

Date received	Method Received	From	Role	Question/Comment	
2/4/2022	Email	Danielle Goshen	National Wildlife Federation	Please see public comment below	
2/4/2022	Email	Kevin Thompson	City of El Campo, Public Works Director	<p>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.</p>	
2/4/2022	Email	Gwyneth Teves	City of Wharton, Director of Planning & Development	<p>(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 HGAC Water Resource Committee on 1/18/2022. (2) 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) The H-GAC MOD should not include Harris County or incorporated jurisdictions within Harris County. 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.</p>	
2/3/2022	verbal - public hearing	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.	

2/3/2022	verbal - public hearing	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 the and 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>	
2/3/2022	verbal - public hearing	Elaine Morales		I Echo Maddie's comment. Many of us in the community learned about this meeting today.	
2/3/2022	verbal - public hearing	Christina Flores	City of Kendleton	YES! We learned about this meeting today as well.	
2/5/2022	verbal - public hearing	Patricia Dorsey		Ruffino could also remove about 2000 structures out of the flood plain! My comment is based on the HCFCF study along Keegans Bayou.	
1/31/2022	Email	Mayor Chris Armacost	Mayor City of Hitchcock mayor@cityofhitchcock.org 409-519-9646	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.	
1/31/2022	email	David Douglas	Flood Plain Manager Liberty County david.douglas@co.liberty.tx.us	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.	

2/3/2022	email	Keith Downey (718) 869-3473	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.	
2/3/2022	email	Kevin D. Thompson, CFM, CWP	Director of Public Works City of El Campo kthompson@cityofelca	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.	
2/3/2022	email	Jo Walton	Resident of Huntington Village Director of Huntington Village HOA johouston@aol.com	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 Hurrican 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. 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.	
2/3/2022	email	Robert A. Crutchfield	Former Chairman Republican Party Sixth State Senate District of Texas crutchfieldcooks@gma	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.	

2/3/2022	email	Kimbra Hill	Interim City Manager City of Sealy 415 Main Street P.O. Box 517 Sealy, TX 77474 979.398.0814 Mobile khill@ci.sealy.tx.us	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 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.	
2/3/2022	email	Gladys House-El	CDC of Freedmen's Town 1401 Andrews Street Houston, Texas 77019 Cell 832 781 9724 Work 713 742 6995 gladys.house@ymail.com	<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 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 setaside 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>	

2/3/2022	email	Brian Moran	Assistant City Manager	Please see public comment below	
2/3/2022	email	Melissa Peñampena@rosenberg	Program Director of Capital Projects City of Rosenberg, Texas 77471 832-595-3592 (Direct)	Thank your for the summary and information on the upcoming MOD being prepared by H-GAC for GLO on the \$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!	
2/4/2022	email	Courtney Sladek, CGFO, ICMA-CM CSladek@cityofelcampo.org City Manager City of El Campo	City Manager City of El Campo	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.	
2/4/2022	email	Richard Tramm rtramm@ci.montgomery.tx.us	City of Montgomery, City Administrator City of Montgomery	Please see public comment below	
2/3/2022	verbal - public hearing	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.	
2/3/2022	verbal - public hearing	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 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 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.	

2/3/2022	verbal - public hearing	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 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.	
2/3/2022	verbal - public hearing	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.	

2/3/2022	verbal - public hearing	Andrew Isbell		<p>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 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 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>	
2/3/2022	verbal - public hearing	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 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.</p>	
2/3/2022	verbal - public hearing	Brian Moran	City of Baytown	<p>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.</p>	

2/3/2022	verbal - public hearing	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 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 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.	
2/3/2022	verbal - public hearing	Andrew Isbell		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.	
2/3/2022	verbal - public hearing	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 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.	
2/3/2022	verbal - public hearing	Andrew Isbell		If I had a question related to one of the comments and made is it would it be appropriate to ask that question, or should I hold that and send that to staff.	

2/3/2022	verbal - public hearing	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 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 flooding issues in Independent Heights. and I would like to thank you again for listening.	
2/3/2022	verbal - public hearing	David Wheaton	Texas Housers	Hi my name is David weakness I work for Texas houses 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 clawback money if municipalities or cities, do not meet that threshold when they are given money, and that is the my comment thanks.	
2/3/2022	verbal - public hearing	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 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.	

2/3/2022	verbal - public hearing	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.	
2/3/2022	verbal - public hearing	Kathy Lynch Gunter	Houston Gardens Super Neighborhood 48	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 study done by the Rice Professor Jim Blackburn that was 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.	
2/3/2022	verbal - public hearing	Jackie Mayhorn		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 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 proposal, we will have a plan for Northeast Houston flood mitigation.	

2/3/2022	verbal - public hearing	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.	
2/3/2022	verbal - public hearing	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 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.	
2/3/2022	verbal - public hearing	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.	
2/3/2022	verbal - public hearing	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 wouls substantially reduce the stress for flooding, lower down on Brays Bayou. And even 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.	

2/3/2022	verbal - public hearing	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 is 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 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.	
2/3/2022	verbal - public hearing	Dietrich von Biedenfeld	Mayor Pro Tem & HGAC Delegate, City of West Columbia	I echo Christina Flores' insights.	

2/3/2022	verbal - public hearing	Madison Sloan	Texas Appleseed	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 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 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 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.	
2/4/2022	email	Madison Sloan	Texas Appleseed	Please see public comment below	
2/4/2022	email	Kim L Kitchen	Harris County resident	Im 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 orhood 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?	

2/4/2022	email		Wharton County resident	<p>Yes my name is Catherine Armstrong I'm from A 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 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>	
2/4/2022	Email	Janet W. Corte	City of Katy	Please see public comment below	
2/4/2022	Email	Christina Flores	City of Kendleton	Please see public comment below	
2/4/2022	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	
2/4/2022	Email				
		Kenneth Williams	Vice-President of the Trinity/Houston Gardens Super Neighborhood	<p>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 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>	

2/4/2022	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. 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 meeting, which proposes to provide the City of Pearland with \$11,014,323 in flood mitigation funding. 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.</p>	
2/4/2022	Email			<p>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 Flood Control District has planned around the Keegans Bayou watershed. We thank you for your consideration and attention to this matter.</p>	
2/4/2022	Voicemail		Brays Oaks Management District	<p>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.</p>	
2/4/2022	voicemail	Dr. Reverand Archie Sauls	Navasota, TX	<p>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. Please give me a call at (214)949-0887.</p>	

2/4/2022	Voicemail	Dr. Audrey 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 have houses that have come up for foreclosure. The Navasota lending apartments. We need housing and we need the underserved communities, served with this money that is coming forth. The streets and the highways...we can wait on that. Right now, we need affordable homes. We need housing for the poor and the underserved people in the City of Navasota County of Grimes. Thanks. You can return my call at (713)478-8153. Thank you.	
2/4/2022	Voicemail	Krista Norris	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. You can call me at (979)257-2156 cell or the office at (979)543-1561 ext-1030. Thank you.	

February 4, 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 COG MOD

Via email to: 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 \$488,772,000¹ 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.**

¹ 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.**

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

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?

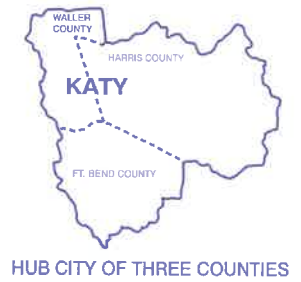
Please don't hesitate to contact us if you have questions or concerns about our comments. We look forward to an extension of the citizen participation process that will fully consider these and other issues and result in a more effective and equitable MOD Process.

Sincerely,

Madison Sloan
Director of Disaster Recovery and Fair Housing
Texas Appleseed
msloan@texasappleseed.org



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

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 1st 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 1st 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?