



# Council of Government (COG) Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation

## Summary Information

### Contact Information

Council of Government (COG): Jeff Taebel

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Principal Contact Name, Title: Director, Community and Environmental Planning

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Principal Contact Telephone: 713-993-4560

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Principal Contact Email: jtaebel@h-gac.com

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Principal Contact Address: 3555 Timmons Lane

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City, State, Zip: Houston, Texas 77027

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### Allocation Summary

COG Allocation for All Programs: \$240,705,199

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Local Buyout and Acquisition Program Total: \$110,953,432

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Local Infrastructure Program Total: \$129,751,767

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## Citizen Participation

Below is a description addressing how the COG complied with their Citizen Participation Plan regarding citizen and non-governmental organization outreach, and any additional efforts exceeding GLO minimum public participation requirements:

H-GAC posted the Method of Distribution planning document on the H-GAC website during the evening of May 30, 2018. H-GAC posted a revised Draft Method of Distribution for public comment on the H-GAC website during the afternoon on June 21.

State guidelines require H-GAC to submit this MOD by July 17, 2018, and to have an extensive public participation and comment process. An overview of H-GAC’s public participation and comment process can be found in the paragraphs that follow. For specific information, see the Citizen Participation Plan (Appendix A).

From June 4, 2018 to June 7, 2018, H-GAC conducted four Public Planning Meetings with local leaders and community members and one Advocacy Group Meeting (input session) with local advocacy groups to inform them of the Method of Distribution process and to seek input on local priorities. H-GAC held two formal Public Hearings on June 28 and 29, 2018, to receive public comment on the proposed method of distribution. Three eblasts were sent to a distribution list of approximately 820 stakeholders prior to the Public Planning Meetings and Public Hearings. Three separate eblasts were distributed to local advocacy groups, inviting them to participate in the Advocacy Group Meeting. For specific information, see the Citizen Participation Plan (Appendix A). Public meetings were advertised in the June and July newsletter for the H-GAC’s Community and Environmental Department, as well as through the agency’s Facebook and Twitter pages.

H-GAC also discussed the Method of Distribution at monthly H-GAC Board of Directors meetings and provided for comment. H-GAC sent a letter to federal and state elected officials representing constituents in the project area, notifying them of the project, upcoming Public Planning Meetings (4 total) and Public Hearings (2 total), and other pertinent project information.

H-GAC posted notices of the Public Planning Meetings and Public Hearings in the *Anahuac Progress*, *Bay City Tribune*, *Brazoria Facts*, *Colorado County Citizen*, *Conroe Courier*, *Fort Bend Herald*, *Forward Times*, *Galveston County News*, *Houston Chronicle*, *Huntsville Item*, *La Informacion*, *Liberty County Vindicator*, *Sealy News*, *Vietnam Moi News*, *Waller Times* and *Wharton Journal Spectator*; on the Secretary of State's Texas Register/Open meetings webpage and the GLO's partner web page; and on the H-GAC website at [www.h-gac.com/harvey](http://www.h-gac.com/harvey). Advocacy groups received a separate invitation to the input session.

H-GAC accepted written comments in person, by mail, and through an online comment form on the H-GAC website during the public comment period June 21, 2018, to July 6, 2018.

### First Public Hearing Information

Date/Time: June 28, 2018/  
5 p.m.-7 p.m. Location: Courtyard by Marriott Houston Katy Mills, 25402 Katy Mills  
Parkway, Katy, Texas

Attendance: 5 Public Planning Meeting:

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

	Method	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	6/21/2018	See Appendix A- Citizen Participation Plan
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

*Internet Notice.* As required, public notice was distributed on the Internet at least **five** (5) days in advance using the following method:

	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	COG Website	6/19/2018	See Appendix A- Citizen Participation Plan

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

	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	Anahuac Progress	5/23/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Bay City Tribune	5/27/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Brazoria Facts	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Colorado County Citizen	5/30/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Conroe Courier	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Fort Bend Herald	5/23/2018	See Appendix A- Citizen Participation Plan

<input checked="" type="checkbox"/>	Forward Times	5/30/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Galveston County News	5/25/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Houston Chronicle	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Huntsville Item	5/23/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	La Informacion	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Sealy News	5/31/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	The Liberty County Vindicator	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Vietnam Moi News	5/25/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Waller Times	5/30/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Wharton Journal Spectator	5/26/2018	See Appendix A- Citizen Participation Plan

Citizen Comment Documentation

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.		
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, meeting discussion is attached.		
<b>Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages (persons with Limited English Proficiency).</b>		Interpreters for Spanish, Vietnamese, and American Sign Language were present at all public hearings. Notices of public hearings were posted in English and in Vietnamese and Spanish language newspapers.	

**Second Public Hearing Information<sup>1</sup>**

Date/Time: June 28, 2018/ 10 a.m. - noon. Location: Homewood Suites by Hilton Conroe, 3000 Interstate 45 North, Conroe, Texas

Attendance: 10 Public Planning  Meeting:

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

	Method	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	6/21/2018	See Appendix A- Citizen Participation Plan
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

*Internet Notice.* As required, public notice was distributed on the Internet at least **five** (5) days in advance using the following method:

<sup>1</sup> If COG held third public hearing, insert information after second public hearing information.

	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	COG Website	6/19/2018	See Appendix A- Citizen Participation Plan

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

	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	Anahuac Progress	5/23/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Bay City Tribune	5/27/2018	See Appendix A- Citizen Participation Plan
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<input checked="" type="checkbox"/>	Colorado County Citizen	5/30/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Conroe Courier	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Fort Bend Herald	5/23/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Forward Times	5/30/2018	See Appendix A- Citizen Participation Plan
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<input checked="" type="checkbox"/>	Houston Chronicle	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Huntsville Item	5/23/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	La Informacion	5/24/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Sealy News	5/31/2018	See Appendix A- Citizen Participation Plan
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<input checked="" type="checkbox"/>	Vietnam Moi News	5/25/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Waller Times	5/30/2018	See Appendix A- Citizen Participation Plan
<input checked="" type="checkbox"/>	Wharton Journal Spectator	5/26/2018	See Appendix A- Citizen Participation Plan

**Citizen Comment Documentation**

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.	
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, and meeting discussion is attached.	
	Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages.	Interpreters for Spanish, Vietnamese, and American Sign Language were present at all public hearings. Notices of public hearings were posted in English and in Vietnamese and Spanish language newspapers.

## **Long-Term Planning and Recovery**

Below is an explanation of how the COG’s method of distribution fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing and the local economy and primarily, how these activities will contribute to the long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

Over the past 10 years, the Houston-Galveston region has been subjected to extensive damage due to direct hits from two major hurricanes (Ike and Harvey) and two significant flood events (Memorial Day and Tax Day). Prior to Harvey, the region received funding that has been used to foster long-term recovery that sought to target permanent restoration of infrastructure, housing, and the local economy through various programs and projects. Our goal is to do the same in the aftermath of Harvey by taking what we have learned from each storm and applying that knowledge to prevent further damage of the same types.

While the GLO is handling the restoration of housing, communities in the Houston-Galveston region will focus on conducting the buyout and acquisition and infrastructure programs that reduce repetitive loss and risk to human health and safety, and improve critical infrastructure that was damaged or failed to function. Both programs will be conducted by eligible communities through various types of eligible activities defined by HUD and the GLO.

The overall goal of rebuilding efforts in the Houston-Galveston region is to establish communities that can withstand or rebound from future disasters.

## **Unmet Housing Needs**

Below is an explanation of how unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

Buyout/acquisition and infrastructure projects are critical to the long-term recovery and restoration of housing in the Houston-Galveston region.

Buyout/acquisition projects will focus on removal of homes and residents from harm's way, thereby preventing repetitive loss and the possibility of catastrophic human loss. Unmet housing needs of those located in these areas will be addressed and resolved through various eligible activities that will be planned and implemented by eligible communities.

Infrastructure projects will focus on repairs or strengthening of infrastructure crucial making communities safe and inhabitable. Unmet housing needs of those located in these areas will be addressed and resolved through various eligible activities that will be planned and implemented by eligible communities.

## **Affirmatively Furthering Fair Housing Statement**

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

## Low-to Moderate Income Requirement

Below is an explanation of how the method of distribution meet the 70 percent low-to moderate income (LMI) requirement for each program. This means that 70 percent of the funds must benefit areas that are 51% or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI).

Per requirements of the State of Texas Plan for Disaster Recovery: Hurricane Harvey June 25, 2018, submitted to the United States Department Housing and Urban Development (HUD) by the Texas General Land Office (GLO), at least 70% of the program funds will benefit low- and moderate-income (LMI) persons. All entities will be required to follow established rules and regulations related to the funding received.

## Local Buyout and Acquisition Program Method of Distribution Detail

The COG is required to prepare a method of distribution for the local buyout and acquisition program funds between the eligible cities, counties, and entities with eminent domain authority. The GLO has directed the COG to use a direct allocation technique based on objective and verifiable data.

### Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
See Appendix B - Summary Worksheets - Allocations and Formulas			

\*Add more rows if needed

All allocations must meet or exceed a floor of \$1,000,000 to help ensure sufficient funds for the Local Buyout and Acquisition program.

### Eligible Activities

Activities must be specifically related to Hurricane Harvey, and must meet the following criteria as outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.2.d).

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.		
<b>-OR-</b>			
<input type="checkbox"/>	The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Buyout	<input type="checkbox"/>	Activities designed to relocate families outside of floodplains
<input type="checkbox"/>	Acquisition	<input type="checkbox"/>	Public service within the 15 percent cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services)
<input type="checkbox"/>	Relocation Assistance with buyout or acquisition activities	<input type="checkbox"/>	FEMA Hazard Mitigation Grant Program (HMGP) cost share
<input type="checkbox"/>	Demolition only		

**Ineligible Activities**

Incentive payments to households that move to disaster-impacted floodplains. Activities located within the city limits of Houston and/or within Harris County are ineligible to participate in the program.

**Local Infrastructure Program Method of Distribution Detail**

The COG is required to prepare a method of distribution for the local infrastructure program funds between the eligible cities and counties. The GLO has directed the COG to use a direct allocation technique based on objective and verifiable data.

**Distribution Factors**

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
See Appendix B - Summary Worksheets - Allocations and Formulas			

\*Add more rows if needed

All allocations must meet or exceed a floor of \$100,000 to help ensure sufficient funds for at least one eligible project.

**Eligible Activities**

Activities must be specifically related to Hurricane Harvey, and must meet the following criteria as outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.7.d).

Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.		
<b>-OR-</b>			
<input type="checkbox"/>	The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Water Facilities	<input type="checkbox"/>	Specially Authorized Public Facilities & Improvements
<input type="checkbox"/>	Sewer Facilities	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Other Public Utilities (gas, et al)	<input type="checkbox"/>	Clearance & Demolition Activities
<input type="checkbox"/>	Street Improvements	<input type="checkbox"/>	Code Enforcement
<input type="checkbox"/>	Flood and Drainage Improvements	<input type="checkbox"/>	Senior Centers
<input type="checkbox"/>	Debris Removal	<input type="checkbox"/>	Economic Development
<input type="checkbox"/>	Community Centers & Emergency Shelters (Existing)	<input type="checkbox"/>	Parks, Playgrounds and other Recreational Facilities

<input type="checkbox"/> Fire Protection Facilities and Equipment	<input type="checkbox"/> Other CDBG-DR eligible activities related to infrastructure
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**Ineligible Activities**

Ineligible activities for the local infrastructure program are outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.7.e) and should be referenced accordingly.

**Approval and Signatory Authority**

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



07/17/2018

Signature

Date

Charles Wemple  
Printed Name

Chief Executive Officer  
Title

charles.wemple@h-gac.com  
Email Address

713-993-4514  
Telephone Number