

CDBG MOD Hurricane Harvey
Public Comments – July 10, 2018

#	DATE RCVD	FORM	SUBMITTED BY	CATEGORY	COMMENTS
1	5/31/2018	Email / Letter	Judge Sylvia, Chambers County	* Allocation * Formula * Community-Specific	<ol style="list-style-type: none"> 1. Why is Baytown included in part of the HGAC allocation? The portion of Baytown that is within the Chambers County limits has relatively little population and none of it is LMI. Additionally, Baytown will likely be included in the Harris County direct allocation where they stand to receive a significant allocation. We would recommend that Baytown's allocations for both Buyout/Acquisition and Infrastructure be re-allocated to Chambers County. 2. What is the process for allocating funds to jurisdictions with little-to-no LMI populations. For example, the City of Friendswood and League City are allocated approximately \$9.7 million for Buyout/Acquisition and \$9.4 for Infrastructure. Since 70% of the allocation must be spent on LMI projects, how does Friendswood and League City expect to expend these large allocations - which are significantly more than Chambers County? It does not seem right to allocate funds to a community and let these funds sit when they could be re-allocated to another community where they can be spent in accordance with the CDBG regulations. 3. I noticed that the methodology accounts for raw figures based on FEMA's "IA" as well as "Weighted Damage Levels" (<i>which is not clearly defined</i>). However, does this data assess the damage assessment based on damage claims per capita? In other words, given Chambers County's relatively low population totals compared to other county's and jurisdictions, is consideration given based on the total damage reported and/or claimed per capita compared to other jurisdictions similar reports and claims? If so, where is this detailed? If not, we would recommend this assessment be conducted to ensure a fair allocation of resources.
2	6/19/2018	Email / Letter	Judge Spenrath, Wharton County	* Allocation * Formula * Community-Specific	<p>I respectfully request that you and HGAC staff please generate at least two additional allocation formulas for regional distribution of upcoming CBDG Disaster Recovery Funds as related to Hurricane Harvey relief efforts.</p> <p>My two asks: 1) Please generate a new plan that FITst sets aside a \$10 million base allocation for any and all HUD designated governmental entities (cities/conn ties) that experienced housing damage in excess of 25% of their total qualified housing units. All governmental entities experiencing less than 25% total housing damage would then follow HGAC's currently proposed allocation system utilizing the remaining balance of CBDG grant fndds for infrastructure improvements.</p> <p>Ex/ Wharton County recorded 2,210 damage claims out of a county total 7,799 housing units. Thus, Wharton County's percentage of housing damage is 28.34% and would thereby qualify for the upfront \$10 million base set aside.</p> <p>2) Please generate a new allocation plan that removes Wharton County from the HUD grouping of <i>HUD Most Impacted Areas</i> (80% designated funding) and in turn place it in the grouping labeled <i>State Most Impacted Areas</i> (20% designated funding).</p>
3	6/21/2018	Online Comment Form	Joel Hardy, City of Pearland (Brazoria County)	* Methodology * Comment for GLO	<ol style="list-style-type: none"> 1. Future documentation outlining the Method of Distribution (MOD) should specify that a County's allocation is for unincorporated areas AND/OR those that do not have allocations of \$1 million (buyouts) or \$100,000 (infrastructure). Not doing so leaves this to question. 2. The State should clarify the applicable rules for planning purposes, as there have been a number of conflicting responses related to regulatory matters involving certain requirements/provisions: a. The City has received various, conflicting responses from the State to the question as to whether a jurisdiction that is an Exception Grantee can utilize its exception percentage for planning purposes OR the typical 51% or more below-moderate income for an area-benefit project. A fact sheet or FAQ should be created to clarify. b. The State should clarify the interpretation of rules related to the requirement that no less than 70% of CDBG funds must be used on activities that serve those that are low-moderate income. The sentiments expressed at the June 6, 2018 meeting at HGAC indicate there is confusion. A fact sheet or FAQ should be created to clarify. 3. The regional council of government and/or the State should provide potential subrecipients with any and all State CDBG program statutes/regulations that will apply to the use of CDBG-DR funds, indifferent to those that normally apply to Participating Jurisdictions and/or

					Entitlement Jurisdictions as direct recipients of CDBG funds. 4. The State should solicit more information directly from potential subrecipients about the damages Hurricane Harvey caused in their communities, as FEMA's process may fail to capture all losses incurred by cities and/or counties in the disaster-affected region.
4	6/22/2018	Online Comment Form	David Douglas, Grant Administrator (Liberty County)	* Allocation * Formula * Community-Specific	Excluding Harris County, there are 12 other counties in the HGAC Region. Earlier information has indicated that Liberty County will receive up to approximately 11 million dollars for housing and infrastructure. As an issue of distribution, HGAC should take the sum of available funding and award same on even percentages for the 12 remaining counties.
5	6/25/2018	Online Comment Form	Jimmy Henry, Commissioner (Walker County)	* Community-Specific	Jeff, I'm hoping that the funds proposed for Walker County will remain the same. As you know, our County is an economic disadvantaged county. Out of all 254 counties, we rank the 12 poorest due to all the state and federal land that is not taxable in our county. I would appreciate your consideration in leaving the proposed funds as is. Thanks, Jimmy Henry
6	6/27/2018	Online Comment Form	Mindi Snyder, City of El Campo (Wharton County)	* Allocation * Community-Specific	The City of El Campo did not suffer damage due to Hurricane Harvey, but like many other entities, we have many unmet needs and mitigation funding for flooding is something that would certainly help development in our City and we intend to try to apply for funding as Wharton County is included in the allocation. The problem with the funding allocation is that is it not remotely equitable as Wharton County had the most damage in terms of actual homes and received far less funding than others with less damage. The County is limiting funding to the City in any manner, including assistance with improving a gravel road that will serve a 540 Acre Rail Served Industrial park that the City is working to obtain because they have spent so much on Harvey and have nothing so we are trying any method we can to try to make improvements locally as we do flood when we have a severe rain event and this unfair allocation limits our ability to be funded.
7	6/29/2018	Oral Comment	R. Pennington, City of Cleveland (Liberty County)	* Reallocation * Community-Specific	The City of Liberty is supportive of Cleveland's rank as 5th on the re-allocation ranking. The City requests the quick release of allocated funds.
8	6/29/2018	Oral Comment	Montgomery County - Name not provided	* GLO Requirements	The Montgomery County takes issue with the 70% low-to-moderate income level requirement. The County takes issue with its inability to swap infrastructure and / or housing funds within its allocation, as well as with other entities. The County has sought / may seek a waiver regarding the 70% low-to-moderate income level requirement with GLO.
9	7/2/2018	Online Comment Form	Morad Kabiri, City of Friendswood (Galveston County)	* Allocation * Community-Specific	Due to a limited number of potentially eligible recipients for Buyouts/Acquisitions, the City of Friendswood would like consideration for the transfer of allocated funds from Housing to Infrastructure. Public infrastructure projects have been identified that would have a far more significant impact (positively) to homeowners damaged by Harvey; by reducing the potential for damage from future storms.
10	7/2/2018	Online Comment Form	Kate Rainey, Texas RioGrande Legal Aid (Galveston County)	* GLO Requirements	The State Action Plan on p.87 lists the Local MOD requirements. One of these requirements is to have a plan to meet the 70% low- and moderate-income targeting requirements. Can you confirm how HGAC took these income targeting requirements into account? Please provide a copy of the plan for public review on your website as soon as possible. Thank you.
11	7/4/2018	Email / Letter	Sherry McKibben, City of Huntsville (Walker County)	* Allocation * Community-Specific	I was nice seeing everyone again. I would like HGAC to consider this when deciding on the distribution of Harvey funding. While I know we did not suffer as much as some, we did and still do have damage. So, please consider how much funding those areas that have received direct funding from the Federal Government and/or are entitlement areas. These areas have received a lot of funding, but the rest of us have not received anything. We need help also and when we are competing at every level, I would hope that our COG would support all the areas by considering who has an has not received funds to help rebuild.

12	7/6/2018	Online Comment Form	Nicole Walliser (Galveston County)	* Outside Purview	The city of Friendswood has built a 60" drain to end the back of the Laurelfield subdivision and ties new downtown development into this drain. There is no retention basin, and it ends short of clear creek. Since its installation the homes on Quaker Bend seem to have flooded more frequently. Then Harvey created a first-time flood for the homes in our development. Upstream development into a bottlenecked Clear Creek is exacerbating this situation as well. Harris county projects appear to address upstream but I have yet to see a path forward on debottlenecking downstream. Please require drainage improvements be made with consideration of downstream impact, and debottleneck clear creek downstream/throughout Friendswood.
13	7/6/2018	Online Comment Form	Maria Salas (Galveston County)	* Outside Purview	How about the people in this area. Nothing has been done since Harvey. Can we get an estimate on a buyout or have our home raised? Where are all the millions of dollars going?SMH
14	7/6/2018	Online Comment Form	Ronald Lovely (Galveston County)	* Allocation	(1) A non-Harris County/Houston jurisdiction should be allocated the same average \$s per damaged structure as Harris County/Houston. (2) Waivers should be granted for jurisdictions that show they will use the funds for improvement plans that save 5 homes for every one that they buy. (e.g. Clear Creek drainage plans being discussed by the City of Friendswood). (3) Funds should be denied for upstream projects on Clear Creek unless the projects include funding for down stream cities to drain the water they get from upstream cities in a Harvey-like or Allison-like or Claudette-like storm.
15	7/6/2018	Online Comment Form	Sarah Van Riper (Galveston County)	* Allocation	I think we need to widen and straighten Clear Creek especially downstream of Dixie Farm and build a canal for the water to get to the Gulf at Chocolate Bay. Similar to the successful Highland Bayou diversionary canal that was built to drain Santa Fe. This solution will require buying out homes too close to the creek. There are many examples all over the country where a diversionary canal solved a city's flooding problems. The area can be turned into parklands that will attract businesses and increase property values.
16	7/6/2018	Online Comment Form	Deborah January-Bevers, Houston Wilderness (Fort Bend County)	* General	Houston Wilderness voices our support for H-GAC's Hurricane Harvey Funding Draft Method of Distribution. This allocation for disaster funding, and accompanying State Action Plan, will allow implementation of critically-impacted buyouts and proposed nature-based infrastructure (NBI) projects for our region, including funds for maintenance, drainage, detention, mitigation and erosion control. All these efforts will make our region stronger as large rain and wind events continue to occur across our rural, suburban and urban landscapes. Houston Wilderness works with a broad-based alliance of business, environmental and government groups to protect, preserve and promote the 10 ecoregions in our 13+ county region. We do so by convening, problem-solving and educating on various aspects of these ecoregions and their capacity to decrease repetitive flooding, improve air & water quality, prevent land erosion, boost outdoor recreation, ecotourism and economic growth. Extensive local research by Houston Wilderness and the Gulf-Houston Regional Conservation Plan Steering Committee has determined that 9.3% of land-use in the 8-county region is currently protected and preserved in some long-term capacity, including all current detention areas, parks, reservoirs, riparian and coastal rights-of-way, and other designated open spaces. Our research shows that for long-term regional resilience, we need to maintain and restore the diverse ecological uses and benefits of this current 9.3% of nature-based Infrastructure and open space while also substantially increasing the percentage of land to 24% (a 14.7% increase) of preserved and protected NBI to account for our region's projected growth. (See more at http://www.gulfhoustonrcp.org/) This Hurricane Harvey Funding Draft Method of Distribution will substantially contribute to a percentage increase in protected/preserved land-use throughout our region and serves as a critical step in creating a resilient region for all the counties involved in Harvey recovery and restoration.
17	7/6/2018	Online Comment Form	Tim Barker, City of Wharton (Wharton County)	* Allocation * Community-Specific	Both the City of Wharton and Wharton County allocations have been severally under funded in comparison to State Most Impacted Counties (State MIC) as a result of being designated a HUD Most Impact County (HUD-MIC). The Board is requested to adjust the allocations by removing Wharton County from the HUD-MIC list to the State MIC list. This action will more accurately allocate resources to our city and county. A small rural county cannot reasonably be compared to larger urban counties when determining impacts is limited only to the number of households impacted. Regarding the proposed Reallocation Procedure, it seems that a prorated basis should be considered rather than a simple ordered listing as proposed. It is noted that Wharton city percent of total damage claims is not listed. Surely the percentage is higher than the lowest provided of 2.38%.

18	7/6/2018	Online Comment Form & Email / Letter	Brennan Griffin, Texas Appleseed (Fort Bend County)	<ul style="list-style-type: none"> * Allocation * Formula * Community-Specific * Comment for GLO * General 	<p>We appreciate the opportunity to provide comments on the HGAC’s Method of Distribution (MOD) covering \$240,705,199 in Community Development Block Grant for Disaster Recovery (CDBG-DR) funds allocated by the State of Texas in its Action Plan.</p> <p>Texas Appleseed is a public interest justice center that works to change unjust laws and policies that prevent Texans from realizing their full potential. Since Hurricanes Katrina and Rita in 2005, Texas Appleseed has worked with a network of organizations in Texas, including housing advocates, policy experts, and grassroots community groups, to ensure that all Texas families are able to recover in the wake of a natural disaster, that communities are rebuilt to be more resilient, and that all families have the opportunity to live in safe, decent neighborhoods with equal access to educational and economic opportunity.</p> <p>We do not believe that H-GAC’s MOD is compliant with GLO requirements as it does not follow the MOD form provided by GLO and consists only of data and allocation tables. It provides no further information on the details of the buyout or infrastructure programs, nor does it contain any information on the public participation process, how HGAC’s MOD furthers long term recovery, unmet housing needs, the LMI income requirement, or affirmatively furthering fair housing. HGAC must produce a complete and compliant MOD for public comment.</p> <p>We offer the following comments on what needs to be included in HGAC’s MOD:</p> <p style="padding-left: 40px;">A. Local Buyout and Acquisition Program:</p> <p>Program guidelines for this program must be developed in a transparent process with extensive community input. Local communities must have a citizen participation process for drafting buyout guidelines. Regardless of whether these planned buyouts are voluntary or mandatory, relocating, away from an existing community or a home that has been in a family for generations, can be difficult and even traumatic. Without planning and community buy-in, a voluntary individual buyout program can result in a patchwork of empty and occupied homes, creating a blighted neighborhood. One of the critical issues in ensuring a successful buyout program is equity and ensuring that program rules and processes do not have a disparate impact on particular groups of homeowners.</p> <p>Local buyout and acquisition programs must also prioritize LMI households in floodways and floodplains, who have the least resources with which to relocate on their own, leaving them a choice between housing instability and potential homelessness, or continuing to live in homes that may be structurally compromised or present health risks because of mold. It is particularly critical for LMI families that this buyout program includes not only acquisition and demolition, but relocation payments and other assistance and incentives as well. As the Federal Register Notice states, “a buyout program that merely pays homeowners to leave their existing homes does not result in a low- and moderate-income household occupying a residential structure and, thus, cannot meet the requirements of the LMH national objective.” (83 FR 5863) Local buyout programs should include plans to build housing in safer areas.</p> <p>Low- and moderate-income households must be provided with enough funds that the choice to move is a realistic one (or to ensure that they can actually move to a safer area in the case of mandatory buyouts.) The worst-case scenario is that families who accept a buyout are unable to find housing in safer areas and are forced to move back into their original or less safe neighborhoods.</p> <p>The decision of whether to use pre- or post-storm home value is an important one. In particular, using the pre-storm value of a home to determine disaster recovery program benefit limits often has a discriminatory impact on the basis of race or ethnicity as well. Following Hurricane Katrina, the National Fair Housing Alliance (NFHA), the Greater New Orleans Fair Housing Action Center (GNOFAC), and African-American homeowners sued the State of Louisiana and the U.S. Department of Housing and Urban Development (HUD) alleging racial discrimination in the State’s CDBG-DR funded Road Home Program, which provided grants to homeowners to repair or rebuild their homes. The original grant formula was based on the pre-storm value of a home, which resulted in African-American homeowners receiving less repair money than White homeowners, because their homes were located in neighborhoods with lower home values based on market discrimination and the legacy of segregation. Many African-American families were left unable to complete repairs or return home or living in uninhabitable houses. As Louisiana Congressman Cedric Richmond said when the case was settled in 2011,</p> <p style="padding-left: 40px;"><i>[e]veryone knew that the Road Home formula for calculating grant awards was deeply flawed and punished folks in neighborhoods where home values were lower. . . After all, if two families are both rebuilding a three bedroom home then their construction costs will be the</i></p>
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We recommend that HGAC, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions.</p> <p>B. Local Infrastructure Program</p> <p>Resilience is the ability to withstand and recover from disasters quickly, in a way that mitigates future damage and vulnerability, and in a way that goes beyond physical infrastructure. Low-income communities and communities of color are disproportionately affected by and have a harder time recovering from a disaster because of both geographic and social vulnerability forced on them by segregation, discrimination, and often the cumulative effects of previous disasters, on wealth and access to opportunity. For its Natural Disaster Resilience Competition (NDRC) HUD defined a resilient community as one which “is able to resist and rapidly recover from disasters or other shocks with minimal outside assistance,” and that plan and implement disaster recovery that mitigates future threats “while also improving quality of life for existing residents and making communities more resilient to economic stresses or other shocks.” Improving the quality of life for existing residents and making them more resilient to other shocks, including economic stress that can push middle and working class families into poverty following a disaster, is at the core of our concern for equity in disaster recovery.</p> <p>Infrastructure programs must prioritize the needs of low- and middle-income households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. A key issue for many of these communities is environmental justice, as they were impacted not only by flooding but also by hazards related to chemicals, oils, sewage, waste or air pollution during the event. Neighborhoods that were doubly impacted by floodwaters polluted with chemicals, oils, waste, or sewage should be prioritized for mitigation as well.</p> <p>Also key to economic recovery and future resilience is ensuring that the jobs generated by recovery projects and programs are filled by local workers and those who lost jobs because of Harvey to create real jobs and job training for community residents, and create additional opportunities for community businesses. An economic development program that provides loans to small business will not be successful unless that business has access to a workforce. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge HGAC to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage HGAC and its subrecipients to do so.</p> <p>Other options for increasing the number of jobs going to affected individuals and communities are ensuring that contractor qualifications include a commitment to local hiring and best value bidding processes that give more points to bidders who can comply with job quality and targeted hiring standards. CDBG-DR presents an opportunity to leverage housing and infrastructure funds into economic development funds as well.</p> <p>C. Needs Assessment and Funding Allocation</p> <p>We appreciate that HGAC has used a weighting factor for share of total weighted damage to make a preliminary allocation of program funds. However, seeing as this methodology is based on misleading data and methodology provided by FEMA and HUD, we are concerned that HGAC will not be accurately addressing the critical housing and infrastructure needs of low and moderate income people in the area. The methodology provided by HUD and GLO for determining unmet housing needs underestimates the amount of loss to low-income populations. Using this</p>
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The conclusion, based on FEMA data, that families making less than 30% of Area Median Income (AMI), which, for example, is \$12,060 in the Beaumont-Port Arthur MSA and \$13,100 in in the Corpus Christi MSA, have been better able to recover than families making more than double that amount is simply not credible. The inaccuracy of this calculation is borne out by a study conducted by the Episcopal Health Foundation and the Kaiser Family Foundation three months after Hurricane Harvey. The study found that lower-income families and Black and Latinx Texans were less likely to have homeowners', renters', or flood insurance, and that,</p> <p><i>[n]early half (46%) say they or someone else in their household lost job-related income as a result of the storm, such as getting fewer hours at work (32%), losing a job entirely (12%) or losing income from a small business or unpaid missed days (32%). These income disruptions affected a greater share of Hispanic (65%) and Black (46%) residents compared to White residents (31%).</i></p> <p>Lower- and even middle-income families are less likely to have the savings and access to credit that let them access safe housing (including more immediate repairs) and are more likely to be forced to relocate far from jobs and schools, to live in overcrowded housing or double up with family or friends, remain in unsafe housing, or become homeless.</p> <p>2015 Pew Charitable Trust study found that less than half (45%) of American households have even one month's income in savings in case of an emergency. Lower income households are in an even more precarious situation, with only two weeks of savings. Those at the bottom of the income scale could only survive 9 days on their liquid assets. The study also indicates that even middle-income households could only scrape together about four months of income; it has been nearly 10 months since Hurricane Harvey.</p> <p>Pew also looked at disparities in liquid savings among various racial and ethnic groups and found that,</p> <p><i>[t]he typical white household has slightly more than one month's income in liquid savings, compared with just 12 days for the typical Hispanic household and only five days for the typical African-American household. In fact, a quarter of black households would have less than \$5 if they liquidated all of their financial assets, compared with \$199 and \$3,000 for the bottom 25 percent of Hispanic and white households, respectively.</i></p> <p>In addition, median white wealth is twelve times median black wealth, a disparity that can be traced to the history of segregation and discrimination in the United States, from government redlining to current lending discrimination.</p> <p>The primary purpose of the CDBG program is to benefit LMI populations, yet the HUD methodology the State and therefore HGAC using has the clear, disproportionate effect on LMI populations of excluding them from the unmet needs assessment conclusions. This disproportionate effect is not only on low- and moderate-income Texans, but on Black and Latinx populations as well.</p> <p>Using this methodology means that HGAC is budgeting for unmet housing needs with the expectation that most LMI households, who fall into lower level damage categories if they are represented at all, are not severely damaged and will not need their homes rebuilt. While the average FVL for non-LMI homeowners was about twice that of ELI owners, the average income for non-LMI owners is over 14 times that of ELI owners. This methodology underrepresents LMI housing needs by income level, particularly misrepresenting the level of unmet rental housing need for ELI families. HGAC's use of FVL damage categories to weight the geographic distribution of CDBG-DR funds, therefore, will end up allocating resources away from areas that need them the most, affecting not only those families, but those communities as a whole.</p> <p>Texas Appleseed supports the use of a data-based formula to allocate federal disaster recovery funds. But that formula must be adjusted to account for deficiencies in FEMA and other data and ensure that the needs of all Texans affected by Hurricane Harvey are taken into account. We strongly recommend that HGAC use the methodology proposed by the Texas Low Income Housing Information Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household's FVL to their income, thereby considering the level of impact on</p>
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19	7/6/2018	Online Comment Form	Amelia Adams, Texas Housers (Austin County)	<ul style="list-style-type: none"> * Allocation * Formula * Comment for GLO * General 	<p>Using FEMA-Verified Loss categories will reproduce inequality in disaster funding designation. FEMA damage levels (FVL) are not adequate to determine allocation of funding. They rely on personal property damage for renters, which undercounts these households, leaving them out of the calculation of need. The "weighted damage" calculation will also further undercount households that were found to have low FVL levels due to the pre-existing condition or low value pre-storm value of their home. As a result, H-GAC should not rely entirely on this data to determine where funding will be distributed. The income (and hence ability to pay) of disaster survivors should be considered when determining whether they will require funding to recover. One way to accomplish this is to utilize the methodology recommended by Texas Housers in response to the Draft Action Plan. This methodology factors in the income level (ELI/VLI/LI) of the household when a threshold for unmet need. In other words, there is a lower threshold for unmet need among lower income households because they are more likely to require outside aid to recover. More research and planning is needed to impactfully and equitably designate buyout funding. The Buyout and Acquisition Program's allocation methodology is seriously flawed. The first problem is that it assumes damage weights will reflect the suitability of these areas for buyouts, not to mention the fact that the damage was caused by flooding, as opposed to wind. Within the H-GAC region, the majority of Harvey damage claims appears to be, in fact, caused by flooding and not wind, which is not the case in all parts of the disaster area. However, there are areas such as Wharton County and the most-impacted zipcodes in Colorado County, where there are also considerable wind damage claims, according to the map provided in the GLO's State Action Plan. For those wind-damaged units, buyouts will not solve the problem, which is why it is necessary to distinguish between FVL caused by various forces in order to truly consider suitability of damaged homes for buyouts. Second, local jurisdictions and H-GAC must make use of data available through the National Flood Insurance Program about concentrations of repetitive loss properties in order to intelligently allocate this funding. The Community Rating System (CRS) offers jurisdictions advice on locating concentration areas of repetitive loss properties, collecting remote data on these properties and determining the cause of the ongoing flooding problems there. This type of investigation will be essential in locating areas that are suited to buyouts, as opposed to individual homes that were damaged and should be rebuilt with mitigation in mind or areas where poor infrastructure is to blame. Small amounts of funding are not sufficient to engage in a well-planned buyout program that doesn't result in "checker-boarding" of neighborhoods (lack of concentration of buyouts in affected areas) or strain on resources and city services (due to the continued need to serve areas that have been partially bought out). One million dollars, which is the cutoff for any jurisdiction to receive its own buyout funding (before it is rolled up to the next highest jurisdiction) is not enough to fund a significant buyout program that doesn't exacerbate these problems. Buyout programs need to be concentrated in areas that have repetitive flood losses that can only be addressed through an organized acquisition program that offers households sufficient money to move to an equivalent home in a safer area. Finally, when funding is 'rolled up' to the county level, there should be a requirement to serve areas that didn't have a large enough damage total to have their own funding allocation. It makes sense for jurisdictions NOT to receive small amounts of funding that are insufficient to engage in meaningful recovery or mitigation activities, but these areas shouldn't be left without funding. Otherwise, smaller jurisdictions with fewer housing units may end up not getting access to the funds necessary for recovery.</p>
20	7/6/2018	Online Comment Form	June Tyler, City of Baytown (Chambers County)	<ul style="list-style-type: none"> * Formula * Outside Purview * General * GLO Question 	<p>In the MOD, the City of Baytown was allocated funding for buyouts/acquisition. If the City chooses not to expend this full allocation on buyouts/acquisition, we would like to expend the difference on eligible infrastructure projects. Will H-GAC administer a Housing program region-wide, including within the Baytown City limits? Or will the City of Baytown have to apply for funding and self-administer a housing program for homes damaged within the City limits? The City would like H-GAC to complete eligible housing projects within the City limits. Since Baytown is already included in the MOD, does this disqualify Baytown from any competitive application process made available by H-GAC? Does H-GAC plan to administer all programs (housing and infrastructure) for the entire region including each jurisdiction receiving an allocation? Or, will H-GAC allow jurisdictions to "self-administer" if they are able to show capacity and a proven track record on similar programs with similar allocations? The City of Baytown is interested in administering its own buyout and infrastructure programs. Given that the approval of the MOD and resulting distribution of funds could take months to complete, the City of Baytown would like to immediately procure the administration of infrastructure and buyout services.</p>