cities within Harris County based on GLO’s proposed award of \$750 million dollars to Harris County. Without any knowledge of how the County will distribute these CDBG Mid funds or even if the amended state action plan has been approved by HUD. At the February Board Meeting members of H-GAC’s water	H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. This allocation was approved on March 18, 2022 as part of GLO's State Action Plan Amendment 1. You can find more information on Harris County's program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	

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				resources committee publicly stated that the method of distribution would be re-visited based on Harris County's proposed method of distribution, to date Harris County has yet to make that available. Absent the approved state amended action plan, resolution of the discrimination issue and information associated with Harris County's method of distribution, any effort to identify the local H-GAC's method of distribution is premature. Respectfully I ask that the board table this issue at this time. Thank you.		
7/21/2022	Oral at Public Hearing	Amy Peck	Houston City Council Member, District A	Good evening my name is Amy Peck, address is City of Houston and I represent District A in Northwest Houston. I am speaking today to oppose the preliminary method of distribution of the \$488 million dollars CDBG Mitigation funding. And I'm advocating for the City of Houston to receive more than the proposed 1.9% of the total. To put this in perspective a little, I have over \$130 million dollars of identified flooding mitigation projects needed in my district alone. These are just areas that have been pre-engineered and does not even include need and projects on other parts of my district that do not have a cost associated with it. All of the neighborhoods included in this \$130 million dollars are low to moderate income areas and none of this money is included in the city's capital improvement plan. The \$9 million dollars that is being proposed for the City of Houston wouldn't even be enough for one of these needed projects in my district alone. I am aware that Harris County will receive the \$750 million dollars for flooding mitigation but there's no guarantee that any of this money will be appropriated inside the City of Houston. Even if they do spend some of this money inside the City of Houston, it still would not be enough to mitigate significant flooding issues. Houston is going to continue to flood unless we take real measures now. These measures must include a regional solution because the implications of Houston's flooding go far beyond the cities boundaries and this money is part of that solution. We are talking about real people here, lives that could be	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None

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				lost, property that will be lost and the Board has an opportunity right here to make the difference. And I urge the Board to consider the impact that this will have on people when they take this vote. Thank you.		
7/21/2022	Oral at Public Hearing	Charles Goforth	President, Brays Bayou Association	Hi I'm Charles Goforth, I am President of the Brays Bayou Association and we were founded back in 1983 after a series of devastating floods throughout Houston. Sound familiar? Back then there really wasn't many funds appropriated or this kind of avenue to do repairs. So, the Brays Bayou Association advocated for Project Brays. So, through our initial studies that we funded we were able to get Harris County Flood Control District and Army Corps of Engineers to do the \$500 million dollar Project Brays. With that being said, all roads point to Houston. The City of Houston is integral to everything in the Harris, the Houston Galveston Area Council. It is the center of it. We need to have the funds distributed to the areas that need it the most. And what I mean need it the most, our bayous flow more of a east west direction, west to the east, excuse me. Our infrastructure is the oldest infrastructure in the region. Our work base is the driving factor of the region. So, I'm kind of at a loss that we're being left out of the funding. I won't say entirely left out of the funding, but I will concur with Councilmember Alcorn, 35% of the general funds that are coming out of this \$488 million dollars is appropriate. We're not asking for everything, but we need to have a chunk of the appropriate funds. I appreciate your time and once again, all roads lead through Houston. As Houston goes the region goes. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None
7/21/2022	Oral at Public Hearing	Sylvester "Skip" Reeder	Member of Houston One Voice	Thank you. I'm with Houston One Voice. Houston One Voice was engaged to do a study of the Rufino landfill opportunity. A Rufino landfill was a landfill that had been closed for 40 years. They asked us to review that landfill to determine what could possibly that landfill be used for. All of our members of our community said that what we need the most is to protect ourselves from flooding. And	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to	None

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				looking at Houston One Voice is a nonprofit corporation that partners with the University of Houston and the research universities and detention basin, landfill was 144 acres. 2500 acre feet of detention space and 800 million gallons of storage water. Right now, the only thing that is keeping us from doing that is money. I want you to know who I'm talking to. I am speaking to our neighbors of the 13 counties. I want you to know that the ability to convert that landfill into a detention basin will save 5,000 homes downstream. We know unequivocally that it will reduce the flooding precipitously downstream. Our study and the ability to do that is going to take money. But more importantly It's going to give you those 12 counties a prototype based on the most economical, the most efficacious approach to turning a landfill of which you have hundreds of. The City of Houston has 15 of them, between 750 acres to 3,000 acres that could be used for landfills in this community. What the study would do and what the conversion of this landfill would do will give you that prototype that we can do all of those the same in your communities where you have hundreds. Today if you establish a landfill you're going to take, most of that landfill will be taken off the tax rolls in perpetuity...	submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	
7/21/2022	Oral at Public Hearing	Naomi Ostfeld	Brays Oak Super Neighborhood Council 38	My name is Naomi Ostfeld... I am here on behalf of the Brays Oak Super Neighborhood Council 36- The Brays Oak Super Neighborhood requests that the H-GAC revise its current MOD provisions, which excludes cities located in Harris County from funding consideration until the reallocation of declined funds. If there are no declined funds Houston and other cities in Harris County will receive 0 dollars from the H-GAC. We all believe these provisions are inconsistent with the intent express and the GLO staff responses in the state action plan amendment 1. If the H-GAC disagrees, then as an alternative the Super Neighborhood requests that the H-GAC wait to submit its MOD plan to the GLO until Harris County publishes its MOD plan and the 2 can be coordinated. In amendment 1	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The City of Houston's allocation under the conditionally-approved MOD is \$9,232,700. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in	None

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				<p>section 5.4.5.4 the GLO states that “funds from the Harris County MOD may be allocated to” Harris County cities and towns located within Harris County and special purposes districts. The GLO wrote MAY, not shall or will or must. The decision regarding who receives an allocation is discretionary with Harris County. The primary concern is that each proposed project must mitigate one of the identifiable risks contained under section 5.4.5.1. Therefore, it is possible that none of the cities will receive an allocation. As discussed earlier, the GLO is giving H-GAC \$488,762,000 dollars and Harris County \$750 million for a total of \$1,238,762,000 dollars. In response to received comment in which the commentors stated that Houston will still receive \$0 dollars for its mitigation projects, the GLO staff response included the following “the City of Houston is an eligible entity in both the Harris County mitigation method of distribution and the regional mitigation program where the Houston Galveston Area Council method of distribution.” In response to a Houston City Councilmember the discussed needed drainage projects in her district but does not have any funding for it, the GLO staff included in its response “the GLO encourages the commentor to participate in the public planning meeting and the...”</p>	<p>Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	
7/21/2022	Oral at Public Hearing	David Wheaton	Brays Oak Super Neighborhood Council 38	<p>My name is David Wheaton, I represent Texas Housers. I want to reiterate what a lot of people have said so far today. Which is, I think the H-GAC should modify the method of distribution to give increased funding to Houston, specifically, and also Harris County. Houston and Harris County region make up about 70% of all Black and Hispanic, non-white folks in the Houston Galveston Area Council’s area. So, leaving out Harris County and the City of Houston, would greatly discriminate against Black and Brown Texans in the gulf coast area. I also think that again, Houston has a lot of neighborhoods that have been historically disinvested from and this is where we see a lot of increased flooding when we do have a hurricane</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant –</p>	None

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				season. And so, to ignore these neighborhoods would be a travesty because this billion-dollar program that the federal government gave funds to, specifically laid out that these funds are supposed to go to disinvested communities. And so we are truly missing the point and missing the action of giving these funds to disinvested communities so that they can have better flood resilience when the next storm hits. Those are my thoughts.	Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your communities.	
7/21/2022	Oral at Public Hearing	Gladys House-El	CDC of Freedmen's Town	It is unfortunate that funding is going to the City of Houston and the General Land Office because the City of Houston continues to withhold the necessary funding to assist the disadvantaged communities. And I am just alarmed that the funding, so much funding keeps being allotted to the City of Houston and there are no checks and balances and so forth. And then on the other hand when you look at the general land office, it is extremely racist. On down to the contractors, a handful of contractors that they have selected to do work on the Hurricane Harvey housing deal. And I can attest firsthand to the blatant racism. How they destroy, the contractors destroy your property with impunity and there's no one to really talk to or complain to. So, you're going to have to ensure H-GAC, that they're going to be contract compliance officers in place, similar to like an ombudsman. Because we need someone to be our voice, because right now the City of Houston and GLO, they are both evil and they ended up suing each other wasting nearly a million of our tax dollars. And still the end result was get in there and provide the services to the persons who are targeted and really need the funding. So I really hope that H-GAC would get with HUD and everyone else who is responsible for this funding to ensure that the racism, the discrimination on both parties will cease. And not continue with impunity and it's like both entities are being rewarded for their injustices against my communities and my businesses and my people. Thank you so much, Peace	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
7/21/2022	Oral at Public Hearing	Roy Lira	Houston Super Neighborhood Alliance	My name is Roy Lira, affiliated with the Houston Super Neighborhood Alliance. I'm speaking in favor of delaying and revamping the funds allocation process. As a Houston, as a resident of Houston's East end and vice chair of the Houston Super Neighborhood Alliance I've had the opportunity to speak with and visit other representatives of underserved communities within the City of Houston. Although the GLO published criteria that is intended to serve these residents at greatest risks, once again with the distribution formula these areas will be victims of a process intended to directly help them. Removing Houston from funds distribution creates, will create unintended quality of life and economic consequences that go beyond the City of Houston when we look at the economic impact of cities, of areas of residents that rely on the City of Houston for work. My asks include delay the Board vote until Harris County releases their distribution formula and even after Harris County distribution plan is published, recalculate the amount allocated to Houston that more fairly represents the 30% population within the Eastex area. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None
7/21/2022	Oral at Public Hearing	George Frey	Houston SuperNeighborhood-14	Hello, George Frey from Houston, TX. I had previously commented and asking why the Harris County was omitted from the calculations and was told in a previous meeting that it was a subjective, entirely subjective, decision by the Board. And I just question if it really should be subjective given all the other attempts to make this an objective and quantitative assessment. And to me the easiest action would be to just use these exact same formulas, including Harris County in the mix to see where the proportion would lie. Thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
7/21/2022	Oral at Public Hearing	Bridgette Murray	President, Pleasantville Area Super Neighborhood Council	Thank you for the opportunity. My name is Bridgette Murray, I'm also president of the Pleasantville Area Super Neighborhood Council here in Houston, TX, As you all know both the city and Harris County did submit projects for funding for these mitigation dollars and the City of Houston projects were not considered or funded at this time. So, my question is if you all do make a decision to provide funding to the City of Houston, will those projects be considered? Or will we have to go through a re-application process? A project was submitted for our community and I live near the Port of Houston, just 2 miles away and the project was intended to alleviate flooding. In addition, a lot of these port communities are located in the San Jacinto River watershed and yet we received no funds from that particular watershed from any of the flooding issues that have been ongoing for many years. The inequity suffered by these vulnerable populations due to flooding should be elevated for funding. And we all know that the dollars that are being considered here tonight may not cover all of the expenses throughout the City of Houston, but we have many vulnerable communities throughout the City of Houston that deserve funding. And I do appreciate all of the comments from the City Councilmembers and City Representatives here tonight. So, thank you.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None
7/21/2022	Email	Karla Cisneros	Houston City Council Member, District H	See Correspondence 4 - 7-21-22-Cisneros  Dear Board Members, As the City Council Member for District H in the City of Houston, I am writing to urge reasonableness and to voice my deep concern and opposition to the current recommendation that severely underfunds low- and moderate-income residents of Houston.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>The proposed MOD for the \$488 million in funds to address flooding is unfair and is a severe blow to the exact communities that these Community Development Block Grant-Mitigation funds were designed to help. Adoption of this recommendation compounds the very harmful impact of the decision in February of this year to only award 1.9% of the Texas GLO funding to the City of Houston, when almost one third of the H-GAC’s population falls within the City of Houston. And despite the funding that was allocated to Harris County, it still remains to be seen what portion of that award to Harris County last February, will be invested in the City of Houston.</p> <p>Please reconsider the formula and adopt a Method of Distribution that fairly, responsibly, and equitably serves all those who are desperately in need of assistance for flooding mitigation, even if they live in Houston.</p> <p>Sincerely, Karla Cisneros Council Member, District H</p>	to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	
7/21/2022	Oral at Public Hearing	Danielle Goshen	Policy Specialist/National Wildlife Federation	<p>Thank you, my name is Danielle Goshen and I’m the Policy Specialist/Counsel for National Wildlife Federation in Austin, TX. Thank you for the opportunity to submit these comments. Under H-GAC’s proposed Method of Distribution Harris County municipalities and jurisdiction are not eligible to receive distribution from the COG. H-GAC reasons that since Harris County was allocated \$750 million by the GLO and state action plan amendment 1 that it is already receiving its fair share. In order to ensure equitable results however, Harris County, The City of Houston and other municipalities within the county’s jurisdiction must not be left out of an allocation. First, under the Hurricane Harvey State Mitigation Competition, Harris County and The City of Houston originally were set to receive 0 funds under the CDBG MIT program. After notice that this would occur, Texas Housers and Northeast</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).</p> <p>We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>Action Collective filed a complaint with HUD alleging a violation of Title 6. Earlier this year HUD agreed with the complainants and found that the GLO’s prioritization factors worked to discriminate based on the basis of race and national origin particularly against Black residents in violation of Title 6. After significant political backlash from these events the GLO amended its state action plan to provide that \$750 million dollars to Harris County to distribute. The impetus for providing these funds to Harris County for its own method of distribution was due to the GLO’s discrimination under the Hurricane Harvey State Mitigation Competition, which was always separate from the allocation that the GLO gave to the COGs for their own method of distribution. The 2nd reason is that the COG wished to remove or the 2nd reason that this would produce inequitable results is that if the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition it shouldn’t single out Harris County alone. Nowhere else in the COG’s method of distribution does H-GAC remove other entities that receive funding under the Hurricane Harvey State Mitigation Competition from eligibility to receive funds. 3rd removing Harris County and municipalities within its jurisdiction from the method of distribution, removes the most eligible and most diverse region within the COG from eligibility. Doing so would therefore hinder equitable outcomes and could arise to violation of Title 6 as well. Additionally, we need to burn some delays and the method of distribution. So, moving on, the distribution factors used could also be tweaked to better distribute funds equitably across the region. We believe that H-GAC should focus on ensuring the greatest amount of funds for those areas most vulnerable to hazards. So, using different tools like the CDC’s social vulnerability index can be used to as a distribution factor to help identify those areas most vulnerable to hazards. Further using personal and real property damage as a</p>	<p>on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p> <p>Regarding the question of using Social Vulnerability Index data, H-GAC used the Department of Housing and Urban Development’s Low-to-Moderate Income (LMI) population data as an equity factor instead of the Social Vulnerability Index (SVI), because LMI data directly captures areas with low-income households and is available at the Census-Block group-level. Conversely, SVI is a complex factor derived from multiple variables and is unavailable for some entities in the H-GAC region. A fundamental focus of our review of allocation formula and data factors was that they should be straightforward, universally available, and applicable for all entities potentially receiving allocations.</p> <p>Regarding the comment on green and natural infrastructure, the H-GAC Board considered the potential eligible uses for allocations. To allow for the greatest degree of flexibility for our local governments, the Board decided to retain all eligible activities, including natural infrastructure, outlined in the Texas General Land Office’s State Action Plan Amendment 1. We encourage you to work with local entities receiving allocations to prioritize natural and green infrastructure projects in their project proposals.</p>	

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				distribution factor may lead to inequitable results by disproportionately providing funds to higher income areas and could eliminate the effect of using low to moderate income populations as a distribution factor. So, we really want to recommend considering either reducing the weight for...		
7/21/2022	Email	Virgil W. Fisher		<p>Ladies and Gentlemen of H-GAC,</p> <p>Please reconsider your suggested percentage of distribution of mitigation monies to the City of Houston. As you know, Houston received the full brunt of Harvey; my house flooded along with 15 other homes in just my block. Federal and/or state funds going to the county means Harris County, not Houston, TX. Please approve an equitable amount of funds to the City of Houston.</p> <p>Sincerely, Virgil W. Fisher</p>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None
7/21/2022	Email	Unknown		<p>I have always believed that the counties are ultimately the branch of government responsible for flood control and should be in charge of distributing funds as the county sees fit. As a Houston citizen I feel that we should get our fair share but for what purpose? On all of our water bills we pay a fee toward drainage. How much of that is currently being spent for what it was originally intended? The city has mismanaged that fund since inception. It's a good thing they call it a fee because if it were a tax... well you know the story about the original Tea Party, taxation without representation.</p> <p>I for one would like to see a city plan for drainage and</p>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant –	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				detention before asking for handouts that no one in town knows where it will actually end up.	Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	
7/21/2022	Email	Charlyn Graham	Resident	Please allocate a greater percentage of the flood funds to Houston. Charlyn Graham resident	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> .	None
7/22/2022	Web Portal	barry Cohen	National Algae Association 501(c)6	Dear HGAC: Heavy rainfalls creating nutrient runoff (N+P) at non-point sources are entering waterways in 50 states creating harmful algae blooms in lakes and coastlines. Decades of research, testing and monitoring alone have not fixed these devastating water quality problems. They worsen every year affecting fishing, swimming, tourism, real estate values and are a health risk to humans and animals. We would like to discuss potential collaboration with On Location Nutrient Runoff Capture, Recycling and Repurposing Pilot Tests at Non-Point Sources to reduce nutrient runoff entering waterways and On Board Algae Bloom and HAB Remediation, Capture, Recycling (clean water back to waterbodies) and Repurposing Pilot Tests on lakes and coastlines, we are facilitating. Thanks	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
					you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	
7/23/2022	Web Portal	Josh Wallenstein	The Wallenstein Law Group	The City of Houston, making up over 30% of this region's population, is slated to receive merely 1.9% of Hurricane Harvey funds provided for flood mitigation. These numbers are so dissimilar that they give rise to conspiracy theories and those of political malice. Houston was UNDER WATER. The economic devastation was unimaginable. Recognizing the devastation, the federal government delivered funding to help. Your decision to shave off a pittance of that funding to our city, the engine of the Gulf Coast and home to the 4th largest city in the country, is simply obscene and indefensible. We need help to rebuild. We will remember your generosity. Please reconsider.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a> . Thank you for providing insights into the flooding challenges faced by your community.	None
7/25/2022	Email	Leticia Plummer	Houston City Council Member, At-Large 4	See Correspondence 7-7-25-22 Plummer Dear fellow H-GAC Board Members,  I urge you to reconsider the proposed Method of Distribution for the \$488 million Community Development Block Grant-Mitigation funds and work towards a method that is more equitable.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>Over the last few years, I have spent a considerable amount of time with communities who have continuously suffered since Hurricane Harvey. Every episode of rain brings the risk of homes flooding in our underserved neighborhoods, where our communities of color reside. It is, therefore, extremely disappointing that the board wants to continue with the current Method of Distribution by allocating a mere 1.9% of the available CDBG-MIT funds to Houston when our city accounts for 30% of H-GAC's region.</p> <p>The General Land Office has already failed these communities when it discriminated and denied them much deserved flood mitigation money. In addition, Harris County has not decided the Method of Distribution for the funding it received, which leaves the most impacted people, yet again, in a precarious situation.</p> <p>I hope the board will consider the history of risks to the impacted communities and develop an equitable Method of Delivery for the CDBG-MIT funds.</p> <p>Sincerely, Council Member Leticia Plummer, DDS At-Large 4</p>	<p>submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	
7/25/2022	Web Portal	David Douglas	Eng. Administrator, Liberty County	<p>Liberty County desires to do a county wide drainage plan and study. A study of this type is long over due and will allow the county to begin mitigating drainage problem areas that are identified in the study. GLO has indicated that funding for this type of study is available in the CDBG-MIT grant program. Liberty County has been allocated approximately 21.2 million dollars from the CDBG-MIT program and proposes to use approximately 15 million for the afore referenced study and plan. GLO has indicated that there is no LMI requirement on study and planning grants. HGAC has developed a MOD for the CDBG-MIT grant and that MOD has a LMI requirement. Liberty</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD does not currently include planning projects without a built component in excess of applicable funding caps outlined in the GLO's State Action Plan Amendment 1. However,</p>	<p>The MOD may be revised, pending H-GAC Board direction, to include planning-only activities and make them LMI neutral.</p>

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				County respectfully suggests that the HGAC MOD be evaluated in respect to LMI requirements and that the COG consider a variance for entities that wish to do studies and plans.	GLO has indicated that such potential projects could be considered if the H-GAC MOD specifically added them as an eligible activity, and that they would not need to meet the national objective for LMI. We encourage the Board of Directors to consider this issue as the revision and approval of the MOD is being discussed at a future Board meeting.	
7/25/2022	Email	Nate McDonald	Matagorda County Judge	See Correspondence 8 7-25-22-McDonaldH-GAC Staff and Board Members,Please accept this writing as my public comments with regard to the preliminary Method of Distribution (MOD) for U.S. Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Mitigation funds to be provided for our region.In that th H-GAC Water Committee and staff worked for many months to promulgate a fair and equitable MOD for the 13 counties of the H-GAC, that was debated by and approved by the elected officials who comprise the Water Committee with multiple scenario input from H-GAC staff, then sent to the full H-GAC Board of Directors, which is comprised of elected leaders from each of our region's counties, as well as elected leaders from each of our region's largest cities; my belief is that this MOD has been transparently and publicly vetted, and was approved for submittal to the TX GLO by a public vote by the majority of the H-GAC Board of Directors present at the February 15, 2022, H-GAC Board Meeting.This MOD is the culmination of, m many cases, years of planning, studies and modeling to bring forward shovel ready projects within this entirety of our region. Most are multi-jurisdictional projects that have much benefit for both upstream and downstream partners. There are no jurisdictions who will have 100% of their mitigation needs met, but by working together as a region, we will have prioritized the biggest needs and met many of those.As we know that Harris County received a direct appropriation of 750 million dollars and that the other twelve counties have 469 million dollars to divide between them, my belief is that Harris _County has plenty	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				of mitigation funds to Spend with the cities within Harris County and that some very good projects can be accomplished in the balance of the region with the other 469 million dollars, if this MOD is given final approval by the TX GLO and HUD. There are rainy more mitigation needs in our region than just those that reside in Harris County, thus I urge the TXGLO and HUD to approve this preliminary MOD as written and allow our region to access these funds and build out the mitigation projects in each of our counties. Thank you for allowing me to make these comments and please have a good day. Best regards, Nate McDonald County Judge Matagorda County		
7/26/2022	Email	James Thurmond		<p>The HGAC statement on the MOD webpage that “Neither Harris County nor cities wholly within Harris County are included in this funding allocation” absolutely does not make sense to me. It is neither logical or rational from the perspective of where the greatest number of people live and where the most damage occurred.</p> <p>I am a retired city manager with 30 years of experience in four different Texas cities, the last one being Missouri City, where I currently reside. So, as far as my personal self-interest based on my place of residence, I should be overwhelmed with HGAC’s generosity to the 12 HGAC counties included in the funding MOD because it includes my home county of Fort Bend County and that portion of Missouri City in Harris County, but ethically, it is not right.</p> <p>The fourth tenet of the Texas City Management Association Code of Ethics states “Recognize that the chief function of local government at all times is to serve the best interests of all of the people.” Admittedly, this code is applicable only to city managers and within their respective jurisdictions. However, it has been argued that a manager’s responsibility should include his/her neighboring jurisdictions especially when there are boundary-crossing problems. The same should be true for</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>all public officials when confronted with a problem that cross boundaries.</p> <p>Simply put, HGAC is composed of over 130 local governments, and while their first legal obligation is to look out for the interests of their specific jurisdictions, it seems to me that when a problem crosses jurisdictional boundaries, then they should be looking out for all the jurisdictions which suffered from the problem – i.e., Harvey flooding.</p> <p>Perhaps, I am missing something that justifies the deletion of the Harris County and its cities from the CDBG funding. If I am, please advise.</p> <p>Thank you for the opportunity to provide input into the HGAC MOD for Harvey related CDBG Mitigation funds.</p> <p>James Thurmond</p>		
7/26/2022	Email	Peggy Zahler		<p>As a League City citizen and someone who flooded during Hurricane Harvey, I believe it important that all our citizens in the region benefit from flood mitigation programs.</p> <p>Flooding knows no boundaries nor was my financial status checked before the waters came rushing into my house at midnight. With 3 feet of water in my house caused by a damming effect at I45 and Clear Creek, I understand no detention pond or revised drainage plan will address this regional watershed threat.</p> <p>The dynamics of a watershed are complex and regional solutions cross many boundaries. I understand nuisance flooding or street flooding impacting mobility. With opportunities afforded a community, the emphasis on life and safety seem to be paramount when looking to the future. Looking at a project from a total benefit perspective and not pitting income households against</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement because it stems from the funding source itself. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of</p>	None

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				<p>each other seems like a better approach to keeping us all safe.</p> <p>I am unable to control what happens upstream or downstream from me. There is ample data identifying problem areas in regional watersheds. I request that we assess large regional projects which cross several communities. Street drainage projects and localized flooding, impacting small areas, should be viewed and assessed differently then the type of regional projects needed to address watershed issues. With the extreme weather conditions, houses several blocks from the watershed can be flooded with property values of all negatively impacted. Flooding in neighborhoods can determine the future viability of a subdivision.</p> <p>I request that we use this opportunity to have serious discussions about the implications of a significant emphasis on the LMI component for regional projects that can impact thousands. Perhaps, a different perspective of how to view the importance of regional projects is necessary to assure we are using the public’s money to address and solve problems.</p> <p>Peggy Zahler</p>	<p>eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	
7/27/2022	Email	David Forster		<p>Dear Sirs,</p> <p>I would like to offer two comments on the proposed allocation methodology:</p> <p>1) The allocation should consider the merits of proposed projects not only to the population residing within the area of allocation, but to the population residing upstream of a potential project. As an example, allocating \$5 million to an upstream project that benefits only those living upstream is not as effective as an allocation of \$5 million to a downstream project that benefits both the upstream</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of</p>	None

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				<p>and downstream populations. I suggest that the population allocation portion of the funds should not consider only the population living in the political boundaries of the allocated area, but also all impacted populations upstream.</p> <p>2) In the interest of treating all people equally, the LMI allocation part of the formula should be eliminated. Reallocating this weighting equally to the other categories would be a better representation of the damage done by flooding and therefore the most effective way to allocate funds to where they can potentially have the most impact. The Population category already weights allocated funding to more highly populated areas, which ensures funding is allocated to the greatest number of affected individuals regardless of their socioeconomic status. Furthermore, areas of high population density would receive larger allocations and higher population density areas are likely to already have more LMI individuals.</p> <p>Thank you for your consideration,</p>	<p>eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. The MOD, and the funding source itself, requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement.</p>	
7/27/2022	Web Portal	Shelley Skeelee		<p>I live in the Longwood subdivision of Friendswood bordered by Clear Creek to the north. Though I personally haven't flooded my house was next in Harvey and all of the houses nearer the creek did flood. The low point at the intersection of Steele Drive and Myrtlewood was impassable for many days. My neighbor, who was 9 months pregnant, had to be canoed to my house after her home and flooded and she needed to get to the hospital to deliver her child. Another neighbor was recently bought out by FEMA or the City, and the house torn down due to multiple floodings. I pray that we get some relief from the flooding of Clear Creek into the Longwood subdivision.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage</p>	None

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					you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	
7/27/2022	Web Portal	Karla Sinclair		<p>Hello, I would like to give you a very brief background about the area of Friendswood that I live in - Longwood Park. We are right on the border of where Pearland and Friendswood meet (Off of Dixie Farm Road and near FM518 roughly). The creek is on the next block away from my home. I used to have a backyard neighbor. After 4 or 5 times flooding, they finally gave up and took a buy out and had to move away from the home they had lived in for many many years. The lot next to them had already been a tear-down. The lot 2 doors down ended up having to be torn down and they did re-build on blocks at a higher level. Numerous other houses in our area have flooded as well. From what I understand, Harris County and Pearland have made major improvements to get the water out of their areas flowing down towards Galveston or Clear Lake faster so now the much smaller (less tax dollars available) Friendswood gets a ton of water from the rain plus what flows from upstream and then it bottlenecks in Friendswood and causes major flooding for us because improvements have not been made to the jagged creek and plugs in the creek to get the water moving on its way. PLEASE consider providing funds for our area so that improvements can be made so that my neighborhood as well as many other neighborhoods do not experience the horrible flooding situations that we have in the past. Thank you!</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	None
7/27/2022	Web Portal	Missy Powers		<p>Polly Ranch Estates (neighborhood in Friendswood) borders Clear Creek and Chigger Creek. As a resident of a home that has flooded, (most have in the neighborhood) I'm asking for high consideration for our area to be included in the distribution of funds. Thank you!</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to</p>	None

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					submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	
7/27/2022	Web Portal	Barbara McClellan		I am very concerned about flooding risk on Galveston County. In particular in Friendswood, where we have seen increased flooding in northern Friendswood after Brazoria County completed flood mitigation efforts for their residents. Clear Creek is unable to handle the increased volume of water coming from Brazoria and funds to mitigate flood risk in Friendswood and Galveston County are critical. Thank you	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	None
7/27/2022	Web Portal	Melissa Burkett		Friendswood has historically been a pinch point for flooding. The main artery, Clear Creek, is fed by three other creeks. Much work has been done on these creeks, making the water come down faster, but Clear Creek has	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the	None

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				too many bends, curves, vegetation growth, etc. to accommodate this water. Over the years of living in Friendswood, it takes less and less rain to create a flooding situation. A small community with a small tax base, we are in desperate need of state, regional and federal relief. Rising taxes will never be enough to pay for the projects needed to reduce flooding in our community. Our area and city governments are actively working on this relief but they need assistance. Going back many years, we have continually suffered during minor, major and the "super major" storms.	end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	
7/27/2022	Web Portal	Tesa Wroblewski	Director Disaster Recovery and Grants, City of Galveston	The City of Galveston (City) is in agreement with the HGAC Method of Distribution (MOD) and extends its support of finalization of the MOD in its current form. The City believes that the Council has achieved its goal to develop a formula basis for funding distribution based on objective, replicable, and verifiable data that takes into account both the vulnerable populations within all area counties and the impacts that future disasters will have on the region. The City further believes that the MOD meets the Council's guiding principles in that the MOD is an accessible, understandable, and universally applicable allocation formula that has been informed by transparency and inclusivity. While we are sympathetic to and understand the tremendous need in Harris County and, in particular, the City of Houston, the City of Galveston believes that the Council has appropriately considered the Harris County allocation and the significant resources that will be made available through the regional mitigation process for those communities. Delay of the HGAC MOD approval until the Harris County process is complete would put vulnerable communities and citizens in the other 12 counties at a	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO).	None

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				significant disadvantage and cost precious time that, quite frankly, we don't have in the face of potential future disasters. The City of Galveston urges the Council to proceed forward with submission of the MOD for Texas General Land Office approval.		
7/27/2022	Web Portal	nancy Lauritsen		I live in Friendswood, Galveston County and flooded at my house from hurricane Harvey. The water rushing through Clear Creek bottlenecked at Dixie FM and the banks overflowed. There is also a Plug at the golf course on 2351, that is slowing the water flow from Clear Creek to Clear Lake. Funds are needed so this widespread damage does not happen again.	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	None
7/27/2022	Email	Edward Pollard	Houston City Council Member, District J	See Correspondence 9 7-27-22-Pollard  Dear Members of the H-GAC Board,  I am writing to express my opposition to the current Method of Distribution for the CDBG-MIT monies. Under the current MOD, the city of Houston is allocated less than 2% of the available CDBG-MIT funds. Given that Houston's population comprises over 30% of the HGAC region, 1.9% of H-GAC's funding does not sufficiently cover Houston and the surrounding region. Additionally, Harris County's MOD is unclear regarding how much funding the city will	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of	None

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				<p>receive. This creates another obstacle towards helping the people of Houston.</p> <p>During Hurricane Harvey, more than 300,000 housing units flooded across Houston. While the entire city was negatively impacted, District J communities were some of the most harmed. Minority communities are the most vulnerable to major flooding because they have been historically underfunded by the GLO and other entities. This type of discrimination against minority populations further perpetuates flood relief disparities.</p> <p>Within District J, these underfunded communities include Sharpstown, Braeburn, Gulfton, Alief, Westwood, Richmond Plaza South, and St. George. These areas are still suffering from Harvey, and they require adequate investment to improve drainage and other flood reducing infrastructure. Without the necessary funding, these communities will continue to struggle following every major flooding event.</p> <p>As the Council Member for District J, I must advocate for the needs of my constituents. I implore HGAC to allocate more funds to the people who need it the most. We must use the CDBG-MIT funds as they were intended and equitably invest in our communities. Thank you for your consideration, and I look forward to working together on better serving the people of Houston.</p> <p>Best regards, Council Member Edward Pollard District J</p>	<p>\$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	
7/27/2022	Email	Cyrus Reed and Grank Bates	Sierra Club, Lone Star Chapter	<p>See Correspondence 18 7-27-22-Reed-Bates</p> <p>To Whom It May Concern at H-GAC:</p> <p>The Lone Star Chapter of the Sierra Club is the state chapter of the Sierra Club, and the Houston Regional</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to</p>	None

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				<p>Group represents the Sierra Club in counties in the larger H-GAC area. We have roughly 28,000 members in Texas, including approximately 5,000 in the H-GAC region. We participated in public meetings and the comment period with the GLO’s initial MIT-CDBG plan and were supportive of including specific money for the Council of Governments for future distribution as part of that plan. We have had a chance to review the Houston-Galveston Area Council’s (H-GAC) Method of Distribution (MOD) for \$488,772,000 in Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation Program funds. We do appreciate the opportunity to offer brief comments, but are very disappointed that the draft plan appears to cut out opportunities for funding in the area that was most impacted by Hurricane Harvey, as well as the lack of detail to the importance of green infrastructure.</p> <p>We have three main comments: 1. Don’t remove Harris County from funding consideration; 2. Amend the Method of Distribution to better center equity; 3. Prioritize natural and green infrastructure and smart land use and development.</p> <p>1. Do Not Remove Harris County and Municipalities Within Harris County from Eligibility</p> <p>Under its proposal, H-GAC’s MOD would specifically exclude Harris County and municipalities within its jurisdiction from a distribution by the COG. The rationale in excluding Harris County from the \$488 million is that Harris County has been pegged for a future allocation of \$750 million by the GLO in its State Action Plan through Amendment No 1, and will develop its own distribution method. However, that amendment was needed due to the GLO’s initial lack of funding provided for Harris County, and was the result of the rejection of the GLO’s plan by</p>	<p>submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Regarding the question of using Social Vulnerability Index data, H-GAC used the Department of Housing and Urban Development’s Low-to-Moderate Income (LMI) population data as an equity factor instead of the Social Vulnerability Index (SVI), because LMI data directly captures areas with low-income households and is available at the Census-Block group-level. Conversely, SVI is a complex factor derived from multiple variables and is unavailable for some of entities in the H-GAC region. A fundamental focus of our review of allocation formula and data factors was that they should be straightforward, universally available and applicable for all entities potentially receiving allocations. The MOD focuses on equity through its use of LMI data as an indicator of vulnerable populations in determining allocations and its LMI requirements for use of the funds. The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement. The Board of Directors elected to retain all eligible activities available under the GLO's State Action Plan Amendment 1, including natural and green infrastructure projects. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the</p>	

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				<p>HUD, and is unrelated to this pot of money.</p> <p>In fact, Harris county and the City of Houston had the largest number of households impacted, the largest disaster damage score, the biggest low-to-moderate income population, and the highest population in the floodplain. Indeed, Amendment No. 1 only occurred after Texas Housers and Northeast Action Collective filed a complaint with the United States Department of Housing and Urban Development (HUD), “alleging that GLO’s design and operation of the Competition discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.”</p> <p>Earlier this year, HUD required the GLO to enter into a Voluntary Compliance Agreement (VCA) to avoid further scrutiny by the United States Department of Justice (DOJ). In the meantime, as a result, the GLO has amended its State Action Plan (Amendment 1) to include the Harris County Mitigation Method of Distribution – providing \$750 million to the county to distribute. Amendment 1 more than doubled the funding in the Regional Mitigation Program – the GLO’s second largest program – from \$500 million to nearly \$1.2 billion. Importantly, the programs that the GLO amended in order to provide funds to the Harris County Mitigation MOD were always separate from the Regional Mitigation Program – and nowhere under the State Action Plan was there any discussion about excluding Harris County or municipalities within its jurisdiction from the Regional Mitigation Program due to Amendment 1.</p> <p>It makes no sense to cut Harris County and its cities out of the allocation simply because Harris County will be getting a separate portion of funding. Instead, we should consider equitable funding as a whole, including the H-GAC initial pot of \$488 million being discussed.</p>	<p>MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects, and consider natural infrastructure options and ways to ensure equitable outcomes.</p>	

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				<p>In fact, the GLO has already awarded money to many jurisdictions that are part of the H-GAC under the Hurricane Harvey State Mitigation Competition. If the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition, it should not single out Harris County and municipalities within its jurisdiction from eligibility. Nowhere else in the COG’s MOD does H-GAC remove other entities, or reduce the amount of funding eligible to those entities, if they received funding under the Hurricane Harvey State Mitigation Competition. Therefore, we believe that the COG unjustly singles out Harris County and municipalities within its jurisdiction for exclusion.</p> <p>In addition, removing Harris County from the H-GAC MOD opens the COG up to a Title VI complaint since it excludes the most diverse region within the COG from eligibility. If an investigation did occur, it could open the COG up to timely delays – harming the region as a whole.</p> <p>We strongly urge H-GAC to allow Harris County and the municipalities within its jurisdiction eligibility to receive funds. While we do not have a specific number to suggest, we would note that the City of Houston has recommended that 30%, or \$148 million, of the COG’s funds should go to the city. We believe that assuring that 30 to 40 percent of the funds go to the City of Houston and Harris County is appropriate.</p> <p>Distribution Factors Should Focus on Ensuring Equitable Distribution of H-GAC COG MOD Funds</p> <p>The COG MOD should allocate funds to mitigate disasters in the areas of highest vulnerability and the areas most at</p>		

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				<p>risk due to hazards. One way to achieve this would be for the CDC’s Social Vulnerability Index (SVI) to be added to the distribution factors. Entities with high SVI scores should be prioritized for distribution of funds under the MOD. Providing equity in funding to areas and peoples that are most vulnerable is key.</p> <p>Under the current proposed framework, H-GAC puts a high value on personal and real property damage as a distribution factor. This tends to disproportionately provide funds to high income areas. Thus, areas that are less vulnerable may under the MOD that is proposed may benefit more than more vulnerable areas. Instead, the MOD should prioritize equity and vulnerable areas.</p> <p>. We recommend reducing the weighting of personal and real property compared to other factors that would distribute funds to the most vulnerable areas with the highest risk. We do not object to giving personal and real property damage some consideration but believe it is over-emphasized in the proposed MOD.</p> <p>Prioritize natural or green infrastructure projects and also projects to make the coast more resilient through local land use and building codes.</p> <p>Natural or green infrastructure projects were heavily encouraged for the use of CDBG-MIT funds in the GLO’s State Action Plan. However, out of the 81 projects that were chosen for initial funding by the GLO, only one project incorporated natural infrastructure features.</p> <p>Green and natural infrastructure projects benefit communities year- round, reducing risks from multiple hazards such as improving air and water quality and mitigating urban heat island effect, while also providing recreational spaces for communities. There are vast areas</p>		

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				<p>of native prairie and important woodland lands that can and should be protected and could be an important asset in protecting coastal communities.</p> <p>Due to the importance of green and natural infrastructure projects, we urge H-GAC to promote green and natural infrastructure by reconsidering a set aside for natural or green infrastructure projects. This can be done by making natural or green infrastructure a regional priority and limiting subrecipients in the region to projects that meet that priority. Even in “traditional” infrastructure projects H-GAC can provide additional consideration if those projects include some attention to green design and infrastructure as part of the overall project.</p> <p>In addition, prioritizing projects that involve comprehensive land use ordinances and adoption of modern building codes – such as the suite of 2021 International Code Council - can assure that new construction is built in appropriate non-flood-prone areas and built to standards meant to withstand hurricanes and reduce water and energy use. It is vital for cities and counties to invest in modernizing our land use ordinances and adopting and enforcing modern building codes.</p> <hr/> <p>The Lone Star Chapter of the Sierra Club and the Houston Regional Group of the Sierra Club appreciate this opportunity to submit these brief comments,</p> <p>Cyrus Reed, PhD Conservation Director Sierra Club, Lone Star Chapter Cyrus.reed@sierraclub.org</p>		

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				Frank Blake Conservation Committee Houston Group, Sierra Club frankblake@juno.com		
7/27/2022	Email	Ronald Lovely		<p>If we don't fix Clear Creek it doesn't matter how much money jurisdictions get for their neighborhoods. You can't keep pushing more water into Clear Creek and get less flooding until we lower the elevation of flow in Clear Creek. Clear Creek is the cause of catastrophic flooding of neighborhoods in the Clear Creek watershed.</p> <p>Please allocate all money to watersheds based on the number of flooded structures from the most recent catastrophic flood. That would be Harvey. Please allocate all money for the Clear Creek watershed toward the goal of terracing Clear Creek to lower the elevation of water in Clear Creek during a flood. This will make a place for the water to go. Jurisdictions can then use their local funding to get water out of their neighborhoods without flooding their downstream neighbors. Please allocate all HGAC funds for the Clear Creek Watershed toward lowering the elevation of water in Clear Creek so that jurisdictions can move water out of their neighborhoods without flooding their downstream neighbors.</p> <p>We have to lower the flow of water in Clear Creek to save neighborhoods. Otherwise moving water out of neighborhoods to Clear Creek just floods other neighborhoods. Thank you.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Allocations to local governments are based on a formula that includes multiple factors and is applied equally across all eligible jurisdictions, including both urban and rural areas, other than jurisdictions or portions of jurisdictions within Harris County. Additionally, each county except for Harris receives a base funding allocation. An additional allocation is made to H-GAC to directly support regional and urgent need projects. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.</p>	None
7/28/2022	Email	Maureen Viaclovsky		Many of us are So Frustrated with the delay in & lack of substantial flood control efforts in Friendswood anywhere near us! It has been nearly 5 years since we were flooded & we have seen no major changes to prevent the threat of	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				flooding again in our area! We live in Polly Ranch near Chigger Creek & Clear Creek and we request flood mitigation that will help us - PLEASE!	end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects for your area. Thank you for providing insights into the flooding challenges faced by your community.	
7/28/2022	Web Portal	Chuck Stansy		The army core of engineers Brazoria County, Harris County, Harris County drainage association, and Pearland, have spent 50 years making sure they could drain their part of the 260 square mile water shed out to clear lake. I wish that Galveston County and down stream municipalities would have had as much foresight. It is getting worse, not better!	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Thank you for providing insights on flooding challenges in your community.	None
7/28/2022	Email	Nick Kornuta	Flooding and Drainage Committee Chair, Super Neighborhood 17, Eldridge/West Oaks	<p>Dear H-GAC,</p> <p>We wish to provide feedback on the MOD for the Flood Mitigation Funding, as it pertains to the City of Houston (CoH), on behalf of Super Neighborhood 17 (SN17).</p> <p>SN 17 lies entirely within the boundaries of the CoH. While we are in Harris County, our infrastructure is maintained by CoH and not Harris County Pct 4, as would be the case for other large areas of west Harris County. SN 17 has as</p>	Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>its northern boundary, Buffalo Bayou. As such we experienced widespread damage from Hurricane Harvey's flooding. And, much of this damage was compounded by the old and improperly maintained drainage system that is managed by CoH.</p> <p>There is a very distinct difference in jurisdiction for Harris County and CoH. As you must know, about one half of Harris County's ~4.5 million residents live within the CoH. The other half are in the County's jurisdiction and their infrastructure is managed by Commissioner's Court. It seems unimaginable that the CoH is only scheduled to receive 1.9% of the \$488 M in funds to be distributed by the H-GAC in the upcoming process. Statistically, a huge portion of those affected by the damage wrought by Harvey are within the CoH. The funds made available to help mitigate future disasters should be allocated accordingly. To bring the greatest benefit for the money spent. And, considering that many low income families live in the CoH and they often do not have their voices heard, great care should be taken to be certain that funds are equitably shared among those jurisdictions that can can do the most good with those dollars.</p> <p>We are therefore providing our feedback, in the strongest possible way, to significantly increase the portion of the funding allocated to the CoH in the upcoming process.</p> <p>Very sincerely,</p> <p>Nick Kornuta Flooding &amp; Drainage Committee Chair, SN 17 On behalf of Super Neighborhood 17, Eldridge/West Oaks</p>	<p>as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community.</p>	
7/28/2022	Email	Tina Peterson	Executive Director, Harris County Flood Control District	<p>See Correspondence 11 728-22-Peterson</p> <p>The purpose of this letter is to provide public comments on the Houston-Galveston Area Council's (H-GAC) draft</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>Method of Distribution (MOD) for Community Development Block Grant-Mitigation (CDBG-MIT) funding. In February of 2018, the United States Congress appropriated billions of dollars to mitigate the catastrophic damages of extreme weather related events for regions impacted between 2015 and 2017, including Hurricane Harvey, and Harris County is the only County in Texas to have been impacted by Presidentially declared flooding disasters in all three years.</p> <p>The Texas General Land Office (GLO) received more than \$4 Billion to distribute in accordance with criteria established by Congress and the Department of Housing and Urban Development (HUD). The GLO then appropriated \$488 million to H-GAC, of which Harris County is a part of. Inexplicably, the H-GAC’s draft MOD specifically excludes all agencies within the geographical limits of Harris County from any of that funding – with the exception of declined funding that may be reallocated to cities (or portions thereof) located in Harris County.</p> <p>While the MOD states that the reason for this exclusion is because the GLO has separately appropriated \$750 million to Harris County, it provides no statistical measure for this exclusion and does not consider the percent of H-GAC population within Harris County identified by HUD as most impacted and distressed. For example, 73 percent of the low to moderate income population across all of H-GAC’s 13 counties resides within Harris County. Further, the GLO’s amended Action Plan appropriating funds to Harris County has not yet been approved by HUD, and their original Action Plan was found to be discriminatory to Black and Hispanic residences.</p> <p>For these reasons, the Harris County Flood Control District believes approval of the H-GAC MOD at this time would be pre-mature, and respectfully requests that the MOD be</p>	<p>end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Thank you for providing insights into the flooding challenges faced by your community, and for the District's continuing efforts to improve conditions for its constituents.</p>	

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				revised to include eligible agencies within Harris County.  Sincerely, Tina Peterson PhD, PE, Executive Director		
7/28/2022	Email	Abbie Kamin	Houston City Council Member, District C	<p>See Correspondence 13 7-28-22-Kamin</p> <p>Dear Members of the H-GAC Board of Directors, As the Houston City Council Member for District C, I represent nearly 250,000 residents and some of the neighborhoods hardest hit by flooding in the city, including areas with the most repetitive instances of flooding in the entire region. I also serve as Chair of our city's Public Safety &amp; Homeland Security Committee and have the privilege to serve as an alternate at TPC on behalf of the City of Houston.</p> <p>I respectfully submit the following for the record, raising strong objections to the proposed method of distribution (MOD) of Community Development Block Grant-Mitigation (CDBG-MIT) funds as I did in previous testimony at the February 15, 2022 Board Meeting before this body. Flood prone communities in my district and across the city deserve protection. Additional funds must be allocated to the City of Houston under the Houston-Galveston Area Council's (H-GAC) proposed allocation scheme. Alternatively, this item should be tabled or delayed until a more appropriate time.</p> <p>The proposed MOD unjustifiably allocates a mere 1.9% of H-GAC's \$488,762,000, to the City of Houston. This small of an allocation runs contrary to the Congressional intent for these funds and the demographic and hydrological realities of the region over which H-GAC has jurisdiction.</p> <p>The overwhelming population Houston represents when compared to other areas should be considered to ensure funds are fairly and equitably allocated. Houston is home to over 2.3 million people, making up 31% of the entire population H-GAC serves. Its population size is also more</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>than 15 times larger than the next largest member city. Despite representing millions of Texans, the current plan allocates fewer funds to Houston than some of the significantly less populous members, including, in one case, \$2.5 million less than a County with a population of less than 42,000.</p> <p>Jurisdictions with significant flooding history should receive a larger portion of funds as intended by Congress. Houston is the only major city in the region to experience consecutive declared flood disasters in 2015, 2016, and 2017. The funds at issue were allocated by Congress as a response to the weather-related disasters from 2015 to Hurricane Harvey. Looking beyond Harvey, the challenges continue. The City of Houston has experienced at least seven federally declared disasters in six years.</p> <p>H-GAC should not stray from proportional distribution models previously followed in dolling out federal disaster dollars. Houston sustained approximately 50% of the statewide damage in Hurricane Harvey. Recovery from this disaster was the impetus for these dollars to be distributed by H-GAC. Previously, the City of Houston received 25% of total CDBG-DR17 dollars (with Harris County receiving an independent 25%), and about 40% of FEMA hazard mitigation dollars in the aftermath of the disaster. H-GAC should follow common-sense, proportional standards based on damage sustained to ensure lives and the greater regional economy is not at risk.</p> <p>H-GAC should not rely on GLO’s proposed award to Harris County in the determination of funding amounts for the City of Houston. The obvious and blatant issues with GLO’s own funding scheme- that is the source of these funds- is currently being challenged and is not final. As such, H-GAC should, at the very least, delay or table this item until the</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>matter is settled in the eyes of Federal Departments involved. Furthermore, the funding scheme by the GLO, and its de minimis allocation to Harris County should not be considered in the distribution model this body uses. Not only is Harris County a separate and independent jurisdiction from the City of Houston, \$750 million directed from GLO between two of the largest populations and the hardest hit by natural disasters, is wholly insufficient and should not be the basis of this body’s proposal to allocate a mere 1.9% of funds to Houston. It is not known whether Houston will receive any of the funds GLO allocated to Harris County, and it should not be assumed that it will. Any allocation to Houston should be considered independent of Harris County.</p> <p>The ability of the city to effectively protect our communities does not just depend on county bayous and rivers, but on the ability of our urban drainage systems to convey stormwater to larger channels. As a city we are doing all we can with what we have, but it is not enough. Without an adequate and proportional CDBG-MIT allocation, we will not have the drainage capacity to protect lives and livelihoods. Failing to provide that funding will have significant upstream and downstream outfall impacts, putting not only my district’s neighborhoods at substantial risk, but many of the surrounding communities in the H-GAC region. We are all in this together. Without the proper investment in Houston, H-GAC as a whole will not be able to thrive as it has for so many years.</p> <p>I appreciate H-GAC leadership and staff for their work, and the Board’s consideration of the sizeable objections presented by the public. I respectfully request reconsideration of the method of distribution. Alternatively, I ask that this item be tabled or suspended until such time that other funding distributions are</p>		

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>finalized.</p> <p>Respectfully, Abbie Kamin Houston City Council Member, District C Chair, Public Safety &amp; Homeland Security Committee</p>		
7/28/2022	Email	Mary Nan Huffman	Houston City Council Member, District G	<p>See Correspondence 14 7-28-22-Huffman</p> <p>Dear Houston-Galveston Area Council Board of Directors,</p> <p>Following Hurricane Harvey in 2017, Houston was left with \$16 billion in residential damage and nearly 100,000 flooded houses. Almost five years later, the effects of this storm are still being felt in the communities that I represent on Houston's west side.</p> <p>In response to the devastation that was endured by our region, the Texas General Land Office (GLO) allocated \$488,762,000 in federal CDBG,MIT funds to the Houston-Galveston Area Council (H,GAC) for mitigation projects designed to increase the region's resilience to natural disasters.</p> <p>In February of this year, H,GAC's Water Resources Committee and the H,GAC Board approved a preliminary Method of Distribution (MOD) for these funds which allocated a meager 1.9 percent of those dollars to Houston - the largest population center in the region, and fourth largest city in the United States.</p> <p>The consensus of the H,GAC Board seemed to indicate that because Harris County is receiving \$750 million, cities within the county should be mostly excluded. I believe that this rationale is flawed because it does not consider timing.</p> <p>Harris County's MOD has not been released and there is, so far, no indication that the City of Houston will be the</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>recipient of any of the county's CDBG,MIT funds. Improving drainage infrastructure in the largest city in Texas is an issue too important to be left to this kind of assumption.</p> <p>I urge H,GAC to delay approval of their preliminary MOD until after the Harris County MOD is released. Afterwards, H,GAC will be able adjust the allocation for Houston to best account for what funding the city may have received from Harris County. This reconsideration will provide H,GAC with the opportunity to ensure that the communities which received the most devastation will benefit proportionally from these funds.</p> <p>I appreciate your consideration of this request and continue to be appreciative of your service to the residents of our region.</p> <p>Kind regards, Mary Nan Huffman</p>		
7/28/2022	Email	Sylvia Rivas	President, Brays Oaks Super Neighborhood #36	<p>See Correspondence 15 7-28-22-Rivas</p> <p>To the Houston-Galveston Area Council:</p> <p>The Brays Oaks Super Neighborhood Council #36 requests that the Houston-Galveston Area Council ("H-GAC") change the provisions in its preliminary Method of Distribution ("MOD") plan which currently exclude cities located in Harris County from funding consideration until the reallocation of declined funds. If there are no declined funds, Houston and the other cities in Harris County will receive zero dollars from the HGAC. Although the Texas General Land Office ("GLO") may have approved the preliminary MOD, these provisions are inconsistent with the intent expressed in the GLO Staff Responses in the State Action Plan Amendment 1 ("Amendment 1 "). If the H-GAC disagrees, then, as an alternative the Super</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>Neighborhood requests that the H-GAC wait to submit its MOD plan to the GLO until Harris County publishes its MOD and the two MOD plans can be coordinated to ensure funding for cities within Harris County.</p> <p>In Amendment 1, Section 5.4.5.4. the GLO states that "Funds from the Harris County MOD may be allocated to: i Harris County; ii cities or towns within Harris County; and iii special purpose districts .... " Amendment 1, page 251. The GLO wrote "may," not "shall" or "will" or "must." The decision regarding who receives a MOD allocation is discretionary with Harris County. The primary concern is that each proposed project must mitigate one of the identifiable risks under Section 5.4.5.1.</p> <p>Therefore, it is possible that none of the cities located within Harris County will receive an allocation from Harris County.</p> <p>As the GLO Staff commented in some of its Amendment 1 Responses: "Houston, as a city within Harris County, will benefit from projects the Harris County method of distribution identifies." Amendment 1, Page 365. However, the GLO Staff did not end their discussion of funds for the cities in Harris County there.</p> <p>The GLO Staff Responses to commenters regarding cities in Harris County, particularly Houston, made clear that the cities are eligible to receive funding from both the Harris County MOD and the H-GAC MOD. In response to a received comment in which the commenter stated that Houston will still receive zero dollars for its mitigation projects, the GLO Staff Response stated "The City of Houston is an eligible entity in both the Harris County Mitigation Method of Distribution and the Regional Mitigation Program for the Houston-Galveston Area Council Method of Distribution. The commenter is</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>encouraged to contact local public officials for more information regarding the distribution of MIT funding within each of these areas that may benefit the City of Houston." Amendment 1, Pages 354-355. As confirmed repeatedly by H-GAC, the GLO is giving H-GAC \$488,762,000 and Harris County \$750,000,000 for a total distribution amount of \$1,238,762,000 for our region. The GLO Staff Responses makes numerous references to the total of \$1.2 billion being available for distribution for City of Houston projects. For example, in response to a Houston City Council Member who discussed needed drainage projects in her District but does not have any funding for the projects, the GLO Staff Response stated "Action Plan Amendment 1 more than doubles the funds available for the Regional Mitigation Program which focuses on local control of limited mitigation funds available in the state. The GLO encourages the commenter to participate in the Public Planning Meeting and the second public hearing on the draft HoustonGalveston Area Council Method of Distribution and the Harris County Mitigation Method of Distribution where another \$1.2 billion of CDBG-MIT funding will be considered for allocation." Amendment 1, page 379. Similar comments about the \$1.2 billion funding and the dual eligibility are included in GLO Staff Responses to commenters discussing Northeast Houston (Amendment 1, pages 353 and 368), the Brays Bayou area in Houston (Amendment 1, page 379), the Westbury area in Houston (Amendment 1, page 400), the Pleasantville area in Houston (Amendment 1, page 355), and Houston in general (Amendment 1, pages 360,381. 381,382,384,397).</p> <p>What is important is that the \$1.2 billion be used to make our region more resilient in the future which includes reducing or even eliminating future flooding. We hope that H-GAC will redesign its MOD to provide funding to cities located within Harris County and even work together</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>with Harris County to benefit all of the at-risk residents and businesses in our region.</p> <p>Sincerely, Sylvia Rivas, President, Brays Oaks Super Neighborhood Council #36</p>		
7/28/2022	Email	Tiffany D. Thomas	Houston City Council Member	<p>See Correspondence 17 7-28-22-Thomas</p> <p>City Council Member Tiffany D. Thomas’ Response to H-GAC MOD Announcement</p> <p>In February the Houston Galveston Area Council (H-GAC) board voted to award the City of Houston \$9,232,700—only 1.9% of the preliminary method of distribution (MOD) of \$488 million in risk mitigation funds for projects related to flooding, hurricanes, and other natural disasters. Though many board members acquiesced to the notion that cities within Harris County should receive any funds due to the County being awarded \$750 million, I will concede. However, if it had not been for the damage within the City of Houston during Hurricane Harvey, funding would not be available.</p> <p>The proposed MOD is minimal at best and does not truly support the full picture in terms of damage to the families and communities of Houston who have still not fully recovered from the destruction of Hurricane Harvey.</p> <p>The board’s stance aligns with negligent and unequitable ideologies that are harmful to Houstonian’s where infrastructure investments remain a top priority. Moreover, this non-inclusive approach has handicapped the city from appropriately and effectively directing its efforts towards flood mitigation and infrastructural advancements in neighborhoods that need it the most. I represent several neighborhoods where residents are arrested with fear that their home might flood after a rain occurrence.</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				The direction that both General Land Office (GLO) and H-GAC has taken against issuing the City of Houston the appropriate and equitable provision is devastatingly critical for our residents. To be frank, the allocation to Harris County instead of the City of Houston should not be viewed as a victory, but instead a complete flex of control over the city by outside entities.		
7/28/2022	Email	Matt Barrett	Water Resources and Flood Management Division Manager, SJRA	<p>Good afternoon, please find below questions/comments on HGAC's preliminary CDBG-Mitigation MOD. Thank you for the opportunity to provide input.</p> <ul style="list-style-type: none"> <li>• If a river authority were to partner with an entity that received funds (i.e., a county) to complete one of the river authority's projects, would the river authority be beholden to the 50%/51% LMI requirement, or would that requirement only apply to the county and all the projects under its umbrella (as a whole)? i.e., would every subrecipient have to meet the LMI requirement, or just the recipient?</li> <li>• Can an eligible entity which receives funds (i.e., a county) provide funds to an entity ineligible to directly receive funds (i.e., a river authority)? If this is possible/under consideration, we would recommend allowing.</li> <li>• Can CDBG-MIT funds be used as local match funding for a federal or other grant program? If this is possible/under consideration, we would recommend allowing.</li> <li>• Can HGAC provide information on its plan to select projects for the regional funds it will be directly allocated?</li> <li>• Is there a minimum project cost requirement, or is that up to each entity that receives funds?</li> <li>• It appears in the draft MOD that covered projects are ineligible and/or not being considered. This is understandable given the relatively small amount of funds going to each entity (including HGAC), but we would recommend not limiting the possibility of covered projects being submitted. There could be an excellent regional project that covers and/or benefits multiple</li> </ul>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). Entities receiving an allocation are subject to the applicable low-to-moderate income requirements of the MOD. Arrangements for meeting the LMI target between the entity receiving an allocation and any potential partners or vendors are up to those parties, subject to GLO approval and any applicable restrictions. Additional guidance on project development, proposal, and approvals will be provided by the GLO subsequent to the approval of the MOD. The MOD allows eligible activities included in the GLO's State Action Plan Amendment 1, which includes use of match for some specific federal projects. The eligibility of match beyond these stipulations will be specific to GLO approval and the requirements of each funding program. H-GAC will develop a program for identifying, prioritizing, and selecting regional priority projects subsequent to the approval of the MOD and the receipt of additional guidance from GLO. The MOD does not specify a minimum or maximum project cost, although they may be implemented by GLO. The MOD does not include covered projects but does include base allocations for counties and the regional priority projects</p>	None

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				entities/counties, and those entities could potentially decide to team up to perform such a project. HGAC could also consider providing its directly-allocated funds to a regional-benefit project of this nature.	allocation designed to encourage multi-jurisdictional efforts.	
7/28/2022	Email	Danielle Goshen	National Wildlife Federation	<p>See Correspondence 19 - 7-28-22-Goshen-Martinez-McCloud-Piacentini-Stokes-Wheaton</p> <p>Dear Mr. Taebel,</p> <p>Please accept this document as the written comments of the undersigned groups regarding the Houston-Galveston Area Council's (H-GAC) Method of Distribution (MOD) for \$488,772,000 in Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation Program funds. As always, our organizations appreciate the opportunity to provide public comment.</p> <p>Our comments and recommendations below focus on the allocations, factors to determine allocations, and set asides for nature-based projects.</p> <p>1. Do Not Remove Harris County and Municipalities Within its Jurisdiction from Eligibility</p> <p>Under H-GAC's proposed Method of Distribution, Harris County and municipalities within its jurisdiction are excluded from a distribution by the COG. H-GAC's explanation for this exclusion is that Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities.<sup>1</sup></p> <p>According to H-GAC's data, Harris county and the City of Houston had the largest number of households impacted, the largest disaster damage score, the biggest low-to-moderate income population, and the highest population in the floodplain.<sup>2</sup> In order to achieve equitable</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Regarding the question of using Social Vulnerability Index data, H-GAC used the Department of Housing and Urban Development's Low-to-Moderate Income (LMI) population data as an equity factor instead of the Social Vulnerability Index (SVI), because LMI data directly captures areas with low-income households and is available at the Census-Block group-level. Conversely, SVI is a complex factor derived from multiple variables and is unavailable for some of entities in the H-GAC region. A fundamental focus of our review of allocation formula and data factors was that they should be straightforward, universally available, and applicable for all entities potentially receiving allocations. The MOD focuses on equity through its use of LMI data as an indicator of vulnerable populations in determining allocations and its LMI requirements for use of the funds. The MOD requires each entity receiving an</p>	None

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				<p>distribution of funds, Harris County and the City of Houston should not be left out of an allocation under H-GAC’s MOD.</p> <p>a. Harris County’s \$750 Million Allocation Under the Harris County Mitigation Method Of Distribution Was to Remedy Previous Exclusion Under Round One of Hurricane Harvey State Mitigation Competition</p> <p>Under the first Hurricane Harvey State Mitigation Competition round, Harris County and City of Houston originally were set to receive zero CDBG-MIT funds from the GLO. After the GLO published press releases detailing the recipients list, Texas Housers and Northeast Action Collective filed a complaint with the United States Department of Housing and Urban Development (HUD), “alleging that GLO’s design and operation of the Competition discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.”</p> <p>Earlier this year, HUD agreed with the Complainants and found that the GLO’s scoring criteria was in violation of Title VI of the Civil Rights Act of 1964 and its implementing regulations (Section 109).3 To remedy the violation, HUD required the GLO to enter into a Voluntary Compliance Agreement (VCA) to avoid further scrutiny by the United States Department of Justice (DOJ).</p> <p>While a VCA has not yet been reached, the GLO has amended its State Action Plan (Amendment 1) to include the Harris County Mitigation Method of Distribution – providing \$750 million to the county to distribute. The GLO was able to provide these funds to the new program, by removing the second round of the Hurricane Harvey State Mitigation Competition, and by taking funds away from other programs. In addition to creating the Harris County</p>	<p>allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. The initial public process for developing the preliminary MOD met or exceeded all applicable requirements for notice and participation. The public comment process following the conditional approval of the MOD also met or exceeded all applicable requirements for notice and participation and expanded the process to 28 days with the addition of an informational meeting, partially in response to public comment. The waiver request for the minimum allocation was requested to account for potential changes in final allocations after entities indicate their decision to accept or decline initial allocations following the conditional approval of the MOD, such that entities very close to the base minimum threshold were not excluded from reallocation funds or other considerations, if eligible. This waiver only affected a single entity. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects and ways to ensure equitable outcomes.</p>	

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				<p>Mitigation MOD, Amendment 1 more than doubled the funding in the Regional Mitigation Program – the GLO’s second largest program – from \$500 million to nearly \$1.2 billion.</p> <p>The motivation for providing Harris County with its own MOD was therefore due to the significant backlash and subsequent HUD investigation which found that the scoring criteria under the Hurricane Harvey State Mitigation Competition violated Title VI. Importantly, the programs that the GLO amended in order to provide funds to the Harris County Mitigation MOD were always separate from the Regional Mitigation Program – and nowhere under the State Action Plan was there any discussion about excluding Harris County or municipalities within its jurisdiction from the Regional Mitigation Program due to Amendment 1.</p> <p>b. No Other Entities That Received Funds Under the Hurricane Harvey State Mitigation Competition Were Excluded From the H-GAC’s MOD</p> <p>The GLO awarded entities within H-GAC’s jurisdiction with over \$333 million in awards (see Table 1) under the Hurricane Harvey State Mitigation Competition.<sup>4</sup> We disagree with H-GAC’s reasoning, that since Harris County is receiving \$750 million under Amendment 1, Harris County and municipalities within its jurisdiction should be excluded from an allocation under the COG’s MOD.</p> <p>TABLE 1 - see attached Correspondence</p> <p>Table 1: GLO Awards by County under Round 1 – Hurricane Harvey State Mitigation Competition</p> <p>If the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition, it should not single out Harris County and municipalities within its jurisdiction from eligibility. Nowhere else in the COG’s MOD does H-GAC</p>		

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				<p>remove other entities, or reduce the amount of funding eligible to those entities, if they received funding under the Hurricane Harvey State Mitigation Competition. Therefore, we believe that the COG unjustly singles out Harris County and municipalities within its jurisdiction for exclusion.</p> <p>c. Excluding Harris County and the Municipalities Within its Jurisdiction Could Arise to a Violation of Title VI of the Civil Rights Act of 1964</p> <p>The GLO, in administration of CDBG-MIT funds certified that it will conduct and administer the CDBG-MIT funds in accordance with the Title VI of the Civil Rights Act of 1964. Further, H-GAC must also adhere to Title VI – and has assured that no COG activity or program shall discriminate against any of the protected classes.</p> <p>Removing Harris County and the municipalities within its jurisdiction from the H-GAC MOD may open the COG up to a Title VI complaint since it excludes the most diverse region within the COG from eligibility (see Table 2). In addition to having the most diverse population in terms of number of minorities, Harris County also has the: lowest percentage of white alone, not Hispanic or Latino population second lowest percentage white alone population second highest percentage Hispanic or Latino population; and third highest percentage Black or African American alone population.</p> <p>TABLE 2 - see attached Correspondence Table 2: Demographic Breakdown of Counties within H-GAC Not only would excluding Harris County and the municipalities within its jurisdiction result in removing the most diverse populations from receiving funding, but an</p>		

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				<p>investigation could open the COG up to timely delays – which would harm the region as a whole.</p> <p>Therefore, because the Regional Mitigation Program was separate from the Hurricane Harvey State Mitigation Competition, no other eligible entities in the Houston-Galveston region that received funds under the Hurricane Harvey State Mitigation Competition were removed, and because removing Harris County and the municipalities within its jurisdiction could arise to a violation of Title VI, we strongly urge H-GAC to allow Harris County and the municipalities within its jurisdiction eligibility to receive funds. We support the City of Houston’s recommendation that 30%, or \$148 million, of the COG’s funds should go to the city.</p> <p>2. Distribution Factors Should Focus on Ensuring Equitable Distribution of H-GAC COG MOD Funds to the Greatest Number of People Most Vulnerable to Hazards</p> <p>The COG MOD should have the goal of allocating funds to mitigate disasters in the areas of highest vulnerability and the areas most at risk due to hazards. Distributing funds in this way will help facilitate equitable outcomes under H-GAC’s MOD. We believe that the CDC’s Social Vulnerability Index (SVI) should be added to the distribution factors. As noted in the State Action Plan, “[e]ffectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster.” Entities with high SVI scores should be prioritized for distribution of funds under the MOD.</p> <p>Further, using personal and real property damage as a distribution factor could disproportionately provide funds to high income areas and therefore less vulnerable areas. Using personal and real property damage could also</p>		

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				<p>eliminate the effect of using low-to-moderate income populations as a distribution factor – since they are provided equal weighting. Therefore, in order to equitably distribute CDBG-MIT funds within the COGs jurisdiction to the areas that are most vulnerable, we recommend either removing amount of personal and real property damage from consideration, or reducing the weighting compared to other factors that would distribute funds to the most vulnerable areas with the highest risk rating.</p> <p>3. Provide a Set Aside for Green and Natural Infrastructure Projects as a Regional Priority</p> <p>Natural or green infrastructure projects were heavily encouraged for the use of CDBG-MIT funds, not just in HUD guidance, but also in the GLO’s State Action Plan. However, out of the 81 projects that were chosen for funding by the GLO under the first round of Hurricane Harvey State Mitigation Competition, only one project seemed to incorporate natural infrastructure features.</p> <p>While traditional infrastructure projects are necessary in many areas, it is also important to invest in innovative green and natural infrastructure projects, where appropriate. In addition to flood mitigation benefits, green and natural infrastructure projects benefit communities year-round, reducing risks from multiple hazards such as improving air and water quality and mitigating urban heat island effect, while also providing recreational spaces for communities.</p> <p>Due to the importance of green and natural infrastructure projects, we urge H-GAC to promote green and natural infrastructure by reconsidering a set aside for natural or green infrastructure projects. This can be done by making natural or green infrastructure a regional priority and limiting subrecipients in the region to projects that meet</p>		

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				<p>that priority.</p> <hr/> <p>The undersigned organizations are dedicated to an effective and equitable distribution of CDBG-MIT resources. Thank you again for the opportunity to provide these comments.</p> <p>Sincerely,  Danielle Goshen  Policy Specialist/Counsel  National Wildlife Federation  GoshenD@nwf.org</p> <p>Becky Martinez  Conservation Director  Bayou Land Conservancy  bmartinez@bayouland.org</p> <p>Ayanna Jolivet McCloud  Executive Director  Bayou City Waterkeeper  ayanna@bayoucitywaterkeeper.org</p> <p>Mary Anne Piacentini  President and CEO  Coastal Prairie Conservancy  maryanne@coastalprairieconservancy.org</p>		
7/28/2022	Email	Madison Sloan and Ayanna McCloud	Texas Appleseed / Bayou City Waterkeeper	<p>See Correspondence 20-7-28-22-Sloan-McCloud</p> <p>Dear Mr. Taebel:</p> <p>Thank you for the opportunity to comment on the HGAC CDBG-MIT Preliminary Method of Distribution (MOD). For the reasons detailed in these comments, including potential violations of Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, and the Fair Housing Act; H-GAC must revise its preliminary MOD before presenting it to</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of</p>	None

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				<p>GLO for final approval and submission to HUD as an Action Plan Amendment.</p> <p>Texas Appleseed1 is a non-profit public interest justice center that promotes social, economic, and racial justice for all Texans. We have worked on disaster recovery issues and to ensure equity in disaster recovery programs since Hurricane Rita in 2006.</p> <p>Bayou City Water Keeper was established in 2001. Our mission is to protect and restore the integrity of our bayous, rivers, streams, and the bays through advocacy, education, and action. Our work includes supporting resilient communities and advocating for equitable solutions to flooding.</p> <p>I. H-GAC’s Exclusion of Harris County from its MOD is Unjustified and Contravenes the Purpose of the CDBG-MIT Program and the State Action Plan</p> <p>H-GAC’s stated reason for not allocating funding to Harris County or any cities within Harris County in its MOD is that “Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities.” However, CDBG-MIT Amendment 1 did not, and was not intended to, exclude Harris County from funding under the Regional Method of Distribution Program. The allocation of funds directly to Harris County in Amendment 1 was intended to partially correct for the state’s use of scoring criteria in its Round 1 Hurricane Harvey Statewide Competitive Grant Competition program that discriminated against Hurricane Harvey survivors on the basis of race, color, and national origin, depriving Harris County and the City of Houston, in particular, of mitigation funding.</p>	<p>their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>. Regarding the question of using Social Vulnerability Index data, H-GAC used the Department of Housing and Urban Development’s Low-to-Moderate Income (LMI) population data as an equity factor instead of the Social Vulnerability Index (SVI), because LMI data directly captures areas with low-income households and is available at the Census-Block group-level. Conversely, SVI is a complex factor derived from multiple variables and is unavailable for some of entities in the H-GAC region. A fundamental focus of our review of allocation formula and data factors was that they should be straightforward, universally available and applicable for all entities potentially receiving allocations. The MOD focuses on equity through its use of LMI data as an indicator of vulnerable populations in determining allocations and its LMI requirements for use of the funds. The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement. The MOD designates allocations for local governments but does not identify the specific projects they will propose to use the allocations for. The Board considered categories of eligible activities for the MOD and decided not to limit the flexibility of local governments receiving allocations to identify their own priorities for projects further than the existing limits of the funding source. We encourage you to share your comments with your local government(s) as they identify and prioritize potential projects and ways to ensure equitable outcomes.</p>	

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				<p>The 2018 Congressional appropriation of \$12 billion for mitigation activities, allocated in proportion to the amount of CDBG-DR funding grantees received for disasters occurring in 2015, 2016, and 2017, “represents a unique and significant opportunity for grantees to use this assistance in areas impacted by recent disasters to carry out strategic and high-impact activities to mitigate disaster risk and reduce future losses.”</p> <p>The Federal Register Notice allocating these CDBG-MIT funds is clear that “[t]he level of CDBG- MIT funding available to most grantees cannot address the entire spectrum of known mitigation and resilience needs.” Consistent with the structure of the Federal disaster recovery system, “HUD restates that disaster recovery is a partnership between Federal, state, and local government and CDBG–MIT grantees should invest in their own recovery . . . HUD expects grantees to contribute to their recovery through the use of reserve or “rainy day” funds, borrowing authority, or retargeting of existing resources.” There are also additional Federal funds to address mitigation needs, including FEMA’s Hazard Mitigation Grant Program.</p> <p>The United States Department of Housing and Urban Development (HUD) emphasized that “[u]nlike other forms of Federal disaster-recovery assistance, CDBG-DR and CDBG-MIT grants have a statutory focus on benefitting vulnerable lower-income people and communities and targeting the most impacted and distressed areas.” “All grantees must prioritize the protection of LMI individuals and describe in the action plan how their proposed programs and projects will reflect that priority.”</p> <p>The State of Texas Hurricane Harvey Action Plan for CDBG-MIT funding, approved by HUD on March 31, 2020,</p>		

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				<p>allocated \$2.1 billion to a Hurricane Harvey State Mitigation Competition State Competition), split into two rounds. The awards for the first round of competitive mitigation grants were announced in May 2021. The hardest hit areas of the state, including Harris County, the City of Houston, Jefferson County, and Nueces County, were not awarded any funding. In response, instead of addressing the discriminatory flaws in its allocation and scoring criteria, the State of Texas proposed Action Plan Amendment 1 (Amendment 1), which eliminated the second round of the State Mitigation Competition, allocated \$750 million to Harris County, and reallocated remaining State Competition and other CDBG-MIT funds totaling \$666.9 million to the Regional Mitigation Program – Council of Governments Method of Distribution. H-GAC was allocated \$488.7 million under the Regional Mitigation Program.</p> <p>According to H-GAC’s own data, Harris County had the largest number of households impacted by Hurricane Harvey, the largest disaster damage score, the largest LMI population, and the highest population in the floodplain.</p> <p>Under Amendment 1: Appendix F,</p> <p>In order to determine the distribution funds for the COG MOD program for counties impacted by Hurricane Harvey, the GLO designed an allocation methodology that accounts for risks to natural hazards, social vulnerability, financial capacity, and population. These four factors form the basis for a weighted sum model that results in a final relative factor that determines the amount of funds to be allocated to each eligible county. Throughout this discussion it should be noted that HUD MID and State MID allocations are split, with 80 percent of funds going towards HUD MID areas, and 20 percent going to State MID areas; as a result, the calculations described below</p>		

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				<p>were performed separately for HUD MID and State MID areas. This section of the appendices explains the rationale for the use of each factor, the source of data for that factor, and the calculations performed to generate the MOD.</p> <p>GLO and H-GAC’s methodologies produced the following allocations: TABLE See Attached Correspondence</p> <p>Under the formula GLO used to allocate funding for the Regional MOD Program Harris County accounted for 30% of the funding HGAC received. If Harris County had been excluded from the regional allocation, H-GAC’s allocation would have been reduced by \$148 million.</p> <p>That GLO intended for Harris County to receive money from the regional allocation funding is also evident from its response to comments on Action Plan Amendment 1. More than 50 commenters stated that Houston or Harris County needed additional funding beyond the \$750 million.<sup>10</sup> In response to at least 14 of these comments, GLO stated that Houston could “participate in the required Public Planning Meeting and second public hearing on the draft Houston-Galveston Area Council (H-GAC) Method of Distribution...” expressing the state’s clear expectation that Harris County and Houston would receive an allocation through the Regional MOD Program process. The GLO created a formula for H-GAC to receive money that included Harris County and repeatedly said that Harris County was eligible for funding through the Regional MOD Program process; excluding Harris County from the H-GAC MOD does not comply with the state’s HUD-approved Action Plan.</p> <p>Further, while H-GAC claims that it is excluding Harris County because it has been allocated other CDBG-MIT funding, H-GAC is not excluding other jurisdictions that</p>		

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				<p>have already received CDBG-MIT funding. Of the 14 counties that would receive funding through the preliminary MOD, 12 counties (including jurisdictions within that county) were awarded a total of over \$333.6 million in the State Grant Competition. The City of Dickinson, for example, received a \$50 million grant through the State Grant Competition, and the MOD allocates the city an additional \$15 million.</p> <p>TABLE 1 - See attached correspondence Table 1: Per capita funding by county from the State Grant Competition. *Assuming the inclusion of the \$750 million allocation to Harris County. Even including Harris County’s separate \$750 million allocation, Harris County’s per capita CDBG-MIT allocation only increases to \$194.71 per capita, the fourth lowest in the region. On March 4, 2022, HUD issued a Letter of Finding Noncompliance with Title VI and Section 109 (Case No. 06-21-1483). HUD found that the General Land Office’s (GLO) design and operation of the Hurricane Harvey State Mitigation Competition “discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.” In other words, the State Mitigation Competition awards were based on a set of criteria that discriminated against Texans on the basis of race, color, and national origin; H-GAC’s failure to account for previous discriminatory allocations in its MOD perpetuates that discrimination and is in itself discriminatory.</p> <p>H-GAC’s decision to exclude Harris County, where 72% of the region’s people of color live, from its MOD on the basis that Harris County was receiving other CDBG-MIT funding but allowing other jurisdictions who had received CDBG-MIT funding based on a discriminatory allocation process</p>		

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				<p>to receive MOD allocations is particularly egregious. However, the fact that the MOD does not account for previous discriminatory allocations resulting from the entire State Mitigation Competition program means that H-GAC’s MOD also discriminates against H-GAC residents who live outside of Harris County on the basis of race, color, and national origin.</p> <p>II. H-GAC’s MOD is Discriminatory on the Basis of Race, Color, and National Origin</p> <p>Title VI of the Civil Rights Act of 1964 mandates that “[n]o 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 be subjected to discrimination under any program or activity receiving Federal financial assistance.” Similarly, Section 109 prohibits discrimination the basis of race, color, national origin, religion, or sex in “any program or activity funded [under the Housing and Community Development Act of 1974].” The Fair Housing Act not only prohibits discrimination but requires all entities administering housing and community development</p> <p>Table 1: Per capita funding by county from the State Grant Competition.</p> <p>*Assuming the inclusion of the \$750 million allocation to Harris County.</p> <p>Even including Harris County’s separate \$750 million allocation, Harris County’s per capita CDBG-MIT allocation only increases to \$194.71 per capita, the fourth lowest in the region.</p> <p>On March 4, 2022, HUD issued a Letter of Finding Noncompliance with Title VI and Section 109 (Case No. 06-21-1483). HUD found that the General Land Office’s (GLO) design and operation of the Hurricane Harvey State Mitigation Competition “discriminated on the basis of race</p>		

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				<p>and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.” In other words, the State Mitigation Competition awards were based on a set of criteria that discriminated against Texans on the basis of race, color, and national origin; H-GAC’s failure to account for previous discriminatory allocations in its MOD perpetuates that discrimination and is in itself discriminatory.</p> <p>H-GAC’s decision to exclude Harris County, where 72% of the region’s people of color live, from its MOD on the basis that Harris County was receiving other CDBG-MIT funding but allowing other jurisdictions who had received CDBG-MIT funding based on a discriminatory allocation process to receive MOD allocations is particularly egregious. However, the fact that the MOD does not account for previous discriminatory allocations resulting from the entire State Mitigation Competition program means that H-GAC’s MOD also discriminates against H-GAC residents who live outside of Harris County on the basis of race, color, and national origin.</p> <p>II. H-GAC’s MOD is Discriminatory on the Basis of Race, Color, and National Origin</p> <p>Title VI of the Civil Rights Act of 1964 mandates that “[n]o 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 be subjected to discrimination under any program or activity receiving Federal financial assistance.” Similarly, Section 109 prohibits discrimination the basis of race, color, national origin, religion, or sex in “any program or activity funded [under the Housing and Community Development Act of 1974.]” The Fair Housing Act not only prohibits discrimination but requires all entities administering housing and community development funds - including</p>		

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				<p>CDBG-DR and CDBG-MIT funds- to do so “in a manner to affirmatively further [fair housing].”</p> <p>Both the exclusion of Harris County from the MOD and the MOD itself subject H-GAC residents to discrimination on the basis of race, color, and national origin and violate the Fair Housing Act.</p> <p>On March 4, 2022, HUD issued a Letter of Finding Noncompliance with Title VI and Section 109 (Case No. 06-21-1483). HUD found that the General Land Office’s (GLO) design and operation of the Hurricane Harvey State Mitigation Competition “discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.”</p> <p>TABLE 2 - See attached correspondence</p> <p>Table 2: Demographic Breakdown of Counties within H-GAC</p> <p>As laid out in Section I of these comments, the exclusion of Harris County from the H-GAC MOD is unjustified and contravenes the purpose of the CDBG-MIT program to address the greatest mitigation needs, focusing benefits on LMI residents, as well as discriminating against residents of Harris County on the basis of race, color, and national origin.</p> <p>III. H-GAC Chose Allocation Distribution Factors and Weighting that Do Not Address the Greatest Mitigation Needs or Ensure Primary Benefit to LMI Residents</p> <p>In addition to H-GAC’s decisions about which jurisdictions would be eligible for a MOD allocation, the COG’s MOD allocation formula itself does not distribute funding consistent with the purposes of the CDBG-MIT program and the State Action Plan.</p>		

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				<p>H-GAC’s formula used four equally weighted distribution factors: households impacted; personal and real property damage; low- to moderate-income population; and, population within Floodplain (floodway, 100-year floodplain, and 500-year floodplain).</p> <p>A. Households Impacted</p> <p>H-GAC should be using the number of FEMA registrants rather than approved FEMA Individual Assistance applications. Overall, FEMA’s denial rates after Hurricane Harvey were extraordinarily high. Denial rates are particularly high for lower-income households. Applicant households earning more than \$70,000/year were rejected for individual assistance only 10% of the time while applicants earning less than \$15,000/year were denied 46% of the time. This statistic does not reflect varying degrees of damage but rather varying degrees of access to the program and resources to navigate the bureaucratic hurdles, as well as subjective assessments by FEMA inspectors, many of whom had minimal training. FEMA not also routinely denies assistance applications of nonwhite and low-income survivors at dramatically higher rates than those of well-off white applicants, it provides substantially fewer disaster recovery resources to lower-income survivors and survivors of color. Following Hurricane Harvey in 2017, white residents of higher income neighborhoods received, on average \$60,000 of assistance, while black residents in low-income neighborhoods received, on average \$84.</p> <p>B. Personal and Real Property Damage</p> <p>FEMA’s own National Advisory Council, chaired by Texas Department of Emergency Management Chief Nim Kidd, found that:</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

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				<p>[M]any FEMA programs do not consider the principle of equity in financial assistance relief. Damage assessments are based on property ownership, which immediately focuses on the wealthier parts of a community, and disadvantages renters and the homeless population. The Public Assistance Program most benefits communities that can afford to pay the required match and can navigate the complexities of the contracting agencies. The Individual Assistance Program is more accessible to those with time, income, and access.<sup>20</sup> (emphasis added)</p> <p>H-GAC should not use of distribution factor that is based on property value.</p> <p>The MOD allocation formula must account for the fact that FEMA damage amount data also undercounts damage to both lower-income renters and homeowners. If FEMA inspectors make a subjective assessment that a renter’s personal property was not worth \$2000 or that damages to a home were not worth at least \$8000 or attribute a building’s condition to “deferred maintenance” rather than storm damage - these disaster survivors are not included in FEMA data. Low FEMA damage assessments may not reflect less damage so much as the socioeconomic status of the neighborhood; wealthier communities will prima facie have higher property values and hence higher recorded damage. Lower-income people and communities have, by definition, lower value properties, a higher proportion of renters, and they receive fewer investments in public infrastructure. Nationally, in counties with major disasters (areas with at least \$10 billion in damages), white communities gained an average \$126,000 in wealth following the damage and recovery efforts. Communities of color lost up to \$29,000 on average in personal wealth following events like hurricanes and wildfires.<sup>21</sup> By relying on damage to property as a distribution metric, the HGAC MOD will shift</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>CDBG-MIT resources towards higher-income areas, and potentially have a disparate impact on Black and Hispanic-Latino residents.</p> <p>C. Low-to-Moderate Income Population</p> <p>By providing equal weight to the LMI measure, which favors lower-income areas, and the FEMA Real and Personal Property Damage measures, which favors higher-income areas, HGAC may have set up an equation that is neutral on economic factors and does not prioritize the protection of LMI individuals as required by Federal law and the Federal Register Notice allocating these funds. Low-income families face additional barriers to disaster recovery, so HGAC must either provide a higher weight to the LMI distribution factor or add a supplementary factor that will ensure equitable distribution of CDBG-MIT funds, for example, the Social Vulnerability Index (SVI).<sup>22</sup></p> <p>Applying the Social Vulnerability Index to the HGAC region at the census tract level reveals that the majority of extremely vulnerable areas (defined here as having an SVI score of greater than 0.8) are located within Harris County (see Appendix Figure 1). Over one million people reside in the 207 extremely vulnerable census tracts in Harris County and approximately 200,000 people live in the 31 extremely vulnerable census tracts in HGAC outside of Harris County. Again, even excluding Harris County, CDBG-MIT funds may not be allocated to prioritize the most impacted and distressed areas where vulnerable populations live. The Social Vulnerability Index is the best metric available for assessing disaster vulnerability and should be included in the HGAC MOD.</p> <p>IV. Inadequate Public Process</p> <p>HGAC did not provide adequate time for public</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>participation prior to the drafting of this MOD. HGAC only provided one week of notice about the Public Planning Meeting on February 3rd, 2022. Following the Public Planning Meeting, the public was only given 24 hours to provide written comment. Several attendees of the February 3rd meeting, including representatives from the City of Kendleton and nonprofits like Connective, noted that they had only heard about the meeting on the day of the meeting. HGAC failed to provide information on the distribution factors being considered prior to the meeting, so the public did not have sufficient information to draft comments prior to February 3rd. The CDBG-MIT MOD is a highly technical process and therefore the general public requires more than a single day to process and respond to proposed MOD factors. A public comment period of less than 24 hours is unreasonable and denies the public the opportunity to make informed and meaningful comment on the development of a MOD that will distribute almost half a billion dollars in federal mitigation funding.</p> <p>V. H-GAC Should Not Have Requested Waivers of Program Requirements</p> <p>The Regional MOD Program requirements set out in Action Plan Amendment 1 were designed to ensure that CDBG-MIT were used in accordance with the appropriating legislation and FR Notice and should not be waived. For the reasons set out below, H-GAC should not have requested waivers of program requirements. Further, these waivers should not have been requested without public notice and an opportunity for the public to review the justification for these waiver requests and provide comment.</p> <p>A. Minimum Threshold Waiver</p> <p>HGAC should not have requested a waiver of the \$1</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>million minimum grant amount and GLO should not have approved that waiver. CDBG-MIT funding is not an additional pot of CDBG-DR funds, but a new source of funding intended to support, as the State’s Action Plan states, “regional investments with regional impacts in risk reduction”. Even if these funds are distributed to local grantees, CDBG-MIT grants should be prioritized for larger-scale projects that mitigate risks to as many households as possible. The \$1 million minimum grant amount is itself too low; the \$3 million threshold for the State Grant Competition is a more appropriate minimum grant amount and in accordance with our previous comments on the State Action Plan, we do not believe that threshold should have been reduced from \$5 million to \$3 million.</p> <p>Congress and HUD also emphasized that CDBG–MIT funds should be used “to carry out strategic and high-impact activities to mitigate disaster risks and reduce future losses.”<sup>23</sup> The MOD process generally, which is designed to suballocate funds to individual jurisdictions without consideration of the most effective and strategic use of those funds, contravenes the intent of the CDBG-MIT appropriation; providing individual jurisdictions with small grants that forces them to propose projects prioritized by price and compete against other jurisdictions rather making large-scale strategic regional investments frustrates the goal of effective large- scale mitigation.</p> <p>B. Low-to-Moderate-Income Threshold Waiver</p> <p>GLO’s decision not to grant H-GAC’s request for a waiver of the LMI threshold for CDBG-MIT was correct, and H-GAC should not have requested such a waiver in the first place. HUD has already provided a waiver that reduces the LMI threshold from 70% to 50%. CDBG-MIT funds are not merely another source of potential funding for mitigation projects, “CDBG-MIT grants have a statutory focus on</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>benefitting vulnerable lower-income people and communities and targeting the most impacted and distressed areas.”</p> <p>“Disasters are often depicted as great levelers, victimizing rich and poor alike. The effects of disasters on populations are anything but random... The disaster vulnerability of individuals and groups is associated with a number of socioeconomic factors that include income, poverty, and social class; race, ethnicity, and culture; physical ability and disability; language competency; social networks and social capital; gender; household composition; homeownership; and age... The same factors that disadvantage members of society on a daily basis also play out during disasters.”</p> <p>Pre-existing disparities in infrastructure, storm protection, and geographic and social vulnerability are exacerbated by disasters, and response and recovery programs, policies, and activities that do not affirmatively address these disproportionate impacts perpetuate inequity and increase the vulnerability of underserved groups and communities .26 Homes in formerly redlined neighborhoods, for example, are at higher risk of flooding than homes in historically greenlined neighborhoods seven decades after the HOLC redlining maps were created.27 To the extent LMI status is correlated with protected class status under Title VI, Section 109, and the Fair Housing Act, reducing the benefit to these communities may also violate civil rights law.</p> <p>Please don’t hesitate to contact us if you have questions or concerns about our comments.</p> <p>Sincerely, Madison Sloan Director of Disaster Recovery and Fair Housing Meg Duffy</p>		

## Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>Policy Analyst Texas Appleseed msloan@texasappleseed.org</p> <p>Ayanna Jolivet McCloud Executive Director Bayou City Water Keeper</p>		
7/28/2022	Email	William H. "Dusty" Thiele	Mayor	<p>See Correspondence 10 7-28-22 - Thiele</p> <p>To Whom It May Concern,</p> <p>Please allow this letter to serve as an official comment from the City of Katy ("City") regarding the Community Development Block Grant - Mitigation ("CD BG-MIT") Method of Distribution ("MOD") in the Houston-Galveston Area Council ("H-GAC").</p> <p>The City appreciates the opportunity to receive funding through the CDBG-MIT Regional Mitigation Program. We are seeking clarification on the use of funds as we prepare a list of potential projects that could benefit from this regional mitigation program.</p> <ul style="list-style-type: none"> <li>• With the City being split into multiple counties, how will the funds be split between Fort Bend County and Waller County?</li> <li>• Can the City use all of the allocated funds towards an urgent need project or will the City be required to meet the low-to-moderate income requirements? The City has urgent need projects that would be great to pursue with these funds.</li> </ul> <p>The City is excited to take the next steps to mitigate the impact of future disasters on our community.</p> <p>Sincerely William H. "Dusty" Thiele Mayor</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). The MOD does not restrict the City from expending its allocation within its jurisdiction as it sees fit, excluding areas within Harris County, subject to approval and any applicable restrictions from the GLO. The MOD requires each entity receiving an allocation to affirm they will use at least 50% of their funds on projects whose area of benefit includes at least 51% low-to-moderate-income individuals. There are currently no opportunities for variances from this requirement.</p>	None
7/28/2022	Email	Lizzie Fletcher, Sylvia Garcia, All Green	Representatives Fletcher, Green, and Garcia	<p>See Correspondence 12 7-28-22-Fletcher-Garcia-Green</p> <p>Dear Members of the Houston-Galveston Area Council</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region.</p>	None

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>Board:</p> <p>We welcome the opportunity to submit comments on the Houston-Galveston Area Council (H-GAC) Community Development Block Grant-Mitigation (CDBG-MIT) Method of Distribution (MOD). The funds in this MOD, which were appropriated by Congress, will reduce the risk of future flooding in the regions most impacted by significant rain events in 2015, 2016, and 2017, including Hurricane Harvey. It is an important step in addressing our disaster mitigation needs, and we thank you for your commitment to supporting Texas communities in our region.</p> <p>As you know, Hurricane Harvey devastated the Gulf Coast region in 2017, its nearly 60 inches of rain and related flooding claiming 68 lives and causing an estimated \$125 billion in damage. This destructive storm was the third in three years, following significant rain events in 2015 and 2016 in Houston and Harris County, the Memorial Day and Tax Day floods. Harris County, the most populous county in Texas, is the only county in Texas that the U.S. Department of Housing and Urban Development (HUD) identified as “most impacted and distressed” from the Memorial Day flood in 2015, the Tax Day flood in 2016, and Hurricane Harvey in 2017.</p> <p>The U.S. Congress passed the Bipartisan Budget Act of 2018 (BBA) shortly after Hurricane Harvey and appropriated \$12 billion in CDBG-MIT funding for hazard mitigation activities in response to qualifying disasters in 2015, 2016, and 2017, including Hurricane Harvey. Congress intended these funds to be used to mitigate future risk in the areas most impacted by these disasters. The BBA is clear that areas that received the most CDBG Disaster Recovery (CDBG-DR) funds should receive the most CDBG-MIT funds to mitigate damages and lessen the need for CDBG-DR funding in the future.</p>	<p>(For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board’s anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>After seeing the results of the H-GAC board’s vote in February, we are concerned that the decision to allocate only \$9.2 million to the City of Houston will fail the communities most impacted by Harvey and prior storms and leave those communities even more vulnerable to future disasters. This proposed allocation denies the intent of the Congress that appropriated the funds and leaves the City of Houston, which makes up 30% of the region’s population and almost 50% of the damages from Hurricane Harvey, with approximately 2% of H-GAC’s available funds. We are further concerned by the board’s discussions to deny H-GAC funding to any cities within Harris County if the Texas General Land Office’s (GLO) Action Plan Amendment 1, which awards \$750 million to Harris County, is approved.</p> <p>As you know, Action Plan Amendment 1 proposes an allocation of \$750 million in CDBG-MIT funds for Harris County to distribute to flood and drainage districts and municipalities within their jurisdiction, including the City of Houston. Because Harris County and Houston were not awarded any funds in GLO’s \$2.3 billion funding competition, this proposed allocation will be the sole direct funding source for our local governments to complete mitigation projects in Houston and Harris County.</p> <p>This proposed subgrant of less than \$750 million is not sufficient for the communities in Houston and the damage they faced during Hurricane Harvey and the floods in 2015 and 2016. Furthermore, because this plan has not yet been approved by HUD, there is no guarantee these funds will ever get to Harris County or the City of Houston. Without approval of this plan and a method of distribution with which Harris County will allocate those funds, it is not a responsible approach for H-GAC to consider reducing the</p>		

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>current allocation to zero.</p> <p>On behalf of our constituents, and having consulted local leaders and experts, we ask H-GAC to award funds to the City of Houston based on Congressional intent, focusing on the regions most impacted by the flooding in 2015, 2016, and 2017. There is no reason the City of Houston should receive only 2% of available funds after suffering nearly 50% of damages.</p> <p>We urge H-GAC to take these considerations into account as the MOD is being developed. We also ask that H-GAC work with local leaders to make data-driven changes to this MOD so that it more accurately reflects the disproportionate damage Houston has faced in recent years. We look forward to working with you to ensure that Houston receives a fair and appropriate allocation of these funds.</p> <p>Sincerely, Lizzie Fletcher, Sylvia Garcia, Al Green, Members of Congress"</p>		
7/28/2022	Email	Rep. Al Green, Rep. Sheila Jackson Lee, and Rep. Sylvia Garcia	Congress	<p>See Correspondence 16 7-28-22-Green-Jackson Lee-Garcia</p> <p>Dear Members of the Houston-Galveston Area Council (H-GAC) Board,</p> <p>Thank you for holding a public hearing on the Method of Distribution of Community Development Block Grant-Mitigation (CDBG-MIT) funds for flood risk mitigation projects.</p> <p>We join Council Member Alcorn and Mayor Turner in opposition to the H-GAC's decision to award the City of Houston less than 2% of the total CDBG-MIT funds allocated for the Council. When Congress appropriated \$4.3 billion in CDBG-MIT funds for disaster relief in the wake of Hurricane Harvey, these funds were meant to be</p>	<p>Thank you for providing public comment on the Method of Distribution for Community Development Block Grant-Mitigation funds in the Houston-Galveston region. (For ease of reference, your comment is copied at the end of this email.) We provided your comments to the H-GAC Board of Directors for their consideration prior to the Board's anticipated action on August 16, 2022 to submit a final Method of Distribution (MOD) to the Texas General Land Office (GLO). We also encourage you to share your comments and needs with Harris County as they seek public input during the development of their Method of Distribution for their direct allocation of \$750 million in Community Development Block Grant – Mitigation funds for the county and cities therein. You can find more information on their program at <a href="https://harrisrecovery.org/cdbg-mitigation/">https://harrisrecovery.org/cdbg-mitigation/</a>.</p>	

Houston-Galveston Area Council Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution of Funds – Public Comments and Draft Responses

Date Received	Method	Name	Role/Title	Comment	Response	Associated changes to MOD
				<p>distributed in an equitable manner to the most impacted communities. While the General Land Office’s (GLO) funding allocation formula created an unjust and inequitable distribution, the H-GAC Board’s decision to allocate so few resources to the City of Houston only compounds this injustice.</p> <p>Some Board members cited the GLO’s allocation of \$750 million to Harris County as a reason not to provide further funds for the City of Houston, as it lies within the county. The notion that, because some funds are going to Harris County, the City of Houston should not receive further assistance is groundless. Harris County is the only county in Texas to have experienced three consecutive years of flooding disasters, in 2015, 2016, and 2017. When Hurricane Harvey struck, Harris County was inundated with 1 trillion gallons of water in just four days.</p> <p>The City of Houston desperately needs disaster relief funds to build infrastructure that can lessen the impact of flooding disasters. Unless additional CDBG-MIT funds are distributed to the City of Houston, we will neither be able to repair the damage inflicted by consecutive flooding disasters and Hurricane Harvey nor will we be able to prepare for future catastrophes. The City of Houston and Harris County require as much relief funding as they can receive.</p> <p>We urge you to reconsider this Method of Distribution. Thank you for your attention to this crucial matter. Should you have any additional questions, please do not hesitate to contact Rep. Al Green’s Chief of Staff, Niha Razi, at 202-760-1809 or niha.razi@mail.house.gov.</p> <p>/s/Al Green, Member of Congress /s/ Sheila Jackson Lee, Member of Congress /s/ Sylvia Garcia, Member of Congress</p>		



FROM THE OFFICE OF THE MAYOR  
**LAURIE B. KINCANNON**  
Email: [kincannonlaurie@gmail.com](mailto:kincannonlaurie@gmail.com)

P.O. Box 487  
512 E. Brazos Avenue  
West Columbia TX 77486

Phone (979) 345-3123  
Fax (979) 345-3178  
[www.westcolumbiatx.org](http://www.westcolumbiatx.org)

June 30, 2022

Dear H-GAC:

Thank you for providing an opportunity for the City of West Columbia – “The First Capitol of the Republic of Texas” to comment on the method of distribution for regional mitigation funds.

The city spent considerable monies and staff time preparing our Round 1 application. Our five-million-dollar request scored 76.98 - 1.02 points below the last funded request. (78.00)

The city respectfully suggests that H-GAC review the applications previously submitted to the GLO that remain unfunded in Round 1. The time delay incurred by this new distribution is a huge waste of time and money. In addition, the rising cost of construction due to the freeze and COVID-19 could have been avoided. Our cities could have greatly benefitted from a faster response to our citizens' needs.

Respectfully submitted,



Laurie B. Kincannon



**Kevin Cole, Mayor**  
**City of Pearland**  
3519 Liberty Drive  
Pearland, Texas 77581  
Tel: 281.652.1780  
pearlandtx.gov

July 15, 2022

Cheryl Mergo  
Houston-Galveston Area Council  
3555 Timmons Lane, Suite 100  
Houston, TX 77027

Dear Cheryl:

**RE: CDBG-MIT "Round 2" Method of Distribution**

Since 1997, major storms and hurricanes have caused millions in damages to residences, commercial buildings, public facilities and infrastructure, and private property in the City of Pearland. Hurricane Harvey, alone, impacted residences and public property to the tune of \$28.9 million, mostly due to flood-related causes.

As a result of the impacts of these disasters, flood mitigation maintains its status as a major priority in Pearland as we continue to plan for the implementation of strategies to improve our local drainage and stormwater management capacity. Our current 2019-updated Master Drainage Plan contains hundreds of millions in projects that City-led and/or Brazoria Drainage District (No . 4) efforts could be used to resolve local problems, but funding is not available.

Therefore, the City of Pearland supports HGAC's proposed Method of Distribution (MOD) of GLO-administered CDBG-MIT "Round 2" funding proposed by the Water Resources Committee, which proposes to provide the City of Pearland with \$14,008,900. Having said that, there are some key elements of concern that I feel must be clarified and/or instituted as the process moves forward:


- Appropriation by Jurisdiction: There are 11 cities within the HGAC region that are located in at least two (2) counties, three (3) of which are located in three (3) counties. Pearland being one of these (Brazoria - primary, Fort Bend, and Harris), there is a concern as to whether or not cities like ours will have to allocate funds to projects according to their location by county. There should be clarification included in the process that determines if allocated funds need to be spent according to their appropriation by county.
- Low-Moderate Income: Due to the preliminary allocation of GLO CDBG-Mitigation funds to certain projects prior to this Method of Distribution, clarification needs to be provided as to the LMI requirements, as that initial allocation may have the impact of adjusting the required LMI percentage on the basis of how those projects impact the overall LMI for the region.

- Period of Performance: How long will the period of performance be for using these funds?
- Redistribution of Unspent Funds - Balance of Region: All subrecipients/subawardees may not be able to spend these funds appropriately, if at all. Clarification needs to be provided as to how the MOD will accommodate redistribution of unspent funds to viable, eligible projects elsewhere in the region. This was a major issue in the aftermath of Hurricane Ike.
- Matching Funds: Clarification needs to be provided on how these funds can be used in concert with other federal and/or local matching funds (ARPA, FEMA, local bonds, etc...).
- Administration: Clarification needs to be provided on how the program will be administered. Will these funds be handled entirely by HGAC for its administrative oversight and management program-wide? OR, will the GLO be the administrative agency? Will subrecipient/subaward entities need to submit project applications to secure funds? When will those parameters be made available?
- Mitigation vs Disaster Recovery: Clarification needs to be provided on the types of projects that are eligible for use of these funds. There are characteristics of a mitigation project vs a disaster recovery project that can make the latter definitively ineligible for consideration.
- HUD Exception Criteria: Existing HUD Entitlement Jurisdictions that have fewer than one-quarter of their Census block groups with 51% or more low- and moderate-income persons, do not have to meet the area-benefit requirement that 51% or more low-moderate income persons reside in the "service area" of an applicable project. **Clarification needs to be made as to how these exception criteria values will be incorporated into the local requirements for these jurisdictions in meeting LMI requirements AND to the extent these have been included in the MOD.** The table below shows the HUD Exception Criteria Grantees located in the HGAC region. It may be of note that Sugar Land, prior to its decision to release itself from its Entitlement Jurisdiction status, was one of these entities and may still fall within the technical parameters called for when determining Exception Criteria status if included in this MOD.

American Community Survey 5-Year 2011-2015 Low and Moderate Income Summary Data (HUD FY21)							
CDBGUOGID	CDBGNAME	STUSAB	CDBGTY	LOWMOD	LOWMODUNIV	LOWMODPCT	Top Quartile (FY21)
483084	League City	TX	Metro City	19,020	91,205	20.85%	37.73%
483512	Missouri City	TX	Metro City	16,130	70,260	22.96%	43.93%
484080	Pearland	TX	Metro City	23,905	101,265	23.61%	45.00%
489157	Fort Bend County	TX	Urban County	139,585	540,900	25.81%	45.93%
489339	Montgomery County	TX	Urban County	131,730	407,350	32.34%	50.06%

On behalf of Pearland, I believe these comments and questions are important enough to drive the need for clarification, so our community and others can proceed accordingly when deciding how best to use these funds. The Pearland community will continue to be involved and invested in regional planning efforts and I look forward to an outcome that can support substantive flood-mitigation projects in our city.

Sincerely,

  
Kevin Cole, Mayor  
City of Pearland

July 12, 2022

HGAC MAILROOM

2022 JUL 15 PM 1:26

Houston-Galveston Area Council

h-gac.com

CDBGMitigation@h-gac.com

Attention Please: Ms. Cheryl Mergo

Post Office Box 22777

Houston, Texas 77227-2777

3555 Timmons Lane

Houston, Texas

77027

Re: \$488,762,000 {nearly .5 a billion dollars}

Final Method of Distribution Submitted to the Texas  
General Land Commission

Dear Ladies and Gentlemen:

On Monday July 11, 2022 I, Mr. Haywood Mack Ross, visited the offices of the Houston-Galveston Area Council on Timmons Lane responding to a local Wharton papers "Solicitation for Public Comment."

Upon arriving at the (H-GAC) office on Timmons I was ignored for a significant amount of time. I noticed a Black Lady and a rather large man supposedly working. After awhile a White young man showed up with necktie on and we went to a separate room and actually talk about nothing. My interest was

would a portion of \$488,762,000 be used for housing which was never definitively addressed and this executive had no business cards; consequently I have no recall of who he is.

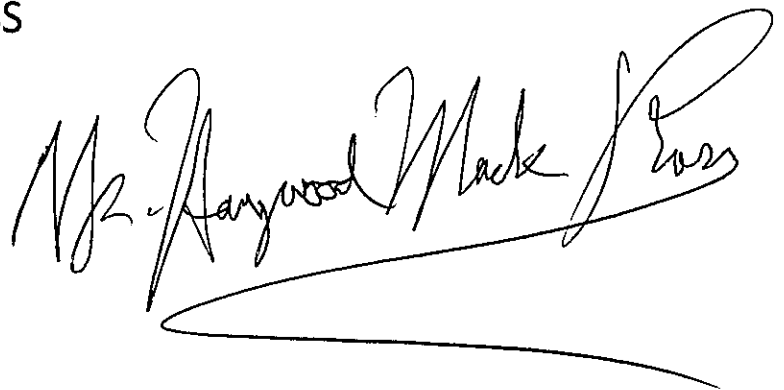
Frankly, since of course I am Black, I am rather sensitive to the fact we came to no significant conclusion whatsoever making my efforts and expense of no use, and no account.

I do hereby request, please, that I be kept informed of all initiatives proposed by the Houston-Galveston Area Council.

Your prompt and deliberate cooperation will be immensely and tremendously appreciated.

Thank you very much!

Mr. HAYWOOD MACK ROSS  
517 BLACK STREET  
POST OFFICE BOX #2  
WHARTON, TEXAS  
77488  
[979]253-4893

A handwritten signature in black ink, reading "Mr. Haywood Mack Ross". The signature is written in a cursive, flowing style. Below the signature is a long, horizontal, slightly wavy line that extends across the width of the signature.

### Solicitation for Public Comment

Houston-Galveston Area Council (H-GAC) is seeking input on a conditionally approved Method of Distribution (MOD) for \$488,762,000 in Community Development Block Grant (CDBG) Mitigation funds to provide funds to counties and local jurisdictions for risk mitigation projects related to flooding, hurricanes, and other natural disasters.

The conditionally approved Method of Distribution (MOD) is available online at [www.h-gac.com/go/cdbg](http://www.h-gac.com/go/cdbg)

H-GAC staff will accept public comment on the MOD during the public comment period as listed below and during a public hearing on Thursday, July 21, 2022, from 5:30 p.m. to 7:30 p.m. 07-21

You may submit oral and written comments on the conditionally approved MOD until Thursday, July 28, 2022, at 5 p.m. To submit a comment, you may: 07-28

- Email public comments to: [CDBGMitigation@h-gac.com](mailto:CDBGMitigation@h-gac.com)
- Make public comments by phone at 1-877-442-2777
- Mail public comments to Houston-Galveston Area Council, Attn: Cheryl Mergo, P.O. Box 22777, Houston, TX 77227-2777
- Deliver written public comments to the Houston-Galveston Area Council, 3555 Timmons Lane, Suite 100, Houston, Texas 77027 !
- Make public comments using a form available online at [www.h-gac.com/go/cdbg](http://www.h-gac.com/go/cdbg)
- Make public comments at a public hearing (details below)

H-GAC staff will host an information meeting to provide an overview of the conditionally approved MOD, including information about data used in its development. The meeting will be Thursday, July 14, 2022, from 5:30 p.m. to 7:30 p.m. 07-14

The informational meeting will be held on Zoom. The registration link for the informational meeting is available on H-GAC's calendar of events at [www.h-gac.com/calendar](http://www.h-gac.com/calendar). ZOOM!

In addition to the methods listed above, H-GAC will also accept oral and written comments related to the MOD during a public hearing on Thursday, July 21, 2022, from 5:30 p.m. to 7:30 p.m. 07-21

The hearing will be held in person at 3555 Timmons Lane, Houston, Texas, second floor conference room, and on Zoom. The registration link for the public hearing is available on H-GAC's calendar of events at [h-gac.com/calendar](http://h-gac.com/calendar). WHERE

After receiving input from the public, H-GAC will prepare and submit a Final MOD to the Texas General Land Office for approval. !

For more information on the conditionally approved MOD, please visit: [www.h-gac.com/go/cdbg](http://www.h-gac.com/go/cdbg)

The public hearing will be conducted in English, and an American Sign Language interpreter will be provided for the hearing impaired. Spanish, Mandarin, and Vietnamese interpreters will be available throughout the meeting. Persons needing to arrange ADA accommodations or language interpreters for the upcoming online public planning meetings may call 713-499-6658 or email [Ashley.Seals@h-gac.com](mailto:Ashley.Seals@h-gac.com) within 48 hours of the event with your accommodation requests.

cdbgmitigation@h-gac.com

July 12, 2022

Houston-Galveston Area Council

h-gac.com

CDBGMitigation@h-gac.com

Attention Please: Ms. Cheryl Mergo

Post Office Box 22777

Houston, Texas 77227-2777

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77027

Re: \$488,762,000 {nearly .5 a billion dollars}

Final Method of Distribution Submitted to the Texas  
General Land Commission

Dear Ladies and Gentlemen:

On Monday July 11, 2022 I, Mr. Haywood Mack Ross, visited the offices of the Houston-Galveston Area Council on Timmons Lane responding to a local Wharton papers "Solicitation for Public Comment."

Upon arriving at the (H-GAC) office on Timmons I was ignored for a significant amount of time. I noticed a Black Lady and a rather large man supposedly working. After awhile a White young man showed up with necktie on and we went to a separate room and actually talk about nothing. My interest was

would a portion of \$488,762,000 be used for housing which was never definitively addressed and this executive had no business cards; consequently I have no recall of who he is.

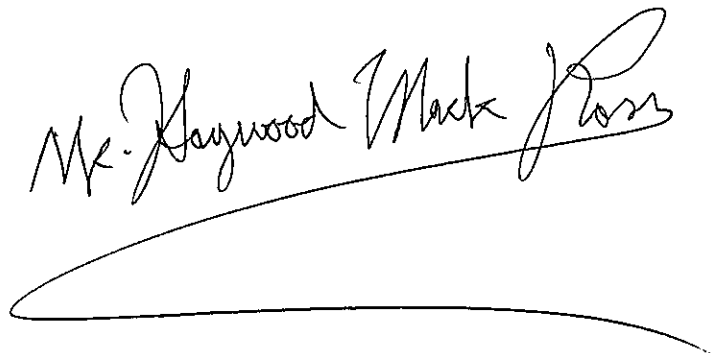
Frankly, since of course I am Black, I am rather sensitive to the fact we came to no significant conclusion whatsoever making my efforts and expense of no use, and no account.

I do hereby request, please, that I be kept informed of all initiatives proposed by the Houston-Galveston Area Council.

Your prompt and deliberate cooperation will be immensely and tremendously appreciated.

Thank you very much!

Mr. HAYWOOD MACK ROSS  
517 BLACK STREET  
POST OFFICE BOX #2  
WHARTON, TEXAS  
77488  
[979]253-4893

A handwritten signature in cursive script that reads "Mr. Haywood Mack Ross". The signature is written in dark ink and is positioned above a long, horizontal, slightly curved line that spans the width of the signature.



## Texas Administrative Code

### TITLE 40

### SOCIAL SERVICES AND ASSISTANCE

#### Parts

<u>PART 1</u>	<u>DEPARTMENT OF AGING AND DISABILITY SERVICES</u>
<u>PART 2</u>	<u>DEPARTMENT OF ASSISTIVE AND REHABILITATIVE SERVICES</u>
<u>PART 5</u>	<u>TEXAS VETERANS LAND BOARD</u>
<u>PART 12</u>	<u>TEXAS BOARD OF OCCUPATIONAL THERAPY EXAMINERS</u>
<u>PART 15</u>	<u>TEXAS VETERANS COMMISSION</u>
<u>PART 17</u>	<u>STATE PENSION REVIEW BOARD</u>
<u>PART 19</u>	<u>DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES</u>
<u>PART 20</u>	<u>TEXAS WORKFORCE COMMISSION</u>
<u>PART 21</u>	<u>TEXAS COUNCIL FOR DEVELOPMENTAL DISABILITIES</u>
<u>PART 22</u>	<u>TEXAS WORKFORCE INVESTMENT COUNCIL</u>

[HOME](#)[TEXAS REGISTER](#)[TEXAS ADMINISTRATIVE CODE](#)[OPEN MEETINGS](#)

PART ONE - MR. HAYWOOD MACK ROSS IS 74 YEARS AND DISABLED  
PART TWO - MR. ROSS DISABLED WITH DEPRESSION AND PHYSICAL DISABILITY  
PART THREE - HAS IT DEFINITELY HELPED ANY VETERAN  
PART TWELVE - NO HELP  
PART FIFTEEN - NO HELP  
PART NINETEEN - NO HELP  
PART TWENTY - OF COURSE, NO HELP  
PART TWENTY ONE - NO HELP  
PART TWENTY TWO - INVESTMENT FOR THE COMMON NEGRO, PLEASE!



**KARLA CISNEROS**  
Houston City Council Member, District H

July 21, 2022

Dear Board Members,

As the City Council Member for District H in the City of Houston, I am writing to urge reasonableness and to voice my deep concern and opposition to the current recommendation that severely underfunds low- and moderate-income residents of Houston.

The proposed MOD for the \$488 million in funds to address flooding is unfair and is a severe blow to the exact communities that these Community Development Block Grant-Mitigation funds were designed to help. Adoption of this recommendation compounds the very harmful impact of the decision in February of this year to only award 1.9% of the Texas GLO funding to the City of Houston, when almost **one third** of the H-GAC's population falls within the City of Houston. And despite the funding that was allocated to Harris County, it still remains to be seen what portion of that award to Harris County last February, will be invested in the City of Houston.

Please reconsider the formula and adopt a Method of Distribution that fairly, responsibly, and equitably serves all those who are desperately in need of assistance for flooding mitigation, even if they live in Houston.

Sincerely,

A handwritten signature in black ink that reads "Karla Cisneros".

Karla Cisneros  
Council Member, District H

SYLVIA R. GARCIA

29TH DISTRICT, TEXAS

1620 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-1688

11811 EAST FREEWAY  
SUITE 430  
HOUSTON, TX 77029  
(832) 325-3150

FACEBOOK: @REPSYLVIA GARCIA

TWITTER: @REPSYLVIA GARCIA

WWW.SYLVIA GARCIA.HOUSE.GOV

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-4329**

HOUSE COMMITTEE ON FINANCIAL SERVICES

SUBCOMMITTEE ON DIVERSITY  
AND INCLUSION

SUBCOMMITTEE ON OVERSIGHT  
AND INVESTIGATIONS

TASK FORCE ON ARTIFICIAL INTELLIGENCE

HOUSE COMMITTEE ON THE JUDICIARY

SUBCOMMITTEE ON THE CONSTITUTION,  
CIVIL RIGHTS, AND CIVIL LIBERTIES

SUBCOMMITTEE ON IMMIGRATION  
AND CITIZENSHIP

TASK FORCE ON POVERTY AND OPPORTUNITY

VICE CHAIR ON URBAN POVERTY

Houston-Galveston Area Council Board of Directors  
3555 Timmons Lane #100  
Houston, TX 77027

Dear H-GAC Board of Directors,

I am glad to have the opportunity to offer my comments on the flow of Community Development Block Grant – Mitigation (CDBG-MIT) funds in Houston. The need for flood relief is a difficult reality for too many Houstonians. I implore the Houston-Galveston Area Council (H-GAC) to allocate a fair and equitable proportion of CDBG-MIT dollars to the City of Houston to offer much-needed assistance to its residents, some who live in my Congressional District.

For context, in 2018, Congress appropriated \$12 Billion in CDBG-MIT funds for qualifying disasters from 2015, 2016, and 2017. Hurricane Harvey is one of these qualifying disasters, and the State of Texas received a lump sum of these dollars to be distributed by the Texas General Land Office (GLO). In turn, the GLO allocated \$488,762,000 CDBG-MIT Regional Mitigation Program funds to the H-GAC region.

In February 2022, the H-GAC board voted to award just \$9,232,700, or 1.9% of the total dollars to the city of Houston. This allocation is meager compared to the need of the most damaged area.

The City of Houston makes up 30% of H-GAC's region's population. And, over 300,000 housing units flooded in Houston alone, with more homes impacted than after both Hurricane Katrina and Hurricane Sandy. It is clear that such a large portion of the region with such widespread flood damage deserves more than a mere 1.9% of H-GAC's allotted funds. Further, Harris County's method of distribution is still incomplete, meaning the City of Houston is still left in the dark regarding how much money they may receive from the County.

As a Member of the United States House of Representatives, it is my duty to stand up for the needs of my constituents. In more ways than one, the City of Houston has been left behind in essential flood relief. I call upon H-GAC to reconsider their method of distribution and provide the City of Houston with a larger portion of its CDBG-MIT funds. Thank you for your consideration.

Sincerely,



Sylvia Garcia  
Member of Congress



# CITY OF HOUSTON

**Sylvester Turner**

Mayor

P.O. Box 1562  
Houston, Texas 77251-1562

Telephone – Dial 311  
[www.houstontx.gov](http://www.houstontx.gov)

July 21, 2022

Dear Members of the H-GAC Board,

Thank you for the opportunity to offer comments on HGAC's proposed Method of Distribution. Before offering my own comments, I wish to thank Council Member Sallie Alcorn for her leadership not just as a member of the HGAC Board, but as an advocate for the people of Houston.

Both Council Member Alcorn and I believe that the decision by this board to continue with the current Method of Distribution that allocates to the City of Houston less than 2% of available CDBG-MIT monies will not address the needs of the people of Houston and this region.

Northeast Houston, Sunnyside, Acres Homes, the East End, and so many other communities were vulnerable during Harvey and without a sufficient allocation and investment of CDBG-MIT funds, these communities will suffer again and again with every future major flooding event.

While all of our communities were affected, those that were most severely impacted and will continue to be vulnerable are our historical communities of color. HUD has already found that GLO has discriminated against this minority population, but HGAC can stop that inequity by not following GLO's lead. We are a region, and by working together we can serve all people – no matter their color or creed.

Less than 2% of funding for a population that makes up over 30% of the HGAC region cannot stand. What meaningful infrastructure investments can we put in place with only \$9 million in a city that spans over 665 square miles and nearly 2.3 million people?

At the end of the day, let us not forget that we are talking about people, our people, not just dollars whenever we are choosing the Method of Distribution. Because yes, it is a choice. We can choose to work together to invest the funds equitably for the most impacted communities as was intended by Congress.

Sincerely,

Sylvester Turner  
Mayor



## COUNCIL MEMBER LETITIA PLUMMER DDS

Houston City Council At-Large Position 4

7/22/2022

Dear fellow H-GAC Board Members,

I urge you to reconsider the proposed Method of Distribution for the \$488 million Community Development Block Grant-Mitigation funds and work towards a method that is more equitable.

Over the last few years, I have spent a considerable amount of time with communities who have continuously suffered since Hurricane Harvey. Every episode of rain brings the risk of homes flooding in our underserved neighborhoods, where our communities of color reside. It is, therefore, extremely disappointing that the board wants to continue with the current Method of Distribution by allocating a mere 1.9% of the available CDBG-MIT funds to Houston when our city accounts for 30% of H-GAC's region.

The General Land Office has already failed these communities when it discriminated and denied them much deserved flood mitigation money. In addition, Harris County has not decided the Method of Distribution for the funding it received, which leaves the most impacted people, yet again, in a precarious situation.

I hope the board will consider the history of risks to the impacted communities and develop an equitable Method of Delivery for the CDBG-MIT funds.

Sincerely,

Council Member Letitia Plummer, DDS  
At- Large 4



July 25, 2022



**MATAGORDA COUNTY**  
**NATE McDONALD**  
COUNTY JUDGE

Houston-Galveston Area Council  
CDBG Mitigation Funds  
RE: Preliminary MOD Public Comments

H-GAC Staff and Board Members,

Please accept this writing as my public comments with regard to the preliminary Method of Distribution (MOD) for U.S. Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Mitigation funds to be provided for our region.

In that the H-GAC Water Committee and staff worked for many months to promulgate a fair and equitable MOD for the 13 counties of the H-GAC, that was debated by and approved by the elected officials who comprise the Water Committee with multiple scenario input from H-GAC staff, then sent to the full H-GAC Board of Directors, which is comprised of elected leaders from each of our region's counties, as well as elected leaders from each of our region's largest cities; my belief is that this MOD has been transparently and publicly vetted, and was approved for submittal to the TX GLO by a public vote by the majority of the H-GAC Board of Directors present at the February 15, 2022, H-GAC Board Meeting.

This MOD is the culmination of, in many cases, years of planning, studies and modeling to bring forward shovel ready projects within this entirety of our region. Most are multi-jurisdictional projects that have much benefit for both upstream and downstream partners. There are no jurisdictions who will have 100% of their mitigation needs met, but by working together as a region, we will have prioritized the biggest needs and met many of those.

As we know that Harris County received a direct appropriation of 750 million dollars and that the other twelve counties have 469 million dollars to divide between them, my belief is that Harris County has plenty of mitigation funds to spend with the cities within Harris County and that some very good projects can be accomplished in the balance of the region with the other 469 million dollars, if this MOD is given final approval by the TX GLO and HUD.

There are many more mitigation needs in our region than just those that reside in Harris County, thus I urge the TXGLO and HUD to approve this preliminary MOD as written and allow our region to access these funds and build out the mitigation projects in each of our counties. Thank you for allowing me to make these comments and please have a good day.

Best regards,

Nate McDonald  
County Judge  
Matagorda County



EDWARD POLLARD  
Houston City Council Member, District J

July 26, 2022

Dear Members of the H-GAC Board,

I am writing to express my opposition to the current Method of Distribution for the CDBG-MIT monies. Under the current MOD, the city of Houston is allocated less than 2% of the available CDBG-MIT funds. Given that Houston's population comprises over 30% of the HGAC region, 1.9% of H-GAC's funding does not sufficiently cover Houston and the surrounding region. Additionally, Harris County's MOD is unclear regarding how much funding the city will receive. This creates another obstacle towards helping the people of Houston.

During Hurricane Harvey, more than 300,000 housing units flooded across Houston. While the entire city was negatively impacted, District J communities were some of the most harmed. Minority communities are the most vulnerable to major flooding because they have been historically underfunded by the GLO and other entities. This type of discrimination against minority populations further perpetuates flood relief disparities.

Within District J, these underfunded communities include Sharpstown, Braeburn, Gulfton, Alief, Westwood, Richmond Plaza South, and St. George. These areas are still suffering from Harvey, and they require adequate investment to improve drainage and other flood reducing infrastructure. Without the necessary funding, these communities will continue to struggle following every major flooding event.

As the Council Member for District J, I must advocate for the needs of my constituents. I implore HGAC to allocate more funds to the people who need it the most. We must use the CDBG-MIT funds as they were intended and equitably invest in our communities. Thank you for your consideration, and I look forward to working together on better serving the people of Houston.

Best regards,

A handwritten signature in blue ink, appearing to read "Ed Pollard", is written over a light blue circular background.

Council Member Edward Pollard  
District J

*City of Katy*  
**OFFICE OF THE MAYOR**



July 27, 2022

Water Resource Committee  
Houston-Galveston Area Council

Re: H-GAC CDBG-MIT MOD Public Comments

To Whom It May Concern,

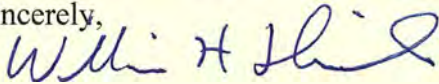
Please allow this letter to serve as an official comment from the City of Katy ("City") regarding the Community Development Block Grant – Mitigation ("CDBG-MIT") Method of Distribution ("MOD") in the Houston-Galveston Area Council ("H-GAC").

The City appreciates the opportunity to receive funding through the CDBG-MIT Regional Mitigation Program. We are seeking clarification on the use of funds as we prepare a list of potential projects that could benefit from this regional mitigation program.

- With the City being split into multiple counties, how will the funds be split between Fort Bend County and Waller County?
- Can the City use all of the allocated funds towards an urgent need project or will the City be required to meet the low-to-moderate income requirements? The City has urgent need projects that would be great to pursue with these funds.

The City is excited to take the next steps to mitigate the impact of future disasters on our community.

Sincerely,



William H. "Dusty" Thiele  
Mayor

WHD/kjs



July 28, 2022

Houston-Galveston Area Council  
3555 Timmons Lane, Suite 100  
Houston, Texas 77027

ATTN: Cheryl Mergo

Re: Public Comment  
H-GAC Method of Distribution for CDBG-MIT Funds

The purpose of this letter is to provide public comments on the Houston-Galveston Area Council's (H-GAC) draft Method of Distribution (MOD) for Community Development Block Grant-Mitigation (CDBG-MIT) funding.

In February of 2018, the United States Congress appropriated billions of dollars to mitigate the catastrophic damages of extreme weather related events for regions impacted between 2015 and 2017, including Hurricane Harvey, and Harris County is the only County in Texas to have been impacted by Presidentially declared flooding disasters in all three years.

The Texas General Land Office (GLO) received more than \$4 Billion to distribute in accordance with criteria established by Congress and the Department of Housing and Urban Development (HUD). The GLO then appropriated \$488 million to H-GAC, of which Harris County is a part of. Inexplicably, the H-GAC's draft MOD specifically excludes all agencies within the geographical limits of Harris County from any of that funding – with the exception of declined funding that may be reallocated to cities (or portions thereof) located in Harris County.

While the MOD states that the reason for this exclusion is because the GLO has separately appropriated \$750 million to Harris County, it provides no statistical measure for this exclusion and does not consider the percent of H-GAC population within Harris County identified by HUD as most impacted and distressed. For example, 73 percent of the low to moderate income population across all of H-GAC's 13 counties resides within Harris County. Further, the GLO's amended Action Plan appropriating funds to Harris County has not yet been approved by HUD, and their original Action Plan was found to be discriminatory to Black and Hispanic residences.

For these reasons, the Harris County Flood Control District believes approval of the H-GAC MOD at this time would be pre-mature, and respectfully requests that the MOD be revised to include eligible agencies within Harris County.

Sincerely,

DocuSigned by:

A handwritten signature in black ink that reads 'Tina Petersen'.

2B86569B8F95484

Tina Petersen, PhD., P.E.  
Executive Director

072822 HGAC COMMENTS TO MOD

**Congress of the United States**  
Washington, DC 20515

July 28, 2022

Houston-Galveston Area Council  
Attn: Cheryl Mergo  
P.O. Box 22777  
Houston, TX 77227-2777

Re: Houston-Galveston Area Council Community Development Block Grant-Mitigation Method of Distribution

Dear Members of the Houston-Galveston Area Council Board:

We welcome the opportunity to submit comments on the Houston-Galveston Area Council (H-GAC) Community Development Block Grant-Mitigation (CDBG-MIT) Method of Distribution (MOD). The funds in this MOD, which were appropriated by Congress, will reduce the risk of future flooding in the regions most impacted by significant rain events in 2015, 2016, and 2017, including Hurricane Harvey. It is an important step in addressing our disaster mitigation needs, and we thank you for your commitment to supporting Texas communities in our region.

As you know, Hurricane Harvey devastated the Gulf Coast region in 2017, its nearly 60 inches of rain and related flooding claiming 68 lives and causing an estimated \$125 billion in damage. This destructive storm was the third in three years, following significant rain events in 2015 and 2016 in Houston and Harris County, the Memorial Day and Tax Day floods. Harris County, the most populous county in Texas, is the only county in Texas that the U.S. Department of Housing and Urban Development (HUD) identified as “most impacted and distressed” from the Memorial Day flood in 2015, the Tax Day flood in 2016, and Hurricane Harvey in 2017.

The U.S. Congress passed the *Bipartisan Budget Act of 2018* (BBA) shortly after Hurricane Harvey and appropriated \$12 billion in CDBG-MIT funding for hazard mitigation activities in response to qualifying disasters in 2015, 2016, and 2017, including Hurricane Harvey. Congress intended these funds to be used to mitigate future risk in the areas most impacted by these disasters. The BBA is clear that areas that received the most CDBG Disaster Recovery (CDBG-DR) funds should receive the most CDBG-MIT funds to mitigate damages and lessen the need for CDBG-DR funding in the future.

After seeing the results of the H-GAC board’s vote in February, we are concerned that the decision to allocate only \$9.2 million to the City of Houston will fail the communities most impacted by Harvey and prior storms and leave those communities even more vulnerable to future disasters. This proposed allocation denies the intent of the Congress that appropriated the funds and leaves the City of Houston, which makes up 30% of the region’s population and almost 50% of the damages from Hurricane Harvey, with approximately 2% of H-GAC’s available funds. We are further concerned by the board’s discussions to deny H-GAC funding to any cities within Harris County if the Texas General Land Office’s (GLO) Action Plan Amendment 1, which awards \$750 million to Harris County, is approved.

As you know, Action Plan Amendment 1 proposes an allocation of \$750 million in CDBG-MIT funds for Harris County to distribute to flood and drainage districts and municipalities within their jurisdiction, including the City of Houston. Because Harris County and Houston were not awarded any funds in GLO's \$2.3 billion funding competition, this proposed allocation will be the sole direct funding source for our local governments to complete mitigation projects in Houston and Harris County.

This proposed subgrant of less than \$750 million is not sufficient for the communities in Houston and the damage they faced during Hurricane Harvey and the floods in 2015 and 2016. Furthermore, because this plan has not yet been approved by HUD, there is no guarantee these funds will ever get to Harris County or the City of Houston. Without approval of this plan and a method of distribution with which Harris County will allocate those funds, it is not a responsible approach for H-GAC to consider reducing the current allocation to zero.

On behalf of our constituents, and having consulted local leaders and experts, we ask H-GAC to award funds to the City of Houston based on Congressional intent, focusing on the regions most impacted by the flooding in 2015, 2016, and 2017. There is no reason the City of Houston should receive only 2% of available funds after suffering nearly 50% of damages.

We urge H-GAC to take these considerations into account as the MOD is being developed. We also ask that H-GAC work with local leaders to make data-driven changes to this MOD so that it more accurately reflects the disproportionate damage Houston has faced in recent years. We look forward to working with you to ensure that Houston receives a fair and appropriate allocation of these funds.

Sincerely,



Lizzie Fletcher  
Member of Congress



Sylvia Garcia  
Member of Congress



Al Green  
Member of Congress



# Abbie Kamin

Houston City Council Member, District C

July 28, 2022

Board of Directors  
Houston-Galveston Area Council  
3555 Timmons Lane  
Houston, TX 77027

Dear Members of the H-GAC Board of Directors,

As the Houston City Council Member for District C, I represent nearly 250,000 residents and some of the neighborhoods hardest hit by flooding in the city, including areas with the most repetitive instances of flooding in the entire region. I also serve as Chair of our city's Public Safety & Homeland Security Committee and have the privilege to serve as an alternate at TPC on behalf of the City of Houston.

I respectfully submit the following for the record, raising strong objections to the proposed method of distribution (MOD) of Community Development Block Grant- Mitigation (CDBG-MIT) funds as I did in previous testimony at the February 15, 2022 Board Meeting before this body. Flood prone communities in my district and across the city deserve protection. Additional funds must be allocated to the City of Houston under the Houston-Galveston Area Council's (H-GAC) proposed allocation scheme. Alternatively, this item should be tabled or delayed until a more appropriate time.

The proposed MOD unjustifiably allocates a mere 1.9% of H-GAC's \$488,762,000, to the City of Houston. This small of an allocation runs contrary to the Congressional intent for these funds and the demographic and hydrological realities of the region over which H-GAC has jurisdiction.

**The overwhelming population Houston represents when compared to other areas should be considered to ensure funds are fairly and equitably allocated.** Houston is home to over 2.3 million people, making up 31% of the entire population H-GAC serves. Its population size is also more than 15 times larger than the next largest member city. Despite representing millions of Texans, the current plan allocates fewer funds to Houston than some of the significantly less populous members, including, in one case, \$2.5 million less than a County with a population of less than 42,000.

**Jurisdictions with significant flooding history should receive a larger portion of funds as intended by Congress.** Houston is the only major city in the region to experience consecutive declared flood disasters in 2015, 2016, and 2017. The funds at issue were allocated by Congress as a response to the weather-related disasters from 2015 to Hurricane Harvey. Looking beyond Harvey, the challenges continue. The City of Houston has experienced at least seven federally declared disasters in six years.

**H-GAC should not stray from proportional distribution models previously followed in doling out federal disaster dollars.** Houston sustained approximately 50% of the statewide damage in Hurricane Harvey. Recovery from this disaster was the impetus for these dollars to be distributed by H-GAC. Previously, the City of Houston received 25% of total CDBG-DR17 dollars (with Harris County receiving an independent 25%), and about 40% of FEMA hazard mitigation dollars in the aftermath of the disaster. H-GAC should follow common-sense, proportional standards based on damage sustained to ensure lives and the greater regional economy is not at risk.

**H-GAC should not rely on GLO's proposed award to Harris County in the determination of funding amounts for the City of Houston.** The obvious and blatant issues with GLO's own funding scheme- that is the source of these funds- is currently being challenged and is not final. As such, H-GAC should, at the very least, delay or table this item until the matter is settled in the eyes of Federal Departments involved. Furthermore, the funding scheme by the GLO, and its de minimis allocation to Harris County should not be considered in the distribution model this body uses. Not only is Harris County a separate and independent jurisdiction from the City of Houston, \$750 million directed from GLO between two of the largest populations and the hardest hit by natural disasters, is wholly insufficient and should not be the basis of this body's proposal to allocate a mere 1.9% of funds to Houston. It is not known whether Houston will receive any of the funds GLO allocated to Harris County, and it should not be assumed that it will. Any allocation to Houston should be considered independent of Harris County.

The ability of the city to effectively protect our communities does not just depend on county bayous and rivers, but on the ability of our urban drainage systems to convey stormwater to larger channels. As a city we are doing all we can with what we have, but it is not enough. Without an adequate and proportional CDBG-MIT allocation, we will not have the drainage capacity to protect lives and livelihoods. Failing to provide that funding will have significant upstream and downstream outfall impacts, putting not only my district's neighborhoods at substantial risk, but many of the surrounding communities in the H-GAC region.

We are all in this together. Without the proper investment in Houston, H-GAC as a whole will not be able to thrive as it has for so many years.

I appreciate H-GAC leadership and staff for their work, and the Board's consideration of the sizeable objections presented by the public. I respectfully request reconsideration of the method of distribution. Alternatively, I ask that this item be tabled or suspended until such time that other funding distributions are finalized.

Respectfully,



Abbie Kamin  
Houston City Council Member, District C  
Chair, Public Safety & Homeland Security Committee



MARY NAN HUFFMAN  
Houston City Council Member, District G

July 28, 2022

Dear Houston-Galveston Area Council Board of Directors,

Following Hurricane Harvey in 2017, Houston was left with \$16 billion in residential damage and nearly 100,000 flooded houses. Almost five years later, the effects of this storm are still being felt in the communities that I represent on Houston's west side.

In response to the devastation that was endured by our region, the Texas General Land Office (GLO) allocated \$488,762,000 in federal CDBG-MIT funds to the Houston-Galveston Area Council (H-GAC) for mitigation projects designed to increase the region's resilience to natural disasters.

In February of this year, H-GAC's Water Resources Committee and the H-GAC Board approved a preliminary Method of Distribution (MOD) for these funds which allocated a meager 1.9 percent of those dollars to Houston — the largest population center in the region, and fourth-largest city in the United States.

The consensus of the H-GAC Board seemed to indicate that because Harris County is receiving \$750 million, cities within the county should be mostly excluded. I believe that this rationale is flawed because it does not consider timing.

Harris County's MOD has not been released and there is, so far, no indication that the City of Houston will be the recipient of any of the county's CDBG-MIT funds. Improving drainage infrastructure in the largest city in Texas is an issue too important to be left to this kind of assumption.

I urge H-GAC to delay approval of their preliminary MOD until after the Harris County MOD is released. Afterwards, H-GAC will be able adjust the allocation for Houston to best account for what funding the city may have received from Harris County. This reconsideration will provide H-GAC with the opportunity to ensure that the communities which received the most devastation will benefit proportionally from these funds.

I appreciate your consideration of this request and continue to be appreciative of your service to the residents of our region.

Kind regards,

*Mary Nan Huffman*

Brays Oaks Super Neighborhood #36  
10611 Fondren Rd  
Houston, Texas 77036

July 26, 2022

Via Email: [CDBGMitigation@h-gac.com](mailto:CDBGMitigation@h-gac.com)

Houston-Galveston Area Council  
Attn: Cheryl Mergo

RE: H-GAC Preliminary Method of Distribution for CDBG-MIT Regional Mitigation Program Funds

To the Houston-Galveston Area Council:

The Brays Oaks Super Neighborhood Council #36 requests that the Houston-Galveston Area Council ("H-GAC") change the provisions in its preliminary Method of Distribution ("MOD") plan which currently exclude cities located in Harris County from funding consideration until the reallocation of declined funds. If there are no declined funds, Houston and the other cities in Harris County will receive zero dollars from the H-GAC. Although the Texas General Land Office ("GLO") may have approved the preliminary MOD, these provisions are inconsistent with the intent expressed in the GLO Staff Responses in the State Action Plan Amendment 1 ("Amendment 1"). If the H-GAC disagrees, then, as an alternative the Super Neighborhood requests that the H-GAC wait to submit its MOD plan to the GLO until Harris County publishes its MOD and the two MOD plans can be coordinated to ensure funding for cities within Harris County.

In Amendment 1, Section 5.4.5.4. the GLO states that "Funds from the Harris County MOD may be allocated to: i Harris County; ii cities or towns within Harris County; and iii special purpose districts...." Amendment 1, page 251. The GLO wrote "may," not "shall" or "will" or "must." The decision regarding

who receives a MOD allocation is discretionary with Harris County. The primary concern is that each proposed project must mitigate one of the identifiable risks under Section 5.4.5.1.

Therefore, it is possible that none of the cities located within Harris County will receive an allocation from Harris County.

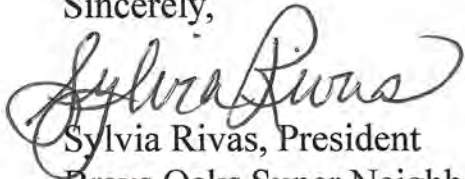
As the GLO Staff commented in some of its Amendment 1 Responses: "Houston, as a city within Harris County, will benefit from projects the Harris County method of distribution identifies." Amendment 1, Page 365. However, the GLO Staff did not end their discussion of funds for the cities in Harris County there.

The GLO Staff Responses to commenters regarding cities in Harris County, particularly Houston, made clear that the cities are eligible to receive funding from both the Harris County MOD and the H-GAC MOD. In response to a received comment in which the commenter stated that Houston will still receive zero dollars for its mitigation projects, the GLO Staff Response stated "The City of Houston is an eligible entity in both the Harris County Mitigation Method of Distribution and the Regional Mitigation Program for the Houston-Galveston Area Council Method of Distribution. The commenter is encouraged to contact local public officials for more information regarding the distribution of MIT funding within each of these areas that may benefit the City of Houston." Amendment 1, Pages 354 – 355. As confirmed repeatedly by H-GAC, the GLO is giving H-GAC \$488,762,000 and Harris County \$750,000,000 for a total distribution amount of \$1,238,762,000 for our region. The GLO Staff Responses makes numerous references to the total of \$1.2 billion being available for distribution for City of Houston projects. For example, in response to a Houston City Council Member who discussed needed drainage projects in her District but does not have any funding for the projects, the GLO Staff Response stated "Action Plan Amendment 1 more than doubles the funds available for the Regional Mitigation Program which focuses on local control of limited mitigation funds available in the state. The GLO encourages the commenter to participate in the Public Planning Meeting and the second public hearing on the draft Houston-Galveston Area Council Method of Distribution and the Harris County Mitigation Method of Distribution where another \$1.2 billion of CDBG-MIT funding will be considered for

allocation.” Amendment 1, page 379. Similar comments about the \$1.2 billion funding and the dual eligibility are included in GLO Staff Responses to commenters discussing Northeast Houston (Amendment 1, pages 353 and 368), the Brays Bayou area in Houston (Amendment 1, page 379), the Westbury area in Houston (Amendment 1, page 400), the Pleasantville area in Houston (Amendment 1, page 355), and Houston in general (Amendment 1, pages 360, 381, 382, 384, 397).

What is important is that the \$1.2 billion be used to make our region more resilient in the future which includes reducing or even eliminating future flooding. We hope that H-GAC will redesign its MOD to provide funding to cities located within Harris County and even work together with Harris County to benefit all of the at-risk residents and businesses in our region.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sylvia Rivas".

Sylvia Rivas, President

Brays Oaks Super Neighborhood Council #36

[Braysoakssnc36@gmail.com](mailto:Braysoakssnc36@gmail.com)

(832) 729-0212

<http://www.houstontx.gov/superneighborhoods/36.html>

[Braysoakssnc36.org](http://Braysoakssnc36.org)

**Congress of the United States**  
**Washington, DC 20515**

July 28, 2022

Houston-Galveston Area Council  
3555 Timmons Lane, Suite 100  
Houston, TX 77027

Re: Continued Injustice Against Houston, TX in the Distribution of Community Development Block Grant-Mitigation Funds

Dear Members of the Houston-Galveston Area Council (H-GAC) Board,

Thank you for holding a public hearing on the Method of Distribution of Community Development Block Grant-Mitigation (CDBG-MIT) funds for flood risk mitigation projects.

We join Council Member Alcorn and Mayor Turner in opposition to the H-GAC's decision to award the City of Houston less than 2% of the total CDBG-MIT funds allocated for the Council. When Congress appropriated \$4.3 billion in CDBG-MIT funds for disaster relief in the wake of Hurricane Harvey, these funds were meant to be distributed in an equitable manner to the most impacted communities. **While the General Land Office's (GLO) funding allocation formula created an unjust and inequitable distribution, the H-GAC Board's decision to allocate so few resources to the City of Houston only compounds this injustice.**

Some Board members cited the GLO's allocation of \$750 million to Harris County as a reason not to provide further funds for the City of Houston, as it lies within the county. The notion that, because some funds are going to Harris County, the City of Houston should not receive further assistance is groundless. Harris County is the only county in Texas to have experienced three consecutive years of flooding disasters, in 2015, 2016, and 2017. When Hurricane Harvey struck, Harris County was inundated with 1 trillion gallons of water in just four days.

The City of Houston desperately needs disaster relief funds to build infrastructure that can lessen the impact of flooding disasters. Unless additional CDBG-MIT funds are distributed to the City of Houston, we will neither be able to repair the damage inflicted by consecutive flooding disasters and Hurricane Harvey nor will we be able to prepare for future catastrophes. The City of Houston and Harris County require as much relief funding as they can receive.

We urge you to reconsider this Method of Distribution. Thank you for your attention to this crucial matter. Should you have any additional questions, please do not hesitate to contact Rep. Al Green's Chief of Staff, Niha Razi, at 202-760-1809 or [niha.razi@mail.house.gov](mailto:niha.razi@mail.house.gov).

Sincerely,

/s/

Al Green  
Member of Congress

/s/

Sheila Jackson Lee  
Member of Congress

/s/

Sylvia Garcia  
Member of Congress



Thursday, July 28, 2022

## City Council Member Tiffany D. Thomas' Response to H-GAC MOD Announcement

In February the Houston Galveston Area Council (H-GAC) board voted to award the City of Houston \$9,232,700—only **1.9%** of the preliminary method of distribution (MOD) of \$488 million in risk mitigation funds for projects related to flooding, hurricanes, and other natural disasters. Though many board members acquiesced to the notion that cities within Harris County should receive any funds due to the County being awarded \$750 million, I will concede. However, if it had not been for the damage within the City of Houston during Hurricane Harvey, funding would not be available.

The proposed MOD is minimal at best and does not truly support the full picture in terms of damage to the families and communities of Houston who have still not fully recovered from the destruction of Hurricane Harvey.

The board's stance aligns with negligent and unequitable ideologies that are harmful to Houstonians where infrastructure investments remain a top priority. Moreover, this non-inclusive approach has handicapped the city from appropriately and effectively directing its efforts towards flood mitigation and infrastructural advancements in neighborhoods that need it the most. I represent several neighborhoods where residents are arrested with fear that their home might flood after a rain occurrence.

The direction that both General Land Office (GLO) and H-GAC has taken against issuing the City of Houston the appropriate and equitable provision is devastatingly critical for our residents. To be frank, the allocation to Harris County instead of the City of Houston should not be viewed as a victory, but instead a complete flex of control over the city by outside entities.

📍 City Hall Annex  
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✉ [districtf@houstontx.gov](mailto:districtf@houstontx.gov)



[www.houstontx.gov/council/f/](http://www.houstontx.gov/council/f/)



# SIERRA CLUB

## LONE STAR CHAPTER

July 28, 2022

Houston-Galveston Area Council  
3555 Timmons Lane, Suite 120,  
Houston, TX 77027  
P.O. Box 22777  
Houston, Texas 77227-2777  
Phone: (713) 627-3200

Re: Public Comments to H-GAC on Preliminary COG MOD  
Via email to: [PublicComments@h-gac.com](mailto:PublicComments@h-gac.com)

To Whom It May Concern at H-GAC:

The Lone Star Chapter of the Sierra Club is the state chapter of the Sierra Club, and the Houston Regional Group represents the Sierra Club in counties in the larger H-GAC area. We have roughly 28,000 members in Texas, including approximately 5,000 in the H-GAC region. We participated in public meetings and the comment period with the GLO's initial MIT-CDBG plan and were supportive of including specific money for the Council of Governments for future distribution as part of that plan. We have had a chance to review the Houston-Galveston Area Council's (H-GAC) Method of Distribution (MOD) for \$488,772,000 in Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation Program funds. We do appreciate the opportunity to offer brief comments, but are very disappointed that the draft plan appears to cut out opportunities for funding in the area that was most impacted by Hurricane Harvey, as well as the lack of detail to the importance of green infrastructure.

We have three main comments: 1. Don't remove Harris County from funding consideration: 2. Amend the Method of Distribution to better center equity; 3. Prioritize natural and green infrastructure and smart land use and development.

### **1. Do Not Remove Harris County and Municipalities Within Harris County from Eligibility**

Under its proposal, H-GAC's MOD would specifically exclude Harris County and municipalities within its jurisdiction from a distribution by the COG. The rationale in excluding Harris County from the \$488 million is that Harris County has been pegged for a future allocation of \$750 million by the GLO in its State Action Plan through Amendment No 1, and will develop its own distribution method. However, that amendment was needed due to the GLO's initial lack of funding provided for Harris County, and was the result of the rejection of the GLO's plan by HUD, and is unrelated to this pot of money.

In fact, Harris county and the City of Houston had the largest number of households impacted, the largest disaster damage score, the biggest low-to-moderate income population, and the highest population in the floodplain. Indeed, Amendment No. 1 only occurred after Texas Housers and Northeast Action Collective filed a complaint with the United States Department of Housing and UrbanDevelopment (HUD), "alleging that GLO's design and operation of the Competitiondiscriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents."

Earlier this year, HUD required the GLO to enter into a Voluntary Compliance Agreement (VCA) to avoid further scrutiny by the United States Department of Justice (DOJ). In the meantime, as a result, the GLO has amended its State Action Plan (Amendment 1) to include the Harris County Mitigation Method of Distribution – providing \$750 million to the county to distribute. Amendment 1 more than doubled the funding in the Regional Mitigation Program – the GLO's second largest program – from \$500 million to nearly \$1.2 billion. Importantly, the programs that the GLO amended in order to provide funds to the Harris County Mitigation MOD were always separate from the Regional Mitigation Program – and nowhere under the State Action Plan was there any discussion about excluding Harris County or municipalities within its jurisdiction from the Regional Mitigation Program due to Amendment 1.

It makes no sense to cut Harris County and its cities out of the allocation simply because Harris County will be getting a separate portion of funding. Instead, we should consider equitable funding as a whole, including the H-GAC initial pot of \$488 million being discussed.

In fact, the GLO has already awarded money to many jurisdictions that are part of the H-GAC

under the Hurricane Harvey State Mitigation Competition. If the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition, it should not single out Harris County and municipalities within its jurisdiction from eligibility. Nowhere else in the COG's MOD does H-GAC remove other entities, or reduce the amount of funding eligible to those entities, if they received funding under the Hurricane Harvey State Mitigation Competition. Therefore, we believe that the COG unjustly singles out Harris County and municipalities within its jurisdiction for exclusion.

In addition, removing Harris County from the H-GAC MOD opens the COG up to a Title VI complaint since it excludes the most diverse region within the COG from eligibility. If an investigation did occur, it could open the COG up to timely delays – harming the region as a whole.

We strongly urge H-GAC to allow Harris County and the municipalities within its jurisdiction eligibility to receive funds. While we do not have a specific number to suggest, we would note that the City of Houston has recommended that 30%, or \$148 million, of the COG's funds should go to the city. We believe that assuring that 30 to 40 percent of the funds go to the City of Houston and Harris County is appropriate.

### **Distribution Factors Should Focus on Ensuring Equitable Distribution of H-GAC COG MOD Funds**

The COG MOD should allocate funds to mitigate disasters in the areas of highest vulnerability and the areas most at risk due to hazards. One way to achieve this would be for the CDC's Social Vulnerability Index (SVI) to be added to the distribution factors. Entities with high SVI scores should be prioritized for distribution of funds under the MOD. Providing equity in funding to areas and peoples that are most vulnerable is key.

Under the current proposed framework, H-GAC puts a high value on personal and real property damage as a distribution factor. This tends to disproportionately provide funds to high income areas. Thus, areas that are less vulnerable may under the MOD that is proposed may benefit more than more vulnerable areas. Instead, the MOD should prioritize equity and vulnerable areas.

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We recommend reducing the weighting of personal and real property compared to other factors that would distribute funds to the most vulnerable areas with the highest risk. We do not object to giving personal and real property damage some consideration but believe it is over-emphasized in the proposed MOD.

**Prioritize natural or green infrastructure projects and also projects to make the coast more resilient through local land use and building codes.**

Natural or green infrastructure projects were heavily encouraged for the use of CDBG-MIT funds in the GLO's State Action Plan. However, out of the 81 projects that were chosen for initial funding by the GLO, only one project incorporated natural infrastructure features.

Green and natural infrastructure projects benefit communities year- round, reducing risks from multiple hazards such as improving air and water quality and mitigating urban heat island effect, while also providing recreational spaces for communities. There are vast areas of native prairie and important woodland lands that can and should be protected and could be an important asset in protecting coastal communities.

Due to the importance of green and natural infrastructure projects, we urge H-GAC to promote green and natural infrastructure by reconsidering a set aside for natural or green infrastructure projects. This can be done by making natural or green infrastructure a regional priority and limiting subrecipients in the region to projects that meet that priority. Even in "traditional" infrastructure projects H-GAC can provide additional consideration if those projects include some attention to green design and infrastructure as part of the overall project.

In addition, prioritizing projects that involve comprehensive land use ordinances and adoption of modern building codes – such as the suite of 2021 International Code Council - can assure that new construction is built in appropriate non-flood-prone areas and built to standards meant to withstand hurricanes and reduce water and energy use. It is vital for cities and counties to invest in modernizing our land use ordinances and adopting and enforcing modern building codes.

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The Lone Star Chapter of the Sierra Club and the Houston Regional Group of the Sierra Club appreciate this opportunity to submit these brief comments,

Cyrus Reed, PhD  
Conservation Director  
Sierra Club, Lone Star Chapter  
[Cyrus.reed@sierraclub.org](mailto:Cyrus.reed@sierraclub.org)

Frank Blake  
Conservation Committee  
Houston Group, Sierra Club

**[frankblake@juno.com](mailto:frankblake@juno.com)**

July 28, 2022

Jeff Taebel  
Director, Community and Environmental Planning  
Houston-Galveston Area Council  
P.O. Box 22777  
Houston, Texas 77227-2777

**Re: Public Comments to H-GAC on Preliminary COG MOD**

Via email to: [PublicComments@h-gac.com](mailto:PublicComments@h-gac.com)

Dear Mr. Taebel,

Please accept this document as the written comments of the undersigned groups regarding the Houston-Galveston Area Council's (H-GAC) Method of Distribution (MOD) for \$488,772,000 in Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation Program funds. As always, our organizations appreciate the opportunity to provide public comment.

Our comments and recommendations below focus on the allocations, factors to determine allocations, and set asides for nature-based projects.

**1. Do Not Remove Harris County and Municipalities Within its Jurisdiction from Eligibility**

Under H-GAC's proposed Method of Distribution, Harris County and municipalities within its jurisdiction are excluded from a distribution by the COG. H-GAC's explanation for this exclusion is that Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities.<sup>1</sup>

According to H-GAC's data, Harris county and the City of Houston had the largest number of households impacted, the largest disaster damage score, the biggest low-to-moderate income population, and the highest population in the floodplain.<sup>2</sup> In order to achieve equitable distribution of funds, Harris County and the City of Houston should not be left out of an allocation under H-GAC's MOD.

- a. *Harris County's \$750 Million Allocation Under the Harris County Mitigation Method Of Distribution Was to Remedy Previous Exclusion Under Round One of Hurricane Harvey State Mitigation Competition*

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<sup>1</sup> H-GAC Preliminary CDBG-MIT MOD, at 2 ("The reasoning behind this decision was that Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities.").

<sup>2</sup> H-GAC Preliminary CDBG-MIT MOD, Attachment 2a – H-GAC Allocation Summary Calculation Worksheets.

Under the first Hurricane Harvey State Mitigation Competition round, Harris County and City of Houston originally were set to receive zero CDBG-MIT funds from the GLO. After the GLO published press releases detailing the recipients list, Texas Housers and Northeast Action Collective filed a complaint with the United States Department of Housing and Urban Development (HUD), “alleging that GLO’s design and operation of the Competition discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.”

Earlier this year, HUD agreed with the Complainants and found that the GLO’s scoring criteria was in violation of Title VI of the Civil Rights Act of 1964 and its implementing regulations (Section 109).<sup>3</sup> To remedy the violation, HUD required the GLO to enter into a Voluntary Compliance Agreement (VCA) to avoid further scrutiny by the United States Department of Justice (DOJ).

While a VCA has not yet been reached, the GLO has amended its State Action Plan (Amendment 1) to include the Harris County Mitigation Method of Distribution – providing \$750 million to the county to distribute. The GLO was able to provide these funds to the new program, by removing the second round of the Hurricane Harvey State Mitigation Competition, and by taking funds away from other programs. In addition to creating the Harris County Mitigation MOD, Amendment 1 more than doubled the funding in the Regional Mitigation Program – the GLO’s second largest program – from \$500 million to nearly \$1.2 billion.

The motivation for providing Harris County with its own MOD was therefore due to the significant backlash and subsequent HUD investigation which found that the scoring criteria under the Hurricane Harvey State Mitigation Competition violated Title VI. Importantly, the programs that the GLO amended in order to provide funds to the Harris County Mitigation MOD were always separate from the Regional Mitigation Program – and nowhere under the State Action Plan was there any discussion about excluding Harris County or municipalities within its jurisdiction from the Regional Mitigation Program due to Amendment 1.

*b. No Other Entities That Received Funds Under the Hurricane Harvey State Mitigation Competition Were Excluded From the H-GAC’s MOD*

The GLO awarded entities within H-GAC’s jurisdiction with over \$333 million in awards (see **Table 1**) under the Hurricane Harvey State Mitigation Competition.<sup>4</sup> We disagree with H-GAC’s reasoning, that since Harris County is receiving \$750 million under Amendment 1, Harris County and municipalities within its jurisdiction should be excluded from an allocation under the COG’s MOD.

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<sup>3</sup> U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, Letter Finding Noncompliance with Title VI and Section 109, (March 4, 2022), available at: <https://texashousers.org/wp-content/uploads/2022/03/HUD-Letter-Finding-Noncompliance-with-Title-VI-and-Section-109-.pdf>.

<sup>4</sup> GLO Press Releases (May 21, 2021), available at: <https://recovery.texas.gov/press-releases/index.html>.

County	Awards under Round 1 – Hurricane Harvey State Mitigation Competition
Austin	\$45,800,000
Brazoria	\$15,600,000
Chambers	\$3,500,000
Colorado	\$0
Fort Bend	\$47,500,000
Galveston	\$179,000,000
Harris	\$0
Liberty	\$3,300,000
Matagorda	\$8,000,000
Montgomery	\$0
Walker	\$6,600,000
Waller	\$9,300,000
Wharton	\$14,800,000

**Table 1:** GLO Awards by County under Round 1 – Hurricane Harvey State Mitigation Competition

If the COG wished to remove eligibility for entities that received funds under the Hurricane Harvey State Mitigation Competition, it should not single out Harris County and municipalities within its jurisdiction from eligibility. Nowhere else in the COG’s MOD does H-GAC remove other entities, or reduce the amount of funding eligible to those entities, if they received funding under the Hurricane Harvey State Mitigation Competition. Therefore, we believe that the COG unjustly singles out Harris County and municipalities within its jurisdiction for exclusion.

*c. Excluding Harris County and the Municipalities Within its Jurisdiction Could Arise to a Violation of Title VI of the Civil Rights Act of 1964*

The GLO, in administration of CDBG-MIT funds certified that it will conduct and administer the CDBG-MIT funds in accordance with the Title VI of the Civil Rights Act of 1964. Further, H-GAC must also adhere to Title VI – and has assured that no COG activity or program shall discriminate against any of the protected classes.<sup>5</sup>

Removing Harris County and the municipalities within its jurisdiction from the H-GAC MOD may open the COG up to a Title VI complaint since it excludes the most diverse region within the

<sup>5</sup> “In accordance with Title VI of the Civil Rights Act of 1964, the **Houston-Galveston Area Council assures that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any agency sponsored program or activity** on the grounds of their race, color, or national origin, neither shall any individual be deprived of fair treatment as a result of their sex, age, or disability.” <https://www.h-gac.com/title-vi-program>.

COG from eligibility (see **Table 2**). In addition to having the most diverse population in terms of number of minorities, Harris County also has the:

- lowest percentage of white alone, not Hispanic or Latino population
- second lowest percentage white alone population
- second highest percentage Hispanic or Latino population; and
- third highest percentage Black or African American alone population.

County	Population	White Alone (%)	Number of People	Black or African American Alone	Number of People	Hispanic or Latino (%)	Number of People	White alone, not Hispanic or Latino	Number of People
Austin	30,380	87	26431	9.4	2856	28.7	8719	60.3	18319
Brazoria	379,689	73.3	278312	16.3	61889	32.3	122640	43.2	164026
Chambers	48,865	87.4	42708	8.4	4105	26.3	12851	63	30785
Colorado	20,630	83.2	17164	12.4	2558	32.2	6643	54.2	11181
Fort Bend	858,527	<b>53.4</b>	458453	21.9	188017	25.5	218924	30.2	259275
Galveston	355,062	80.1	284405	13.2	46868	26.4	93736	55.6	197414
<b>Harris</b>	<b>4,728,030</b>	69	<b>3262341</b>	20.3	<b>959790</b>	44.4	<b>2099245</b>	<b>27.7</b>	<b>1309664</b>
Liberty	97,621	86.6	84540	9.3	9079	34.3	33484	54.9	53594
Matagorda	36,344	83.8	30456	10.9	3961	<b>45.1</b>	16391	41.8	15192
Montgomery	648,886	86.7	562584	6.6	42826	26.4	171306	62.2	403607
Walker	77,977	72.9	56845	<b>23.4</b>	18247	18.7	14582	55.8	43511
Waller	59,781	71.4	42684	23.3	13929	32.4	19369	41.9	25048
Wharton	41,721	83.9	35004	13.5	5632	43.7	18232	42.6	17773

**Table 2: Demographic Breakdown of Counties within H-GAC<sup>6</sup>**

Not only would excluding Harris County and the municipalities within its jurisdiction result in removing the most diverse populations from receiving funding, but an investigation could open the COG up to timely delays – which would harm the region as a whole.

<sup>6</sup> 2021 American Community Survey data, available at: <https://www.census.gov/quickfacts/TX>.

Therefore, because the Regional Mitigation Program was separate from the Hurricane Harvey State Mitigation Competition, no other eligible entities in the Houston-Galveston region that received funds under the Hurricane Harvey State Mitigation Competition were removed, and because removing Harris County and the municipalities within its jurisdiction could arise to a violation of Title VI, we strongly urge H-GAC to allow Harris County and the municipalities within its jurisdiction eligibility to receive funds. We support the City of Houston's recommendation that 30%, or \$148 million, of the COG's funds should go to the city.

**2. Distribution Factors Should Focus on Ensuring Equitable Distribution of H-GAC COG MOD Funds to the Greatest Number of People Most Vulnerable to Hazards**

The COG MOD should have the goal of allocating funds to mitigate disasters in the areas of highest vulnerability and the areas most at risk due to hazards. Distributing funds in this way will help facilitate equitable outcomes under H-GAC's MOD. We believe that the CDC's Social Vulnerability Index (SVI) should be added to the distribution factors. As noted in the State Action Plan, "[e]ffectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster." Entities with high SVI scores should be prioritized for distribution of funds under the MOD.

Further, using personal and real property damage as a distribution factor could disproportionately provide funds to high income areas and therefore less vulnerable areas. Using personal and real property damage could also eliminate the effect of using low-to-moderate income populations as a distribution factor – since they are provided equal weighting. Therefore, in order to equitably distribute CDBG-MIT funds within the COGs jurisdiction to the areas that are most vulnerable, we recommend either removing amount of personal and real property damage from consideration, or reducing the weighting compared to other factors that would distribute funds to the most vulnerable areas with the highest risk rating.

**3. Provide a Set Aside for Green and Natural Infrastructure Projects as a Regional Priority**

Natural or green infrastructure projects were heavily encouraged for the use of CDBG-MIT funds, not just in HUD guidance, but also in the GLO's State Action Plan. However, out of the 81 projects that were chosen for funding by the GLO under the first round of Hurricane Harvey State Mitigation Competition, only one project seemed to incorporate natural infrastructure features.

While traditional infrastructure projects are necessary in many areas, it is also important to invest in innovative green and natural infrastructure projects, where appropriate. In addition to flood mitigation benefits, green and natural infrastructure projects benefit communities year-round, reducing risks from multiple hazards such as improving air and water quality and mitigating urban heat island effect, while also providing recreational spaces for communities.

Due to the importance of green and natural infrastructure projects, we urge H-GAC to promote green and natural infrastructure by reconsidering a set aside for natural or green infrastructure projects. This can be done by making natural or green infrastructure a regional priority and limiting subrecipients in the region to projects that meet that priority.

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The undersigned organizations are dedicated to an effective and equitable distribution of CDBG-MIT resources. Thank you again for the opportunity to provide these comments.

Sincerely,

**Danielle Goshen**

Policy Specialist/Counsel  
National Wildlife Federation  
[GoshenD@nwf.org](mailto:GoshenD@nwf.org)

**Becky Martinez**

Conservation Director  
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Advocacy Director  
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July 28, 2022

Jeff Taebel  
Director, Community and Environmental Planning  
Houston-Galveston Area Council  
P.O. Box 22777  
Houston, Texas 77227-2777  
via email to [PublicComments@h-gac.com](mailto:PublicComments@h-gac.com)

**Comments on the H-GAC Preliminary Method of Distribution for Community Development Block Grant - Mitigation (CDBG-MIT) Regional Mitigation Funds**

Dear Mr. Taebel:

Thank you for the opportunity to comment on the HGAC CDBG-MIT Preliminary Method of Distribution (MOD). For the reasons detailed in these comments, including potential violations of Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, and the Fair Housing Act; H-GAC must revise its preliminary MOD before presenting it to GLO for final approval and submission to HUD as an Action Plan Amendment.

Texas Appleseed<sup>1</sup> is a non-profit public interest justice center that promotes social, economic, and racial justice for all Texans. We have worked on disaster recovery issues and to ensure equity in disaster recovery programs since Hurricane Rita in 2006.

Bayou City Water Keeper was established in 2001. Our mission is to protect and restore the integrity of our bayous, rivers, streams, and the bays through advocacy, education, and action. Our work includes supporting resilient communities and advocating for equitable solutions to flooding.

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<sup>1</sup> Texas Appleseed's mission is to promote social and economic justice for all Texans by leveraging the skills and resources of volunteer lawyers and other professionals to identify practical solutions to difficult systemic problems. Texas Appleseed conducts data-driven research to uncover inequity in laws and policies and identify solutions for lasting, concrete change.

**I. H-GAC's Exclusion of Harris County from its MOD is Unjustified and Contravenes the Purpose of the CDBG-MIT Program and the State Action Plan**

H-GAC's stated reason for not allocating funding to Harris County or any cities within Harris County in its MOD is that "Harris County has been allocated \$750 million by GLO in its State Action Plan Amendment 1 and will develop its own Method of Distribution to serve its communities." However, CDBG-MIT Amendment 1 did not, and was not intended to, exclude Harris County from funding under the Regional Method of Distribution Program. The allocation of funds directly to Harris County in Amendment 1 was intended to partially correct for the state's use of scoring criteria in its Round 1 Hurricane Harvey Statewide Competitive Grant Competition program that discriminated against Hurricane Harvey survivors on the basis of race, color, and national origin, depriving Harris County and the City of Houston, in particular, of mitigation funding.<sup>2</sup>

The 2018 Congressional appropriation of \$12 billion for mitigation activities, allocated in proportion to the amount of CDBG-DR funding grantees received for disasters occurring in 2015, 2016, and 2017, "represents a unique and significant opportunity for grantees to use this assistance in areas impacted by recent disasters to carry out **strategic and high-impact activities** to mitigate disaster risk and reduce future losses."

The Federal Register Notice allocating these CDBG-MIT funds is clear that "[t]he level of CDBG-MIT funding available to most grantees cannot address the entire spectrum of known mitigation and resilience needs."<sup>3</sup> Consistent with the structure of the Federal disaster recovery system, "HUD restates that disaster recovery is a partnership between Federal, state, and local government and CDBG-MIT grantees should invest in their own recovery . . . HUD expects grantees to contribute to their recovery through the use of reserve or "rainy day" funds, borrowing authority, or retargeting of existing resources."<sup>4</sup> There are also additional Federal funds to address mitigation needs, including FEMA's Hazard Mitigation Grant Program.

The United States Department of Housing and Urban Development (HUD) emphasized that "[u]nlike other forms of Federal disaster-recovery assistance, CDBG-DR and CDBG-MIT grants have a statutory focus on benefitting vulnerable lower-income people and communities and

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<sup>2</sup> Residents of Harris County made up 51% of the population eligible for CDBG-MIT awards but received only 9% of the Statewide Grant Competition Funds. Four smaller jurisdictions within Harris County received funding awards totaling \$90 million.

<sup>3</sup> 84 FR 45840

<sup>4</sup> 84 FR 45839 ("The ultimate value of this mitigation funding appropriation is not limited to the projects and activities implemented with the funds but will also encompass how state and local partners are motivated to improve many of their governmental functions to better position jurisdictions to be resilient in the face of future disasters.")

**targeting the most impacted and distressed areas.”<sup>5</sup> “All grantees must prioritize the protection of LMI individuals and describe in the action plan how their proposed programs and projects will reflect that priority.”<sup>6</sup>**

The State of Texas Hurricane Harvey Action Plan for CDBG-MIT funding, approved by HUD on March 31, 2020, allocated \$2.1 billion to a Hurricane Harvey State Mitigation Competition State Competition), split into two rounds.<sup>7</sup> The awards for the first round of competitive mitigation grants were announced in May 2021. The hardest hit areas of the state, including Harris County, the City of Houston, Jefferson County, and Nueces County, were not awarded any funding. In response, instead of addressing the discriminatory flaws in its allocation and scoring criteria, the State of Texas proposed Action Plan Amendment 1 (Amendment 1), which eliminated the second round of the State Mitigation Competition, allocated \$750 million to Harris County, and reallocated remaining State Competition and other CDBG-MIT funds totaling \$666.9 million to the Regional Mitigation Program – Council of Governments Method of Distribution. H-GAC was allocated \$488.7 million under the Regional Mitigation Program.<sup>8</sup>

According to H-GAC’s own data, Harris County had the largest number of households impacted by Hurricane Harvey, the largest disaster damage score, the largest LMI population, and the highest population in the floodplain.<sup>9</sup>

Under Amendment 1: Appendix F,

In order to determine the distribution funds for the COG MOD program for counties impacted by Hurricane Harvey, the GLO designed an allocation methodology that accounts for risks to natural hazards, social vulnerability, financial capacity, and population. These four factors form the basis for a weighted sum model that results in a final relative factor that determines the amount of funds to be allocated to each eligible county. Throughout this discussion it should be noted that HUD MID and State MID allocations are split, with 80 percent of funds going towards HUD MID areas, and 20

<sup>5</sup> 84 FR 45838 (Friday, August 30, 2019). Emphasis added.

<sup>6</sup> 84 FR 45856.

<sup>7</sup> State of Texas Action Plan for Community Development Block Grant Mitigation (CDBG-MIT) Funds. Available: <https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-ap.pdf> See also: Texas General Land Office. (2020, March 27) “CMR. GEORGE P. BUSH APPLAUDS HUD APPROVAL OF THE STATE ACTION PLAN FOR \$4.3 BILLION IN DISASTER MITIGATION FUNDS” [Press Release]. [Link](#). The Action Plan also included an allocation of \$500 million for a Regional Mitigation Program distributed through the MOD process which did not take place before the State proposed Amendment 1 to the Action Plan.

<sup>8</sup> State of Texas CDBG Mitigation (CDBG-MIT) Action Plan Amendment 1. Available: <https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-sap-amend-1.pdf>

<sup>9</sup> H-GAC Preliminary CDBG-MIT MOD, Attachment 2a – H-GAC Allocation Summary Calculation Worksheets.

percent going to State MID areas; as a result, the calculations described below were performed separately for HUD MID and State MID areas. This section of the appendices explains the rationale for the use of each factor, the source of data for that factor, and the calculations performed to generate the MOD.<sup>Ac</sup>

GLO and H-GAC's methodologies produced the following allocations:

<b>H-GAC County</b>	<b>GLO Allocation per County</b>	<b>MOD Allocation per County</b>
Austin	\$7,472,000	\$6,750,100
Brazoria	\$42,281,000	\$64,452,700
Chambers	\$31,138,000	\$17,610,100
Colorado	\$6,646,000	\$6,302,700
Fort Bend	\$48,369,000	\$74,736,600
Galveston	\$44,367,000	\$88,727,300
Harris	\$148,450,000	\$0
Liberty	\$48,397,000	\$26,910,400
Matagorda	\$8,107,000	\$12,622,500
Montgomery	\$47,707,000	\$61,634,100
Walker	\$9,221,000	\$2,256,200
Waller	\$11,112,000	\$10,084,400
Wharton	\$35,495,000	\$17,673,400
H-GAC COG	\$0	\$62,000,200
<b>Total:</b>	<b>\$488,762,000</b>	

Under the formula GLO used to allocate funding for the Regional MOD Program Harris County accounted for 30% of the funding HGAC received. If Harris County had been excluded from the regional allocation, H-GAC's allocation would have been reduced by \$148 million.

That GLO intended for Harris County to receive money from the regional allocation funding is also evident from its response to comments on Action Plan Amendment 1. More than 50 commenters stated that Houston or Harris County needed additional funding beyond the \$750 million.<sup>10</sup> In response to at least 14 of these comments, GLO stated that Houston could "participate in the required Public Planning Meeting and second public hearing on the draft

<sup>Ac</sup> Action Plan Amendment 1: Appendix F, at 319.

<sup>10</sup> Texas General Land Office, (2022, March 18) State of Texas CDBG Mitigation (CDBG-MIT) Action Plan Amendment 1. [Report]. pg347

Houston-Galveston Area Council (H-GAC) Method of Distribution...”<sup>11</sup> expressing the state’s clear expectation that Harris County and Houston would receive an allocation through the Regional MOD Program process. The GLO created a formula for H-GAC to receive money that included Harris County and repeatedly said that Harris County was eligible for funding through the Regional MOD Program process; excluding Harris County from the H-GAC MOD does not comply with the state’s HUD-approved Action Plan.

Further, while H-GAC claims that it is excluding Harris County because it has been allocated other CDBG-MIT funding, H-GAC is not excluding other jurisdictions that have already received CDBG-MIT funding. Of the 14 counties that would receive funding through the preliminary MOD, 12 counties (including jurisdictions within that county) were awarded a total of over \$333.6 million in the State Grant Competition. The City of Dickinson, for example, received a \$50 million grant through the State Grant Competition, and the MOD allocates the city an additional \$15 million.<sup>12</sup>

<b>County</b>	<b>HUD or State MID</b>	<b>Population</b>	<b>Per Capita Funding (State Grant Competition)</b>	<b>Per Capita Funding (MOD)</b>	<b>Total Per Capita CDBG-MIT Funding</b>
Austin	State	28,625	1,600.00	225.82	1,825.82
Brazoria	HUD	321,110	48.58	175.11	223.69
Chambers	HUD	36,965	94.68	413.66	508.34
Colorado	State/HUD zip	20,405	-	295.11	295.11
Fort Bend	HUD	652,615	72.78	94.50	166.83
Galveston	HUD	302,490	591.76	262.82	854.58
Harris	HUD	4,316,070	20.94	173.7*	194.71*
Liberty	HUD	71,365	46.24	312.28	358.52
Matagorda	State/HUD zip	36,180	221.12	343.09	786.21
Montgomery	HUD	499,290	-	104.43	104.43
Walker	State/HUD zip	48,970	134.78	31.21	165.99
Waller	State/HUD zip	41,025	226.69	205.05	431.74
Wharton	HUD	40,730	363.37	424.11	787.48

<sup>11</sup> *Ibid.* pgs 360, 361, 362, 368, 371, 384, 397, 399, 400, 403, 404, 407, 409, 410.

<sup>12</sup> The City of Dickinson has a population of 21,697 and a homeownership rate of 79.6%. The population is 50.9% Non-Hispanic white, 39.4% Hispanic or Latino, and 7.4% Black. U.S. Census, <https://www.census.gov/quickfacts/fact/table/dickinsoncitytexas/DIS010220>

Table 1: Per capita funding by county from the State Grant Competition.<sup>13</sup>

\*Assuming the inclusion of the \$750 million allocation to Harris County.

Even including Harris County's separate \$750 million allocation, Harris County's per capita CDBG-MIT allocation only increases to \$194.71 per capita, the fourth lowest in the region.<sup>14</sup>

On March 4, 2022, HUD issued a Letter of Finding Noncompliance with Title VI and Section 109 (Case No. 06-21-1483). HUD found that the General Land Office's (GLO) design and operation of the Hurricane Harvey State Mitigation Competition "discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents." In other words, the State Mitigation Competition awards were based on a set of criteria that discriminated against Texans on the basis of race, color, and national origin; H-GAC's failure to account for previous discriminatory allocations in its MOD perpetuates that discrimination and is in itself discriminatory.

H-GAC's decision to exclude Harris County, where 72% of the region's people of color live, from its MOD on the basis that Harris County was receiving other CDBG-MIT funding but allowing other jurisdictions who had received CDBG-MIT funding based on a discriminatory allocation process to receive MOD allocations is particularly egregious. However, the fact that the MOD does not account for previous discriminatory allocations resulting from the entire State Mitigation Competition program means that H-GAC's MOD also discriminates against H-GAC residents who live outside of Harris County on the basis of race, color, and national origin.

## II. H-GAC's MOD is Discriminatory on the Basis of Race, Color, and National Origin

Title VI of the Civil Rights Act of 1964 mandates that "[n]o 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 be subjected to discrimination under any program or activity receiving Federal financial assistance."<sup>15</sup> Similarly, Section 109 prohibits discrimination the basis of race, color, national origin, religion, or sex in "any program or activity funded [under the Housing and Community Development Act of 1974.]"<sup>16</sup> The Fair Housing Act not only prohibits discrimination but requires all entities administering housing and community development

<sup>13</sup> GLO, "Announcement: Mitigation Competition Awards by County". Available:

<https://recovery.texas.gov/mitigation/programs/mitigation-competitions/mitigation-competitions/index.html>

These funds were not all awarded to the County itself, the total funding represents awards to both a county and/or to jurisdictions within that county.

<sup>14</sup> Of the four counties with the lowest per capita CDBG-MIT funding, three have Black populations of 20.3% to 23.4%.

<sup>15</sup> 42 U.S.C. 2000d; 24 C.F.R. 1.4(a).

<sup>16</sup> 42 U.S.C. 5309; 24 C.F.R. 6.4(a).

funds - including CDBG-DR and CDBG-MIT funds- to do so “in a manner to affirmatively further [fair housing].”<sup>17</sup>

Both the exclusion of Harris County from the MOD and the MOD itself subject H-GAC residents to discrimination on the basis of race, color, and national origin and violate the Fair Housing Act.

On March 4, 2022, HUD issued a Letter of Finding Noncompliance with Title VI and Section 109 (Case No. 06-21-1483). HUD found that the General Land Office’s (GLO) design and operation of the Hurricane Harvey State Mitigation Competition “discriminated on the basis of race and national origin through the use of scoring criteria that substantially disadvantaged Black and Hispanic residents.”

County	Population	White Alone (%)	Number of People	Black or African American Alone (%)	Number of People	Hispanic or Latino (%)	Number of People	White alone, not Hispanic or Latino (%)	Number of People
Austin	30,380	87	26431	9.4	2856	28.7	8719	60.3	18319
Brazoria	379,689	73.3	278312	16.3	61889	32.3	122640	43.2	164026
Chambers	48,865	87.4	42708	8.4	4105	26.3	12851	63.0	30785
Colorado	20,630	83.2	17164	12.4	2558	32.2	6643	54.2	11181
Fort Bend	858,527	<b>53.4</b>	458453	21.9	188017	25.5	218924	30.2	259275
Galveston	355,062	80.1	284405	13.2	46868	26.4	93736	55.6	197414
<b>Harris</b>	<b>4,728,030</b>	69	<b>3262341</b>	20.3	<b>959790</b>	44.4	<b>2099245</b>	<b>27.7</b>	<b>1309664</b>
Liberty	97,621	86.6	84540	9.3	9079	34.3	33484	54.9	53594
Matagorda	36,344	83.8	30456	10.9	3961	<b>45.1</b>	16391	41.8	15192
Montgomery	648,886	86.7	562584	6.6	42826	26.4	171306	62.2	403607
Walker	77,977	72.9	56845	<b>23.4</b>	18247	18.7	14582	55.8	43511
Waller	59,781	71.4	42684	23.3	13929	32.4	19369	41.9	25048
Wharton	41,721	83.9	35004	13.5	5632	43.7	18232	42.6	17773

**Table 2: Demographic Breakdown of Counties within H-GAC<sup>18</sup>**

<sup>17</sup> 42 U.S.C. 3601 et. seq.; 42 U.S.C. 3608. H-GAC acknowledges its obligation to sign an AFFH certification on page 11 of the MOD Summary form.

<sup>18</sup> 2021 American Community Survey data, available at: <https://www.census.gov/quickfacts/TX>.

As laid out in Section I of these comments, the exclusion of Harris County from the H-GAC MOD is unjustified and contravenes the purpose of the CDBG-MIT program to address the greatest mitigation needs, focusing benefits on LMI residents, as well as discriminating against residents of Harris County on the basis of race, color, and national origin.

### **III. H-GAC Chose Allocation Distribution Factors and Weighting that Do Not Address the Greatest Mitigation Needs or Ensure Primary Benefit to LMI Residents**

In addition to H-GAC's decisions about which jurisdictions would be eligible for a MOD allocation, the COG's MOD allocation formula itself does not distribute funding consistent with the purposes of the CDBG-MIT program and the State Action Plan.

H-GAC's formula used four equally weighted distribution factors: households impacted; personal and real property damage; low- to moderate-income population; and, population within Floodplain (floodway, 100-year floodplain, and 500-year floodplain).

#### **A. Households Impacted**

H-GAC should be using the number of FEMA registrants rather than approved FEMA Individual Assistance applications. Overall, FEMA's denial rates after Hurricane Harvey were extraordinarily high. Denial rates are particularly high for lower-income households. Applicant households earning more than \$70,000/year were rejected for individual assistance only 10% of the time while applicants earning less than \$15,000/year were denied 46% of the time. This statistic does not reflect varying degrees of damage but rather varying degrees of access to the program and resources to navigate the bureaucratic hurdles, as well as subjective assessments by FEMA inspectors, many of whom had minimal training. FEMA not also routinely denies assistance applications of nonwhite and low-income survivors at dramatically higher rates than those of well-off white applicants, it provides substantially fewer disaster recovery resources to lower-income survivors and survivors of color. Following Hurricane Harvey in 2017, white residents of higher income neighborhoods received, on average \$60,000 of assistance, while black residents in low-income neighborhoods received, on average \$84.<sup>19</sup>

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<sup>19</sup> Cited by Diane Yentel in testimony before the House Transportation and Infrastructure Committee subcommittee on Economic Development, Public Buildings, and Emergency Management on July 28, 2020. At: <https://bit.ly/3hzpalq>

## B. Personal and Real Property Damage

FEMA's own National Advisory Council, chaired by Texas Department of Emergency Management Chief Nim Kidd, found that:

*[M]any FEMA programs do not consider the principle of equity in financial assistance relief. **Damage assessments are based on property ownership, which immediately focuses on the wealthier parts of a community, and disadvantages renters and the homeless population.** The Public Assistance Program most benefits communities that can afford to pay the required match and can navigate the complexities of the contracting agencies. **The Individual Assistance Program is more accessible to those with time, income, and access.***<sup>20</sup> (emphasis added)

H-GAC should not use of distribution factor that is based on property value.

The MOD allocation formula must account for the fact that FEMA damage amount data also undercounts damage to both lower-income renters and homeowners. If FEMA inspectors make a subjective assessment that a renter's personal property was not worth \$2000 or that damages to a home were not worth at least \$8000 or attribute a building's condition to "deferred maintenance" rather than storm damage - these disaster survivors are not included in FEMA data. Low FEMA damage assessments may not reflect less damage so much as the socioeconomic status of the neighborhood; wealthier communities will *prima facie* have higher property values and hence higher recorded damage. Lower-income people and communities have, by definition, lower value properties, a higher proportion of renters, and they receive fewer investments in public infrastructure. Nationally, in counties with major disasters (areas with at least \$10 billion in damages), white communities gained an average \$126,000 in wealth following the damage and recovery efforts. Communities of color lost up to \$29,000 on average in personal wealth following events like hurricanes and wildfires.<sup>21</sup> By relying on damage to property as a distribution metric, the HGAC MOD will shift CDBG-MIT resources towards higher-income areas, and potentially have a disparate impact on Black and Hispanic-Latino residents.

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<sup>20</sup> NAC Report at 12.

<sup>21</sup> Junia Howell and James R. Elliott, "Damages Done: The Longitudinal Impact of Natural Hazards on Wealth Inequality in the United States". *Social Problems*, Oxford University Press (August 14, 2018). Available: <https://academic.oup.com/socpro/advance-article/doi/10.1093/socpro/spy016/5074453> and Rebecca Hersher, "How Disaster Recovery Favors the Rich", *All Things Considered*, National Public Radio (March 5, 2019). Available: <https://www.npr.org/2019/03/05/688786177/how-federal-disaster-money-favors-the-rich>

### C. Low-to-Moderate Income Population

By providing equal weight to the LMI measure, which favors lower-income areas, and the FEMA Real and Personal Property Damage measures, which favors higher-income areas, HGAC may have set up an equation that is neutral on economic factors and does not prioritize the protection of LMI individuals as required by Federal law and the Federal Register Notice allocating these funds. Low-income families face additional barriers to disaster recovery, so HGAC must either provide a higher weight to the LMI distribution factor or add a supplementary factor that will ensure equitable distribution of CDBG-MIT funds, for example, the Social Vulnerability Index (SVI).<sup>22</sup>

Applying the Social Vulnerability Index to the HGAC region at the census tract level reveals that the majority of extremely vulnerable areas (defined here as having an SVI score of greater than 0.8) are located within Harris County (see Appendix Figure 1). Over one million people reside in the 207 extremely vulnerable census tracts in Harris County and approximately 200,000 people live in the 31 extremely vulnerable census tracts in HGAC outside of Harris County. Again, even excluding Harris County, CDBG-MIT funds may not be allocated to prioritize the most impacted and distressed areas where vulnerable populations live. The Social Vulnerability Index is the best metric available for assessing disaster vulnerability and should be included in the HGAC MOD.

### IV. Inadequate Public Process

HGAC did not provide adequate time for public participation prior to the drafting of this MOD. HGAC only provided one week of notice about the Public Planning Meeting on February 3rd, 2022. Following the Public Planning Meeting, the public was only given 24 hours to provide written comment. Several attendees of the February 3rd meeting, including representatives from the City of Kendleton and nonprofits like Connective, noted that they had only heard about the meeting on the day of the meeting. HGAC failed to provide information on the distribution factors being considered prior to the meeting, so the public did not have sufficient information to draft comments prior to February 3rd. The CDBG-MIT MOD is a highly technical process and therefore the general public requires more than a single day to process and respond to proposed MOD factors. A public comment period of less than 24 hours is unreasonable and denies the public the opportunity to make informed and meaningful comment on the development of a MOD that will distribute almost half a billion dollars in federal mitigation funding.

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<sup>22</sup> Like H-GAC's other distribution factors, SVI is a widely used measure that draws from public databases.

## V. H-GAC Should Not Have Requested Waivers of Program Requirements

The Regional MOD Program requirements set out in Action Plan Amendment 1 were designed to ensure that CDBG-MIT were used in accordance with the appropriating legislation and FR Notice and should not be waived. For the reasons set out below, H-GAC should not have requested waivers of program requirements. Further, these waivers should not have been requested without public notice and an opportunity for the public to review the justification for these waiver requests and provide comment.

### A. Minimum Threshold Waiver

HGAC should not have requested a waiver of the \$1 million minimum grant amount and GLO should not have approved that waiver. CDBG-MIT funding is not an additional pot of CDBG-DR funds, but a new source of funding intended to support, as the State’s Action Plan states, “**regional investments with regional impacts in risk reduction**”. Even if these funds are distributed to local grantees, CDBG-MIT grants should be prioritized for larger-scale projects that mitigate risks to as many households as possible. The \$1 million minimum grant amount is itself too low; the \$3 million threshold for the State Grant Competition is a more appropriate minimum grant amount and in accordance with our previous comments on the State Action Plan, we do not believe that threshold should have been reduced from \$5 million to \$3 million.

Congress and HUD also emphasized that CDBG–MIT funds should be used “to carry out **strategic and high-impact activities** to mitigate disaster risks and reduce future losses.”<sup>23</sup> The MOD process generally, which is designed to suballocate funds to individual jurisdictions without consideration of the most effective and strategic use of those funds, contravenes the intent of the CDBG-MIT appropriation; providing individual jurisdictions with small grants that forces them to propose projects prioritized by price and compete against other jurisdictions rather making large-scale strategic regional investments frustrates the goal of effective large-scale mitigation.

### B. Low-to-Moderate-Income Threshold Waiver

GLO’s decision not to grant H-GAC’s request for a waiver of the LMI threshold for CDBG-MIT was correct, and H-GAC should not have requested such a waiver in the first place. HUD has

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<sup>23</sup> 84 FR 45383

already provided a waiver that reduces the LMI threshold from 70% to 50%. CDBG-MIT funds are not merely another source of potential funding for mitigation projects, **“CDBG-MIT grants have a statutory focus on benefitting vulnerable lower-income people and communities and targeting the most impacted and distressed areas.”**<sup>24</sup>

“Disasters are often depicted as great levelers, victimizing rich and poor alike. The effects of disasters on populations are anything but random... The disaster vulnerability of individuals and groups is associated with a number of socioeconomic factors that include income, poverty, and social class; race, ethnicity, and culture; physical ability and disability; language competency; social networks and social capital; gender; household composition; homeownership; and age... The same factors that disadvantage members of society on a daily basis also play out during disasters.”<sup>25</sup>

Pre-existing disparities in infrastructure, storm protection, and geographic and social vulnerability are exacerbated by disasters, and response and recovery programs, policies, and activities that do not affirmatively address these disproportionate impacts perpetuate inequity and increase the vulnerability of underserved groups and communities.<sup>26</sup> Homes in formerly redlined neighborhoods, for example, are at higher risk of flooding than homes in historically greenlined neighborhoods seven decades after the HOLC redlining maps were created.<sup>27</sup> To the extent LMI status is correlated with protected class status under Title VI, Section 109, and the Fair Housing Act, reducing the benefit to these communities may also violate civil rights law.

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<sup>24</sup> 84 FR 45838 (Friday, August 30, 2019). Emphasis added.

<sup>25</sup> Kathleen J. Tierney, *The social roots of risk: Producing disasters, promoting resilience*, (Stanford, CA: Stanford Business Books, 2014), 141.

<sup>26</sup> See, e.g., Thomas Gabe, Gene Falk, Maggie McCarty, and Virginia Mason, Hurricane Katrina: Social-Demographic Characteristics of Impacted Areas, Congressional Research Service Report to Congress (November 5, 2005); Alice Fothergill and Lori Peek, Poverty and Disasters in the United States: A Review of Recent Sociological Findings, *Natural Hazards* 32: 89–110, 2004; and, Shannon Van Zandt, Walter Gillis Peacock, Wesley E. Highland, and Samuel D. Brody, “Mapping social vulnerability to enhance housing and neighborhood resilience”, *Housing Policy Debate* 22(1):29-55 (January 2012).

<sup>27</sup> Kriston Capps and Christopher Cannon, “Redlined, Now Flooding: Maps of historic housing discrimination show how neighborhoods who suffered redlining in the 1930s face a far higher risk of flooding today.” Bloomberg City Lab, March 15, 2021. Available at: <https://www.bloomberg.com/graphics/2021-flood-risk-redlining/> (“Put another way, 8.4% of homes in historically redlined neighborhoods face high flood risks nationwide, compared to 6.9% of homes in historically greenlined neighborhoods. These patterns represent disparities in development compounded by decades of disinvestment.”)

Please don't hesitate to contact us if you have questions or concerns about our comments.

Sincerely,

Madison Sloan

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Meg Duffy

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Texas Appleseed

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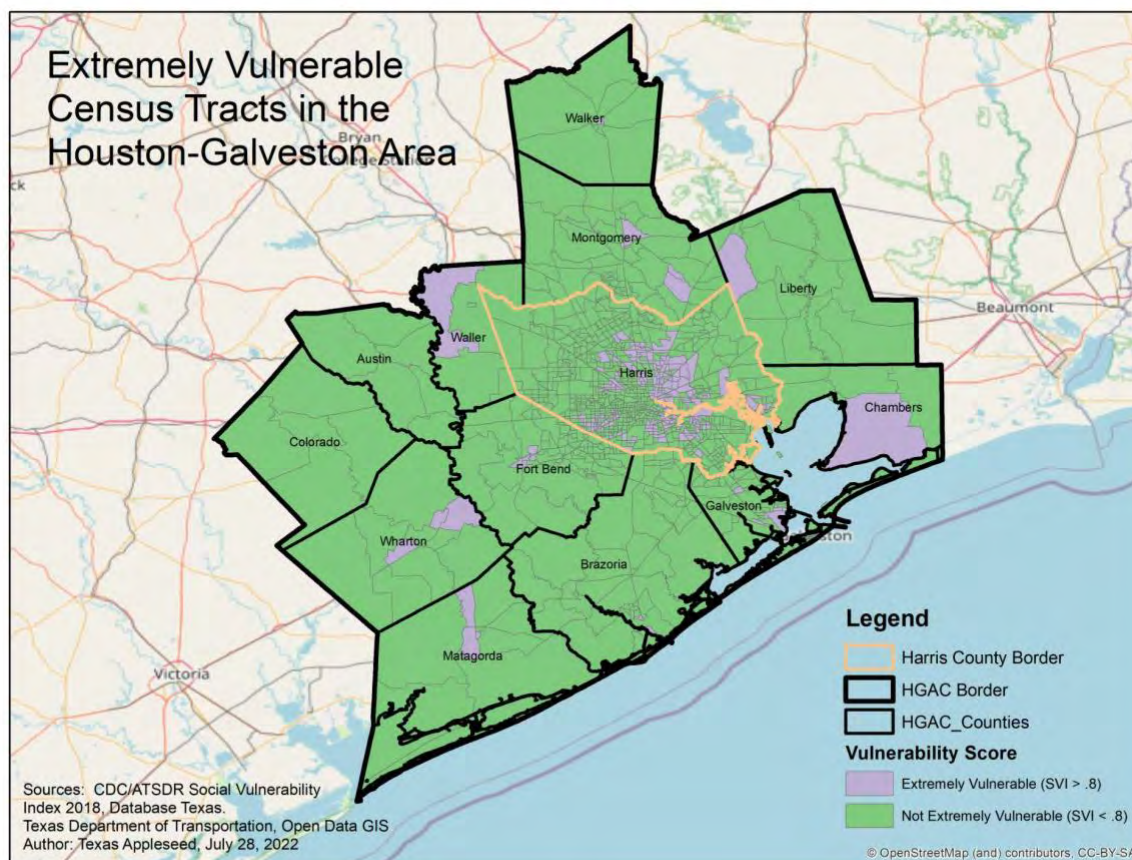
Ayanna Jolivet McCloud

Executive Director

Bayou City Water Keeper

## Appendix

Figure 1.



County	Total	Percentage				
		People of Color	POC	Hispanic	NH-White	Black
<b>HGAC</b>	<b>7,151,728</b>	<b>4,586,638</b>	<b>64%</b>	<b>2,664,429</b>	<b>2,565,090</b>	<b>1,200,668</b>
Austin	29,892	<b>11,471</b>	<b>38%</b>	8,139	18,421	2,543
Brazoria	368,062	<b>198,375</b>	<b>54%</b>	114,094	169,687	51,837
Chambers	42,571	<b>14,436</b>	<b>34%</b>	9,870	28,135	3,277
Colorado	21,357	<b>9,492</b>	<b>44%</b>	6,455	11,865	2,665
Fort Bend	790,892	<b>536,187</b>	<b>68%</b>	194,349	254,705	156,577
Galveston	337,600	<b>146,039</b>	<b>43%</b>	84,243	191,561	41,643
Harris	4,680,609	<b>3,323,857</b>	<b>71%</b>	2,016,625	1,356,752	865,997
Liberty	86,173	<b>33,181</b>	<b>39%</b>	23,051	52,992	8,145
Matagorda	36,791	<b>20,944</b>	<b>57%</b>	15,850	15,847	3,788
Montgomery	590,188	<b>207,033</b>	<b>35%</b>	144,951	383,155	29,373
Walker	72,295	<b>31,665</b>	<b>44%</b>	13,066	40,630	16,575
Waller	53,626	<b>30,670</b>	<b>57%</b>	16,312	22,956	12,989
Wharton	41,672	<b>23,288</b>	<b>56%</b>	17,424	18,384	5,259
Harris %	65%	72%		76%	53%	72%

US Census Bureau. (2022). American Community Survey, 2016-2020. *Table DP05*.