State of Texas Plan for Disaster Recovery: Amendment 20

Hurricane Harvey – Round 1

Published: April 14, 2026

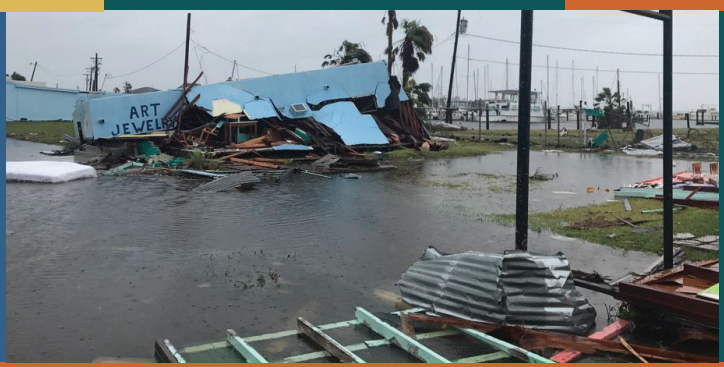
Public Comment Period: Not Applicable

HUD Acknowledged: April 20, 2026

PREPARED BY

THE TEXAS GENERAL LAND OFFICE

COMMUNITY DEVELOPMENT & REVITALIZATION PROGRAM



The Supplemental Appropriations for Disaster Relief Requirements Act, 2017 (Pub. L. 115-56, approved September 8, 2017) 83 FR 5844 (February 9, 2018) and The Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018 (Pub. L. 115-123) 83 FR 40314 (August 14, 2018)

TXGLO

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1.1. Amendment 20: Summary of Changes

This document constitutes the Twentieth Amendment (Nonsubstantial) to the State of Texas Action Plan for Disaster Recovery: Hurricane Harvey – Round 1, approved by HUD on June 22, 2018.

- 2.1 Executive Summary- State Action Plan
    - Table 2: Summary of Remaining Unmet Need
        - Updated to reflect changes in Table 5: Total Allocation Budget
- 2.2 Executive Summary – Harris County Local Action Plan
    - Table 3: Summary of Total Unmet Need in Harris County
        - Updated to reflect changes in Table 5: Total Allocation Budget
- 2.4 Executive Summary – Total Allocation Budget
    - Table 5: Total Allocation Budget
        - Updated to reflect budgetary changes
- 5.1 State Administered Disaster Recovery Program
    - Table 53: Summary of Total Unmet Need
        - Updated to reflect changes in Table 5: Total Allocation Budget
    - Table 54: Total Allocation Budget
        - Updated to reflect budgetary changes
    - Table 55: Total LMI Budget
        - Updated to reflect changes in Table 5: Total Allocation Budget
- 5.2 Harris County Administered Disaster Recovery Program
    - Table 56: Harris County Summary of Total Unmet Need
        - Updated to reflect changes in Table 5: Total Allocation Budget
    - Table 57: Total Allocation Budget – Harris County
        - Updated to reflect changes in Table 5: Total Allocation Budget
    - Harris County Residential Buyout Program
        - End date updated to August 2026
    - Harris County Single Family New Construction Program
        - End date for Model 3 projects updated to August 31, 2026
    - Local Infrastructure Program Activity 3: Harris County Competitive Request for Proposal Program
        - Language added allowing for individual project extensions.
    - Administrative Funds
        - Proposed end date updated to August 2026.

Table 1: Hurricane Harvey CDBG-DR Allocations – Updated in APA 20

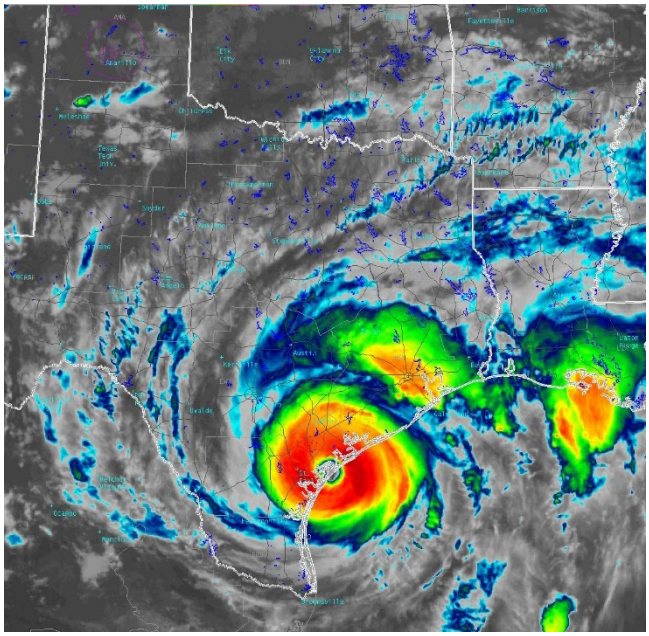
Program	Previous Allocation	Change	Revised Allocation
State of Texas – Total	$4,137,420,563.63	$-	$4,137,420,563.63
State of Texas – Homeowner Assistance	$1,334,222,225.00	$-	$1,334,222,225.00
State of Texas – Harris County Homeowner Assistance	$108,214,125.00	$-	$108,214,125.00
State of Texas - City of Houston Homeowner Assistance	$494,221,438.63	$-	$494,221,438.63
State of Texas – Local Buyout/Acquisition	$99,750,750.99	$-	$99,750,750.99
State of Texas – Homeowner Reimbursement	$102,951,722.12	$-	$102,951,722.12
State of Texas – Affordable Rental	$586,629,497.40	$-	$586,629,497.40
State of Texas – PREPS	$22,587,890.70	$-	$22,587,890.70
State of Texas – Housing Project Delivery	$38,112,791.90	$-	$38,112,791.90
State of Texas – Local Infrastructure	$406,304,099.21	$-	$406,304,099.21
State of Texas – Harris County Flood Control District	$322,033,863.00	$-	$322,033,863.00
State of Texas – Economic Revitalization	$110,000,000.00	$-	$110,000,000.00
State of Texas – Infrastructure Project Delivery	$36,372,920.68	$-	$36,372,920.68
Disaster Recovery Reallocation Program (DRRP)	$91,500,000.00	$-	$91,500,000.00
State of Texas – Planning	$137,685,446.00	$-	$137,685,446.00
State of Texas – Administration	$246,833,793.00	$-	$246,833,793.00

Program	Previous Allocation	Change	Revised Allocation
Harris County – Total	$887,334,984.00	$-	$887,334,984.00
Harris County – Homeowner Assistance	$48,225,717.00	$-	$48,225,717.00
Harris County – Residential Buyout	$222,075,237.00	$(3,961,723.00)	$218,113,514.00
Harris County – Reimbursement	$46,123,171.00	$-	$46,123,171.00
Harris County – Affordable Rental	$235,971,727.00	$-	$235,971,727.00
Harris County – SF New Construction	$60,081,117.00	$6,022,113.00	$66,103,230.00
Harris County – Commercial Buyout	$19,605,124.00	$(1,774,191.00)	$17,830,933.00
Harris County – Method of Distribution (Local)	$128,405,786.00	$-	$128,405,786.00
Harris County – Competitive Application	$70,225,927.00	$-	$70,225,927.00
Harris County – Public Services	$1,290,966.00	$41,279.00	$1,332,245.00
Harris County – Planning	$33,344,506.00	$(327,478.00)	$33,017,028.00
Harris County – Administration	$21,985,706.00	$-	$21,985,706.00
City of Houston – Total	$651,634,452.37	$-	$651,634,452.37
City of Houston – Homeowner Assistance (HoAP)	$68,060,675.08	$-	$68,060,675.08
City of Houston – Single Family Development	$3,589,439.37	$-	$3,589,439.37
City of Houston – Multifamily Rental	$370,855,752.00	$-	$370,855,752.00
City of Houston – Small Rental	$11,355,268.88	$-	$11,355,268.88
City of Houston – Homebuyer Assistance	$36,046,498.95	$-	$36,046,498.95

Program	Previous Allocation	Change	Revised Allocation
City of Houston – Buyout	$87,261,070.67	$-	$87,261,070.67
City of Houston – Public Services	$17,175,483.19	$-	$17,175,483.19
City of Houston – Economic Revitalization	$20,509,342.82	$-	$20,509,342.82
City of Houston – Planning	$21,780,921.41	$-	$21,780,921.41
City of Houston – Administration	$15,000,000.00	$-	$15,000,000.00
Total Allocation	$5,676,390,000.00	$-	$5,676,390,000.00

2.1. Executive Summary – State Action Plan

The hurricane season of 2017 proved to be the most expensive in United States history, impacting families from Puerto Rico to Florida and across the Texas coast. Hurricane Harvey made landfall on August 25, 2017, between Port Aransas and Port O'Connor as a Category 4 hurricane with sustained winds over 130 mph. After initial impact, Hurricane Harvey's winds began to decrease, but due to two high-pressure systems to the east and west, it remained fixed over the Texas coast for the next 4 days. During this period, as much as 60 inches of rain fell over the impacted area.



Source: Weather.gov - Hurricane Harvey Satellite and Radar Landfall Image

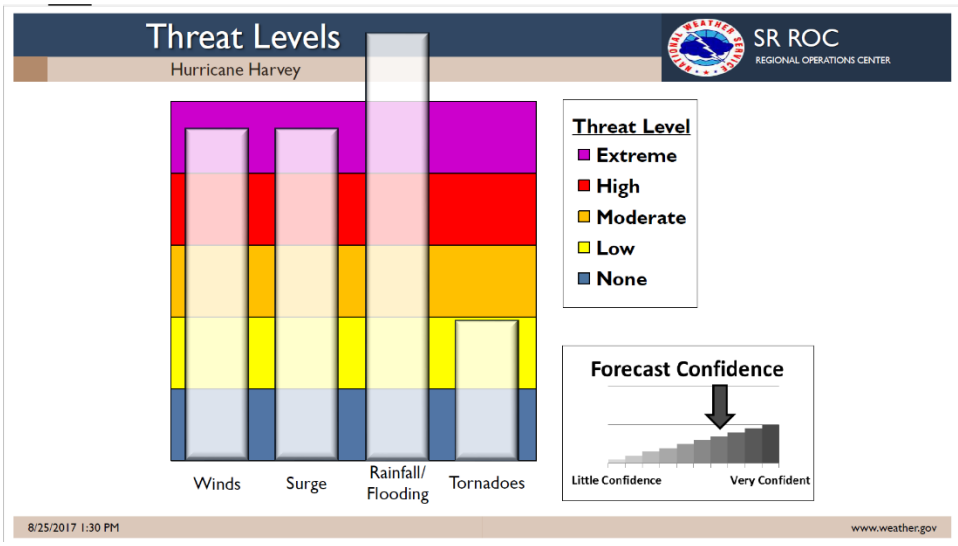
The GLO estimates the cost of damages from Hurricane Harvey at $120 billion, making it the costliest event in U.S. history. The hurricane shut down ports, trade, tourism, oil and gas production, agricultural production, and general businesses across most of the Texas coast for almost a week and, in some cases, significantly longer. The impact of these interruptions is difficult to quantify at this time, but the effects of this disaster were felt across the nation, with commodities such as gas increasing in price by $0.33 a gallon in the weeks following Hurricane Harvey. [1]

Hurricane Harvey resulted in record rainfall totals of 34 trillion gallons of water. [2] Combining this record rainfall together with the fact that Hurricane Harvey made landfall twice creates a three-event narrative: the initial landfall in Aransas County; the unprecedented rainfall in the Houston metroplex and surrounding areas; and Hurricane Harvey's second landfall which caused massive flooding in Southeast Texas. Following these three events, tens of thousands of homes that had never been flooded took on water, and evacuations and rescues continued for days after landfall.

[1] U.S. Energy Information Administration. 2018. "Petroleum & Other Liquids." Webpage accessed January 8, 2018. https://www.eia.gov/petroleum/gasdiesel/

[2] San Antonio Express-News. September 17, 2017. "Harvey Dumped Record-Setting 34 Trillion Gallons of Rain." Webpage accessed January 10, 2018. http://www.expressnews.com/news/local/article/Harvey-dumped-record-setting-34-trillion-gallons-12204769.php

The GLO estimates over 1 million homes were impacted by Hurricane Harvey and the state of Texas is projected to spend more than $2.6 billion on response and recovery, of which almost $1.7 billion is reported to be funded by the federal government.[3] As of June 8, 2018, the Federal Emergency Management Agency (FEMA) Public Assistance (PA) program estimates damage costs at approximately $7.96 billion. As of June 25, 2018, the FEMA Individuals and Households program (Total Housing Assistance and Total Other Needs Assistance) received over 892,000 applications and has disbursed about $3.61 billion in housing assistance and other related emergency disaster assistance. As of July 31, 2018, FEMA's National Flood Insurance Program (NFIP) received over 91,000 claims and disbursed more than $8.8 billion to claimants. The Small Business Administration (SBA) has disbursed over $2.9 billion in home loans and almost $1.4 billion in business loans as of August 28, 2018.



Source: www.weather.gov

On December 27, 2017, HUD in response to Hurricane Harvey allocated $57.8 million in Community Development Block Grant – Disaster Recovery (CDBG-DR) funds to the state of Texas through the publication of the Federal Register, Vol. 82, No. 247. HUD identified Harris County as the "most impacted and distressed" area in the Federal Register notice and required that at least 80 percent of the allocation must address unmet needs within the County. The GLO allocated the remaining portion of the initial funds to Aransas, Nueces, and Refugio Counties for an affordable rental program. The GLO developed an Action Plan for the $57.8 million allocation, and submitted the Action Plan for approval to HUD on March 8, 2018.

HUD has allocated $5.024 billion in CDBG-DR funds to the state of Texas in response to Hurricane Harvey, DR-4332, through the publication of the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018. This allocation was made available through the Continuing Appropriations Act, 2018, and Supplemental Appropriations for Disaster Relief Act, 2017, that allocated $7.4 billion in CDBG-DR funds in response to major disasters declared in 2017. HUD's notice in the Federal Register, Vol. 83, No. 157, August 14, 2018, allocated an additional $652,175,000 to the state of Texas to address remaining unmet needs from Hurricane Harvey. The GLO has been designated by the governor to administer CDBG-DR funds on behalf of the state of Texas.

[3] Legislative Budget Board. 2018. "Hurricane Harvey: Fiscal Analyses and Resources." Webpage accessed September 7, 2018. http://www.lbb.state.tx.us/Harvey.aspx

This Action Plan will detail the proposed use of all funds, including criteria for eligibility and how the use of these funds will address long-term recovery and restoration of infrastructure, housing, and economic revitalization in the most impacted and distressed areas. The use of funds for this allocation is limited to unmet recovery needs from Hurricane Harvey, DR-4332.

HUD has identified Aransas, Brazoria, Chambers, Fayette, Fort Bend, Galveston, Hardin, Harris, Jasper, Jefferson, Liberty, Montgomery, Newton, Nueces, Orange, Refugio, San Jacinto, San Patricio, Victoria, and Wharton Counties; 75979, 77320, 77335, 77351, 77414, 77423, 77482, 77493, 77979, and 78934 ZIP Codes as the "most impacted and distressed" areas in the latest Federal Register notice, Vol. 83, No. 157, August 14, 2018, and has required that at least 80 percent of the allocation must address unmet needs within these areas. Up to 20 percent will address unmet needs within the "most impacted and distressed" areas determined by the GLO to be the remaining 29 CDBG-DR eligible counties (in whole or in part) through the unmet needs assessment in Section II of this Action Plan.

For the purpose of this Action Plan, the four counties (Bexar, Dallas, Tarrant, and Travis) that received FEMA disaster declarations for emergency protective measures, including direct federal assistance under the PA program, are not included in the 49 CDBG-DR eligible counties identified on the map below.

There are 24 regional councils, also known as COGs, located within the State. The COGs are comprised of city, county, and special district members working together to implement cost-effective, results-oriented strategies that address statewide and local needs on a regional scale. The 49 CDBG-DR eligible counties are located within nine COGs: Alamo Area Council of Governments (AACOG); Brazos Valley Council of Governments (BVCOG): Capital Area Council of Governments (CAPCOG); Coastal Bend Council of Governments (CBCOG); Central Texas Council of Governments (CTCOG); Deep East Texas Council of Governments (DETCOG); Golden Crescent Regional Planning Commission (GCRPC); Houston-Galveston Area Council (H-GAC); and South East Texas Regional Planning Commission (SETRPC). Each COG and the CDBG-DR eligible county are identified on the map below.

Since 2005's Hurricane Rita, COGs have been active partners with the State's CDBG-DR programs. The COGs have developed local MODs to local governments and entities for CDBG-DR housing and infrastructure funds, and have implemented successful homeowner and rental housing recovery programs. In addition to their work with the State's CDBG-DR programs, the COGs also work in programs and areas related to community and economic development, emergency preparedness, emergency communications, and health and human services.

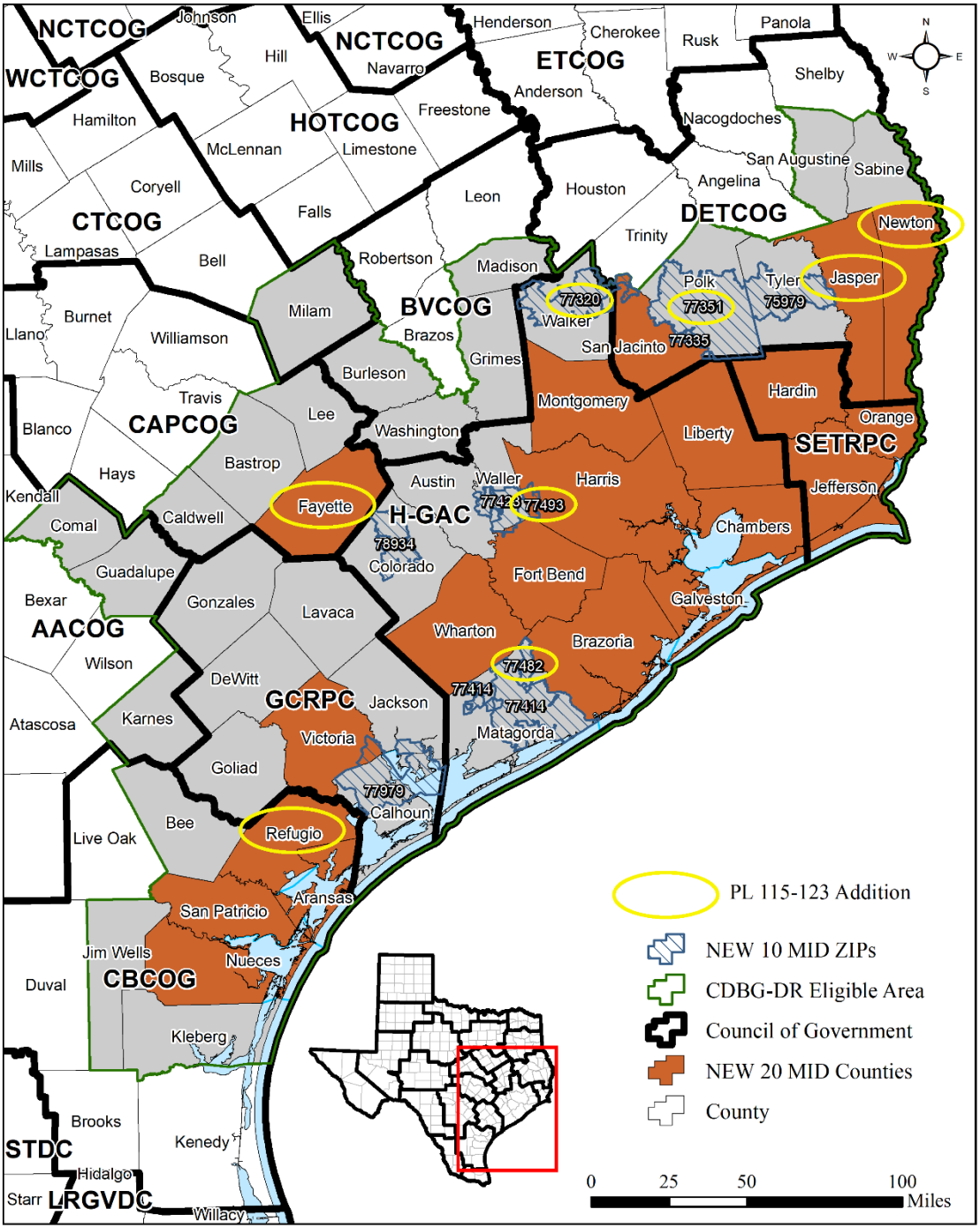


Figure 1: DR-4332 49 CDBG-DR Eligible Counties and HUD's Most Impacted Counties and ZIP Codes (P.L. 115-123) (Updated in APA 2)

A summary of the State of Texas unmet need is identified in the table below. As required, a needs assessment was completed to identify long-term needs and priorities for CDBG-DR funding allocated as a result of Hurricane Harvey. The assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors. The needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed

communities, and includes details for housing, infrastructure, and economic revitalization. The needs assessment is expected to be amended as additional information and funds are available or updated.

The unmet needs assessment for the Action Plan Amendment 12 (APA12) continued with an evaluation of the three core aspects of recovery – housing, infrastructure, and economic development. This continued assessment forms the basis for the decision outlined in APA12. This assessment was developed with the help of regional and local stakeholders, as well as those in the field providing housing and other assistance for the GLO, to determine how unmet needs can be addressed with these limited federal funds. The assessment identified the below percentages of unmet need split out by the three categories of housing, infrastructure, and economic development.

Table 2: Summary of Remaining Unmet Need (Updated in APA 20)

Category	Remaining Unmet Need	% of Unmet Need	Total Program Allocation Amount	% of Total Program Allocation
Housing	$ 12,013,620,304	14.09%	$ 3,978,396,505.69	75.18%
Infrastructure	$ 60,753,701,621	71.24%	$ 1,182,673,528.89	22.35%
Economic Development	$ 12,515,963,477	14.68%	$ 130,509,342.82	2.47%
Total	**$ 85,283,285,402**	**100%**	**$ 5,291,579,377**	**100%**

***Allocation Amount includes project delivery costs and does not include administration and planning costs.**

As identified, the CDBG-DR funds cannot meet all the unmet needs that have been identified and reevaluated through the long-term recovery period. While the reallocation of funds in APA12 reflect a slight shift in priority (an increase in infrastructure funds and a slight decrease in housing funds) from the allocation in the Action Plan Amendment 11, no new unmet needs have been identified. Current program allocations for housing are far above those identified unmet needs while the program allocation for infrastructure remains far below the identified remaining unmet needs for infrastructure as outlined in the State's Needs Assessment.

While APA12 showed that the percentage of funds for housing is being reduced from 80 percent to 79 percent, this particular shift in APA12 does not take into account the use of funds from other programs that are addressing the unmet and mitigation needs being addressed by additional appropriations. The funds from the Consolidated Appropriations Act, 2017 (Public Law 115-31) resulted in the allocation of $57,800,000 for communities impacted by Hurricane Harvey. These funds have been spent primarily in the Harris County region for housing and affordable rental projects. Additionally, funds from the Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018 (Public Law 115-123) and Additional Supplemental Appropriations for Disaster Relief Act, 2019 (Public Law 116-20) resulted in an allocation to the state of Texas in the amount of $4,301,841,000 for CDBG Mitigation (CDBG-MIT) programs. These CDBG-MIT programs also have a strong focus on housing recovery and mitigation tied to Hurricane Harvey, as evident with the Housing Oversubscription Supplemental Program and the Resilient Home Program. Further, the funds being allocated to infrastructure projects in the Harris

County region are related to the unmet housing needs in that infrastructure flood control projects will mitigate and remediate the flooding impacts experienced by homeowners in the region.

The City of Houston and Harris County areas each received a direct allocation from the State's allocation at the direction of HUD. The amounts allocated to the areas of the City of Houston and Harris County for the initial $5.024 billion were based on the amounts of unmet need calculated by HUD. The same methodology was used by HUD to determine the amount of the $5.024 billion allocated to the State of Texas. The amounts were adjusted to account for the prior allocation to Harris County, the economic revitalization program, and state administration costs. Located in Appendix G (Section 13.1) is a table that identifies the adjustments made in the Initial Action Plan. Subsequent adjustments have been made through Amendment 8 to the amount allocated to Harris County reflecting the increase in total allocation and separation of the residential and commercial buyout programs, and the reimplementation of the City of Houston Programs. These adjustments are reflected in Appendix G (Section 13.1). Harris County, the City of Houston or the GLO will manage these direct allocations. The State reserves the right to administer programs directly based on the performance and need in any subrecipient area.

APA 2 allocated an additional $652,175,000 in program funds provided by Public Law 115-123. The GLO allocated the funds to the areas of Harris County, the City of Houston, and the State of Texas by applying the same methodology used to allocate funds for the State HAP, as described in Section 12.1 Appendix F: Regional Methods of Distribution, but with Harris County and the city of Houston included.

Within HUD's Disaster Recovery Grant Reporting (DRGR) system Action Plan, the GLO will determine which programs and costs are drawndown from each respective allocation/grant irrespective of which programs received additional funding as part of APA2.

Because the city of Houston and Harris County initially elected to develop their own local recovery programs, with the exception of the State's economic revitalization program, each was required to develop a local action plan. The local action plans were developed in accordance with the requirements HUD outlined in the Federal Register notice. These local action plans were incorporated into this Action Plan as part of Amendment 1. The executive summaries for Harris County and the City of Houston are provided in Sections 2.2 and 2.3; the Needs Assessments are provided in Sections 3.2 and 3.3; and the respective Disaster Recovery Program information is in Sections 5.2 and 5.3. Amendment 7 defunded all programs contained within the City of Houston local action plan and moved those funds to state-run programs to be conducted within the city of Houston by the GLO. Amendment 8 reimplemented the City of Houston local action plan, and reallocated a portion of the funds from the state-run City of Houston HAP program and eliminated the state-run City of Houston Rental Program and Economic Revitalization. Amendment 9 adjusts the Harris County Homeowner Reimbursement, Affordable Rental and Single Family New Construction Programs, as well as the City of Houston Single Family Development, Buyout and Economic Revitalization Programs. Amendment 11 will reallocate $140,930,253 from the City of Houston administered disaster recovery programs to the State administered City of Houston Homeowner Assistance Program. The funds are being reallocated from the City of Houston administered disaster recovery programs that failed to meet program contract benchmarks. The reallocated funds will be used in the oversubscribed State administered City of Houston

Homeowner Assistance Program to rehabilitate and reconstruct homes damaged by Hurricane Harvey within the City of Houston. The State administered City of Houston Homeowner Assistance Program amended budget is $565,601,475. Amendment 11 maintains the $1.2 billion in CDBG-DR funds to address unmet recovery needs within the City of Houston.

Amendment 12 reallocates $30 million from the City of Houston administered disaster recovery program, $30 million from Harris County administered disaster recovery program, $83.9 million from State administered City of Houston Homeowner Assistance Program (HAP), and $178.13 million from the State administered Harris County HAP to the Harris County Flood Control District (HCFCD). The funds are being reallocated from the City of Houston and Harris County administered disaster recovery programs that failed to meet program contract benchmarks. The GLO has and will serve all eligible applicants within the State-Administered Harris County HAP and the State-Administered City of Houston HAP.

Amendment 16 includes the creation of the Disaster Recovery Reallocation Program (DRRP) in order to utilize deobligated and unutilized amounts to provide the opportunity for communities with outstanding unmet needs to access remaining CDBG-DR funds. The amendment also contains budget and timeline updates to Harris County and City of Houston Programs.

The HCFCD program will provide disaster relief, long-term recovery, and flood and drainage improvement for local communities within Harris County impacted by Hurricane Harvey as well as protecting assets that have since been repaired from Hurricane Harvey. Each project must demonstrate how it will contribute to the long-term recovery and restoration of housing. Amendment 12 maintains the $2.46 billion in CDBG-DR funds to address unmet recovery needs within Harris County and the City of Houston.

Through this Action Plan, the GLO is proposing to implement several state-run housing programs. These programs include the homeowner assistance program for rehabilitation and reconstruction of primary residences, the homeowner reimbursement program for reimbursement to homeowners for repairs on their primary residences, and the affordable rental program to rehabilitate and reconstruct multifamily developments.

The GLO will allocate funds to local governments for the local residential buyout/acquisition and local infrastructure programs through MODs developed by the COGs.

2.2. Executive Summary – Harris County Local Action Plan

HUD has allocated $5.024 billion in CDBG-DR funding to the State of Texas in response to Hurricane Harvey, FEMA DR 4332, through the Federal Register, Vol. 83, No. 28 (83 FR 5844). On August 14, 2018, a Federal Register, Vol. 83, No. 157 (83 FR 40314), was released allocating additional CDBG-DR funding of $652,175,000 to the State of Texas. The Texas GLO is the State's administrating agency for these funds.

In the *State of Texas Plan for Disaster Recovery: Hurricane Harvey – Round 1* CDBG-DR Action Plan, which can be found at https://recovery.texas.gov/action-plans/index.html on the GLO website, Harris County was identified as a "most impacted and distressed" area and was allocated by the State, along with the City of Houston, a direct allocation from the State's CDBG-DR allocation at the direction of HUD of $1,234,813,590. As Harris County and the City of Houston elected to develop their own local recovery programs, both jurisdictions were required to develop local supplemental action plans (SAPs) to be submitted as a substantial amendment under the State of Texas Action Plan. This substantial amendment (APA 1) was submitted and approved by HUD in December 2018. Several programs within Harris County's SAP – identified in Section 5.2 – were eliminated and the funds from those programs either transferred to other programs within that SAP or to a new state-run homeowners assistance program through Amendment 7. In Amendment 8, the total Harris County Local Action Plan budget has been increased, and the residential and commercial buyout programs have been separated. Amendment 12 reallocates $30 million from the Harris County administered disaster recovery program to allocate funds to the Harris County Flood Control District (HCFCD). Amendment 12 maintains the $1.2 billion in CDBG-DR funds to address unmet recovery needs within Harris County.

In consultation with the GLO, Harris County has been given technical assistance to develop their local SAP. The County's SAP includes a needs assessment, community engagement efforts, description of unmet needs, and county's use of funds and program descriptions, and expenditure timelines. The following document is Harris County's local SAP.

During Hurricane Harvey, all 4.7 million people in Harris County were impacted directly or indirectly during the flood. The peak total rainfall over a 4-day period from Harris County Flood Control District (HCFCD) gages was 47.4 inches. This record rainfall was deadly and devastating to county residents. Over 60,000 residents were rescued by government resources across the county, most of them from their homes. Over 32,000 residents would be transported to one of 65 temporary shelters in Harris County, where most would wait days until the waters receded to return to damaged homes. It is estimated that over 300,000 vehicles were flooded across Harris County. The Harris County Medical Examiner's Office confirms 36 flood related deaths in the county, including several people drowning in their home or work place.

The resulting devastation of Hurricane Harvey has left the county with an unmet need of over $12.9 billion in housing and infrastructure damage or failure to function. The following table provides a summary of Harris County's unmet needs. The county has elected to closely follow the Federal Register and State Action Plan and provide 74 percent of funding to housing programs and 26 percent to infrastructure/non-housing programs. As a "most impacted and distressed" area, Harris County will expend its allocation within the county, thus meeting the 80 percent rule to

expend funds in a “most impacted and distressed” area. It should be noted that the County will be participating in the State’s Economic Development Program.

Table 3: Summary of Total Unmet Need in Harris County (outside the City of Houston) Updated APA 20

Category	Unmet Needs	% of Unmet Need	County Program Allocation Amount	% of County Allocation
Housing*	$2,864,912,259	22.19%	$ 614,537,359	73.95%
Infrastructure	$9,960,039,307	77.15%	$ 216,462,646	26.05%
Economic Development	$84,846,950	0.66%	**	**
TOTAL	$12,909,798,516	100%	$ 831,000,005	100%

Note: Allocations do not include planning and administrative costs. * The County is participating in the State's Harris County Homeowner Assistance Program. **The County is participating in the State's Economic Development Program.

There are additional gaps and unmet needs not reflected in the assessment. The County will continue to gather and refine information, such as data and public input, which will continue to inform the CDBG-DR process and program design.

2.3. Executive Summary – City of Houston Local Action Plan

In response to Hurricane Harvey and the presidentially declared disaster, Congress appropriated more than $5 billion to the State of Texas for recovery assistance. The Texas GLO is applying for and administering these funds on behalf of the state. The GLO made a direct allocation to the City of Houston and Harris County at the direction of HUD, and therefore both the City of Houston and Harris County developed a local action plan in Amendment 1. Amendment 7 to this Action Plan has substantially altered these local action plans by eliminating the programs and moving those funds to GLO-administered programs. Programs within the City of Houston SAP have been defunded and moved to a state-run homeowner assistance program, rental program, and economic revitalization program targeted within the city of Houston. Through Amendment 8 to the Action Plan, all programs administered by the City of Houston prior to APA7 will be reimplemented by the City.

Amendment 11 will reallocate $140,930,253 from the City of Houston administered disaster recovery programs to the State administered City of Houston Homeowner Assistance Program. The funds are being reallocated from the City of Houston administered disaster recovery programs that failed to meet program contract benchmarks. The reallocated funds will be used in the oversubscribed State administered City of Houston Homeowner Assistance Program to rehabilitate and reconstruct homes damaged by Hurricane Harvey within the City of Houston. The State administered City of Houston Homeowner Assistance Program amended budget is $565,601,475.

The City of Houston followed the GLO's guidance and created Houston specific information to be incorporated into various sections of the GLO's *State of Texas Plan for Disaster Recovery: Hurricane Harvey – Round 1* through a substantial amendment. The local information in the City's action plan includes local needs assessment, connection to unmet needs, local programs and requirements, local consultation, and expenditure timelines. Through Amendment 8 to the Action Plan, all programs administered by the City of Houston prior to APA7 will be reimplemented by the City. Amendment 12 reallocates $30 million from the City of Houston administered disaster recovery program to allocate funds to the Harris County Flood Control District (HCFCD). Amendment 12 maintains the $1.2 billion in CDBG-DR funds to address unmet recovery needs within the City of Houston.

A summary of the unmet needs assessment is identified in the following table. This needs assessment aligns with the GLO's assessment, as feasible.

Table 4: Summary of Total Unmet Need – City of Houston (updated APA 18)

Category	Unmet Need	% of Unmet Need	CDBG-DR Investments*	% of Houston Program Allocation
Housing	$1,762,206,538	59.30%	1,071,390,143.58	98.22%
Infrastructure	$109,829,427	3.70%	$-	0.00%
Economic	$1,099,849,484	37.01%	$20,509,342.82	1.88%
Total	**$2,971,885,449**	**100%**	**$1,091,899,486.40**	**100.00%**

* CDBG-DR Housing Investments includes the State administered City of Houston Homeowner Assistance Program amount.

2.4. Executive Summary – Total Allocation Budget

The following table shows the combined total allocation budget for the State-administered programs and the programs administered by Harris County and the City of Houston.

Table 5: Total Allocation Budget (Updated in APA 20)

Programs		HUD Most Impacted Areas	State Most Impacted Areas	LMI Amount	Total	% of Total Allocation by Program	% of Total Allocation	Total
Direct Allocation Programs								
Direct Programs - Harris County								
Harris County - Housing	Homeowner Assistance Program	$ 48,225,717.00	$ -	$ 37,000,000.00	**$ 48,225,717.00**	**0.85%**	**10.83%**	**$ 614,537,359.00**
	Residential Buyout Program	$ 218,113,514.00	$ -	$ 158,206,036.00	**$ 218,113,514.00**	**3.84%**		
	Reimbursement Program	$ 46,123,171.00	$ -	$ 23,000,000.00	**$ 46,123,171.00**	**0.81%**		
	Affordable Rental Program	$ 235,971,727.00	$ -	$ 235,971,727.00	**$ 235,971,727.00**	**4.16%**		
	SF New Construction	$ 66,103,230.00	$ -	$ 60,081,117.00	**$ 66,103,230.00**	**1.16%**		
Harris County - Infrastructure	Commercial Buyout Program	$ 17,830,933.00	$ -	$ 17,830,933.00	**$ 17,830,933.00**	**0.31%**	**3.81%**	**$ 216,462,646.00**
	Method of Distribution (Local)	$ 128,405,786.00	$ -	$ 89,884,050.00	**$ 128,405,786.00**	**2.26%**		
	Competitive Application	$ 70,225,927.00	$ -	$ 49,158,148.00	**$ 70,225,927.00**	**1.24%**		
Harris County Public Services	Public Services	$ 1,332,245.00	$ -	$ 1,290,966.00	**$ 1,332,245.00**	**0.02%**	**0.02%**	**$ 1,332,245.00**
Harris County - Planning and Administration	Harris County Planning	$ 33,017,028.00	$ -	N/A	**$ 33,017,028.00**	**0.58%**	**0.97%**	**$ 55,002,734.00**
	Harris County Administration	$ 21,985,706.00	$ -	N/A	**$ 21,985,706.00**	**0.39%**		
	Harris County Subtotal	**$ 887,334,984.00**	**$ -**	**$ 672,422,977.00**	**$ 887,334,984.00**	**15.63%**		
Direct Programs - City of Houston								
City of Houston - Housing	Homeowner Assistance Program	$ 68,060,675.08	$ -	$ 63,769,505.82	**$ 68,060,675.08**	**1.20%**	**10.17%**	**$ 577,168,704.95**
	Single Family Development Program	$ 3,589,439.37	$ -	$ 3,589,439.37	**$ 3,589,439.37**	**0.06%**		
	Multifamily Rental Program	$ 370,855,752.00	$ -	$ 370,855,752.00	**$ 370,855,752.00**	**6.53%**		
	Small Rental Program	$ 11,355,268.88	$ -	$ 11,355,268.88	**$ 11,355,268.88**	**0.20%**		
	Homebuyer Assistance Program	$ 36,046,498.95	$ -	$ 23,452,314.16	**$ 36,046,498.95**	**0.64%**		
	Buyout Program	$ 87,261,070.67	$ -	$ 87,261,070.67	**$ 87,261,070.67**	**1.54%**		
City of Houston -Public Services and Economic Revitalization	Public Services	$ 17,175,483.19	$ -	$ 17,175,483.19	**$ 17,175,483.19**	**0.30%**	**0.66%**	**$ 37,684,826.01**
	Economic Revitalization Program	$ 20,509,342.82	$ -	$ 20,509,342.82	**$ 20,509,342.82**	**0.36%**		
City of Houston - Planning and Administration	City of Houston Planning	$ 21,780,921.41	$ -	N/A	**$ 21,780,921.41**	**0.38%**	**0.65%**	**$ 36,780,921.41**
	City of Houston Administration	$ 15,000,000.00	$ -	N/A	**$ 15,000,000.00**	**0.26%**		
	City of Houston Subtotal	**$ 651,634,452.37**		**$ 597,968,176.91**	**$ 651,634,452.37**	**11.48%**		
	Direct Allocation Subtotal	**$ 1,538,969,436.37**	**$ -**	**$ 1,270,391,153.91**	**$ 1,538,969,436.37**			
GLO State Programs								
State Housing	**Homeowner Assistance Program**	**$ 1,237,671,730.00**	**$ 96,550,495**	**$ 933,955,558**	**$ 1,334,222,225.00**	**23.50%**	**49.09%**	**$ 2,786,690,441.74**
	AACOG	$ -	$ 2,991,343.00	$ 2,096,040.00	$ 2,991,343.00	*0.22%*		
	BVCOG	$ -	$ 2,058,611.00	$ 1,441,028.00	$ 2,058,611.00	*0.15%*		
	CAPCOG	$ 4,835,864.00	$ 2,275,701.00	$ 4,978,096.00	$ 7,111,565.00	*0.53%*		
	CBCOG	$ 246,868,431.00	$ 15,757,560.00	$ 183,838,194.00	$ 262,625,991.00	*19.68%*		
	CTCOG	$ -	$ -	$ -	$ -	*0.00%*		
	DETCOG	$ 147,589,819.00	$ 12,607,531.00	$ 112,138,145.00	$ 160,197,350.00	*12.01%*		
	GCRPC	$ 54,895,151.00	$ 13,723,788.00	$ 48,033,257.00	$ 68,618,939.00	*5.14%*		
	H-GAC	$ 557,911,468.00	$ 47,132,961.00	$ 423,531,100.00	$ 605,044,429.00	*45.35%*		
	SETRPC	$ 225,570,997.00	$ -	$ 157,899,698.00	$ 225,570,997.00	*16.91%*		
	Harris County Homeowner Assistance Program	**$ 108,214,125.00**	**$ -**	**$ 75,749,887.50**	**$ 108,214,125.00**	**1.91%**		
	City of Houston Homeowner Assistance Program	**$ 494,221,438.63**	**$ -**	**$ 345,955,007.04**	**$ 494,221,438.63**	**8.71%**		
	Local Buyout/Acquisition Program	**$ 91,328,510.74**	**$ 8,422,240.25**	**$ 69,825,525.69**	**$ 99,750,750.99**	**1.76%**		
	AACOG	$ -	$ 31,060.91	$ 21,742.64	$ 31,060.91	*0.03%*		
	BVCOG	$ -	$ 1,512,129.00	$ 1,058,490.30	$ 1,512,129.00	*1.52%*		
	CAPCOG	$ 3,385,827.20	$ 917,616.65	$ 3,012,410.70	$ 4,303,443.85	*4.31%*		
	CBCOG	$ 706,501.75	$ -	$ 494,551.23	$ 706,501.75	*0.71%*		
	CTCOG	$ -	$ 31,390.56	$ 21,973.39	$ 31,390.56	*0.03%*		
	DETCOG	$ 19,162,848.36	$ 3,254,533.19	$ 15,692,167.09	$ 22,417,381.55	*22.47%*		
	GCRPC	$ 1,317,508.44	$ 58,518.85	$ 963,219.10	$ 1,376,027.29	*1.38%*		
	H-GAC	$ 47,583,204.84	$ 2,616,991.09	$ 35,140,137.15	$ 50,200,195.93	*50.33%*		
	SETRPC	$ 19,172,620.15	$ -	$ 13,420,834.11	$ 19,172,620.15	*19.22%*		
	Homeowner Reimbursement Program	**$ 102,125,895.68**	**$ 825,826.44**	**$ 35,911,195.88**	**$ 102,951,722.12**	**1.81%**		
	Affordable Rental Program	**$ 565,654,176.95**	**$ 20,975,320.45**	**$ 586,629,497.40**	**$ 586,629,497.40**	**10.33%**		
	PREPS Program	**$ 22,443,328.20**	**$ 144,562.50**	**$ -**	**$ 22,587,890.70**	**0.40%**		
	State Project Delivery	**$ 30,490,233.52**	**$ 7,622,558.38**	**$ 34,961,747.89**	**$ 38,112,791.90**	**0.67%**		
State Infrastructure and Economic Revitalization	**Local Infrastructure Program**	**$ 362,721,839.80**	**$ 43,582,259.41**	**$ 284,412,869.45**	**$ 406,304,099.21**	**7.16%**	**15.41%**	**$ 874,710,882.89**
	AACOG	$ -	$ 158,775.00	$ 111,142.50	$ 158,775.00	*0.04%*		
	BVCOG	$ -	$ 3,007,821.44	$ 2,105,475.01	$ 3,007,821.44	*0.74%*		
	CAPCOG	$ 929,021.13	$ 3,376,452.87	$ 3,013,831.80	$ 4,305,474.00	*1.06%*		
	CBCOG	$ 125,703,580.06	$ 100,645.00	$ 88,062,957.54	$ 125,804,225.06	*30.96%*		
	CTCOG	$ -	$ 510,000.00	$ 357,000.00	$ 510,000.00	*0.13%*		
	DETCOG	$ 7,303,038.25	$ 160,124.00	$ 5,224,213.58	$ 7,463,162.25	*1.84%*		
	GCRPC	$ 20,033,417.86	$ 15,945,513.35	$ 25,185,251.85	$ 35,978,931.21	*8.86%*		
	H-GAC	$ 103,739,561.87	$ 20,322,927.75	$ 86,843,742.73	$ 124,062,489.62	*30.53%*		
	SETRPC	$ 105,013,220.63	$ -	$ 73,509,254.44	$ 105,013,220.63	*25.85%*		
	Harris County Flood Control District Program	**$ 322,033,863.00**	**$ -**	**$ 161,016,931.50**	**$ 322,033,863.00**	**5.67%**		
	Economic Revitalization Program	**$ 106,643,500.00**	**$ 3,356,500.00**	**$ 110,000,000.00**	**$ 110,000,000.00**	**1.94%**		
	State Project Delivery	**$ 29,098,336.55**	**$ 7,274,584.13**	**$ 25,461,044.48**	**$ 36,372,920.68**	**0.64%**		
Disaster Recovery Reallocation Program (DRRP)		**$ 73,200,000.00**	**$ 18,300,000.00**	**$ 64,050,000.00**	**$ 91,500,000.00**	**1.61%**	**1.61%**	**$ 91,500,000.00**
State Planning and Administration	**State Planning**	**$ 110,148,357.00**	**$ 27,537,089.00**	**N/A**	**$ 137,685,446.00**	**2.43%**	**6.77%**	**$ 384,519,239.00**
	State Administration	**$ 197,467,034.40**	**$ 49,366,758.60**	**N/A**	**$ 246,833,793.00**	**4.35%**		
	State Allocation Subtotal	$ 3,853,462,369.47	$ 283,958,194.16	$ 2,727,929,264.74	$ 4,137,420,563.63			
	Grand Total Allocation	**$ 5,392,431,805.84**	**$ 283,958,194.16**	**$ 3,998,320,418.65**	**$ 5,676,390,000.00**	**100%**	**100%**	**$ 5,676,390,000.00**

3.1. Needs Assessment – State Action Plan

The State of Texas completed the following needs assessment to identify long-term needs and priorities for CDBG-DR funding allocated as a result of Hurricane Harvey. This assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors and was completed according to guidelines set forth by HUD in Federal Register, Vol. 83, No. 28, Friday, February 9, 2018. The information focuses on the statewide impacts and the impacts on the 49 CDBG-DR eligible counties (see list in Appendix A). The information for the assessment was compiled using federal and state sources, including information from FEMA, HUD, Texas Division of Emergency Management (TDEM), SBA, Health and Human Services Commission (HHSC), and other federal and state agencies. The GLO was able to work with these agencies to gather information regarding the impacts of the hurricane, actions taken during and following the storm, and unmet need.

This needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed communities. This includes details for housing, infrastructure, and economic revitalization. This assessment takes into consideration pre-disaster needs in addition to needs resulting from Hurricane Harvey. It discusses additional types of assistance that may be available to affected communities and individuals, such as insurance, other federal assistance, or any other possible funding sources. The unmet needs calculations for owner-occupied and renter-occupied housing impacts is not reduced to account for need met through insurance because insurance data cannot be tied to a specific FEMA IA registrant. Taking the above into consideration, mitigation and resiliency measures to protect against future hazards are also to be examined.

The GLO understands that additional information and clarity will come with time and anticipates that as additional funds are allocated, there may be a different methodology for the distribution of those funds. As further data becomes available, adjustments may be necessary in future allocation MODs to account for data that does not exist as of today's Action Plan. As indicated in prior versions of the Action Plan, the needs assessment is amended as additional information is available or updated. Updates were made in APA 2 to reflect the most recent available or attainable data and information. The local needs assessments conducted by Harris County and the City of Houston are provided in Sections 3.2 and 3.3.

The unmet needs assessment for the Action Plan Amendment 12 (APA12) continued with an evaluation of the three core aspects of recovery – housing, infrastructure, and economic development. This continued assessment forms the basis for the decision outlined in APA12. This assessment was developed with the help of regional and local stakeholders, as well as those in the field providing housing and other assistance for the GLO, to determine how unmet needs can be addressed with these limited federal funds.

Harris County, one of twenty HUD identified most impacted and distressed counties from the Hurricane Harvey disaster, is in dire need of additional funding for drainage improvements. There has been an acute need for funding based on a large funding gap for infrastructure projects tied to drainage for the county. With the continued support from the funding for infrastructure projects in

the Harris County region, the state will ensure the protection of people and property while expediting the prudent delivery of funds for those impacted by Hurricane Harvey.

At least eighty (80) percent of program funds, including planning activities, will benefit HUD-identified "most impacted and distressed" areas (counties and ZIP codes). Sections 5.1, 5.2, and 5.3 outline the use of funds, including planning activities, for the State, Harris County, and the city of Houston. Harris County and the city of Houston are in the HUD MID.

A. Cumulative Impact of Prior Disasters

The state of Texas is vulnerable to various extreme weather events, typically those that cause or exacerbate flooding. Recently, Texas experienced a historic drought that began in 2010. According to the Office of the State Climatologist, the driest 12-month period on record for Texas was October 2010 to September 2011, with a statewide average of only 11.18 inches of rain. This led to catastrophic wildfires that lasted from November 15, 2010, through October 31, 2011. A total of 3.9 million acres and approximately 5,900 structures were damaged and/or destroyed during this wildfire season. Many factors contributed to this record-breaking season, including the La Niña weather pattern that caused extreme drought conditions, high winds from Tropical Storm Lee, and unprecedented high temperatures. These weather conditions, combined with the availability of large amounts of dry fuels that had built up over 5 years of drought, led to the intensity of these wildfires.

The extended drought that Texas experienced made the state susceptible not only to wildfires but to flash flooding as well. These drought factors contributed to the inability of soils to effectively absorb water runoff. The 2011 wildfires also removed vegetation that usually work to slow down and absorb rainfall.

In 2015 and 2016, the state received record amounts of rain—not once but multiple times. This resulted in six Federal disaster declarations spread over 160 of the state's 254 counties. The critical infrastructure damage and already saturated grounds from the 2015 floods greatly enhanced the devastation experienced by counties during the 2016 floods. These multiple events caused multiple human fatalities and did severe damage across nearly half the state, or 134,000 square miles. To date, the state of Texas still estimates $2 billion in unmet need from these events.

The below map highlights the counties that have been impacted by the last 3 years of disasters. The majority of counties in the eligible area have been impacted by disasters in each of the last three years. This further demonstrates the compounding impacts of recent disasters in Texas and the impacts that these disasters are having on housing, infrastructure, and local economies along the coast.

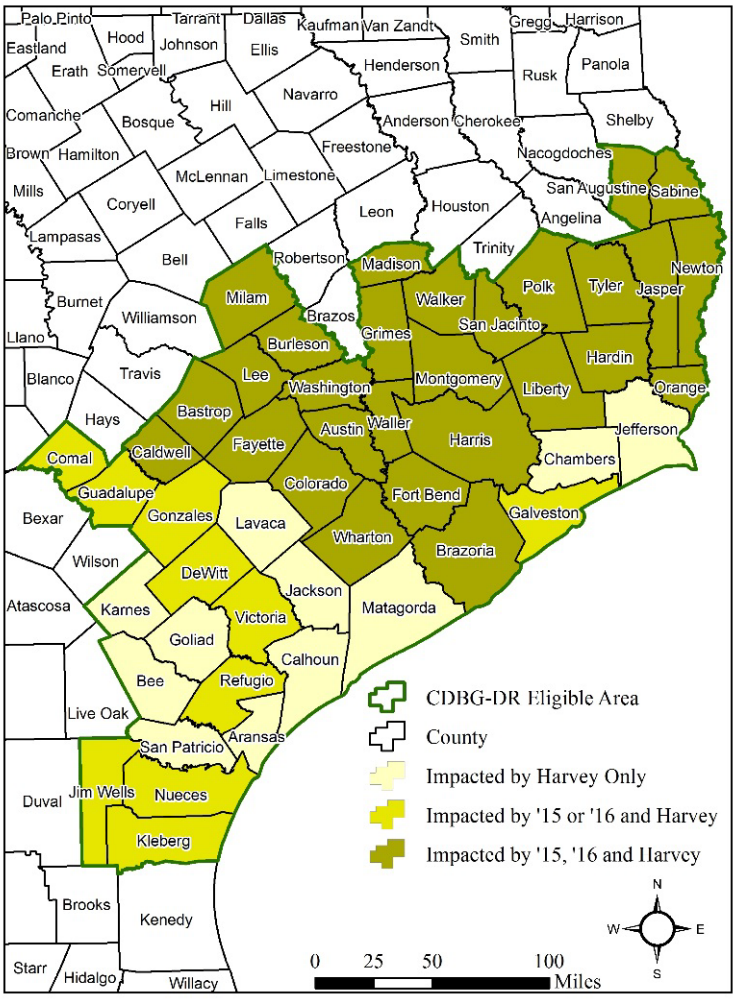


Figure 2: Hurricane Harvey CDBG-DR Eligible Counties Impacted by 2015 Floods, 2016 Floods and Harvey Declarations

B. Impact of Hurricane Harvey

In 2017, communities that had not yet had a chance to fully recover from the 2015 and 2016 floods were impacted again. Hurricane Harvey, a regenerated tropical depression, made landfall on August 25, 2017, as a Category 4 hurricane, bringing with it extreme wind gusts and, in some places, up to 60 inches of rain in 5 days. The hurricane caused catastrophic flooding and at least 82 human fatalities,[4] due in part to the weather system stalling over the Texas coast. The windspeeds recorded over South Texas may have been underestimated, especially near the coast and close to the eyewall of Hurricane Harvey, as many observation stations were disabled prior to

[4] The Washington Post. "Texas officials: Hurricane Harvey death toll at 82, 'mass casualties have absolutely not happened." Webpage accessed January 10, 2018. https://www.washingtonpost.com/national/texas-officials-hurricane-harvey-death-toll-at-82-mass-casualties-have-absolutely-not-happened/2017/09/14/bff3ffea-9975-11e7-87fc-c3f7ee4035c9_story.html?utm_term=.dfe744e2fbe8

landfall of the eye of the hurricane; however, a peak wind gust of 150 mph was reported near Rockport. [5]

According to the Texas Legislative Budget Board (LBB), the state of Texas reports over $2.6 billion in actual Hurricane Harvey related state expenditures in Fiscal Years (FY) 2017 and 2018, of which almost $1.7 billion has been federally funded. Almost $1.9 billion in total State costs is projected for FY 2018. These numbers do not account for potential significant state public school finance expenses primarily driven by facility damage costs and property value declines. Included in the FY 2018 number is the expenditure of $14.2 million of an emergency appropriation of $90 million from Solid Waste Disposal Fees to help local governments pay their required local match for debris removal. Most of these expenses will require supplemental appropriations in FY 2019, in order for agencies to remain solvent through the fiscal biennium. [6] In the meantime, this funding was made available through emergency budget mechanisms and the transfer of funds from intended uses and even from other agencies. In addition to these direct costs, the state estimates a net loss in gross state product (GSP) in FY 2018 of $3.8 billion following Hurricane Harvey. [7]

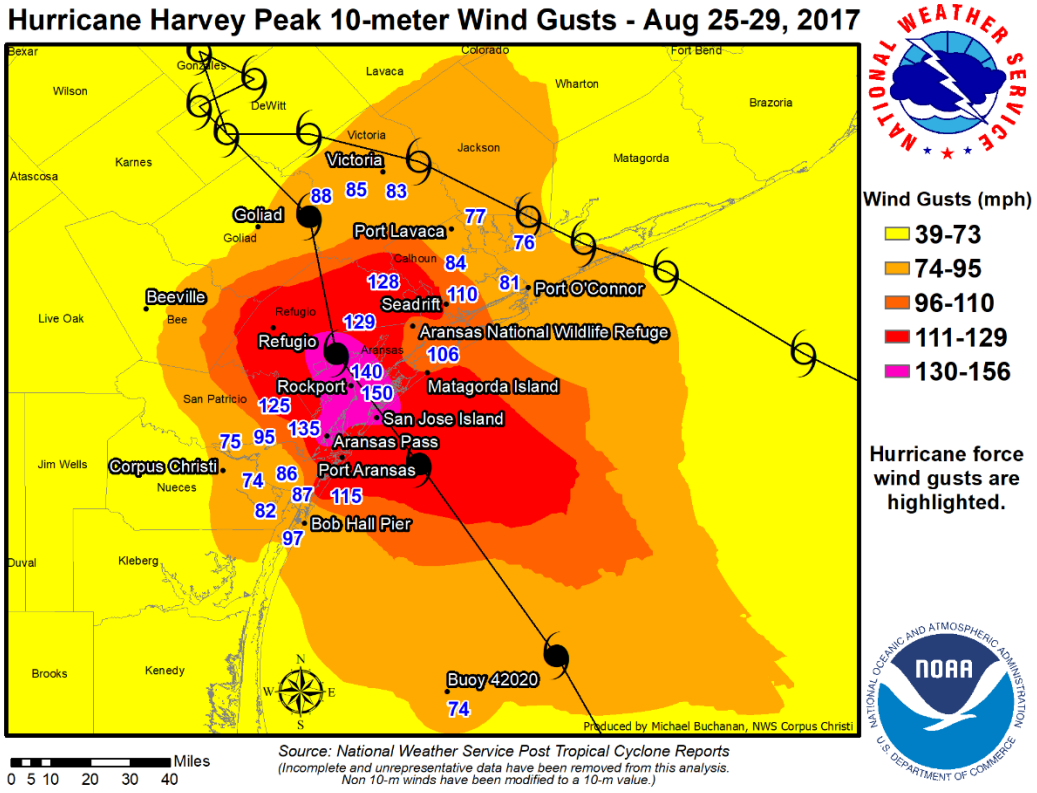


Figure 3: Hurricane Harvey Peak Wind Gusts

[5] National Weather Service. "Major Hurricane Harvey - August 25-29, 2017." Webpage accessed January 10, 2018. http://www.weather.gov/crp/hurricane_harvey

[6] Texas Legislative Budget Board. 2018. "Hurricane Harvey: Fiscal Analyses and Resources." Webpage accessed September 7, 2018. http://www.lbb.state.tx.us/Harvey.aspx

[7] Texas Comptroller of Public Accounts. "A Storm to Remember: Hurricane Harvey and the Texas Economy." Webpage accessed September 7, 2018. https://comptroller.texas.gov/economy/fiscal-notes/2018/special-edition/

Hurricane Harvey made landfall twice and is viewed by many as three separate events: the initial landfall in Aransas County; unprecedented rainfall in the Houston metroplex and surrounding areas; and the second landfall on August 29, 2017, in southeast Texas near the cities of Orange, Beaumont, and Port Arthur. These events caused not only wind damage but also widespread flooding.

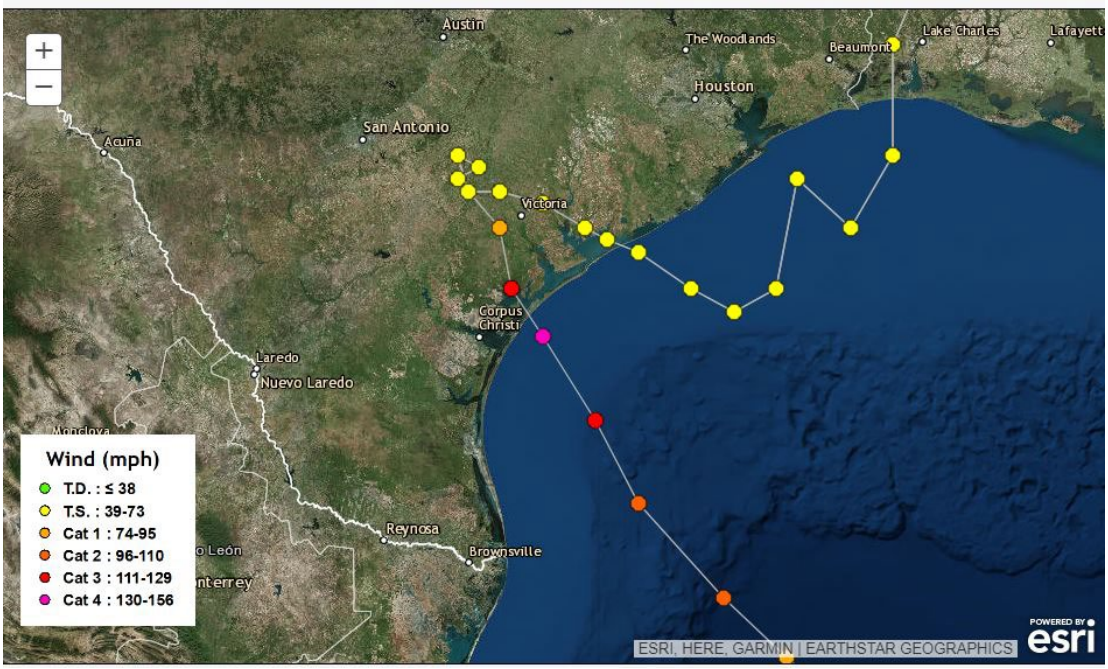


Figure 4: Track of Hurricane Harvey [8]

The 49 CDBG-DR eligible counties affected by Hurricane Harvey cover 15 percent or 39,496 square miles of land area in the state and contain approximately 32 percent of the state's population. The land area affected is roughly the size of the state of Kentucky. [9] Nearly 9 million Texans live in the affected counties.

As can be seen in the following map, the initial landfall caused severe wind damage (demonstrated by the number of windstorm damage insurance claims in red). This map also portrays the extent of NFIP claims in the northern section of the coast, where storm rains caused severe flooding in Houston and the surrounding areas. This graphic further demonstrates the two catastrophic characteristics of Hurricane Harvey: (1) hurricane-force winds and (2) a slow-moving storm bringing historic rainfall and flooding.

[8] National Weather Service. "Major Hurricane Harvey - August 25-29, 2017." Webpage accessed January 10, 2018. http://www.weather.gov/crp/hurricane_harvey

[9] The United States Census Bureau. "QuickFacts Kentucky; UNITED STATES." Webpage accessed January 10, 2018. https://www.census.gov/quickfacts/fact/table/KY,US/LND110210

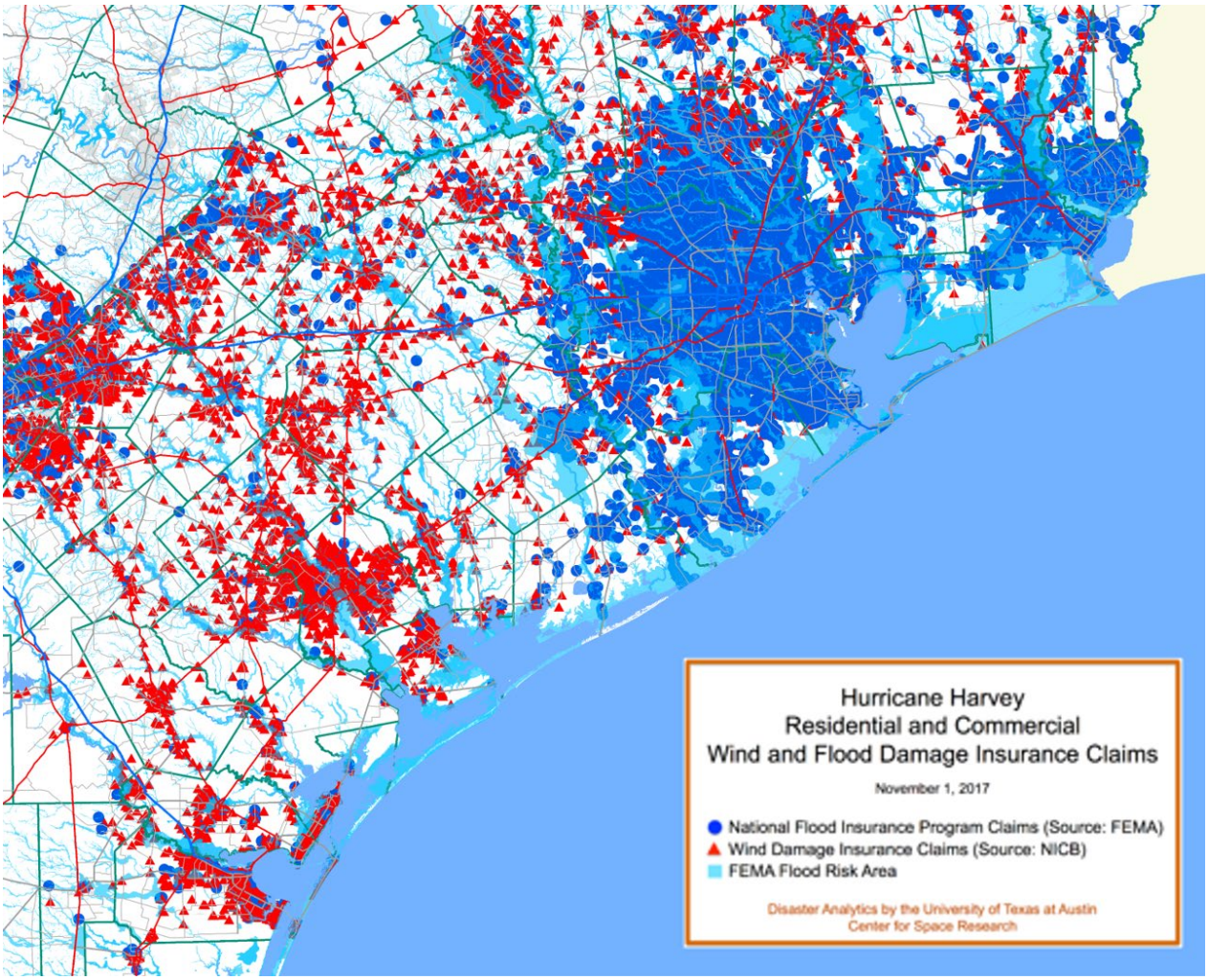


Figure 5: Residential and Commercial Windstorm and Flood Damage Insurance Claims

By the time the rain stopped, Hurricane Harvey had dumped almost a year's worth of rainfall in just a few days. So much rain fell during the hurricane that the National Weather Service had to update the color charts on their graphics in order to effectively map it. Two additional shades of purple were added to represent rainfall totals for 20-30 inches and "greater than 40 inches" ranges.

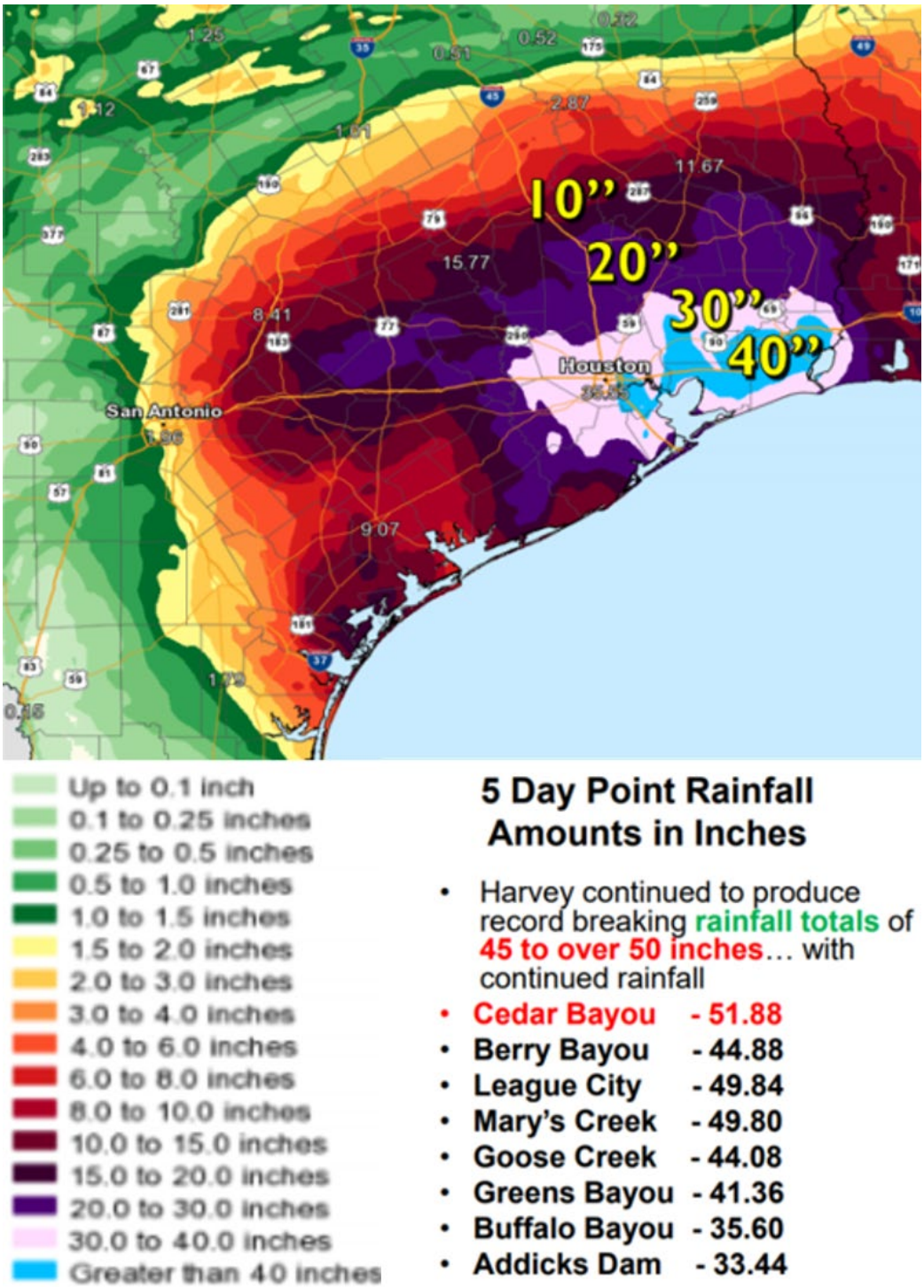


Figure 6: National Weather Service’s 5 Day Point Rainfall in Inches

C. Resiliency Solutions and Mitigation Needs

Recognizing the state’s long and well-documented history of flooding, hurricanes, wildfires, and droughts, as well as its ongoing efforts to mitigate future disaster effects in its most vulnerable

areas, the GLO continues its commitment to rebuilding while prioritizing resiliency. In assessing unmet needs, it is important to consider the additional costs of safeguarding housing and community infrastructure investments from future disasters. As such, Texas will not only assess projects and consider state-run programs that replace or repair lost property but will also seek to invest resources in efforts that promise to mitigate damage from a wide range future disaster types. Although this can increase costs initially, mitigating efforts can greatly reduce the cost of future damages by a ratio of 6:1. The success of this long-term recovery practice was seen firsthand during Hurricane Harvey. Resilient-enhanced projects from previous CDBG-DR efforts suffered less damage from Hurricane Harvey: construction projects designed to prevent future flooding, mitigate further loss, and decrease evacuation times.

Single family home resiliency solutions are expected to add approximately 10 to 15 percent to the total cost per home; multi-family resiliency solutions add 15 to 20 percent to the total cost per project; and infrastructure resiliency solutions add 15 to 20 percent to the total cost per project. Resiliency solutions are varied and dependent on the respective area's Threat and Hazard Identification and Risk Assessment.

Single family home resiliency solutions may include elevating the first floor of habitable area; breakaway ground floor walls; reinforced roofs; storm shutters; use of ENERGY STAR appliances and fixtures; and mold and mildew resistant products. Multi-family resiliency solutions include elevation; retention basins; fire-safe landscaping; firewalls; and landscaped floodwalls.

Buyout programs support hazard mitigation, floodplain management goals, and resiliency by removing homeowners from the floodplain, thus eliminating vulnerability to future flooding situations. After homes are purchased, the structures are demolished or relocated. The land reverts to a natural floodplain, converts into a retention area, or is retained as green space for recreational purposes. The buyout option serves multiple objectives and provides a resiliency option versus rebuilding within a floodplain. Buyouts help prevent repetitive loss and extreme risk to human health and safety. Buyouts conducted sooner rather than later prevent homeowners from making repairs and investing funds in properties that they then may not want to sell.

In the case of infrastructure resiliency solutions, improvements may include:

- Elevating critical systems, facilities, and roadways above base flood elevation;
- Installing backup power generators for critical systems (water, sewer, etc.);
- Avoiding an increase in impervious cover by keeping projects in their original footprint and encouraging the use of building practices that allow for more pervious coverage;
- Replanting with only native vegetation to preserve the natural environment;
- Storm water management including installing retention basins, larger culverts and debris guards, erosion control solutions;
- Back-up communication systems; and
- Supporting local community efforts to enhance building codes and regulations.

The resiliency multiplier will be a standard 15 percent for both housing and infrastructure activities to calculate unmet need, as has previously been applied in other Texas CDBG-DR programs.

D. Demographic Profile of Impacted Counties

The demographic profile data was generated using a wide range of data sets from the U.S. Census Bureau, unless otherwise noted. The 49 CDBG-DR eligible counties affected by Hurricane Harvey cover 15 percent, or 39,496 square miles of the state, and contain approximately 32 percent of the state's population. This equals nearly 9 million Texans living in the eligible counties. These counties have seen almost a 1 million person, or 12 percent, increase from 2010 to 2016.

Of the 3.4 million housing units in the eligible counties in 2016, 62.5 percent are owner-occupied units. Some housing and income demographics are slightly different in the eligible counties versus the statewide averages. The 49 eligible counties have an estimated median owner-occupied housing unit value and median household income lower than the state as a whole. The median value of owner-occupied housing units is $105,800—almost $37,000 less than the statewide median value of $142,700. The 49 eligible counties have a median household income of $50,145 – $4,582 less than the statewide average of $54,727. In addition to a lower median household income, the per capita income is also lower than the state as a whole. Approximately 14.9 percent of the population in the 49 eligible counties is living in poverty. This is just less than the statewide average of 15.6 percent.

By percentage, the 49 eligible counties have a higher African-American population when compared to the state as a whole. The 49 eligible counties have a 16.3 percent African-American population—approximately 3.6 percent higher than the statewide total. The minority population as a whole in all 49 eligible counties is approximately 60 percent—2.5 percent higher than the statewide total.

In the 49 eligible counties, veterans account for 4.9 percent of the population; the elderly account for 12.02 percent; and disabled persons under the age of 65 account for 7.54 percent of the population. These numbers are in line with state averages.

Table 6: 2016/2017 Demographic Statistics for Texas and the 49 CDBG-DR Eligible Counties from the U.S. Census Bureau

	Texas	49 CDBG-DR Eligible Counties	
Fact	**Estimates**	**Estimates**	**Percent of Area**
Population estimates, 2017	28,304,596	8,999,345	32% of Texas Population
Population, percent change - April 1, 2010, (estimates base) to July 1, 2017	12.60%	14%	
Persons under 5 years, percent, 2017	7.20%	651,207	7.24% of Eligible Population
Persons under 18 years, percent, 2017	26.00%	2,349,074	26.10% of Eligible Population

	Texas	49 CDBG-DR Eligible Counties	
Fact	**Estimates**	**Estimates**	**Percent of Area**
Persons 65 years and over, percent, 2017	12.30%	1,082,155	12.02% of Eligible Population
White alone, percent, 2017	79.20%	6,673,001	74.15%
Black or African American alone, percent, 2017	12.70%	1,467,075	16.30%
American Indian and Alaska Native alone, percent, 2017	1.00%	90,271	1.00%
Asian alone, percent, 2017	5.00%	586,911	6.52%
Native Hawaiian and Other Pacific Islander alone, percent, 2017	0.10%	9,040	0.10%
Two or More Races, percent, 2017	2.00%	168,571	1.87%
Hispanic or Latino, percent, 2017	39.40%	3,340,948	37.12%
White alone, not Hispanic or Latino, percent, 2017	42.00%	3,551,047	39.46%
Housing units, 2017	10,932,870	3,500,524	
Owner-occupied housing unit rate, 2012-2016	61.90%	2,152,669	62.5% of Housing Units
Median value of owner-occupied housing units, 2012-2016	$142,700	$105,800	
Median gross rent, 2012-2016	$911	$777	
With a disability, under age 65 years, percent, 2012-2016	8.10%	678,268	7.54% of Eligible Population
Median household income (in 2016 dollars), 2012-2016	$54,727	$50,145	
Persons in poverty, percent	15.60%	14.9% of Eligible Population	
Land area in square miles, 2010	261,231.71	39,496	15% of Texas

E. Low- and Moderate-Income Analysis

The following map identifies census block groups that have a low- and moderate-income (LMI) population of 51 percent or more for the 49 eligible counties using HUD's 2018 LMI Summary Data (LMISD) for the state of Texas. [10]

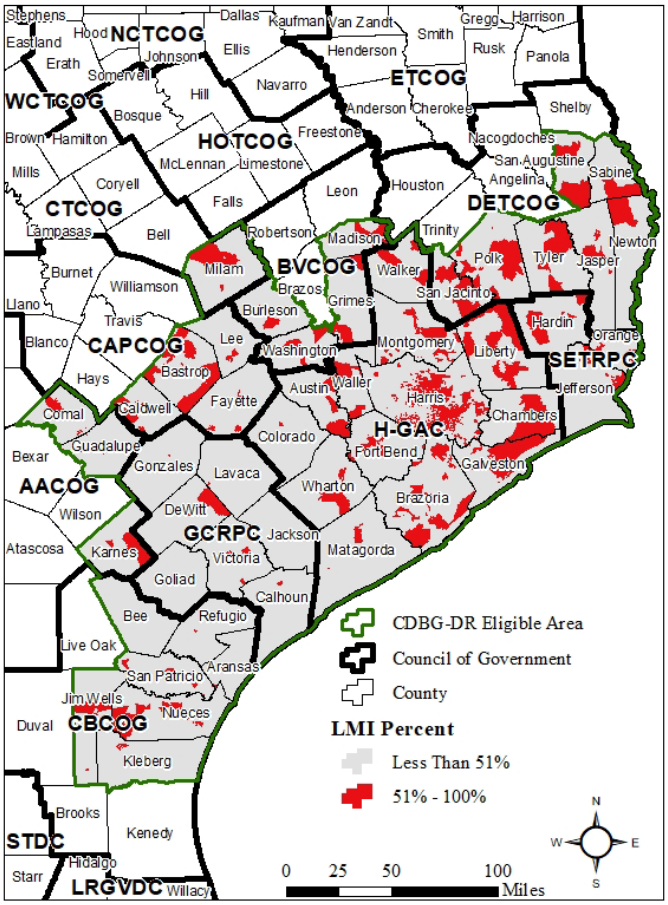


Figure 7: Percentage of LMI Population by Block Group (Updated in APA 2)

F. Social Vulnerability Index

An additional component to consider when looking at unmet needs for impacted counties in Texas is what level of social vulnerability to natural hazards are they experiencing. The Social Vulnerability Index (SoVI) measures the social vulnerability of counties across the United States — in particular, their vulnerability to environmental hazards. This index, developed by the University of South Carolina's Hazards & Vulnerability Research Institute, synthesizes 29 socioeconomic variables which contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties. It is a valuable tool because it graphically

[10] HUD Exchange. "FY 2017 LMISD by State - All Block Groups, Based on 2006-2010 American Community Survey." Webpage accessed January 10, 2018. https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/

illustrates the geographic variation in social vulnerability, which in turn contributes greatly to response and recovery capabilities. SoVI shows where there is uneven capacity for disaster preparedness and response, and where resources might be used most effectively to reduce pre-existing vulnerability. The data sources for the development of SoVI come primarily from the United States Census Bureau. The SoVI data combines the best available data from both the 2010 U.S. Decennial Census and five-year estimates from the American Community Survey (ACS). The below map demonstrates the SoVI for the 49 CGBG-DR eligible counties in Texas. Additionally, the SoVI scores at the Census Tract level provides a more granular assessment of vulnerability within each county.

The SoVI details above are further explained by some of the characteristics at the individual level that affect vulnerability. One of these characteristics is that of Socioeconomic Status which affects the ability of a community to absorb losses and be resilient to hazard impacts. This is due to the idea that wealth enables communities to absorb and recover from losses using insurance, social safety nets, and entitlement programs. Other factors used in SoVI relate to gender as well as race and ethnicity being that these factors impose language and cultural barriers and affect access to post-disaster funding. Additional factors used in SoVI are special-needs populations, social dependence (i.e. people who are totally dependent on social services for survival), education, family structure, occupation, and other demographic characteristics that help to define social vulnerability for communities and individuals.

Effectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster. While a stand-alone component when compared to total unmet need and other factors like per capita unmet need, the SoVI contributes to the ultimate funding decision process by adding a layer that looks at the components involved closely with an individual's or community's effort to recover from a disaster event. The SoVI is then coupled with total unmet need and unmet need per capita to distribute funds.

Counties with highest vulnerability when compared relatively to each other are Bee, Karnes, Madison, and Jim Wells. Counties with some of the lowest vulnerability are Fort Bend, Brazoria, and Chambers.

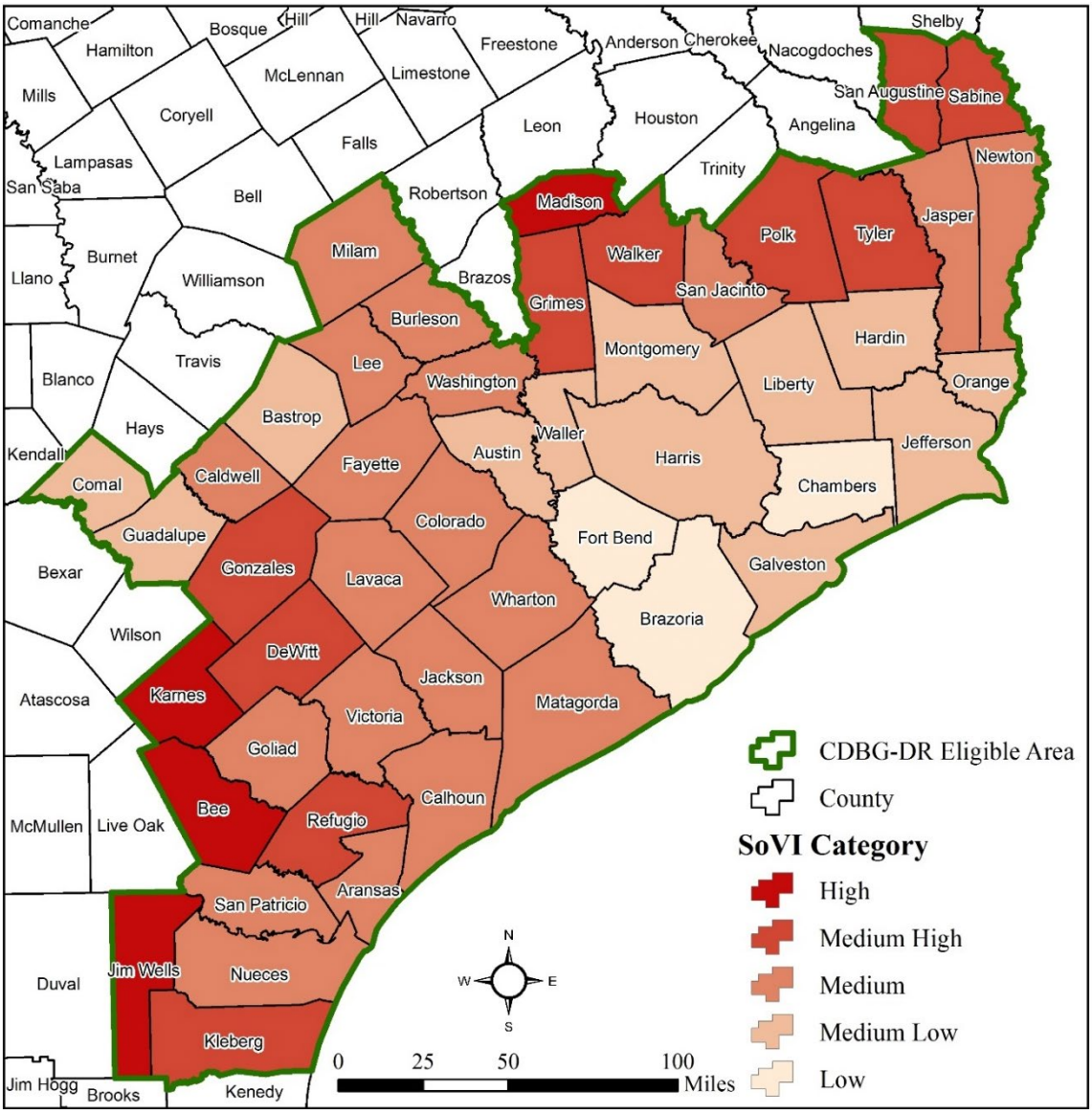


Figure 8: County SoVI by Category

G. Housing Impact

1. Real Estate Market

The housing real estate market in Texas remains strong with a high housing demand and a tight supply. As stated by Texas A&M's Real Estate Center's August 2017 report prior to Hurricane Harvey, the months of inventory of Texas houses increased to 3.9 months for the first time since 2014; this indicates strong housing demand and tight supply. Around 6 months of inventory is considered a balanced housing market. Texas housing affordability continues to worsen due to limited supply for homes under $300,000, along with increasing construction

costs. [11] In an already tight market, the loss of housing associated with Hurricane Harvey only compounds affordability issues in the state.

The housing markets on the Gulf Coast dipped substantially in August due to Hurricane Harvey; however, the market saw a large rebound in September. Housing sales that were delayed because of Hurricane Harvey in August caused a 2.6 percent increase in September, as those sales were executed post-storm. Third quarter increases in vacant, developed lots also generated a 5.4 percent monthly increase in single family housing construction permits. This increase was directly related to recovery efforts in places like Houston. [12]

2. Homelessness

Based on the assessment regarding pre-disaster homeless persons and the GLO's work with other state agencies and organizations, the state is working to address the needs of pre-disaster homeless persons.

In January 2017, Texas accounted for 4.25 percent of the nation's total homeless population. However, given the size and population of the state, Texas has seen one of the largest decreases (30.8 percent decline) in homelessness from 2012 to 2017. The point-in-time count (PTI) revealed that 23,548 persons in the state were physically counted as homeless in January 2017. [13] From January 2016 to January 2017, there was a slight increase of 1.8 percent in the Texas total homeless population.

The HUD 2017 Continuum of Care (CoC) data reports 29.05 percent of the total homeless population in the state is comprised of households with one adult and at least one child under the age of 18 years. [14]

Post-disaster homelessness information is not available at the time of drafting of this Action Plan. The 2018 PTI count was conducted in January. The results of this count are not available.

A CoC is the group of representatives that takes on the coordination of homeless services and homelessness prevention activities across a specified geographic area and that implements community-wide, coordinated efforts for assessing and addressing the housing and service needs of individuals and families that are homeless or at risk of homelessness.

a) State Homeless Support Services

[11] Texas A&M Real Estate Center. "Outlook for the Texas Economy." Webpage accessed January 10, 2018. https://www.recenter.tamu.edu/articles/technical-report/outlook-for-the-texas-economy

[12] Texas A&M Real Estate Center. "November 2017 Housing Reports by MSAs." (data as of October 31, 2017)

[13] HUD Exchange. "2007 – 2017 Point – Time Counts by CoC." Webpage/Excel document accessed January 10, 2018. https://www.hudexchange.info/resources/documents/2007-2017-PIT-Counts-by-CoC.xlsx

[14] HUD Exchange. "2017 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations." Webpage accessed January 10, 2018. https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_CoC_OH-507-2017_OH_2017.pdf

Texas has a fairly widespread and robust homeless support services program. The Texas Homeless Network is a statewide nonprofit organization funded in part by the Texas Department of Housing and Community Affairs (TDHCA) and the Texas Department of State Health Service (DSHS). The Texas Homeless Network provides training and technical assistance around the state to help service providers and communities better serve the homeless population with the end goal of preventing and ending homelessness. [15]

TDHCA's Homeless Housing and Services Program (HHSP) provides funding to the eight largest cities in support of services to homeless individuals and families. The cities currently served through HHSP are Arlington, Austin, Corpus Christi, Dallas, El Paso, Fort Worth, Houston, and San Antonio. For FY 2015, 2016, and 2017, $15 million has been allocated to HHSP. The allowable activities include construction, development, or procurement of housing for homeless persons; rehabilitation of structures targeted to serving homeless persons or persons at risk of homelessness; provision of direct services and case management to homeless persons or persons at risk of homelessness; or other homelessness-related activities.

The Emergency Solutions Grants (ESG) program, formerly the Emergency Shelter Grants Program, is a competitive grant that awards funds to private nonprofit organizations, cities, and counties in the state of Texas to provide the services necessary to help persons that are at risk of homelessness or homeless quickly regain stability in permanent housing. The ESG program is funded by HUD and is administered by TDHCA. In 2016 and 2017, TDHCA has awarded over $17 million to eligible subrecipients battling homelessness across the state.

The Texas HOME Disaster Relief program is administered by TDHCA. The program is available to local governments, nonprofit organizations, and public housing authorities within a federal or state-declared county to serve households earning at or below 80 percent Area Median Family Income (AMFI). Eligible activities include the HOMEowner Rehabilitation Assistance Program, Tenant-Based Rental Assistance Program, and HOMEbuyer Assistance Program. As of December 2017, over $10 million is available in the Texas HOME Disaster Relief Program. [16]

Additionally, the Texas Interagency Council for the Homeless (TICH) was established in 1995 and coordinates the state's resources and services to address homelessness. TICH serves as an advisory committee to TDHCA. Representatives from 11 state agencies sit on the council, along with members appointed by the governor, lieutenant governor, and speaker of the house of representatives. [17] The council's duties include:

- Survey current resources for services for the homeless in the state;
- Assist in coordinating and providing statewide services for all homeless individuals;

[15] Texas Homeless Network. Webpage accessed January 10, 2018. http://www.thn.org/

[16] TDHCA. "HOME Disaster Relief Program." Webpage accessed January 10, 2018. http://www.tdhca.state.tx.us/home-division/disaster-relief.htm

[17] TDHCA. "Texas Interagency Council for the Homeless" (TICH). Webpage accessed January 10, 2018. http://www.tdhca.state.tx.us/tich/

- Increase the flow of information among separate providers and appropriate authorities;
- Provide technical assistance to TDHCA in assessing the need for housing for individuals with special needs in different localities; and
- Maintain a centralized resource and information center for homeless services.

The Department of State Health Services (DSHS) Projects for Assistance in Transition from Homelessness (PATH) program provides outreach in the form of (1) screening, diagnostic assessment, and treatment; (2) habitation and rehabilitation; (3) community mental health services; (4) outpatient alcohol or drug treatment; (5) staff training and case management; (6) referrals for primary health services, job training, educational services (including HIV prevention activities), and relevant housing services; (7) assistance in obtaining income support services including Social Security Income and representative payee per appropriate regulations; (8) housing services including planning for housing; (9) technical assistance in applying for housing assistance; and (10) improving coordination of housing and services and the costs of matching individuals with appropriate housing and services. The service areas are Amarillo, Austin, Beaumont, Conroe, Corpus Christi, Dallas, El Paso, Fort Worth, Galveston, Harlingen, Houston, Laredo, Lubbock, San Antonio, and Waco.

Additionally, the Community Services Block Grant program is administered by TDHCA. For program years 2015 to 2018, over $120 million has been awarded to eligible entities across Texas for the delivery of services to very low-income Texas residents. The services are designed to eliminate poverty and foster self-sufficiency. [18]

Even though data related to homelessness is still very preliminary, it seems apparent based on the number of housing units damaged and destroyed, the already tight Texas housing market, the number of Texans needing temporary sheltering assistance through FEMA that there is a high likelihood of Texans continuing to struggle with housing needs.

3. Social Services: 2-1-1 Texas Program

The Texas HHSC 2-1-1 Texas program helps Texas citizens connect with state and local health and human services programs service by phone or internet. THHSC works through 25 Area Information Centers (AICs) across the state. 2-1-1 Texas is a free, anonymous, social service hotline available 24-hours a day, 7 days a week, 365 days a year. State and local health and human services programs address housing/shelter, employment, food/nutrition, veterans, crisis/emergency, income/expenses, legal aid/victims, criminal justice, aging/disability, health/medical, mental health, and child care/education.

According to information received by the GLO from the HHSC, 2-1-1 staff observed a 37 percent increase in call volume beginning Thursday, August 24, 2017. Top caller needs included calls from the public requesting general evacuation information and evacuation transportation and calls from city and county emergency services. On Friday, August 25, 2017,

[18] TDHCA. "Community Services Block Grant (CSBG)." Webpage accessed January 10, 2018. http://www.tdhca.state.tx.us/community-affairs/csbg/index.htm

Texas Information and Referral Network (TIRN) staff created a new menu option that routed callers with Hurricane Harvey needs to the first available agent statewide, thus prioritizing those callers.

Between August 25 and October 31, 2017, the 2-1-1 TIRN received approximately 670,000 calls. The call summary below shows the volume of calls received pre-Harvey, during Harvey (August 25–September 30) and post-Harvey.

The table below shows the approximate number of calls divided into time periods before, during, and immediately following Hurricane Harvey, as well as post-Hurricane Harvey. In the period during Hurricane Harvey and directly after, there was a large jump in State of Texas Emergency Assistance Registry (STEAR) calls. STEAR is a free registry that provides local emergency planners and emergency responders with additional information about the needs in their local community. This program allows the public to add their information to the registry if they feel they will require additional assistance during an emergency or disaster event.

Table 7: 2-1-1 Call Volume

	Option 1, 4, 8 (TIRN Agents)	**Option 5** (TIRN Agents)	**Total**
Calls Pre-Hurricane Harvey: August 1–24, 2017	154,509	N/A	154,509
Calls during Hurricane Harvey: August 25–September 30, 2017	282,811	170,105	452,916
Calls post-Hurricane Harvey: October 1–31, 2017	177,800	36,577	214,377

Legend:

- Option 1: Community Resources Information and Referral Calls.
- Option 4: STEAR Registration Calls.
- Option 5: Harvey-Related Disaster Calls.
- Option 8: Mental Health and Substance Abuses Information and Referral Calls.

The types of needs also varied during these time periods. Prior to Hurricane Harvey, the top two needs TIRN agents addressed were calls about were electric service payment assistance and rent payment assistance. During and directly following the hurricane, the top two needs were disaster food stamps and electric payment assistance. Disaster food stamps were available through Texas Health and Human Services Disaster Supplemental Nutrition Assistance Program (D-SNAP) to provide short-term food assistance benefits to families recovering from a disaster. [19]

The following chart shows top 10 needs of calls received and the volume of calls for the period during and directly following Hurricane Harvey.

[19] Texas Health and Human Services. "Disaster SNAP." Webpage accessed January 10, 2018. https://hhs.texas.gov/services/financial/disaster-assistance/disaster-snap

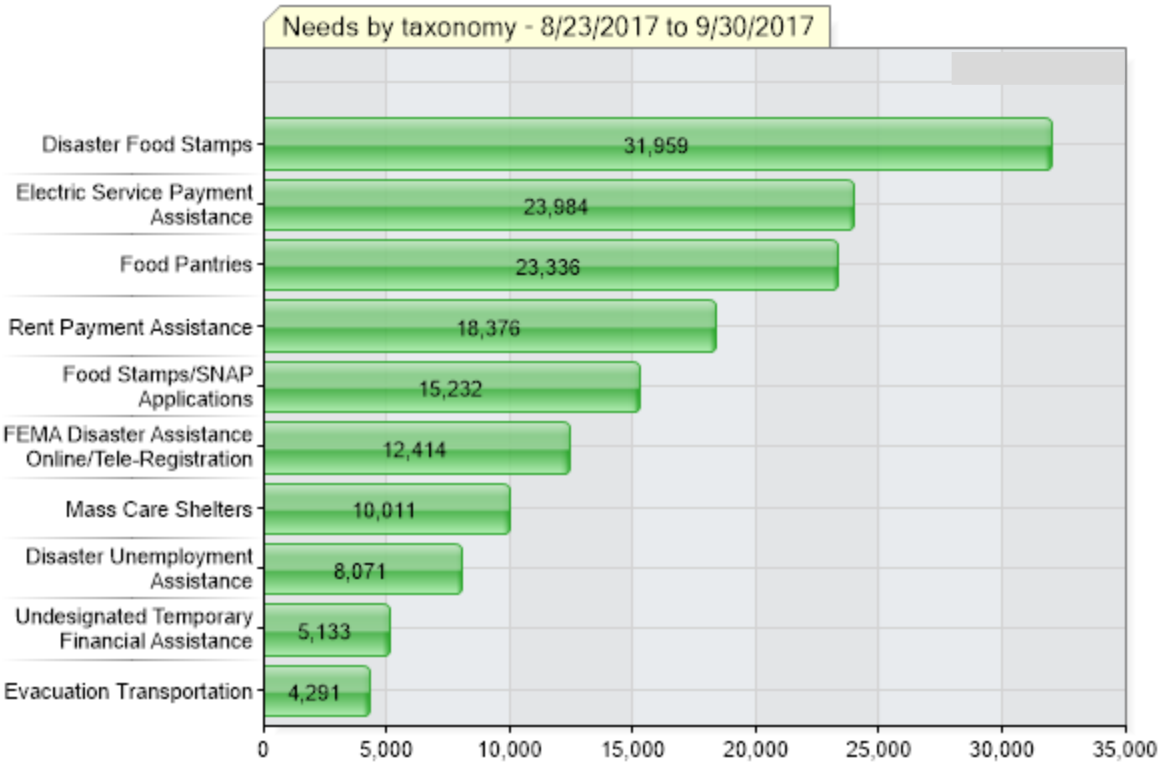


Figure 9: Top 10 call types from August 23–September 30, 2017

The latest numbers, as of December 19, 2017, show that while calls have decreased somewhat, TIRN is still experiencing a higher call volume than prior to Hurricane Harvey. Also, the types of calls show that the call center is still receiving calls related directly to disaster recovery from Hurricane Harvey, as seen in the following chart.

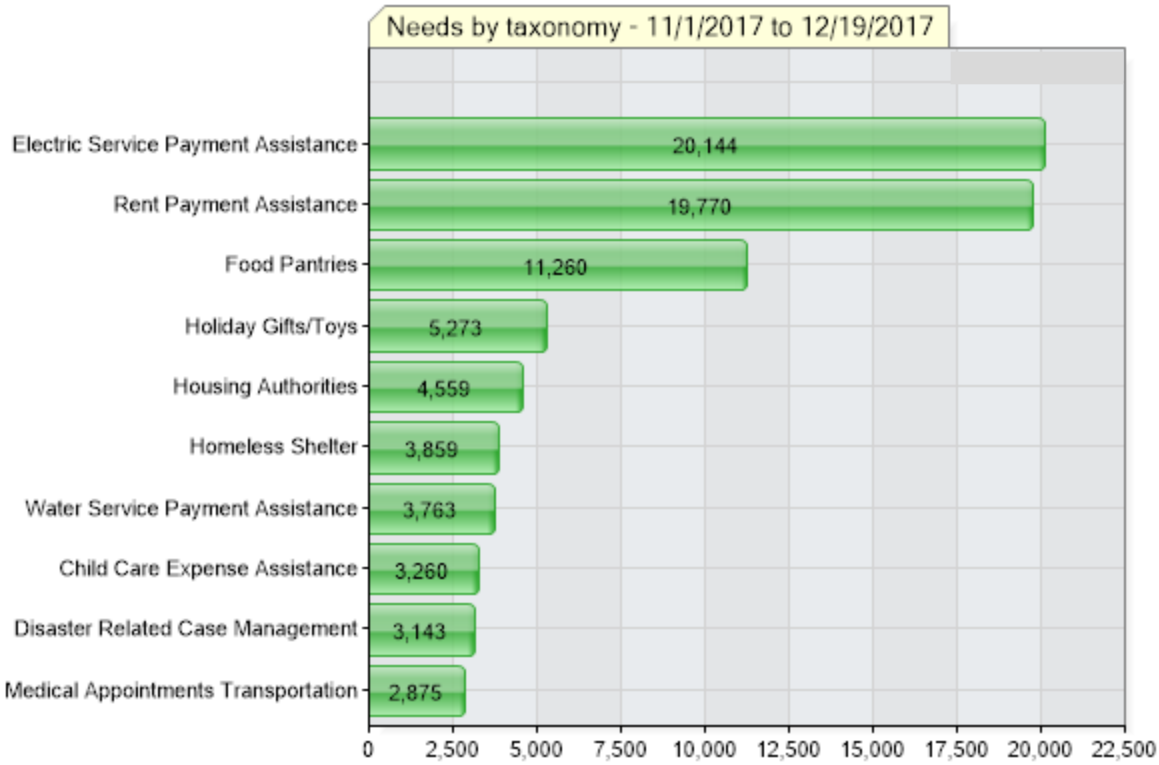


Figure 10: Top 10 call types from November 1–December 19, 2017

The above 2-1-1 call data provides a helpful assessment on what needs and services are being requested by callers statewide. The data is an indicator for the need for types of services, such as utility and rental assistance. The data was not used to quantify funding decisions.

4. Interim Housing Assistance

On September 14, 2017, Governor Greg Abbott designated the GLO as the state lead for short-term housing recovery programs in partnership with FEMA. These programs are intended to provide direct housing solutions for permanent repairs and temporary solutions to applicants deemed eligible by FEMA. The GLO will continue to administer these programs until February 25, 2019. Program descriptions include:

a) Multi-Family Lease and Repair

This program provides repairs to existing multi-family housing, such as apartments, in order to provide more housing for eligible applicants. By accepting repairs, property owners must agree to lease to eligible applicants for up to 18 months (February 2019) following the disaster declaration. This program provides much needed housing for applicants, as well as much needed repairs to multi-family housing units that may have been impacted during the disaster. At the end of 18 months, the temporary assistance ends for the applicants.

b) Direct Lease

This program allows the GLO and its subrecipients to enter into leases for properties. Through the utilization of these properties, the program provides housing for eligible applicants for up to 18 months (February 2019) following the disaster declaration. At the end of 18 months, the temporary assistance ends for the applicants.

c) Manufactured Housing Options

This program places manufactured housing units, such as mobile homes and travel trailers, on private land or commercial pads to temporarily house eligible applicants for up to 18 months (February 2019) following the disaster declaration. At the end of 18 months, the temporary assistance ends for the applicants.

d) Direct Assistance for Limited Home Repair

This program provides permanent partial repairs to homes with significant damage. Repairs cannot exceed the lesser of 50 percent of the home's fair market value (FMV) or $60,000.

e) Partial Repair and Essential Power for Sheltering (PREPS)

This program provides temporary repairs of up to $20,000 for homes with less than $17,000 in damage. Temporary repairs may include window units, one (1) functional bathroom, and small cooking appliances to ensure that the home can serve as a shelter for eligible homeowners. PREPS requires 10 percent cost share from the state.

5. Insurance

The Texas Department of Insurance's (TDI) April 12, 2018 presentation to the Texas House Insurance Committee which uses data through October 31, 2017, is the most recent report on the data collected from insurance companies, the financial impact of Hurricane Harvey, and the monitoring of claims handling. [20]

The TDI data request required companies to report the following: the number of reported claims, the number of claims closed with payment (paid claims), the number of claims closed without payment, the number of reopened claims, the number of claims with total losses, the total amount of paid losses, and the total amount of claim reserves. The data request required that companies report this data separately for following types of insurance: homeowners, residential dwelling, mobile homeowners, farm owners, business owners, the business interruption portion of commercial property, all other commercial property, personal automobile, commercial automobile, federal flood – Write Your Own (does not include policies written directly by the NFIP), private flood, and all other lines of insurance.

[20] Texas Department of Insurance. "Hurricane Harvey Data Call — Presentation to the House Insurance Committee." April 12, 2018. https://www.tdi.texas.gov/reports/documents/harvey-house-data-call-04122018.pdf

The data request included 58 counties in Governor Abbott's August 28, 2017 disaster proclamation, plus Williamson, Travis, Hays, and Hidalgo Counties. Milam and San Augustine Counties, which Governor Abbott added in the September 14, 2017 disaster proclamation, were not included.

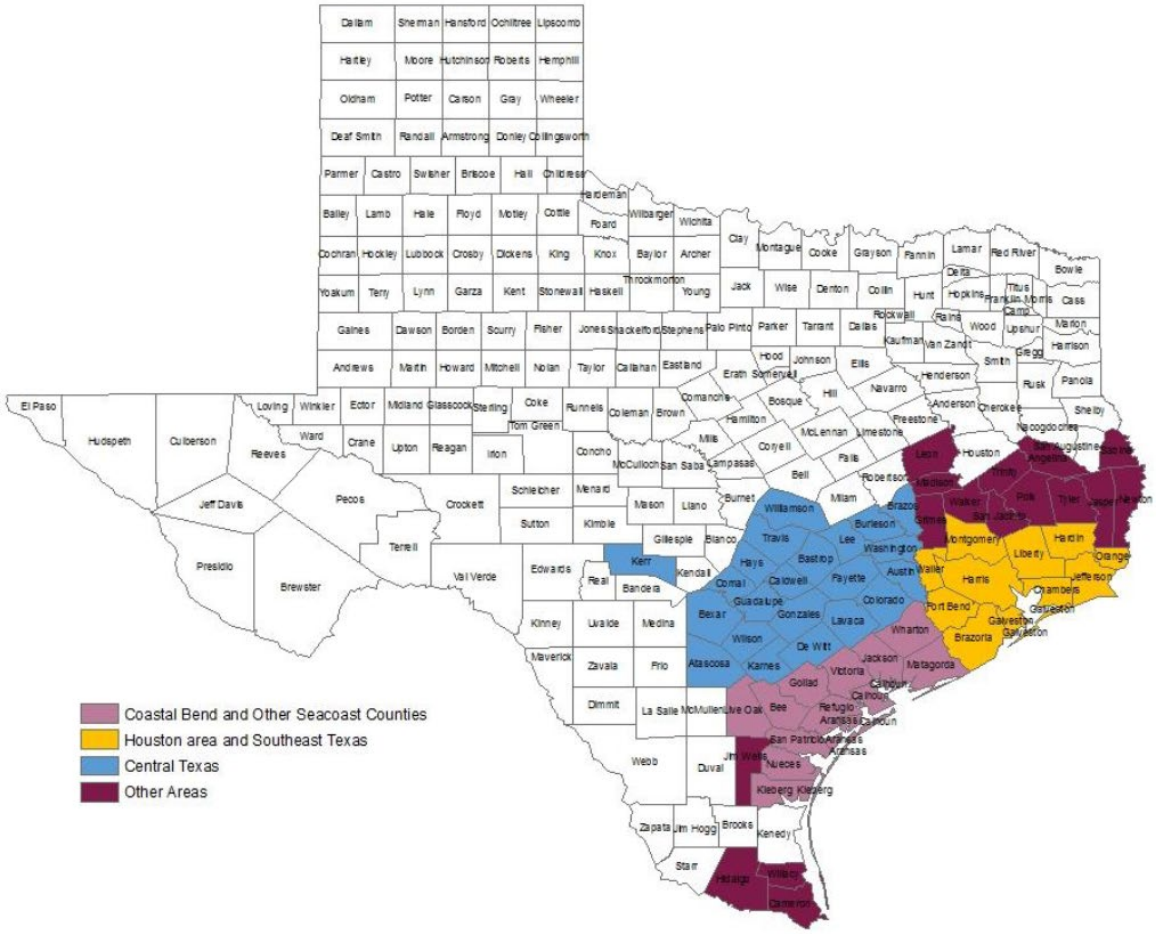


Figure 11: Hurricane Harvey Data Call Counties - Region Map

More than 99 percent of the total property and automobile market in Texas — 930 insurance companies — responded to the data request by either providing data or responding that they have no Hurricane Harvey data to report. TDI requested that the data be submitted by insurance companies by October 31, 2017, for data through September 30, 2017.

Number of Claims

A total of about 717,000 claims were filed with private insurers, TWIA, and the Texas Fair Access to Insurance Requirement (FAIR) Plan Association (TFAIRPA) for all personal and commercial lines of insurance. This included about 387,000 residential property claims and 207,000 automobile claims. Residential property consists of 246,000 homeowner claims, 123,000 residential dwelling claims, and 18,000 mobile homeowners claims.

Insurance companies have made about $7.7 billion in claim payments (paid losses), and at the time of TID's report they estimate they would ultimately pay a total of $19.4 billion. The amounts will change as more claims are reported, settled, and closed.

The majority of claims are for residential property insurance in the amount of $2.5 billion in gross losses, and $1.4 billion in paid claims. However, most of the losses are from flood and automobile claims. Automobile insurance commonly covers flood damage under "comprehensive" coverage, while residential property insurance does not typically provide coverage for flood damage.

Federal flood insurance – Write Your Own (does not include policies written directly by the NFIP) and private flood insurance reported a total of $8.4 billion in gross losses and $3.1 billion in losses paid.

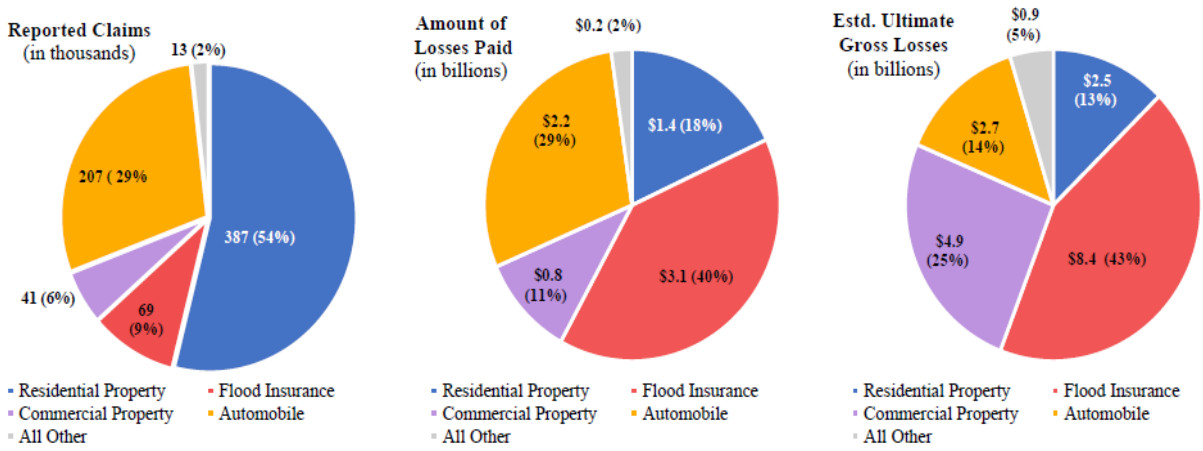


Figure 12: Total Reported Claims, Amount of Losses Paid, and Estimated Ultimate Gross Losses by Insurance Type (Updated in APA 2) [21]

Based on data from the insurers' initial reporting for residential property, approximately 40 percent of residential property claims are paid (closed with a loss payment), 35 percent of claims are closed without a loss payment, 25 percent of claims are still open, and 11 percent of claims have been reopened for all types of insurance.

A claim that is open may involve partial payments, such as payments for additional living expenses or business interruption, as well as payments for damage.

A claim without payment may have been closed due to the following: the damage fell below the deductible, the damage resulted from a peril that was not covered under the policy, the policyholder did not have a policy in effect at the time the damage occurred, or the claim was a duplicate claim.

[21] Texas Department of Insurance. "Hurricane Harvey Data Call — Presentation to the House Insurance Committee." April 12, 2018. https://www.tdi.texas.gov/reports/documents/Harvey-20180123.pdf

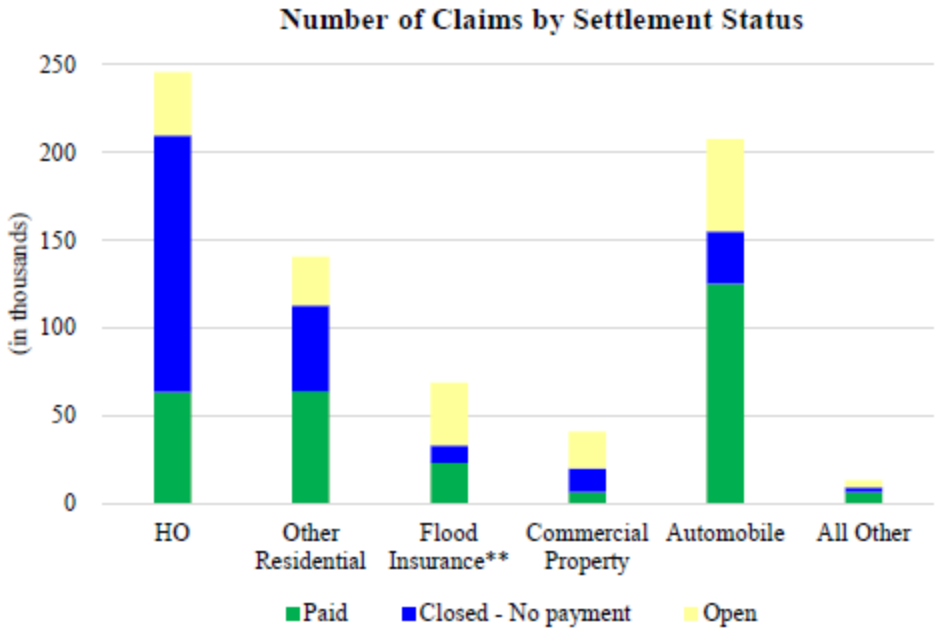


Figure 13: Number of Claims by Settlement Status and Insurance Type (Updated in APA 2)

Residential Property

The following chart shows the number of residential property claims by settlement status and area. For the counties included in area breakdown, refer to Figure 11: Hurricane Harvey Data Call Counties - Region Map. Residential property insurance includes homeowners, mobile homeowners, and residential dwelling insurance. More than 90 percent of residential property claims resulting from Hurricane Harvey are in the Coastal Bend or Houston Area regions.

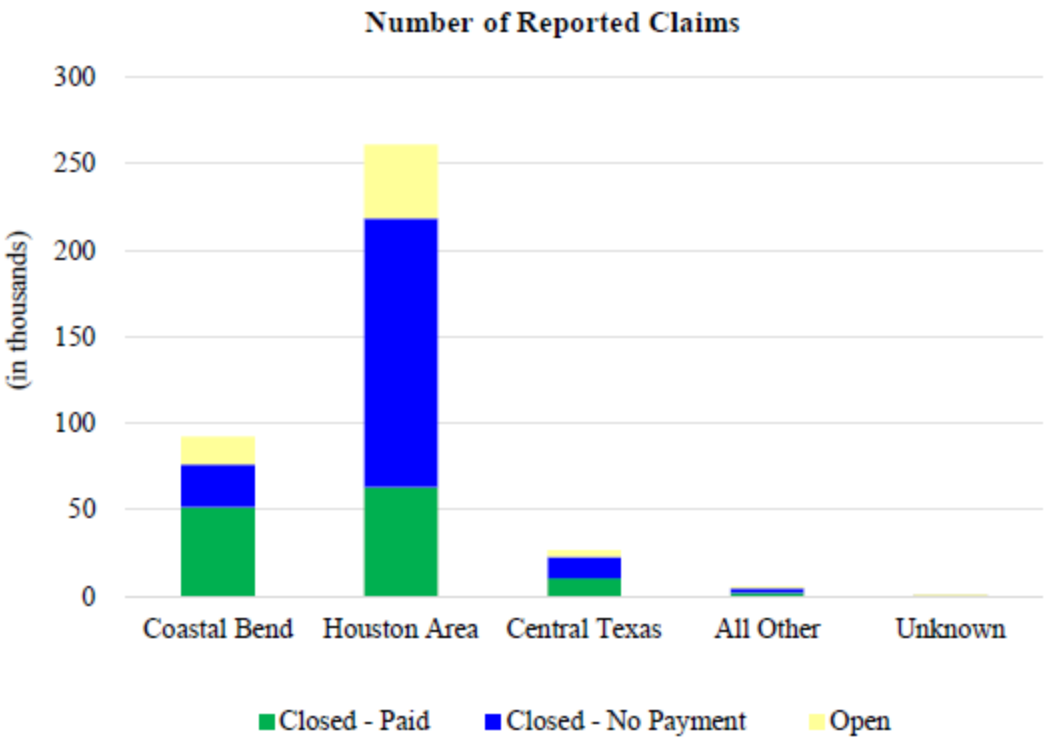
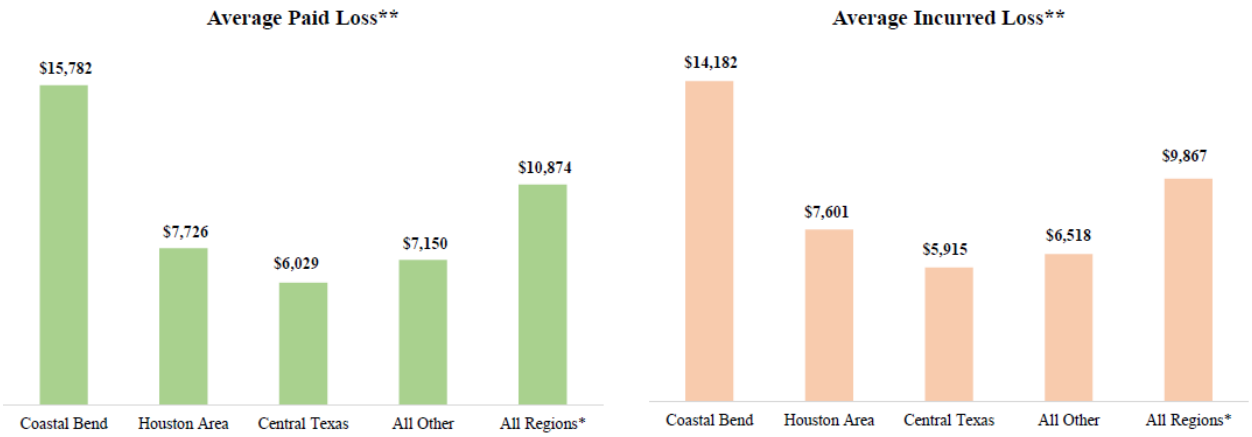


Figure 14: Number of Residential Property Claims by Settlement Status and Area (Updated in APA 2)

The Coastal Bend Region has a disproportionate amount loss – 51 percent – compared to the overall percentage of claims – 24 percent. The Coastal Bend region also had the highest average residential property loss when compared to other regions.



Figures 15: Residential Property Average Paid Loss and Average Incurred Loss by Area (Updated in APA 2)

6. National Flood Insurance Program

The NFIP is a FEMA program that works to provide affordable insurance to property owners in participating communities and works to encourage communities to adopt and enforce floodplain management regulations. In areas at high risk of flooding, Congress has mandated that federally regulated or insured lenders require flood insurance on mortgaged properties. [22] The NFIP offers two types of flood insurance coverage for homeowners: building property coverage up to $250,000; and personal property coverage (contents) up to $100,000. [23]

The following information provided by FEMA as of July 31, 2018 shows the major increase in NFIP claims in the state of Texas as a direct result of Hurricane Harvey. More than 91,000 claims were filed for losses incurred between August 23, 2017 and September 5, 2017. As of July 31, 2018, 843 (less than 1 percent) of these claims remained active/open with more than 90,000 (over 99 percent) claims closed. There are approximately 15,000 (16 percent) claims closed without payment. In total, more than $8.82 billion has been paid out on claims made during this period with the average of all payments for closed claims with payments being $115,906. With the data broken down daily during that time, a large jump in claims began on August 25, the day Hurricane Harvey made landfall.

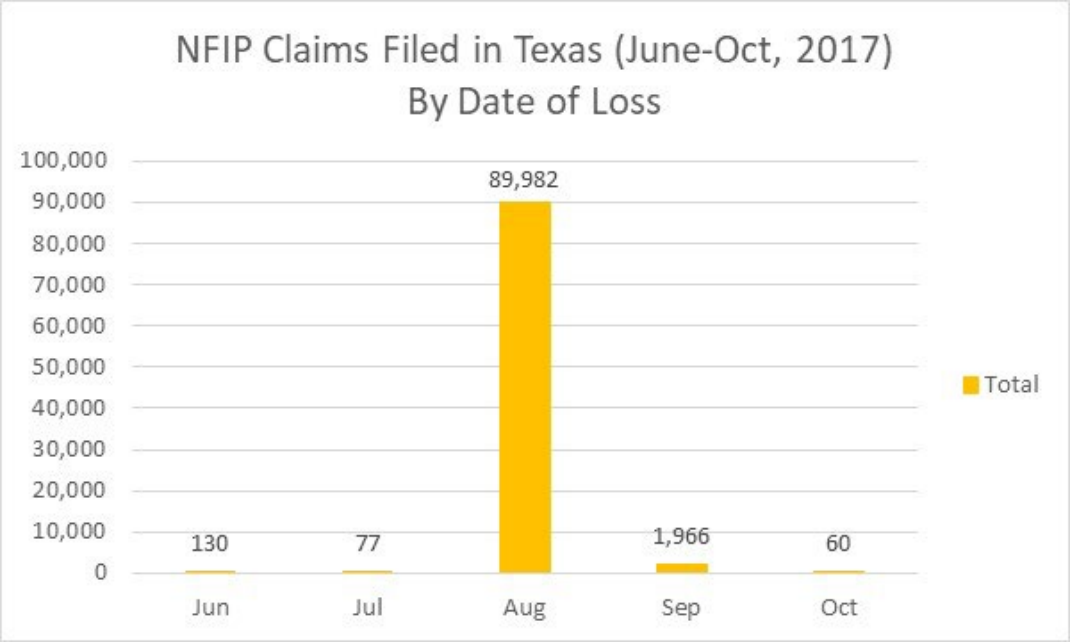


Figure 16: NFIP Claims Filed in Texas (June-Oct, 2017) By Date of Loss (as of July 31, 2018) (Updated in APA 2)

[22] FEMA. "The National Flood Insurance Program." Webpage accessed January 10, 2018. https://www.fema.gov/national-flood-insurance-program

[23] FEMA. "NFIP Summary of Coverage." Webpage/PDF accessed January 10, 2018. https://www.fema.gov /media-library-data /20130726-1620-20490-4648/f_679_summaryofcoverage_11_2012.pdf

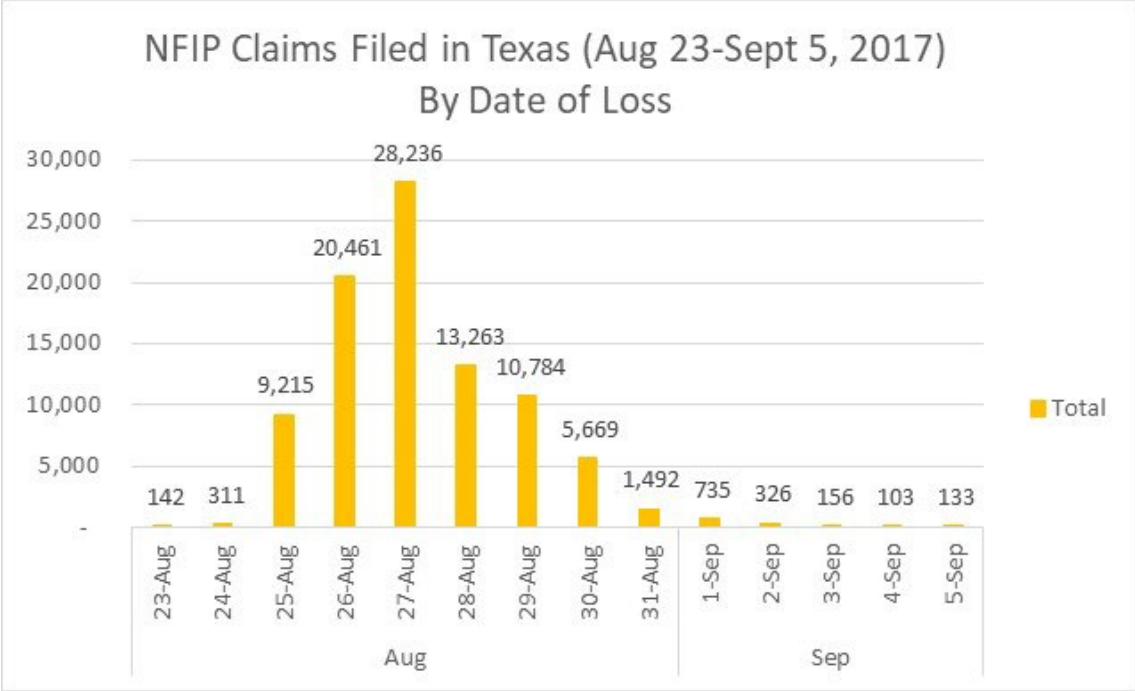


Figure 17: NFIP Claims Filed in Texas (Aug 23-Sept 5, 2017) By Date of Loss (Updated in APA 2)

As the claims are broken down into geographic areas, it is even more evident that the claims are Hurricane Harvey-related, as the biggest number of claims are coming from areas that are included in the 49 eligible counties, with the largest number of claims coming from the Houston area.

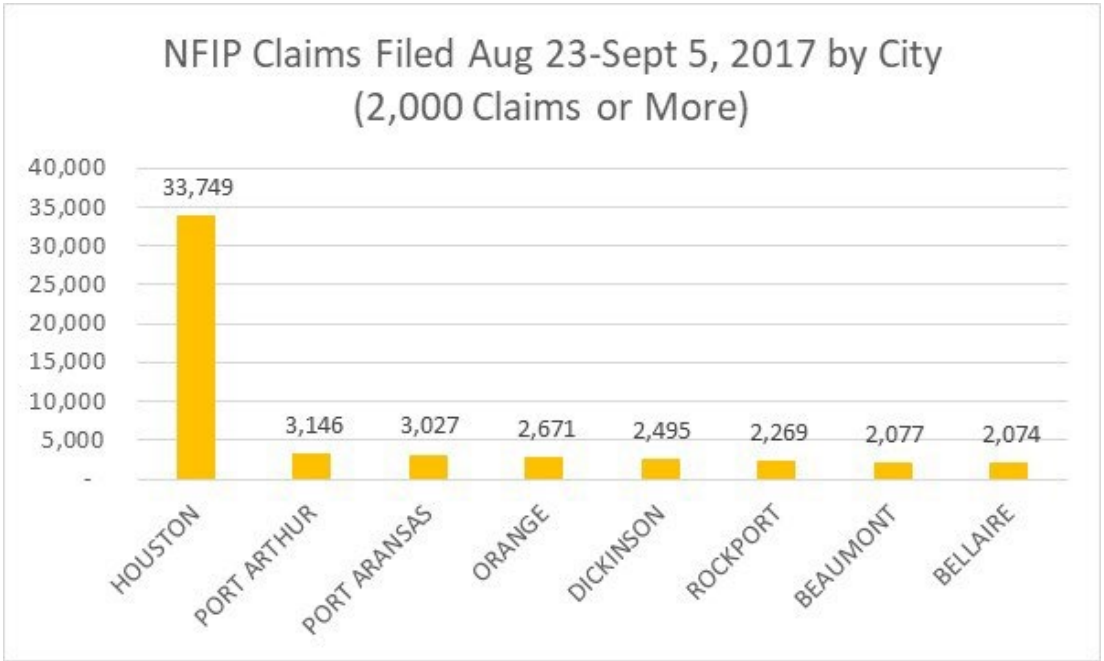


Figure 18: NFIP Claims Filed Aug 23-Sept 5, 2017 by City (2,000 Claims or More) (Updated in APA 2)

The NFIP data identifies insurance claims that fall into the Repetitive Loss (RL) category. An RL property is any insurable building for which two or more claims of more than $1,000 were paid. There are over 120,000 RL properties nationwide, with Texas having more than 27,000. These RL structures strain the NFIP fund, and currently are the biggest draw on the fund. They not only increase the NFIP's annual losses (increasing the need for borrowing), but drain fund reserves needed to address future catastrophic events. [24]

Based on the most recent NFIP data provided to the GLO, Hurricane Harvey resulted in approximately 13,826 NFIP claims designated as RL as of July 31, 2018. The vast majority of these claims—9,050 or 65 percent—were made in Harris County. The following graph highlights the counties with the largest numbers of RL properties that were reported during this period (accounting for 96 percent of RL properties).

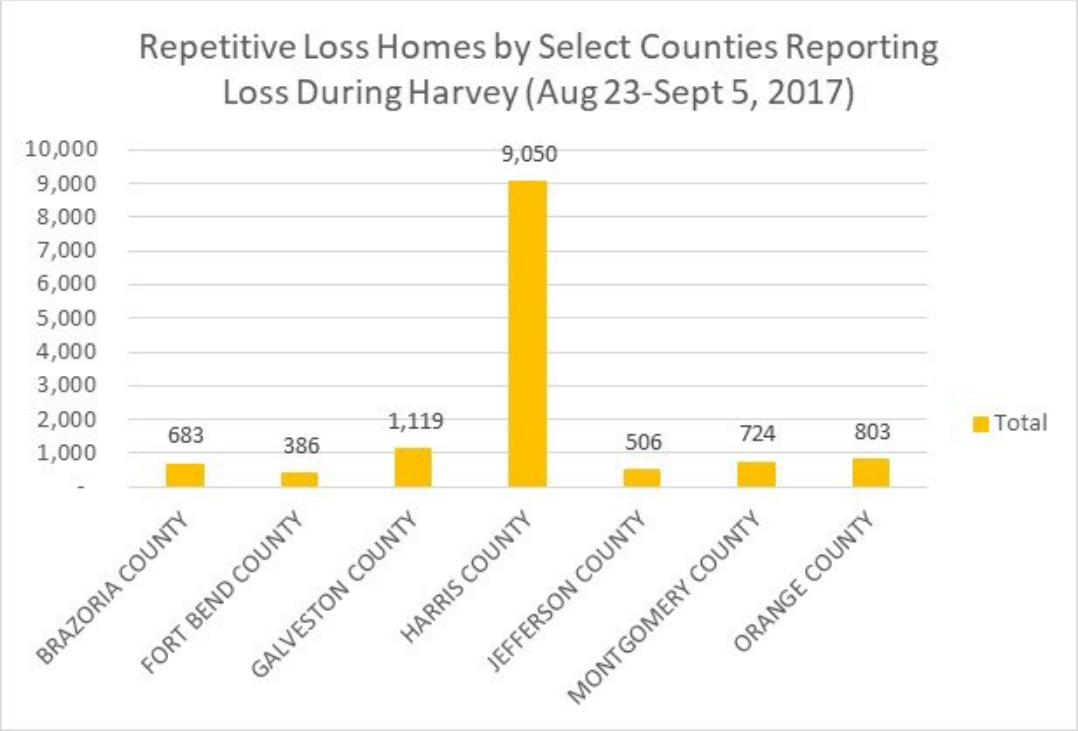


Figure 19: NFIP RL Homes by Select Counties Reporting Loss During Harvey (Updated in APA 2)

Additionally, the following map shows the concentration of RL properties with Hurricane Harvey claims by ZIP code. While there may be a correlation between ZIP codes and those RL properties along rivers such as the Guadalupe River, there is a high concentration of RL properties located throughout Harris County.

[24] FEMA. "Repetitive Loss FAQ." Webpage/Text accessed January 10, 2018. https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt

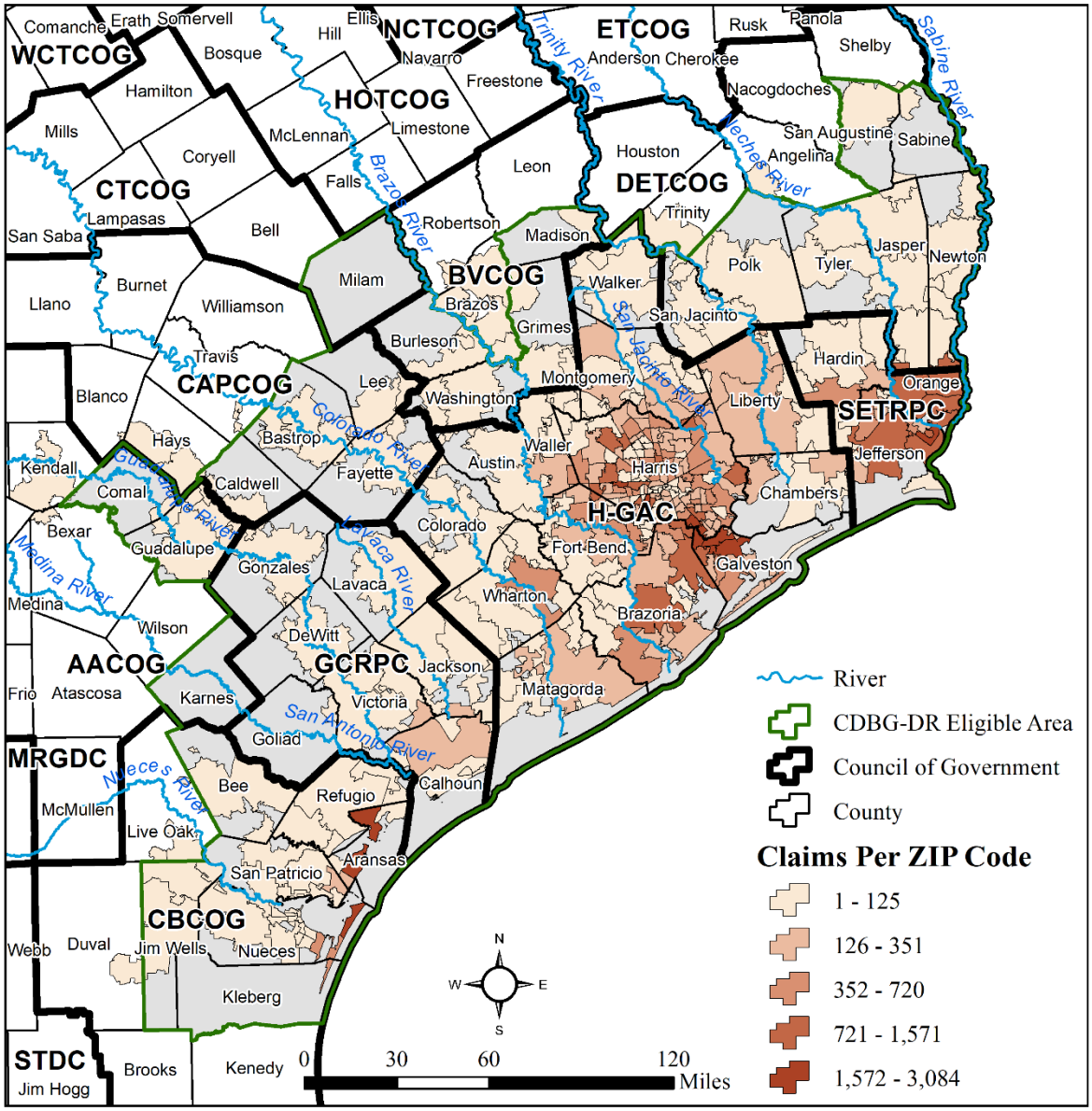


Figure 20: NFIP RL Claims by ZIP Code (August 23 – September 5, 2017) (Updated in APA 2)

7. Texas Windstorm Insurance Association

The Texas Windstorm Insurance Association (TWIA)[25] was established by the Texas Legislature in 1971 in response to regional market conditions following Hurricane Celia in August 1970. TWIA's purpose is to provide windstorm and hail insurance for the Texas seacoast.

TWIA is the insurer of last resort and is not a direct competitor of the voluntary insurance market. It provides coverage to residential and commercial properties in certain designated

[25] https://www.twia.org/

portions of the Texas seacoast territory. The designated catastrophe area is that portion of the seacoast territory where the Commissioner of Insurance has found that windstorm and hail insurance is not reasonably available.

The number of TWIA claims filed for Hurricane Harvey as of January 23, 2018 totaled 74,266, with the highest number of claims, 24,967 or 34 percent, made in Nueces County. The map below identifies the TWIA eligible counties along the Texas Gulf Coast within in the impacted area and the number of claims within each TWIA eligible county. It should be noted that only a small portion of Harris County is eligible for TWIA coverage. Total indemnity payments, which are the losses paid or expected to be paid directly to an insured for first-party coverages, totaled over $958 million. Paid expenses, which are expenses of adjusting claims that cannot be charged against specific claims, totaled over $101 million. The highest total average paid for claims is found in Aransas County with an average of $68,149 per claim. The lowest average paid for claims was in Kleberg County with an average of $3,938 per claim. Kleberg County also demonstrated the lowest number of new claims with 38.

Table 8: TWIA Claims by County (as of January 23, 2018)

County	New Claims	Closed Claims	Open Inventory	% Closed	Paid Indemnity	Paid Expense	Average Paid
Aransas	7,078	5,623	1,455	79.4%	$411,754,777	$17,477,609	$68,149
Brazoria	4,035	3,911	124	96.9%	$10,328,579	$4,375,109	$6,484
Calhoun	2,553	2,391	162	93.7%	$24,066,466	$3,848,723	$11,908
Cameron*	40	36	4	90.0%	$872,656	$132,926	$58,177
Chambers	1,002	975	27	97.3%	$3,442,032	$1,121,065	$7,931
Galveston	11,025	10,608	417	96.2%	$34,920,052	$13,338,808	$7,474
Harris	593	565	28	95.3%	$3,046,684	$744,287	$9,260
Jefferson	9,893	9,511	382	96.1%	$29,189,030	$10,494,094	$6,197
Kleberg	38	38	-	100.0%	$102,390	$36,200	$3,938
Matagorda	869	851	18	97.9%	$3,743,109	$996,054	$6,830
Nueces	24,967	23,418	1,549	93.8%	$327,009,711	$36,483,090	$16,247
Refugio	414	349	65	84.3%	$15,996,605	$904,222	$45,705
San Patricio	6,710	6,188	522	92.2%	$94,316,008	$11,590,970	$16,924
No Policy & Unverified	5,049	5,040	9	99.8%	$0	$0	$0
Grand Total	74,266	69,504	4,762	93.6%	$958,788,099	$101,543,157	$17,994

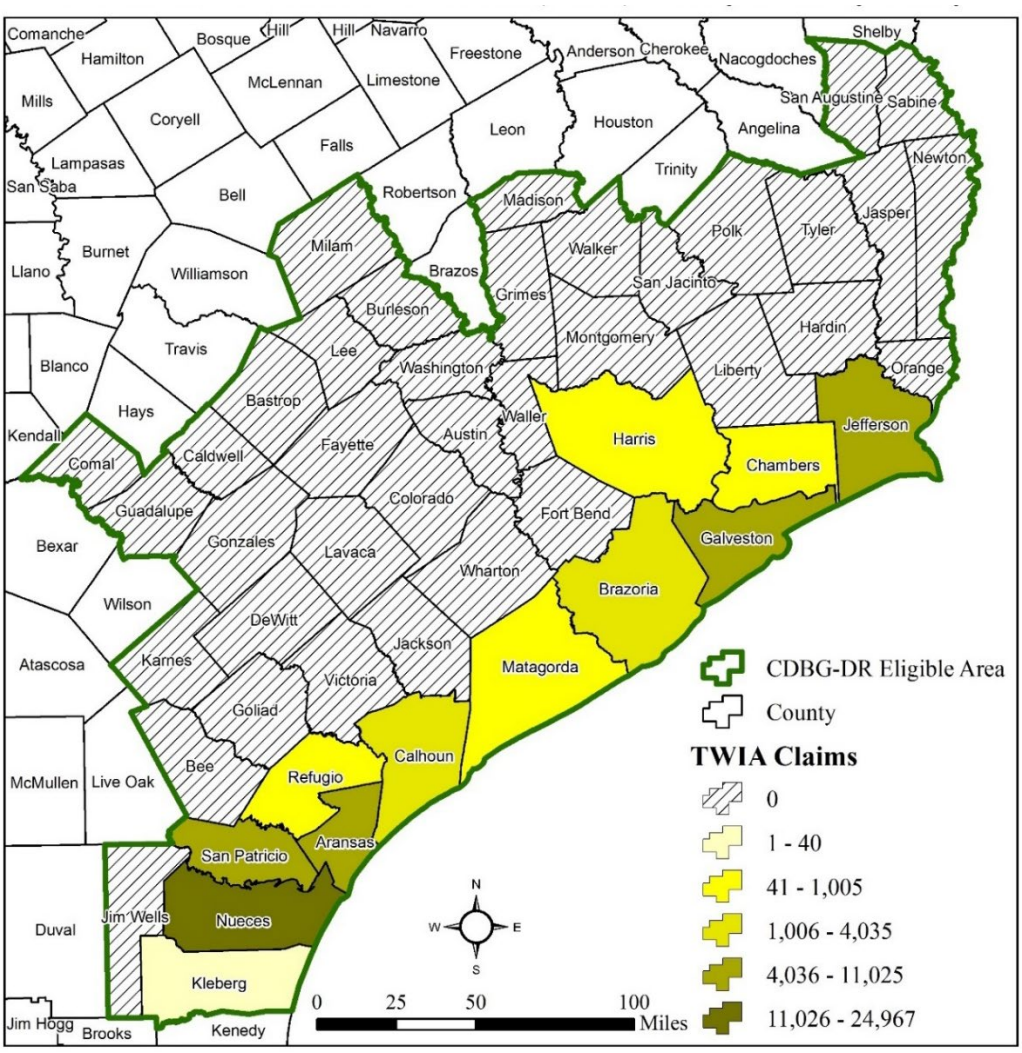


Figure 21: TWIA Harvey Claims by County (as of January 23, 2018).

8. Small Business Assistance Disaster Home Loans

Another resource for homeowners that sustained damage from Hurricane Harvey is SBA disaster loans. These loans are the basic form of federal disaster assistance for homeowners whose private property sustained damage that is not fully covered by insurance. Homeowners and renters whose property was damaged by a declared disaster can apply for an SBA low-interest loan. Interest rates on these loans are determined by law and are assigned on a case by case basis.

Specific to Hurricane Harvey assistance, interest rates are 1.75 percent if the applicant does not have credit available elsewhere and 3.5 percent if credit is available elsewhere. The home loans are limited to $200,000 for the repair or replacement of real estate and $40,000 maximum to repair or replace personal property. [26]

[26] U.S. Small Business Administration Fact Sheet. November 7, 2017. "Disaster Loans, Texas Declaration #15274 and #15275." https://smallbusiness.house.gov/uploadedfiles/attachment_1.pdf

As of August 28, 2018, over $2.9 billion in home loans have been approved by the SBA. A breakdown of the approved loans is categorized by county and COG in the table below.

Table 9: Total Home Loans Approved by SBA

County	COG	Total Home Loans
KARNES	AACOG	$ 297,000
Total AACOG		**$ 297,000**
GRIMES	BVCOG	$ 134,100
Total BVCOG		**$ 134,100**
BASTROP	CAPCOG	$ 1,105,500
CALDWELL	CAPCOG	$ 581,600
FAYETTE	CAPCOG	$ 4,180,600
LEE	CAPCOG	$ 135,500
Total CAPCOG		**$ 6,003,200**
ARANSAS	CBCOG	$ 73,380,300
BEE	CBCOG	$ 1,866,000
KLEBERG	CBCOG	$ 259,200
NUECES	CBCOG	$ 69,292,700
REFUGIO	CBCOG	$ 10,537,300
SAN PATRICIO	CBCOG	$ 37,380,900
Total CBCOG		**$ 192,716,400**
JASPER	DETCOG	$ 4,339,600
NEWTON	DETCOG	$ 6,527,200
POLK	DETCOG	$ 1,709,500
SABINE	DETCOG	$ 36,300
SAN JACINTO	DETCOG	$ 3,102,100
TYLER	DETCOG	$ 2,047,800
Total DETCOG		**$ 17,762,500**
CALHOUN	GCRPC	$ 9,663,300
DEWITT	GCRPC	$ 1,520,400
GOLIAD	GCRPC	$ 2,115,400
GONZALES	GCRPC	$ 319,700
JACKSON	GCRPC	$ 1,303,000
LAVACA	GCRPC	$ 767,000
VICTORIA	GCRPC	$ 24,653,100
Total GCRPC		**$ 40,341,900**
AUSTIN	H-GAC	$ 1,376,300
BRAZORIA	H-GAC	$ 127,415,700
CHAMBERS	H-GAC	$ 52,825,900
COLORADO	H-GAC	$ 962,700
FORT BEND	H-GAC	$ 288,298,400
GALVESTON	H-GAC	$ 233,625,600

County	COG	Total Home Loans
HARRIS	H-GAC	$ 1,237,462,400
LIBERTY	H-GAC	$ 28,496,500
MATAGORDA	H-GAC	$ 6,294,900
MONTGOMERY	H-GAC	$ 58,620,000
WALKER	H-GAC	$ 1,021,200
WALLER	H-GAC	$ 5,713,000
WHARTON	H-GAC	$ 18,732,200
Total H-GAC		**$ 2,060,844,800**
HARDIN	SETRPC	$ 104,323,400
JEFFERSON	SETRPC	$ 268,239,700
ORANGE	SETRPC	$ 262,425,100
Total SETRPC		**$ 634,988,200**
GRAND TOTAL		**$ 2,953,088,100**

9. Public Housing Authority Data

The impact on public housing authority units, Section 8, and Housing Choice Vouchers was provided to the GLO by the HUD. In November 2017, HUD collected preliminary damage estimates and the number of units impacted. The CBCOG, H-GAC, and SETRPC had the highest number of public housing units impacted.

Table 10: Total Impacted Units and Damage Estimates

COG	Section 8 or Housing Choice Vouchers - Impacted	Public Housing Units Impacted	Total Impacted Units	Current Displaced (# of Household for PIH/MF)	PHA Damage Estimate
AACOG	0	46	46	**0**	$6,080
BVCOG	0	0	0	**0**	-
CAPCOG	0	8	8	**0**	$71,413
CBCOG	97	313	410	**179**	$8,663,600
DETCOG	2	19	21	**2**	$146,755
GCRPC	16	120	136	**17**	$1,347,300
H-GAC	345	234	579	**399**	$12,431,369
SETRPC	365	323	688	**387**	$2,924,300
Statewide	48	0	48	**48**	-
Grand Total	**873**	**1,063**	**1,936**		**$25,590,817**

Public housing authorities are eligible for FEMA PA. As of June 8, 2018, the following table shows the FEMA PA projected costs provided by FEMA and unmet need for public housing authorities by COG region. Due to the 90 percent federal cost share tied to the approximate

cost amount, the total PA unmet need will be calculated from the remaining 10 percent of the projected cost amount plus 15 percent of the approximate cost as a resiliency multiplier.

Estimates for permanent work will continue to be forthcoming over the next several months, as shown between the damages estimated that HUD collected in November and the projected costs that the public housing authorities have submitted to the FEMA PA program.

Table 11: Public Housing Authorities FEMA PA Projected Cost and Unmet Need by COG Region

COG	Projected Cost	Unmet Need
CBCOG	$1,510,995	$377,749
GCRPC	$480,802	$120,201
H-GAC	$49,311,183	$12,327,796
SETRPC	$19,156,868	$4,789,217
Grand Total	**$70,459,848**	**$17,614,962**

The Harris County Housing Authority (HCHA) and Houston Housing Authority (HHA) account for 70 percent of the public housing authorities' unmet needs.

10. FEMA Individual Assistance

The Individual Assistance (IA) data received from FEMA and dated as of June 25, 2018, was used to quantify all housing applicants impacted by Hurricane Harvey. This information was then used to calculate the unmet need by county and COG and divided into renter and owner subsets. More than 892,000 applications were received according to FEMA. Of that number, FEMA verified that over 291,000 applicants had a FEMA Verified Loss (FVL) over $0.

The total number of owner-occupied applicants in the eligible counties with over $8,000 in real property damage is 94,699. The total number of renter applicants in the eligible counties with over $2,000 in personal property damage is 37,746.

Using the above thresholds to calculate unmet need, 94,699 (71.5 percent) of the 132,458 applicants are owner-occupied homes, while 37,746 (28.5 percent) are renters.

Table 12: Total IA Applications

Occupancy Type	Total Applications	FVL Over $0	Applicants with Unmet Need
Owner	444,180	211,423	94,699
Renter	443,741	80,271	37,746
Not Specified	4,342	115	13
Totals	**892,263**	**291,809**	**132,458**

a. Total Unmet Needs

The GLO has compiled information from FEMA for individual assistance in order to document estimated repair costs and unmet housing needs by eligible county. The population structure used includes owner-occupied households and renter households. For the purpose of this analysis, the GLO is utilizing certain components of HUD's methodology for unmet need for both types of households.

Owner-occupied Homes

To calculate the level of real property damage for owner-occupied homes, the following criteria was used:

- **Major-Low:** $8,000 to $14,999 of FEMA verified loss.
- **Major-High:** $15,000 to $28,800 of FEMA verified loss.
- **Severe:** Greater than $28,800 of FEMA verified loss.

Renter-occupied Homes

To calculate the level of personal property damage for renters, the following criteria was used:

- **Major-Low:** $2,000 to $3,499 of FEMA verified loss.
- **Major-High:** $3,500 to $7,499 of FEMA verified loss.
- **Severe:** Greater than $7,500 of FEMA verified loss.

To calculate estimated unmet need, the GLO used multipliers provided by HUD. These multipliers are based on the SBA median repair cost for the specific disaster category less the weighted average of expected SBA and FEMA repair costs. Based on FEMA IA data provided to the GLO, the estimated weighted average of expected SBA and FEMA total repair costs for each category is represented in the following table.

Table 13: Unmet Need Multiplier by Damage Category

Category	Multiplier Amount
Major-Low	$56,342
Major-High	$75,414
Severe	$101,390

The following table provides a breakdown of total unmet needs for owner- and renter-occupied households. It provides the damage category and the total count and unmet need for those three categories as previously defined.

Table 14: Category of Unmet Needs by Owner-Occupied and Renters

Damage Category/ Multiplier	Total Count	Total Owner-Occupied and Rental Unmet Needs	Owner-Occupied Count	Total Owner-Occupied Unmet Needs	Rental Count	Total Rental Unmet Needs
Major-Low: $56,342	**46,941**	**$2,644,749,822**	33,657	$1,896,302,694	13,284	$748,447,128

Damage Category/ Multiplier	Total Count	Total Owner-Occupied and Rental Unmet Needs	Owner-Occupied Count	Total Owner-Occupied Unmet Needs	Rental Count	Total Rental Unmet Needs
Major-High: $75,414	**63,191**	**$4,765,486,074**	43,374	$3,271,006,836	19,817	$1,494,479,238
Severe: $101,390	**22,313**	**$2,262,315,070**	17,668	$1,791,358,520	4,645	$470,956,550
Total	**132,445**	**$9,672,550,966**	94,699	$6,958,668,050	37,746	$2,713,882,916

As defined by the table, the owner-occupied unmet need in dollars is $6.95 billion (72 percent) and the renter unmet need is $2.71 billion (28 percent), resulting in a total unmet need of $9.67 billion. A breakdown of total unmet need by total cost per county is represented in the following map.

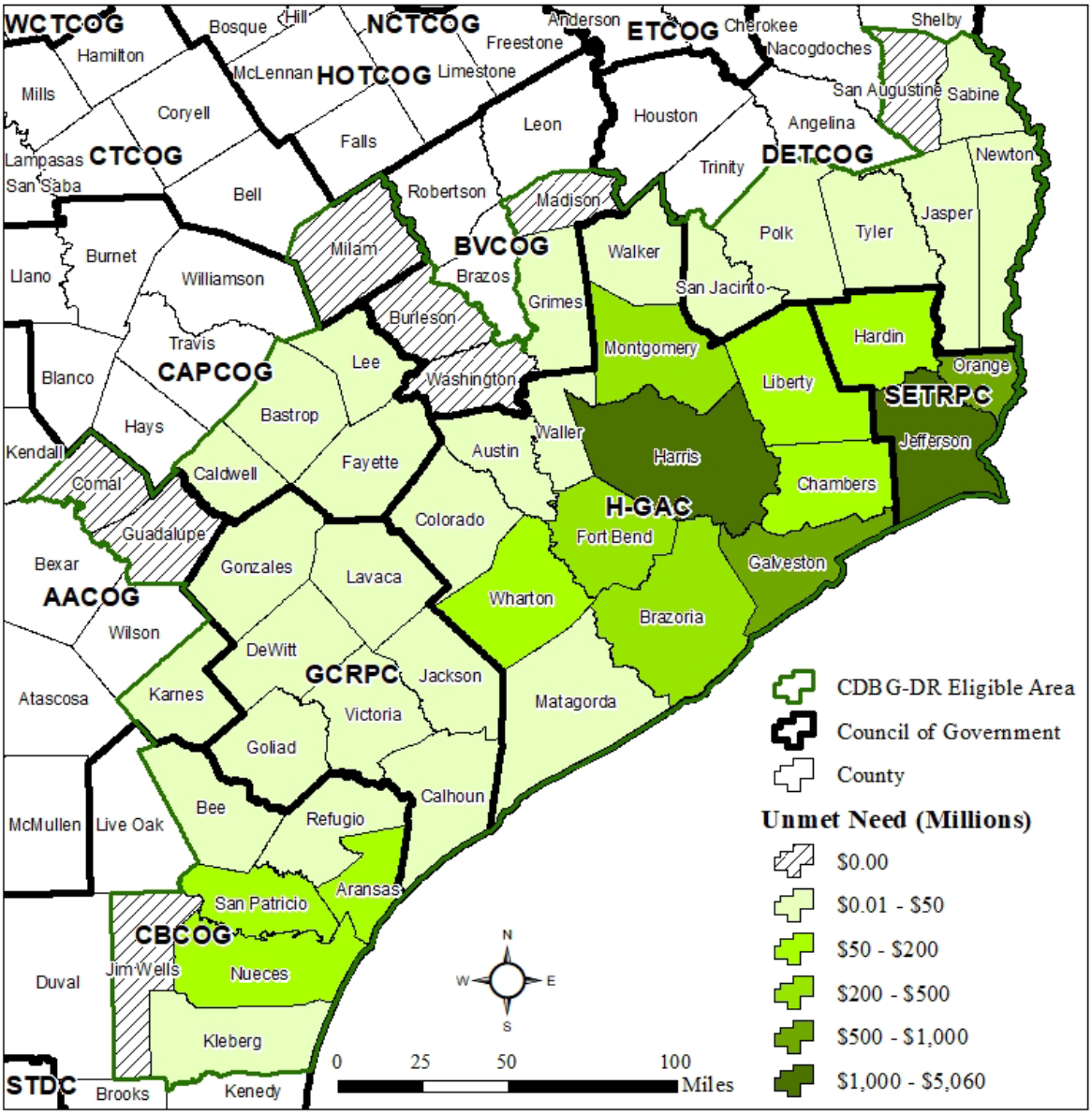


Figure 22: Total Housing Unmet Need by County (Updated in APA 2)

HUD requirements for this CDBG-DR allocation specify that the GLO must expend a minimum of 70 percent to benefit LMI populations. The GLO used self-reported applicant information provided by FEMA to calculate what percentage of the population in the eligible counties falls into certain income categories. Approximately 46 percent of the unmet need population is below 80 percent in the LMI category. The unmet need for the LMI population is almost $4.47 billion. The unmet need by income category for all eligible counties can be seen in the following table.

Table 15: Unmet Need by Income Category/Owner-Occupied and Renter

Income Category	Count	Unmet Need	% of Count	% of Unmet Need
0-30%	27,994	$1,996,098,916	21.1%	20.6%
31-50%	13,661	$970,608,230	10.3%	10%
51-80%	20,390	$1,469,624,252	15.4%	15.2%
81%-120%	31,004	$2,292,637,312	23.4%	23.7%
Over 120%	22,929	1,728,796,878	17.3%	17.9%
Not Reported	16,480	$1,215,646,064	12.4%	12.6%
Total	132,458	$9,673,411,652	100%	100%

The below map provides an additional layer when looking at a community's ability to recover following a disaster. This is the consideration of unmet need per capita for total owner-occupied and renter households. The amount of unmet need per capita is an important factor when considering the ability for a community to recover. Unmet need per capita allows for a more accurate depiction of impacts to rural counties, who may not have the resources available to recover on their own. In the case of Hurricane Harvey, the ranges for housing per capita unmet need for the most impacted counties ranges from $182 (Nueces) to $8,195 (Orange).

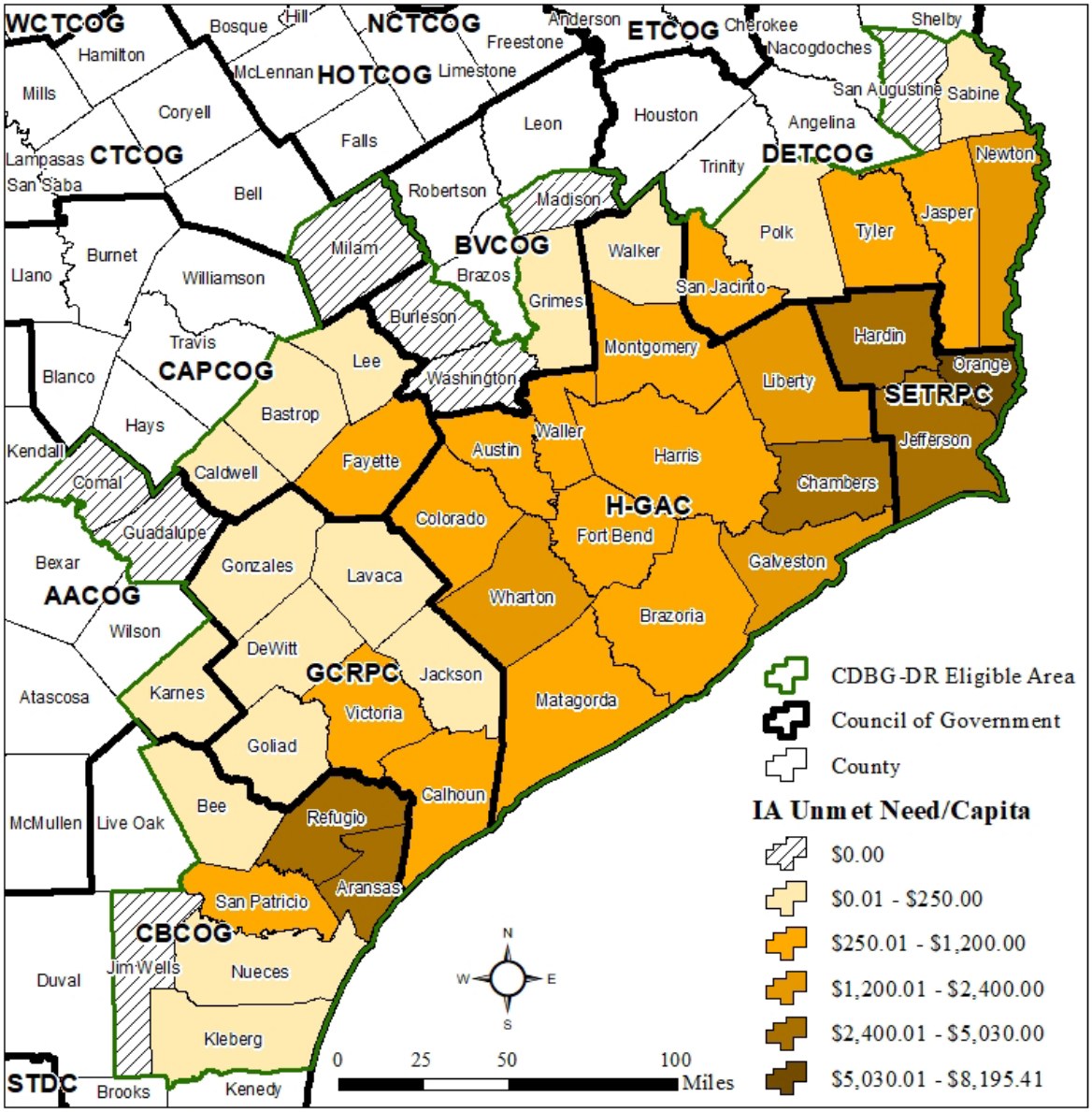


Figure 23: Total Housing Unmet Need Per Capita (Updated in APA 2)

b. Owner-occupied Unmet Need

A breakdown of unmet need by total cost per county for owner-occupied homes is represented in the following map.

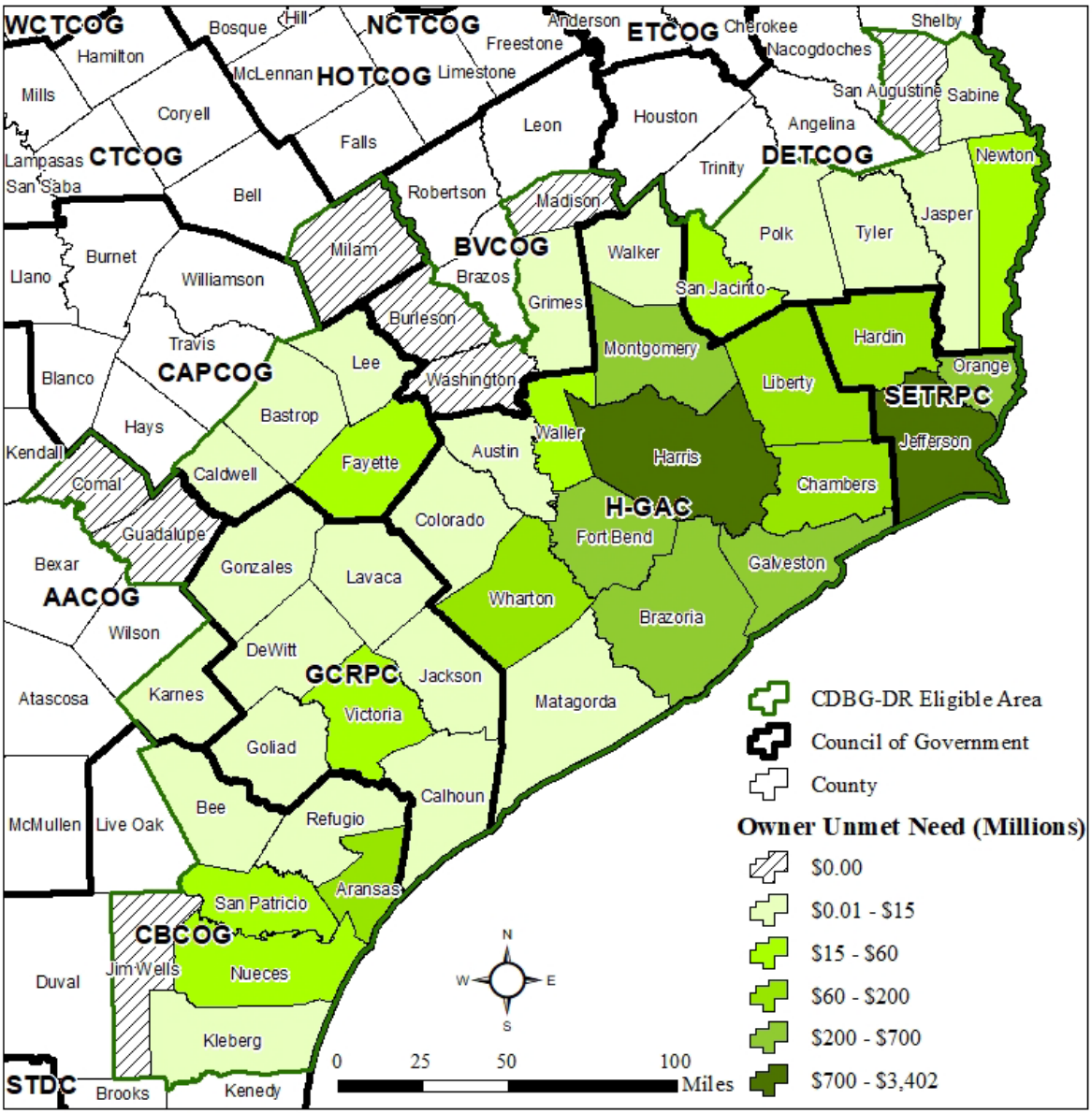


Figure 24: Owner-occupied Unmet Need by County (Updated in APA 2)

Approximately 39 percent of the owner-occupied unmet need is below 80 percent LMI category. The unmet need for the LMI population is almost $2.6 billion for owners. The unmet need by income category for owner-occupied households for all eligible counties can be seen in the following table. This data informed the GLO on the development of the Homeowner Assistance Program (HAP), Local Buyout and Acquisition Program, and the Homeowner Reimbursement Program.

Table 16: Owner Unmet Need by Income Category				
Owner Unmet Need by Income Category	**Count**	**Unmet Need**	**% of Count**	**Unmet Need %**
0-30%	13,877	$982,731,782	15%	14%
31-50%	8,419	$597,152,178	9%	9%
51-80%	14,145	$1,016,171,742	15%	15%
81-120%	25,947	$1,926,600,122	27%	28%
Over 120%	20,530	1,553,867,436	22%	22%
Not Reported	11,781	$882,144,790	12%	12%
Total	94,699	$6,958,668,050	100%	100%

c. Renter-occupied Unmet Need

A breakdown of unmet need per county by total cost for rental applicants is represented in the following map.

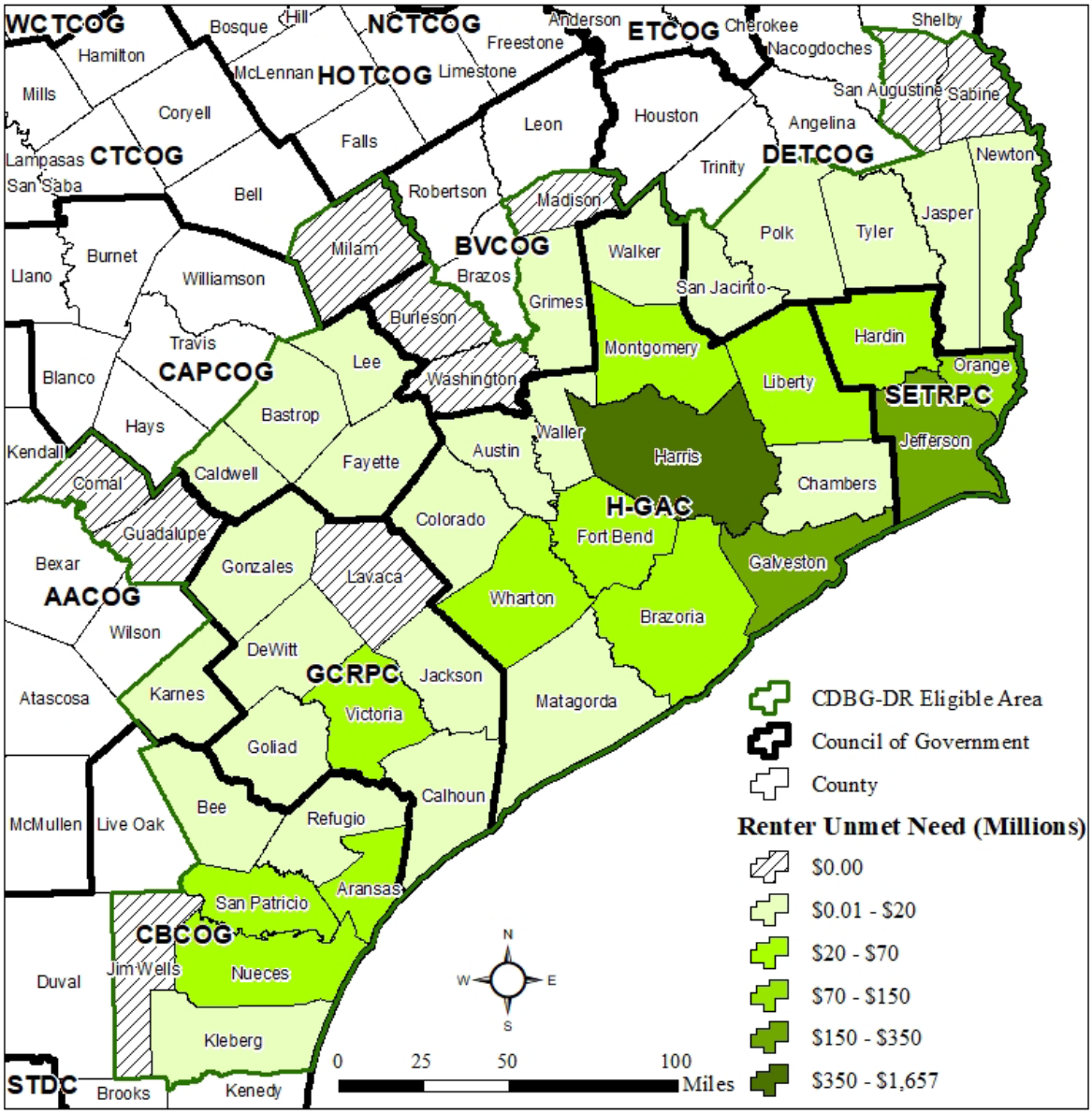


Figure 25: Renter Unmet Need by County (Updated in APA 2)

The GLO calculated the percentage of population of renter households within LMI categories. Approximately 68 percent of the unmet need is below the 80 percent LMI category. The unmet need for the LMI population is almost $1.84 billion for renters. The unmet need by income category for renters in all eligible counties can be seen in the following table. This information informed the Affordable Rental Program which was designed to provide funds for rehabilitation, reconstruction, and new construction of public housing and affordable multi-family housing projects in areas impacted by Hurricane Harvey.

Renters within Harris County and the city of Houston account for 61 percent of unmet need for renter households.

Table 17: Renter Unmet Need by Income Category

Income Category	Count	Unmet Need	% of Count	% of Unmet Need
0-30%	14,115	$1,013,254,450	37%	37%
31-50%	5,240	$373,343,368	14%	14%
51-80%	6,243	$453,320,754	17%	17%
81-120%	5,055	$365,905,434	13%	13%
Over 120%	2,398	$174,8783,100	6%	6
Not Reported	4,695	$333,185,810	12%	12%
Total	37,746	$2,713,882,916	100%	100%

d. Owners in a Floodplain with No Flood Insurance

The number of IA FEMA applicants that show an unmet need totals 132,458. The total number of owners that are in a floodplain with no flood insurance totals 13,244 (10 percent). The total number of those that are not LMI is 3,949 (30 percent) with the total being 7,504 (57 percent) that are in an LMI category.

As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, grantees are prohibited from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if the combined households income is greater than 120 percent Area Median Income (AMI) or the national median, the property was located in a floodplain at the time of the disaster, and the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

The table below provides a breakdown of owners in a floodplain with no flood insurance by income category so that these determinations can begin to be made.

Table 18: Owners with Unmet Need in a Floodplain with No Flood Insurance by Income Category

Income Category	Count	% of Count
0-30%	3,280	25%
31-50%	1,806	14%
51-80%	2,418	18%
81-120%	2,628	20%
Over 120%	1,323	10%
Not Reported	1,788	14%
Total	13,243	100%

H. Infrastructure Impact

Texas infrastructure all along the Gulf Coast was affected by Hurricane Harvey. This event caused damage to roadways, bridges, sections of the coastline, and many other infrastructure systems still being determined.

1. Governor's Commission to Rebuild Texas

Governor Greg Abbott established the Governor's Commission to Rebuild Texas (the Commission) in the immediate aftermath of Hurricane Harvey for the swift and effective restoration of damaged public infrastructure throughout disaster impacted areas. As stated in the Governor's Proclamation on September 7, 2017, for the establishment of the Commission, the effective restoration of damaged public infrastructure throughout the disaster area is of paramount importance to the Texas economy and to the people of Texas who live and work in the communities affected by Hurricane Harvey. The Commission will assist local governmental entities and nonprofit organizations to assess and identify rebuilding needs and to navigate state and federal resources available for the rebuilding effort. The Commission will advocate for the interests of state and local governments on matters related to disaster response and provide expertise and assistance to local governmental entities and nonprofit organizations throughout the rebuilding process. [27]

Source: HOU District Twitter feed – Aug 28, 2017 (https://twitter.com/TxDOTHoustonPIO)

The "October 31, 2017, Request for Federal Assistance Critical Infrastructure Projects" reported $61 billion in projects identified at state and local levels. This amount does not include current FEMA expenditures or CDBG-DR housing allocations. The $61 billion was compiled based on information available in September and October from impacted communities that identified and prioritized their needs. This amount is expected to increase as more information becomes available.

The types of identified projects include restoration and mitigation projects for roads, bridges, schools, government buildings, public facilities, as well as projects to protect coastal

[27] Rebuild Texas: The Governor's Commission to Rebuild Texas. "Proclamation." Webpage accessed January 10, 2018. https://www.rebuildtexas.today/proclamation/

infrastructure, homes, businesses, critical facilities, and national assets such as petrochemical complexes. Over 60 percent of the projects identified were for flood control projects. [28]

2. Texas Coastal Resiliency Study

With previous CDBG-DR funds, the GLO commissioned a Texas Coastal Resiliency Study to identify critical infrastructure within a coastal multi-county project study area that would be most vulnerable to future storm events. During this study, sites considered to be at risk were identified and new projects were proposed to mitigate potential damage to vulnerable infrastructure. As expected, many of these sites were impacted by Hurricane Harvey, but to what degree is still being determined. The improvements identified in this study should provide practical solutions that communities can quickly utilize for repairs and mitigation. This study identified 2,256 projects in the coastal region. [29]

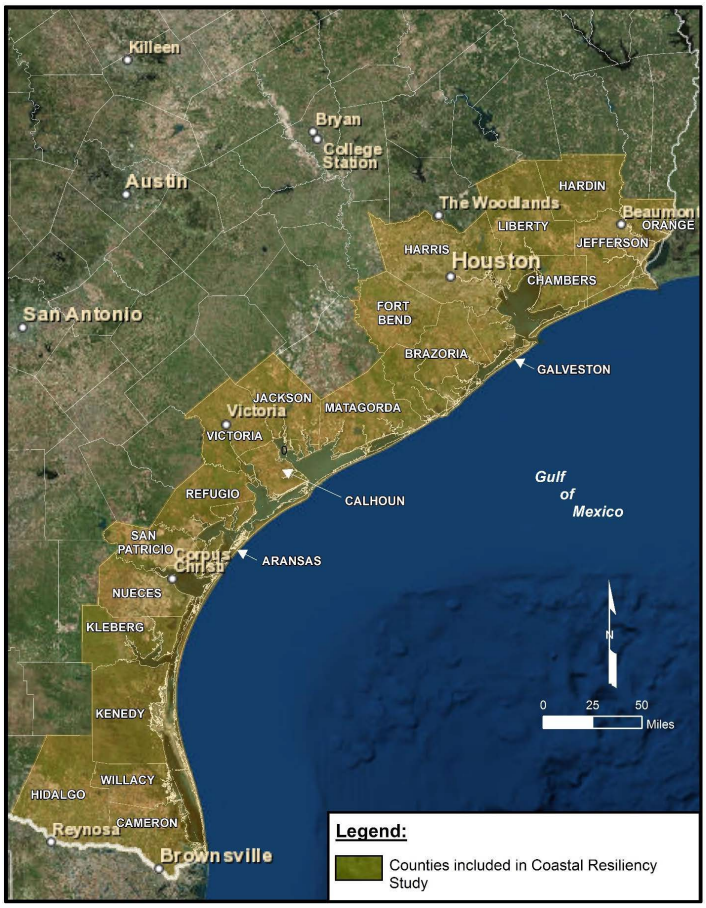


Figure 26: Texas Coastal Resiliency Study Area

[28] Ibid. "Request for Federal Assistance Critical Infrastructure Projects." Webpage/PDF accessed January 10, 2018. https://www.documentcloud.org/documents/4164748-Rebuild-Texas-REQUEST-FOR-FEDERAL-ASSISTANCE.html

[29] The Texas General Land Office. "Texas Coastal Resiliency Study, Final Report." Webpage/PDF accessed January 10, 2018. http://www.glo.texas.gov/coastal-grants/_documents/grant-project/texas-coastal-resiliency-study.pdf

The Texas GLO is also responsible for all 367 miles of Texas beaches. In 2015, the GLO started the Hurricane Preparedness and Planning initiative to pool local, state, and federal resources to begin prioritizing efforts to build a resilient Texas coast. This initiative includes a number of coast-wide studies such as: the Texas Coastal Resiliency Master Plan, Coastal Texas Protection and Restoration Feasibility Study, the Storm Surge Suppression Study and the Texas Regional Sediment Study.

3. FEMA Public Assistance

Due to the vast size of the impact area and different types of recovery that will be necessary, the FEMA PA data is the best available data set to determine infrastructure need and also serves as a statewide metric to begin the discussion on specific infrastructure needs. Each eligible entity is at various stages of submitting their project worksheets and estimates for permanent work will continue to be forthcoming over the next several months. For this Action Plan, given the limited availability of data, housing unmet needs have been prioritized.

Due to the 90 percent federal cost share tied to the approximate cost amount, the total PA infrastructure unmet need for these localities was calculated from the remaining 10 percent of the projected cost amount plus 15 percent of the approximate cost as a resiliency multiplier. The PA data received from FEMA dated as of June 8, 2018 was used to calculate the unmet need. The below table provides a high-level approximation of total costs and total need for each PA category as of June 8, 2018. As illustrated, the categories with the highest total need are Roads and Bridges and Utilities with a total PA need of over $1.2 billion for the 49 counties.

Table 19: Total Cost and Need by PA Category

PA Category (49 Counties)	Approx. PA Cost	10% Local Match	15% Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)
A - Debris Removal	$405,998,547	$40,599,854	$60,899,782	$101,499,636
B - Emergency Protective Measures	$747,239,329	$74,723,932	$112,085,899	$186,809,832
C - Roads and Bridges	$2,241,433,550	$224,143,355	$336,215,032	$560,358,387
D - Water Control Facilities	$242,417,186	$24,241,718	$36,362,577	$60,604,296
E - Buildings and Equipment	$1,403,387,485	$140,338,748	$210,508,122	$350,846,871
F - Utilities	$2,694,094,073	$269,409,407	$404,114,110	$673,523,518
G - Parks, Recreational Facilities, and Other Items	$177,407,156	$17,740,715	$26,611,073	$44,351,789

PA Category (49 Counties)	Approx. PA Cost	10% Local Match	15% Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)
Z - Direct Administrative Costs	$46,763,729	$4,676,372	$7,014,559	$11,690,932
Grand Total	**$7,958,741,056**	**$795,874,105**	**$1,193,811,158**	**$1,989,685,263**

The below map gives a high-level snapshot of each county's preliminary PA need. Harris county demonstrates the highest need with a total of more than $1.5 billion dollars, or over 78 percent of the total need for all 49 counties. This can be attributed to a variety of factors including the significant impact to roads and bridges across Harris county, primarily in the City of Houston. Other counties with high PA needs are Jefferson ($99.8 million), Nueces ($48.9 million), Orange ($40.4 million), Galveston ($37.7 million), Fort Bend ($36.6 million), and Aransas ($30.7 million).

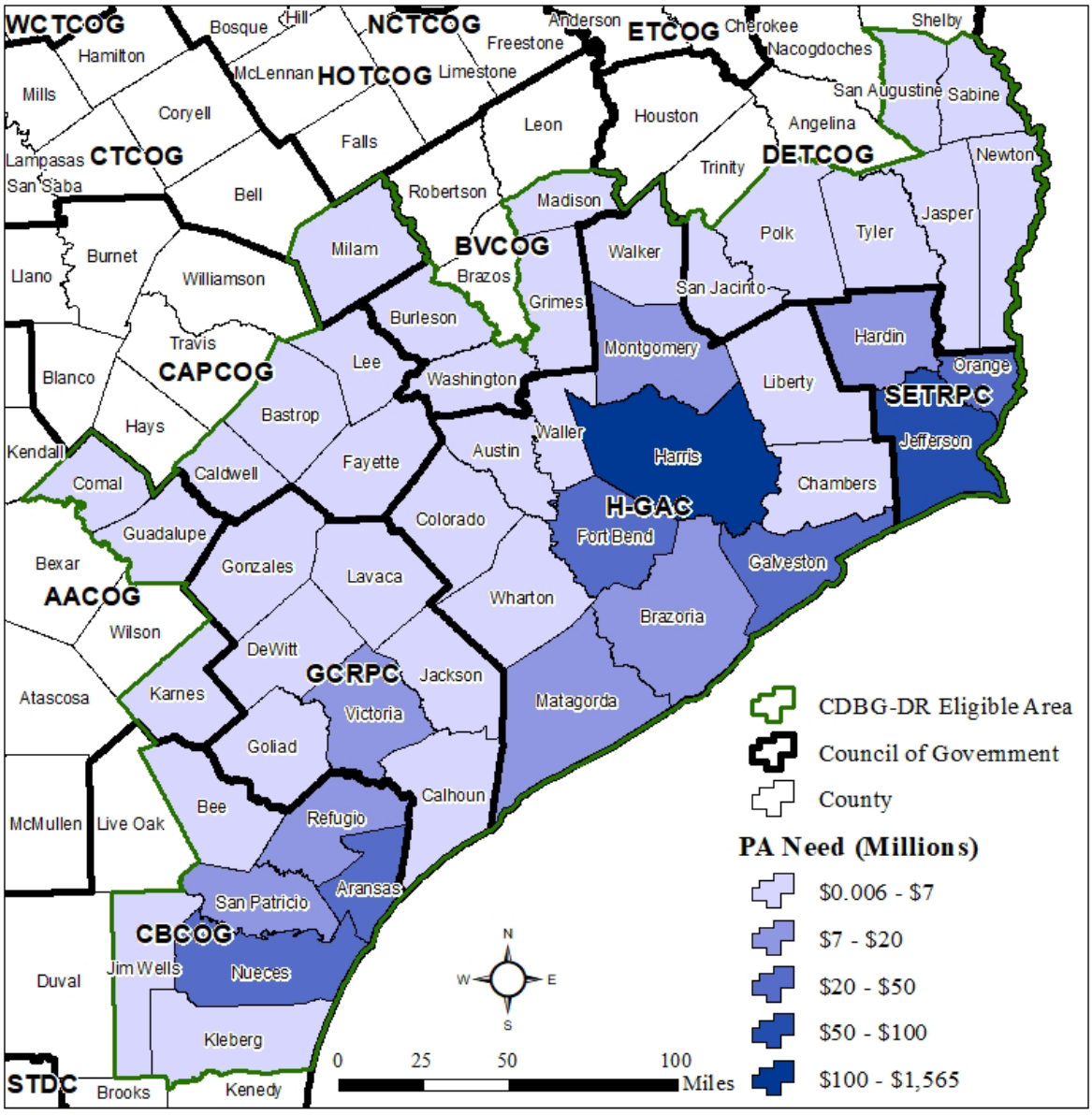


Figure 27: Total Public Assistance Need by County (Updated in APA 2)

As stated above in the IA section, need per capita is a good indicator when looking at a community's ability to pay for recovery. The below map indicates the three counties with the highest per capita PA need as Refugio ($2,001), Aransas ($1,193), Orange ($476), Jefferson ($392), and Harris ($341). The remaining counties show significantly less per capita PA needs starting at $314.

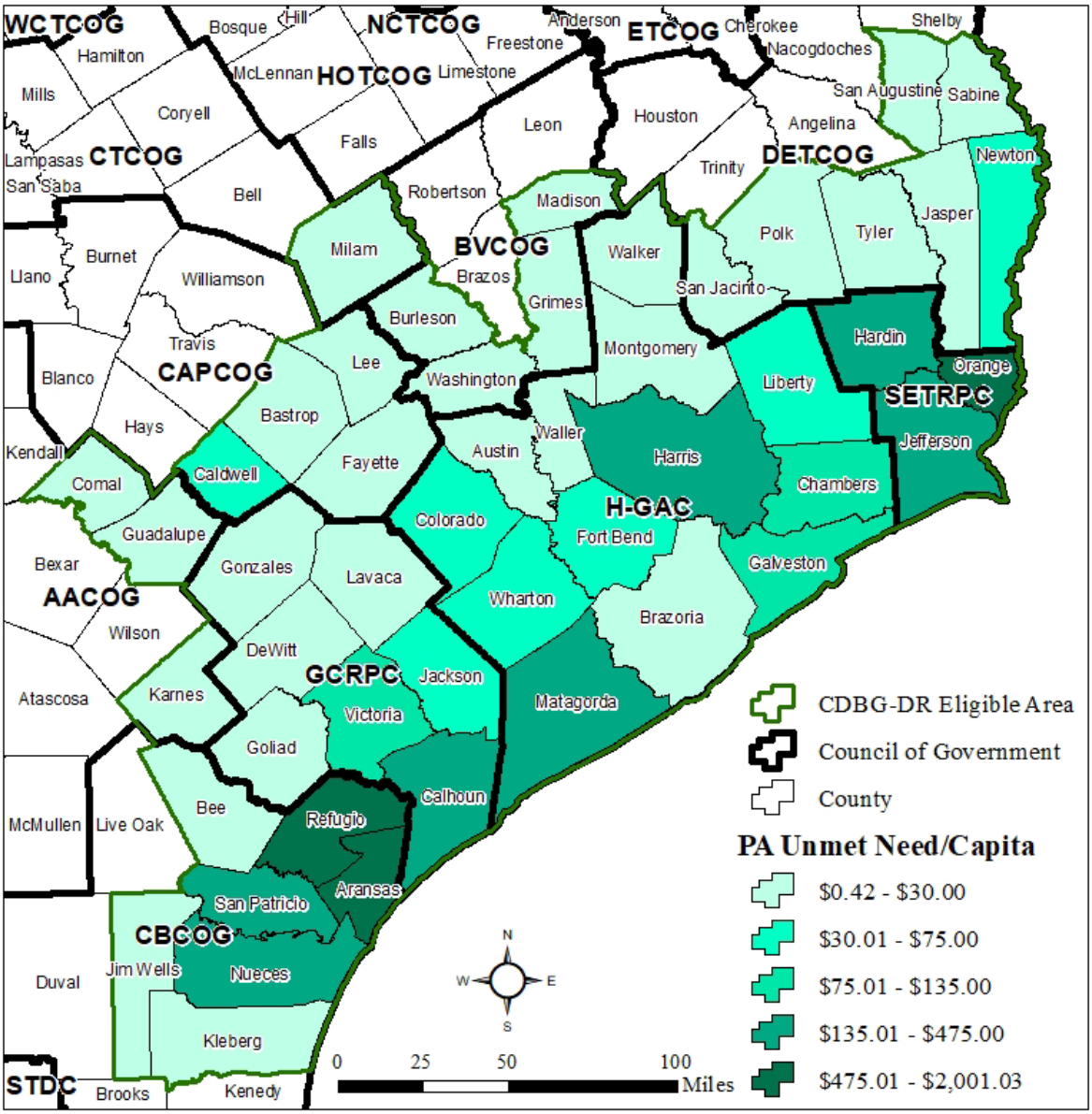


Figure 28: County Total PA Unmet Need Per Capita (Updated in APA 2)

Multiple agencies across the state of Texas also played a major role in recovery efforts associated with Hurricane Harvey. The GLO accumulated an approximate PA cost of $1.62 billion. The majority of this approximate cost ($1.62 billion) comes from the federal and state partnership on the emergency protective measure of the PREPS program. This program performs emergency work and power restoration in disaster-damaged single-family owner-occupied residences. PREPS provide temporary repairs and allows homeowners to remain in their homes and their communities as they complete permanent repairs on their homes.

Table 20: Approximate Harvey Recovery Costs by Agency

Agency	Approx. Cost
Lower Colorado River Authority (LCRA)	$16,622,853.00
Office of the Attorney General	$400,454.00
Texas A&M AgriLife Extension Service	$182,957.28
Texas A&M Engineering Extension Service	$4,317,594.53
Texas A&M Forest Service (TX A&M Forest Service)	$3,654,800.00
Texas A&M University – Corpus Christi	$982,562.65
Texas A&M University	$22,658.56
Texas A&M University (Veterinary Emergency Team)	$128,013.39
Texas A&M University at Galveston	$1,272,306.00
Texas Alcoholic Beverage Commission	$50,000.00
Texas Animal Health Commission	$330,352.15
Texas Commission on Environmental Quality	$1,027,280.00
Texas Department of Public Safety	$31,530,583.77
Texas Department of State Health Services	$31,095,657.07
TDEM	$401,383,689.48
Texas Health & Human Services Commission	$31,715,579.78
Texas Historical Commission	$3,311,061.00
Texas Parks and Wildlife Department	$16,522,556.01
The University of Texas at Austin	$37,990,080.00
The University of Texas Medical Branch	$6,374,022.01
The University of Texas Health Science Center at San Antonio	$71,829.00
Texas Department of Transportation	$100,729,204.07
Texas GLO	$1,622,999,772.09
Texas Military Department	$75,548,469.24
Texas Youth Commission (Texas Juvenile Justice Department)	$140,073.80
GRAND TOTAL	**$2,388,404,408.88**

Though impossible to determine at this time, future property valuations and the overall impact of Hurricane Harvey on property values should be taken into consideration for the long-term struggle that communities will face as they continue to recover using their own resources. While unmet housing needs will begin to be addressed, there still remains significant unmet need in infrastructure and other non-housing sectors, including future tax revenue loss due to Hurricane Harvey. Projects affiliated with economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas as well as ensure the ongoing viability of the impacted areas and beyond. The above data and factors led the state to develop the Local Infrastructure program, that as part of a comprehensive long-term recovery program, the repair and enhancements of local

infrastructure and mitigation efforts are crucial components of community recovery and support of housing.

I. Economic Impact

1. Employment

a. Statewide Statistics

As of August 2017, jobs had grown in the state from 12,035,300 to 12,328,400, according to figures published by the Texas Workforce Commission. That is a 2.4 percent year-over-year increase from August of 2016, a net increase of 293,100 new jobs. In addition, the statewide unemployment rate for August 2017 decreased to 4.5 percent from 4.9 percent in 2016. In a growing economy like Texas, long-term job growth and unemployment increases were impacted by Hurricane Harvey, but to what extent is impossible to determine. The July 2018 figures show an unemployment rate of 4.0 percent and an increase in employment numbers from 12,328,400 in August 2016 to 13,276,703 in July 2018. [30]

b. County Level

Of the 49 eligible counties, almost all follow the statewide trend. There were two counties that had higher unemployment rates following Hurricane Harvey according to the statistics provided on the Texas Workforce Commission website. The unemployment rate in Aransas County went up from 5.4 percent in August 2017 to 8.7 percent in October 2017 before returning to 5.5 percent in July 2018, and Refugio County's unemployment rate increased from 5.2 percent to 6.5 percent in the same time period before decreasing to 4.8 percent in July 2018. [31]

c. Disaster Unemployment Assistance

The Disaster Unemployment Assistance program, administered by FEMA and the Texas Workforce Commission, provides unemployment benefits for individuals who lost their jobs or are no longer working as a direct result of Hurricane Harvey. The application deadline for applications was November 13, 2017. Through this program, a total of 24,758 claims were received, and 12,997 people were approved for assistance totaling $11,201,909.

2. Small Business Administration Business Disaster Loans

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, non-profit organizations such

[30] Texas Workforce Commission, "Labor Market Information". Webpage and data accessed September 2018. https://tracer2.com/cgi/dataanalysis/?PAGEID=94

[31] Ibid.

as charities, churches, and private universities are also eligible. The law limits these business loans to $2,000,000, and the amount cannot exceed the verified uninsured disaster loss. [32]

Based on data provided by SBA as of August 28, 2018, the total verified loss for real estate totaled more than $5.34 billion dollars and the total verified loss of business content was more than $568.33 million. The total combined business verified loss of over $5.91 billion for Hurricane Harvey. The SBA has approved over $1.38 billion in business loans as of August 28, 2018. Given the amount of business and EIDL loans, the remaining amount of loss totals over $4.52 billion. This can be translated into a preliminary unmet need for businesses impacted by Hurricane Harvey. The breakdown of total loans by county and COG can be seen in the following table.

Given that the state must primarily consider and address its unmet housing recovery needs, and demonstrate how its economic revitalization activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas, the state has developed the Economic Revitalization Program. This program allocates $100 million in funds for economic revitalization.

Table 21: Total Business Loans Approved by the SBA

County	COG	Business/EIDL Loans
KARNES	AACOG	
Total AACOG		**$ 412,800**
BURLESON	BVCOG	$ 25,000
Total BVCOG		**$ 25,000**
BASTROP	CAPCOG	$ 20,000
FAYETTE	CAPCOG	$ 3,912,900
Total CAPCOG		**$ 3,932,900**
ARANSAS	CBCOG	$ 124,569,900
BEE	CBCOG	$ 2,771,300
KLEBERG	CBCOG	$ 58,700
NUECES	CBCOG	$ 58,302,700
REFUGIO	CBCOG	$ 3,604,600
SAN PATRICIO	CBCOG	$ 51,893,000
Total CBCOG		**$ 241,200,200**
NEWTON	DETCOG	$ 1,456,800
POLK	DETCOG	$ 695,000
JASPER	DETCOG	$ 511,100
SAN JACINTO	DETCOG	$ 405,900
Total DETCOG		**$ 3,068,800**
CALHOUN	GCRPC	$ 18,775,800
GOLIAD	GCRPC	$ 120,700
GONZALES	GCRPC	$ 175,200

[32] U.S. Small Business Administration Fact Sheet. November 7, 2017. "Disaster Loans, Texas Declaration #15274 and #15275."

County	COG	Business/EIDL Loans
JACKSON	GCRPC	$ 2,560,200
LAVACA	GCRPC	$ 9,400
VICTORIA	GCRPC	$ 51,392,300
Total GCRPC		**73,033,600**
AUSTIN	H-GAC	$ 231,400
BRAZORIA	H-GAC	$ 11,929,200
CHAMBERS	H-GAC	$ 17,392,300
COLORADO	H-GAC	$ 1,042,800
DEWITT	H-GAC	$ 796,200
FORT BEND	H-GAC	$ 30,944,300
GALVESTON	H-GAC	$ 81,769,200
HARRIS	H-GAC	$ 521,549,100
LIBERTY	H-GAC	$ 4,125,700
MATAGORDA	H-GAC	$ 3,021,100
MONTGOMERY	H-GAC	$ 24,573,500
WALKER	H-GAC	$ 265,200
WALLER	H-GAC	$ 1,440,200
WHARTON	H-GAC	$ 10,303,700
Total H-GAC		**$ 709,383,900**
HARDIN	SETRPC	$ 15,732,600
JEFFERSON	SETRPC	$ 188,117,500
ORANGE	SETRPC	$ 149,335,000
Total SETRPC		**353,185,100**
GRAND TOTAL		**$ 1,384,242,300**

The following table provides details from SBA as of January 1, 2018, on the application status for the 11,701 business applications that have been received. The application period for physical damages was scheduled to close on November 30, 2017, However, the SBA is accepting applications postmarked (or submitted electronically) within 60 days of the November 30 deadline without a justification requirement of the applicant. The deadline for small businesses and most nonprofits to apply for economic injury (working capital) is May 25, 2018.

Table 22: SBA Applicant Breakdown

Application Type	Amount	Percent
Total Business Applications	11,701	100.00%
Processed Applications	10,502	89.75%
In-Process Applications	1,199	10.25%
Declined Applications	5,030	47.90%
Withdrawn Applications	2,670	25.42%
Approved Applications	2,802	26.68%

3. Commercial Property Insurance

TDI's data also includes claims and loss information for commercial property insurance. Commercial property insurance includes coverage to commercial buildings (including some multi-family rental properties) and their contents against fire, windstorm, and other perils. The data collected by TDI also includes business owners and business interruption insurance. Commercial property policies usually do not provide coverage for flood or rising waters.

The data request included 58 counties in Governor Abbott's August 28, 2017, disaster proclamation, plus Williamson, Travis, Hays, and Hidalgo Counties. Milam and San Augustine Counties, which Governor Abbott added in the September 14, 2017, disaster proclamation, were not included. Figure 11: Hurricane Harvey Data Call Counties - Region Map, shows how TDI group counties by region.

The following chart shows the amount of claims that are paid (closed with a loss payment), claims closed without a loss payment, open claims, and reopened claims for commercial property by area.

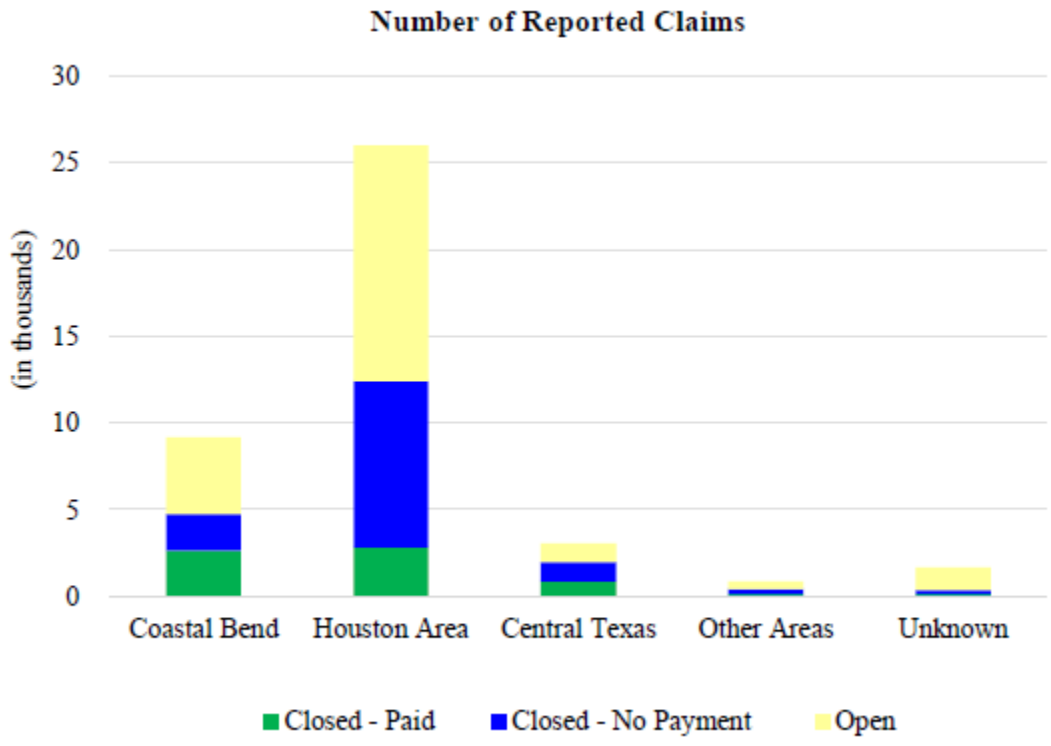


Figure 29: Number of Commercial Property Claims by Settlement Status and Area (Updated in APA 2)

The Coastal Bend and Houston area regions have the majority of commercial property losses.

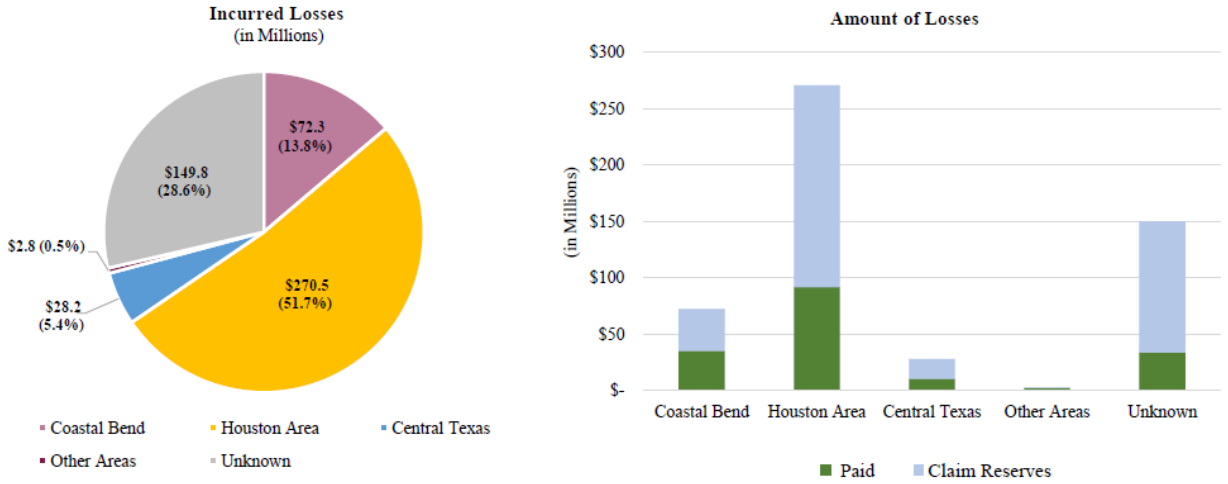


Figure 30: Commercial Property Incurred Losses and Amount of Losses by Area (Updated in APA 2)

4. Agricultural Impacts

Texas has a varied agricultural industry across the state. Agriculture provides jobs, food sources, trade, and port facilities used in the distribution of goods. This industry experienced serious loss from the rains and winds of Hurricane Harvey.

Source: AgriLife Extension Twitter Feed; https://twitter.com/txextension

As of November 1, 2017, Hurricane Harvey caused more than $200 million in crop and livestock losses, according to Texas A&M AgriLife Extension Service economists.[33] Estimated losses by commodity include $93 million in livestock loss; $100 million loss in cotton crops; and $8 million in loss to the rice and soybean industry. While the livestock numbers do include industry infrastructure such as fencing that must be repaired or replaced

[33] Texas A&M Agrilife Extension. "Texas agricultural losses from Hurricane Harvey estimated at more than $200 million." Webpage accessed January 10, 2018. . https://today.agrilife.org/2017/10/27/texas-agricultural-losses-hurricane-harvey-estimated-200-million/

and approximately 200,000 bales of hay lost, [34] it does not include an estimated number of dead livestock. These numbers are estimated to be in the tens of thousands. The reports also do not include losses to the fishing industry, including decreased fishing activity and storm-related damage to vessels and equipment. This estimate will not be available until after oyster season ends in late spring 2018. [35] These forthcoming numbers will cause the losses in the agriculture industry to continue to increase.

5. Tourism

The Texas coast has many communities that rely on employment and income from tourism. According to the governor's 2018 report, *The Economic Impact of Travel in Texas*, the total for direct travel spending in the state was $74.7 billion in 2017.

As such, the impacted counties along the coast are some of the long-established and most-visited tourist destinations. 11.9 percent of the employment in Aransas County and 7.0 percent in Galveston County is directly connected to travel and tourism. [36] Retail, hospitality, and entertainment are venues that contribute to the local community as well as overall state employment and business tax revenue. In 2017, the Gulf Coast region of Texas provided jobs to over 4.5 million people. [37]

Although current figures are not available, it is expected that the tourism industry will lose revenue as a direct result of Hurricane Harvey. Due to the timing of Hurricane Harvey, areas that rely on tourism have already seen a decline in revenue over Labor Day 2017. It is expected that the areas will also see losses during Spring Break 2018 and Summer 2018 due to the ongoing recovery process. The impacts will continue to be seen until tourists choose to return to the Texas coast they once frequented. The impact could be prolonged if tourists have a misconception of the actual amount of damage. Even areas with little to no disaster damage will likely see a decline in tourism based on public perception.

6. Texas Economy

In the Texas Comptroller of Public Accounts, February 2018 Fiscal Notes, "A Storm to Remember: Hurricane Harvey and the Texas Economy," the Texas Comptroller estimated the loss in business productivity from the Hurricane resulted in a $16.8 billion decrease in GSP. However, it is anticipated that gains to the GSP will be made resulting from recovery efforts and increased construction activity. The Texas Comptroller estimated the net impact of Hurricane Harvey will be a loss of $3.8 billion in GSP during the first year following the storm, with a cumulative gain of approximately $800 million over three years. According to the Texas

[34] Texas Farm Bureau. "Hurricane Harvey ag losses top $200 million." Webpage accessed January 10, 2018. http://texasfarmbureau.org/hurricane-harvey-ag-losses-top-200-million/

[35] The Texas Observer. "New Estimate Puts Harvey Agriculture Losses at $200 Million, One-Tenth of Irma." Webpage accessed January 10, 2018. https://www.texasobserver.org/agriculture-losses-estimated-200-million-harvey/

[36] Texas Tourism, Office of the Governor, Texas Economic Development & Tourism. The Economic Impact of Travel in Texas." August 2018. Webpage/PDF accessed August 30, 2018. http://www.deanrunyan.com/doc_library/TXImp.pdf

[37] Ibid.

Comptroller, it may be years before the full impact of Hurricane Harvey is known. [38] Based on the uncertainty of the overall need but the obvious impact the GLO is creating an Economic Revitalization Program that may be funded further from future Hurricane Harvey allocations.

[38] Texas Comptroller of Public Accounts. "A Storm to Remember: Hurricane Harvey and the Texas Economy." Webpage accessed February 18, 2018. https://comptroller.texas.gov/economy/fiscal-notes/2018/special-edition/impact.php

3.2. Needs Assessment – Harris County Local Action Plan

A. Cumulative Impact of Prior Disasters

Harris County has been impacted by six Presidential Declared Disasters in the last ten years. On September 13, 2008, Hurricane Ike, a Category 2 storm, made landfall along the upper Texas gulf-coast and was at the time the third most destructive hurricane and the third costliest U.S. hurricane. Harris County took a direct hit from the storm with projected cost of $3.58 billion in residential housing damage to over 230,502 housing units. Infrastructure damage was estimated at $582 million to repair critical infrastructure and facilities.

In 2015 and 2016, Harris County suffered four Presidential Declared Disasters: Memorial Day floods (DR 4223) of 2015, October floods (DR 4245) of 2015, Tax Day floods (DR 4269) of 2016, and May/June floods (DR 4272) of 2016. In the 2015 events, FEMA IA reported $10,553,227 in housing damage. The 2016 events were higher in severity with $74,642,169 in FEMA reported housing damage affecting 11,164 housing units. The unmet housing need was $37,553,806.

The cumulative impact of these past disaster and Hurricane Harvey has been devastating to local residents, businesses, and institutions. Recovery from one disaster has been exacerbated by the floods that followed.

B. Impact of Hurricane Harvey

Hurricane Harvey was the second most costly tropical cyclone impacting the United States. A total of 1 trillion gallons of water fell across Harris County over the 4-day period, which would fill NRG Stadium 1,472 times and cover Harris County's 1,777 square miles with an average of 33.7 inches of water. This volume of water would also run Niagara Falls for 15 days. Disastrous flooding occurred on many of the watersheds in the County and exceeded previous historical flooding records, including the worst storm event ever recorded for a similar square mile area in the state of Louisiana in August 1940 by 3.9 inches.

Harvey produced the largest and most devastating house flooding event ever recorded in Harris County. The county was named a HUD-identified "most impacted and distressed" (MID) area and all CDBG-DR programming will support projects within the County. Structure flooding occurred from both overflowing creeks and bayous as well as internal drainage systems being overwhelmed by the intense short duration rainfall rates. Both the Addicks and Barker Reservoirs reached their peak on August 30, 2017, exceeding previous pool records. These two Reservoirs combined impounded a total of 388,726 acre-feet of water at peak pool elevation or 126 billion gallons of water which would fill NRG Stadium 187 times. Widespread flooding of homes and streets occurred within the pools upstream of Addicks and Barker Reservoirs as well as flooding of major roadways within the reservoirs. Downstream of the reservoirs, the Corps of Engineers made the decision to release a combined 16,000 cubic feet per second. This is the highest release rate since the outlets were fully gated in 1963 due to flooding.

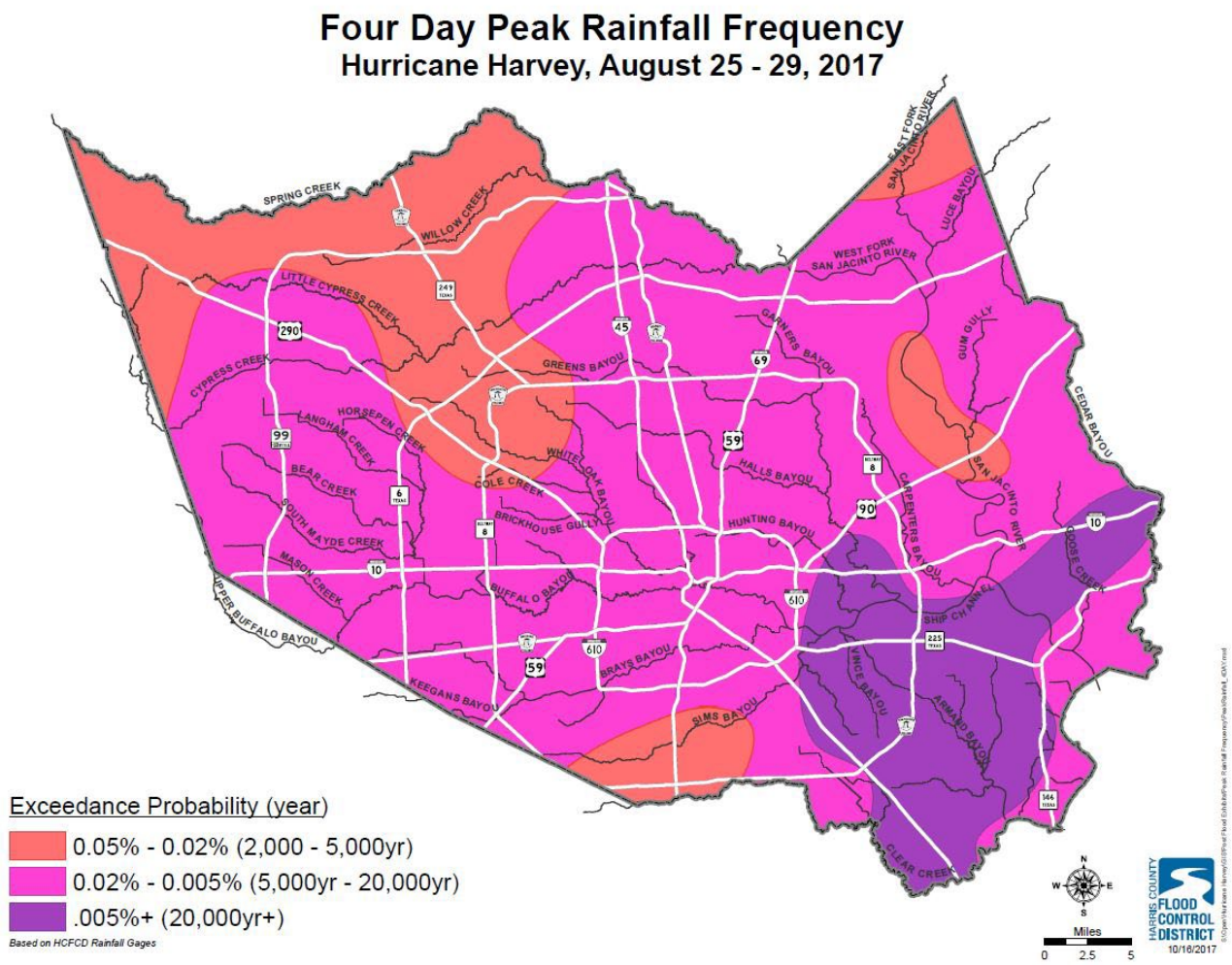


Figure 31: Four Day Peak Rainfall Frequency, Harris County

In the three weeks after the storm several Federal relief agencies began to offer assistance. D-SNAP is a short-term food assistance program to benefit families recovering from a disaster. The Texas HHSC with the partnership of Harris County, opened D-SNAP assistance locations in Harris County and reported the intake of over 678,000 D-SNAP applications.

FEMA also opened online and co-located with Harris County in Disaster Assistance Centers to intake and offer application assistance to those affected by Hurricane Harvey. In viewing the FEMA IA Data, in Harris County (outside the city of Houston), there were 160,695 households registered with FEMA. Slightly over 53 percent were provided FEMA assistance for their recovery. Of those, 178,627 applicants were eligible for Temporary Shelter Assistance as they were displaced from their housing. 23,392 Harris County applicants checked into FEMA lodging (i.e., hotels or rental units).

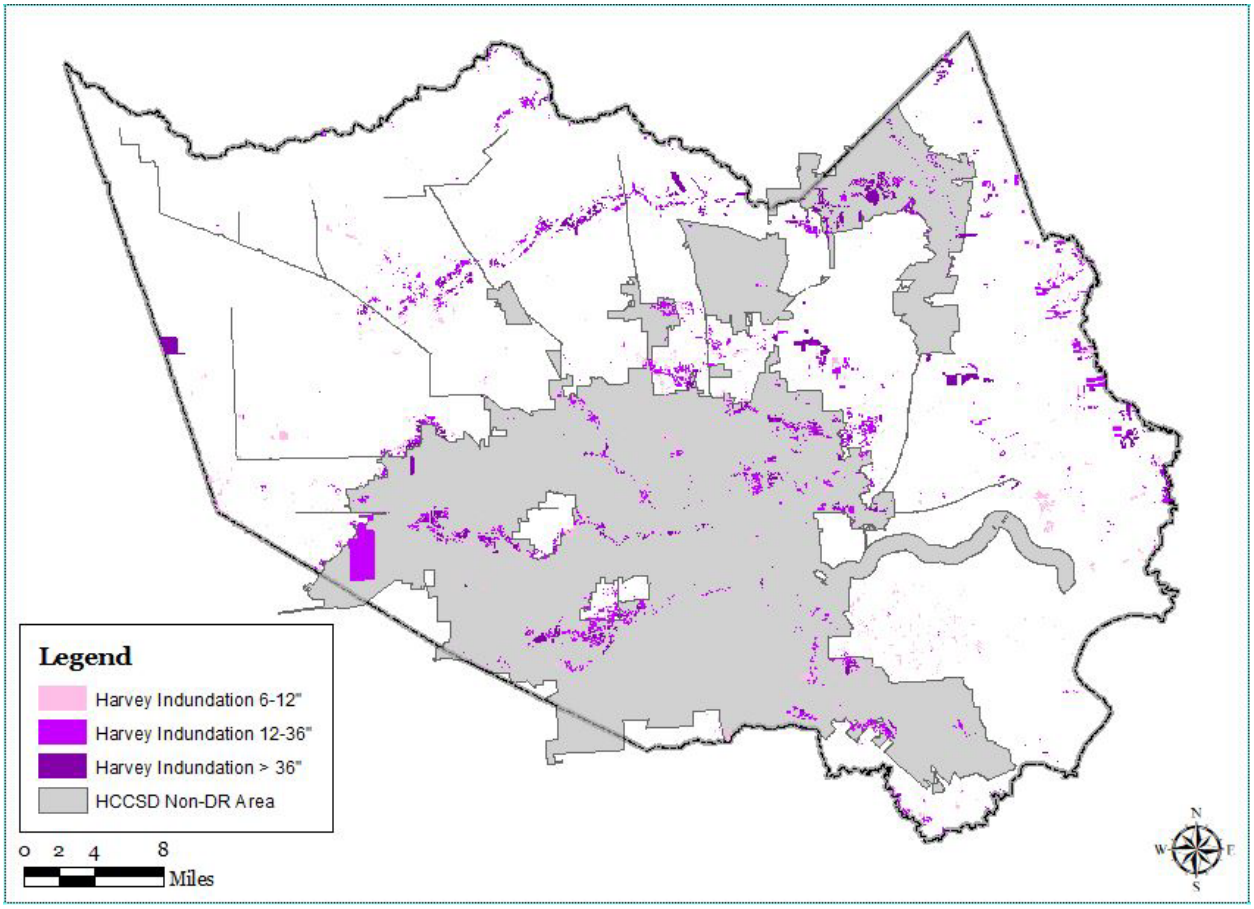


Figure 32: Flood Inundation over 6 inches, Harris County

C. Resiliency Solutions and Mitigation Needs

Harris County will follow the State's resiliency solutions as stated in the State of Texas *Plan for Disaster Recovery: Hurricane Harvey – Round 1.*

D. Demographic Profile of Impacted Counties

The demographic profile data was generated using data sets from the U.S. Census Bureau and HUD. Harris County population outside the city of Houston, including 33 small cities, is 2,285,540 persons, or 8.2 percent of the State's population. The area's population by race/ethnicity as seen in the following table is 36.41 percent white; 15.18 percent Black; 6.35 percent Asian; 39.98 percent Hispanic; and 1.91 percent other. There are over 787,507 housing units in the County (outside the city of Houston).

Table 23: 2016 Demographic Statistics for Harris County (outside the city of Houston) from the U.S. Census Bureau

	Texas	Harris County (outside city of Houston)	
Fact	**Estimates**	**Estimates**	**Percent**
Population estimates, 2016	27,862,596	2,285,540	8.20% (of Texas)
Population, percent change - April 1, 2010, (estimates base) to July 1, 2016	10.80%	12.10%*	
Persons under 5 years, percent, 2016	7.20%	175,548	7.68%
Persons under 18 years, percent, 2016	26.20%	655,146	28.66%
Persons 65 years and over, percent, 2016	12.00%	213,624	9.35%
White alone, percent, 2016	79.40%	1,562,157	68.35%
Black or African American alone, percent, 2016	12.60%	346,959	15.18%
American Indian and Alaska Native alone, percent, 2016	1.00%	4,265	0.19%
Asian alone, percent, 2016	4.80%	145,033	6.35%
Native Hawaiian and Other Pacific Islander alone, percent, 2016	0.10%	2,272	0.10%
Two or More Races, percent, 2016	1.90%	37,000	1.62%
Hispanic or Latino, percent, 2016	39.10%	913,743	39.98%
White alone, not Hispanic or Latino, percent, 2016	42.60%	832,131	36.41%
Housing units, 2016	10,753,629	787,507	
Owner-occupied housing unit rate, 2012-2016	61.90%	478,794	63.80%
Median value of owner-occupied housing units, 2012-2016	$142,700	$145,600*	
Median gross rent, 2012-2016	$911	$937	
With a disability, under age 65 years, percent, 2012-2016	8.10%	128,052	5.86%
Median household income (in 2016 dollars), 2012-2016	$54,727	$55,584*	
Persons in poverty, percent, 2012-2016	15.60%	12.87%	
Land area in square miles, 2010	261,231.71	1,103.89	0.42%

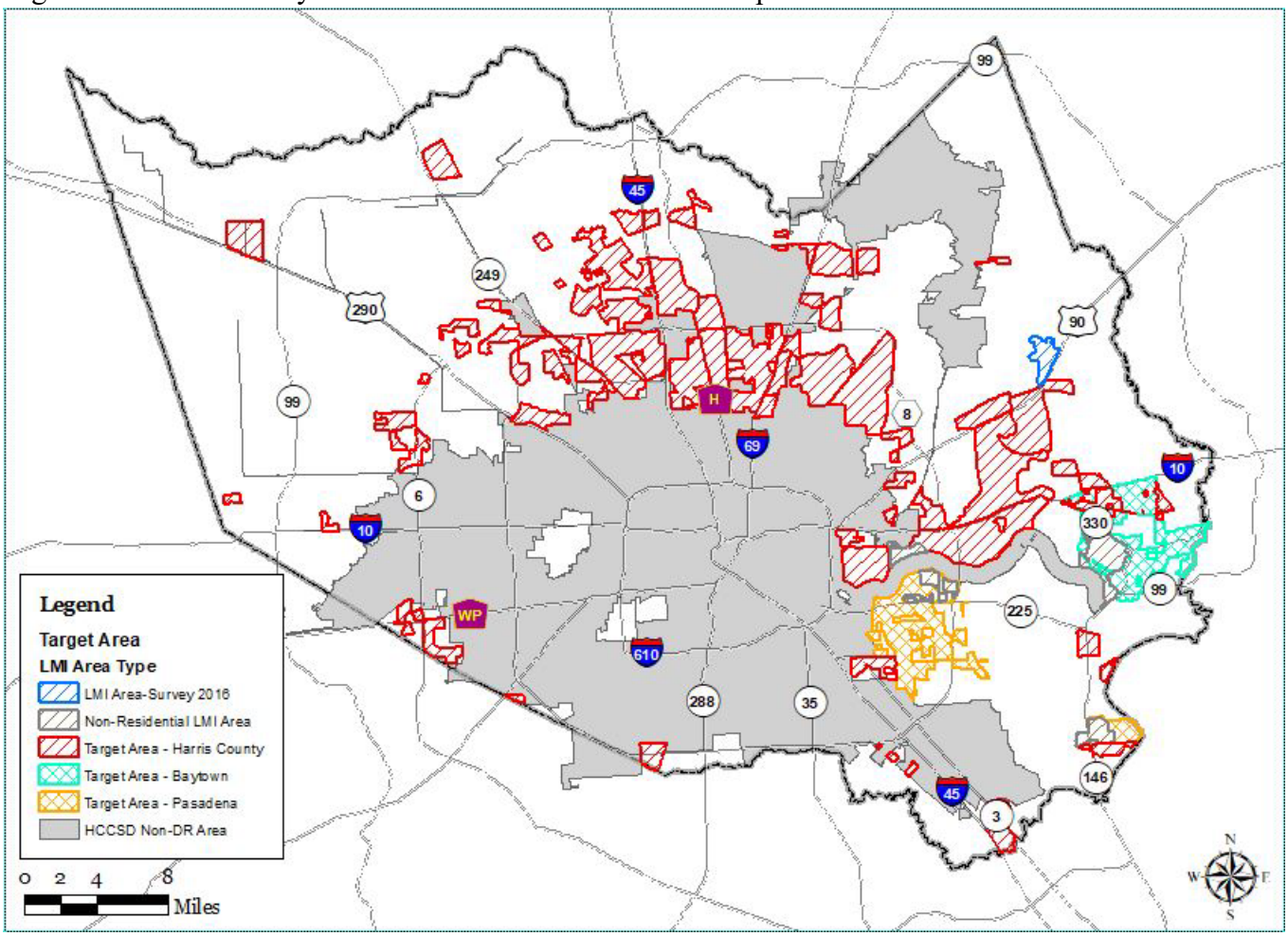
**Figure only available for all of Harris County.*

E. Low- and Moderate-Income Analysis

The following figure identifies census block groups that have a LMI population of 51 percent or more for Harris County using 2017 LMISD for the state of Texas, Harris County. [39]

[39] HUD Exchange. "FY 2017 LMISD by State - All Block Groups, Based on 2006-2010 American Community Survey." Webpage accessed January 10, 2018. https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/

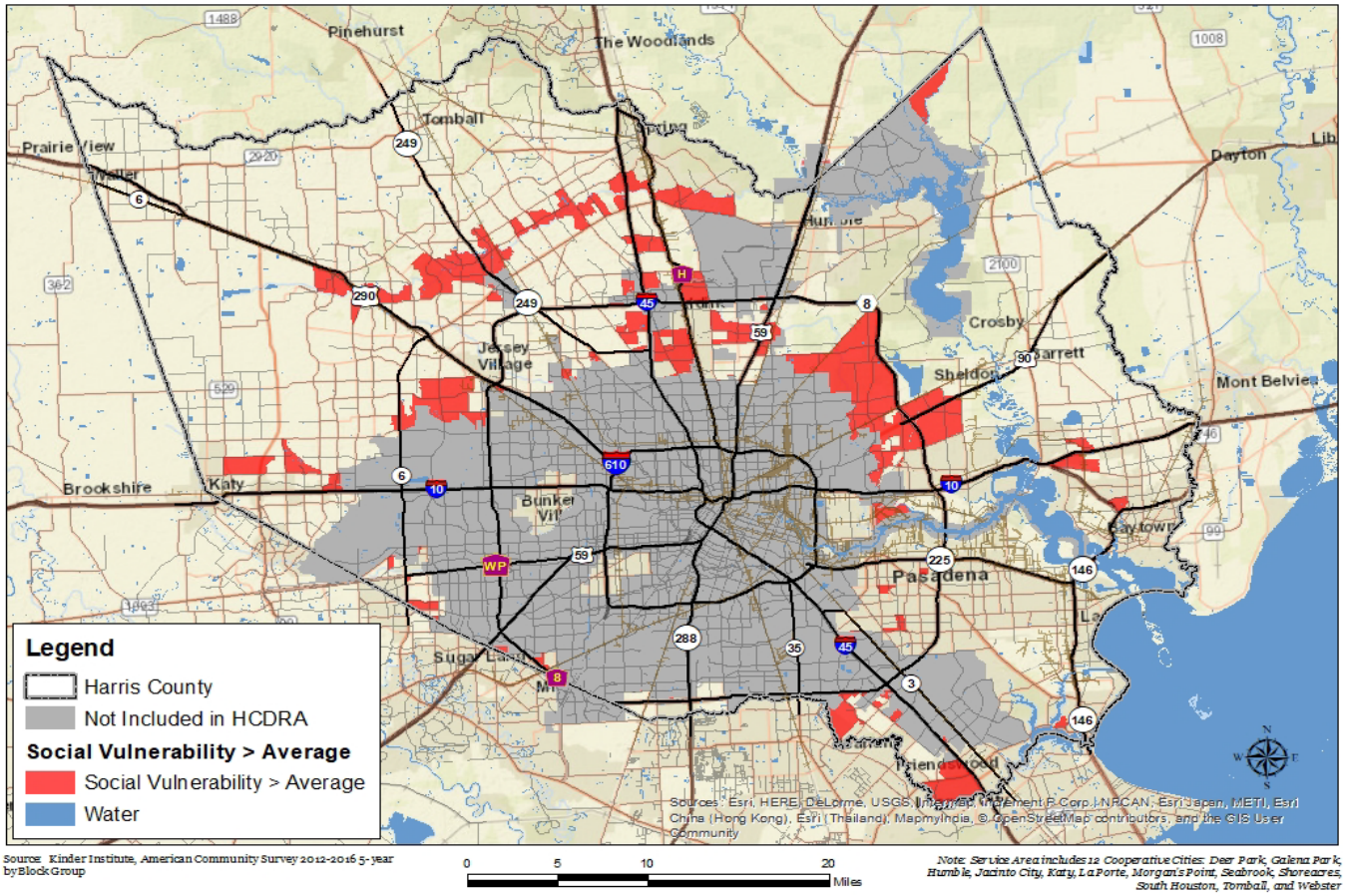
Figure 33: Harris County Low- to Moderate-Income Area Map



F. Social Vulnerability Index

An additional component to consider when looking at unmet needs is what level of social vulnerability to natural hazards is the area experiencing. The SoVI measures the social vulnerability of block groups in Harris County — in particular, their vulnerability to environmental hazards. With the assistance of Rice University Kinder Institute, Harris County's block groups were examined based on socioeconomic variables, which contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. The following figure shows those block groups with the highest vulnerability.

Figure 34: Harris County SoVI by Block Group



Source: Kinder Institute, American Community Survey 2012-2016 5-year by Block Group

Note: Service Area includes 12 Cooperative Cities: Deer Park, Galena Park, Humble, Jacinto City, Katy, La Porte, Morgan's Point, Seabrook, Shoreacres, South Houston, Tomball, and Webster

G. Housing Impact

1. Real Estate Market

In a report by the Kinder Institute, Harris County median housing prices have seen a significant jump in price (from $100,000 in 2012 to $141,000 in 2017), which hits low-income buyers especially hard. Hurricane Harvey has only increased the scarcity of safe, affordable single-family housing; post-Harvey median cost is estimated at $160,000. Although, the region has seen an increase in housing sales a low percentage are affordable, priced at $200,000 and below.

The scarcity of safe, quality affordable housing in Harris County has caused a severe housing burden and disproportionate housing needs particularly among African American, Hispanic, and large family (5+ persons) households.

The owner-occupied housing market in the Harris County region came to a standstill after Hurricane Harvey, as homeowners had to procure temporary accommodations while they began the recovery and home rebuilding process. Many residents of single-family homes that flooded repeatedly since 2015 decided to sell their properties to avoid rebuilding or further flooding, leaving them also in need of affordable housing. Selling their properties also opened the door for investors to turn them into rental units or perform a quick repair and flip of flooded homes. Residential buyouts in LMI areas are particularly needed to assist homeowners in repetitively high flood prone areas by relocating to areas that have a reduced flood risk without additional financial burden.

Prior to Hurricane Harvey, the county had reduced its level of seriously delinquent loans and real estate owned (REO) properties. With Harvey, County residents have the added housing burdens of repairing their homes, finding and maintaining temporary housing with possible rental fees, paying their mortgage, and replacing personal property such as furniture and vehicles. This is combined with the loss of wages or jobs during the days and weeks of Hurricane Harvey as businesses and schools were closed and left many households in financial straits. In addition, rising mortgage rates, potential foreclosures for homeowners without enough resources to repair, lack of flood insurance, and construction labor shortages have further exacerbated the recovery of the owner-occupied housing market.

Since Hurricane Harvey, it stands to reason that prices have fallen in neighborhoods that flooded. Many neighborhoods experienced significant flooding, and houses that once were owner-occupied have become rentals. Other residents have remediated the water damage and sold their homes for a fraction of what they were worth before the storm. Inventory, while still tight, reached a 3.4-months supply in March 2018, its highest level so far this year (2018). Lower-priced homes remain in high demand. The hot part of the housing market is the very bottom," said Gilmer, director of the Institute for Regional Forecasting at the University of Houston. "If you could get a house on the ground for under $200,000, you can sell them all day long."

With the heavy flooding and damage these homes sustained, affected populations faced an even greater need for affordable housing than before. In the Harris County Disaster Recovery Service Area, 21.4 percent of housing units reported some type of damage to their dwelling unit to FEMA. Homeowners reported between 6-36+ inches of flood water in their homes. With so many existing owner-occupied housing affected by Hurricane Harvey and in need of quality home repair, a construction labor storage, as well as fraudulent home repair companies preying on flood victims have stressed the system. Repair costs are still rising 1 year after the storm.

Hurricane Harvey produced the most devastating house flooding ever recorded in Harris County. As seen in the map below, flood inundation levels at 3 feet or more included areas of Harris County's LMI areas in Bear Creek, Addicks, Sheldon, Cypress, Airline, Aldine, South Houston, Pasadena, and Copperfield. These older, more densely populated neighborhoods comprising generally smaller, less expensive homes in the Harris County region experienced the worst of Hurricane Harvey's impact, compared to those in newer suburban developments.

Ditches in these older neighborhoods ended up overflowing due to 4 days of rainfall ranging from 26 to 47 inches, leading to the accumulation of water in these older homes.

One year after Hurricane Harvey, many residents throughout Harris County remain essentially homeless in their own homes. Many are still living in moldy, rotted, dusty, and unsafe homes unfit for human habitation. Residents report they can afford only a fraction of the repairs necessary to make their homes livable. Over 140 families 1 year after the storm are still living in FEMA-assisted temporary housing in Harris County with an assistance end date of February 28, 2019. Expenses such as for drywall, bathroom and kitchen replacement, electricity, and plumbing, can run tens of thousands of dollars. New regulations for new single-family home construction may further exacerbate the affordable housing crisis in Harris County. These new regulations require the elevation of new homes located outside the floodplain to 1 foot above the floodplain and those located inside the floodplain to 2 feet above the floodplain. This will prove costly, as the addition of elevated concrete slabs to these homes can total up to an additional $50,000, ultimately decreasing affordability in Harris County.

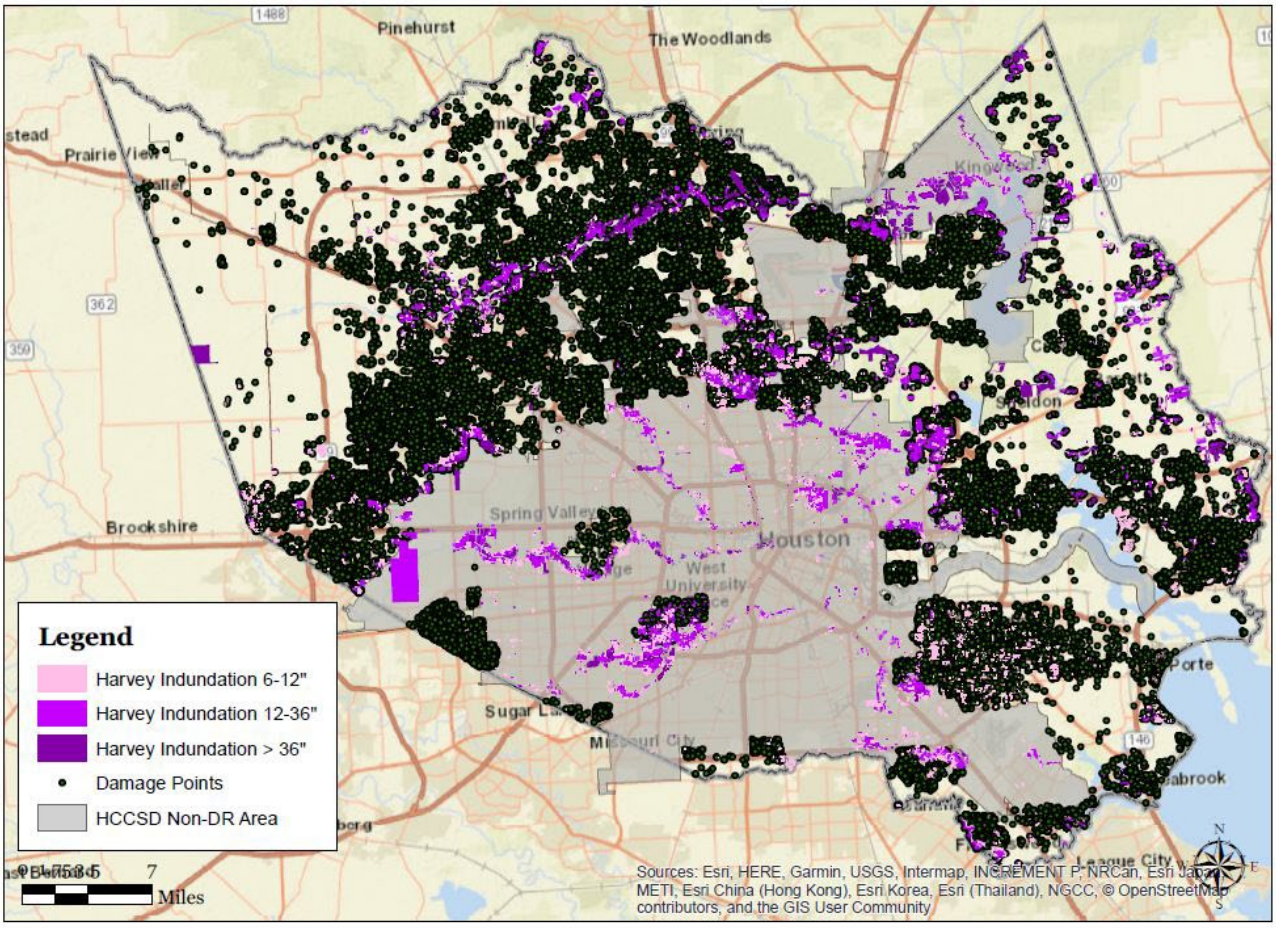


Figure 35: FEMA Valid Registrations in Harris County by Flood Inundation Map

The reality of Harvey recovery has been monumentally slow due to nearly 80 percent of households affected by Harvey not receiving enough, or in some cases no assistance at all. Many residents lack the funds for repairs or did not have flood insurance, according to FEMA IA data. As a result, many are living in partially repaired homes, or are still displaced and living in temporary housing, or on a friend or relative's sofa, and some are now homeless. Affordable-housing advocates call Harvey one of the largest housing disasters in American history, next to only Hurricane Katrina, which overwhelmed New Orleans in 2005.

2. Homelessness

Working with our surrounding jurisdictions, Harris County has been actively working to reduce the incidence of homelessness for over 15 years. The County have utilized our HUD entitlement funding of CDBG, Emergency Solutions Grant and HOME Investment Partnerships Program (HOME) grant plus local funding to provide social services and case management, housing and housing stabilization, healthcare and mental healthcare, and other services to vulnerable populations who are or are endangered of becoming homeless.

In Harris County, the Coalition for the Homeless of Houston/Harris County provides community coordination and planning for a regional homeless services system and is the lead agency for the area's CoC and conducts a PIT count of shelter and unsheltered persons in Houston, Harris County, Fort Bend County, and Montgomery County. For the past 7 years, the Count has shown a decrease from 8,538 to 3,412 persons. However, in the most recent Count released on May 23, 2018, there was an increase in the Count of 15 percent. It is assumed that this increase was from Harvey, with almost one in five of the unsheltered homeless individuals reporting Hurricane Harvey as their reason for being homeless.

As a part of the closing of the NRG and George R. Brown shelters, the Coalition, City of Houston, and Harris County worked with FEMA to create a non-congregant shelter program, which assisted those families and individual who did not have the resources to leave the shelter unaided by temporary shelter assistance. This population included families with children, elderly persons, couples, and single individuals – many of whom had special needs including chronic health conditions, mobility limitations, and mental illness. Based on preliminary information, most shelter guests are low or very-low income. At the Non-Congregant Shelter Program's height, there were approximately 500 households in the Program that received rental assistance and case management. Currently, roughly 200 households are still enrolled and benefiting from case management services.

3. Social Services: 2-1-1 Harris County Program

The United Way of Greater Houston serves as Harris County's 2-1-1 program administer. The 211 system helps Harris County residents connect with local health and human services and disaster resources programs by phone or internet. 2-1-1 is a free, anonymous, social service hotline available 24-hours a day, 7 days a week, 365 days a year. State and local health and human services programs address housing/shelter, employment, food/nutrition, veterans,

crisis/emergency, income/expenses, legal aid/victims, criminal justice, aging/disability, health/medical, mental health, and child care/education.

Between August 25 and September 30, 2017, the 2-1-1 system received approximately 100,000 calls. The call summary below shows the top ten calls received pre-Harvey and during Harvey (August 25–September 30).

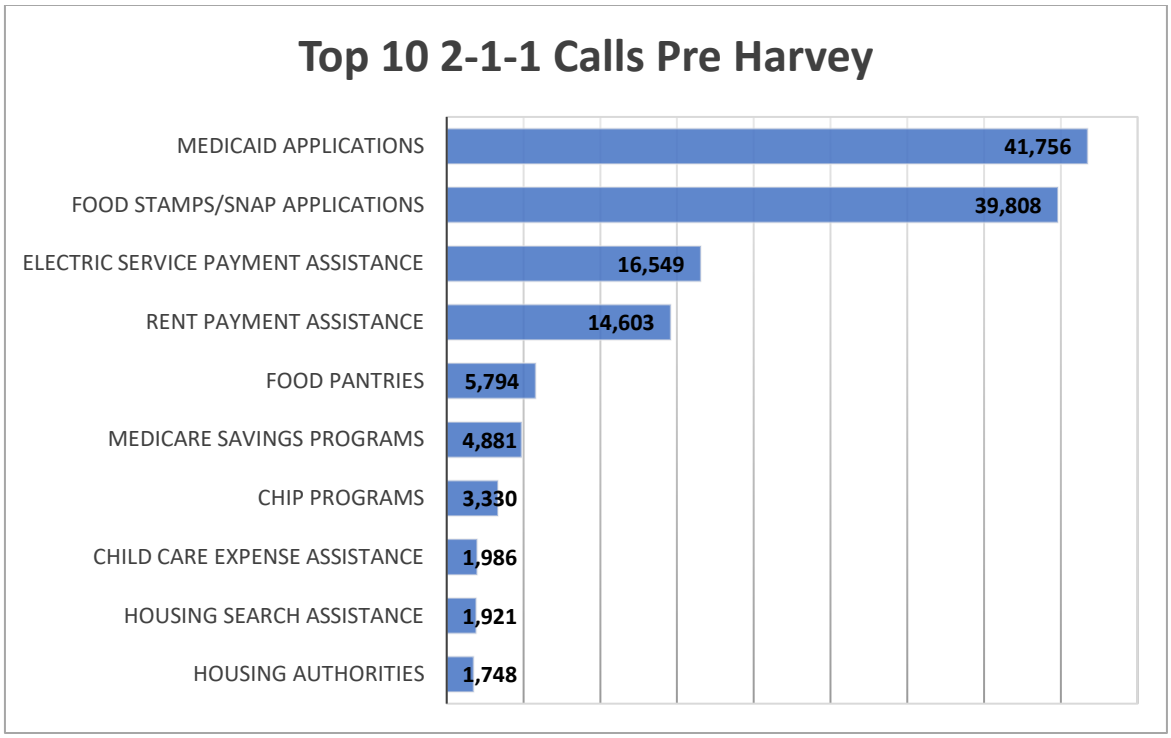


Figure 36: Top 10 2-1-1 Calls Pre-Harvey

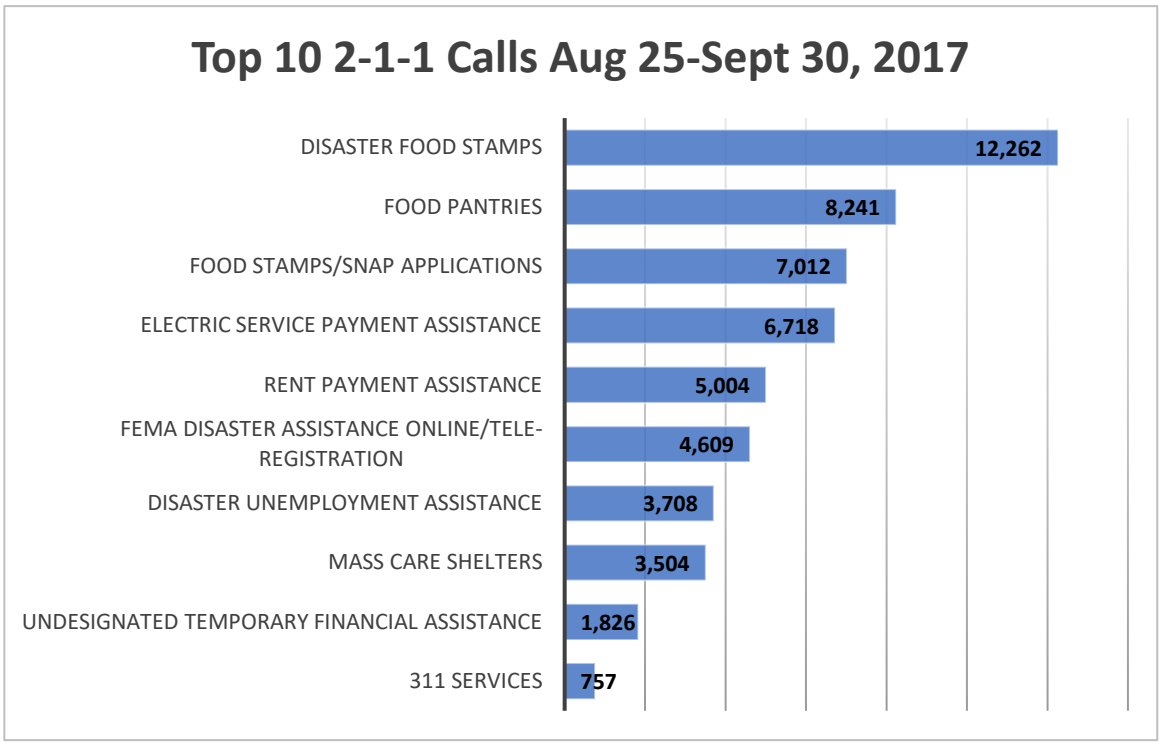


Figure 37: Top 10 2-1-1 Calls Aug. 25 to Sept. 30, 2017

4. Interim Housing Assistance

The Houston-Galveston Area Council operates the FEMA Direct Housing Program-Manufactured Housing Option in Harris County. Harris County Community Services Department staff have been contracted to provide case management services for those approximately 200 households in the program.

5. Insurance

TDI issued a report on Hurricane Harvey related claims on April 12, 2018. TDI issued a Hurricane Harvey data call for data through October 31, 2017 to all insurance companies, TWIA, and the Texas FAIR Plan (see Table 24). Data included number of reported claims, paid claims, claim closed without payment, claims reopened, claims with total losses, total amount paid losses, and total amount of claim reserved. As of October 31, 2017, 251,757 claims were reported in Harris County including all cities within the county with total amount of losses paid of $1,411,214,085.

Table 24: Hurricane Harvey Insurance Claims for all Harris County, as collected on October 31, 2017 and reported April 12, 2017 by TDI

	Number of Claims	Total Amount of Losses Paid	Total Amount of Losses Incurred
Personal Line of Insurance	251,757	$1,411,214,085	$1,644,387,050
Other Line of Insurance	59,646	$2,220,459,246	$5,122,382,647

6. National Flood Insurance Program

According to data from the NFIP in January 2018, in Harris County (outside the city of Houston) there were 21,800 NFIP claims of which 17,081, or 78.4 percent, were paid claims. The total claims paid was $1,894,715,877 with an average claim of $110,925.35.

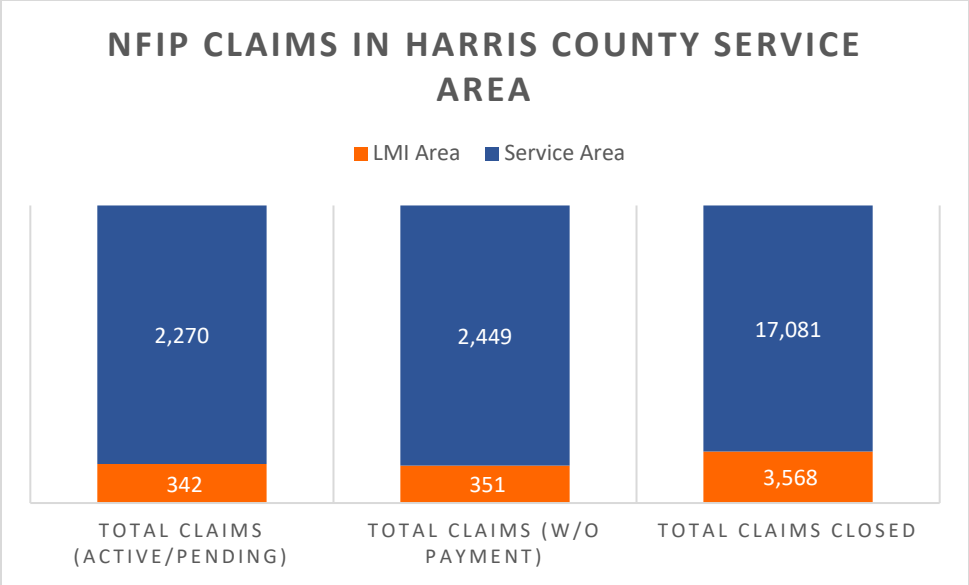


Figure 38: NFIP Claims in Harris County (outside City of Houston)

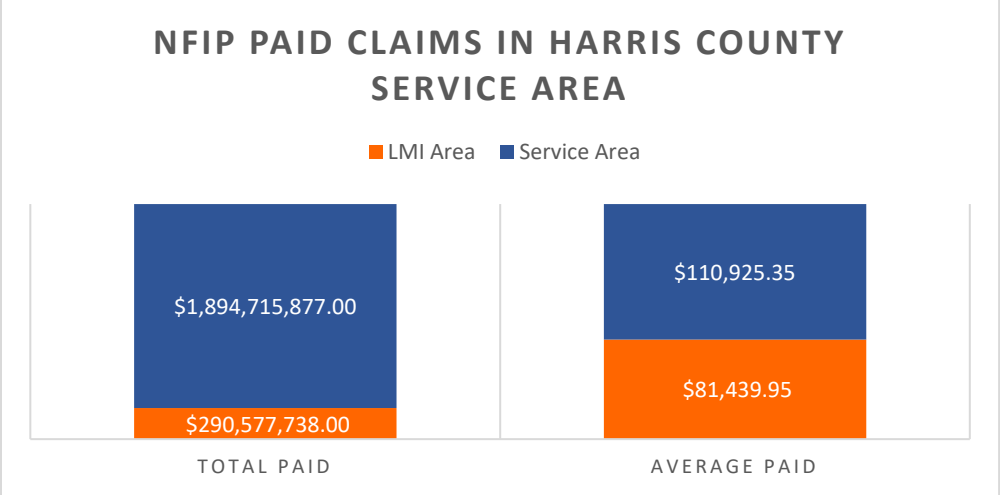


Figure 39: NFIP Paid Claims in Harris County (outside City of Houston)

In the county's low- to moderate-income (LMI) areas there were 4,261 claims, which represents 19.5 percent of all claims in Harris County. The total claims paid in LMI areas was 3,568 or 20.9 percent of paid claims with the total claims paid of $290,577,738. The average claim paid in LMI areas was $81,439.95. While LMI households made up over 70 percent of the FEMA IA applicants in the county, only about 20 percent of NFIP resources went to LMI areas. This indicates that LMI households were likely under-represented in the NFIP claims due to inability to afford flood insurance and high claims denial rates by NFIP.

7. Texas Windstorm Insurance Association

TWIA was established by the Texas Legislature in 1971 in response to regional market conditions following Hurricane Celia in August 1970. TWIA's purpose is to provide

windstorm and hail insurance for the Texas seacoast. Although in Harris County damage was mostly a flooding event, some wind damage was reported along the coastline. In Harris County, there were 593 new claims with a total indemnity paid of $3,046,684 and an average paid of $9,260.

8. Small Business Assistance Disaster Home Loans

Within Harris County (outside the city of Houston), SBA Disaster Home Loans to those who could avail totaled $67,065,960 as of December 2017. The average loan disbursed by December 2017 was $21,324 and tended to be awarded to those of gross incomes higher than area median. The gross income of those to whom SBA Disaster Home Loans had been disbursed averaged $117,192 as of December 2017. Only 15 percent of these loans were written to renters.

9. Public Housing Assistance Data

The HCHA did report damage to property and is currently reviewing cost estimates for that damage. Preliminary reports estimate $933,384 in damage costs with 251 units affected by Hurricane Harvey over 7 properties. This does not account for tenant temporary relocation costs as units are repaired. The greatest damage was to Magnolia Estates Seniors property. Four buildings (24 units) flooded with 18 inches of water. The lift station on this property had its 5 HP pump burned out after an electrical surge. Other properties experienced minor roof leaks in units and offices, damaged fencing, and water intrusion around doors and windows.

10. FEMA Individual Assistance

Total Harris County (unincorporated area and all 34 cities) contained 36 percent (323,155) of all FEMA Registrants in Texas, and 39 percent of FEMA Registered homeowners affected by Hurricane Harvey. The area's FEMA Registrants included 171,622 owner-occupied households and 150,221 renter-occupied households. For Harris County (outside the city of Houston), there are 61,828 applicants with a FVL of over $0. Of these, 45,634 (73.8 percent) were owners and 16,175 (26.2 percent) were renters.

Table 25: Total FEMA IA Applications in Harris County (outside city of Houston)

Occupancy Type	Total Applications in Harris County	FVL over $0	Applicants with Unmet Need
Owner	94,208	45,634	23,948
Renter	65,922	16,175	8,740
N/A	565	19	0
Totals	160,695	61,828	32,688

It should be noted that the FEMA IA for Harris County (outside the city of Houston) listed only 4,460 total applicants who were age 60 and over with only 958 applicants with a FVL over $0 and who received some FEMA assistance. Harris County has more than 300,000

residents over the age of 60. The county believes based on anecdotal accounts of canvassers, case management agencies, and rebuilding organizations that the FEMA numbers for seniors, who had a FVL over $0 and received some assistance, significantly underestimate the unmet needs of seniors in Harris County.

a. Total Unmet Needs

To calculate estimated unmet need, Harris County used the same methodology as the GLO, using multipliers provided by HUD and level of damage criteria. These multipliers, as seen in the table below, are based on SBA median repair cost for the specific disaster category less the weighted average of expected SBA and FEMA repair costs. Based on FEMA IA data provided to the GLO, the estimated weighted average of expected SBA and FEMA total repair costs for each category is represented in the following table.

Table 26: Unmet Need Multiplier by Damage Category

Category	Multiplier Amount
Major-Low	$58,956
Major-High	$72,961
Severe	$102,046

The FEMA IA data was used to compute all housing applicants impacted by Hurricane Harvey and calculate the unmet needs for housing. The unmet need for the LMI population is over $895 million for owners. The unmet need by income category for owner-occupied households in Harris County can be seen in the table below. The following table provides a breakdown of total unmet needs for owner- and renter-occupied households. It provides the damage category and the total count and unmet need for those three categories as previously defined.

Table 27: Category of Unmet Needs by Owner-Occupied and Renters in Harris County (outside city of Houston)

Damage Category/ Multiplier	Total Count	Total of Owner-Occupied and Rental Unmet Needs	Owner-Occupied Count with Unmet Need	Total Owner-Occupied Unmet Needs	Rental Count	Total Rental Unmet Needs
Major-Low: $58,956	12,587	$742,079,172	9,551	$563,088,756	3,036	$178,990,416
Major-High: $72,961	14,980	$1,092,955,780	10,415	$759,888,815	4,565	$333,066,965
Severe: $102,046	5,121	$522,577,566	3,982	$406,347,172	1,139	$116,230,394
Totals	32,688	$2,357,612,518	23,948	$1,729,324,743	8,740	$628,287,775

HUD requirements for this CDBG-DR allocation specify that the GLO and thus Harris County must expend a minimum of 70 percent to benefit LMI populations. In Harris

County, approximately 59.8 percent of the unmet need population is below 80 percent in the LMI category. The unmet need by income category for Harris County can be seen in the following table.

Table 28: Unmet Need by Income Category/Owner-Occupied and Renters in Harris County (outside the city of Houston)

Income Category	Count	Unmet Need	% of Count	% of Unmet Need
0-30%	9,582	$ 686,167,397	29.3%	29.1%
31-50%	4,498	$ 319,751,533	13.8%	13.6%
51-80%	5,452	$ 389,463,677	16.7%	16.5%
Not LMI	13,156	$ 962,229,911	40.2%	40.8%
Not Reported	0	0	0	0
Totals	32,688	$ 2,357,612,518	100.0%	100.0%

b. Owner-occupied Unmet Need

To calculate the level of real property damage for owner-occupied homes, the following criteria was used:

- **Major-Low:** $8,000 to $14,999 of FEMA verified loss.
- **Major-High:** $15,000 to $28,800 of FEMA verified loss.
- **Severe:** Greater than $28,800 of FEMA verified loss.

In Harris County, approximately 52.5 percent of the owner-occupied unmet need based on FEMA IA is below 80 percent LMI category. The unmet need for the LMI population is over $895 million for owners. The unmet need by income category for owner-occupied households for Harris County can be seen in the following table.

Table 29: Owner Unmet Need by Income Category in Harris County (outside the city of Houston)

Income Category	Count	Unmet Need	% of Count	% of Unmet Need
0-30%	5,922	$ 425,034,847	24.7%	24.6%
31-50%	2,805	$ 197,603,740	11.7%	11.4%
51-80%	3,838	$ 272,585,298	16.0%	15.8%
Not LMI	11,383	$ 834,100,858	47.5%	48.2%
Not Reported	0	0	0	0
Totals	**23,948**	**$ 1,729,324,743**	**100.0%**	**100.0%**

c. Renter-occupied Unmet Need

Rental units are determined to be the most impacted if they have real property damage of $2,000 or more. To calculate the level of personal property damage for renters, the following criteria was used:

- **Major-Low:** $2,000 to $3,499 of FEMA verified loss.
- **Major-High:** $3,500 to $7,499 of FEMA verified loss.
- **Severe:** Greater than $7,500 of FEMA verified loss.

In Harris County, approximately 79.7 percent of the unmet need based on FEMA IA is below 80 percent LMI category. The unmet need for the LMI population is over $500 million for renters. The unmet need by income category for renters in Harris County can be seen in the following table.

Table 30: Renter Unmet Need by Income Category in Harris County (outside the city of Houston)

Income Category	Count	Unmet Need	% of Count	% of Unmet Need
0-30%	3,660	$ 261,132,550	41.9%	41.6%
31-50%	1,693	$ 122,147,793	19.4%	19.4%
51-80%	1,614	$ 116,878,379	18.5%	18.6%
Not LMI	1,773	$ 128,129,053	20.3%	20.4%
Not Reported	0	0	0	0
Totals	**8,740**	**$ 628,287,775**	**100.0%**	**100.0%**

d. Owners in a Floodplain with No Flood Insurance

As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, grantees are prohibited from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if the combined households income is greater than 120 percent AMFI or the national median, the property was located in a floodplain at the time of the disaster, and the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

Low- to Moderate-income applicants in Harris County comprise 65.1 percent of the total owners with unmet needs in a floodplain with no flood insurance. Whereas those over 120 percent of AMFI are 20.8 percent of the total owners with unmet needs in a floodplain with no flood insurance.

Table 31: Owners in a Floodplain with No Flood Insurance by Income Category in Harris County (outside city of Houston)

Income Category	Count	% of Count
0-30%	1,320	32.0%
31-50%	678	16.4%
51-80%	690	16.7%
81-120%	579	14.0%
Over 120%	859	20.8%
Not Reported	0	0%
Totals	4,126	100.0%

11. Public Services

Programs, such as those discussed in the Use of Funds section (5.2.D), can be difficult to navigate without assistance. Applicants are likely to need support throughout the process. Applicants may have suffered significant losses and emotional hardships. In order to provide housing and non-housing programs to the public, particularly vulnerable populations, services such as case management, housing counseling, legal counseling, transportation services, and housing navigation will be needed to assist households to successfully navigate the programs.

12. Residential Buyout Program

HCFCD has operated the Harris County Residential Buyout Program since 1985 and acquired and removed approximately 3,000 houses that are hopelessly deep in the floodplain where flood damage reduction projects, like channel improvements or storm water detention basins, are not cost effective and/or beneficial. Once bought out, these parcels are returned to their beneficial function aiding in the storage of floodwaters. Those homeowners who are bought out are assisted to move to an area with a reduced flood risk.

HCFCD has identified 43 areas in unincorporated Harris County or in one of the county's small cities that fits the above definition. These areas contain approximately 3,300 parcels to acquire. Of the 43 buyout interest areas, the county has identified 13 areas that are in low- to moderate-income areas and/or in Social Vulnerable areas (shown in Figure 40). Seven of the 13 areas have an average home market value of under $85,000. The lowest average home market value was $27,105 in the community of Allen Field. As stated in the above section G.1. Real Estate Market, median home price in Harris County is $160,000. The low market value of the homes to be bought out to the higher median home price may place a severe cost burden on low-income and vulnerable populations to find safe, quality affordable replacement housing. Additional housing incentives, the creation of new affordable housing, and homebuyer assistance programs will be needed to alleviate this burden.

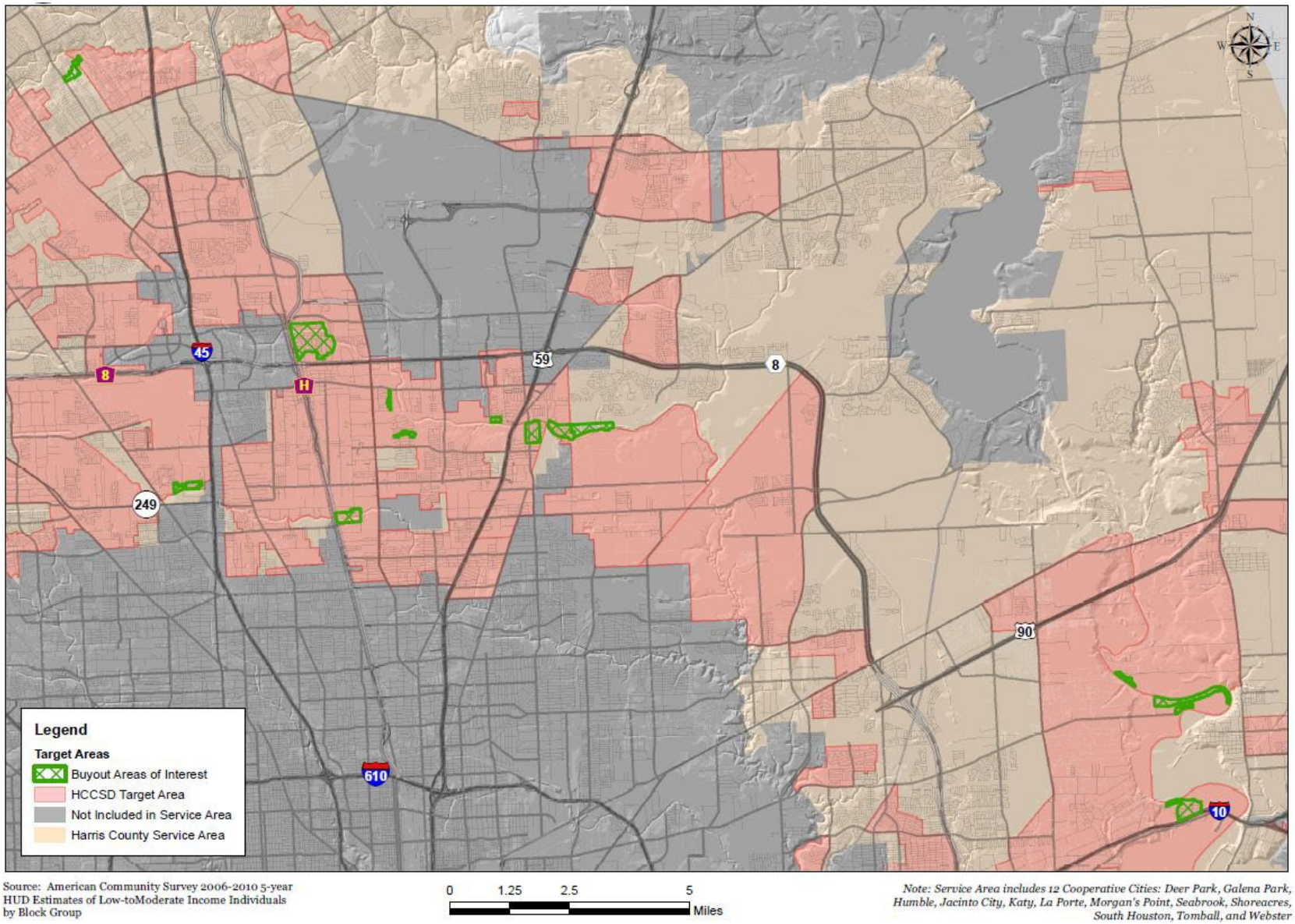


Figure 40: Harris County Buyout Areas in Harris County Low- to Moderate-Income Areas

13. Planning Activities

Well-thought-out and inclusive planning paves the way for effective and efficient implementation of projects and activities. The planning process is iterative, with each phase overlapping and informing the others. Harris County will invest sufficient planning funds to accurately identify unmet needs, which will ensure that projects are implemented in a manner to achieve successful completion. As Harris County is a HUD-identified "most impacted and distressed" area, planning activities will enhance programs, operations, and knowledge for recovery. The County may also work with other local jurisdictions, universities, and advocates on various types of planning projects. Additional information is available in the Use of Funds for Harris County in Section 5.2.D.

H. Infrastructure Impact

County infrastructure was affected by Hurricane Harvey. This event caused damage to roadways, bridges, sections of the coastline, and many other infrastructure systems that are still being assessed. Disastrous flooding occurred in many of the watersheds in Harris County. Historical records held by previous massive floods in October 1994, Tropical Storm Allison, and April 2016 (Tax Day) were exceeded by Harvey at many locations. Based on house flooding assessments by the County, the estimated total number of homes flooded within Harris County is 154,170. Public facilities and infrastructure that serve those neighborhoods were also affected by the flooding.

Public buildings, such as libraries, courtrooms, jury assembly buildings, county annexes, and healthcare facilities were damaged by Harvey. During the storm, 44 area hospitals and other health facilities evacuated over 1,500 patients, estimates the Southeast Texas Regional Advisory Council, who coordinated the regional response during Harvey. One of these hospitals has completely closed. Damage to infrastructure was also reported. Several roadways to LMI neighborhoods reported collapse or were severely damaged, making recovery difficult. Many neighborhood roads in high-impact LMI areas, such as Aldine, Airline, Sheldon, Cloverleaf, Pine Trails, and Normandy Crossing, and in cities such as South Houston, Pasadena, and Humble were flooded just as homes were on those streets. Roadways around the two reservoirs, including Clay Road, North Eldridge Parkway, State Highway 6, Groeschke Road, Patterson Road, Westheimer Parkway, and South Barker Cypress Road were flooded for weeks and, in the case of Patterson Road, over a month.

According to a study by the Texas Association of Water Board Directors (AWBD) of the Houston Metropolitan Statistical Area's (MSA) 945 utility districts, 253 districts had some flooding in their service areas. Seventy-six (76) Harris County districts issued a boil water notice, and 3 (of 627) wastewater treatment plants located in the County were completely destroyed. Without these utilities operating at full capacity, recovery of damaged neighborhoods will be delayed.

HCFCD estimates the total need in Harris County for flood risk reduction projects is $25 billion to achieve a 1 percent (100-year) level of service in Harris County. The project list developed by HCFCD includes projects that address documented flooding issues in the 22 watersheds – issues that come into play any time excessive rainfall takes place in those watersheds. By reducing the future flood risk, the County, particularly the housing department, will be better prepared for the next storm.

In order to assist the County and small cities within the County to provide recovery efforts to their neighborhoods and protect housing recovery investments, the County will set-aside 21 percent of CDBG-DR funding for improvement to damaged infrastructure and mitigation projects to protect against future storms and flooding. Any remaining unmet housing need will be addressed with other sources both private and public.

1. FEMA Public Assistance

The below table provides a high-level approximation of total costs and total need for each PA category as of June 1, 2018 for Harris County and 33 small cities. Harris County and HCFCD are self-insured, thus did not receive private insurance proceeds for infrastructure projects. As illustrated in the following table, the categories with the highest total need are Buildings and Equipment then Emergency Protective Measures showing a total PA need for the County. It should be noted that PA project worksheets are still under development by the local jurisdictions and under review by FEMA and TDEM. These amounts are expected to increase.

Table 32: Total Cost and Need by PA Category in Harris County

PA Category (49 Counties)	Approx. PA Cost	10% Local Match	15% Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)
A - Debris Removal	$ 65,629,614.39	$ 6,562,961.44	$ 9,844,442.16	$ 16,407,403.60
B - Emergency Protective Measures	$ 200,492,321.33	$ 20,049,232.13	$ 30,073,848.20	$ 50,123,080.33
C - Roads and Bridges	$ 715,534.17	$ 71,553.42	$ 107,330.13	$ 178,883.54
D - Water Control Facilities	$ 72,069,272.47	$ 7,206,927.25	$ 10,810,390.87	$ 18,017,318.12
E - Buildings and Equipment	$ 339,883,959.96	$ 33,988,396.00	$ 50,982,593.99	$ 84,970,989.99
F - Utilities	$ 30,061,407.49	$ 3,006,140.75	$ 4,509,211.12	$ 7,515,351.87
G - Parks, Recreational Facilities, and Other Items	$ 7,419,760.39	$ 3,741,976.04	$ 5,612,964.06	$ 9,354,940.10
Z - Direct Administrative Costs	$ 9,184,044.43	$ 918,404.44	$ 1,377,606.66	$ 2,296,011.11
Grand Total	**$755,455,914.63**	**$75,545,591.46**	**$113,318,387.19**	**$188,863,978.66**

As stated above in the IA section, need per capita is a good indicator when looking at a community's ability to pay for recovery. The three counties with the highest per capita PA need

are Harris ($1,412), Aransas ($1,296), and Refugio ($1,100) according to the State's Action Plan.

2. Commercial Buyout

As discussed in section G.11 Residential Buyout, Harris County has been involved in residential buyouts since 1985. HCFCD has identified 43 areas in unincorporated Harris County or in one of the county's small cities that fits the buyout definition. These areas contain approximately 3,300 parcels to acquire. Some of these parcels are partial home business and small business that will also need buyout and relocation as we relocate the residents around these businesses. The county has identified in its 13 low-income buyout areas approximately 87 commercial and industrial parcels with a 2017 market value for the parcel of roughly $10 million. A Commercial Buyout Program is needed and will purchase commercial properties, where the owner has voluntarily agreed to sell, in communities that have suffered from multiple disasters or are at a high risk of suffering from additional disasters, such as properties in the 100-year floodplain. In any proposed program for Commercial Buyout, Harris County will follow the URA, if required, and will provide relocation payments and assistance to displaced businesses. Harris County will attempt, as much as possible, to help relocate communities in close proximity to original locations to preserve community character and financial structure.

3. Method of Distribution

A MOD of CDBG-DR funding allocated to Harris County will be established to assist the County and its small cities most impacted by Hurricane Harvey with their recovery. Due to the limited amount of CDBG-DR funding available to address the overall unmet need, the MOD encourages a focus on key systems, which will have an effect to correct damage, alleviate future disasters, particularly flooding, and/or increase public safety and mitigation. The County will complete a MOD submission for GLO approval that outlines the prioritization and method for distributing CDBG-DR funding.

I. Economic Impact

Data obtained for Harris County from August 1, 2017, through December 7, 2017, tracked the businesses within Harris County that received SBA loans for property and content losses. The total of loans for approximately 70 businesses amounted to $39,287,300 throughout the unincorporated County. Since this program loans only for businesses that may have difficulty in obtaining conventional loans, it represents only a portion of the impacts to businesses from Hurricane Harvey. It also does not include additional costs that are more difficult to quantify, such as business interruption impacts and other types of lost income. However, since it is a loan program and not a grant program, the loans obtained should be considered the minimum economic business impact from this event.

In addition to the commercial businesses applying for SBA loans, Harris County provided an assessment of commercial properties impacted by Hurricane Harvey. A methodology similar to the one used to establish damages to residential properties was used for establishing business

properties inundated by Harvey. The Army Corps of Engineers Damage Assessment Curves were applied to establish the level of damages of 437 properties. The total amount of assessed damage to these properties was $62,346,950. It should be noted this is an assessment of property damage only and does not account for lost revenue and other business interruption impacts. Accordingly, it should be assumed the total economic losses to businesses can be assessed at $101,634,250.

Commercial buyout is also needed within the 13 buyout areas discussed under residential buyout. Within the 13 areas, there are 789 commercial parcels with an average assessed value of approximately $25,000. The commercial property types range in average assessed value from the 2 industrial properties with an average assessed value of $650,000 to the 630 vacant lots at an average assessed value of $12,924. There are 85 occupied commercial parcels with an average assessed value of $100,500. The estimated cost to buyout these properties is approximately $20 million, plus relocation costs at an additional $15 million. This creates an unmet need of approximately $80 million (which is less than the SBA assistance and planned CDBG-DR Round 1 funding).

3.3. Needs Assessment – City of Houston Local Action Plan

A. Cumulative Impact of Prior Disasters

Houston's flat terrain and topography make it vulnerable to flooding. Over the past decade, Houston has experienced several major flood events from hurricanes and storms. Hurricane Ike was a strong Category 2 storm when it made landfall in Galveston in 2008. Many residents lost power for several days, with approximately 95 percent of CenterPoint Energy's 2.26 million customers losing power [40].

In 2015 and 2016, the region received unprecedented rainfall from several storms, which led to many neighborhoods experiencing flooding multiple times in a two-year period. During Memorial Day weekend and Halloween weekend in 2015, Houston experienced severe flooding from storms that impacted the wider Gulf Coast area. The President declared both events major disasters. In April and June 2016, Houston once again received record-breaking rainfall and experienced severe flooding. The President also declared these two flood events major disasters. Almost one third of the 16,000 buildings damaged in the 2015 and 2016 flood events were located outside the FEMA floodplains.

These flood events were followed by Hurricane Harvey in 2017. The cumulative impact of these disasters has been devastating in Houston and the scale of damage is unprecedented. Thousands of residential and commercial buildings have been damaged. Infrastructure has been overwhelmed or destroyed, and there has been loss of life and property. According to estimates, no other area in the country has experienced this level of devastation from flooding and the cost associated with the impact of these disasters is at an extraordinary scale not experienced before.

B. Impact of Hurricane Harvey

Hurricane Harvey made landfall on the Texas coast as a category 4 hurricane on August 25, 2018, and as it moved inland, it slowed and stalled over the Houston area. A heavy rain band developed over Fort Bend and Brazoria counties and spread into Harris County. The Houston area received unprecedented levels of rainfall in the next two days as the system remained stalled, dumping over 50 inches of rain in the area, according to the National Weather Service, making it a 1-in-1,000-year flood event. According to the National Hurricane Center, Harvey's rainfall is the highest-ever recorded rainfall for a tropical storm in the continental United States since rainfall records began in 1880.

While Hurricane Harvey did not cause extensive wind damage and power outages to Houston, it brought on prolonged and widespread flooding. The flood event initially lasted several days, and thousands of Houstonians had to evacuate their homes. Areas in Houston had flood water levels between 1 foot and 6 feet. According to HoustonRecovers.org, there were more than 8,500 calls to 911 on just one day, August 27, 2018, approximately 3,000 more than in an average day. Many Houstonians were rescued by emergency responders. Others were rescued by volunteers with

[40] State Impact. (September 2013). Restoring Power: What Houston Learned from Ike. https://stateimpact.npr.org/texas/2013/09/12/restoring-power-what-houston-learned-from-ike

access to large trucks and boats, including an ad hoc volunteer group of private boat owners known as the Cajun Navy. Neighborhoods in the Memorial and Energy Corridor area in West Houston, which is downstream from the Addicks and Barker reservoirs, remained under water for almost two weeks. Homes in these neighborhoods had flood water levels of 5 feet and over as water was released from the dams downstream into Buffalo Bayou over a period of several days.

An estimated 29 percent of the city's population was likely affected by Hurricane Harvey through damage to their homes from floodwaters. Over 24,000 families were displaced from their homes according to estimates of FEMA-funded hotel room statistics[41]. This number vastly under-represents the actual number of families displaced, as many people found shelter with family or in local shelters in religious community centers, rented units or recreational vehicles. It also excludes people who did not or could not seek FEMA's help. The days after the storm saw an estimated 37,000 people sheltering in over 270 Red Cross and partner facilities in Houston. There were 11,000 people sheltering at the George R Brown Convention Center alone[42].

After the flooding subsided, the massive cleanup began. The City and its contractors removed over 2 million cubic yards of debris from gutted homes, buildings and ravaged neighborhoods, which is the amount that would fill 622 Olympic size swimming pools. Houstonians, as well as people from around the country, donated supplies and volunteer time to assist with short-term recovery efforts. The City and nonprofit organizations used Crisis Cleanup, an online collaborative disaster work order management platform, to coordinate volunteer efforts, assisting thousands of residents with cleaning out their homes to prevent mold and other indoor hazards.

Harvey's impact is not limited to loss of life, property and infrastructure. There has been loss of economic activity and disruption to schools. The Houston Independent School district suffered damage to several schools, some of which had to close for the year, affecting 6,500 students. As floodwaters have receded, concerns about environmental impact of damaged petrochemical plants to the air and water quality in the city have also emerged.

The city of Houston is located in the HUD-identified most impacted and distressed areas (Harris County, Fort Bend County, and Montgomery County).

The following figure shows flooding above 1 foot in Houston during Hurricane Harvey.

[41]Kinder Institute of Urban Studies, (December 2017). What's Next for Houston After Harvey? https://kinder.rice.edu/2018/01/08/whats-next-for-houston-after-harvey

[42] Fox News. (August 2017). Tropical Storm Harvey Evacuees Surge to Houston Shelter. http://www.foxnews.com/us/2017/08/30/houston-shelters-including-sports-stadiums-mosques-swell-with-harvey-evacuees.html

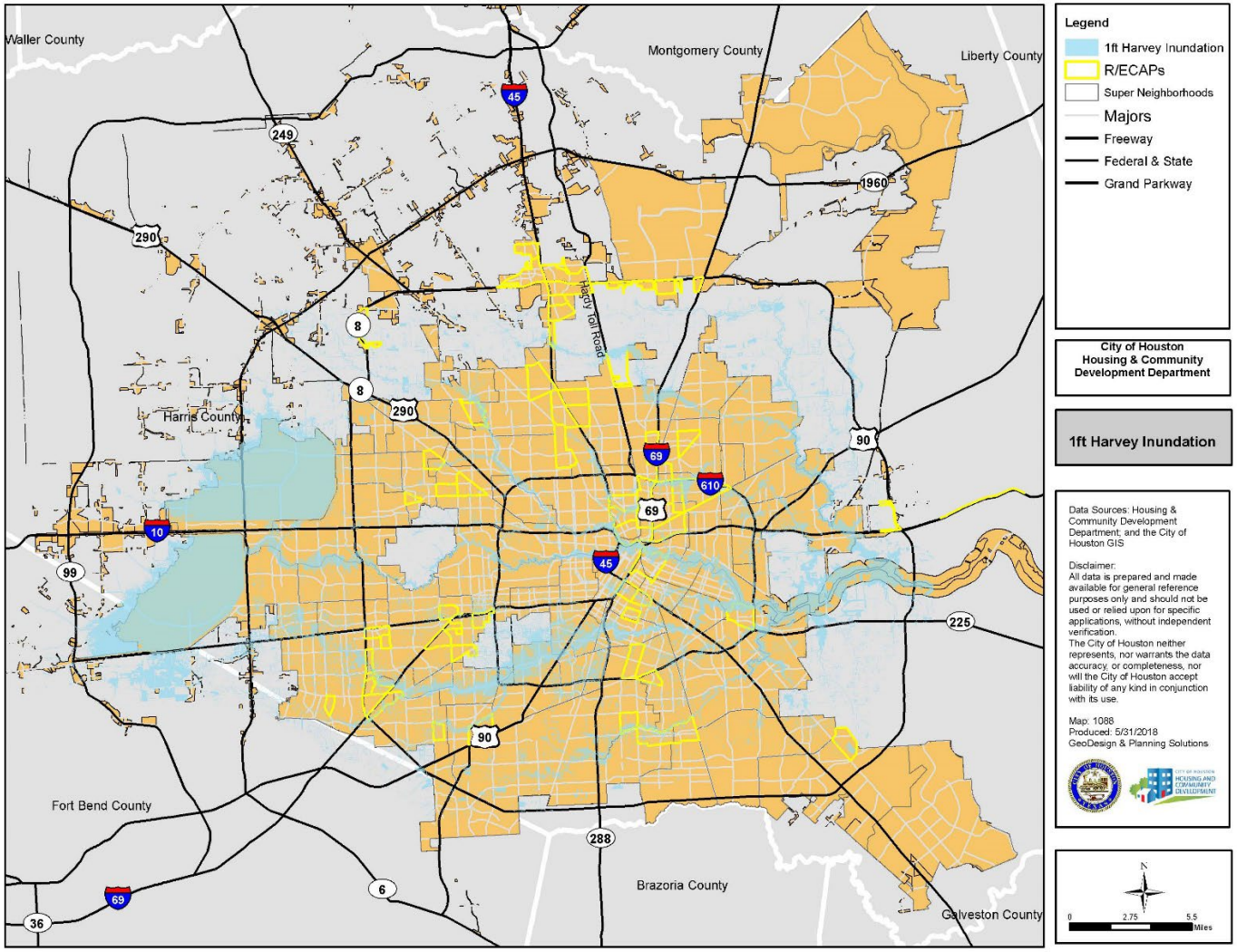


Figure 41: Hurricane Harvey 1-Foot Inundation Map

C. Demographic Profile of Impacted Counties

Houston has a population of 2.2 million and is part of the fastest growing and most ethnically and culturally diverse metropolitan area in the country [43]. Houston comprises more than one fourth of the combined population of the 49 CDBG-DR Eligible Counties. The median household income for Houston is lower than Texas, but the median rent and median value of owner-occupied units is almost equal to Texas. This combination of low-incomes and high housing costs mean that housing affordability is an even greater challenge for Houston than other areas in the state.

According to the 2016 ACS estimates, over 22 percent of the population is African American, almost 7 percent is Asian, 58 percent is White, and 12 percent is two or more races or some other race. Close to 45 percent of Houston's population is Hispanic or Latino. The population identifying as Hispanic or Latino/a are the racial/ethnic majority in Houston, which differs from the State and combined 49 Eligible Counties.

Houston's population is changing and almost one third of Houston's residents are immigrants. An estimated 14 percent of all households, or 116,473 households, in Houston have limited English proficiency. This means that these residents face a language barrier and may require additional support during the recovery process. They may also have not been able to apply for immediate assistance from FEMA and therefore, may not be represented in the FEMA IA data, which is used in this document to determine housing needs in Houston.

Approximately 22 percent of adults in Houston lack a high school diploma, which is much higher than the percentage of adults in Texas who lack a high school diploma. The median household income in Houston is $47,010. Poverty is defined each year by the U.S. Department of Health and Human Services; in 2017, families of four making below $24,600 in the 48 contiguous states were identified as in poverty. Nearly 22 percent of people live below the poverty line in Houston compared to only 16 percent in the state.

The following table provides a summary of the demographic and housing information in Houston in comparison with demographic and housing information from Texas.

[43] Kinder Institute of Urban Studies, (2018). The 2018 Kinder Houston Area Survey. https://kinder.rice.edu/sites/g/files/bxs1676/f/documents/Kinder%20Houston%20Area%20Survey%202018.pdf

Table 33: 2016 Demographic Statistics for Texas and Houston from the U.S. Census Bureau

	Texas	City of Houston	
Fact	**Estimates**	**Estimates**	**Percent of Area**
Population, 2016	27,862,596	2,240,582	8% of Texas Population
Population, percent change – April 1, 2010, (estimates base) to July 1, 2016	10.80%	7%	
Persons under 5 years, percent, 2016	7.20%	175,167	7.8% of City
Persons under 18 years, percent, 2016	26.20%	567,297	25.3%
Persons 65 years and over, percent, 2016	12.00%	219,012	10.0%
White alone, percent, 2016	79.40%	1,305,482	58.3%
Black or African American alone, percent, 2016	12.60%	511,398	22.8%
American Indian and Alaska Native alone, percent, 2016	1.00%	8,047	0.4%
Asian alone, percent, 2016	4.80%	149,265	6.7%
Native Hawaiian and Other Pacific Islander alone, percent, 2016	0.10%	1,256	0.1%
Two or More Races, percent, 2016	1.90%	44,986	2.0%
Hispanic or Latino, percent, 2016	39.10%	992,886	44.3%
White alone, not Hispanic or Latino, percent, 2016	42.60%	562,237	25.1%
Housing units, 2016	10,753,629	937,245	
Owner-occupied housing unit rate, 2012-2016	61.90%	359,118	38.0% of Housing Unit
Median value of owner-occupied housing units, 2012-2016	$142,700	$140,300	

	Texas	City of Houston	
Fact	**Estimates**	**Estimates**	**Percent of Area**
Median gross rent, 2012-2016	$911	$898	
With a disability, under age 65 years, percent, 2012-2016	8.10%	136,693	6.0%
Median household income (in 2016 dollars), 2012-2016	$54,727	$47,010	
Median household income for owner-occupied units (in 2016 dollars), 2012-2016	$70,980	$71,418	
Median household income for renter-occupied units (in 2016 dollars), 2012-2016	$36,330	$35,250	
Persons in poverty, percent	15.60%		21.9%
Cost burdened owner-occupied units, 2012-2016	21.17%	84,246	23.46% of owner-occupied units
Cost burdened renter-occupied units, 2012-2016	44.35%	223,952	47.44% of renter-occupied units
Land area in square miles, 2010	261,231.71	600	6.7% of Metro Area

Source: City of Houston from ACS 2012-2016.

D. Low- and Moderate-Income Analysis

The following map identifies census block groups that have a LMI population of 51 percent or more in the City of Houston using HUD's 2017 LMISD. It also shows the Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs), defined by HUD as census tracts where more than half the population is non-White and 40 percent or more of the population is in poverty.

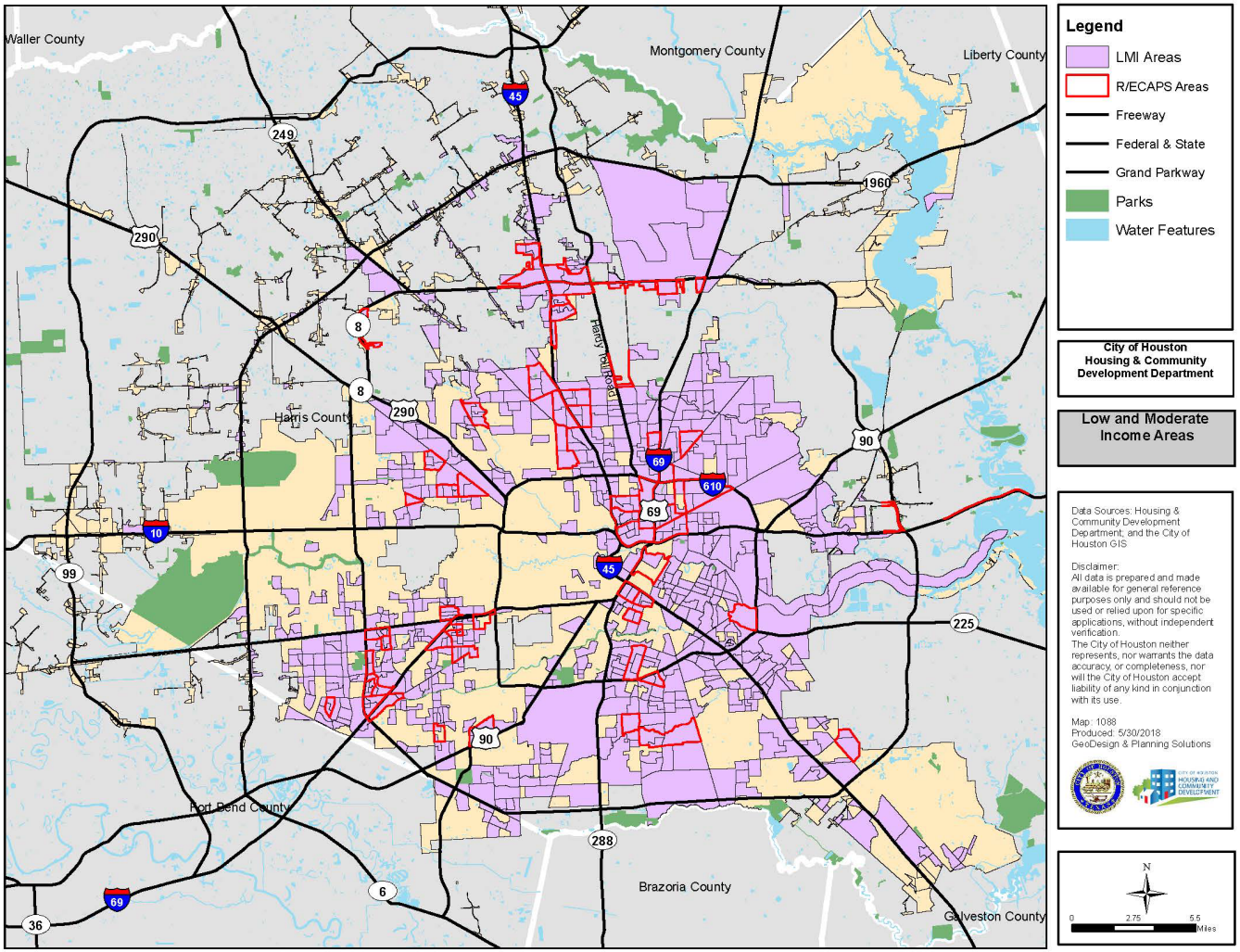


Figure 42: Percentage of LMI Population by Block Group with R/ECAPs

E. Social Vulnerability Index

The following map of the City of Houston identifies the communities that will most likely need support before, during, and after a hazardous event, as determined by the SoVI. This index, developed by the University of South Carolina's Hazards and Vulnerability Research Institute, synthesizes 29 socioeconomic variables that contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. Census tracts that rank in the top 80 percent nationally are communities marked as having a "High" social vulnerability. In Houston, areas with high vulnerability somewhat correspond with LMI areas and areas that are predominately minority, including R/ECAPs.

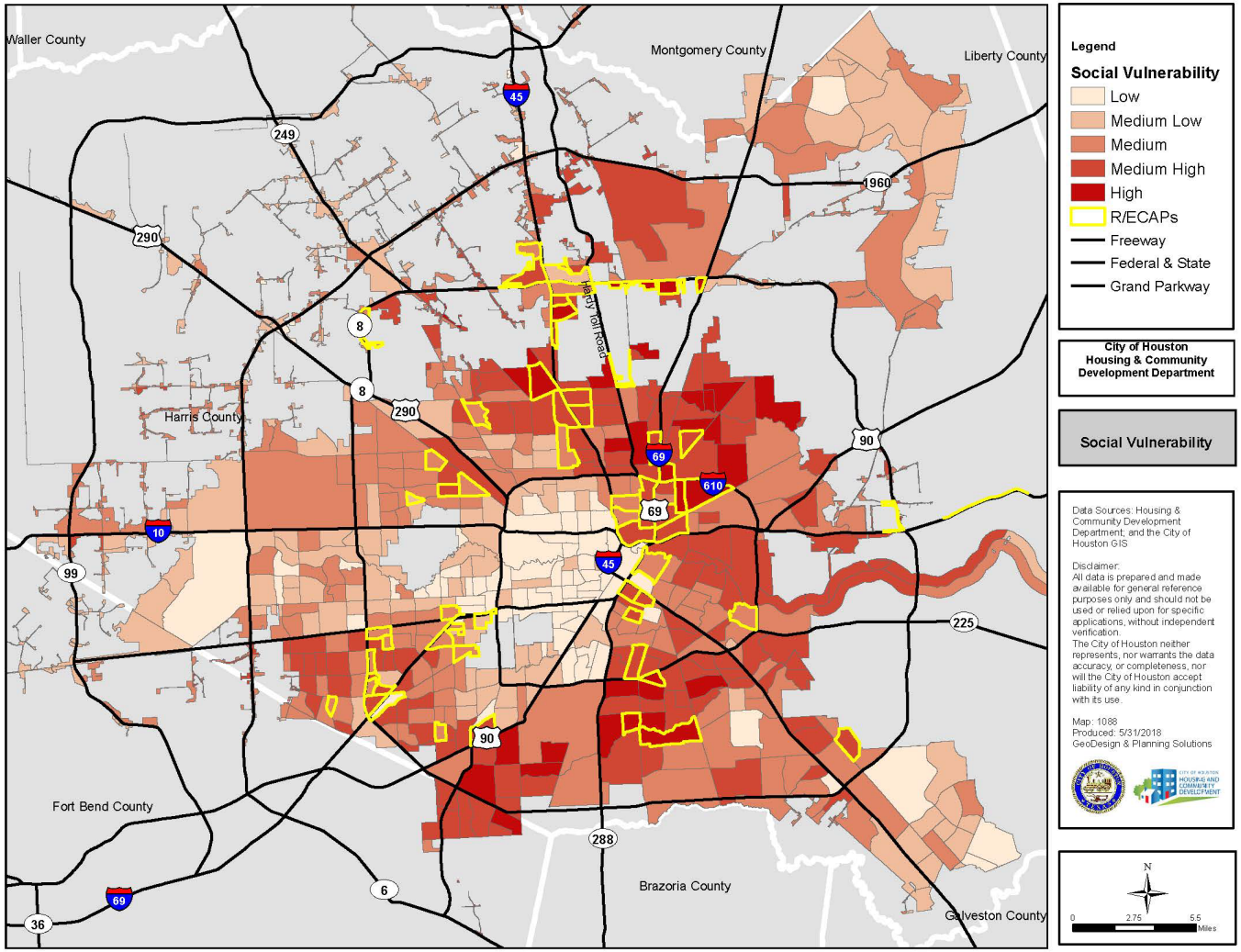


Figure 43: SoVI with R/ECAPs for City of Houston

F. Housing Impact

1. Real Estate Market

One of the strongest areas of the Houston economy is the real estate sector. Total property sales have been increasing steadily in recent years. According to the ACS, there are over 930,000 housing units in Houston with a homeowner vacancy rate of 1.9 and a rental vacancy rate of 7.7. The median price for an owner-occupied home is $140,300. Hurricane Harvey caused home sales to fall somewhat in August 2017, however, the market rebounded immediately and saw increases in home sales from the same period the previous year [44]. According to the Texas A&M Real Estate Center, Houston continues to lead nationally in the number of permits issued for single family home building. In 2018, single family construction permits are estimated to increase by 14 percent. The average annual growth rate of single family construction permits has been close to 6 percent from 1991 to 2017.

Despite having a strong market for residential homes, Houston is a majority renter city with almost 57 percent of Houstonians renting homes. The median gross rent is $898 and almost half of all renters are housing cost burdened, meaning over 30 percent of their household income is spent on housing. While home sales have been robust and over 99 percent of homes have complete plumbing and kitchen facilities, most of the housing stock in the city is aging. Over half (56 percent) of all the homes in Houston were built before 1979. That is a significantly large percentage compared to the housing stock in the rest of the state, where approximately 41 percent of the homes are built before 1979.

The demand for housing, especially affordable homes, in Houston was high even before Hurricane Harvey impacted the city. Since Hurricane Harvey, the housing supply has decreased due to uninhabitable, flooded homes. This, in turn, has further decreased the already limited supply of affordable homes as a growing number of renters and buyers compete for a reduced supply of units.

Over half of the 830,000 households were housing cost burdened in the years leading up to Harvey. [45] This number is expected to rise even higher in 2018 as a result of Harvey's impact on housing affordability in Houston. Renters in Houston are far more cost burdened than owners – 23 percent of owner-occupied housing units have cost burdened residents whereas 47 percent of renter-occupied housing units have cost burdened residents. A person is considered housing cost burdened when they spend more than 30 percent of their income on housing expenditures such as rent or mortgage.

The decreasing number of available units and heightened demand means that the gap between the supply of and demand for housing is greater than it was prior to Hurricane Harvey.

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[44] Greater Houston Partnership Research, (2017). Houston Economic Highlights. http://www.houston.org/assets/pdf/economy/Economic-Highlights-2017-web.pdf

[45] Houston Chronicle, February (2017). Putting numbers on Houston's demand for more affordable housing. https://www.chron.com/business/texanomics/article/Putting-a-number-on-Houston-s-affordable-housing-10945884.php

The Houston metro area also has a higher square footage per housing unit than the state. According to U.S. Census, American Housing Survey (AHS), 2015, the Houston-The Woodlands-Sugar Land, MSA has a higher median square footage per housing unit than Texas, with a median square footage of 1,800 for the Houston MSA compared to the median of 1,600 square feet for Texas. According to the AHS, 35 percent of homes in the Houston MSA are 2,000 square feet or more, compared to 28 percent of Texas homes. With a larger proportion of homes having higher square footage in the Houston MSA, it is anticipated that repair costs per unit will likewise be higher in the Houston MSA than the remainder of the state.

Neighborhoods of all incomes and housing values have been affected by flooding because of Hurricane Harvey. Many homes in the Memorial and Briar Forest Super Neighborhoods, that have higher square footage and median home value compared to the city's and state's average, were impacted by severe flooding for weeks after the storm, as water was released from Barker and Addicks reservoirs into Buffalo Bayou. Both renter- and owner-occupied homes in the area were impacted by floodwaters as high as 6 feet for over two weeks. According to the Houston Planning and Development Department, in 2015, the median housing value in Briar Forest was $222,903 and in Memorial it was $366,629; both median values were much higher than the city's median value, at $131,700. In addition, with amendments to Chapter 19 of the Code of Ordinances, which includes the City's Floodplain Ordinance, many homes in need of minor repairs from flood damage may now need more extensive repairs related to elevation to comply with the new regulations. While most of these homes will not need to be reconstructed, they will need extensive repair, which will be more expensive due to the larger size and higher median value of these homes compared to the rest of the city and state.

2. Homelessness

The City of Houston has been working to reduce homelessness over the past several years. The City has utilized various sources of funds to undertake programs that help vulnerable populations at risk of becoming homeless and persons who are homeless and need shelter and public services. Recently, the City has partnered with HHA to administer a tenant based rental assistance program funded by the HOME program, which has helped households at risk of becoming homeless stay in their homes. Several public service activities, such as health care services for the homeless, day shelter programs, and other homeless shelter programs funded through CDBGs, have helped provide homeless persons access to shelter and needed services. The City continues to utilize the Emergency Solutions Grant (ESG) to fund housing relocation and stabilization services for rapid-rehousing, prevent homelessness through providing rent and utilities assistance, and provide emergency shelter services.

Along with HOME, CDBG, and ESG funds, Houston has also utilized the Housing Opportunity for Persons with AIDS (HOPWA) and HHSP Program funds to help homeless persons and families and those at risk of becoming homeless through rental assistance, housing placement and shelter services, and healthcare services. Since 2012, the City has worked closely with community partners to create and provide permanent supportive housing.

The Coalition for the Homeless of Houston/Harris County (Coalition) provides leadership in the development, advocacy, and coordination of community strategies to prevent and end

homelessness. It also serves as the lead agency for the Houston/Harris County Continuum of Care and conducts a PIT Count of sheltered and unsheltered persons experiencing homelessness in Houston, Harris County, Fort Bend County, and Montgomery County area once a year over a three-day period. The purpose of the PIT Count is to determine the number of persons experiencing homelessness, as defined by HUD.

From 2011 to 2017, the number of sheltered and unsheltered homeless persons in Houston, Harris County, and Fort Bend County decreased by 60 percent, from 8,538 to 3,412 persons, according to the Coalition. In addition, unsheltered chronic homelessness decreased by 82 percent. In 2017, 39 percent of the unsheltered homeless individuals had a high school diploma or GED; 21 percent had some college or a college degree or higher; 25 percent of unsheltered homeless individuals reported no income; and 20 percent reported panhandling for income.

On May 23, 2018, the Coalition released the PIT Count for 2018. It shows the number of homeless has increased by 15 percent in one year, from 3,605 to 4,143 persons. While the PIT counts have increased in the Gulf Coast region and other areas in Texas between 2017 and 2018 counts, the increase has been the highest in the Houston region. This increase in the number of homeless persons in the Houston area is assumed to be a direct impact of Hurricane Harvey. Almost one in five (18 percent) of unsheltered homeless individuals reported Hurricane Harvey as their reason for being homeless. It is important to note that the homeless count does not take into consideration those living in a temporary housing situation, such as staying with family or friends. The homeless count likely underestimates the total number of homeless persons.

Although few units of homeless housing were damaged due to Hurricane Harvey, there is a great need for additional resources for homeless housing and services since the disaster. First, the number of homeless persons has increased for the first time in seven years, as seen in the PIT Count. Second, some families and individuals who found temporary housing, such as those living with family or friends after Hurricane Harvey, are at risk of becoming homeless over the next year as their temporary housing becomes unavailable or inadequate. Finally, the housing market has tightened, leaving even fewer units than before available as housing for the homeless or those at-risk of becoming homeless.

3. Social Services: 2-1-1 Texas Program

The United Way of Greater Houston operates the 2-1-1 helpline for the area. Between August 28 and October 10, 2017, 136,000 residents called 2-1-1, and a total of 51,596 unique callers requested service referrals due to the impact of Hurricane Harvey. [46] The month after the storm had the greatest number of calls with 21,233 in the first week declining to 1,801 for a week about one and a half months after the storm. Most calls requested referrals or information for D-SNAP and other food assistance, temporary financial aid, shelter, and disaster unemployment assistance.

[46] Kinder Institute Research, (November 2017). Map: 211 Calls During and After Harvey. https://kinder.rice.edu/2017/11/09/map-211-calls-during-and-after-harvey/

4. Interim Housing Assistance

In the months after Hurricane Harvey, the city of Houston has managed three Direct Housing Assistance Programs (DHAP) designed to provide temporary relief to impacted residents while they determine ways to fully repair their homes. These programs are funded by FEMA and administered by the State of Texas. As a subrecipient of FEMA, Houston manages the DHAPs in Houston. Eligible households include those registered with FEMA and have a FEMA-verified loss of at least $17,000. These programs help provide safe, sanitary, and secure housing to residents who qualify for the programs. All three programs end on February 25, 2019, at which time applicants can no longer benefit from them.

The Direct Assistance for Limited Home Repair Program provides home repair to eligible, impacted residents and has benefitted approximately 185 households. The Manufactured Home Units and Recreational Vehicles Program and the Direct Lease Program provide alternate housing options while the residents are repairing their homes and has benefitted approximately 113 households.

5. Insurance

TDI made a presentation to the Texas Senate Business and Commerce Committee in January 2018 about insurance and Hurricane Harvey. TDI compiled information from private insurers, TWIA, and the Texas FAIR Plan Association (TFPA) for all personal and commercial lines of insurance, but this information was reported only by county. Although the City of Houston is in Harris, Fort Bend, and Montgomery counties, the majority of Houston's 2.2 million residents reside in Harris County. In this section, Harris County, including Houston, is used to represent the need in Houston, in the absence of Houston only information.

The following table includes information about Hurricane Harvey insurance claims in Harris County. Personal lines include homeowner's insurance, residential dwelling insurance, mobile homeowner's insurance, and personal automobile insurance. Other lines include other types of insurance like business, commercial, and crop insurance.

Table 34: Hurricane Harvey Insurance Claims for Harris County including Houston

	Number of Claims	Amount of Losses Paid	Amount of Losses Incurred
Personal Line of Insurance	234,168	$1,136,071,404	$1,556,882,087
Other Lines of Insurance	49,461	$1,000,655,816	$4,002,476,765

TFPA provides limited coverage for one- and two-family residential dwellings, townhouse units, and condominium units that meet certain underwriting standards. TFPA provides residential property insurance to Texas residents in areas designated by the Commissioner of Insurance as underserved. TFPA policy counts grew 12 percent annual from 2010 to mid-2015, especially in the greater Houston area, as insurance companies reevaluated their exposure to catastrophes.

The following TFPA information from May 2018 is a subset of the information reported from TDI. The total indemnity payments in Houston related to Hurricane Harvey, which are the losses paid or expected to be paid directly to an insured for first-party coverages, totaled over $14 million. Paid expenses, which are expenses of adjusting claims that cannot be charged against specific claims, totaled over $8 million. The average paid claim was $1,106 in Houston.

Table 35: TFPA Claims in the City of Houston Related to Hurricane Harvey

	New Claims	Closed Claims	Open Inventory	Percent Closed	Paid Indemnity	Paid Expense	Average Paid
Houston	8,221	8,121	100	99%	$14,857,961	$8,345,920	$1,106

Insurance is one way that many households begin to recover from a disaster. But many Houstonians don't have insurance, and those that do may not have filed a claim or closed the claim without payment because the damage fell below the deductible or the damage was not covered by the policy.

6. National Flood Insurance Program

The following information was provided to Houston by FEMA in May 2018. Similar to the statewide NFIP claims, there was an increase in NFIP claims in Houston as a direct result of Hurricane Harvey. More than 882 (3 percent) of claims remained active/open with more than 21,374 (83 percent) claims closed. There are approximately 3,419 (13 percent) of claims that are closed without payment. The total assessed damage for NFIP claims was more than $2.957 billion. In total, more than $2.743 billion has been paid out on claims made during August to December 2017 with the average of all payments being $107,359.

Table 36: NFIP Claims Filed in Houston by Date of Loss – City of Houston

	August	September	October	November	December	Total
Claims with RL	6,609	61	4	0	0	6,674
Total Claims	25,515	351	17	6	7	25,896

7. Texas Windstorm Insurance Association

For Houston, the impacts from Harvey were mostly from flooding, and because the wind intensity had subsided after Hurricane Harvey hit the coast of Texas, only a minimal number of households had damage due to wind. There were no TWIA claims in the City of Houston, as Houston falls outside of the coverage area.

8. Small Business Assistance Disaster Home Loans

Homeowners and renters whose property was damaged by a declared disaster can apply for a Small Business Assistance (SBA) low-interest, disaster related home loan. The GLO provided SBA Disaster Home Loan data from January 28, 2018 to the City of Houston in May 2018. For the damaged properties in Houston, the total approved loan amount was $718,372,700, and the total amount of applicants' verified loss was $1,541,774,861.

9. Public Housing Authority Data

HHA provided the following information to the City of Houston in May 2018. Hurricane Harvey damaged approximately 18 percent of units owned by HHA. The following tables give details of Hurricane Harvey's impact to HHA properties.

Table 37: HHA Public Housing Damages

Public Housing	Total Number of Units	Number and Type of Units		Number of Damaged Units	Type of Damages in Damaged Units		Type of Damages in Common Areas/ Office/ Other	
		Public Housing	Tax Credit/ Market		Flood	Leaks	Flood	Leaks
Clayton Homes	296	296	0	112	112	0	0	0
Forest Green	100	100	0	84	84	0	1	1
Irvinton Village	318	318	0	23	10	13	0	0
Allen Parkway Village/HOA PV	500	500	0	80	0	80	1	4
Historic Rental Initiative	40	40	0	1	0	1	0	0
Bellerive	210	210	0	0	0	0	0	0
Cuney Homes	553	553	0	18	0	18	0	9
Ewing Apartments	40	40	0	0	0	0	0	0
Fulton Village	108	108	0	38	0	38	0	0
Heatherbrook	176	53	123	27	0	27	0	0
Kelly Village	270	270	0	0	0	0	0	1
Kennedy Place	108	108	0	17	0	17	0	2
Lincoln Park	250	200	50	27	0	27	0	0
Lyerly	199	199	0	0	0	0	0	0
Oxford Place	250	230	20	16	0	16	0	0
Victory	100	100	0	27	0	27	0	0
Total	**3,518**	**3,325**	**193**	**470**	**206**	**264**	**2**	**17**

Table 38: HHA Damages to Tax Credit Properties

Tax Credit Property	Total Number of Units	Number of Damaged Units	Type of Damages in Damaged Units		Type of Damages in Common Areas/Office/Other	
			Flood	Leaks	Flood	Leaks
2100 Memorial	197	197	0	TBD	1	0
Mansions at Turkey Creek	252	71	44	27	5	1
Sweetwater	260	73	0	73	0	0
Uvalde Ranch	244	74	74	0	1	0
Peninsula Park	280	52	0	52	0	0
Pinnacle	250	0	0	0	0	0
Villas at Winkler	234	172	0	172	0	0
Willow Park	260	0	0	8	0	0
Total	**1,977**	**6399**	**118**	**332**	**7**	**1**

Table 39: HHA Damages to Project Based Voucher Properties

PBV Property	Total Number of Units	Number of Damaged Units	Type of Damages in Damaged Units	
			Flood	Leaks
Long Drive	100	12	0	12
Telephone Road	200	0	0	0
Total	**300**	**12**	**0**	**12**

In summary, HHA had a total of 1,121 damaged units, and 392 families using tenant-based vouchers were displaced from their homes. After Hurricane Harvey, HHA inspected 910 housing units in the Housing Choice Voucher Program of which 392 units, or 47 percent of the housing units in the Housing Voucher Choice Program, failed inspection and the family had to move out. Furthermore, HHA has paid over $1.2 million on 268 units at 17 properties for Housing for Harvey, a collaboration between the City, Harris County, and other partners to provide non-congregate shelter for Harvey impacted families. Due to the strain put on the Voucher Program, the housing authorities from Oklahoma City, Oklahoma, and Cambridge, Massachusetts have helped Houston by lending vouchers to Harvey-impacted families.

Table 40: Summary of HHA Current Damage Assessments

	Number of Displaced Families	Number of Units Damaged
Public Housing	206	470
Tax Credit	118	639
Multifamily Project Based Voucher	0	12
Tenant Based Voucher Families Displaced	392	392
Total	**716**	**1,513**

Besides damage to living quarters, many properties also had extensive damage to common areas and non-residential buildings (administrative, maintenance, etc.), which are essential to the functioning of a housing development. Total estimated amount of damages for HHA alone is about $50 million. Damage to many units and buildings are extensive and will require reconstruction. Therefore, the unmet need estimates for repair underestimates the real need of rebuilding housing units that have been damaged repeatedly over the past several years.

Table 41: Estimated Repair Cost of HHA Public Housing Units

Property	Estimated Repair Cost
APV/HOAPV	$464,000.00
Bellerive	$5,000.00
Clayton Homes	$14,445,300.00
Cuney Homes	$55,000.00
Forest Green	$3,972,146.75
Fulton Village	$185,000.00
Heatherbrook	$288,500.00
Historic Oaks	$250,000.00
HHA	$516,000.00
Irvinton Village	$1,936,000.00
Kennedy Place	$125,000.00
Lincoln Park	$160,000.00
Oxford Place	$85,000.00
Sweetwater Point	$1,399,500.00
Victory Place	$40,000.00
Total	**$23,926,446.75**

Table 42: Estimated Repair Cost of HHA Tax Credit/Project Based Voucher Units

Property	Estimated Repair Cost
2100 Memorial	$16,013,400.00
Long Drive	$63,860.00
Mansions at Turkey Creek	$3,644,500.00
Peninsula Park	$59,500.00
Pinnacle on Wilcrest	$11,500.00
Telephone Road	$12,000.00
Uvalde Ranch	$3,257,000.00
Villas on Winkler	$2,383,500.00
Willow Park	$15,595.00
Total	**$25,460,855.00**

HHA has applied for FEMA PA in the amount of the damages illustrated above. The following calculation, prescribed by the GLO, shows the need for HHA.

Table 43: PA Total Cost and Need for HHA

PA Category (HHA)	Approx. PA Cost	10 percent Local Match	15 percent Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)*
E – Buildings and Equipment	$49,387,302	$4,938,730	$7,408,095	$12,346,826
Total	**$49,387,302**	**$4,938,730**	**$7,408,095**	**$12,346,826**

*The total need in this table does not reflect the actual needs of HHA because it does not take into account severe damage to some HHA properties that now need demolition and reconstruction.

The need for HHA is much greater than just the repair costs due to Hurricane Harvey damage. In addition to the impacts from Hurricane Harvey, some of HHA's units were impacted by flooding events in 2015 and 2016, as well. This has depleted many developments' reserves for repair. Due to flooding impacts, some developments may need to be reconstructed to prevent future flooding. These costs have not been included above. The unmet needs of public housing will be prioritized, and further information will be detailed in program guidelines.

10. FEMA Individual Assistance

FEMA IA data from February 2, 2018, received from the GLO in May 2018, was used to quantify all housing applicants impacted by Hurricane Harvey. This information was then used to calculate the unmet needs for housing, based on the same methodology that the GLO used.

According to HUD, only the most impacted homes are to be included in calculations for unmet housing needs. Owner-occupied homes are determined to be most impacted if they have real property damage of $8,000 or more. Rental units are determined to be most impacted if they have personal property damage of $2,000 or more. The FVL amount was used as a proxy for real property damage and personal property damage, as the data received from the GLO was limited to the FVL. The following are the HUD determined categories of FEMA inspected most impacted homes.

Owner-occupied Homes
- Major-Low: $8,000 to $14,999 of FEMA verified loss
- Major-High: $15,000 to $28,800 of FEMA verified loss
- Severe: Greater than $28,800 of FEMA verified loss

Renter-occupied Homes
- Major-Low: $2,000 to $3,499 of FEMA verified loss
- Major-High: $3,500 to $7,499 of FEMA verified loss
- Severe: Greater than $7,500 of FEMA verified loss

To calculate the unmet housing need, the number of housing units determined as the most impacted are multiplied by the multiplier amount corresponding to that category. Houston used multipliers provided by HUD. These multipliers were determined using SBA estimated median repair costs in each of the Major-Low, Major-High, and Severe categories less assumed assistance from FEMA and SBA.

Table 44: Unmet Need Multiplier by Damage Category

Category	Multiplier Amount
Major-Low	$58,956
Major-High	$72,961
Severe	$102,046

Approximately 258,437 applicants in Houston applied to FEMA for assistance. This is approximately 28.8 percent of the total applicants for FEMA assistance in Texas. Almost 20 percent of all owner applicants in Texas were in Houston, and almost 38 percent of all the renter applicants in Texas were in Houston. Of the total number of applicants in Houston, 75,887 had a FVL over $0, which is 26 percent of those applicants with FVL over $0 in Texas.

The total number of owner-occupied applicants in Houston with over $8,000 in FVL is 22,476. The total number of renter applicants in Houston with over $2,000 in FVL is 14,878. Over half (51 percent) of the owner applicants received a FVL over $0, which is much higher than the number of renter applicants receiving a FVL over $0, at only 18 percent. This may indicate that renter needs are under-represented in FEMA IA estimates.

Table 45: Total IA Applications in the City of Houston

Occupancy Type	Total Applications	FVL Over $0	Applicants with Unmet Need
Owner	88,282	45,084	22,476
Renter	168,723	30,765	14,878
N/A	1,432	28	0
Total	**258,437**	**75,877**	**37,354**

a. Total Unmet Need

The following table provides a breakdown of total unmet needs for owner- and renter-occupied households using GLO's methodology to calculate unmet need. It provides the damage category and the total count of unmet need for those three categories as previously defined.

Table 46: Category of Unmet Needs by Owner-Occupied and Renters for City of Houston

Damage Category/ Multiplier	Total Count	Total Owner-Occupied and Rental Unmet Needs	Owner-Occupied Count	Total Owner-Occupied Unmet Need	Rental Count	Total Rental Unmet Needs
Major-Low: $58,956	12,598	$742,727,688	7,392	$435,802,752	5,206	$306,924,936
Major-High: $72,961	18,364	$1,339,855,741	10,370	$756,605,570	7,994	$583,250,234
Severe: $102,046	6,392	$652,278,032	4,714	$481,044,844	1,678	$171,233,188
Total	**37,354**	**$2,734,862,524**	**22,476**	**$1,673,453,166**	**14,878**	**$1,061,408,358**

As defined by the table, the owner-occupied unmet need in dollars is $1.67 billion (61 percent) and the renter unmet need is $1.06 billion (39 percent), resulting in a total unmet need of $2.73 billion.

Approximately 49 percent of the unmet need population is in the LMI category. The unmet need for the LMI population is over $1.3 billion. The unmet need by income category for Houston applicants can be seen in the following table.

Table 47: Unmet Need by Income Category/Owner-Occupied and Renter for City of Houston

Income Category	Count	Unmet Need	Percent of Count	Percent of Unmet Need
0-30%	8,723	$619,561,377	23%	23%
31-50%	4,575	$322,882,375	12%	12%
51-80%	5,480	$388,017,580	15%	14%
Above 80%	12,964	$987,774,019	35%	36%
Not Reported	5,612	$416,632,607	15%	15%
Total	**37,354**	**$2,734,861,524**	**100%**	**100%**

b. Owner Occupied Unmet Need

Approximately 35 percent of the owner-occupied unmet need is in the LMI category. For owners, the unmet need for the LMI population is over $596 million. The unmet need by income category for owner-occupied households for Houston can be seen in the following table.

Table 48: Owner Unmet Need by Income Category for City of Houston

Income Category	Count	Unmet Need	Percent of Count	Percent of Unmet Need
0-30%	3,194	$222,356,274	14%	13%
31-50%	2,230	$156,016,730	10%	9%
51-80%	3,095	$217,915,740	14%	13%
Above 80%	10,428	$806,736,918	46%	48%
Not Reported	3,529	$270,427,504	16%	16%
Total	**22,476**	**$1,673,453,166**	**100%**	**100%**

The following map shows this unmet need for owners in the City of Houston by census tract.

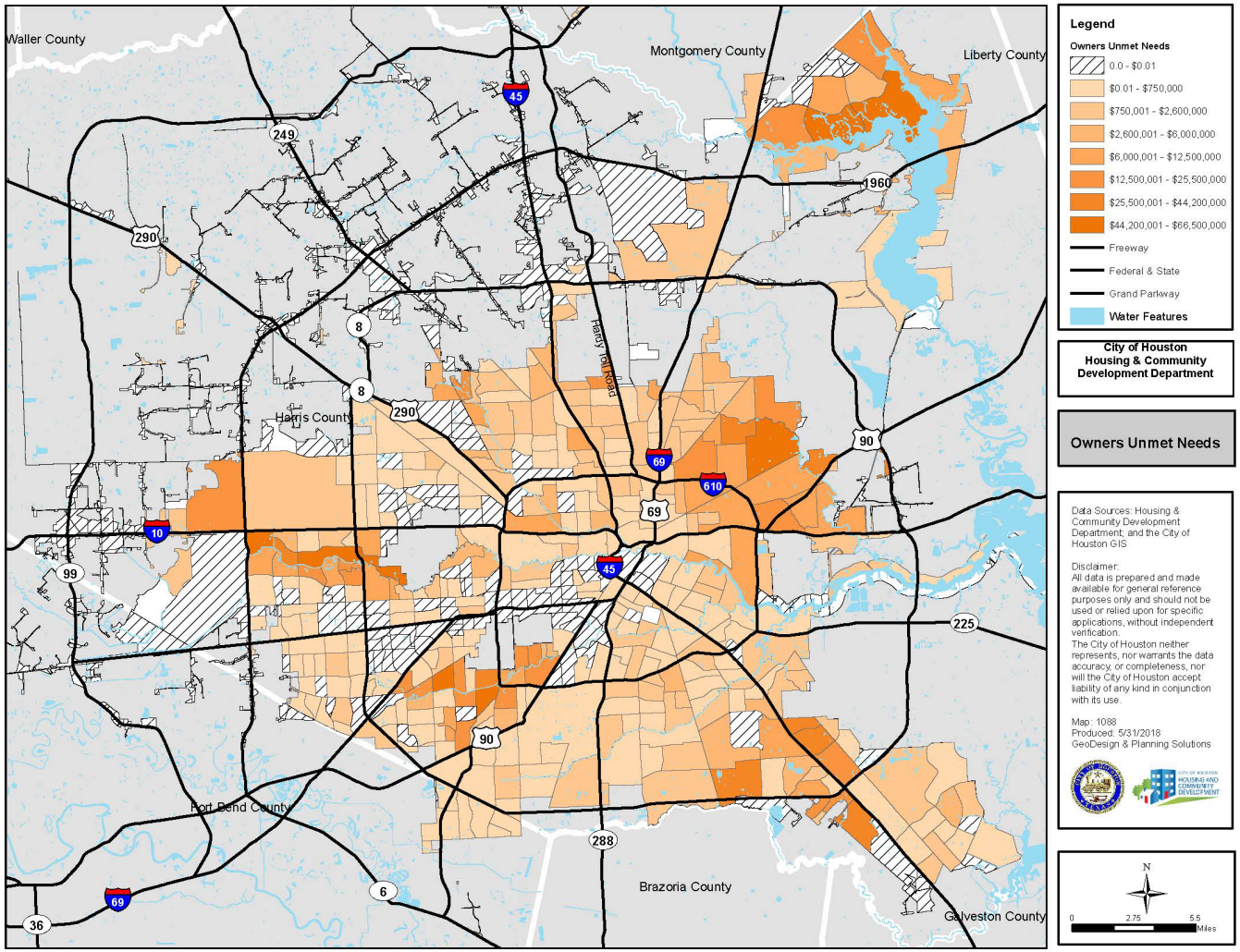


Figure 44: Owner Unmet Need by Income Category for City of Houston

c. Renter Occupied Unmet Need

The percentage of renter households within LMI categories was analyzed and approximately 69 percent of the unmet need is in the less than 80 percent LMI category. The unmet need for the LMI population is over $734 million for renters. The unmet need by income category for renters in Houston is illustrated in the following table.

Table 49: Renter Unmet Need by Income Category for City of Houston

Income Category	Count	Unmet Need	Percent of Count	Percent of Unmet Need
0-30%	5,529	$397,198,669	37%	37%
31-50%	2,345	$166,865,645	16%	16%
51-80%	2,385	$170,101,840	16%	16%
Above 80%	2,536	$181,037,101	17%	17%
Not Reported	2,083	$146,205,103	14%	14%
Total	**14,878**	**$1,061,408,358**	**100%**	**100%**

The following map shows this unmet need for renters in the City of Houston by census tract.

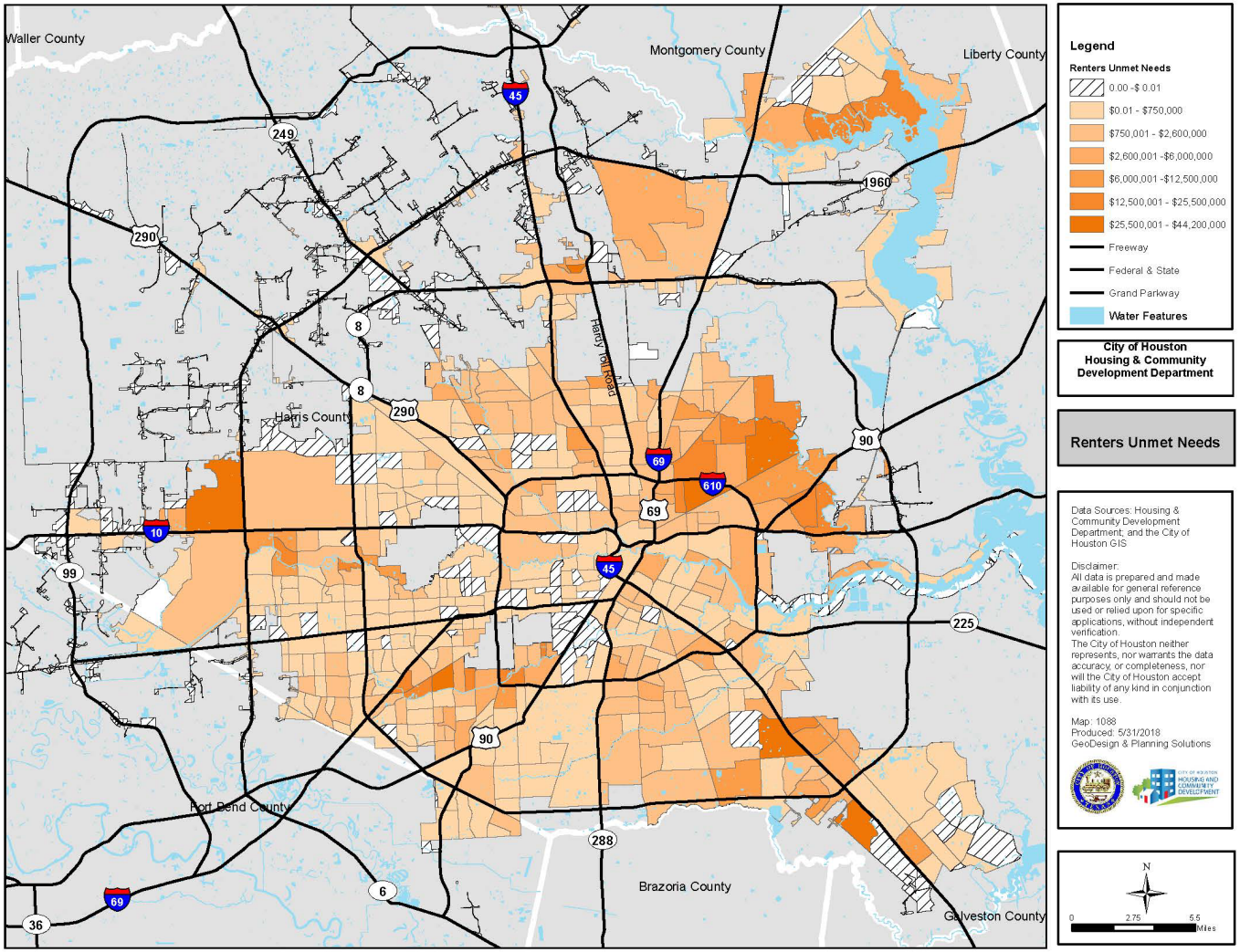


Figure 45: Renter Unmet Need by Income Category for City of Houston

d. Total Unmet Need Using HUD's Methodology

As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, grantees are prohibited from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if the combined households income is greater than 120 percent AMI or the national median, the property was located in a floodplain at the time of the disaster, and the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

HUD, through the Federal Register, indicates how to calculate unmet need for owners and renters. HUD specifies that owners have an unmet need if they have a real property flood value loss of $8,000 or greater and either 1) live outside of a floodplain without flood insurance or 2) live inside a floodplain without flood insurance and have a household income of less than 120 percent AMI. HUD identifies renters with an unmet need as those households with a personal property flood value loss of greater than $2,000 and have a household income less than 50 percent AMI. The dollar amounts used are for HUD's calculation of unmet need and do not impact eligibility of the program.

The following table provides a breakdown of owners in a floodplain with no flood insurance by income category. The number of FEMA IA applicants that show an unmet need totals 37,354. The total number of most impacted owners that are in a floodplain with no flood insurance totals 2,994 (8 percent). Most owners living in the floodplain without insurance are families making below 120 percent AMI, with the total number households above 120 percent AMI at 520 and the total of owners below 120 percent AMI at 1,980.

Table 50: Owners in a Floodplain with No Flood Insurance by Income Category

Income Category	Count	Unmet Need	Percent of Count	Percent of Unmet Need
0-30%	659	$47,052,274	22%	22%
31-50%	425	$30,405,015	14%	14%
51-80%	560	$40,055,395	19%	18%
81-120%	336	$24,031,081	11%	11%
Above 120%	520	$39,942,135	17%	18%
Not Reported	494	$37,423,554	17%	17%
Total	**2,994**	**$218,909,454**	**100%**	**100%**

11. City of Houston's Floodplain Management Office

The City of Houston's Floodplain Management Office is responsible for administering the provisions in the City's Floodplain Ordinance, which includes making determinations regarding substantially damaged buildings in the 100-year floodplain in the city limits of Houston. A home is considered substantially damaged when the cost to repair it is more than 50 percent of the market value of the home. As of May 2018, approximately 1,944 homes in Houston were considered substantially damaged.

The City will not issue permits for repairs to homes considered to be substantially damaged unless the owner demonstrates how the home will be in compliance with the City's Floodplain Ordinance. To comply, these homes must be elevated or reconstructed at a higher elevation. Although substantially damaged homes may have received assistance from FEMA or other sources, because there are additional requirements from the City, for safety reasons, there is an additional unmet need for these property owners who must elevate or rebuild, rather than just repair damages.

12. HCFCD Home Buyout Program

The HCFCD is a special purpose district that provides flood damage reduction projects in Harris County, including in the City of Houston. HCFCD administers a Home Buyout Program to reduce flood damages by purchasing and removing homes located several feet deep in the floodplain where flood damage reduction projects are not cost effective or beneficial. HCFCD has 24 Buyout Areas of Interest within the city limits of Houston, where homes are considered hopelessly deep in the floodplain. Once these homes are purchased, HCFCD will demolish the homes and keep the areas for flood mitigation. As of May 2018, there are 2,033 privately owned parcels within these 24 areas. Of these, there are 1,398 parcels with structures and 629 parcels are vacant lots. There is a need to purchase these parcels to remove these households from areas that are flooding hazards.

13. Summary of Housing Unmet Need

Based on the information in this section, the City of Houston is showing a need that is much more than the City's current allocation of CDBG-DR funds. The City is working with consultants to analyze more detailed data from a variety of sources. The analysis will be available at a later date and will be considered during the development of program guidelines.

G. Infrastructure Impact

Hurricane Harvey has impacted Houston's infrastructure and caused damage to water system facilities, roads, bridges, and parks. In addition to direct damage to infrastructure caused by flooding, aging or under-sized infrastructure can also lead to flooding in residential homes and other structures. Houston Public Works (HPW) has inspected various infrastructure systems in the city since Harvey and continues to monitor these systems and facilities for needed repairs. Additional assessments of the infrastructure system are planned in the future. These assessments will include mitigation needed to protect from damages caused by future flooding events and adaptation for future infrastructure.

Like the GLO, Houston has prioritized housing unmet need in this Action Plan. The City anticipates receiving additional federal funds in 2019, specifically additional CDBG-DR funds as referenced in Public Law 115-123, to address a variety of activities related to mitigation, which is anticipated to be used to address a variety of unmet needs including infrastructure.

1. FEMA Public Assistance

The FEMA PA data is the best available data set to determine infrastructure need after Hurricane Harvey. The City of Houston used the GLO's methodology to calculate infrastructure unmet need by adding the local match and resiliency cost of projects assisted through FEMA's PA. The Local Match is 10 percent of the approximate PA cost and Resiliency is 15 percent of the approximate PA cost. The following PA cost estimates and unmet need calculations are based on data from the FEMA Grants Portal Damage Inventory on December 4, 2017.

Table 51: Total Cost and Need by Public Assistance Category for City of Houston

PA Category (City of Houston)	Approx. PA Cost*	10 percent Local Match	15 percent Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)
A – Debris Removal	$259,459,255	$25,945,926	$38,918,888	$64,864,814
B – Emergency Protective Measures	$140,307,363	$14,030,736	$21,046,104	$35,076,840
C – Roads and Bridges	TBD	TBD	TBD	TBD
D – Water Control Facilities	TBD	TBD	TBD	TBD
E – Buildings and Equipment	$78,467,346	$7,846,735	$11,770,102	$19,616,837
F – Utilities	$80,560,302	$8,056,030	$12,084,045	$20,140,075
G – Parks, Recreational Facilities, and Other Items	$32,000,000	$3,200,000	$4,800,000	$8,000,000
Z – Direct Administrative Costs	TBD	TBD	TBD	TBD

*Costs based on 12/4/17 data for the FEMA Grants Portal Damage Inventory. Total PA Assistance is estimated to be $2.4 billion.

As of the end of May 2018, the City of Houston had received $163,016,399 from FEMA for two PA categories, A – Debris Removal and B – Emergency Protective Measures. It is anticipated that in the future the City of Houston will submit additional damages for FEMA PA grant assistance in the following categories: C – Roads and Bridges, D – Water Control Facilities, and Z – Direct Administrative Costs. It is estimated the total PA costs will be 2.4 billion. The total need in the PA category of $147,698,568 is an underestimation of the total infrastructure need in Houston.

The City has also received $100 million in insurance proceeds, which will be used to address damage to City owned buildings and assets caused by Hurricane Harvey. An apportionment and allocation methodology was submitted to FEMA on May 29, 2018, and upon approval, these proceeds will be used for City facility repairs and business interruption reimbursements. In addition, the City received a grant award from the Office of the Governor in the amount of $50 million. These funds are budgeted for local, non-federal cost share of debris removal cost for Category A FEMA PA for $25 million, the purchase of additional flood insurance for $10

million, and deductible payments on current insurance policy for damage to municipal property for $10 million.

2. Texas Hazard Mitigation Grant Program

The City of Houston has submitted Notice of Intents to the Texas HMGP for various mitigation projects with an estimated total cost of $703 million. These projects include constructing detention basins and diversion channels; reconstructing streets and utilities; removing structures from the floodplain through buyouts, elevations, and rebuilding; and dredging of waterways. The City will be submitting full applications for these projects soon. The HMGP provides assistance for 75 percent of the project cost and requires a local match for the remaining costs. This means that Houston will have to provide a match of or has an unmet need of approximately $175 million for infrastructure mitigation projects.

Table 52: Total Cost of HMGP Projects for City of Houston

	Cost	Funding Source	Unmet Need (25% Local Match)
Hazard Mitigation Projects	$703,000,000	FEMA-HMGP	$175,750,000

3. Summary of Infrastructure Unmet Need

The current estimated infrastructure unmet need for Houston, as calculated by the method suggested by GLO, is $198,448,568. This does not include all infrastructure unmet need in Houston related to Hurricane Harvey.

Houston's unmet infrastructure need also includes a variety of unfunded but needed infrastructure projects. This includes unfunded local drainage projects that are crucial to reducing damage from future flooding in Houston's neighborhoods. These projects are identified through a data-driven analysis of the storm water infrastructure in the city. These drainage projects are critical to improving storm water drainage systems in local neighborhoods and are one component to achieving resiliency in Houston's neighborhoods and reducing flood risks to homes and businesses.

In addition, the City of Houston is looking at ways to upgrade its infrastructure systems, and not just repair infrastructure that will likely get damaged again in a future flood event. One example is the wastewater consolidation projects, which will remove wastewater lift stations above ground and construct new underground infrastructure through gravity-fed pipes. Local communities want to remove damaged lift stations from their neighborhoods. These wastewater consolidation projects will not only help these neighborhoods eliminate lift stations from their surroundings but will also provide more resilient underground infrastructure.

The City continues to further assess its infrastructure and determine ways to incorporate mitigation and resilience strategies to protect the current infrastructure from and also adapt infrastructure to future flooding events.

H. Economic Impact

Houston's economy is the 6th largest in the country and is expected to double its current Gross Domestic Product (GDP) by 2040 with an estimated GDP growth rate of 3.1 percent [47]. According to the Texas Workforce Commission, the unemployment rate for the City of Houston in April 2018 was 4.2 percent. The industries that employ the greatest number of people are educational services, health care and social assistance (18.9 percent); professional, scientific, and management (14.4 percent); construction (10.2 percent); and retail trade (10.5 percent) followed by arts, entertainment and recreation (9.7 percent); manufacturing (8.6 percent); transportation and warehousing (5.6 percent); and other services (6.1 percent). Overall, Houston's economy was robust before Harvey and is expected to continue to remain strong through the recovery from Harvey.

Houston's economy was impacted by the recent energy industry downturn and by several flooding disasters, including Hurricane Harvey in 2017. Since the Houston metropolitan area is rapidly growing and the city has a robust economy, Hurricane Harvey is not expected to cause a major economic downturn in Houston. However, job creation, as reported in March 2018, has fallen below the long-term average for the month of March [48]. Even though the unemployment rate was lower than the rate from previous years at 4.1 percent after Harvey, the labor force has shrunk by 31,900 from May 2015 to February 2017 [49].

1. Employment

Most of Houston's employment growth in the past decade can be attributed to the following four sectors: health care and social assistance; leisure and hospitality; professional and business services; and trade, transportation, and utilities. Jobs in the health care sector and professional and business services sectors are well-paying but also require advanced degrees or specialized trainings that are usually out of reach for LMI individuals. Jobs in the leisure and hospitality sector and trade, transportation, and utilities sector do not necessarily require advanced degrees or specialized training but also have lower median wages. The impact on wages and employment in these sectors after Harvey is still under investigation. However, based on active claimants for unemployment benefits filed in October 2017, approximately 6,182 individuals lost their jobs and filed for unemployment benefits in the City of Houston. In January 2018, the number of active claimants for unemployment benefits was reduced to approximately 5,156.

2. Small Business Administration Business Disaster Loans

The GLO provided SBA business disaster loan data from January 28, 2018 to the City of Houston in May 2018. Businesses of all sizes as well as private, non-profit organizations, are

[47] Greater Houston Partnership, (2017). Houston's Economy. http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf

[48] Greater Houston Partnership, (May 2018). *The Economy at A Glance Houston*. http://www.houston.org/pdf/research/quickview/Economy_at_a_Glance.pdf

[49] Greater Houston Partnership, (December 2017). *Economic Highlights, 2017*. http://www.houston.org/assets/pdf/economy/Economic-Highlights-2017-web.pdf

eligible for SBA business disaster loans. Loans can be used to repair or replace disaster-damaged property owned by the business.

The total verified loss for real estate totaled more than $1.2 billion and the total verified loss of business content was more than $146 million in Houston. The total combined business verified loss in Houston was over $1.4 billion for Hurricane Harvey. The SBA has approved over $271 million, as of January 2018. The remaining amount of loss totals over $1.1 billion. Following the methodology used by the GLO, the City uses the remaining amount of loss totals as the preliminary unmet need for businesses impacted by Hurricane Harvey.

3. Summary of Economic Unmet Need

Overall, the Houston economy is strong post-Harvey. However, the economy of certain neighborhoods, such as those with flooded homes that remain vacant, may continue to see impacts with fewer residents in the area for business or retail. Some neighborhoods have real estate values that have plummeted, while in others it has increased. Recovery in some neighborhoods will take many years. Economic recovery also differs from household to household. Individuals with lower educational attainment or employment skills may be less resilient than others to recover from a major storm event. So, although the economy is strong at the macro level, many households struggle to recapture what they had before Hurricane Harvey because of a lost job, lost pay, or lost property, and they do not have the ability to increase their income to cover the cost of their recovery.

In addition, Hurricane Harvey has affected certain sectors more than others, such as the construction industry. With damaged homes in need of repair, elevation, or reconstruction, there has been a significant increase in construction demand, beginning in the fall of 2017. This demand has led to a labor shortage and higher costs for residents in need of home repair. The community input received so far has confirmed the struggle for families in finding reasonably priced contractors to complete needed repairs on their flood-damaged properties in a timely manner.

Policy changes spurred by Hurricane Harvey's impacts on life and property may also impact the economy. In April 2018, Houston City Council approved a rule for new home and other building developments in the floodplain to be elevated above a certain level. Many argued against this change saying it may drive up prices and stifle development. The new policy comes into effect on September 1, 2018, and any impacts are yet to be determined. If other City or State rules are passed in response to Harvey impacts, these may also have effects on Houston's economy.

4.1. General Requirements

A. Rehabilitation/Reconstruction of Public Housing, Affordable Housing and other forms of Assisted Housing

The GLO will identify and address the rehabilitation, reconstruction, and replacement of the following types of housing affected by Hurricane Harvey: public housing (including administrative offices); HUD-assisted housing; affordable housing; McKinney-Vento Homeless Assistance Act-funded shelters and housing for the homeless including emergency shelters and transitional and permanent housing for the homeless; private market units receiving project-based Section 8 assistance and tenants participating in the Section 8 Housing Choice Voucher Program.

All proposed projects will undergo Affirmatively Furthering Fair Housing (AFFH) review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination. Applications will 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.

The GLO will retain the full 5 percent allocated for administrative costs associated with the CDBG-DR allocation for purposes of oversight, management, and reporting. The only exception is an allowance for up to 2.4 percent of program amounts for administration costs in the Harris County and City of Houston programs. Subrecipients for the local buyout and acquisition program may spend up to 12 percent of program amounts for costs directly related to implementation. Harris County and the City of Houston are allowed to spend up to 10 percent of program amounts for costs directly related to implementation of housing activities. Subrecipients, including Harris County and the City of Houston are allowed to spend up to 6 percent for non-housing and infrastructure type activities for CDBG-DR grant awards $1 million or greater. For non-housing and infrastructure grant awards less than $1 million refer to GLO guidance found on the website, http://recovery.texas.gov/. Once program level allocations are identified by Harris County and the City of Houston, administrative costs will be outlined in subsequent Action Plan Amendment budgets. Engineering and design activities will be capped at 15 percent of the total project award unless special services are necessary; subject to GLO approval. The GLO, Harris County and the City of Houston will limit planning costs to 5 percent of each respective allocation to complete projects as defined in 24 Code of Federal Regulations (CFR) 570.205.

The GLO will create policies and procedures to assess the cost-effectiveness of each proposed project whose goal is to assist a household under any residential rehabilitation or reconstruction program. These policies and procedures will include criteria that determine whether the rehabilitation or reconstruction of the unit will be cost-effective relative to other means of assisting the property owner such as buyout or acquisition of the property or construction of area-wide protective infrastructure. Additionally, the GLO will offer, as appropriate, other housing alternatives that are more-cost effective, such as manufactured housing options.

On a case-by-case basis, the GLO will consider exceptions to these comparison criteria and will describe:

- The process used to analyze the circumstances under which an exception is necessary;
- How reasonable accommodations were made to provide accessibility for an occupant with a disability;
- How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles.

B. Housing for Vulnerable Populations

The GLO will promote housing for vulnerable populations, including a description of activities that will address the following: the transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness; the prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; the special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents, as identified in 24 CFR 91.315(e)).

The GLO and subrecipients administering programs related to direct housing assistance, in consultation with affected citizens, stakeholders, local governments, and public housing authorities, will conduct needs assessments. The local needs assessment and analysis of HUD/FEMA demographic IA data will recommend the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The needs assessment will determine the activities to be offered, the demographics to receive concentrated attention, and target areas to be served. The needs assessment will set goals within the income brackets similar to the damage units within the impacted areas. Deviations from goals must be approved by the GLO before the subrecipient may move forward.

The GLO and subrecipients administering programs related to direct housing assistance are committed to AFFH through established affirmative marketing policies. The GLO and subrecipient will coordinate with HUD-certified housing counseling organizations. Affirmative marketing efforts will include an affirmative marketing plan, based on the HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners from all groups including, but not limited to, racial, ethnic, national origin, religious, familial status, the disabled, "special needs", and gender groups.

C. Displacement of Persons and/or Entities

To minimize the displacement of persons and/or entities that may be affected by the activities outlined in this Action Plan, the GLO will coordinate with other state agencies, local governments, and local non-profit organizations to ensure minimal displacement. However, should any proposed projects cause the displacement of people, the GLO will ensure the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act, as amended, are met.

The relocation assistance requirements at section 104(d)(2)(A) of the Housing and Community Development Act (HCDA) and 24 CFR 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified by the notice for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation). Both FEMA and CDBG funds are subject to the requirements of the URA; however, CDBG funds are subject to Section 104(d), while FEMA funds are not. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. By contrast, Section 104(d) allows a lower-income displaced person to choose between the URA rental assistance payment and a rental assistance payment calculated over a period of 60 months. This waiver of the Section 104(d) requirements ensures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under the federal register notice.

The GLO will follow its Residential Anti-displacement and Relocation Assistance Plan (RARAP). The GLO will take the following steps and require subrecipients and developers to minimize the direct and indirect displacement of persons from their homes: Plan construction activities to allow tenants to remain in their units as long as possible, by rehabilitating empty units or buildings first; where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement; adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods; adopt tax assessment policies, such as deferred tax payment plans, to reduce impact of increasing property tax assessments on lower income owner-occupants or tenants in revitalizing areas; or target only those properties deemed essential to the need or success of the project.

D. Maximum Assistance

The maximum amount of assistance available to subrecipients under the GLO's disaster recovery program will be the maximum allocated to the HUD most impacted and distressed areas. For all housing and buyout programs, the GLO's housing guidelines establish housing assistance maximums. Each subrecipient will set the maximum amount of assistance available to a beneficiary under its program to be equal to or less than the GLO's housing assistance maximums. A waiver request must be submitted to the GLO if a subrecipient's housing assistance maximums exceed the GLO amounts. The GLO will evaluate each housing assistance waiver request for cost effectiveness.

E. Elevation Standards

The GLO will apply the following elevation standards to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA's data source identified in 24 CFR 55.2(b)(1). All structures, as defined under 44 CFR 59.1, designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined under 24 CFR 55.2(b) (10), must be elevated with the lowest floor, including the basement, at least 2 feet above the annual floodplain elevation. Mixed-use structures with no dwelling units and no residents below the annual

floodplain must be elevated or floodproofed in accordance with FEMA floodproofing standards under 44 CFR 60.3(c)(3)(ii) or successor standard, at least 2 feet above the annual floodplain. Applicable state, local, and tribal codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, will be followed.

The GLO has established elevation costs caps at $60,000 for elevation of single-family homes in coastal counties, and $35,000 for non-coastal counties. These elevation costs caps were established considering elevation costs associated with past GLO CDBG-DR housing rehabilitation/reconstruction programs. Elevation costs higher than these established caps will require a waiver request to the GLO. Elevation requirements are taken into consideration when determining whether to rehabilitate or reconstruct a home. Generally, a home will be reconstructed when home repair costs are greater than $65,000, an exception to this may include a home that has been determined eligible on the National Register of Historic Places. The GLO may re-evaluate its elevation costs caps during the implementation of the HAP based on average costs associated with elevating single-family homes and on a case by case basis as needed.

Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100- year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an ‘‘activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.’’ For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

The GLO has not established elevation cost caps for multifamily rental developments and infrastructure (public facilities, public improvements, and/or nonresidential structures). To evaluate reasonable elevation costs, the GLO will rely on licensed engineers responsible for project budget justification, construction code requirements, and CDBG-DR project funding maximums. The GLO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects.

F. Planning and Coordination

The GLO’s recovery projects will be developed in a manner that considers an integrated approach to address long-term recovery and restoration of infrastructure, housing, and economic revitalization in the most impacted and distressed areas.

The GLO will continue to work with state and local jurisdictions to provide guidance on promoting sound short- and long-term recovery plans in the affected areas by coordinating available resources to help in the restoration and recovery of damaged communities. Disaster recovery presents

affected communities with unique opportunities to examine a wide range of issues such as drainage and flood control, housing quality and availability, road and rail networks, environmental issues, and the adequacy of existing infrastructure. The GLO will support long-term plans put in place by local and regional communities that promote sound, sustainable, long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible floodplain management and take into account future possible extreme weather events and other natural hazards and long-term risks.

The GLO will coordinate as much as possible with local and regional planning efforts to ensure consistency, to promote community-level and/or regional (e.g., multiple local jurisdictions) post-disaster recovery and mitigation, and to leverage those efforts. As detailed later in this Action Plan, the GLO will utilize partnerships with the Texas universities and/or vendors (term which shall include, but not limited to, governmental entities, non-profit and for profit firms, entities, and organizations) in order to further coordinate planning, studies and data analysis.

The GLO will obtain formal agreements with State Historic Preservation Officer, Fish and Wildlife Service, and National Marine Fisheries Service, for compliance with section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1536) when designing a reimbursement program. The GLO will notify HUD when these agreements have been executed.

G. Infrastructure Activities

The GLO will encourage subrecipients to integrate mitigation measures into rebuilding activities and the extent to which infrastructure activities funded through this grant will achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction. By being informed by future, ongoing, and previously conducted regional studies, the GLO will ensure better coordination of projects between localities to address recovery and mitigation in a more holistic manner.

The GLO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects. Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

The GLO will seek to ensure that infrastructure activities will avoid disproportionate impact on vulnerable populations (as referenced in paragraph A.2.a(4) of section VI in the Federal Register Notice, Vol. 83, No. 28, Tuesday, February 9, 2018) and will ensure, to the extent practicable, that activities create opportunities to address economic inequities facing local communities. All project applications will undergo an AFFH review by the GLO before approval. AFFH application reviews will include assessments of a proposed project's (1) area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination.

The GLO will coordinate with federal, state, local, private, and nonprofit sources to assist subrecipients to align investments with other planned state or local capital improvements and

infrastructure development efforts. The GLO will also work with subrecipients to identify additional infrastructure funding from multiple sources, including both existing state and local capital improvement projects as well as the potential for private investment.

The GLO will rely on professional engineers procured by subrecipients to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

H. Leveraging Funds

The GLO will encourage subrecipients to leverage CDBG-DR funds with funding provided by other federal, state, local, private, and nonprofit sources to utilize the limited CDBG-DR funds to the fullest possible extent. The GLO will report on leverage funds in the Disaster Recovery Grant Reporting System (DRGR) system.

The GLO anticipates leveraging CDBG-DR funds with the work by GLO and FEMA for the short-term housing recovery through the Direct Assistance for Limited Home Repair program and PREPS program. The GLO and subrecipients also anticipate collaborating with local governments, local long-term recovery groups, local non-profit organizations, and vulnerable populations advocacy groups.

Funds may be used for matching requirements, share, or contribution for any other Federal program when used to carry out an eligible CDBG–DR activity. This includes programs or activities administered by the FEMA or USACE. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is $250,000 or less.

I. Protection of People and Property

1. Quality Construction Standards

The GLO will require both quality inspections and code compliance inspections on all projects. Site inspections will be required on all projects to ensure quality and compliance with building codes. The GLO will encourage and support subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable. In the project application, subrecipients will submit an explanation of both current and future planned codes to mitigate hazard risks. The GLO will provide technical guidance on hazard mitigation code examples.

All rehabilitation (meets the definition of substantial improvement), reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs: (1) ENERGY STAR (Certified Homes or Multifamily High-Rise), (2) Enterprise Green Communities, (3) LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), or (4) ICC– 700 National Green Building Standard. For rehabilitation of non-substantially damaged residential buildings, the GLO will follow the guidelines to the extent applicable as

specified in the HUD CPD Green Building Retrofit Checklist. For infrastructure projects, the GLO will encourage, to the extent practicable, implementation of green building practices.

2. Housing Contractors Standards

The GLO will establish standards in the request for qualifications for housing contractors and will encourage subrecipients to do the same. The standards will include, but are not limited to, information on the company's (1) organizational structure and capabilities, (2) ability to perform, (3) recent construction projects completed or underway over the past 5 years, (4) performance and payment bond capacity, (5) financial statements for the past two years, (6) evidence of insurance coverage, and (7) business registrations, certifications, and licenses.

To ensure full and open competition, subrecipients are required to follow federal procurement and contract requirements outlined in 2 CFR 200.318 – 200.326. The GLO will monitor subrecipient procurement. The GLO will require a warranty period post-construction for housing; all work performed by the contractor will be guaranteed for a period of 1 year.

J. Appeals Processes

The GLO responds to complaints and appeals in a timely and professional manner to maintain a quality level of operations. The GLO's appeals processes apply to appeals received from homeowners, contractors, cities, counties, housing authorities, and other entities. The GLO will respond to homeowners by coordinating with the applicable subrecipient and/or housing contractor to resolve issues.

A record of each complaint or appeal that the GLO receives is kept in an information file. When a complaint or appeal is received, the GLO will respond to the complainant or appellant within 15 business days where practicable. For expediency, the GLO will utilize telephone communication as the primary method of contact; email and postmarked letters will be used as necessary to document conversations and transmit documentation.

Information about the complainant's rights and how to file a complaint shall be printed on all program applications, guidelines, the GLO public website, and subrecipients' websites in all local languages, as appropriate and reasonable. Procedures for appealing a GLO decision on a complaint shall be provided to complainants in writing as part of the complaint response.

K. Dam and Levee Requirements

As stated in the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, CDBG-DR funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. The GLO will ensure that if subrecipients use CDBG-DR funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers (USACE)National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the USACE PL 84–99 Program (Levee Rehabilitation and Improvement Program), and (3) ensure the structure is accredited under the FEMA NFIP. The GLO will upload into the DRGR system the exact location of the structure

and the area served and protected by the structure and maintain file documentation demonstrating that the grantee has conducted a risk assessment prior to funding the flood control structure and that the investment includes risk reduction measures.

L. Program Income

Any program income earned as a result of activities funded under this grant will be subject to alternate requirements of 24 CFR 570.489(e), which defines program income. Program income generated under individual contracts with the subrecipients will be returned to the GLO. At the GLO's discretion, program income could be allowed to remain with a community to continue recovery efforts.

M. Monitoring Standards

The GLO provides program-wide oversight and monitoring activities for all applicable CDBG and related federal requirements in its administration of the CDBG-DR Program. The GLO will provide technical assistance to recipients from the application stage through the completion of the projects to ensure that funds are appropriately used for the CDBG-DR activities, as well as meeting one of the national objectives.

The GLO will monitor all contract expenditures for quality assurance and to prevent, detect, and eliminate fraud, waste, and abuse as mandated by Executive Order (EO) RP 36, signed July 12, 2004, by the Governor of Texas. The GLO will particularly emphasize mitigation of fraud, abuse, and mismanagement related to accounting, procurement, and accountability which may also be investigated by the State Auditor's Office (SAO). In addition, the GLO and the grantees are subject to Uniform Guidance Standards of 2 CFR 200, which encompasses the review of compliance with program requirements and the proper expenditure of funds by an independent Certified Public Accountant (CPA) or by the SAO. Reports from the SAO's office will be sent to the Office of the Governor, the Legislative Committee, and the GLO.

The GLO has an internal audit staff that performs independent internal audits of programs and can perform such audits on these programs and grantees. The GLO also has an independent auditing staff that reports directly to the Commissioner of the GLO and the Chief Clerk. The GLO will utilize a monitoring plan to specifically ensure that the recovery allocation is carried out in accordance with state and federal laws, rules, and regulations, as well as the requirements set forth in the Federal Register Notices. The monitoring plan will also include duplication of benefits review to ensure compliance with the Stafford Act.

N. Broadband Infrastructure

As required by the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, any new construction or substantial rehabilitation, as defined by 24 CFR 5.100, of a building with more than four rental units will include installation of broadband infrastructure, as defined in 24 CFR 5.100, except where the grantee documents that: (1) the location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible; (2) the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its

program or activity or in an undue financial burden; or (3) the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

O. Disaster Recovery and Response Plan

In addition to working with universities and and/or vendors on the development of local, regional, and state planning activities, the GLO will develop a comprehensive disaster recovery and response plan that addresses long-term recovery and pre-and post-disaster hazard mitigation through the consolidation and enhancement of current plans.

P. Section 3 Compliance

For applicable funded programs, the GLO and its subrecipients will ensure compliance with all pertinent Section 3 regulations to the greatest extent possible, including providing training, employment, contracting, and other economic opportunities to low-income and very low-income persons, especially recipients of government assistance for housing and to businesses that provide economic opportunities to low- and very low-income persons. Additional details can be found in Section 3 policy and procedures.

5.1. State Administered Disaster Recovery Program

A. Action Plan

As required by the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, and Vol. 83, No. 157, Tuesday, August 14, 2018, this Action Plan must describe the MOD of funds and the descriptions of specific programs or activities the GLO will carry out directly. The needs assessment, Section 3.1, of this plan was conducted for the development and prioritization of recovery activities. In addition, the GLO consulted with affected citizens, stakeholders, local governments, and public housing authorities to assess needs.

This Action Plan will outline the following: the eligible affected areas and subrecipients; criteria for eligibility; the methodology used to distribute funds to those subrecipients; activities for which funding may be used; and program requirements, including non-duplication of benefits. The Action Plan will also define how the uses of this allocation address necessary expenses related to disaster relief, long-term recovery and restoration of infrastructure, and housing and economic revitalization.

B. Direct Allocation

In the Initial Action Plan the areas of the city of Houston and Harris County each received a direct allocation from the State's allocation at the direction of HUD. The amounts allocated to the areas of the city of Houston and Harris County for the initial $5.024 billion were based on the amounts of unmet need calculated by HUD. The same methodology was used by HUD to determine the amount of the $5.024 billion allocated to the rest of the State of Texas. The amounts were then adjusted to account for the prior allocation to Harris County, the economic revitalization program, and state administration costs. Located in Appendix G (Section 13.1) is a table that identifies these initial adjustments made in the Initial Action Plan.

In APA 1 the City of Houston and Harris County developed their own local recovery programs each were required to develop a local action plan. The local action plans have been developed in accordance with the requirements HUD has outlined in the Federal Register Notice. At a minimum the action plans submitted by the city of Houston and Harris County had to include the following: needs assessment; connection to unmet needs, local programs and requirements, local consultation, and expenditure timelines. At least 70 percent of the CDBG-DR program funds must be used to support activities that benefit LMI persons. These local action plans were included in APA 1.

The GLO was required under the Federal Register Notice to certify that its subrecipients currently have or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner. The city of Houston and Harris County were required to provide Financial Management and Grant Compliance certification, Implementation Plan, and Capacity Assessment with supporting documents. The GLO, through an independent third party, reviewed the capacity certifications.

APA 2 allocated an additional $652,175,000 in program funds provided by Public Law 115-123. The GLO allocated the funds to Harris County, the city of Houston, and the State of Texas by

applying the same methodology used to allocate funds for the State HAP, as described in Section 12.1 Appendix F: Regional Methods of Distribution, but with Harris County and the city of Houston included

APA 7 made adjustments to the amounts allocated directly to Harris County and the City of Houston reflecting the creation of state-run programs for homeowner assistance for residents located in the City of Houston and Harris County, as well as the creation of a rental housing program and economic revitalization program in the City of Houston, and the removal of some funds from the direct allocation received by Harris County, and the total removal of funds from the City of Houston administered programs.

APA 8 increased the amount allocated Harris County administered program, and the programs administered by the city of Houston prior to APA7 have been reimplemented and have had funds reallocated. The state-run Harris County Homeowner Assistance Program, City of Houston Homeowner Assistance Program, Housing Project Delivery and Administration budgets have been reduced, and the state-run City of Houston Rental Program and Economic Revitalization program have been removed.

Amendment 11 will reallocate $140,930,253 from the City of Houston administered disaster recovery programs to the State administered City of Houston Homeowner Assistance Program. The funds are being reallocated from the City of Houston administered disaster recovery programs that failed to meet program contract benchmarks. The reallocated funds will be used in the oversubscribed State administered City of Houston Homeowner Assistance Program to rehabilitate and reconstruct homes damaged by Hurricane Harvey within the City of Houston. Amendment 11 maintains the $1.2 billion in CDBG-DR funds to address unmet recovery needs within the City of Houston.

Amendment 12 reallocates $30 million from the City of Houston administered disaster recovery program, $30 million from Harris County administered disaster recovery program, $83.9 million from State administered City of Houston Homeowner Assistance Program (HAP), and $178.13 million from the State administered Harris County HAP to the Harris County Flood Control District (HCFCD). The funds are being reallocated from the City of Houston and Harris County administered disaster recovery programs that failed to meet program contract benchmarks. The GLO has and will serve all eligible applicants within the State-Administered Harris County HAP and the State-Administered City of Houston HAP.

The HCFCD program will provide disaster relief, long-term recovery, and flood and drainage improvement for local communities within Harris County impacted by Hurricane Harvey as well as protecting assets that have since been repaired from Hurricane Harvey. Each project must demonstrate how it will contribute to the long-term recovery and restoration of housing. Amendment 12 maintains the $2.46 billion in CDBG-DR funds to address unmet recovery needs within Harris County and the City of Houston.

As part of its grant oversight responsibilities, the GLO will ensure that funds are used in a timely manner. For the City of Houston and Harris County, contracts were amended to include updated benchmarks based on past performance and future goals of the program. GLO also diligently tracks

the use of funds in State-run programs. As programs close out, GLO strives to reallocate those funds as soon as possible to eligible projects that can use the funds during the remainder of the grant term.

C. Connection to Unmet Needs

As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, and Vol. 83, No. 157, Tuesday, August 14, 2018, the GLO will allocate at least 80 percent of the funds to address unmet needs within HUD-identified "most impacted and distressed" (HUD MID) areas:

> Aransas, Brazoria, Chambers, Fayette, Fort Bend, Galveston, Hardin, Harris, Jasper, Jefferson, Liberty, Montgomery, Newton, Nueces, Orange, Refugio, San Jacinto, San Patricio, Victoria, and Wharton Counties; 75979, 77320, 77335, 77351, 77414, 77423, 77482, 77493, 77979, and 78934 ZIP Codes.

Up to 20 percent of the allocation may only be used to address unmet disaster needs in those counties that received a Hurricane Harvey presidential major disaster declaration (DR-4332), State "most impacted and distressed" (State MID) areas.

This Action Plan primarily considers and addresses unmet housing needs with 80 percent of the state program funds addressing unmet needs directly related to housing. Through the assessment of needs, the GLO developed the following housing programs: Homeowner Assistance Program (HAP); local buyout/acquisition program; a homeowner reimbursement program; and affordable rental housing program. In addition, the GLO has allocated funds for the state cost share for the PREPS program. The programs were developed to meet CDBG-DR, federal and state requirements and regulations, and to implement the long-term recovery of housing as efficiently and expeditiously as possible. It is anticipated that public service type activities may need to be utilized to complement these housing programs. Public service activities may include, but are not limited to, housing counseling, legal counseling, job training, mental health, and general health services.

The majority of the funds have been allocated to assist homeowners through the reimbursement of repairs, and rehabilitation and reconstruction of their homes. Funds have been allocated for residential buyouts and acquisition to remove homes from harm's way.

The Affordable Rental program will address the need for affordable rental units as a result of the impact of Hurricane Harvey. The program will allow for rehabilitation, reconstruction, and the new construction of multi-family developments. The purpose of the rental program is to repair restore and increase the affordable rental stock for LMI households.

The GLO anticipates leveraging CDBG-DR funds with the work underway by GLO and FEMA for the short-term housing recovery through the Direct Assistance for Limited Home Repair program and PREPS program. The GLO and subrecipients also anticipate collaborating with local governments, local long-term recovery groups, local non-profit organizations, and vulnerable populations advocacy groups.

Although there are remaining unmet housing needs due to the limitation of funds available, the GLO recognizes that as part of a comprehensive long-term recovery program infrastructure activities are vital not only for the long-term recovery and restoration of housing but for the long-term recovery, protection, and viability of communities. Nineteen (19) percent of the funds will address unmet needs related to infrastructure and economic development.

The GLO has allocated five (5) percent for planning activities. Because of the vast nature of Hurricane Harvey disaster and the recurring nature of disasters in the region, the GLO will concentrate on regional approaches in addition to specific local solutions to promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks.

The GLO has allocated five (5) percent for administrative costs, including contract administration, compliance monitoring, and the provision of technical assistance to applicants and sub-recipients. Based on experience, it is expected that some subrecipients will need direct support implementing their programs; therefore, the GLO is allocating two percent for project delivery. The GLO providing direct support to subrecipients will help ensure that the program is implemented as the efficiently and expeditiously as possible.

At least 70 percent of all program funds will benefit LMI persons.

A summary of the State of Texas unmet need is identified in the table below. As required, a needs assessment was completed to identify long-term needs and priorities for CDBG-DR funding allocated as a result of Hurricane Harvey. The assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors. The needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed communities and includes details for housing, infrastructure, and economic revitalization. The needs assessment is expected to be amended as additional information is available or updated. The summary of unmet needs has been updated to include Harris County and City of Houston based on their needs assessments provided in sections 3.2. and 3.3.

Table 53: Summary of Total Unmet Need (Updated APA 20)

Category	Losses/Gap	CDBG-DR Investments*	Other Known Investments	Remaining Unmet Need
Housing	**$29,379,225,450.00**	**($4,032,728,505.69)**	**($13,323,038,264.00)**	**$12,023,458,680.31**
Owner-Occupied Housing**	$6,958,668,050			$6,958,668,050
Residential Property Insurance	$2,454,674,305		($1,386,924,741)	$1,067,749,564
Private Flood and Federal Flood - Write Your Own	$8,355,507,533		($3,058,562,923)	$5,296,944,610
National Flood Insurance Program	$8,820,724,462		($8,820,724,462)	$0
State Housing Programs		$ (2,786,690,441.74)		($2,786,690,442)
Rental-occupied Housing**	$2,713,882,916			$2,713,882,916
Public Housing Authority Housing	$75,768,184		($56,826,138)	$18,942,046
Harris County Buyout Program (Pub L. 115-31)		($43,465,600)		($43,465,600)
Other MI Counties (Pub L. 115-31)		($10,866,400)		($10,866,400)
Harris County Housing Programs		($614,537,359)		($614,537,359)
City of Houston Housing Programs		($577,168,704.95)		($577,168,705)
Infrastructure	**$68,958,741,056**	**($1,036,300,608)**	**($7,162,866,950)**	**$60,759,573,498**
FEMA Public Assistance	$7,958,741,056		($7,162,866,950)	$795,874,106
Infrastructure Resilience/Mitigation				$0
Rebuild Texas Commission	$61,000,000,000			$61,000,000,000
State Local Infrastructure Program		($406,304,099)		($406,304,099)
Harris County Flood Control District Program		($322,033,863)		($322,033,863)
Harris County Infrastructure Programs		($216,462,646)		($216,462,646)
City of Houston Infrastructure Programs		$0		$0
Disaster Recovery Reallocation Program		($91,500,000)		($91,500,000)
Economic	**$14,848,838,581**	**($130,509,343)**	**($2,201,771,329)**	**$12,516,557,909**
SBA Business/EIDL Loans	$5,910,381,954		($1,384,938,700)	$4,525,443,254
Agriculture Losses	$200,000,000			$200,000,000
Gross State Product	$3,800,000,000			$3,800,000,000
Disaster Unemployment Assistance			($11,201,909)	($11,201,909)
Commercial Property Insurance	$4,938,456,627		($805,630,720)	$4,132,825,907
State Economic Revitalization Program		($110,000,000.00)		($110,000,000)
Harris County Economic Revitalization Programs		$0		$0
City of Houston Economic Revitalization Programs*		($20,509,342.82)		($20,509,343)
Totals	**$113,186,805,087**	**($5,199,538,457)**	**($22,687,676,543)**	**$85,299,590,087**

***CDBG-DR investments include project delivery costs. **Does not exclude or discount the estimated loss for those identified as having homeowners and/or flood insurance in FEMA's IA data.*.**

D. Regional MOD

The GLO understands that additional information and clarity will come with time and anticipates that as additional funds are allocated, there may be a different methodology for the distribution of those funds. The GLO partnered with the University of Texas at Austin to develop the regional MOD for housing (HAP and Local Buyout/Acquisition Program) and infrastructure. The MOD for these allocations used census data, FEMA IA data, FEMA PA data, SoVI, and other data sources that demonstrate the impact of Hurricane Harvey, to distribute funds. In both housing and infrastructure, the MOD establishes a balance between the total unmet need, the ability to recover, and the relative population of impacted areas. As further data becomes available, adjustments may be necessary in future allocation MODs to account for data that does not exist as of today's Action Plan. Each of these variables plays a factor in the recovery process and is reflected in the distribution models. The methodology for the distribution and calculation is located in section 12.1, Appendix F. Updates to the regional MOD used to allocate the additional funds allocated to the State HAP are described in the revised section 12.1, Appendix F. The regional MODs do not include the city of Houston and Harris County.

E. Program Budget

Table 54: Total Allocation Budget (Updated in APA 20)

Programs		HUD Most Impacted Areas	State Most Impacted Areas	LMI Amount	Total	% of Total Allocation by Program	% of Total Allocation	Total
Direct Allocation Programs								
Direct Programs - Harris County								
Harris County - Housing	Homeowner Assistance Program	$ 48,225,717.00	$ -	$ 37,000,000.00	**$ 48,225,717.00**	**0.85%**	**10.83%**	**$ 614,537,359.00**
	Residential Buyout Program	$ 218,113,514.00	$ -	$ 158,206,036.00	**$ 218,113,514.00**	**3.84%**		
	Reimbursement Program	$ 46,123,171.00	$ -	$ 23,000,000.00	**$ 46,123,171.00**	**0.81%**		
	Affordable Rental Program	$ 235,971,727.00	$ -	$ 235,971,727.00	**$ 235,971,727.00**	**4.16%**		
	SF New Construction	$ 66,103,230.00	$ -	$ 60,081,117.00	**$ 66,103,230.00**	**1.16%**		
Harris County - Infrastructure	Commercial Buyout Program	$ 17,830,933.00	$ -	$ 17,830,933.00	**$ 17,830,933.00**	**0.31%**	**3.81%**	**$ 216,462,646.00**
	Method of Distribution (Local)	$ 128,405,786.00	$ -	$ 89,884,050.00	**$ 128,405,786.00**	**2.26%**		
	Competitive Application	$ 70,225,927.00	$ -	$ 49,158,148.00	**$ 70,225,927.00**	**1.24%**		
Harris County Public Services	Public Services	$ 1,332,245.00	$ -	$ 1,290,966.00	**$ 1,332,245.00**	**0.02%**	**0.02%**	**$ 1,332,245.00**
Harris County - Planning and Administration	Harris County Planning	$ 33,017,028.00	$ -	N/A	**$ 33,017,028.00**	**0.58%**	**0.97%**	**$ 55,002,734.00**
	Harris County Administration	$ 21,985,706.00	$ -	N/A	**$ 21,985,706.00**	**0.39%**		
	Harris County Subtotal	**$ 887,334,984.00**	**$ -**	**$ 672,422,977.00**	**$ 887,334,984.00**	**15.63%**		
Direct Programs - City of Houston								
City of Houston - Housing	Homeowner Assistance Program	$ 68,060,675.08	$ -	$ 63,769,505.82	**$ 68,060,675.08**	**1.20%**	**10.17%**	**$ 577,168,704.95**
	Single Family Development Program	$ 3,589,439.37	$ -	$ 3,589,439.37	**$ 3,589,439.37**	**0.06%**		
	Multifamily Rental Program	$ 370,855,752.00	$ -	$ 370,855,752.00	**$ 370,855,752.00**	**6.53%**		
	Small Rental Program	$ 11,355,268.88	$ -	$ 11,355,268.88	**$ 11,355,268.88**	**0.20%**		
	Homebuyer Assistance Program	$ 36,046,498.95	$ -	$ 23,452,314.16	**$ 36,046,498.95**	**0.64%**		
	Buyout Program	$ 87,261,070.67	$ -	$ 87,261,070.67	**$ 87,261,070.67**	**1.54%**		
City of Houston -Public Services and Economic Revitalization	Public Services	$ 17,175,483.19	$ -	$ 17,175,483.19	**$ 17,175,483.19**	**0.30%**	**0.66%**	**$ 37,684,826.01**
	Economic Revitalization Program	$ 20,509,342.82	$ -	$ 20,509,342.82	**$ 20,509,342.82**	**0.36%**		
City of Houston - Planning and Administration	City of Houston Planning	$ 21,780,921.41	$ -	N/A	**$ 21,780,921.41**	**0.38%**	**0.65%**	**$ 36,780,921.41**
	City of Houston Administration	$ 15,000,000.00	$ -	N/A	**$ 15,000,000.00**	**0.26%**		
	City of Houston Subtotal	$ 651,634,452.37		$ 597,968,176.91	**$ 651,634,452.37**	**11.48%**		
	Direct Allocation Subtotal	**$ 1,538,969,436.37**	**$ -**	**$ 1,270,391,153.91**	**$ 1,538,969,436.37**			
GLO State Programs								
State Housing	**Homeowner Assistance Program**	**$ 1,237,671,730.00**	**$ 96,550,495**	**$ 933,955,558**	**$ 1,334,222,225.00**	**23.50%**	**49.09%**	**$ 2,786,690,441.74**
	AACOG	$ -	$ 2,994,343.00	$ 2,096,040.00	$ 2,994,343.00	*0.22%*		
	BVCOG	$ -	$ 2,058,611.00	$ 1,441,028.00	$ 2,058,611.00	*0.15%*		
	CAPCOG	$ 4,835,864.00	$ 2,275,701.00	$ 4,978,096.00	$ 7,111,565.00	*0.53%*		
	CBCOG	$ 246,868,431.00	$ 15,757,560.00	$ 183,838,194.00	$ 262,625,991.00	*19.68%*		
	CTCOG	$ -	$ -	$ -	$ -	*0.00%*		
	DETCOG	$ 147,589,819.00	$ 12,607,531.00	$ 112,138,145.00	$ 160,197,350.00	*12.01%*		
	GCRPC	$ 54,895,151.00	$ 13,723,788.00	$ 48,033,257.00	$ 68,618,939.00	*5.14%*		
	H-GAC	$ 557,911,468.00	$ 47,132,961.00	$ 423,531,100.00	$ 605,044,429.00	*45.35%*		
	SETRPC	$ 225,570,997.00	$ -	$ 157,899,698.00	$ 225,570,997.00	*16.91%*		
	Harris County Homeowner Assistance Program	**$ 108,214,125.00**	**$ -**	**$ 75,749,887.50**	**$ 108,214,125.00**	**1.91%**		
	City of Houston Homeowner Assistance Program	**$ 494,221,438.63**	**$ -**	**$ 345,955,007.04**	**$ 494,221,438.63**	**8.71%**		
	Local Buyout/Acquisition Program	**$ 91,328,510.74**	**$ 8,422,240.25**	**$ 69,825,525.69**	**$ 99,750,750.99**	**1.76%**		
	AACOG	$ -	$ 31,060.91	$ 21,742.64	$ 31,060.91	*0.03%*		
	BVCOG	$ -	$ 1,512,129.00	$ 1,058,490.30	$ 1,512,129.00	*1.52%*		
	CAPCOG	$ 3,385,827.20	$ 917,616.65	$ 3,012,410.70	$ 4,303,443.85	*4.31%*		
	CBCOG	$ 706,501.75	$ -	$ 494,551.23	$ 706,501.75	*0.71%*		
	CTCOG	$ -	$ 31,390.56	$ 21,973.39	$ 31,390.56	*0.03%*		
	DETCOG	$ 19,162,848.36	$ 3,254,533.19	$ 15,692,167.09	$ 22,417,381.55	*22.47%*		
	GCRPC	$ 1,317,508.44	$ 58,518.85	$ 963,219.10	$ 1,376,027.29	*1.38%*		
	H-GAC	$ 47,583,204.84	$ 2,616,991.09	$ 35,140,137.15	$ 50,200,195.93	*50.33%*		
	SETRPC	$ 19,172,620.15	$ -	$ 13,420,834.11	$ 19,172,620.15	*19.22%*		
	Homeowner Reimbursement Program	**$ 102,125,895.68**	**$ 825,826.44**	**$ 35,911,195.88**	**$ 102,951,722.12**	**1.81%**		
	Affordable Rental Program	**$ 565,654,176.95**	**$ 20,975,320.45**	**$ 586,629,497.40**	**$ 586,629,497.40**	**10.33%**		
	PREPS Program	**$ 22,443,328.20**	**$ 144,562.50**	**$ -**	**$ 22,587,890.70**	**0.40%**		
	State Project Delivery	**$ 30,490,233.52**	**$ 7,622,558.38**	**$ 34,961,747.80**	**$ 38,112,791.90**	**0.67%**		
State Infrastructure and Economic Revitalization	**Local Infrastructure Program**	**$ 362,721,839.80**	**$ 43,582,259.41**	**$ 284,412,869.45**	**$ 406,304,099.21**	**7.16%**	**15.41%**	**$ 874,710,882.89**
	AACOG	$ -	$ 158,775.00	$ 111,142.50	$ 158,775.00	*0.04%*		
	BVCOG	$ -	$ 3,007,821.44	$ 2,105,475.01	$ 3,007,821.44	*0.74%*		
	CAPCOG	$ 929,021.13	$ 3,376,452.87	$ 3,013,831.80	$ 4,305,474.00	*1.06%*		
	CBCOG	$ 125,703,580.06	$ 100,645.00	$ 88,062,957.54	$ 125,804,225.06	*30.96%*		
	CTCOG	$ -	$ 510,000.00	$ 357,000.00	$ 510,000.00	*0.13%*		
	DETCOG	$ 7,303,038.25	$ 160,124.00	$ 5,224,213.58	$ 7,463,162.25	*1.84%*		
	GCRPC	$ 20,033,417.86	$ 15,945,513.35	$ 25,185,251.85	$ 35,978,931.21	*8.86%*		
	H-GAC	$ 103,739,561.87	$ 20,322,927.75	$ 86,843,742.73	$ 124,062,489.62	*30.53%*		
	SETRPC	$ 105,013,220.63	$ -	$ 73,509,254.44	$ 105,013,220.63	*25.85%*		
	Harris County Flood Control District Program	**$ 322,033,863.00**	**$ -**	**$ 161,016,931.50**	**$ 322,033,863.00**	**5.67%**		
	Economic Revitalization Program	**$ 106,643,500.00**	**$ 3,356,500.00**	**$ 110,000,000.00**	**$ 110,000,000.00**	**1.94%**		
	State Project Delivery	**$ 29,098,336.55**	**$ 7,274,584.13**	**$ 25,461,044.48**	**$ 36,372,920.68**	**0.64%**		
Disaster Recovery Reallocation Program (DRRP)		**$ 73,200,000.00**	**$ 18,300,000.00**	**$ 64,050,000.00**	**$ 91,500,000.00**	**1.61%**	**1.61%**	**$ 91,500,000.00**
State Planning and Administration	**State Planning**	**$ 110,148,357.00**	**$ 27,537,089.00**	**N/A**	**$ 137,685,446.00**	**2.43%**	**6.77%**	**$ 384,519,239.00**
	State Administration	**$ 197,467,034.40**	**$ 49,366,758.60**	**N/A**	**$ 246,833,793.00**	**4.35%**		
	State Allocation Subtotal	$ 3,853,462,369.47	$ 283,958,194.16	$ 2,727,929,264.74	$ 4,137,420,563.63			
	Grand Total Allocation	**$ 5,392,431,805.84**	**$ 283,958,194.16**	**$ 3,998,320,418.65**	**$ 5,676,390,000.00**	**100%**	**100%**	**$ 5,676,390,000.00**

Table 55: Total LMI Budget (Updated in APA 20)

Programs		LMI Amount	Total
Direct Programs	Harris County	$ 672,422,977.00	$ 887,334,984.00
	City of Houston	$ 597,968,176.91	$ 651,634,452.37
State Infrastructure and Economic Revitalization	Local Infrastructure Program	$ 284,412,869.45	$ 406,304,099.21
	Harris County Flood Control District Program	$ 161,016,931.50	$ 322,033,863.00
	Economic Revitalization Program	$ 110,000,000.00	$ 110,000,000.00
	State Project Delivery	$ 25,461,044.48	$ 36,372,920.68
State Housing Programs	Homeowner Assistance Program	$ 933,955,558.00	$ 1,334,222,225.00
	Harris County Homeowner Assistance Program	$ 75,749,887.50	$ 108,214,125.00
	City of Houston Homeowner Assistance Program	$ 345,955,007.04	$ 494,221,438.63
	Local Buyout/Acquisition Program	$ 69,825,525.69	$ 99,750,750.99
	Homeowner Reimbursement Program	$ 35,911,195.88	$ 102,951,722.12
	Affordable Rental Program	$ 586,629,497.40	$ 586,629,497.40
	PREPS Program	$ -	$ 22,587,890.70
	State Project Delivery	$ 34,961,747.80	$ 38,112,791.90
Disaster Recovery Reallocation Program (DRRP)		$ 64,050,000.00	$ 91,500,000.00
Program Subtotal		$ 3,998,320,418.65	$ 5,291,870,761.00
Planning and Administration	State Planning	N/A	$ 137,685,446.00
	State Administration	N/A	$ 246,833,793.00
	Harris County Planning	N/A	$ 33,017,028.00
	Harris County Administration	N/A	$ 21,985,706.00
	City of Houston Planning	N/A	$ 21,780,921.41
	City of Houston Administration	N/A	$ 15,000,000.00
		Grand Total:	**$ 5,676,390,000.00**

***70% LMI Requirement = $3,704,309,532.70**

F. GLO Use of Funds

The GLO will implement several state-run programs. These programs include the homeowner assistance program for rehabilitation and reconstruction of primary residences, the homeowner reimbursement program for reimbursement to homeowners for repairs on their primary residences, the affordable rental program to rehabilitate and reconstruct multifamily developments, and economic revitalization that will fund businesses directly impacted by Hurricane Harvey. This also includes the newly created Disaster Recovery Reallocation Program (DRRP) established in 2024 to support the reallocation of those deobligated and unutilized funds for much needed further recovery for previous disasters and to fully spend the amount allocated by HUD.

The GLO will allocate funds to local governments for the local residential buyout/acquisition and local infrastructure programs through MODs developed by the COGs.

The programs the GLO have selected to implement are intended to address the rehabilitation, reconstruction, replacement, and new construction of housing and shelters needs in the areas affected by Hurricane Harvey.

Harris County will develop its own local programs, and Harris County will be responsible for the implementation of its programs in its jurisdiction except where noted in this Action Plan.

1. Homeowner Assistance Program

The HAP will rehabilitate and reconstruct owner-occupied single family homes damaged by Hurricane Harvey. In addition, HAP public service is an eligible activity within HAP.

As recommended by HUD, the GLO will utilize a state-run model for the HAP. The GLO will regionalize the eligible areas for housing programs and stand up multiple programs within this activity. Regions will be established based on proximity and damage type. Considerations for construction costs and types, number of units, and total funds available may also be considered. The GLO may directly administer the programs in these areas or use the support of outside parties to serve the homeowner assistance needs. The only exception to this state-run model is related to the city of Houston and Harris County. The GLO will implement state-run HAP programs in both the city of Houston and Harris County. Homeowners located within the city of Houston and Harris County will be ineligible for participation in the state-run HAP, but will be eligible for state-run Harris County HAP and state-run city of Houston HAP.

The GLO will administer the state-run program in partnership with the impacted COG regions as they have direct knowledge of the needs in their areas. COGs will be consulted on the development of all the needs assessments and housing guidelines.

a. Allocation Amount: $1,334,222,225.00
    i. At least eighty (80) percent of funds must address unmet need in the HUDMID areas (counties and ZIP codes).
    ii. Up to twenty (20) percent of funds may address unmet need in the State MID counties minus their HUD MID ZIP codes.

b. Reallocation:
    i. As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

c. Maximum assistance:
    i. Rehabilitation: Local composite builder bid amount and not greater than $65,000.
    ii. Reconstruction: Local composite builder bid amount based on procured builders and the builder's house plans based on household size.

d. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), include but are not limited to:
    i. Single family owner-occupied rehabilitation and/or reconstruction;
    ii. Repair and replacement of manufactured housing units;
    iii. Hazard mitigation;
    iv. Elevation;
    v. Relocation Assistance;
    vi. Demolition only;
    vii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services); and
    viii. Other activities associated with the recovery of single family housing stock impacted.

e. Ineligible Activities:
    i. Forced mortgage payoff;
    ii. Incentive payments to households that move to disaster-impacted floodplains;
    iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
    iv. Rehabilitation/reconstruction of homes located in the floodway;
    v. Rehabilitation/reconstruction of a house in which:
        1. The combined household income is greater than 120 percent AMI or the national median;
        2. The property was located in a floodplain at the time of the disaster; and
        3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
    vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ''repair, replacement, or restoration'' for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster

assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

vii. Homeowners located within the city limits of Houston and/or within Harris County are ineligible to participate in the State HAP.

f. Eligibility Criteria for Assistance:
   i. Home must have been owner-occupied at the time of the storm;
   ii. Home must have served as primary residence;
   iii. Home must be located in a CDBG-DR eligible county;
   iv. Home must have sustained damage from Hurricane Harvey;
   v. Duplication of benefits review;
   vi. Costs for rehabilitation, reconstruction, and new construction are reasonable and consistent with market costs at the time and place of construction;
   vii. All applicants and co-applicants must be current on payments for child support;
   viii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;
   ix. Home must be environmentally-cleared;
   x. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
   xi. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits compliance. This is an agreement to repay any duplicative assistance if other disaster assistance for the same purpose later is received.
   xii. Unsecured Forgivable Promissory Note:
      1. Assisted homeowners are required to maintain principal residency in the assisted property for three years. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for three years. A violation of this policy will activate the repayment terms of the Note.
      2. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the subrecipient or State as applicable.
      3. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the three-year note period.

g. National Objectives: LMI and urgent need. At least 70 percent of these program funds by region and Subrecipient must be spent on LMI eligible projects.

h. Housing Guidelines: The GLO and its subrecipients will develop minimum housing guidelines that provide operational details on the eligibility requirements, housing assistance caps, construction standards, accessibility requirements, visitability standards, reporting requirements, and other program requirements. Subrecipients will produce their

own guidelines. Housing guidelines will be posted for public comment before use. The GLO must approve all guidelines.

i. Needs Assessment: The GLO and subrecipients administering the Program will conduct needs assessment. The local needs assessment and analysis of HUD/FEMA demographic IA data will recommend the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The GLO in partnership with the University of Texas at Austin will conduct a housing needs survey over the entire disaster impacted counties. The survey will assess remaining unmet housing needs resulting from Hurricane Harvey. The needs assessment will determine the activities to be offered, the demographics to receive concentrated attention, identify disabled, "special needs", and vulnerable populations, and target areas to be served. The needs assessment will also include an assessment of the types of public services activities that may be needed to complement the program, such as housing counseling, legal counseling, job training, mental health, and general health services. The needs assessment should set goals within the income brackets similar to the housing damage sustained within the impacted areas. Deviations from goals must be approved by the GLO before the Program may move forward.

j. Affirmative Marketing Outreach Plan: The GLO and subrecipients administering the Program are committed to AFFH through established affirmative marketing policies. The GLO and subrecipients will coordinate with HUD-certified housing counseling organizations in this effort. Affirmative marketing efforts will include an affirmative marketing plan, based on HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", gender groups, and vulnerable populations.

k. HAP Public Services: The GLO and other State Agencies or nonprofits having experience with homelessness prevention will administer the HAP public services activities. The public service will consist of three primary activities with the sole purpose of preventing homelessness in the region following Hurricane Harvey. This public service will be limited only to LMI households.

    i. Eligible Activities HCDA Section 105(a)(8) and 105(a)(20):
        1. Short-term Mortgage Assistance – The Short-Term Mortgage Assistance may deliver up to $10,000 to assist LMI households with mortgage payments on their primary residence. Mortgage assistance may not exceed 20 months. This program is intended to prevent foreclosure or predatory, low value buyouts of homes in the impacted areas and ensure that households can continue down the road to recovery without the imminent threat of homelessness.
        2. Utility Assistance – Utility Assistance Program will provide assistance up to $1,000 to LMI households to meet immediate utility needs. Utility assistance may include electricity, gas, wastewater, water and other utility bills and deposits.
        3. Tenant-Based Rental Assistance – Tenant-Based Rental Assistance will deliver rental assistance to LMI households in need of housing. This program may

include up to 3 months of rental assistance, including security deposit and utility deposit. This program will be administered using HUD-published Fair Market Rent (FMR), and the maximum award amount per household will be tied to FMR.

ii. Eligibility Criteria: Further guidance will be available in the guidelines.

iii. Ineligible: Activities located within the city limits of Houston and/or within Harris County are ineligible.

iv. National Objective: LMI

l. The program will undergo AFFH review. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

m. Timeline: The proposed program start date is immediately after HUD's approval of this Action Plan. The proposed end date is 7 years from the start date of the program.

2. Harris County Homeowner Assistance Program

The Harris County HAP will rehabilitate and reconstruct owner-occupied single family homes damaged by Hurricane Harvey within Harris County.

The GLO will utilize a state-run model for the Harris County HAP. The GLO may directly administer the program in this area or use the support of outside parties to serve the homeowner assistance needs. The allocation for this program was determined by the methodology outlined in the Action Plan submitted by Harris County to the GLO in response to Hurricane Harvey less any funds previously spent by Harris County on the Harris County administered Homeowner Assistance Program. Homeowners located within the city of Houston and outside of Harris County will be ineligible for participation in the state-run Harris County HAP. Homeowners located within the city of Houston will be eligible in the state-run City of Houston HAP. As Harris County completes GLO approved operations of programs detailed in previous Action Plan amendments the funding set aside by program in this Amendment may be utilized by both the County and the GLO. At no time will funds by program increase or decrease beyond total allowable amounts without benefit of another Action Plan Amendment.

a. Allocation Amount: $108,214,125.00
   i. One hundred (100) percent of funds must address unmet need in Harris County.

b. Maximum assistance:
   i. Rehabilitation: Local composite builder bid amount and not greater than $65,000.

ii. Reconstruction: Local composite builder bid amount based on procured builders and the builder's house plans based on household size.

c. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), include but are not limited to:
   i. Single family owner-occupied rehabilitation and/or reconstruction;
   ii. Repair and replacement of manufactured housing units;
   iii. Hazard mitigation;
   iv. Elevation;
   v. Relocation Assistance;
   vi. Demolition only;
   vii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services); and
   viii. Other activities associated with the recovery of single family housing stock impacted.

d. Ineligible Activities:
   i. Forced mortgage payoff;
   ii. Incentive payments to households that move to disaster-impacted floodplains;
   iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
   iv. Rehabilitation/reconstruction of homes located in the floodway;
   v. Rehabilitation/reconstruction of a house in which:
      1. The combined household income is greater than 120 percent AMI or the national median;
      2. The property was located in a floodplain at the time of the disaster; and
      3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
   vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ''repair, replacement, or restoration'' for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
   vii. Homeowners located within the city limits of Houston and/or outside of Harris County are ineligible to participate in the state-run Harris County HAP.

e. Eligibility Criteria for Assistance:
   i. Home must have been owner-occupied at the time of the storm;

ii. Home must have served as primary residence;
iii. Home must be located in Harris County but outside the City of Houston;
iv. Home must have sustained damage from Hurricane Harvey;
v. Duplication of benefits review;
vi. Costs for rehabilitation, reconstruction, and new construction are reasonable and consistent with market costs at the time and place of construction;
vii. All applicants and co-applicants must be current on payments for child support;
viii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;
ix. Home must be environmentally-cleared;
x. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
xi. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits compliance. This is an agreement to repay any duplicative assistance if other disaster assistance for the same purpose later is received.
xii. Unsecured Forgivable Promissory Note:
    1. Assisted homeowners are required to maintain principal residency in the assisted property for three years. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for three years. A violation of this policy will activate the repayment terms of the Note.
    2. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the State as applicable.
    3. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the three-year note period.

f. National Objectives: LMI and urgent need. At least 70 percent of these program must be spent on LMI eligible projects.

g. Housing Guidelines: The GLO developed minimum housing guidelines that provide operational details on the eligibility requirements, housing assistance caps, construction standards, accessibility requirements, visitability standards, reporting requirements, and other program requirements.

h. Needs Assessment: The GLO will conduct a review of the needs assessment completed by Harris County and approved by the GLO. The local needs assessment and analysis of HUD/FEMA demographic IA data recommended the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The GLO in partnership with the University of Texas at Austin conducted a housing needs survey over the entire disaster impacted counties. The survey assessed remaining unmet housing needs resulting from Hurricane Harvey. The needs assessment determined the activities to be offered, the

demographics to receive concentrated attention, identify disabled, “special needs”, and vulnerable populations, and target areas to be served. The needs assessment also includes an assessment of the types of public services activities that may be needed to complement the program, such as housing counseling, legal counseling, job training, mental health, and general health services. The needs assessment set goals within the income brackets similar to the housing damage sustained within the impacted areas. Deviations from goals must be evaluated by the GLO before the Program may move forward.

i. Affirmative Marketing Outreach Plan: The GLO is committed to AFFH through established affirmative marketing policies. The GLO coordinated with HUD-certified housing counseling organizations in this effort. Affirmative marketing efforts will include an affirmative marketing plan, based on HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", gender groups, and vulnerable populations.

j. HAP Public Services: The GLO and other State Agencies or nonprofits having experience with homelessness prevention will administer the HAP public services activities. The public service will consist of three primary activities with the sole purpose of preventing homelessness in the region following Hurricane Harvey. This public service will be limited only to LMI households.

   i. Eligible Activities HCDA Section 105(a)(8) and 105(a)(20):
      1. Short-term Mortgage Assistance – The Short-Term Mortgage Assistance may deliver up to $10,000 to assist LMI households with mortgage payments on their primary residence. Mortgage assistance may not exceed 20 months. This program is intended to prevent foreclosure or predatory, low value buyouts of homes in the impacted areas and ensure that households can continue down the road to recovery without the imminent threat of homelessness.
      2. Utility Assistance – Utility Assistance Program will provide assistance up to $1,000 to LMI households to meet immediate utility needs. Utility assistance may include electricity, gas, wastewater, water and other utility bills and deposits.
      3. Tenant-Based Rental Assistance – Tenant-Based Rental Assistance will deliver rental assistance to LMI households in need of housing. This program may include up to 3 months of rental assistance, including security deposit and utility deposit. This program will be administered using HUD-published Fair Market Rent (FMR), and the maximum award amount per household will be tied to FMR.

   ii. Eligibility Criteria: Home must be located within Harris County and outside of the city of Houston.

   iii. Ineligible: Activities located within the city limits of Houston and/or outside Harris County are ineligible.

iv. National Objective: LMI

k. The program will undergo AFFH review. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

l. Timeline: The proposed program start date is immediately after HUD's approval of Action Plan Amendment 7. The proposed end date is 5 years from the start date of the program.

3. City of Houston Homeowner Assistance Program

The City of Houston HAP will rehabilitate and reconstruct owner-occupied single family homes damaged by Hurricane Harvey.

The GLO will utilize a state-run model for the City of Houston HAP. The GLO may directly administer the program in this area or use the support of outside parties to serve the homeowner assistance needs. Homeowners located outside the city of Houston will be ineligible for participation in the state-run City of Houston HAP.

a. Allocation Amount: $494,221,438.63
   i. One hundred (100) percent of funds must address unmet need in the City of Houston.

b. Maximum assistance:
   i. Rehabilitation: Local composite builder bid amount and not greater than $65,000.
   ii. Reconstruction: Local composite builder bid amount based on procured builders and the builder's house plans based on household size.

c. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), include but are not limited to:
   i. Single family owner-occupied rehabilitation and/or reconstruction;
   ii. Repair and replacement of manufactured housing units;
   iii. Hazard mitigation;
   iv. Elevation;
   v. Relocation Assistance;
   vi. Demolition only;
   vii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services); and
   viii. Other activities associated with the recovery of single family housing stock impacted.

d. Ineligible Activities:
    i. Forced mortgage payoff;
    ii. Incentive payments to households that move to disaster-impacted floodplains;
    iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
    iv. Rehabilitation/reconstruction of homes located in the floodway;
    v. Rehabilitation/reconstruction of a house in which:
        1. The combined household income is greater than 120 percent AMI or the national median;
        2. The property was located in a floodplain at the time of the disaster; and
        3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
    vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
    vii. Homeowners located outside the city limits of Houston are ineligible to participate in the City of Houston HAP.

e. Eligibility Criteria for Assistance:
    i. Home must have been owner-occupied at the time of the storm;
    ii. Home must have served as primary residence;
    iii. Home must be located in the city of Houston;
    iv. Home must have sustained damage from Hurricane Harvey;
    v. Duplication of benefits review;
    vi. Costs for rehabilitation, reconstruction, and new construction are reasonable and consistent with market costs at the time and place of construction;
    vii. All applicants and co-applicants must be current on payments for child support;
    viii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;
    ix. Home must be environmentally-cleared;
    x. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
    xi. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits

compliance. This is an agreement to repay any duplicative assistance if other disaster assistance for the same purpose later is received.

xii. Unsecured Forgivable Promissory Note:

1. Assisted homeowners are required to maintain principal residency in the assisted property for three years. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for three years. A violation of this policy will activate the repayment terms of the Note.
2. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the State as applicable.
3. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the three-year note period.

f. National Objectives: LMI and urgent need. At least 70 percent of these program funds must be spent on LMI eligible projects.

g. Housing Guidelines: The GLO developed minimum housing guidelines that provide operational details on the eligibility requirements, housing assistance caps, construction standards, accessibility requirements, visitability standards, reporting requirements, and other program requirements.

h. Needs Assessment: The GLO will conduct a review the needs assessment completed by the City of Houston and approved by the GLO. The local needs assessment and analysis of HUD/FEMA demographic IA data recommended the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The GLO in partnership with the University of Texas at Austin conducted a housing needs survey over the entire disaster impacted counties. The survey assessed remaining unmet housing needs resulting from Hurricane Harvey. The needs assessment determined the activities to be offered, the demographics to receive concentrated attention, identify disabled, “special needs”, and vulnerable populations, and target areas to be served. The needs assessment also includes an assessment of the types of public services activities that may be needed to complement the program, such as housing counseling, legal counseling, job training, mental health, and general health services. The needs assessment set goals within the income brackets similar to the housing damage sustained within the impacted areas. Deviations from goals must be evaluated by the GLO before the Program may move forward.

i. Affirmative Marketing Outreach Plan: The GLO is committed to AFFH through established affirmative marketing policies. The GLO coordinated with HUD-certified housing counseling organizations in this effort. Affirmative marketing efforts will include an affirmative marketing plan, based on HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", gender groups, and vulnerable populations.

j. HAP Public Services: The GLO and other State Agencies or nonprofits having experience with homelessness prevention will administer the HAP public services activities. The public service will consist of three primary activities with the sole purpose of preventing homelessness in the region following Hurricane Harvey. This public service will be limited only to LMI households.

   i. Eligible Activities HCDA Section 105(a)(8) and 105(a)(20):
      1. Short-term Mortgage Assistance – The Short-Term Mortgage Assistance may deliver up to $10,000 to assist LMI households with mortgage payments on their primary residence. Mortgage assistance may not exceed 20 months. This program is intended to prevent foreclosure or predatory, low value buyouts of homes in the impacted areas and ensure that households can continue down the road to recovery without the imminent threat of homelessness.
      2. Utility Assistance – Utility Assistance Program will provide assistance up to $1,000 to LMI households to meet immediate utility needs. Utility assistance may include electricity, gas, wastewater, water and other utility bills and deposits.
      3. Tenant-Based Rental Assistance – Tenant-Based Rental Assistance will deliver rental assistance to LMI households in need of housing. This program may include up to 3 months of rental assistance, including security deposit and utility deposit. This program will be administered using HUD-published Fair Market Rent (FMR), and the maximum award amount per household will be tied to FMR.

   ii. Eligibility Criteria: Must be located within the city of Houston.

   iii. Ineligible: Activities located outside the city limits of Houston are ineligible.

   iv. National Objective: LMI

k. The program will undergo AFFH review. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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 I n response to natural hazard-related impacts.

l. Timeline: The proposed program start date is immediately after HUD's approval of Action Plan Amendment 7. The proposed end date is 7 years from the start date of the program.

4. Local Buyout and Acquisition Program

The Local Buyout and Acquisition Program will remove homes from harm's way. Due to the nature of this activity, this program will be administered by subrecipients (local units of government and entities with the power of eminent domain authority). Subrecipients are

encouraged to use buyouts and acquisition strategically as a means of acquiring contiguous parcels of land for uses compatible with open space, recreational, natural floodplain functions, wetlands management practices, or other ecosystem restoration.

The term ‘‘buyouts’’ as referenced in the Federal Register notice refers to the acquisition of properties with the intent to reduce risk from future flooding, or the acquisition of properties in Disaster Risk Reduction Areas as designated by the subrecipient.

Subrecipients that undertake a buyout program have the discretion to determine the appropriate valuation method, including paying either pre-disaster or post-disaster FMV. In most cases, a program that provides pre-disaster FMV to buyout applicants provides compensation at an amount greater than the post-disaster FMV. Any CDBG–DR funds in excess of the FMV are considered assistance to the seller, thus making the seller a beneficiary of CDBG–DR assistance. If the seller receives assistance as part of the purchase price, this may have implications for duplication of benefits calculations or for demonstrating national objective criteria, as discussed below. However, a program that provides post-disaster FMV to buyout applicants merely provides the actual value of the property; thus, the seller is not considered a beneficiary of CDBG– DR assistance.

Regardless of purchase price, all buyout activities are a type of acquisition of real property (as permitted by 42 U.S.C. 5305(a)(1)). However, only acquisitions that meet the definition of a ‘‘buyout’’ are subject to the post-acquisition land use restrictions imposed by this notice (subparagraph b. below). The key factor in determining whether the acquisition is a buyout is whether the intent of the purchase is to reduce risk of property damage in a floodplain or a Disaster Risk Reduction Area. When acquisitions are not acquired through a buyout program, the purchase price must be consistent with applicable uniform cost principles (and the pre-disaster FMV may not be used).

Subrecipients may redevelop an acquired property if the property is not acquired through a buyout program and the purchase price is based on the property’s post-disaster value, consistent with applicable cost principles (the pre-disaster value may not be used). In addition to the purchase price, subrecipients may opt to provide relocation assistance or housing incentives to the owner of a property that will be redeveloped if the property is purchased by the subrecipient through voluntary acquisition, and the owner’s need for additional assistance is documented. If the property is purchased through the use of eminent domain, the ultimate use of that property may not benefit a particular private party and must be for a public use. In addition, acquisition of real property through eminent domain is subject to the requirement of the Uniform Relocation Assistance (URA) Act including the requirements found in 49 CFR 24, subpart B. In carrying out acquisition activities, subrecipients must ensure they are in compliance with their long-term redevelopment plans.

Under the Local Buyout and Acquisition Program, each impacted COG has been allocated funds through the housing MOD. Each COG will develop a local MOD to allocate these funds to local units of government. The city of Houston, Harris County, local governments located within Harris County and entities located within Harris County are ineligible to receive an allocation through the MOD.

The MOD developed through the COGs allows for local control of the distribution of funds. Given the size of the impacted area and how Hurricane Harvey impacted each region differently, local control through a regional approach is vital to long-term recovery.

The GLO will provide training, written guidance, and forms to the impacted COGs for the development of the local MODs. Each COG will be provided data sets produced by the GLO in partnership with the University of Texas at Austin to inform MOD. Variances from these data sets will be allowable. Data sets provided by the GLO may contain information at the county, city, and/or ZIP code level. Applicant-specific data will not be available.

Local MOD guidelines will require that each COG follow a citizen participation process. Each COG is required to publish notice of any public hearings prior to holding the hearings. Notices shall be published in all newspapers of record for all eligible counties in the region, posted on the COG website and provided to all eligible cities and counties in the region. Hearings must fully comply with Texas Open Meetings Act.

The final MOD shall be posted on the COG's website for public comment prior to submission to the GLO. The public comment period shall be no less than 14 days. Each comment shall be responded to, and any changes made to the final MOD shall be noted in the response section for GLO review. The MODs must be completed 60 days from the GLO submission of the Action Plan to HUD or by a GLO-approved date.

Upon completion, the GLO will review and approve MOD submissions by each COG. All MODs will be wholly reviewed to ensure that each COG provides a detailed description of the methodology used to allocate and prioritize funds within their regions. If the MOD is not approved, the GLO will provide feedback including any specific issues to the COG.

a. Local MOD Requirements:
    i. Each COG will facilitate a MOD process with support of the GLO;
    ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);
    iii. Citizen participation process:
        1. Develop a citizen participation plan;
        2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;
        3. One (1) public hearing shall be a "Public Planning Meeting;"
        4. Ensure a public comment period of at least 14 days.
    iv. Implement a minimum of $1,000,000 in CDGB-DR funds to any local entity receiving funding through the MOD;
    v. Ensure a minimum percentage of funds are allocated to HUD MID Counties and ZIP Codes;
    vi. Facilitate local prioritization through the MOD;
    vii. A plan to meet the 70 percent LMI benefit requirement;
    viii. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

b. Allocation Amount: $99,750,750.99
    i. At least eighty (80) percent of funds must address unmet need in the HUD-MID areas (counties and ZIP codes);
    ii. Up to twenty (20) percent of funds may address unmet need in the State MID counties and counties minus its HUD MID ZIP codes.

c. Reallocation: As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

d. Eligible Entities: Units of local government and entities with the power of eminent domain authority.

e. Eligible Activities, HCDA Section 105(a)(1), 105(a)(7-8), 105(a)(24-25)
    i. Buyouts;
    ii. Acquisition;
    iii. Relocation Assistance with buyout or acquisition activities;
    iv. Down-payment Assistance with buyout or acquisition activities;
    v. Demolition with buyout or acquisition activities;
    vi. Housing incentives
    vii. Activities designed to relocate families outside of floodplains;
    viii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services);
    ix. FEMA Hazard Mitigation Grant Program (HMGP) cost share;
    x. Planning (up to 20% of local MOD allocation with GLO approval).

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

g. Program Guidelines: Each subrecipient will develop guidelines in accordance with CDBG-DR requirements and regulations to set maximum assistance amounts, target area locations, Disaster Risk Reduction Area, and additional eligibility requirements. Guidelines must be posted for public comment before use. The GLO must approve all guidelines. Subrecipients are required to develop and follow a RARAP.

    To conduct a buyout in a Disaster Risk Reduction Area, the subrecipient must establish criteria in its policies and procedures to designate the area subject to the buyout, pursuant to the following requirements:
    i. The hazard must have been caused or exacerbated by the Presidentially declared disaster for which the grantee received its CDBG–DR allocation;
    ii. The hazard must be a predictable environmental threat to the safety and well-being of program beneficiaries, as evidenced by the best available data (e.g. FEMA RL Data) and science; and
    iii. The Disaster Risk Reduction Area must be clearly delineated so that HUD and the public may easily determine which properties are located within the designated

area. The distinction between buyouts and other types of acquisitions is important, because subrecipient may only redevelop an acquired property if the property is not acquired through a buyout program (i.e., the purpose of acquisition was something other than risk reduction).

iv. In carrying out acquisition activities, subrecipient must ensure they are in compliance with their long-term redevelopment plans.

h. National Objectives: LMI, elimination of slum/blight, urgent need, low/mod buyout (LMB), and low/mod incentive.

i. All proposed buyout or acquisition programs will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination.

j. Timeline: The proposed program start date is 30 days after HUD's approval of this Action Plan. The proposed end date is 7 years from the start date of the program.

5. Homeowner Reimbursement Program

The GLO will administer the Homeowner Reimbursement Program for eligible expenses incurred by homeowners for repairs to a primary residence prior to application for these funds. Up to $50,000 per household may be reimbursed.

a. Allocation Amount: $102,951,722.12
   i. At least eighty (80) percent of funds must address unmet need in the HUDMID areas (counties and ZIP codes);
   ii. Up to twenty (20) percent of funds must may address unmet need in the State MID counties and counties minus its HUD MID ZIP codes;
   iii. The program will first be available to LMI households before being made available to non-LMI households.

b. Reallocation:
   i. As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

c. Maximum Award: $50,000

d. Eligible Activities, HCDA Section 105(a)(4):
   i. Expenses incurred by homeowners for repairs to a primary residence prior to application for these funds.

e. Ineligible Activities:
   i. Forced mortgage payoff;

ii. Incentive payments to households that move to disaster-impacted floodplains;
iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
iv. Rehabilitation/reconstruction of a homes located in the floodway;
v. Rehabilitation/reconstruction of a house in which:
    1. The combined household income is greater than 120 percent AMI or the national median;
    2. The property was located in a floodplain at the time of the disaster; and
    3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
        i. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
vi. Homeowners located within the city limits of Houston and/or within Harris County are ineligible to participate in the program.

f. Eligibility Criteria for Assistance:
    i. Home must have been owner-occupied at the time of the storm;
    ii. Home must have served as primary residence;
    iii. Home must be located in a CDBG-DR eligible county, with the exception of homes located within the city limits of Houston and/or within Harris County;
    iv. Home must have sustained damage from Hurricane Harvey;
    v. Duplication of benefits review;
    vi. All applicants and co-applicants must be current on payments for child support;
    vii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;
    viii. Home must be environmentally-cleared;
    ix. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
    x. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits compliance. Assisted homeowners must agree to repay any duplicative assistance if they later receive other disaster assistance for the same purpose.

xi. Unsecured Forgivable Promissory Note:
    1. Assisted homeowners are required to maintain principal residency in the assisted property for one year. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for one year. A violation of this policy will activate the repayment terms of the Note.
    2. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the Subrecipient.
    3. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the one-year period.

g. National Objective: LMI and urgent need.

h. The program will undergo AFFH review. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination.

i. Timeline: The proposed program start date is immediately after HUD's approval of this Action Plan. The program was closed in January of 2021.

6. Affordable Rental Program

The GLO will administer the Affordable Rental Housing Program. The program has been designed to provide funds for rehabilitation, reconstruction, and new construction of public housing and affordable multi-family housing projects in areas impacted by Hurricane Harvey. The GLO's Notice of Funding Availability (NOFA)/Request for Proposals (RFP) will establish the application process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Developments located within the city limits of Houston and/or within Harris County are ineligible for Affordable Rental Program.

a. Allocation for Activity: $586,629,497.40
    i. At least eighty (80) percent of funds must address unmet need in the HUD-MID areas (counties and ZIP codes).
    ii. Up to twenty (20) percent of funds may address unmet need in the State MID counties and counties minus their HUD MID ZIP codes.

b. Maximum Award: $25 million per development

c. Eligible Applicants: Acting individually or as participants in a limited partnership (LP) or limited liability corporation (LLC):
    i. For-profit Developers/ Borrowers;
    ii. Public housing authorities;
    iii. Units of local governments;

iv. Not-for-profit Developers/ Borrowers.

d. Eligible Activity, HCDA Section 105(a)(1), 105(a)(4), 105(a)(9), 105(a)(11), and 105(a)(14-15):
   i. Rehabilitation, reconstruction, and new construction of affordable multi-family housing projects.

e. Eligibility Criteria:
   i. Development must meet CDBG-DR eligibility requirements;
   ii. Development must be located in a CDBG-DR eligible county, with the exception of developments located within the city limits of Houston and/or within Harris County;
   iii. A minimum of 51 percent of the units must be restricted for a minimum affordability period of fifteen (15) years for the rehabilitation or reconstruction of multifamily rental projects with eight or more units, and a minimum affordability period of twenty (20) years for the new construction of multifamily rental units with five or more units for LMI individuals earning 80 percent or less of the AMFI at affordable rents. If a rental project that requires rehabilitation or reconstruction is subject to existing affordability requirements associated with other funding sources, the 15-year affordability period may run concurrently (or overlap) with the affordability requirements associated with such other funding;
   iv. Projects with eight (8) or more units must ensure construction costs are reasonable and consistent with market costs at the time and place of construction;
   v. The affordable rents must comply with High HOME Rents and other existing Land Use Restriction Agreement (LURA) restrictions, if applicable;
   vi. Property Types: Multifamily rental development is eight or more rental units under common ownership;
   vii. The Affordable Rental Program NOFA/RFP will clearly establish the application process and acceptance period, threshold criteria (including applicable building codes), selection criteria and the award process;
   viii. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so;
   ix. Project construction must be completed within 18 months of the effective date of the contract, unless otherwise extended.

f. Ineligible:
   i. Developments located within the city limits of Houston and/or within Harris County are ineligible;
   ii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any

personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

g. Selection Criteria:
    i. Located in High Opportunity Zones;
    ii. Targets extremely low-income (30 percent AMFI);
    iii. Exceeds the number of LMI units eligibility requirement;
    iv. Serves persons with disabilities beyond minimum requirements;
    v. Leverages public and private financing;
    vi. Activity type; and
    vii. Cost-effectiveness.

h. National Objective: Low- and moderate-income

i. All proposed developments will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

j. Timeframe: The proposed program start date is immediately after HUD's approval of this Action Plan. The proposed end date is 7 years from the start date of the program.

7. Partial Repair and Essential Power for Sheltering Program

The PREPS Program is currently administered by the GLO under FEMA PA. The program provides immediate, temporary repairs to homes that sustained less than $17,000 in FEMA-Verified Loss. FEMA determines applicants eligible for the PREPS program. FEMA closed the application period for FEMA IA assistance at the end of November 2017. As a PA program, FEMA will cover 90 percent of the expenses, and the GLO will use up to $35,000,000 of this allocation to cover repairs conducted on homes.

a. Allocation for Activity: $22,587,890.70
    i. At least eighty (80) percent of funds must address unmet need in the HUD-MID areas (counties and ZIP codes);
    ii. Up to twenty (20) percent of funds may address unmet need in the State MID counties and counties minus their HUD "MID ZIP codes.
b. Reallocation:

i. As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

c. Eligible Applicants: Approved FEMA Project Worksheet.

d. Eligible Activity: Payment of non-Federal share required in connection with a Federal grant-in-aid program; HCDA Section 105(a)(9)

e. National Objective: Urgent Need.

f. Timeframe: The program ended at the end of June 2018.

8. Local Infrastructure Program

The GLO recognizes that as part of a comprehensive long-term recovery program, the repair and enhancements of local infrastructure and mitigation efforts are crucial components. Infrastructure activities are vital not only for the long-term recovery and restoration of housing but for the long-term recovery and viability of communities. The local infrastructure program will provide disaster relief, long-term recovery, and restoration of infrastructure for local communities impacted by Hurricane Harvey. Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

Due to the nature of this activity, this program will be administered by the GLO, with local units of governments (cities and counties) as subrecipients.

Under the local infrastructure program, each impacted COG region has been allocated funds through the infrastructure MOD. Each COG will develop a local MOD for allocation of funds to local units of government. The GLO encourages the prioritization of infrastructure for direct repair of damaged facilities, FEMA cost share and mitigation, and water and flood control facilities due to the limitations of funds available in this allocation. The city of Houston, Harris County and local governments wholly located within the Harris County are ineligible to receive an allocation through the MOD.

The MOD developed through the COGs allows for the opportunity for local control for the distribution of funds. Given the size of the impacted area and how Hurricane Harvey impacted each region differently, local control through a regionally approach is vital to long-term recovery.

The GLO will provide training, written guidance, and forms to the impacted COGs for the development of the local MODs. Each COG will be provided data sets produced by the GLO in partnership with the University of Texas at Austin to inform MOD. Variances from these data sets will be allowable. Data sets provided by the GLO may contain information at the county, city, and/or ZIP code level.

Local MOD guidelines will require that each COG follow a citizen participation process. Each COG is required to publish notice of any public hearings prior to holding the hearings. Notices shall be published in all newspapers of record for all eligible counties in the region, posted on the COG website, and provided to all eligible cities and counties in the region. Hearings must fully comply with Texas Open Meetings Act.

The final MOD shall be posted on the COG's website for public comment prior to submission to the GLO. The public comment period shall be no less than 14 days. Each comment shall be responded to and any changes made to the final MOD shall be noted in the response section for GLO review. The MODs must be completed 60 days from the GLO submission of the Action Plan to HUD or a GLO-approved date.

Upon completion, the GLO will review and approve MOD submissions by each COG. All MODs will be wholly reviewed to ensure that each COG provides a detailed description of the methodology used to allocate and prioritize funds within their regions. If the MOD is not approved, the GLO will provide feedback to the COG, including specific issues.

a. Local MOD Requirements:
    i. Each COG will facilitate the MOD process with GLO support;
    ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);
    iii. Citizen participation process:
        1. Develop a citizen participation plan;
        2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;
        3. One (1) public hearing shall be a "Public Planning Meeting;"
        4. Ensure a public comment period of at least 14 days.
    iv. Implement a minimum of $100,000 in CDGB-DR funds to any local entity receiving funding through the MOD;
    v. Ensure a minimum percentage of funds are allocated to HUD MID Counties and ZIP codes;
    vi. Facilitate local prioritization through the MOD;
    vii. A plan to meet the 70 percent LMI benefit requirement;
    viii. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

b. Allocation Amount: $406,304,099.21
    i. At least eighty (80) percent of funds must address unmet need in the HUD MID areas (counties only) for applicable region;
    ii. Up to twenty (20) percent of funds may address unmet need in the remaining State MID counties.

c. Reallocation:
    i. As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

d. Eligible Entities: Units of local government (cities and counties)

e. Eligible Activities: Economic revitalization or infrastructure activities must contribute to the long-term recovery and restoration of housing. All activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11), including but not limited to:
   i. Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
   ii. Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
   iii. Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
   iv. Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business). Any projects funding for-profit entities must be evaluated and selected in accordance with guidelines (established in Appendix A to 24 CFR part 570) developed by HUD and comply with HUD underwriting guidance;
   v. Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).
   vi. Planning (up to 20% of local MOD allocation with GLO approval).
   vii. Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100- year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an ‘‘activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.’’ For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.
   viii. Cost Verification Controls must be in place to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

f. Ineligible Activities:
   i. CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
      1. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
      2. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
      3. Ensure the structure is accredited under the FEMA NFIP;

4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.

ii. Funds may not be used to assist a privately-owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a co-op or municipally-owned utility);

iii. Funds may not be provided to a for-profit entity for an economic development project under section 105(a)(17) of the HCDA unless such project has been evaluated and selected in accordance with guidelines developed by HUD pursuant to section 105(e)(2) of the HCDA for evaluating and selecting economic development projects;

iv. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);

v. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by FEMA, the USACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project;

vi. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is $250,000 or less;

vii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement;

viii. If the property is purchased through the use of eminent domain, the ultimate use of that property may not benefit a particular private party and must be for a public use;

ix. Activities located within the city of Houston and Harris County and local governments located wholly within the Harris County are ineligible.

g. National Objectives: LMI, elimination of slum/blight and urgent need.

h. All proposed projects must:

i. Promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks;

ii. Coordinate with local and regional planning efforts to ensure consistency, and promote community-level and/or regional (e.g., multiple local jurisdictions) post-disaster recovery and mitigation planning;
iii. Integrate mitigation measures into rebuilding activities and achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction;
iv. Consider the costs and benefits of the project;
v. Ensure that activities will avoid disproportionate impact on vulnerable populations such as, but not limited to, families and individuals that are homeless or at risk of homelessness, the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents.
vi. Ensure that activities create opportunities to address economic inequities facing local communities;
vii. Align investments with other planned state or local capital improvements and infrastructure development efforts, and work to foster the potential for additional infrastructure funding from multiple sources, including existing state and local capital improvement projects in planning, and potential private investment;
viii. Employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

i. All proposed projects will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

j. Timeline: The proposed program start date is 30 days after HUD's approval of this Action Plan. The proposed end date is 7 years from the start date of the program.

9. Harris County Flood Control District Program

The GLO recognizes that as part of a comprehensive long-term recovery program, the repair and enhancements of local infrastructure and mitigation efforts are crucial components. Flood and drainage improvement activities are vital not only for the long-term recovery and restoration of housing but for the long-term recovery and viability of communities. The Harris County Flood Control District (HCFCD) program will provide disaster relief, long-term recovery, and restoration of infrastructure for local communities within Harris County impacted by Hurricane Harvey as well as protect assets that have since been repaired from Hurricane Harvey. Each project must demonstrate how it will contribute to the long-term recovery and restoration of housing.

The creation of this program is from reallocated funds from Harris County Administered Disaster Recovery Program, City of Houston Administered Disaster Recovery Program, State-

Administered Harris County Homeowner Assistance Program, and the State Administered City of Houston Homeowner Assistance Program. The GLO has and will serve all eligible HAP applicants within the State-Administered Harris County Homeowner Assistance Program and the State-Administered City of Houston Homeowner Assistance Program.

a. Allocation Amount: $322,033,863
    i. One hundred (100) percent of funds must address unmet need in Harris County.

b. Eligible Entities: Harris County Flood Control District

c. Eligible Activities: Infrastructure activities must contribute to the long-term recovery and restoration of housing. All activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11), including but not limited to:
    i. Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
    ii. Green infrastructure; and
    iii. Other activities associated with flood and drainage improvements.
    iv. Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100- year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an ‘‘activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.’’ For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.
    v. Cost Verification Controls must be in place to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

d. Ineligible Activities:
    i. CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
        1. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
        2. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
        3. Ensure the structure is accredited under the FEMA NFIP;
        4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.

ii. Funds may not be used to assist a privately-owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a co-op or municipally-owned utility);
iii. Funds may not be provided to a for-profit entity for an economic development project under section 105(a)(17) of the HCDA unless such project has been evaluated and selected in accordance with guidelines developed by HUD pursuant to section 105(e)(2) of the HCDA for evaluating and selecting economic development projects;
iv. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
v. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by FEMA, the USACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project;
vi. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is $250,000 or less;
vii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement;
viii. If the property is purchased through the use of eminent domain, the ultimate use of that property may not benefit a particular private party and must be for a public use.

e. National Objectives: LMI, elimination of slum/blight and urgent need. At least 50 percent of these program funds must be spent on LMI eligible projects.

f. All proposed projects must:
i. Demonstrate tie-back to Hurricane Harvey;
ii. Promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks;
iii. Coordinate with local and regional planning efforts to ensure consistency, and promote community-level and/or regional (e.g., multiple local jurisdictions) post-disaster recovery and mitigation planning;

iv. Integrate mitigation measures into rebuilding activities and achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction;
v. Consider the costs and benefits of the project;
vi. Ensure that activities will avoid disproportionate impact on vulnerable populations such as, but not limited to, families and individuals that are homeless or at risk of homelessness, the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents.
vii. Ensure that activities create opportunities to address economic inequities facing local communities;
viii. Align investments with other planned state or local capital improvements and infrastructure development efforts, and work to foster the potential for additional infrastructure funding from multiple sources, including existing state and local capital improvement projects in planning, and potential private investment;
ix. Employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

g. All proposed projects will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

h. Timeline: The proposed program start date immediately after HUD's approval of Action Plan Amendment 12. The proposed end date is three years from the start date of the program.

10. Economic Revitalization Program

The major flood and wind damage caused by Hurricane Harvey continues to significantly impact millions of Texans, particularly thousands of small businesses, many of which are still struggling to maintain the capital necessary to remain open for business, the long-term effects of this storm have yet to be seen. Businesses who were not located in flood plains, like homes, were flooded. Areas were without access, power, and necessary utilities which prevented businesses not directly flooded from opening their doors for weeks in some cases. Whole communities were impacted thus changing the client base for many small neighborhood businesses.

For the first time, the GLO will directly implement an economic revitalization program that will provide interim assistance to businesses impacted by Hurricane Harvey through grants for:

- LMI-owned Microenterprises;

- Businesses that agree to create or retain jobs where at least 51 percent of jobs created/retained are for LMI persons;
- Businesses that provide goods or services to residents of a LMI residential area; or
- Addressing Urgent Need where the activity does not qualify under the LMI national objective.

The GLO will initiate a notice of funds availability and select a provider(s) with the appropriate background to serve businesses impacted by Hurricane Harvey.

The GLO recognizes that as part of a comprehensive long-term recovery program, economic revitalization is a crucial component. Economic revitalization activities are vital not only for the long-term recovery and restoration of housing through job creation and retention but for the long-term recovery and viability of communities and households. Each economic revitalization activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

a. Allocation Amount: $110,000,000
    i. At least eighty (80) percent of funds must address unmet need in the HUD MID areas (counties and ZIP codes);
    ii. Up to twenty (20) percent of funds may address unmet need in the State MID impacted counties and counties minus its HUD MID ZIP codes.

b. Reallocation:
    i. As appropriate and available, any remaining funds within this program will be reallocated to the Disaster Recovery Reallocation Program (DRRP) established in 2024.

c. Maximum assistance: No business may receive more than $250,000

d. Eligible Activities:
    i. Economic Revitalization activities allowed under CDBG-DR (HCDA Section 105(a)(14-15), 105(a)(17), 105(a)(19), and 105(a)(22)) include, but are not limited to, grants to small businesses as defined the SBA at 13 CFR part 121 or businesses engaged in "farming operations" that meet the U.S Department of Agriculture Farm Service Agency criteria described at 7 CFR 1400.500. Assistance will be provided pursuant to 24 CFR 570.201(o) and 24 CFR 570.203. Economic revitalization activities must contribute to the long-term recovery and restoration of housing."
    ii. Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical

Action is in the 100- year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an ‘‘activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.’’ For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

iii. Cost Verification Controls must be in place to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

e. Ineligible Activities:
   i. Assistance to businesses not defined as small businesses;
   ii. Assistance to any privately-owned utility;
   iii. Funds may not be provided to a for-profit entity for an economic development project under section 105(a)(17) of the HCDA unless such project has been evaluated and selected in accordance with guidelines developed by HUD pursuant to section 105(e)(2) of the HCDA for evaluating and selecting economic development projects;
   iv. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

f. Eligible Applicants:
   i. Small business located in CDBG-DR eligible county;
   ii. Small businesses as defined the SBA at 13 CFR part 121 or businesses engaged in “farming operations” that meet the U.S Department of Agriculture Farm Service Agency criteria described at 7 CFR 1400.500;
   iii. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.

g. National Objectives:
   i. LMC Microenterprises [24 CFR 570.208(a)(2)(iii)]
   ii. LMJ [24 CFR 570.208(a)(4)]
   iii. LMA [24 CFR 570.208(a)(1)
   iv. Urgent Need [24 CFR 570.208(c)]

h. All proposed projects will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

i. Timeline: The proposed program start date is 30 days after HUD's approval of this Action Plan. The proposed end date is 7 years from the start date of the program.

11. Disaster Recovery Reallocation Program (DRRP)

The State of Texas, as one of the states most affected by disasters across the country, consistently has insufficient funding to fully recover from its disasters. It is also the case that programs and subrecipients do not individually fully utilize all allocated funds. This Disaster Recovery Reallocation Program is designed to support the reallocation of those de-obligated and unutilized funds for much needed further recovery for disasters that occurred in 2008, 2015, 2016, 2017, 2018, and 2019. The Disaster Recovery Reallocation Program (DRRP) is designed to utilize these deobligated and unutilized amounts to provide the opportunity for communities with outstanding unmet need to access remaining CDBG-DR funds.

This program is designed to utilize remaining program funds from current disaster recovery grants from 2008 to 2019, with the exception of the 2011 Wildfires grant, and expedite the expenditure of funds to comply with HUD's timely expenditure requirements through a call for projects across multiple grants. Each project will undergo eligibility analysis based on the grant that will be used to fund it.

As funds continue to be identified through the de-obligation process, they will be added to this program. All remaining funds will be reallocated to this program for each grant.

The Disaster Recovery Reallocation Program (DRRP) supersedes any conflicting criteria of the Action Plan, as amended, while addressing the appropriate reallocation of unutilized funds that will be used in the DRRP.

a. Allocation Amount: $91,500,000

The GLO will ensure that DRRP-funded projects maintain overall HUD MID expenditures and LMI aggregate requirements.

b. Award Amount:
    i. Maximum Award: $20,000,000.

ii. Minimum Award: $500,000.

c. Eligible Entities: Units of local government (cities and counties), Indian Tribes, and public housing authorities.

d. Eligible Activities:
   i. Flood and drainage improvements.
   ii. Water and wastewater improvements.
   iii. Street improvements.
   iv. Rehabilitation, reconstruction, and new construction of affordable multifamily projects.
   v. Permanently affixed emergency communications equipment.

e. Ineligible Activities:
   i. Any activity not identified above.

f. Program Fund Restrictions:
   i. CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
      1. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
      2. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
      3. Ensure the structure is accredited under the FEMA NFIP; and
      4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
   ii. Funds may not be used to assist a privately owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a coop or municipally owned utility).
   iii. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by FEMA, the USACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential disaster declaration will not qualify unless the disaster directly impacted said project.
   iv. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG-DR funds that may be contributed to a USACE project is $250,000 or less.
   v. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received federal flood disaster assistance that was conditioned on the person first

having obtained flood insurance under applicable federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

g. National Objectives: Low- and Moderate-Income (LMI) and urgent need.

h. Project Selection: The GLO will hold a call for projects across all grants participating in the program, with each entity permitted to submit a maximum of three eligible projects. The GLO will select which funding source will be utilized to fund the project.

   The GLO will then rank projects using the criteria defined in the Selection Criteria Section below. This ranking will be used to inform the project selection in addition to a review of program eligibility and grant conditions. Approved submissions will be prioritized during the contracting process based on the expiration date of the grant being utilized.

i. Eligibility Criteria: The financial and management capacity of each entity and feasibility for the submitted project to be completed within the two-year time frame will be evaluated by the GLO for each submission. Additionally, each project must:
   i. Include one activity, one service area, and address one national objective;
   ii. Address unmet needs from applicable disasters and tie-back to the disaster event; and
   iii. Meet a HUD National Objective.

j. Selection Criteria:

Criteria	Maximum Points
HUD MID	10 Points Possible
Project is in a HUD MID area	*10 Points*
Project is in a State MID area	*0 Points*
LMI National Objective	20 Points Possible
Project meets the LMI national objective	*20 Points*
Project does not meet the LMI national objective	*0 Points*
Number of CDBG-DR Eligible Presidential Declarations from 2008 to 2019	20 Points Possible
10-12	*20 Points*
7-9	*15 Points*
4-6	*10 Points*
1-3	*5 Points*
Leverage	5 Points Possible
Entity has pledged to provide Non-CDBG Leverage (a minimum value of 10% of CDBG-DR funds requested)	*5 Points*
Entity has not pledged to provide Non-CDBG Leverage (a minimum value of 10% of CDBG-DR funds requested	*0 Points*
SoVI	15 Points Possible

Criteria	Maximum Points
High	*15 Points*
Medium High	*12 Points*
Medium	*9 Points*
Medium Low	*6 Points*
Low	*3 Points*
Composite Disaster Index	20 Points Possible
Top 10%	*20 Points*
Top 25%	*15 Points*
Top 75%	*10 Points*
Bottom 25%	*5 Points*
Bottom 10%	*0 Points*
Is the Applicant a Public Housing Authority?	10 Points Possible
Applicant is a Public Housing Authority	*10 Points*
Applicant is not a Public Housing Authority	*0 Points*
Tie-Breaker: Higher Poverty Rate	
*More details on scoring criteria will be available in the submission guidelines	

k. AFFH Review: All proposed projects will undergo AFFH review by the applicant before GLO approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination. Submissions 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.

l. Timeline: The proposed program start date is immediately after HUD's approval of this Action Plan Amendment. The proposed end date is two years from the start of the program.

12. Local, Regional and State Planning

In addition to enhancing the state's Disaster Recovery and Response Plan previously mentioned, the GLO has committed to the purposes of planning in the impacted area and the completion of some of the projects identified as a result of the studies. Because of the vast nature of the current disaster and the recurring nature of disasters in the region, the GLO may concentrate on regional approaches in addition to specific local solutions to promote sound long-term recovery. In order to provide an efficient and effective method of selecting and executing planning studies following Hurricane Harvey, the GLO will work with Texas universities and/or vendors (term which shall include, but not limited to, governmental entities, non-profit and for profit firms, entities, and organizations) to conduct studies with CDBG-DR funds. The GLO will utilize a local community survey process to include public meetings, requests for information, listening sessions, and written surveys to better determine the specific needs for planning studies. The GLO has set up an email account and is actively inviting communities to submit their planning needs to add to a comprehensive list of projects needed.

Once surveys have been gathered from local communities, the GLO will compile a total list of study needs in the impact area. Opportunities for regionalization will be considered and the GLO will work with the universities and/or vendors to identify qualified experts for specific tasks identified. This process and the availability of planning funds will standardize methods through regional coordination and planning at a level that has not yet been achieved through CDBG-DR funds in Texas.

The GLO may solicit responses from local governmental entities through more than one survey to determine local and regional priorities. Studies may include, but not limited to, flood control, drainage improvement, resilient housing solutions, homelessness, surge protection, economic development, infrastructure improvement or other efforts to further recovery from Hurricane Harvey, mitigate future damages, and establish plans for comprehensive recovery efforts. Through further amendments to this Action Plan, the GLO may make a portion of these planning funds available for a competitive application process allowing local governmental entities to apply for specific studies of their choosing. Additionally, further amendments may convert a portion of these planning funds to other eligible expenses to execute specific projects contemplated or developed through the planning process.

Communities may recommend studies to be completed, but all planning funds will be administered by the GLO. The GLO will make all final determinations regarding planning studies and coordinate with universities and/or vendors to identify scopes, the parameters of the planning efforts, and the type of data that they will gather. This approach will ensure planning studies that are conducted in different regions can be consolidated and analyzed. This will help to ensure that consistency and accuracy in data gathering is achieved.

The State will develop and maintain a secure database system that documents the impact of past disasters and provides analytical data assessing natural hazard risks, including anticipated effect of future extreme weather events and other natural hazards. This will enable the State to improve its disaster information, analytics capabilities, and foster communication, collaboration, and information gathering amongst relevant state agencies that have a role in disaster response and recovery. Additionally, the data gathered will inform both the state and local communities of possible solutions that plan for and create a more resilient landscape in the state of Texas.

a. Allocation Amount: $137,685,446
    i. At least eighty (80) percent of funds must benefit HUD MID and distressed areas (counties);
    ii. Up to twenty (20) percent of funds may benefit the State MID counties.

b. Eligible Activities: Eligible planning, urban environmental design, and policy-planning-management-capacity building activities as listed in 24 CFR 570.205, HCDA 105(a)(12)

c. Ineligible Activities: Planning activities located within the city of Houston, Harris County and local governments located within the Harris County. Harris County is developing and implementing its own planning activities.

d. Timeline: The proposed program start date is immediately after HUD's approval of this Action Plan. The proposed end date is 8 years from the start date of the program.

e. Planning activities should:

i. Promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks;
ii. Coordinate with local and regional planning efforts to ensure consistency, and promote community-level and/or regional (e.g., multiple local jurisdictions) post disaster recovery and mitigation planning;
iii. Integrate mitigation measures into rebuilding activities and achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction;
iv. Consider the costs and benefits of the project;
v. Ensure that activities will avoid disproportionate impact on vulnerable populations such as, but not limited to, families and individuals that are homeless or at risk of homelessness, the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents.
vi. Ensure that activities create opportunities to address economic inequities facing local communities;
vii. Align investments with other planned state or local capital improvements and infrastructure development efforts, and work to foster the potential for additional infrastructure funding from multiple sources, including existing state and local capital improvement projects in planning, and potential private investment;
viii. Employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

13. Administrative Funds

State administrative costs including subrecipient administration costs will not exceed five (5) percent, $246,833,793.00. Planning and administrative costs combined will not exceed 20 percent. The provisions outlined under 42 U.S.C. 5306(d) and 24 CFR §570.489(a)(1)(i) and (iii) will not apply to the extent that they cap state administration expenditures and require a dollar-for-dollar match of state funds for administrative costs exceeding $100,000. Pursuant to 24 CFR §58.34(a)(3), except for applicable requirements of 24 CFR §58.6, administrative and management activities are exempt activities under this Action Plan. Once contracted, the GLO will allow the drawdown of pre-agreement costs associated with eligible disaster recovery activities dating back to the date of the disaster for subrecipients and the GLO with appropriate documentation.

The GLO will retain the full 5 percent allocated for administrative costs associated with the CDBG-DR allocation for purposes of oversight, management, and reporting. The only exception is an allowance for up to 2.4 percent of program amounts for costs that require

administrative type activities in the Harris County and the City of Houston programs. Subrecipients for the local buyout and acquisition program may spend up to 12 percent of program amounts for costs directly related to implementation. Harris County and the City of Houston are allowed to spend up to 10 percent of program amounts for costs directly related to implementation of housing activities. Subrecipients, including Harris County are allowed to spend up to 6 percent for non-housing and infrastructure type activities for CDBG-DR grant awards $1 million or greater. For non-housing and infrastructure grant awards less than $1 million refer to GLO guidance found on the website, http://recovery.texas.gov/. Engineering and design activities will be capped at 15 percent of the total project award unless special services are necessary; subject to GLO approval. The GLO, Harris County, and the City of Houston will limit planning costs to 5 percent of each respective allocation to complete projects as defined in 24 CFR 570.205.

G. Harris County Use of Funds

Harris County received a direct allocation from the State's allocation at the direction of HUD. Because Harris County has elected to develop their own local recovery programs, except where noted in this Action Plan, Harris County has developed a local plan and submitted it to the GLO for HUD approval.

Harris County's local programs and requirements are outlined in section 5.2.

H. City of Houston Use of Funds

The City of Houston received a direct allocation from the State's allocation at the direction of HUD. Because the City of Houston has elected to develop their own local recovery programs, except where noted in this Action Plan, the City of Houston has developed a local plan and submitted it to the GLO for HUD approval.

Harris County's local programs and requirements are outlined in section 5.3.

I. Location

All CDBG-DR funded activities under this Action Plan will occur within the disaster-declared counties of FEMA DR-4332. For the purpose of this Action Plan, counties that received FEMA disaster declarations for emergency protective measures, including direct federal assistance, under the FEMA PA program are not included in the 49 CDBG-DR eligible counties.

J. Mitigation Measures

The GLO will require subrecipients to incorporate preparedness and mitigation measures into rebuilding activities. This helps to ensure that post-recovery communities are safer and stronger than prior to the disaster. Incorporation of these measures also reduces costs in recovering from future disasters. Subrecipients must describe how mitigation measures will be integrated into rebuilding activities and the extent to which infrastructure activities funded through this grant will

achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk.

K. National Objectives

All CDBG program national objectives are expected to be utilized in the execution of Hurricane Harvey recovery efforts. For urgent need activities, each subrecipient receiving CDBG-DR funds will document how all activities or projects funded under the urgent need national objective respond to a disaster-related impact, identified by the subrecipients as the CDBG certification requirements for documentation of urgent need, located at 24 CFR 570.483(d), are waived for the grants under Federal Register Notice, Vol. 83, No. 23, Friday, February 8, 2018.

At least 70 percent of the aggregate of CDBG-DR program funds will be used to support activities that benefit LMI persons.

5.2. Harris County Administered Disaster Recovery Program

A. Connection to Unmet Needs

Harris County was HUD identified as one of the "most impacted and distressed" areas in the State's Action Plan and Federal Register, Vol. 83, No. 28, February 9, 2017. Harris County or the GLO will manage this direct allocation. This local SAP primarily considers and addresses unmet housing by allocating 69 percent of CDBG-DR funding to housing related activities. Harris County has developed its program categories based on need and the County's public consultation process. Housing programs include residential buyout program, homeowner reimbursement program, affordable rental program, homeowner assistance program, and single family new construction program. The programs were developed to meet CDBG-DR, federal and state requirements, and regulations, and to implement the long-term recovery of housing as efficiently and expeditiously as possible. It is anticipated that public service type activities may need to be utilized to complement these housing programs. Public service activities may include, but are not limited to, case management, housing counseling, legal counseling, job training, mental health, and general health services.

The majority of the funds have been allocated to assist renters through the affordable rental program (acquisition, rehabilitation, and new construction of affordable rental units) and homeowners through the reimbursement of repairs. Funds have been allocated for residential buyouts and acquisition to remove homes from harm's way and to complement the removal of unsafe housing.

Through Harris County's continued work with homeless populations and in partnership with the Coalition for the Homeless of Houston/Harris County, the county recognizes the need for homeless services to include homelessness prevention and housing of homeless populations. Based on Hurricane Harvey's impact, homelessness in the county has and will continue to rise without these services, short-term mortgage assistance, utility assistance, and tenant-based rental assistance.

Although there are remaining unmet housing needs due to the limitation of funds available, Harris County recognizes that as part of a comprehensive long-term recovery program, the repair and enhancements of local infrastructure and mitigation efforts are crucial components. Infrastructure activities are vital not only for the long-term recovery and restoration of housing but for the long-term recovery, protection, and viability of communities. Especially drainage improvements projects in channels and bayous as well as local neighborhood drainage systems are needed to reduce the flood risk of these areas. Twenty-four and seventy-five hundredths percent (24.75%) of the funds will address unmet needs related to infrastructure and economic development.

Harris County has allocated three and seventy-six hundredths percent (3.76%) for planning activities. The county will seek to develop studies on the need for affordable housing post-Harvey including market analysis, countywide sewer and drainage improvement, and mitigation study, among others.

A summary of Harris County's unmet need is identified in the table below. As required, a needs assessment was completed to identify long-term needs and priorities for CDBG-DR funding

allocated as a result of Hurricane Harvey. The assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors. The needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed communities, and includes details for housing, infrastructure, and economic revitalization. The needs assessment is expected to be amended as additional information is available or updated.

Table 56: Harris County Summary of Total Unmet Need (Updated APA 20)

Category	Losses/Gap	CDBG-DR Investments*	Other Known Investments	Remaining Unmet Need
Housing	**$ 7,458,498,829**	**$(614,537,359)**	**$(3,671,644,866)**	**$ 3,172,316,604**
Owner-Occupied Housing	$ 1,729,324,743		$ -	$ 1,729,324,743
Residential Property Insurance/TX Windstorm	$ 1,644,387,050		$(1,411,214,085)	$ 233,172,965
National Flood Insurance Program	$ 1,894,715,877		$(1,894,715,877)	$ -
Other Housing and Disaster Related Expenses	$ 760,850,000		$ (65,000,000)	$ 695,850,000
Rental-occupied Housing	$ 628,287,775		$ -	$ 628,287,775
Public Housing Authority Housing	$ 933,384		$ (714,904)	$ 218,480
31)	$ 800,000,000		$ (300,000,000)	$ 500,000,000
Infrastructure	**$ 10,868,969,302**	**$(216,462,646)**	**$ (698,910,323)**	**$ 9,953,596,333**
FEMA PA	$ 868,774,302		$ (679,910,323)	$ 188,863,979
Rebuild Texas	$ 10,000,195,000		$ (19,000,000)	$ 9,981,195,000
Economic Development	**$ 136,634,250**	**$ -**	**$ (39,287,300)**	**$ 97,346,950**
SBA Loans	$ 39,287,300		$ (39,287,300)	$ -
Business Loans	$ 62,346,950		$ -	$ 62,346,950
Commercial Buyout	$ 35,000,000	$ -	$ -	$ 35,000,000
Grand Total	**$ 18,464,102,381**	**$(831,000,005)**	**$(4,409,842,489)**	**$ 13,223,259,887**

*CDBG-DR investments does not include the state-run Harris County Homeowner Assistance Program and the Harris County Flood Control District Program

B. Harris County Quality of Construction

Harris County will require both quality inspections and code compliance inspections on all construction projects. Site inspections will be required on projects to ensure quality and compliance with the Harris County Affordable Housing Standards and any building codes. The county will encourage local subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable.

All rehabilitation (meets the definition of substantial improvement), reconstruction, or new construction of housing must meet the requirements outlined in the Harris County Affordable Housing Standards, which includes but is not limited to standards for overall construction, green building requirements, environmental and hazard mitigation, accessible design, and local building code compliance. The Standards can be found on the Harris County Community Services Department website at:

https://hcd.harriscountytx.gov/Governance/Plans-and-Reports?category=Harris+County+Affordable+Housing+Standards

C. Rehabilitation and Reconstruction Cost-Effectiveness

Cost-effectiveness will be considered for all residential rehabilitation and reconstruction projects relative to other alternatives. The County will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation or reconstruction program. The policies and procedures will address criteria for determining when the cost of rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property owner, such as buyout or acquisition of the property, or the construction of area-wide protective infrastructure, rather than individual building mitigation solutions designed to protect individual structures. These policies and procedures will follow the Federal Register Vol. 83, No 157 regarding Rehabilitation and Reconstruction Cost-Effectiveness.

D. Harris County MOD

Under the local infrastructure program, Harris County will conduct a County level MOD process. Harris County will encourage the prioritization of infrastructure for direct repair of damaged facilities, FEMA cost share and mitigation, and water and flood control facilities due to the limitations of funds available in this allocation. A methodology for the distribution and calculation to local small cities within Harris County will be established for CDBG-DR infrastructure funding. For those cities that are partially in Harris County, only the portion of the city that resides within Harris County will be eligible for the MOD. The MOD will balance relative impact of Hurricane Harvey on the jurisdiction's population, percentage of the jurisdiction's population that is low-to-moderate-income, and the ability to recover and total unmet need. The MOD is further discussed in Section IV.E.7.B of this document.

E. Program Budget

Table 57: Total Allocation Budget – Harris County (Updated APA 20)

Program		HUD Most Impacted Areas	State Most Impacted Areas	LMI Amount	Total	% of Total Harris County Allocation	% of Total Harris County Allocation	Total
Harris County Housing	Homeowner Assistance Program	$ 48,225,717.00	$ -	$ 37,000,000.00	$ 48,225,717.00	5.43%	69.26%	$ 614,537,359.00
	Residential Buyout Program	$ 218,113,514.00	$ -	$ 158,206,036.00	$ 218,113,514.00	24.58%		
	Reimbursement Program	$ 46,123,171.00	$ -	$ 23,000,000.00	$ 46,123,171.00	5.20%		
	Affordable Rental Program	$ 235,971,727.00	$ -	$ 235,971,727.00	$ 235,971,727.00	26.59%		
	SF New Construction	$ 66,103,230.00	$ -	$ 60,081,117.00	$ 66,103,230.00	7.45%		
Harris County Infrastructure	Commercial Buyout Program	$ 17,830,933.00	$ -	$ 17,830,933.00	$ 17,830,933.00	2.01%	24.39%	$216,462,646.00
	Method of Distribution (Local)	$ 128,405,786.00	$ -	$ 89,884,050.00	$ 128,405,786.00	14.47%		
	Competitive Application	$ 70,225,927.00	$ -	$ 49,158,148.00	$ 70,225,927.00	7.91%		
Harris County Public Services	Public Services	$ 1,332,245.00	$ -	$ 1,290,966.00	$1,332,245.00	0.15%	0.15%	$1,332,245.00
Harris County Planning	Harris County Planning	$ 33,017,028.00	$ -	N/A	$33,017,028.00	3.72%	6.20%	$55,002,734.00
Harris County Housing Administration	Harris County Administration	$ 21,985,706.00	$ -	N/A	$21,985,706.00	2.48%		
Harris County Allocation Subtotal (before admin)		$865,349,278.00	$ -	$672,422,977.00	$ 865,349,278.00			
Harris County Allocation Subtotal (after admin)		$887,334,984.00	$ -	$672,422,977.00	$887,334,984.00			

F. Use of Funds

HUD has allocated $5.024 billion in CDBG-DR funding to the State of Texas in response to Hurricane Harvey, FEMA DR 4332, through the Federal Register, Vol. 83, No. 28 (PL 115-56). Harris County was identified as a "most impacted and distressed" area and was allocated by the State, along with the City of Houston, a direct allocation from the State's CDBG-DR allocation at the direction of HUD of $1,204,696,185. This includes an additional $89,309,355 allocated in August 14, 2018 Federal Register (PL 115-123), which will be used for housing recovery in the county. Harris County will allocate not less than 70 percent of the aggregate of CDBG-DR program funds to be used to support activities benefitting low- to moderate-income persons.

As the county is a HUD identified "most impacted and distressed" area and all funding will be used in the county, Harris County will meet the requirement to spend 80 percent of funds in a HUD identified "most impacted and distressed" area. With the increased CDBG-DR allocation under Public Law 115-123, the county will expand the following housing programs: 1) Homeowner Assistance and 2) Rental Housing Development, to will address the long-term need of improved affordable housing. The Administration allocation is 2.48 percent of funding and the planning allocation is 3.76 percent of funding (see Table 57 Harris County Total Allocation Budget). The eligibility criteria for these programs is unchanged and is consistent with the program requirements for use of funds described below.

1. Harris County Homeowner Assistance Program

The Harris County Homeowner Assistance Program (HCHAP) will rehabilitate and reconstruct owner-occupied single-family homes damaged by Hurricane Harvey.

Harris County will develop local housing programs and will be responsible for the implementation of each program. Homeowners located within the city limits of Houston and outside of Harris County will be ineligible for participation in the HCHAP.

Harris County will administer the HCHAP in accordance with the latest needs assessment and housing guidelines. This program will include owner-occupied housing rehabilitation and reconstruction. Harris County will also provide temporary financial assistance to homeowners to prevent homelessness where such homeowners are still displaced due to the disaster or are in the process of completing repairs to their primary residence to meet habitability standards. The activity will consist of two primary services with the sole purpose of preventing homelessness in the region following Hurricane Harvey. This activity will be limited only to LMI households.

Harris County has established standards for housing contractors in its Homeowner Assistance Program Guidelines found on the County's disaster recovery website at www.harrisrecovery.org under Section 6: Building Contractor Procurement & Selection Process. Builders will submit a proposal under a Request of Proposals competition. To ensure a full and open competition, the County will follow federal procurement and contract requirements outlined in 2 CFR 200.318–200.326.

Owner-Occupied Housing Rehabilitation and Reconstruction

a. Allocation Amount: $48,225,717.00
    i. The program will first be available to FEMA/GLO temporary direct housing participants and LMI homeowners prior to being made available to non-LMI homeowners.
b. Reallocation:
    i. If the program is unable to obligate funds by the GLO specified date, any unobligated funds will be reallocated the state-run Harris County Homeowner Assistance Program.

c. Maximum assistance:
    i. Rehabilitation: Assistance will be based on the home evaluation work write-up estimate, but not greater than $80,000. Harris County has selected to have a maximum assistance cap that is higher than the State's rehabilitation maximum assistance as median housing price and repair costs will be higher than the average of the State as the county's average square foot per home is higher. The County has submitted a waiver and justification to the GLO to increase the maximum assistance.

    ii. Reconstruction: Standardized cost estimate based on household size. Local composite builder bid amount based on procured builders and the procured house plans. The maximum amount allowable for reconstruction is $148 per square foot, excluding elevation/foundation and other building activities based on jurisdictional requirements. Eligible applicants that require elevation may qualify for up to an additional $50,000 for elevation as a part of reconstruction.

    iii. Additional information on assistance can be found in Harris County's Homeowner Assistance Program Guidelines.

d. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8), 105(a)(11), 105(a)(20), 105(a)(25), and 83 FR 5844, paragraph VI.B.32 (*42 U.S.C. 5305(a) and 24 CFR 570.207(b)(3) is waived and alternative requirements adopted to the extent necessary to permit new housing construction*) include but are not limited to:
    i. Single family owner-occupied rehabilitation, reconstruction, and/or new construction;
    ii. Repair and replacement of manufactured housing units;
    iii. Hazard mitigation for recovery activities;
    iv. Elevation;
    v. Relocation Assistance;
    vi. Demolition only;
    vii. Public service within the 15 percent cap (such as housing counseling, legal counseling, job training, mental health, and general health services); as well as mortgage and utilities assistance for homeowners impacted by Hurricane Harvey and enrolled in the HCHAP as follows;

1. Case Management Services – Case management services will be provided to assist households, particularly LMI households, impacted by Hurricane Harvey to navigate temporary relocation and assistance, find resources for unmet needs for recovery, and other barriers to recovery. Assistance may not exceed 24 months.
2. Short-term Mortgage Assistance – The Short-Term Mortgage Assistance will deliver up to $10,000 to assist LMI households impacted by Hurricane Harvey with mortgage payments on their primary residence. Mortgage assistance may not exceed 20 months. This program is intended to prevent foreclosure or predatory, low-value buyouts of homes in the impacted areas and ensure that households can continue down the road to recovery without the imminent threat of homelessness. Applicants must demonstrate a financial need to prevent foreclosure, or delinquency on current mortgage for their primary residence.
3. Utility Assistance – Utility Assistance Program will provide assistance up to $1,000 to LMI households impacted by Harvey Hurricane to meet immediate utility needs. Utility assistance may include electricity, gas, wastewater, water, and other utility bills and deposits. Assistance will be provided for current and future bills but not those in arrears.

The County will ensure that these programs are made accessible to individuals having wide-ranging disabilities including mobility, sensory, developmental, emotional, and other impairments. Intake and program servicing and meeting facilities will be accessible per the Americans with Disabilities Act (ADA). In accordance with 24 CFR 8.6, the County will indicate on correspondence materials disseminated to clients and prospective clients how to access information through alternative means if they have an impairment, disability, or language barrier, etc. Additionally, written communication will ask clients and prospective clients whether they need assistance for mobility impairments, visual or hearing impairments, or other disabilities. Additional information is available in the Harris County Housing Guidelines.

viii. Other activities associated with the recovery of single-family housing stock impacted.

e. Ineligible Activities:
   i. Forced mortgage payoff;
   ii. Incentive payments to households that move to disaster-impacted floodplains;
   iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
   iv. Rehabilitation/reconstruction of homes located in the floodway;
   v. Rehabilitation/reconstruction of a house in which:
      1. The combined household income is greater than 120 percent AMI or the national median;
      2. The property was located in a floodplain at the time of the disaster; and

3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

vii. Homeowners located within the city limits of Houston and/or outside of Harris County are ineligible to participate in the HCHAP.

f. Eligibility Criteria for Assistance/Selection Criteria:

i. Home must have been owner-occupied at the time of the storm;

ii. Home must have served as primary residence;

iii. Home must be located in Harris County outside the City of Houston;

iv. Home must have sustained damage from Hurricane Harvey;

v. Duplication of benefits review;

vi. All applicants and co-applicants must be current on payments for child support;

vii. Applicant must be a U.S. Citizen or eligible resident;

viii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;

ix. Home must be environmentally-cleared;

x. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.

xi. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits compliance. This is an agreement to repay any duplicative assistance if other disaster assistance for the same purpose later is received.

xii. Deferred Payment Loan/Forgivable Promissory Note:

1. Assisted homeowners are required to maintain principal residency in the assisted property for five years. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for five years. A violation of this policy will activate the repayment terms of the Note.
2. Deferred payment loan offered at zero interest only payments and are to be forgiven at a prorated monthly rate over the five-year term, and secured by a deed of trust.

3. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the subrecipient or State as applicable.
4. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the five-year note period.

g. National Objectives: LMI and urgent need. At least 70 percent of these program funds by region and Subrecipient must be spent on LMI eligible projects.

h. Housing Guidelines: Harris County will develop minimum housing guidelines that provide operational details on the eligibility requirements, housing assistance caps, construction standards, accessibility requirements, visitability standards, reporting requirements, and other program requirements. Housing guidelines will be posted for public comment before use. The GLO must approve all guidelines.

i. Needs Assessment: Harris County will conduct needs assessment. The local needs assessment and analysis of HUD/FEMA demographic IA data will recommend the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The needs assessment will determine the activities to be offered, the demographics to receive concentrated attention, and target areas to be served. The needs assessment should set goals within the income brackets similar to the housing damage sustained within the impacted areas. Deviations from goals must be approved by the GLO before the Program may move forward.

j. Affirmative Marketing Outreach Plan: Harris County is committed to AFFH through established affirmative marketing policies. Harris County will coordinate with HUD-certified housing counseling organizations in this effort. Affirmative marketing efforts will include an affirmative marketing plan, based on HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", and gender groups.

k. Timeline: The proposed program start date is immediately after HUD’s approval of this Amendment to the Action Plan. The proposed end date is August 2025.

2. Harris County Residential Buyout Program

The Residential Buyout Program will purchase properties and remove homes from areas of severe flood risk and that are hopelessly deep in the floodplain to assist homeowners and tenants to move out of harm’s way through an involuntary buyout program. Purchased properties will be used for flood management and will not be redeveloped for residential or commercial use. This program will generate program income. Proceeds collected from Residential Manufactured Sites with lease agreements prior to tenant relocation and final disposition will generate program income. Proceeds collected will be used to fund HUD eligible projects that achieve the Low to Moderate Income national objective. The County

will be required to develop a program income Standard Operating Procedures (SOP) to the maximum extent feasible to detail how program income will be used or distributed.

Due to the nature of this activity, this involuntary buyout program will be administered by Harris County and HCFCD.

a. Allocation Amount: $218,113,514.00

b. Reallocation:
    i. If the program is unable to obligate funds by the GLO specified date, any unobligated funds will be reallocated the state-run Harris County Homeowner Assistance Program.

c. Eligible Entities: Harris County and will operate this program in partnership with HCFCD.

d. Eligible Activities, HCDA Section 105(a)(1), 105(a)(7-8), and 105(a)(24-25) for residential buyout activities:
    i. Buyouts;
    ii. Acquisition;
    iii. Relocation Assistance with buyout activation (under URA and 24 CFR 42.350);
    iv. Optional Relocation Assistance Under 24 CFR 570.606 (d)
    v. Down-payment Assistance, which can be combined with buyout activities;
    vi. Demolition only;
    vii. Housing incentives;
    viii. Activities designed to relocate families to a location of reduced flood risk;
    ix. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, general health services, and case management services). Case management services – Case management services will be provided to assist households, particularly LMI households impacted by Hurricane Harvey for temporary relocation, find resources for unmet needs for recovery, and other barriers to recovery. Assistance may not exceed 20 months. The County will ensure that these programs are made accessible to individuals having wide-ranging disabilities including mobility, sensory, developmental, emotional, and other impairments. Intake and program servicing and meeting facilities will be accessible per the ADA. In accordance with 24 CFR 8.6, the County will indicate on correspondence materials disseminated to clients and prospective clients how to access information through alternative means if they have an impairment, disability, language barrier, etc. Additionally, written communication will ask clients and prospective clients whether they need assistance for mobility impairments, visual or hearing impairments, or other disabilities. Additional information is available in the Harris County Housing Guidelines; and
    x. FEMA HMGP cost share.

e. Ineligible Activities: Incentive payments to households that move to disaster-impacted floodplains with equal or greater risk than their original location. Activities located within

the city limits of Houston and/or outside of Harris County are ineligible to participate in the program for buyout.

f. Program Guidelines: Harris County will develop guidelines in accordance with CDBG-DR requirements and regulations to set maximum assistance amounts, target area locations, and additional eligibility requirements. Guidelines must be posted for public comment before use. The GLO must approve all guidelines. If required, eminent domain may be used in accordance with applicable federal, state, and local law or ordinances to acquire needed property.

g. National Objectives: LMI, LMA, elimination of slum/blight, urgent need, low/mod buyout (LMB), and low/mod housing incentive (LMHI).

h. Selection Criteria:
   i. Properties located in Harris County but outside the city of Houston.
   ii. Properties in identified CDBG-DR Buyout areas or where rehabilitation or reconstruction is prohibited by environmental factors.
   iii. Priority will be given to LMI households.

i. Timeline: The proposed program start date is 30 days after HUD's approval of this Amendment to the Action Plan. The proposed end date is August 2026.

3. Single Family Affordable Housing Preservation Program

This program has been cancelled and the funds from this program have been reallocated to the Harris County Homeowner Reimbursement Program.

4. Homeowner Reimbursement Program

Harris County will administer the Homeowner Reimbursement Program for eligible expenses incurred by homeowners for repairs to a primary residence prior to application for these funds. Up to $50,000 per household may be reimbursed.

a. Allocation Amount: $46,123,171.00
   i. The program will give priority to LMI households.

b. Maximum Award: $50,000

c. Eligible Activities, HCDA Section 105(a)(4):
   i. Expenses incurred by homeowners for repairs to a primary residence prior to the applicable Federal deadline for repairs.

d. Ineligible Activities:
   i. Forced mortgage payoff;
   ii. Incentive payments to households that move to disaster-impacted floodplains;

iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
iv. Rehabilitation/reconstruction of homes located in the floodway;
v. Rehabilitation/reconstruction of a house in which:
    1. The combined household income is greater than 120 percent AMI or the national median;
    2. The property was located in a 100-year floodplain at the time of the disaster; and
    3. The property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. The program may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
vii. Homeowners located within the city limits of Houston and/or outside of Harris County are ineligible to participate in the program.

e. Eligibility Criteria for Assistance/Selection Criteria:
    i. Home must have been owner-occupied at the time of the storm;
    ii. Home must have served as primary residence;
    iii. Home must be located within Harris County and outside the city limits of Houston;
    iv. Home must have sustained damage from Hurricane Harvey;
    v. Duplication of benefits review;
    vi. All applicants and co-applicants must be current on payments for child support;
    vii. Applicant must furnish evidence that property taxes are current, have an approved payment plan, or qualify for an exemption under current laws;
    viii. Applicant must be a U.S. Citizen or eligible resident;
    ix. Home must be environmentally-cleared;
    x. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
    xi. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to Hurricane Harvey to ensure duplication of benefits compliance. Assisted homeowners must agree to repay any duplicative assistance if they later receive other disaster assistance for the same purpose.

xii. Deferred Payment Loan/ Forgivable Promissory Note:
   1. Assisted homeowners are required to maintain principal residency in the assisted property for one year. Cash-out refinancing, home equity loans or any loans utilizing the assisted residence as collateral are not allowed for one year. A violation of this policy will activate the repayment terms of the Note.
   2. Deferred payment loan offered at zero interest only payments and are to be forgiven at a prorated monthly rate over the one-year term, and secured by a deed of trust.
   3. Taxes are to be paid and in good standing for the properties assisted. Homeowners may be on a payment plan, but it needs to be submitted to the subrecipient or State as applicable.
   4. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the one-year note period.

f. National Objective: LMI and urgent need.

g. Timeline: The proposed program start date is immediately after HUD's approval of this Amendment to the Action Plan. The proposed end date is August 2025.

5. Affordable Rental Program

Harris County will administer the Affordable Rental Housing Program.

The program has been designed to provide funds for acquisition, rehabilitation, reconstruction, and new construction of affordable rental housing projects in areas impacted by Hurricane Harvey, as well as case management services for displaced renter households. Harris County's NOFA/Request for Applications will establish the application process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Case management services will be delivered by Harris County directly. This program will generate program income from interest loan payments as recorded in executed Loan Agreements. Proceeds collected from the interest loan payments will be used to fund HUD eligible projects that achieve the Low to Moderate Income national objective. The County will be required to develop a program income Standard Operating Procedures (SOP) to the maximum extent feasible to detail how program income will be used or distributed.

a. Allocation for Activity: $235,971,727.00
b. Maximum Award: $25 million per development (Harris County may request a waiver to exceed on a case by case basis).

c. Eligible Applicants: Acting individually or as participants in a LP or LLC:
   i. For-profit Developers/ Borrowers;
   ii. Public housing authorities;
   iii. Units of local governments;
   iv. Not-for-profit Developers/ Borrowers.

d. Eligible Activity, HCDA Section 105(a)(1), 105(a)(4), 105(a)(9), 105(a)(11), and 105(a)(14-15) and 83 FR 5844, paragraph VI.B.32:
    i. Rehabilitation, reconstruction, and new construction of affordable rental housing projects.
    ii. Public Services within the 15 percent cap (e.g., housing counseling, housing navigation and case management). These services are to assist those who were displaced by Hurricane Harvey find safe, quality rental housing, and promote housing stabilization. The County will ensure that these programs are made accessible to individuals having wide-ranging disabilities including mobility, sensory, developmental, emotional, and other impairments. Intake and program servicing and meeting facilities will be accessible per the ADA. In accordance with 24 CFR 8.6, the County will indicate on correspondence materials disseminated to clients and prospective clients how to access information through alternative means if they have an impairment, disability, language barrier, etc. Additionally, written communication will ask clients and prospective clients whether they need assistance for mobility impairments, visual or hearing impairments, or other disabilities. Additional information is available in Harris County Housing Guidelines.

e. Eligibility Criteria:
    i. Development must meet CDBG-DR eligibility requirements.
    ii. Development must be located within Harris County and outside the city limits of Houston except in certain cases where the City and County partner on projects that provide rental housing. For these County approved projects, particularly with a city partner project, where no other funding sources are available, or the partner was unable to fulfill their funding obligation, it may be necessary for the County to provide additional CDBG-DR funding and to proceed with the project without the City partnership and within the City limits. The County may also invest CDBG-DR funding inside the City when the City has indicated no funding is available to award to the requesting project to ensure that affordable rental housing and housing choice is available for all Harris County residents.
    iii. A minimum of 51 percent of the units must be restricted for an affordability period of fifteen (15) years for a rehabilitation/reconstruction projects and twenty (20) or more years for new construction for LMI individuals earning 80 percent or less of AMFI at affordable rents.
    iv. The affordable rents must comply with High/Low HOME Rents and additional rental limits for tenants that are extremely low income as described in Harris County's Affordable Rental Housing Program Guidelines, and other existing LURA restrictions, if applicable.
    v. Property Types: Multi-family rental development is eight or more rental units under common ownership and single-family rental of four or more rental units under common ownership.

vi. The Harris County Affordable Rental Program NOFA/RFP will clearly establish the application process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process.
vii. Project construction must be completed within 18 months of the effective date of the contract, unless otherwise extended.
viii. The Harris County Affordable Rental Program will prioritize a set-aside of supportive housing of at least 5 multi-family units.
ix. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
x. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ''repair, replacement, or restoration'' for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

f. Ineligible: Developments located outside of Harris County are ineligible. Developments located inside the City of Houston are also ineligible except in the case stated above under Eligibility Criteria: item ii regarding partnerships between the jurisdictions and availability of funding.

g. Primary Selection Criteria:
i. Located in High Opportunity Zones; and areas of revitalization as demonstrated by other public and/or private investments in such areas; [50]
ii. Targets extremely low-income (30 percent AMFI or less);
iii. Priority to exceeding of the number of LMI units eligibility requirement;
iv. Priority to serving of persons with disabilities beyond minimum Section 504 requirements, providing more accessible units;
v. Prioritizes the providing of supportive housing, particularly to persons with disabilities;
vi. Leverages public and private financing; (may request waiver to fully fund certain developments to expedite project completion);
vii. Activity type; and

[50]As directed by HUD, Harris County will pursue a balanced approach in investing in both High Opportunity areas as well as constructing and improving multi-family affordable housing stock in revitalization areas that may be located near buyout interest areas as a means of improving and preserving community stability.

viii. Cost-effectiveness.

h. National Objective: LMI.

i. Timeframe: The proposed program start date is immediately after HUD's approval of this Amendment to the Action Plan. The proposed end date is February 2026.

6. Harris County Single Family New Construction Program

Harris County struggled to keep pace with housing demand pre-Hurricane Harvey, and now the ability to provide a comprehensive single-family focused development solution, associated with Hurricane Harvey recovery is even more exacerbated. Over the next 4 years, Harris County in partnership with HCFCD, will be acquiring approximately 2,000 homes through a buyout program funded by Hazard Mitigation Grants and CDBG-DR. In a period where the local housing stock is low or in flood prone areas, quality replacement homes, especially affordable homes, will be impossible to find in Harris County. This could be exacerbated by the dismantling of whole communities after a buyout program.

The Harris County Single Family New Construction Program will replace affordable single-family housing stock by developing new housing and, with program income improving newly constructed housing in areas of reduced risk of flooding. To meet this challenge, Harris County will implement innovative solutions for promoting and partnering with local homebuilders to create new inclusive communities that offer a wide variety of housing choice and construction solutions that lends toward resilience investments.

As a public/private partnership approach, Harris County will build on national community development and housing finance models that promote quality larger scale neighborhood development for LMI families that is context sensitive and aims toward implementing mixed-income/mixed use development styles. LMI families affected by flooding especially those experiencing repetitive flooding, will enjoy opportunities to relocate with their neighbors from these flood prone areas, thus preserving community cohesion, sustaining the local tax base, and local institutions such as schools, and other community assets.

The program will specifically link new single-family construction investments with LMI families, and the CDBG-DR eligibility requirements associated with benefiting LMI individuals earning 80 percent or less of the annual AMFI levels. Further, a new residential subdivision development would qualify for CDBG-DR eligible investment (e.g., land acquisition, infrastructure for residential development) if 51 percent or greater of the units in a single development will be occupied by LMI households, thus qualifying under the LMI national objective, just as a multifamily complex would qualify where 51 percent or greater of the total units are dedicated for LMI households. Harris County will leverage its success with public/private partnerships by identifying and qualifying developer/builder interests that have the prerequisite development experience and financial capacity to mix financing, such as private equity and other non-CDBG-DR funding, for the development of property and the construction of homes above the 80 percent of AMFI limits.

In cases where subsidies for the construction of homes are provided to builders/developers, individual housing units will be sold to LMI homebuyers. This will apply with both in-fill and new development projects. In-fill development will help enhance and strengthen existing neighborhoods located in reduced flood risk areas by creating more opportunities for new affordable housing while also expanding the local housing stock.

As a separate initiative under this program, the county will identify LMI target areas in need of community revitalization and that were highly impacted by Hurricane Harvey and other recent disaster events. These areas will need a comprehensive approach to improve housing, infrastructure, and facilities to achieve reduced future flood loss and improve resilience. It is the county's intent as we improve housing through rehabilitation, reconstruction, and new construction to also improve the neighborhood's drainage and other infrastructure that serve those homes in the LMI target area. If the drainage and infrastructure issues are not corrected, any repairs or new construction of housing will be flooded in the next disaster event in the same manner as these homes were affected by the 2016 Floods and Hurricane Harvey.

Additionally, this approach will be aligned with the referenced "Balanced Approach" that will invest in both High Opportunity areas as well as improving affordable housing stock in revitalization areas that may be located near Hurricane buyout interest areas as a means of improving and preserving community stability and cohesion. Besides the private housing market, LMI households seeking housing will have access to a larger market of affordable housing both in high opportunity and revitalization areas with this program.

This program will generate program income from the sale of Single Family New Construction homes. Proceeds collected from the sale will be used to fund HUD eligible projects that achieve the Low to Moderate Income national objective. The County will be required to develop a program income Standard Operating Procedures (SOP) to the maximum extent feasible to detail how program income will be used or distributed.

Comprehensive Single-Family Development

The program will include a spectrum of activities, depending on the selected development model (refer to models described below), that involves a partnership between the Community Services and the County Engineering Department – and developer/builder interests – where the Engineering Department identifies land in consultation with CSD, and if approved and the project meets feasibility criteria, a contractor is procured to develop the infrastructure (streets, sidewalks, water, sanitary sewer, storm sewer, and detention) for the property (Engineering is the designated department lead for infrastructure and site development), and builders are selected to construct homes, with Harris County (Community Services lead) marketing and selling the homes to qualified families. Alternatively, a comprehensive developer model would entail 1) a "turn-key model" that may involve a developer proposing a site for department consideration followed by construction services and marketing and sale of homes; or, 2) Harris County identifying and delivering the land to the project, and a developer is selected through an RFP process to develop the property, construct homes, and market and sell homes to a combination of LMI families, and to families above the 80 percent AMI threshold. Separately, families qualifying under Urgent Need would income qualify from 81-120 percent AMI.

The comprehensive approach would involve: predevelopment site, neighborhood, and market analysis to determine the feasibility of market demand and housing type preferences; property acquisition; subdivision land planning; infrastructure development; marketing and sale of lots to qualified builders; construction of homes and home sales to LMI families and market-rate homes. Downpayment subsidies, conventional financing, or alternative financing consideration for families that may not meet the current credit score, or debt vs. income underwriting, and credit and homebuyer counseling are program facets of this comprehensive single-family development and construction program.

Downpayment Assistance Program

Qualified applicants may be eligible to receive financial assistance in the form of a forgivable loan to be used towards a downpayment on a new home, including eligible prepaids and/or closing costs. Assistance amount will be limited to the amount necessary to achieve homeownership. Assistance will be provided in the form of a deferred forgivable loan, secured by a deed of trust for the affordability period (as detailed in the program guidelines).

Single Family Development and Construction Models

Harris County shall implement the program under several models to ensure the necessary flexibility required to deliver the maximum number of units within the funding timeframe. These eligible development models include but are not limited to the following:

Model 1

- Harris County acquires suitable and feasible land for single family development, related amenities (partner relationship between CSD and Engineering Department);
- Harris County Engineering Department through the bid process obtains an A&E firm to develop the land's infrastructure;
- Developer(s) procured, or contractors hired by Harris County will build; and
- Harris County or their procured contractor will market and sell the homes.

Model 2

- Harris County acquires land;
- Developer procured by Harris County will:
  - Develop the infrastructure;
  - Build the homes; and
  - Market and sell the homes.

Model 3

- Harris County acquires built single-family home; and
- Harris County markets and sells the homes.

Model 4

- Harris County procures a Developer(s);
- Developer(s) procured by Harris County will:

- Acquire land;
- Design and develop the infrastructure;
- Build the homes; and
- Market and sell the homes

Model 5

- Harris County develops Partnerships with other entities such as (but not limited to):
  - Public Housing Authorities
  - Units of Local Governments
  - Non-Profits Organizations
- Partner(s) acquires land or provides land (already owned by Partner)
- Partnership either procures a Developer or acts as a Developer
- Developer will:
  - Design and develop the infrastructure;
  - Build the homes; and
  - Market and sell the homes.

Model 6

- Builder(s) leverage existing housing product;
  - Units must be able to pass TREC Inspection or Harris County Minimum Property Standards
- Builder(s) to provide existing completed or soon to be completed homes.

Program Funding, Eligibility, and Program Income

Eligible activities include those permissible under section 105(a) of the Act (Title I of the Housing and Community Development Act of 1974) and the federal regulations at 24 CFR Part 570 which govern the repair, rehabilitation, reconstruction, or new construction (including acquisition, demolition, site clearance, and remediation) under the Single-Family New Construction Program. CDBG funds may be used for the construction of housing assisted under section 17 of the United States Housing Act of 1937. This program will generate program income which will be spent on HUD -DR eligible activities under this program while the contract with Harris County is active and any remaining program income funds may be retained at closeout for use by Harris County's Community Development Block Grant (CDBG) Entitlement Program.

a. Allocation for Activity: $66,103,230.00

b. Maximum Award: $25 million per development/developer (Harris County may grant a waiver to exceed on a project by project basis)

c. Eligible Applicants: Applicants acting individually or as participants in a nonprofit corporation, a LP or LLC, other legally formed entity eligible to apply for CDBG-DR funding:

   i. For-profit Developers/ Borrowers;

ii. Public housing authorities;
iii. Units of local governments; or
iv. Not-for-profit Developers/ Borrowers.

d. Eligible Activity, HCDA Section 105(a)(1), 105(a)(4), 105(a)(9), 105(a)(11), and 105(a)(14-15); A waiver eligible under 83 FR 5844 permits new housing construction:
   i. New construction of affordable single-family housing.
   ii. Acquisition.
   iii. Infrastructure for housing development. Infrastructure for housing development to include design and construction of water and wastewater lines, connects and facilities; utilities, storm sewer; detention; SWPPP; irrigation; mitigation (sound, floodplain, etc.); fencing; streets, streetlights, signage and sidewalks/trails; school bus shelters; landscaping and resident recreation areas; trenching; and other concrete work.
   iv. Down Payment Assistance.
   v. Public Services within the 15 percent cap (e.g., housing counseling, credit clean-up, legal services, case management). These services are to assist LMI homebuyers to access homeownership opportunities being created in the developments. The County will ensure that these programs are made accessible to individuals having wide-ranging disabilities including mobility, sensory, developmental, emotional, and other impairments. Intake and program servicing and meeting facilities will be accessible per the ADA. In accordance with 24 CFR 8.6, the County will indicate on correspondence materials disseminated to clients and prospective clients how to access information through alternative means if they have an impairment, disability, language barrier, etc. Additionally, written communication will ask clients and prospective clients whether they need assistance for mobility impairments, visual or hearing impairments, or other disabilities. Additional information is available in the Harris County Housing Guidelines.

e. Eligibility Criteria
   i. Development must meet CDBG-DR eligibility requirements;
   ii. Development must be located within Harris County and outside the city limits of Houston except in certain cases where the City and County may partner on projects that will serve both City and County residents to include:
      - Projects that are adjacent to the city/county line,
      - Projects where a portion of the project serves to house homeless households, or
      - Project where, in partnership with a local Housing Authority, a portion of the project serves eligible households, particularly large sized households and those household seeking housing self-sufficiency.
   iii. A minimum of 51 percent of the units must be restricted for LMI individuals earning 80 percent or less of the AMFI at affordable rents.
   iv. The sales price for each single-family residence will not exceed the appraised value of the home and land or total development cost of the unit, whichever is less. The sales price for any home that received additional funding from the HOME program

will be the lowest maximum price between the requirements in this action plan and the HOME program;

v. Property Types: Single-family development, in-fill development, and single-family new constructed homes/lots.

vi. The Harris County Single Family Development Program NOFA/RFP will clearly establish the application process and acceptance period, threshold criteria (including applicable building codes), selection criteria and the award process.

vii. The affordability period for the homebuyer is at least 5 years up to 10 years with a minimum of a 5-year affordability period. The affordability period for any home that received additional funding from the HOME program will be the most stringent between the requirements in this action plan and the HOME program. The homebuyer must occupy the home as his/her principal residence throughout the affordability period. Recapture is triggered by a transfer of ownership, either voluntary or involuntary, during the established affordability period. Harris County will enforce the provision through an agreement with the homebuyer and a recorded deed of trust and note.

viii. Project construction must be completed within 24 months of the effective date of the contract, unless otherwise extended.

f. Ineligible: Developments located outside of Harris County are ineligible. Developments located inside the City of Houston are also ineligible except in the case stated above under Eligibility Criteria: item ii.

g. Primary Selection Criteria (for contiguous developments):
   i. Priority given to locations in High Opportunity Zones and areas of revitalization as demonstrated by other public and/or private investments. [51]
   ii. Includes targets for extremely low-income (30 percent AMFI) homebuyers;
   iii. Meets the number of LMI units eligibility requirement;
   iv. Serves persons with disabilities beyond minimum requirements;
   v. Leverages public and private financing;
   vi. Activity type; and
   vii. Cost-effectiveness.

h. National Objectives: LMI

i. Timeline: The program start date was February 11, 2019. The end date for Model 1 and Model 3 projects is August 31, 2026. The end date for Models 2, 4, 5, and 6 projects is February 2026.

7. Local Infrastructure Program

[52] As directed by HUD, Harris County will pursue a balanced approach in investing in both High Opportunity areas as well as improving affordable housing stock in revitalization areas that may be located near buyout interest areas as a means of improving and preserving community stability.

Harris County recognizes that as part of a comprehensive long-term recovery program the repair and enhancements of local infrastructure and mitigation efforts[52] are crucial components. Infrastructure activities are vital not only for the long-term recovery and restoration of housing, but also for the long-term recovery and viability of communities. The local infrastructure program will provide disaster relief, long-term recovery, and restoration of infrastructure for Harris County communities impacted by Hurricane Harvey. Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing. Harvey floodwaters observed no political or demographic boundaries, but their impact on our vulnerable and economically distressed communities was especially devastating. The majority of the projects we will undertake are in disadvantaged communities and seek to alleviate historical inequities and disproportionate impacts. Harris County anticipates that the improvements to the infrastructure in these areas will foster a compounding positive influence far beyond the physical improvements that will support continued recovery and encourage future investment and development in those communities for years to come.

The County will ensure to the best extent possible that mitigation measures are integrated into rebuilding activities and infrastructure activities will achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction. Harris County will ensure that mitigation, planning, and policy objectives are considered for all projects. Generally, the County's intent is to deliver projects that will harden and protect infrastructure against future risks. Specifically, mitigation measures will concentrate on reducing the risk of structural flooding.

The County is keenly aware that we will be delivering projects using taxpayer funds, and appreciate that opportunity. The County makes it a priority to be fiscally responsible and considers costs and benefits, which includes ensuring that project spending is appropriate, reasonable, and provides the best benefit possible for our constituents. The County is taking advantage of multiple investment resources to address our infrastructure needs, including but not limited to bond funds approved by Harris County voters, FHWA funds, and FEMA funds. We will continue to actively seek funding and partnership opportunities as we progress toward full recovery from Harvey and a more resilient future.

Premature obsolescence would be an unacceptable condition for any project the County delivers, regardless of the source of funds. This situation can be avoided by using sound state of the art engineering and/or architectural practices in the development and design of projects. Specifying appropriate materials and technologies for the work and conditions and ensuring construction is completed as required by plans and specifications is also critically important. Harris County routinely delivers the design and construction of dozens of infrastructure projects, from routine to highly complex, annually. Our constituents expect and deserve projects that will serve their intended purpose well, do not require excessive repair or modification during their lifespan, and do not need to be replaced before their intended

[52] Mitigation efforts - Harris County will take measures to acquire commercial properties located in areas in which Harris County intends to preserve open space or establish flood storage/overflow. This is part of holistic community approach to help relocate residents and businesses to areas in close proximity to original locations to preserve community character and financial structure.

lifecycle completion due to failure to consider and avoid factors that contribute to premature obsolescence.

Harris County will operate its local infrastructure program as a subrecipient to the GLO.

Activity 1: Harris County Commercial Buyout Program

This program is in conjunction with the Residential Buyout Program.

Harris County Commercial Buyout Program will purchase commercial properties, where the owner has agreed to sell, in communities that have suffered from multiple disasters or are at a high-risk of suffering from additional disasters, such as properties in the 100-year floodplain. As with residential buyouts, properties targeted for commercial buyout will be located in areas in which Harris County intends to preserve open space or establish flood improvements. This is part of a holistic community approach to help relocate residents and businesses that have been devastated by Hurricane Harvey. Harris County will follow the URA, if required, and will provide relocation payments and assistance to displaced businesses. Harris County will attempt, as much as possible to help relocate communities in close proximity to original locations to preserve community character and financial structure.

a. Allocation Amount: $17,830,933.00

b. Eligible Entities: Harris County will operate this program in partnership with HCFCD.

c. Eligible Activities, HCDA Section 105(a)(1), 105(a)(7-8), and 105(a)(11)
   i. Buyouts;
   ii. Acquisition;
   iii. Relocation Assistance under URA and 24 CFR 42.350
   iv. Business Re-establishment assistance under URA
   v. Optional Relocation Assistance under 24 CFR 570.606 (d)
   vi. Assistance with buyout activities;
   vii. Demolition only;
   viii. Activities designed to relocate businesses outside of floodplains under 24 CFR 42.350; and
   ix. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

d. Ineligible Activities: Activities located within the city limits of Houston and/or outside of Harris County are ineligible to participate in the program.

e. Program Guidelines: Harris County will develop guidelines in accordance with CDBG-DR requirements and regulations to set maximum assistance amounts, target area locations, and additional eligibility requirements. Guidelines must be posted for public comment before use. The GLO must approve all guidelines. If required, eminent domain may be used in accordance with applicable federal, state, and local law or ordinances to acquire needed property.

f. National Objectives: LMI, elimination of slum/blight, and urgent need.

g. Selection Criteria:
   i. Commercial properties located in Harris County but outside the city of Houston.
   ii. Commercial properties in identified CDBG-DR buyout areas.
   iii. Priority will be given to LMI households.

h. Timeline: The proposed program start date is 30 days after HUD's approval of this Amendment to the Action Plan. The proposed end date is February 2026.

Activity 2: Harris County MOD

Under the local infrastructure program, Harris County will conduct a County level MOD process. Harris County will encourage the prioritization of infrastructure for direct repair of damaged facilities, FEMA cost share and mitigation, and water and flood control facilities due to the limitations of funds available in this allocation.

Harris County will follow a citizen participation process as a part of the MOD development. Harris County is required to publish notice of any public hearings prior to holding the hearings. Notices shall be published in all newspapers of record for all eligible cities, posted on the Harris County Community Services Department's website, and provided to all eligible cities in the MOD. Hearings must fully comply with Texas Open Meetings Act.

The final MOD shall be posted on the Harris County Community Services Department's website for public comment prior to submission to the GLO. The public comment period shall be no less than 14 days. Each comment shall be responded to and any changes made to the final MOD shall be noted in the response section for GLO review. The MODs must be completed 60 days from the GLO submission of the Amendment to the Action Plan to HUD.

Upon completion, Harris County shall submit MOD to the GLO for review and approval.

a. Harris County MOD Requirements:
   i. Harris County will facilitate the MOD process with GLO support;
   ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);
   iii. Citizen participation process:

1. Develop a citizen participation plan;
2. Conduct a minimum of two public hearings prior to finalizing the MOD;
3. One of the public hearings shall be identified as a "Public Planning Meeting;"
4. Personal and website notice must be sent at least five days prior to each public hearing;
5. Public notice of each hearing must be published in at least one regional newspaper three or more days in advance of the hearing.
6. Ensure a public comment period of at least 14 days.

iv. Implement a damage level threshold of $1,500,000 in CDGB-DR funds to any local entity receiving funding through the MOD;
v. Facilitate local prioritization through the MOD;
vi. Any funding not applied for or used by the entity allocated funding will be returned to Harris County to be used in their allocation;
vii. Any amendments reallocating funding will be published on the Harris County Community Services Department's website for at least 14 days and submitted to GLO for approval. If Harris County cannot expend the funding, the funding will be returned to the State for re-allocation;
viii. Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be the discretion of Harris County within cities in Harris County and outside the city limits of Houston;
ix. A plan to meet the 70 percent LMI benefit requirement;
x. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

b. Allocation Amount: $128,405,786.00

c. Eligible Entities: Units of local government (cities and Harris County, excluding the City of Houston)
d. Eligible Activities: Infrastructure activities must contribute to the long-term recovery and restoration in support of housing. All activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11), including but not limited to:
   i. Acquisition in support of infrastructure and public facilities activities (including drainage and floodplain management);
   ii. Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
   iii. Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.) in support of housing;
   iv. Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
   v. Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);

vi. Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

e. Ineligible Activities:
   i. CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
      1. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
      2. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
      3. Ensure the structure is accredited under the FEMA NFIP;
      4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
   ii. Funds may not be used to assist a privately-owned utility for any purpose;
   iii. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
   iv. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by FEMAUSACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
   v. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is $250,000 or less.
   vi. Activities located outside of Harris County or within the city limits of Houston are ineligible.

f. National Objectives: LMI, elimination of slum/blight and urgent need.

g. Selection Criteria:
   i. Priority will be given to projects that benefit LMI households or communities.
   ii. Priority will be given to the repair and improvement of Harvey-affected homeless shelter facilities, critical infrastructure, public safety buildings and drainage facilities.

h. Timeline: The proposed program start date is 30 days after HUD's approval of this Action Plan. The proposed end date is February 2026. Individual project extensions may be permitted at the discretion of the GLO.

Activity 3: Harris County Competitive Request for Proposal Program

The Harris County competitive RFP program will solicit proposals from Harris County and affiliated small cities to repair and rebuild infrastructure/facilities impacted by Hurricane

Harvey. The intent of the RFP is to provide funding for local infrastructure improvements to include:

- Improvements to storm-water/drainage
- Expansion of water and wastewater facilities to serve underserved areas of the County
- Construction of roads
- Rehabilitation, reconstruction, or construction of emergency shelters and public facilities
- Traffic signal resilience and
- Other critical infrastructure/facilities repairs and enhancements

After the damage caused by Hurricane Harvey, much needed repairs and enhancements will dramatically improve public, residential, and commercial concerns by mitigation flooding, rescuing storm water on roadways and properties, coveting storm water into the appropriate channels, as well as provide shelter to displaced residents.

a. Allocation Amount: $70,225,927.00

b. Eligible Entities: Units of local government (excluding the city of Houston), Independent School Districts, non-profits, and publicly-owned utilities within Harris County boundaries

c. Eligible Activities: Infrastructure activities must contribute to the long-term recovery and restoration of housing. All activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11), including but not limited to:
    i. Acquisition in support of infrastructure and public facilities activities (including drainage and floodplain management);
    ii. Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
    iii. Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
    iv. Demolition, rehabilitation of publicly or privately-owned commercial or institutional or industrial buildings, and code enforcement;
    v. Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
    vi. Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

d. Ineligible Activities:
    i. CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
        1. Register and maintain entries regarding such structures with USACE National Levee Database or National Inventory of Dams;

2. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
3. Ensure the structure is accredited under the FEMA NFIP;
4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.

ii. Funds may not be used to assist a privately-owned utility for any purpose;

iii. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);

iv. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursed by FEMA, USACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

v. By law, (codified in the HCD Act as a note to 105[a]), the amount of CDBG–DR funds that may be contributed to a USACE project is $250,000 or less.

vi. Activities located outside of Harris County or within the city limits of Houston are ineligible.

e. National Objectives: LMI, elimination of slum/blight, and urgent need.

f. Timeline: The proposed program start date is 30 days after HUD's approval of this Action Plan. The proposed end date is February 2026. Individual project extensions may be permitted at the GLO's discretion.

g. Selection Criteria
   i. Priority will be given to projects that benefit LMI households or communities.
   ii. Priority will be given to the repair and improvement of Harvey affected homeless shelter facilities, critical infrastructure, public safety buildings and drainage facilities.
   iii. Priority will be given to projects that provide leveraging funding to the project.

h. Harris County Competitive Requirements
   i. Any amendments reallocating funding will follow Harris County's citizen participation requirements;
   ii. Reallocation of funds from de-obligated projects and/or cost savings from completed projects will be the discretion of Harris County within cities in Harris County and outside the city limits of Houston.

8. Harris County Public Service

Harris County recognizes that many of its residents, particularly vulnerable populations, have unmet needs and will require special circumstances to aid in their recovery. Homes were flooded, personal possessions were lost, and lives suffered major upheavals. Vulnerable

populations are often less able to recover from disaster impacts, which could directly affect their job prospects and housing options. The lingering effects of this damage has impacted resident's physical and mental health and disrupted the family unit.

Almost immediately after Hurricane Harvey, the call for needed resources from those affected populations was heard. Based on a Rice University Kinder Institute for Urban Research report, *Hurricane Harvey Relief Fund Needs Assessment Phase Two*, almost 90,000 calls were placed to the 211 system between October 15, 2017 and November 30, 2017. Approximately one-third of those calls were requests for assistance for a Hurricane Harvey related issue. During this time, 39 percent of calls were from callers 30 to 49 years of age, with the top requests for disaster case management, rent payment assistance, disaster food stamps, and temporary financial assistance. For those over 65 years, comprising 13.5 percent of calls, similar requests were made with the addition of disaster specific home repair. The report highlighted that those over 50 years of age would maintain the highest call volume over the time period, showing the potential issue in securing assistance. These needs have not lessened with the passage of time.

Public services offered will provide a comprehensive approach to recovery for County residents. These services will support residents to find housing, remedy housing issues, or to become more resilient in future disasters, whether they be natural, economic, or personal, creating a stronger more prepared community. Services will be made accessible to individuals with wide-ranging disabilities through varying outreach strategies, partnerships with organizations serving people with disabilities, and making accommodations, as needed.

Services may include but are not limited to housing counseling, legal assistance, transportation services, fair housing services, health/mental health services, employment training, workforce development, and other services to address the needs of those impacted by Hurricane Harvey. Housing counseling and legal assistance services will assist in furthering fair housing by addressing housing barriers. Employment training and workforce development programs, including those that support housing recovery and housing construction, will address the need for job skills to support the county's recovery. In addition, workforce development will help boost long-term recovery by supplying residents of impacted communities with the necessary skills and opportunities to increase household income. To address the needs of those impacted who have become homeless or are at risk of becoming homeless, services may include case management, and other services to assist in housing and/or rehousing and housing stability for this population.

The provision of public services is also intended to assist residents in preparing and qualifying for housing programs. Remedying title or tax issues through legal services and providing housing counseling for LMI communities may prepare more residents to become eligible for programs such as county's Homeowner Assistance, Buyout and Rental Programs.

a. Allocation Amount: $1,332,245.00

b. Maximum Award: $1,500,000 per contract

c. National Objective: LMI benefit

d. Eligible Activity: Eligible activities include the provision of public services as listed in HCDA Sec. 105(a)(8)

e. Eligible Entities: Eligible entities are Harris County public services programs and subrecipients that are determined through an application or RFP process and include non-profit agencies. Harris County residents will receive assistance directly through the selected expanded county program or subrecipients. All program providers will ensure services are open to all residents, including those with limited English proficiency or other special needs populations.

f. Selection Criteria: For those projects and subrecipients selected through an application or NOFA/RFP process, there will be a clear established process and acceptance period, threshold criteria, selection criteria, and the award process. Selection criteria and any beneficiary requirements will be established in the Public Services guidelines, NOFA/RFP, or application. Selection criteria will likely include: the activity and need, cost, activity management, and experience/past performance.

g. Public services will be provided to primarily LMI persons or persons in LMI areas. This may include, but not limited to those that need public services to assist them in accessing housing programs or becoming eligible for housing programs. Receiving public services offered may not be contingent upon also receiving services through the housing programs offered.

h. Timeframe: The proposed program start date is immediate as these programs were support in other programs that have been approved by HUD and are being consolidated into a Public Services program under this amendment. The proposed end date is February 2026.

9. Harris County Planning

Well-thought-out and inclusive planning paves the way for effective and efficient implementation of projects and activities. The planning process is iterative, with each phase overlapping and informing the others. Harris County will invest sufficient planning funds to accurately identify unmet needs, which will ensure that projects are implemented in a manner to achieve successful completion.

a. Allocation Amount: $33,017,028.00

b. Eligible Activities: Eligible planning, urban environmental design, and policy-planning-management-capacity building activities as listed in 24 CFR 570.205, HCDA 105(a)(12)

c. Ineligible Activities: Planning activities located outside of Harris County or within the city limits of Houston except where such studies intersect: 1) regional/market analysis of housing, fair housing and housing-related topics and 2) hazard mitigation and drainage improvements related to the assets maintained by HCFCD.

d. Timeline: The proposed program start date is immediately after HUD's approval of this Amendment to the Action Plan. The proposed end date is February 2027.

e. Prioritization of Activities: Planning activities will be prioritized as follows:
   i. Activities for planning and operations of disaster response and recovery programs, including policy-planning and management-capacity building.
   ii. Planning Studies including but not limited to studies or plans for flood control, drainage improvement, affordable housing and fair housing, emergency management/operations, disaster response and recovery, health, infrastructure improvements, or other efforts to further recovery from Hurricane Harvey or mitigate future disasters and establish plans for comprehensive response and recovery efforts.

10. Administrative Funds

Harris County administrative costs will not exceed 2.48 percent, $21,985,706 of the total allocation, which will be provided from the State's Administrative Funds set-aside. This is in compliance with the State's plan. The GLO will allow up to 10 percent of program amounts for costs directly related to implementation of housing activities and 6 percent of infrastructure/non-housing activities. The GLO has capped engineering and design activities at 15 percent of the total project award, unless special services are necessary and are subject to GLO approval. The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is August 2026.

Harris County intends to utilize, expend and seek reimbursement for Pre-Award cost, in compliance with 570.200(h), for planning, purchase and expansion of software systems, standing up of intake and call centers for housing programs, program management and administrative functions.

11. National Objective

It is expected all the national objectives will be utilized in the execution of the Hurricane Harvey recovery effort. For urgent need activities, each subrecipient receiving CDBG-DR funds will document how all activities or projects funded under the urgent need national objective respond to a disaster-related impact identified by the subrecipients. The CDBG certification requirements for documentation of urgent need, located at 24 CFR 570.483(d), are waived for the grants under this notice.

At least 70 percent of the aggregate of CDBG-DR program funds will be used to support activities that benefit LMI persons.

5.3. City of Houston Administered Disaster Recovery Program

A. Direct Allocation

Because the City of Houston and Harris County have been awarded a direct allocation from the State, the GLO directed each to develop a local action plan. The City of Houston or the GLO will manage this direct allocation. Houston has followed GLO's guidance in submitting a local action plan, which is incorporated into various sections of the GLO's Action Plan. The local information in the City's action plan includes local needs assessment, connection to unmet needs, local programs and requirements, local consultation, and expenditure timelines.

B. Connection to Unmet Needs

The entire City of Houston is located in an area HUD identified as "most impacted and distressed". Therefore, 100 percent of funds spent in Houston will address the unmet needs of the most impacted and distressed areas in Texas. The GLO's assessment and the City's local assessment of unmet needs are the basis for the development and prioritization of recovery activities in Houston. The City has consulted with affected citizens, stakeholders, and the HHA to assess needs. As additional data becomes available and as additional community and stakeholder engagements take place, the unmet needs and activities to address them through CDBG-DR funds may be updated.

Through these funds, Houston intends to address unmet housing needs with approximately 89 percent of funds addressing unmet needs directly related to housing. Using available data and input from stakeholders and residents, the City will run the following housing programs: Homeowner Assistance Program, Single Family Development Program, Multifamily Rental Program, Small Rental Program, Homebuyer Assistance Program, and Buyout Program. The programs will address the long-term recovery of housing in Houston as efficiently as possible.

Approximately ten percent of these funds are allocated to assist homeowners through the repair, rehabilitation, and reconstruction of their homes. Approximately half of the funds will also be used to repair, rehabilitate, reconstruct, or develop new rental homes, both multifamily and single family. The remaining housing funds, available to assist both renters and homeowners, will be used to build new, affordable single family homes, assist homebuyers, will be used to build new, affordable single family homes, assist homebuyers in purchasing homes, and removing residents from homes in areas that are likely to flood again.

Houston's CDBG-DR funds will primarily address unmet housing needs. However, the City recognizes that a comprehensive and effective long-term recovery program involves a broader approach. Houston's housing programs will be complemented with public service activities to help stabilize families or prepare families for permanent housing solutions. Public service activities may include, but are not limited to, homeless prevention and services, housing counseling, legal counseling, job training, mental health, and general health services. The City has also developed an Economic Revitalization Program to create and retain jobs in the community, helping households stabilize through employment or by increasing their income.

The City has allocated $21.7 million for planning activities to support and promote a comprehensive long-term recovery effort that will tie into the regional planning efforts, as appropriate. The City will allocate $15 million of program funds for administrative costs, as allowed by the GLO. These costs will include compliance monitoring and other administrative activities to support the programs. At least 70 percent of all program funds will benefit LMI persons.

The City has included preparedness and mitigation measures into this analysis to ensure that Houstonians are safer and more resilient than they were before Hurricane Harvey and can recover faster when future disasters occur. The City will strive to incorporate preparedness and mitigation measures into its activities. These efforts will be detailed in program guidelines as they are developed. In addition, the City will use these funds and design its programs with the goal of increasing affordability and equity within Houston.

A summary of Houston's unmet need is identified in the table below. This information is both a subset of and additional information for the GLO's Summary of Total Unmet Need.

Table 58: Summary of Total Unmet Need (Updated APA 18)

Category	Losses/Gap	CDBG-DR Investments*	Other Known Investments	Remaining Unmet Need
Housing	$5,741,049,341	($1,049,714,234.52)	($2,787,448,572)	$1,903,886,534
Owner-Occupied Housing	$1,673,453,681	($545,041,697.52)		$1,122,566,869
National Flood Insurance Program	$2,956,800,000		($2,743,000,000)	$213,800,000
Renter-Occupied Housing	$1,061,408,358	($370,855,752)		$690,552,606
FEMA PA – HHA	$49,387,302		($44,448,572)	$4,938,730
Houston Single Family Development and Homebuyer Assistance Programs		($78,016,785)		($78,016,785)
Houston Buyout Program				
Houston Public Services		($55,800,000)		($55,800,000)
Infrastructure	$1,293,794,266	($84,500,000)	($1,183,964,839)	$25,329,427
FEMA PA	$590,794,266		($531,714,839)	$59,079,427
HMGP Projects	$703,000,000		($527,250,000)	$175,750,000
Insurance Proceeds and Office of the Governor's Grant			($125,000,000)	($125,000,000)
Disaster Recovery Reallocation Program		($84,500,000)		($84,500,000)
Economic	$1,401,319,818	($20,509,342.82)	($271,205,500)	$1,108,310,543
SBA Business/EIDL Loans	$1,401,319,818		($271,205,500)	$1,130,114,318
Houston Economic Revitalization Program		($20,509,342.82)		($21,803,775)
Grand Total	$8,436,163,425	($1,154,723,577.34)	($4,242,618,911)	$3,013,829,996

* CDBG-DR investments include activity delivery costs.

** CDBG-DR Owner-Occupied Housing Investments includes the State administered City of Houston Homeowner Assistance Program amount.

C. Houston Program Budget

Table 59: Total Allocation Budget – City of Houston (Updated APA 18)

Program		HUD Most Impacted Areas	State Most Impacted Areas	LMI Amount	Total	% of Total City of Houston Allocation	% of Total City of Houston Allocation	Total
City of Houston Housing	Homeowner Assistance Program	$ 68,060,675.08	$ -	$ 63,769,505.82	$68,060,675.08	10.44%	88.57%	$577,168,704.95
	Single Family Development Program	$ 3,589,439.37	$ -	$ 3,589,439.37	$3,589,439.37	0.55%		
	Multifamily Rental Program	$ 370,855,752.00	$ -	$ 370,855,752.00	$370,855,752.00	56.91%		
	Small Rental Program	$ 11,355,268.88	$ -	$ 11,355,268.88	$11,355,268.88	1.74%		
	Homebuyer Assistance Program	$ 36,046,498.95	$ -	$ 23,452,314.16	$36,046,498.95	5.53%		
	Buyout Program	$ 87,261,070.67	$ -	$ 87,261,070.67	$87,261,070.67	13.39%		
City of Houston Public Services and Economic Revitalization	Public Services	$ 17,175,483.19	$ -	$ 17,175,483.19	$17,175,483.19	2.64%	5.78%	$37,684,826.01
	Economic Revitalization Program	$ 20,509,342.82	$ -	$ 20,509,342.82	$20,509,342.82	3.15%		
City of Houston Planning	Houston Planning	$ 21,780,921.41	$ -	N/A	$21,780,921.41	3.34%	5.64%	$36,780,921.41
City of Houston Administration	Houston Administration	$ 15,000,000.00	$ -	N/A	$15,000,000.00	2.30%		
City of Houston Allocation Subtotal (before admin)		$636,634,452.37	$ -	$597,968,176.91	$636,634,452.37			
City of Houston Allocation Subtotal (after admin)		$651,634,452.37	$ -	$597,968,176.91	$651,634,452.37			

*This illustrates an estimated LMI amount and may change as applications are accepted.

D. Use of Funds

Program Guidelines: Houston's Housing and Community Development Department (HCDD) will develop program guidelines that provide details on eligibility requirements, reporting requirements, and other program information. All program guidelines will be approved by the GLO and posted for public comment before use. These programs will help accomplish actions set forth in the City's Analysis of Impediments by preserving and expanding housing and economic opportunities in Houston. Program guidelines will be developed in ways that will address fair housing impediments and promote a recovery that is equitable. It is intended that programs will utilize the program income restrictions as listed in 83 FR 5844 for its programs, as applicable. Also, under this Federal Register, HUD has waived certain program income requirements. No applicant can receive more assistance than the cap listed for the program in the guidelines, and no applicant can receive assistance in excess of the total amount allocated for the total program.

Affirmative Marketing Outreach Plan: HCDD is committed to AFFH through established affirmative marketing policies. Affirmative marketing efforts will include an affirmative marketing plan, based on HUD regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners and renters from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", and gender groups. The outreach plan will give detailed information about how the City plans for effective outreach to all groups of homeowners and renters mentioned above, as well as how the application and enrollment process for programs will be suitable for persons with limited English proficiency, persons with disabilities, and those with special needs.

AFFH Review: All proposed housing projects will undergo AFFH review. Such review will include assessments of a proposed project area's (1) demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) 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.

Cost Effectiveness: The City will look at the cost-effectiveness of each program for an eligible applicant's property and determine what options are available to applicants including rehabilitation with elevation compared to other options such as reconstruction.

Leveraging: The city of Houston intends to leverage CDBG-DR funds with funding provided by other federal, state, local, and non-profit sources to utilize the limited CDBG-DR funds to the fullest possible extent to generate a more effective and comprehensive recovery. As applicable, leveraging requirements may be added to program guidelines, applications, or NOFA/RFPs.

1. Homeowner Assistance Program (HoAP)

HCDD will provide rehabilitation, reconstruction, and reimbursement.

Rehabilitation and Reconstruction: The City will manage and complete the construction process for the rehabilitation (including elevation) or reconstruction of damaged homes on

behalf of homeowners. The City will contract with a firm(s) to provide design and construction services to manage and perform the rehabilitation or reconstruction of damaged properties. The estimated budget for this option, including project delivery, is $55,757,355.

As a part of HoAP, the City may provide Temporary Relocation Assistance (TRA). The TRA funds are to assist in easing the temporary displacement burden experienced by homeowners as a result of construction. TRA funding is included in the budget as an eligible activity

Reimbursement: Homeowners who have completed partial or full repairs on their home before applying to the program may be eligible for reimbursement of eligible expenses incurred, prior to application to the program, for work performed to minimum program standards, following an environmental clearance. Xactimate or a similar industry standard tool will be used to ensure cost reasonableness and the work will be verified through an on-site inspection by program staff. The estimated budget for this option, including project delivery, is $13,431,156.

a. Allocation Amount: $68,060,675.08
b. Maximum Assistance: The following outlines the maximum assistance for each option in HoAP. Applicants can combine some options with other options in HoAP and may also be eligible for assistance in other programs. No beneficiary can receive more than maximum for each program or option they participate in.
    i. Rehabilitation and Reconstruction Option: For rehabilitation, the local composite builder bid amount cannot be greater than $80,000 per unit for rehabilitation. This exceeds GLO's amount because it is anticipated that Houston will have a higher proportion of homeowners with larger homes with higher median home values, that have remaining unmet need and also have a need for repair and not reconstruction, compared to other impacted areas in the state. The amount of reconstruction and repair with elevation costs is the local composite builder bid amount based on procured builders and the builder's house plans based on household size and not greater than $200,000. Additional allocations may be allowed for improvements, environmental factors, neighborhood requirements, resiliency measures, and accessibility needs, at the discretion of the City based on factors outlined in the program guidelines. The maximum amount of assistance per household for base rehabilitation is $80,000, and the maximum amount for reconstruction is $200,000. These maximums do not include additional allocations such as elevation (for rehabilitation only), environmental factors, neighborhood requirements, resiliency measures, household makeup and accessibility needs, all of which are at the discretion of the City based on factors outlined in the guidelines.
        1. Temporary Relocation Assistance: This assistance may be available to applicants who are determined eligible to participate in the Rehabilitation and Reconstruction Option. HoAP Temporary Relocation Assistance (TRA) will assist eligible homeowners who are displaced during the rehabilitation or reconstruction of their Harvey-damaged home.
    ii. Reimbursement Option: Maximum amount of reimbursement funds for a household will not exceed $80,000. Additional criteria for maximum amount of assistance to eligible households based on income is included in the guidelines. This maximum does not include additional allocations such as elevation (for

rehabilitation only), environmental factors, resiliency measures, and accessibility needs, all of which are at the discretion of the City based on factors outlined in the guidelines.

c. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), 24 CFR 570.201(g) including but are not limited to:
   i. Single family owner-occupied rehabilitation and reconstruction
   ii. Hazard mitigation
   iii. Relocation assistance
   iv. Demolition only
   v. Other activities associated with the recovery of impacted single family housing stock
   vi. Payment of non-federal share

   A waiver eligible under 83 FR 5844 permits housing incentives and other requirements for one-for-one replacement housing, relocation, and real property acquisition requirements. A modification to the limitation on emergency grant payments for interim mortgage assistance will also be used as stated in the same Federal Register.

d. Ineligible Activities:
   i. Forced mortgage payoff
   ii. Incentive payments to households that move to disaster-impacted floodplains
   iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives
   iv. Rehabilitation/reconstruction of homes located in the floodway
   v. Rehabilitation/reconstruction of a home where:
      1. the combined household income is greater than 120 percent AMI or the national median, and
      2. the property was located in a 100-year floodplain at the time of the disaster, and
      3. the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.
   vi. Assistance for the repair, replacement, or restoration of a property to a person who has failed to meet Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a), which states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property.

e. Eligibility Criteria for Assistance:

Property

i. Not located in a floodway
ii. Owner-occupied at the time of the storm
iii. Served as homeowner's primary residence
iv. Sustained damage from Hurricane Harvey
v. Environmentally cleared
vi. Costs for rehabilitation, reconstruction, and new construction are reasonable and consistent with market costs at the time and place of construction;

Homeowner

i. All household members 18 and above must be current on payments for child support or under an approved payment plan.
ii. Homeowner applicants must furnish evidence that property taxes are current, under an approved payment plan, or that they have an exemption under current laws.
iii. Homeowner applicants must agree to a limited subrogation of any future awards related to Hurricane Harvey, to ensure duplication of benefits compliance.
iv. Assistance will be provided in the form of a grant, a zero-interest unsecured forgivable loan or a zero-interest secured forgivable loan. Homeowner applicants are required to maintain principal residency in the assisted property throughout the length of the forgivable loan compliance period. Cash-out refinancing, home equity loans, or any loans utilizing the assisted property as collateral must be approved during the compliance period, and considerations for this are in the program guidelines. A violation of this policy will activate the loan repayment terms.
v. Homeowner applicants must agree to the forgivable loan compliance period and lien requirements, as applicable. The award type and compliance periods for homes will be based on the amount of assistance provided (not including the additional allocations allowed for improvements):

<u>For Rehabilitation or Reconstruction</u>

a. No compliance period for award assistance of $20,000* or less.
b. 3-year unsecured compliance period with a restrictive covenant, in lieu of a lien, for award assistance over $20,000.

The restricted covenant on the property will be removed upon completion of the terms and conditions of all documents related to the program and completion of the compliance period. Should the homeowner sell or otherwise convey their ownership interest in the property during the compliance period, the remaining prorated amount of assistance will become immediately due and payable.

For homeowners utilizing both HoAP reimbursement and rehabilitation assistance, the compliance period will be the same as that for Rehabilitation or

Reconstruction, and the length of the compliance period will be determined by the total amount of assistance* provided to the homeowner.

*Assistance to determine compliance period does not include additional site-specific allocations.

For Reimbursement Only

a. Grant award for assistance $20,000* or less.
b. 1-year unsecured compliance period and no lien for $20,001 to $80,000* of assistance.

*Assistance to determine compliance period does not include additional site-specific allocations.

vi. Homeowner applicants must maintain required insurance for the assisted property during the applicable compliance period.
vii. Where disaster assistance triggers the flood insurance purchase requirement, assisted homeowners will notify any transferee of the requirement to obtain and maintain flood insurance, in writing, and to maintain such written notification in the documents evidencing the transfer of the property, and that the transferring owner may be liable, if he or she fails to do so.
viii. Additional eligibility criteria for each option is included in the guidelines. The homeowner may be eligible for multiple options, and in some circumstances, a homeowner may combine options. Exclusions in the combination of options will ensure that benefits do not overlap.

f. Selection Criteria: The following criteria will serve as the basis for HCDD's phase-wise approach to prioritizing and serving low-and-moderate income applicants through the HoAP.

i. Elderly (62 years or older) or disabled households at or below 80 percent AMI
ii. Households at or below 80 percent AMI with children
iii. Households at or below 50 percent AMI
iv. Households at or below 80 percent AMI

The remainder of the funding will be provided on a first-come, first-served basis. Individuals who are eligible for and elect to participate in Reimbursement Only will be served through a pathway outside of the application phases above.

g. Award Methodology: The City will assist homeowners in identifying the best option to meet their needs based on their eligibility for each option, the condition of their home, and where they are in the recovery process. After the City has made its eligibility determination for each option for each applicant, a case manager will work with the applicant to explain the options they can choose from, if eligible for multiple options.

h. National Objectives: LMI benefit; Urgent need.

i. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is August 2025.

2. Single Family Development Program

The devastation to the City of Houston's housing stock resulting from Hurricane Harvey included an unprecedented number of flooded homes. Many of these homes were destroyed or remain uninhabitable. This has forced many residents to relocate either temporarily or permanently. Even before this disaster, many communities had vacant lots in need of infill development. New construction of single family homes will help restore neighborhoods impacted by the storm and improve neighborhoods in need of new and infill development.

The Single Family Development Program will provide new affordable single family homes for LMI homebuyers. HCDD will issue NOFAs to provide grants and select developers. The City may use the funds to purchase land for new construction and may designate land to developers for site control and development as part of a NOFA. At least 51% of households will be LMI.

HCDD will enforce recapture provisions through a lien should a homeowner convey their ownership interest in the property during the compliance period, except in the event of a homeowner death where a low-income heir may assume the remaining lien and compliance period.

The compliance and lien period for homes purchased will be 5 years.

The assistance is provided in the form of a zero-interest forgivable loan, secured by a lien. Forgiveness of the loan provided will be prorated over the course of the lien period. The lien on the property will be removed upon completion with the terms and conditions of all documents related to the program and completion of the lien period. Should the Homeowner sell or otherwise convey their ownership interest in the property during the lien period the remaining prorated amount of assistance will be recaptured and become immediately due and payable.

This program will give opportunity to residents to move out of areas that are prone to repetitive flooding. It will also give homeowners that need substantial repairs or reconstruction the immediate opportunity to move to a new home offered for sale through this program. This program will work in conjunction with other recovery programs to provide housing options for those directly impacted by Hurricane Harvey and those indirectly impacted due to the resulting shortage of available housing.

a. Allocation Amount: $3,589,439.37

b. Maximum Award: Up to $40,000,000 per development.

c. Eligible Activity: Acquisition; Infrastructure to support new home development; New

housing construction is eligible based on information provided in 83 FR 5844 permitting new housing construction and waiving the requirements of 42 U.S.C. 5305(a) and 24 CFR570.207(b)(3) ; HCDA Section 105 (a)(1), 105(a)(2), 105(a)(4), 105(a)(7-8), 105(a)(11), and 105(a)(14-15), which may include acquisition, new construction, demolition, public services, relocation, and assistance to nonprofit organizations.

a. Ineligible Activity: Properties to be developed cannot be in a floodway or Special Flood Hazard Area.

b. Eligible Applicants:
   i. For-profit developers/borrowers
   ii. Not-for-profit developers/borrowers

c. National Objective: LMI benefit

d. Selection Criteria:

   Developer Applicant:
   Projects will be selected through an application or NOFA/RFP process. The application or NOFA/RFP will clearly establish the process and acceptance period, threshold criteria (including applicable building standards), selection criteria, and the award process. Properties purchased by the City to be designated for development will serve as an option for development. The City of Houston may acquire properties or land for new development and designate land to developers for site control and development. Developers may provide properties and land proposed for their development.

   Beneficiaries
   The beneficiaries of this Program will be LMI households. Applicants will be reviewed on a first come, first serve basis. Additional criteria will be listed in the guidelines.

e. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The program was closed in August of 2023.

3. Multifamily Rental Program

This program will address both direct and indirect impacts of Hurricane Harvey on Houston's affordable rental housing stock. The shortage of affordable rental housing units available to meet the needs of renters in Houston was exacerbated by Hurricane Harvey. The development of new multifamily rental housing, renovation and preservation of existing affordable rental housing, the acquisition and/or rehabilitation of flood-damaged multifamily rental housing, and strategic land acquisition for multifamily development aims to address this shortage and meet the needs of disaster impacted rental households, including those in public housing. This program will also provide housing designed to meet the needs of special populations.

a. Allocation Amount: $370,855,752.00

b. Maximum Award: $40,000,000 per development

c. Eligible Applicants: Acting individually or as participants in a LP or LLC:
    i. For-profit developers/borrowers
    ii. Public housing authorities and housing finance agencies– HCHA, HHA, and HHFC
    iii. Not-for-profit developers/borrowers
    iv. Units of general local government

d. Eligible Activity: Rehabilitation, Reconstruction, New Construction, and Acquisition. HCDA Section 105 (a)(1), 105(a)(3-4), 105(a)(7-8), 105(a)(11), and 105(a)(14-15). A waiver eligible under 83 FR 5844 permits new housing construction.

e. Eligibility Criteria:
    i. Project must meet CDBG-DR eligibility requirements
    ii. Development must be located within the city limits of Houston, except in certain cases where the City and County partner on projects that provide housing
    iii. At a minimum, 51 percent of the units rehabilitated or developed will be reserved under a lien period for LMI households earning 80 percent or less of the AMFI at affordable rents. On a case by case basis as permitted by the City and GLO, projects may be permitted to reserve a number of units for LMI households earning 80 percent or less of the AMFI at affordable rents equal to the percentage of the total eligible costs that may be paid by CDBG-DR funds (aka a pro rata share of the units). For rehabilitation, the lien period will be a minimum of 15 years; and for reconstruction or new construction, the lien period will be a minimum of 20 years.
    iv. Lien periods will be established and affordable rents with the Low-Income Housing Credit rent limits, 26 U.S. Code § 42 (g)(2)(a), and other existing Land Use Restriction Agreement (LURA) restrictions, as applicable. Housing Tax Credit (HTC) rent limits will be used to identify rents for target AMFI levels to align with the Local Needs Assessment.
    v. Any substantial rehabilitation, as defined by 24 CFR 5.100, or new construction of a building with more than four rental units will include installation of broadband infrastructure, as required.
    vi. Projects with eight (8) or more units must ensure construction costs are reasonable and consistent with market costs at the time and place of construction;
    vii. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
    viii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance in a flood disaster

area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

f. Selection Criteria: The selection criteria will likely include, but is not limited to, the following:
   i. Housing types
   ii. Organizational experience
   iii. Project location information
   iv. Neighborhood, development, and site amenities
   v. Financial analysis

   Applications or proposals providing housing to certain populations, including but not limited to permanent supportive housing, Section 811, previously homeless persons, or extremely low-income households, will be prioritized.

g. National Objective: LMI benefit

h. Property Types: Multifamily rental housing of eight or more rental units under common ownership.

i. Project Selection: Projects will be selected through an application or NOFA/RFP process. The application or NOFA/RFP will clearly establish the process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Selected projects must be completed within 18 months of the effective date of the contract, unless otherwise extended by Houston. Additional project selection criteria and process information will be established in the program guidelines. Subrecipient may be used to carry out this program. To address the unmet public housing needs, there will be an application process for the Houston Housing Authority. This process is addressed in the multifamily guidelines with further information about the subrecipient agreement.

j. Timeframe: The proposed program start date is immediately after HUD’s approval of this action plan amendment. The proposed end date is February 2026.

4. Small Rental Program

The Small Rental Program aims to rebuild the affordable rental housing stock by financing the new construction and reconstruction of small rental properties (2 – 7 units) and to create new housing stock, through infill development of new small rental properties, to meet the

increased demand for this type of rental housing in Houston. This program provides financial assistance, through forgivable loans, to non-profit entities designed to develop local communities and increase affordable housing stock and developers who serve a low and moderate-income market. This program will assist in expanding the affordable rental housing options, while also stimulating economic growth by assisting landlords and creating jobs in the housing rehabilitation and construction sectors.

This program will assist in expanding the affordable rental housing options, while also stimulating economic growth by assisting developers and creating jobs in the construction sector. The program will also provide an opportunity to build the financial and development capacity of small and medium sized non-profit housing developers. Houston area non-profits were strained meeting the demands of residents after the storm. This program will provide financial assistance to construct affordable homes whereby providing non-profits needed development experience to help meet the demands of future disasters.

Program may include assistance to property owners for the following that will meet eligible CDBG activities:

1. New construction and reconstruction of small rental properties
2. Housing for special populations
3. Resilience measures

Awards for property owners will be based on multiple factors which may include the number of units, size of property, and overall construction need, as well as the benefits received from insurance and other sources. Prioritization criteria may include the prioritization of projects based on length of lien periods, green building and/or energy star rated units, visitability, American Disabilities Act/Section 504, mitigation measures, and others. The program guidelines will detail award factors, selection criteria, award calculation/determination methods, construction standards, quality assurance / quality control functions, appeals and grievance processes, LMI occupancy requirements, land use restrictions, program compliance, and monitoring, and other program components.

a. Allocation Amount: $11,355,268.88

b. Maximum Award: $3,500,000 per development

c. Eligible Applicants: Property owners acting individually or as participants in LP or LLC:
    i. For-profit developers/ borrowers
    ii. Public housing authorities
    iii. Units of local governments
    iv. Not-for-profit developers/ borrowers

d. Eligible Activity: Rehabilitation, Reconstruction, New Construction, and Acquisition HCDA Section 105 (a)(1), 105(a)(3-4), 105(a)(7-8), 105(a)(11), and 105(a)(14-15). A waiver eligible under 83 FR 5844 permits new housing construction.

e. Eligibility Criteria:

Property owner applicants must:

i. Provide proof that:
    1. Property taxes are current,
    2. They have an approved payment plan, or
    3. There is an approved property tax exemption in place
ii. Agree to a limited subrogation of any future awards related to Hurricane Harvey according to duplication of benefits requirements
iii. Agree to lien period and lien requirements

Property must:

i. Not be in a floodway
ii. Have an environmental clearance

Development:

i. Must meet CDBG-DR eligibility requirements
ii. Must be located within the city limits of Houston, except in certain cases where the City and County partner on projects that provide housing
iii. At a minimum, 51 percent of the contiguous units rehabilitated or developed may be reserved for a lien period for LMI households earning 80 percent or less of the AMFI at affordable rents.
iv. Affordability Restrictions
    1. Developments will have a minimum affordability period and loan term of 20 years.
v. Any substantial rehabilitation, as defined by 24 CFR 5.100, or new construction of a building with more than four rental units will include installation of broadband infrastructure, as required. Developments may include more than one property, such as with a scattered site rental development.
vi. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
vii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
viii. Applicable elevation requirements will apply to development and rehabilitation.

f. National Objective: LMI benefit

g. Property Types: Small rental properties of two to seven rental units under common ownership.

h. Project Selection: Projects will be selected through an application or NOFA/RFP process. The application or NOFA/RFP will clearly establish the process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Selected projects must be completed within 18 months of the effective date of the contract, unless otherwise extended by GLO. Project selection criteria and process information will be established in the program guidelines. The selection criteria will likely include, but is not limited to, the following:
   i. Housing types
   ii. Organizational experience
   iii. Project location information
   iv. Financial analysis

   Applications or proposals providing housing to certain populations, including but not limited to permanent supportive housing, Section 811, previously homeless persons, or extremely low-income households, will be prioritized.

i. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is February 2026.

5. Homebuyer Assistance Program

The Homebuyer Assistance Program will provide funds for down payment, closing cost, principal buydown, and other direct financial assistance to homebuyers to finance the purchase of a home. This program will help improve homeownership affordability for residents. The Homebuyer Assistance Program will prioritize households that were impacted by Hurricane Harvey to facilitate the movement of LMI households into new homes after their homes were damaged by Hurricane Harvey. The program consists of two rounds. The first round closed in March of 2025, the second round will begin with HUD approval of action plan amendment 18.

The Homebuyer Assistance Program may provide down payment and closing cost assistance to eligible households earning up to 120 percent of AMI. Direct homeownership assistance under 570.201(n) allows the City to pay up to 100 percent of the down payment amount required by the lender. The City may also utilize other forms of direct homebuyer assistance such as subsidizing interest rates and mortgage principal amounts, including making grants to reduce the effective interest rate on the amount needed by the eligible household to achieve an affordable mortgage payment level. Primarily, the City will provide direct financial assistance in the form of forgivable loans. The lien period for homes purchased will have a minimum of five (5) years. The lien on the property will be removed upon completion with the terms and

conditions of all documents related to the program and completion of the lien period. Should the Homeowner sell or otherwise convey their ownership interest in the property during the lien period the remaining prorated amount of assistance will become immediately due and payable.

a. Allocation Amount: $36,046,498.95
    i. Round One: $16,246,498.95
    ii. Round Two: $19,800,000.00

b. Maximum Award:
    i. Round One: $30,000 per unit
    ii. Round Two: $125,000 per unit

c. Eligible Activity: This activity is eligible for CDBG-DR funds as listed in 24 CFR 570.201(n) and HCDA section 105(a)(24); A waiver eligible under 83 FR 5844 permits Homeownership assistance for households earning up to 120 percent AMI and down payment assistance for up to 100 percent of the down payment.

d. Eligible Applicants: The criteria for establishing eligibility of applicants for assistance through this program are as follows. The applicant must:
    i. Meet income eligibility requirements (up to 120 percent of AMI)
    ii. Agree to lien period and/or lien requirements

e. Applicant Selection: Eligible applicants will be households earning 120 percent AMI or below. Applicants that have been impacted by Hurricane Harvey will receive priority and the remainder will be prioritized first come, first served.

f. National Objective: LMI benefit; Urgent need

g. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The end date of round one was March 2025. The start date of round two was September 2022, and the proposed end date of phase two is February 2027.

6. Buyout Program

Many homes have flooded repeatedly since 2015, highlighting a need for a more permanent solution for some residents. Through this program, the City or a subrecipient will purchase residential structures at post-storm fair market value that have flooded and demolish them to create park amenities, open space, or detention areas. This voluntary program is intended to assist residents to move out of areas that have been impacted by multiple disasters or are at high risk of flooding from future disasters. This program is also intended to reduce the impact of future disasters, while encouraging targeted revitalization efforts and the creation of open space.

HCDD may work with other City Departments or a subrecipient, such as the HCFCD, to implement this program. If a subrecipient is selected, the City will work with the

subrecipient to choose buyout project locations. Buyouts under this program may be part of a larger City or County buyout strategy, in accordance with a long-term plan for the property to become future open space or detention, to avoid removing a viable property from the housing market. It will include the buyout of impacted multifamily housing. Buyout property will be maintained in perpetuity as greenspace, as applicable to buyouts.

a. Allocation Amount: $87,261,070.67

b. Maximum Assistance: The program is intended to purchase residential structures at post-storm valuation; thus, the sellers will not be considered to be recipients benefiting from CDBG-DR assistance.

c. Eligible Activities: This activity is eligible for funds as listed in HCDA section 105(a)(1), 105(a)(4), 105(a)(7-9) 105(a)(24-25);24 CFR 570.201(g); and 83 FR 5844, including but not limited to:
    i. Buyouts
    ii. Acquisition
    iii. Disposition
    iv. Demolition
    v. Relocation Assistance
    vi. Public Service
    vii. Payment of Non-Federal Share

    A waiver eligible under 83 FR 5844 permits other requirements for one-for-one replacement housing, relocation, and real property acquisition requirements.

d. Ineligible Activities:
    i. Forced mortgage payoff;
    ii. Incentive payments to households that move to disaster-impacted floodplains;
    iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
    iv. Assistance for the repair, replacement, or restoration of a property to a person who has failed to meet Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a), which states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for ‘‘repair, replacement, or restoration’’ for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property.

e. Eligibility Criteria for Assistance:

    Multifamily Residential Structures

i. Rental Property
   1. Renter-occupied at the time of the storm
   2. Sustained damage from Hurricane Harvey
   3. Environmentally cleared
   4. Located in DRRA or floodplain

Rental Property Owner

i. Rental Property owners must furnish evidence that property taxes are current, they are under an approved payment plan, or that they have an exemption under current laws.

f. Program guidelines will detail applicant or project eligibility requirements, application process, compliance with URA regulations, and other information.

g. National Objective: LMI benefit

h. Timeframe: The program start date was February 11, 2019. The end date for this program is April 30, 2026.

7. Public Services

Houstonians were impacted by Hurricane Harvey in many ways. Physical property was damaged, homes were flooded, and personal possessions were lost. The lingering effects of this damage has impacted resident's physical and mental health. In addition, vulnerable populations are often less able to recover from disaster impacts, which could directly affect their job prospects and housing options.

Public services offered will provide a comprehensive approach to recovery for Houstonians. These services will support residents to find housing, remedy housing issues, or to become more resilient in future disasters, whether they be natural, economic, or personal, creating a stronger more prepared community. Services will be made accessible to individuals with wide- ranging disabilities through varying outreach strategies, partnerships with organizations serving people with disabilities, and making accommodations, as needed.

Services may include housing counseling, legal assistance, transportation services, fair housing services, health/mental health services, employment training, workforce development, and other services to address the needs of those impacted by Hurricane Harvey. Housing counseling and legal assistance services will assist in furthering fair housing by addressing housing barriers and allowing residents greater choice to move to neighborhoods with higher opportunity. Employment training and workforce development programs, including those that support housing recovery and housing construction, will address the need for job skills to support Houston's recovery. In addition, workforce development will help boost long-term recovery by supplying residents of impacted communities with the necessary skills and opportunities to increase household income. To address the needs of those impacted who have become homeless or are at risk of becoming homeless, services may include case management, and other services to assist in housing

and/or rehousing this population.

The provision of public services is also intended to assist residents in preparing and qualifying for housing programs. Remedying title or tax issues through legal services and providing housing counseling for LMI communities may prepare more residents to become eligible for programs such as HCDD's Homeowner Assistance and Homebuyer Assistance Programs.

a. Allocation Amount: $17,175,483.19

b. Maximum Award: $5,000,000 per contract

c. National Objective: LMI benefit

d. Eligible Activity: Eligible activities include the provision of public services as listed in HCDA Sec. 105(a)(8)

e. Eligible Applicants: Subrecipients will be determined through an application or NOFA process and will include non-profit agencies. Houstonians will receive assistance directly through the selected subrecipients. These subrecipients will ensure services are open to all residents, including those with limited English proficiency or other special needs populations.

f. Selection Criteria: Projects and subrecipients will be selected through an application or NOFA process. The application or NOFA will clearly establish the process and acceptance period, threshold criteria, selection criteria, and the award process. Selection criteria and any prioritization of impacted households will be established in the Public Services guidelines, NOFA, or application. Selection criteria will likely include: the activity and need, cost reasonableness and effectiveness, activity management and implementation, and experience/past performance.

g. Through the selected subrecipients, public services will be provided to primarily LMI persons or persons in LMI areas. This may include those that need public services to assist them in accessing housing programs or becoming eligible for housing programs. Receiving public services offered is not contingent upon also receiving services through the housing programs offered.

h. Timeframe: The proposed start date or public services is immediately after HUD's approval of this action plan amendment. The proposed end date is August 2025.

8. Economic Revitalization Program

The Harvey Economic Development Program (HEDP) addresses the impact of Hurricane Harvey and the City's unmet housing needs both directly and indirectly by stimulating small business recovery and growth as well as the creation of jobs that will improve the economic viability of the areas most impacted by the storm. This program will assist small businesses

and foster job creation in the community by providing working capital, and technical assistance to small businesses, with an emphasis on microenterprises.

The HEDP will provide small business assistance through the following program:

Small Business Grant Program (SGP) provides qualified microenterprises and small businesses (as defined by SBA) with a working capital grant for recovery and growth following the impact of Hurricane Harvey.

a. Allocation Amount: $20,509,342.82

b. Maximum Award:

   i. Small Business Grant Program: working capital grants of up to $150,000.

c. National Objective: LMI benefit
   i. Business must be a microenterprise owned by an individual whose income falls at or below 80% of the median income by family size as defined by income requirements established by HUD for the county (LMC), or
   ii. Small business that will create at least one job to be held by, or made available to, LMI persons (LMJ), or
   iii. Small business must serve an (LMA) area.

d. Eligible Activity: This activity is eligible for funds as listed in HCDA section 105(a)(17), 105(a)(19), 105(a)(22); a waiver eligible under 83 FR 5844 permits other national objective documentation and public benefit standards. Cost verification controls must be in place to assure that costs are reasonable and consistent with market costs. Any projects funding for-profit entities must be evaluated and selected in accordance with guidelines (established in Appendix A to 24 CFR part 570) developed by HUD and comply with HUD underwriting guidance.

   i. Small Business Development: CDBG-DR funds may be used to undertake small business assistance through grants and technical assistance as set forth in 24 CFR § 570.203, Special Economic Development Activities.

   ii. Microenterprise Development: CDBG-DR funds may be used to undertake microenterprise assistance through grants and technical assistance as set forth in 24 CFR Part 570.201(o).

e. Eligible Applicants: Program eligibility criteria is outlined in the HEDP Guidelines.

f. Timeframe: The proposed program start date is February 2021. The proposed end date is February 2026.

9. Planning

Funding will be used for planning activities that will benefit the most impacted and distressed areas. Vulnerable populations or neighborhoods often struggle to bounce back from disasters. Planning activities will be focused on various mitigation and resiliency efforts to protect Houstonians and help them recover from disasters.

Planning activities will include community engagement to inform the City's recovery plan development and to support various city-wide housing activities. The City may also use these funds to study specific topics related to mitigation or resilience or plan for specific projects that could address impacts of Hurricane Harvey or the recurring nature of disasters in Houston. The types of studies or plans could include flood control, drainage improvement, resilient housing solutions, fair housing, homelessness, surge protection, economic development, infrastructure improvements, or other efforts to further recovery from Hurricane Harvey, mitigate future damages, and establish plans for comprehensive recovery efforts. The City may work with other local jurisdictions on various types of planning projects.

Planning activities will strive to promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks.

The GLO has limited Houston's planning costs to $23,100,000. The City of Houston will administer these funds as a subrecipient of the GLO. Further amendments may convert a portion of these planning funds to other eligible expenses to execute specific projects, which may have been studied or developed through the planning process.

a. Allocation Amount: $21,780,921.41

b. Eligible Activities: The eligible activity is planning, urban environmental design, and policy-planning-management-capacity building activities as listed in 24 CFR 570.205.

c. Selection Criteria: Projects and/or subrecipients will be selected through an application, NOFA/RFP, or other competitive process. The application or NOFA/RFP will clearly establish the process and acceptance period, threshold criteria, selection criteria, and the award process. Selection criteria will be established in the application, NOFA/RFP or a competitive process and will likely include planning activity/project description, organizational experience, cost reasonableness and effectiveness, and management of activity/project. Priorities for activities include those that deepen the understanding of housing issues in Houston, evaluate impact of funding, and support the development of required HUD documents.

d. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is August 2025.

10. Administration

The GLO will retain the full 5 percent allocated for administrative costs for purposes of oversight, management, and reporting. The only exception is for an allowance for up to $15,000,000 of the City's program amounts for administrative costs. Houston plans to budget for administrative costs allowed by the GLO for program administrative costs as listed in 24 CFR 570.206.

a. Allocation Amount: $15,000,000

b. Caps: The GLO will allow the City to spend up to 10 percent of program amounts for costs directly related to implementation of housing activities and 6 percent for non-housing and infrastructure activities. The GLO has capped engineering and design activities at 15 percent of the total project award, unless special services are necessary, subject to GLO approval. These activity delivery costs will be defined in the City's applications to the GLO for individual programs and projects, as needed.

c. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date February 2026.

6.1. Citizen Participation – State Action Plan

The primary goal of this plan is to provide Texans with definitive opportunities to involve themselves in the recovery process as it pertains to CDBG-DR funds. The Texas GLO is acutely aware of the hardships many are faced with in the wake of Hurricane Harvey and strives to provide an ease of access to vulnerable populations struggling to recover.

The GLO's Community Development and Revitalization Division (CDR) citizen participation plan for the Hurricane Harvey allocation was developed based on the requirements outlined in HUD Federal Register Notice, Vol. 83, No. 28, Friday, February 9, 2018 and Vol. 83, No. 157, Tuesday, August 14, 2018.

According to the Notice, "To permit a more streamlined process, and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds."

The most current version of the Texas GLO's Citizen Participation Plan for Hurricane Harvey will be placed on the website at recovery.texas.gov.

The State of Texas Action Plan for Hurricane Harvey, and any following amendments outline the major damages from Hurricane Harvey and unmet needs within the recovery process. The Action Plan outlines the eligible use of CDBG-DR funds, and specific programs that will be allowable by the GLO.

A. Publication

Before the GLO adopts the Action Plan for this grant or any substantial amendment to this grant, the GLO will publish the proposed plan or amendment on https://recovery.texas.gov/action-plans/index.html, the GLO's recovery websites and will cross-reference with additional agency websites:

The GLO and/or subrecipients will notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, newsletters, contacts with neighborhood organizations, and/or through social media.

The GLO will ensure that all citizens have equal access to information about the programs, including persons with disabilities and limited English proficiency (LEP). The GLO will ensure that program information is available in the appropriate languages for the geographic area served by the jurisdiction. For assistance, in ensuring that this information is available to LEP populations, recipients should consult the *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination*

Affecting Limited English Proficient Persons, published on January 22, 2007, in the Federal Register (72 FR 2732).

The Action Plan in its entirety will be translated to Spanish, Vietnamese, Chinese, Urdu, and Arabic. The languages selected were selected based on the entire eligible area of the CDBG-DR funds and a natural break in the numbers of Limited English Proficiency individuals. Recognizing there may be a need for individuals to have access to the document in additional languages the GLO will be contracting with a translation service to provide personalized translations of the Action Plan upon request. Any public places that work directly in programs available to private individuals will carry signage detailing this service in applicable languages. The GLO website will include similar notations.

Subsequent to publication of the action plan or substantial amendment, the GLO will provide a reasonable opportunity of at least 30 days and have a method(s) for receiving comments. Citizens with disabilities or those who need technical assistance can contact the GLO office for assistance, either via: TDD 512-463-5330 or TX Relay Service 7-1-1.

The GLO will take comments via USPS mail, fax, email, or through the GLO's website:

Texas General Land Office
Community Development and Revitalization
P.O. Box 12873
Austin, TX 78711-2873
Fax: 512-475-5150
Email: cdr@recovery.texas.gov

In the Action Plan, the GLO will specify criteria for determining what changes in the GLO's plan constitute a substantial amendment to the plan. At a minimum, the following modifications will constitute a substantial amendment: a change in program benefit or eligibility criteria, the addition or deletion of an activity, or the allocation or reallocation of a monetary threshold specified by the GLO in the action plan.

B. Consideration of Public Comments

The GLO will consider all written comments regarding the Action Plan or any substantial amendment. A summary of the comments and the GLO's response to each located in the Appendix section will be submitted to HUD with the Action Plan or substantial amendment.

C. Citizen Complaints

The GLO will provide a timely written response to every citizen complaint. The response will be provided within fifteen (15) working days of the receipt of the complaint, when practicable.

D. Substantial Amendment

As additional information and funding becomes available through the grant administration process, amendments to this Action Plan are expected. Prior to adopting any substantial amendment to this Action Plan, the GLO will publish the proposed plan or amendment on the GLO's recovery website and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment's contents. At a minimum, the following modifications will constitute a substantial amendment:

- A change in program benefit or eligibility criteria;
- The allocation or reallocation of more than $25 million or a change constituting more than 20% of a program's budget; or
- The addition or deletion of an activity.

E. Non-substantial Amendment

The GLO will notify HUD when it makes any plan amendment that is not substantial. HUD will be notified at least five (5) business days before the amendment becomes effective. HUD will acknowledge receipt of the notification of non-substantial amendments via email within five (5) business days.

F. Community Consultation

Before Hurricane Harvey made impact on the Texas Coast, the GLO took measures to email local officials potentially in the path of disaster, reminding them of the steps that they could take to help ensure an effective recovery, if needed. Since then, the GLO has continued its efforts to elicit feedback from local officials and interested parties through meetings, conference calls and frequent trips to impacted communities. These trips have included public forums and meetings with elected officials, including local, state, and federal partners.

Since mid-November, the GLO has held weekly conference calls with local elected officials to provide updates on recovery efforts following Hurricane Harvey. Calls included time for participants to ask critical questions pertaining to the overall recovery and their community. Beginning in February the GLO transitioned to bi-monthly calls but may increase the frequency if requested by local officials.

In partnership with HUD, the GLO has been conducting "Strike Team Meetings" to allow local officials the opportunity to ask specific questions and bring potential projects to state and federal agencies in an effort to find the best coordinated recovery for individual communities. The intent is to conduct a strike team meeting with every county in the impacted region.

The GLO has participated in meetings with the Governor's Commission to Rebuild Texas, Strike Team Meetings, and other requested meetings. A cumulative list of community consultation is in Appendix 11.1.

G. Public Website

The GLO will maintain a public website that provides information accounting for how all grant funds are used and managed/administered, including: links to all Action Plans; Action Plan amendments; CDBG–DR program policies and procedures; performance reports; citizen participation requirements; and activity/program information for activities described in its Action Plan, including details of all contracts and ongoing procurement policies.

The GLO will make the following items available on recovery.texas.gov: (1) the Action Plan (including all amendments); each Quarterly Performance Report (QPR) as created using the DRGR system; (2) procurement, policies and procedures; (3) executed CDBG-DR contracts; and (4) status of services or goods currently being procured by the GLO (e.g., phase of the procurement, requirements for proposals, etc.).

In addition to the specific items listed above, the GLO will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. This includes reporting information on the GLO's recovery website, recovery.texas.gov, and additional in-depth program information on a separate site dedicated specifically to disaster recovery. The website will be updated in a timely manner to reflect the most up-to-date information about the use of these funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made on a monthly basis.

1. Harris County Website

- Harris County: http://harriscountycommunitycorner.org/

2. COG Websites

- Alamo Area Council of Governments (AACOG): www.aacog.com
- Brazos Valley Council of Governments (BVCOG): www.bvcog.org
- Capital Area Council of Governments (CAPCOG): www.capcog.org
- Coastal Bend Council of Governments (CBCOG): www.cbcog98.org
- Central Texas Council of Governments (CTCOG): www.ctcog.org
- Deep East Texas Council of Governments (DETCOG): www.detcog.org
- Golden Crescent Regional Planning Commission (GCRPC): www.gcrpc.org
- Houston-Galveston Area Council (H-GAC): www.h-gac.com
- South East Texas Regional Planning Commission (SETRPC): www.setrpc.org

H. Waivers

The Appropriations Act authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary, or use by the recipient, of these funds and guarantees, except for requirements related to fair housing, nondiscrimination, labor standards, and the environment (including requirements concerning lead-based paint), upon: (1) A request by the grantee explaining why such a waiver is required to facilitate the use of such funds or

guarantees; and (2) a finding by the Secretary that such a waiver would not be inconsistent with the overall purpose of HCDA. Regulatory waiver authority is also provided by 24 CFR 5.110, 91.600, and 570.5.

6.2. Citizen Participation – Harris County Local Action Plan

The primary goal of this plan is to provide Harris County residents with definitive opportunities to involve themselves in the recovery process as it pertains to CDBG-DR funds. Harris County is acutely aware of the hardships many are faced within the wake of Hurricane Harvey and strives to provide an ease of access to vulnerable populations struggling to recover.

On April 16, 2018, Harris County officially kicked off is community engagement activities. The county met with local advocates to discuss the need for residential buyout, other homeowner incentives, future citizen participation for recovery from Hurricane Harvey and CDBG-DR, and AFFH, especially during and after a disaster. The county's goals for community engagement is to solicit input on needs and unmet needs in the county, provide resource navigation to existing services for immediate and future needs, educate on the CDBG-DR program, and identify and to the best extent possible provide access to remedy any discriminatory practices suffered by county residents as they recover. The county will seek to engage the public, especially vulnerable populations such as low-income and persons with a disability; housing and civil rights advocates; local community leaders; non-profits; business owners; and other area stakeholders. Harris County is providing several methods of engagement:

1. Stakeholder and Focus Group meetings-small group discussions around a specific topic of recovery and unmet needs
2. Community meetings in an Open House style welcoming all the public
3. Community Survey-provided in English and Spanish
4. Community meeting in a Box-allows grassroot community engagement with local moderators leading small groups of neighbors through a series of questions regarding their household's and community's recovery and CDBG-DR.
5. The Project Recovery website offers residents of Harris County, community leaders, businesses, and other interested parties up-to-date information on disaster recovery programs and links to resources. The website address is http://harrisrecovery.org.

From May to July 2018, Harris County Community Services Department has conducted a series of community meetings along with our community partners, such as the Texas Organizing Project and BakerRipley (see a list of meetings in the Appendix). These meetings were held throughout the county and included some of the county's small cities. Meeting flyers in English, Spanish and Vietnamese were distributed via local schools, utility districts, local non-profits, social media, direct email to residents, door to door canvasing, phone calls to residents, text messaging, posting in community buildings, and news media release (radio, print and television). Meetings have averaged 55 persons, with two meetings with attendance over 100 persons. Meetings had language and sign language interpreters available. Discussions by citizens have ranged from the need for a buyout program and need for drainage improvements to individuals expressing personal needs for recovery like home repair options and need for affordable housing. At the meetings, Harris County has hosted groups like Lone Star Legal, HC Housing Resource Center, FEMA and the local county precincts to operate information booths for meeting attendees.

Harris County has conducted two meetings with advocates and subject experts. Attendees included housing providers, Fair Housing advocates, non-profits, housing authorities, universities,

environmentalist, engineers, financial providers, builders, faith-based leaders, legal service providers, buyout services providers, and organizations serving disabled populations.

A. Policies Regarding the Project Recovery Website

Harris County Community Services Department, the County's lead administrator for CDBG-DR, has developed The Project Recovery website that offers Harris County residents, community leaders, businesses, and other interested parties up-to-date information on disaster recovery programs and links to resources. The County will maintain this public website that provides information accounting for how all grant funds are used and managed/administered, including: links to Action Plans and amendments; CDBG-DR program guidelines, policies, and procedures; performance reports; citizen participation; and activity/program information for activities described in the County's section of the State of Texas Action Plan, including details of contracts and ongoing procurement policies.

The Harris County Project Recovery website address is http://harrisrecovery.org/.

This comprehensive website at a minimum will be regularly reviewed and updated on a monthly basis.

B. Partnership with Harris County Flood Control District

The HCFCD is a special-purpose district created by the Texas Legislature in 1937 after community leaders petitioned for assistance in response to devastating floods in 1929 and 1935. The HCFCD was originally given the responsibility of overseeing rivers, streams, tributaries, and flood waters in Harris County "for domestic, municipal, flood control, irrigation and other useful purposes." Additionally, the HCFCD was responsible for the reclamation and drainage of the overflow land of Harris County, the conservation of forests, and keeping navigable waters "navigable" by regulating the stormwater that flowed into them.

HCFCD has operated the Harris County Residential Buyout Program since 1985 and has acquired and removed approximately 3,000 houses located hopelessly deep in the floodplain where flood damage reduction projects, like channel improvements or storm water detention basins, are not cost-effective and/or beneficial. Once bought out, these parcels are returned to their beneficial function, aiding in the storage of floodwaters. Those homeowners who are bought out receive assistance to move to an area with reduced flood risk.

As the County is the administrator of the CDBG-DR funding and as Hurricane Harvey was a devastating flood in the County, it is a natural partnership for Harris County to work with HCFCD. Harris County, through its Community Services Department (HCCSD) and Engineering Office, meet regularly with HCFCD to develop future programs to improve drainage in the county and expand the buyout program, particularly to LMI households. An inter-local agreement will be executed between HCCSD and HCFCD regarding CDBG-DR funding and programs. The team also coordinates outreach efforts to residents regarding: 1) the buyout program and 2) future drainage improvement. Throughout May to August 2018, both groups held over 35 community

meetings educating the public regarding recovery resources, and gathering public input on unmet needs and comments on future possible projects.

C. Grievances and Appeals

Harris County is responsible for responding to complaints and appeals in a timely and professional manner. A grievance and appeals procedure will be afforded to applicants to provide a quick and efficient system for resolution of concerns or disputes that applicants may have with the procedures followed and services provided by Harris County. The appeals procedure will include both an informal and a written grievance process which may include but not be limited to informal hearings, third-party review, and director approval. Harris County will keep a record of each complaint or appeal that it receives to include all communications and their resolutions. Complaints alleging violation of fair housing laws will be directed to HUD for immediate review (see Grievance and Appeals policy). Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1–800–347–3735 or email: hotline@hudoig.gov). If an applicant disagrees with the County's decision, he or she can appeal to the Texas GLO.

When a complaint or appeal is received, a representative will respond to the complainant or appellant within fifteen (15) business days where practicable. For expediency, Harris County shall utilize telephone communication as the primary method of contact; however, email and postmarked letters will be used as necessary.

Harris County will identify staff within their program tasked with handling all applicant and participant inquiries. These staff will be responsible for: (1) determining whether or not complaints and appeals relate to the business or authority of Harris County, (2) ensuring that a response to all complaints and appeals are within the appropriate time frame (a response must be provided within 15 working days of the receipt of the complaint), and (3) ushering all complaints and appeals through to a resolution. Harris County has a Grievance and Appeals policy that addresses handling incoming complaints, including a complaint escalation process in order to ensure that complaints are handled at the earliest stage in the process. The entire appeals and or complaint process will be concluded within a 45 business day period with final written determination sent to the complainant within this timeframe.

Documentation for each complaint or appeal must be maintained. Each file must include the following:

- Contact information for the complainant;
- Initial complaint;
- Address and Harris County assigned project number (if applicable);
- Any communications to and from complainant or appellant;
- Results of the investigation, together with any notes, letters, or other investigative documentation;
- The date the complaint or appeal was closed; and
- Any other action taken.

6.3. Citizen Participation – City of Houston Local Action Plan (Amendment 1)

The primary goal of this plan is to provide Houstonians with opportunities to involve themselves in the Hurricane Harvey recovery process as it pertains to CDBG-DR funds.

A. Community Consultation

Beginning in April 2018, the City's HCDD convened a small working group of community stakeholders and organizations to discuss best practices and a path forward for community engagement to ensure that Houstonians have significant input in how the City utilizes Hurricane Harvey CDBG-DR funding. HCDD's approach throughout its engagement process is two-fold - informing the community about the fundamentals of CDBG-DR funding and gathering input at the neighborhood level to better understand unmet disaster-related needs. In consultation with community stakeholders, HCDD has adopted the following principles in reaching out to disaster-affected communities:

- Be transparent with the community about data and programs to address outstanding disaster related issues
- Inform residents about the CDBG-DR funding process including the Action Plan process, regulation requirements, eligible and ineligible activities, and interim resources available
- Seek representative input from different areas in the city
- Provide multiple avenues for residents to give feedback
- Link community input to decisions about disaster recovery funding
- Leverage meetings already scheduled with external partners, in addition to scheduling City-hosted meetings

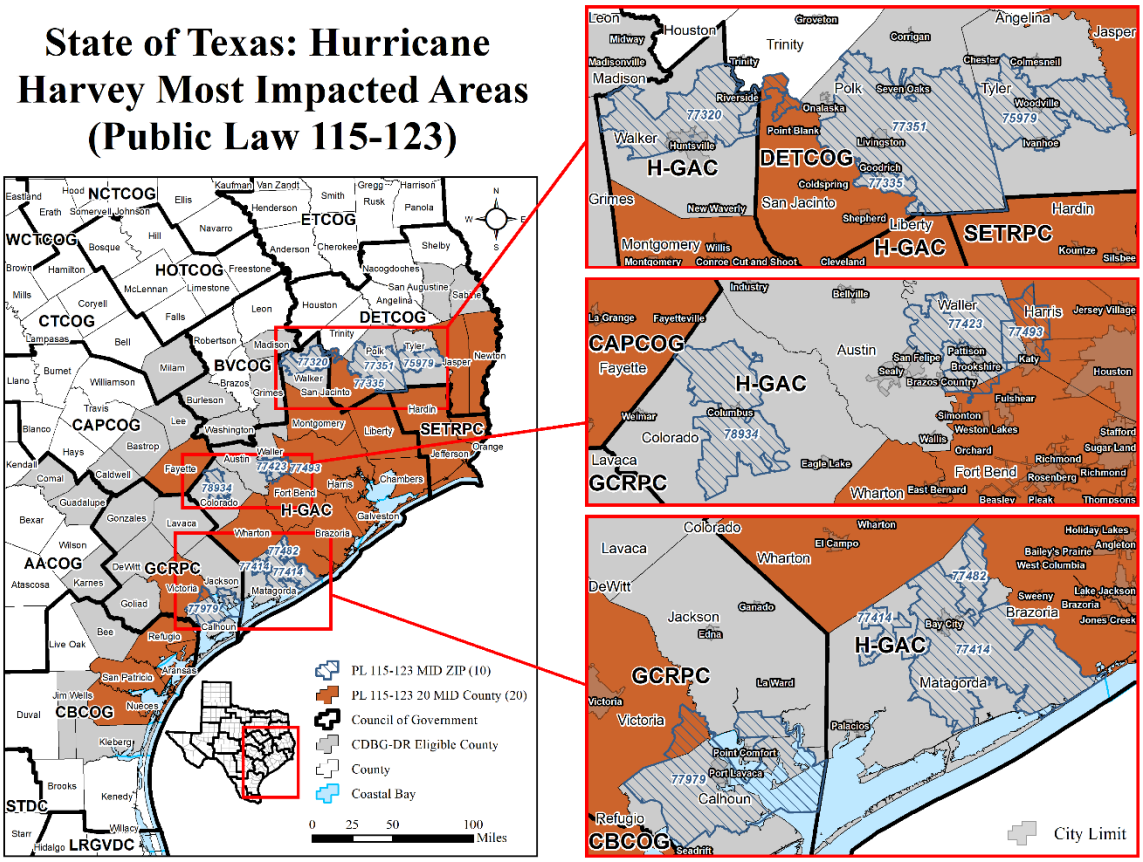
Throughout May and June 2018, HCDD worked with community groups, groups representing protected classes, Super Neighborhood Councils, civic groups, and City Council Members to host public meetings around the city to inform the City's Action Plan. Additionally, HCDD engaged community partners, such as [bc] Workshop, University of Houston - College of Architecture Community Design Resource Center, and University of Texas School of Health, to provide meeting facilitation and record-keeping assistance. The format of these meetings includes a presentation on CDBG-DR funding followed by facilitated table discussions on key disaster recovery challenges and priorities. Table discussions have focused on neighborhoods, with residents discussing their post-disaster concerns around neighborhood-specific topics. Considering the targeted audience, meetings have been conducted in English and Spanish, with interpretation services available, as needed.

In addition, HCDD convened and participated in several disaster recovery community engagement events with expert groups of developers and housing advocates. To elicit feedback on disaster recovery needs on a city-wide scale, HCDD launched a Hurricane Harvey public survey in English and in Spanish on May 14, 2018. As of June 24, 2018, HCDD received 746 responses.

B. Complaints

The response will be provided in writing, or other effective communication, within fifteen (15) working days of the receipt of the complaint, when practicable.

7.1. Appendix A: CDBG-DR Eligible and Most Impacted Counties and ZIP Codes



Aransas (MI)	Grimes	Newton (MI)	77335
Austin	Guadalupe	Nueces (MI)	77351
Bastrop	Hardin (MI)	Orange (MI)	77414
Bee	Harris (MI)	Polk	77423
Brazoria (MI)	Jackson	Refugio (MI)	77482
Burleson	Jasper (MI)	Sabine	77493
Caldwell	Jefferson (MI)	San Augustine	77979
Calhoun	Jim Wells	San Jacinto (MI)	78934
Chambers (MI)	Karnes	San Patricio (MI)	
Colorado	Kleberg	Tyler	MI = HUD Identified Most-Impacted
Comal	Lavaca	Victoria (MI)	
DeWitt	Lee	Walker	
Fayette (MI)	Liberty (MI)	Waller	
Fort Bend (MI)	Madison	Washington	
Galveston (MI)	Matagorda	Wharton (MI)	
Goliad	Milam	75979	
Gonzales	Montgomery (MI)	77320	

CDBG-DR Counties by Councils of Governments

CDBG-DR Eligible Counties	COG	CDBG-DR Eligible Counties	COG
Comal	AACOG	Calhoun	GCRPC
Guadalupe	AACOG	DeWitt	GCRPC
Karnes	AACOG	Goliad	GCRPC
Burleson	BVCOG	Gonzales	GCRPC
Grimes	BVCOG	Jackson	GCRPC
Madison	BVCOG	Lavaca	GCRPC
Washington	BVCOG	Victoria	GCRPC
Bastrop	CAPCOG	Austin	H-GAC
Caldwell	CAPCOG	Brazoria	H-GAC
Fayette	CAPCOG	Chambers	H-GAC
Lee	CAPCOG	Colorado	H-GAC
Aransas	CBCOG	Fort Bend	H-GAC
Bee	CBCOG	Galveston	H-GAC
Jim Wells	CBCOG	Harris	H-GAC
Kleberg	CBCOG	Liberty	H-GAC
Nueces	CBCOG	Matagorda	H-GAC
Refugio	CBCOG	Montgomery	H-GAC
San Patricio	CBCOG	Walker	H-GAC
Milam	CTCOG	Waller	H-GAC
Jasper	DETCOG	Wharton	H-GAC
Newton	DETCOG	Hardin	SETRPC
Polk	DETCOG	Jefferson	SETRPC
Sabine	DETCOG	Orange	SETRPC
San Augustine	DETCOG		
San Jacinto	DETCOG		
Tyler	DETCOG		

8.1. Appendix B: Certifications – State of Texas

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.

b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

c. The grantee certifies that the action plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its action plan.

d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice.

e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

g. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the of funding, or activities carried out directly by the State.

h. The grantee certifies that it is complying with each of the following criteria:

> 1. Funds will be used solely for necessary expenses related to disaster relief, long- term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2016 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq*.).

2. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

3. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.

4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

(a) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

(b) For purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

i. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.

l. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

n. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

o. The grantee certifies that it will comply with applicable laws.

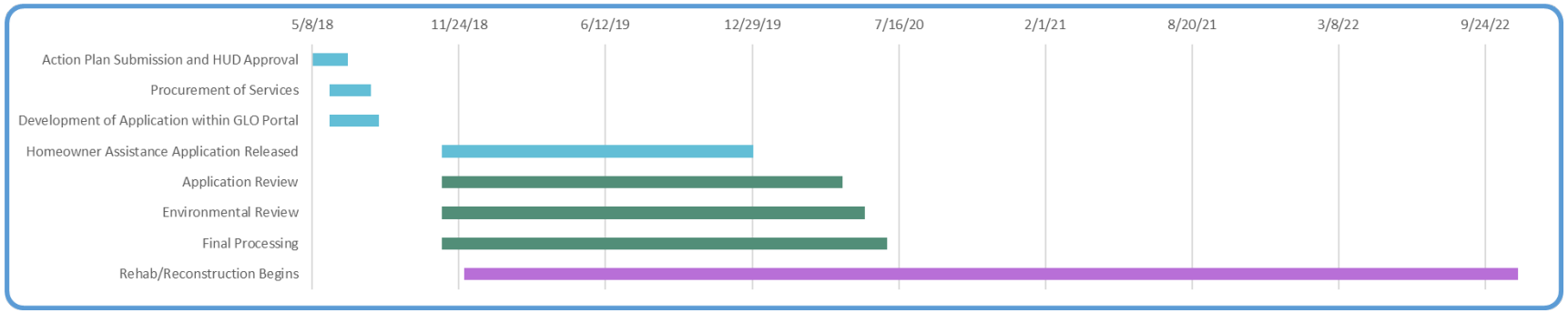
Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.

Heather Lagrone

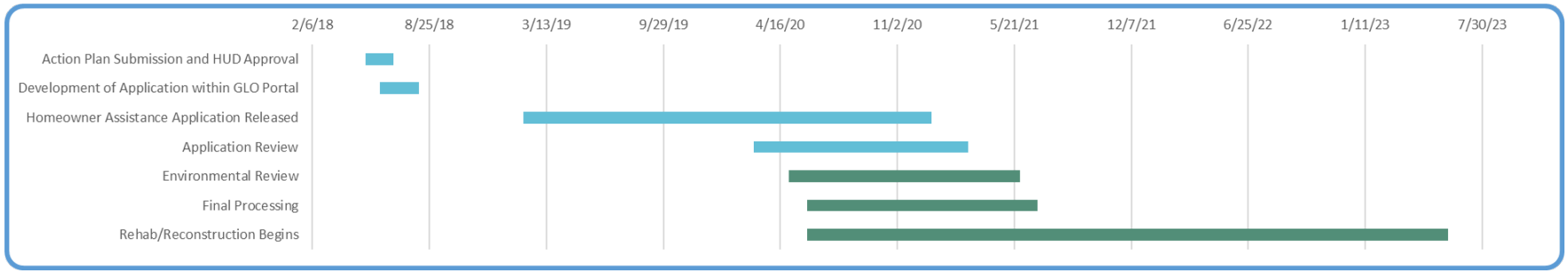
9.1. Appendix C: Program Execution Timelines – State Action Plan

While a number of factors may contribute to the timeline and execution of recovery programs, the following is an estimated timeline for housing and infrastructure programs.

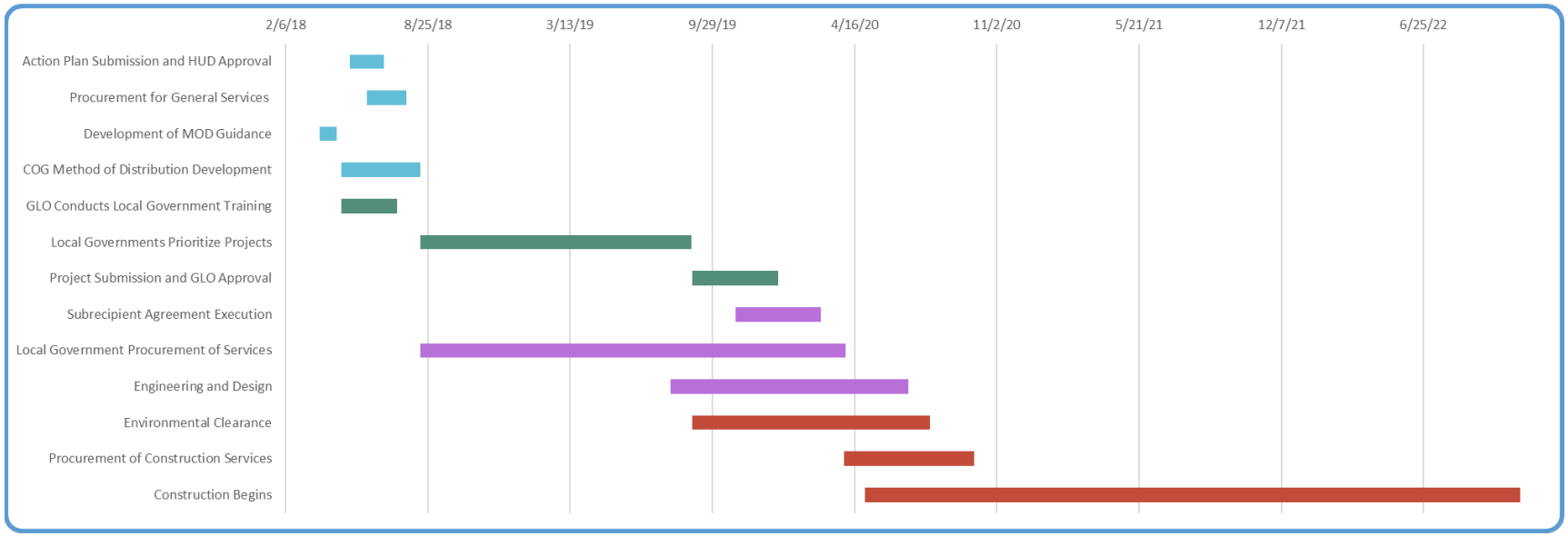
A. Housing Program Timeline



B. Harris County and City of Houston Housing Program Timeline



C. Infrastructure Program Timeline



10.1. Appendix D: Projected Expenditures and Outcomes

Actual Expenditures through 2025 1st Quarter and projected expenditures though the end of grant term.

		2018				2019			
Program	Allocation	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883			$ -	$ 2,869,540	$ 27,793,109	$ 17,186,168	$ 25,729,774	$ 70,000,204
Non-Housing	$ 1,224,780,745			$ -	$ -	$ 3,139,768	$ 259,580	$ 442,378	$ 1,442,243
Planning & Admin	$ 476,630,372			$ 1,124,185	$ 4,740,368	$ 6,192,370	$ 8,378,885	$ 5,908,755	$ 7,895,197
Grand Total	$ 5,676,390,000	$ -	$ -	$ 1,124,185	$ 7,609,908	$ 37,125,247	$ 25,824,633	$ 32,080,906	$ 79,337,644

		2020				2021			
Program	Allocation	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883	$ 117,973,020	$ 219,590,791	$ 181,129,029	$ 179,302,710	$ 211,211,080	$ 211,719,139	$ 238,934,414	$ 194,472,694
Non-Housing	$ 1,224,780,745	$ 1,521,937	$ 3,138,558	$ 4,636,315	$ 12,340,186	$ 7,774,702	$ 19,749,076	$ 28,628,132	$ 24,199,724
Planning & Admin	$ 476,630,372	$ 9,884,358	$ 9,883,486	$ 12,417,219	$ 16,721,647	$ 10,706,557	$ 11,463,927	$ 17,515,982	$ 22,285,906
Grand Total	$ 5,676,390,000	$ 129,379,315	$ 232,612,834	$ 198,182,562	$ 208,364,543	$ 229,692,338	$ 242,932,141	$ 285,078,529	$ 240,958,324

		2022				2023			
Program	Allocation	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883	$ 269,122,149	$ 205,247,709	$ 169,538,664	$ 199,408,062	$ 167,931,398	$ 182,319,824	$ 140,243,281	$ 128,158,361
Non-Housing	$ 1,224,780,745	$ 34,000,199	$ 43,711,468	$ 31,891,735	$ 51,294,318	$ 34,514,702	$ 41,532,929	$ 30,636,832	$ 56,865,693
Planning & Admin	$ 476,630,372	$ 23,848,224	$ 20,396,668	$ 15,722,833	$ 19,135,071	$ 21,593,926	$ 19,427,020	$ 18,779,715	$ 21,245,105
Grand Total	$ 5,676,390,000	$ 326,970,572	$ 269,355,845	$ 217,153,232	$ 269,837,451	$ 224,040,026	$ 243,279,773	$ 189,659,829	$ 206,269,159

		2024				2025			
Program	Allocation	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883	$ 107,622,675	$ 131,998,758	$ 100,302,280	$ 77,555,944	$ 14,570,768	$ 35,000,000	$ 50,000,000	$ 60,000,000
Non-Housing	$ 1,224,780,745	$ 38,243,582	$ 54,733,630	$ 39,846,124	$ 31,038,747	$ 22,389,955	$ 30,000,000	$ 45,000,000	$ 55,000,000
Planning & Admin	$ 476,630,372	$ 19,539,587	$ 20,703,956	$ 12,613,760	$ 10,414,549	$ 9,839,778	$ 7,000,000	$ 7,000,000	$ 8,000,000
Grand Total	$ 5,676,390,000	$ 165,405,844	$ 207,436,344	$ 152,762,164	$ 119,009,239.92	$ 46,800,501	$ 72,000,000	$ 102,000,000	$ 123,000,000

		2026				2027			
Program	Allocation	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883	$ 45,000,000	$ 40,000,000	$ 30,000,000	$ 30,000,000	$ 25,000,000	$ 20,000,000	$ 15,000,000	$ 10,000,000
Non-Housing	$ 1,224,780,745	$ 60,000,000	$ 75,000,000	$ 70,000,000	$ 70,000,000	$ 65,000,000	$ 50,000,000	$ 30,000,000	$ 20,000,000
Planning & Admin	$ 476,630,372	$ 12,000,000	$ 10,000,000	$ 12,000,000	$ 8,000,000	$ 6,000,000	$ 5,000,000	$ 5,000,000	$ 5,000,000
Grand Total	$ 5,676,390,000	$ 117,000,000	$ 125,000,000	$ 112,000,000	$ 108,000,000	$ 96,000,000	$ 75,000,000	$ 50,000,000	$ 35,000,000

		2028			
Program	Allocation	Q1	Q2	Q3	Q4
Housing	$ 3,974,978,883	$ 8,000,000	$ 8,000,000	$ 7,047,340	$ -
Non-Housing	$ 1,224,780,745	$ 14,000,000	$ 12,000,000	$ 10,808,231	$ -
Planning & Admin	$ 476,630,372	$ 5,000,000	$ 5,000,000	$ 3,251,341	$ -
Grand Total	$ 5,676,390,000	$ 27,000,000	$ 25,000,000	$ 21,106,912	$ -

Figure 46: Anticipated Federal Expenditures Over Time

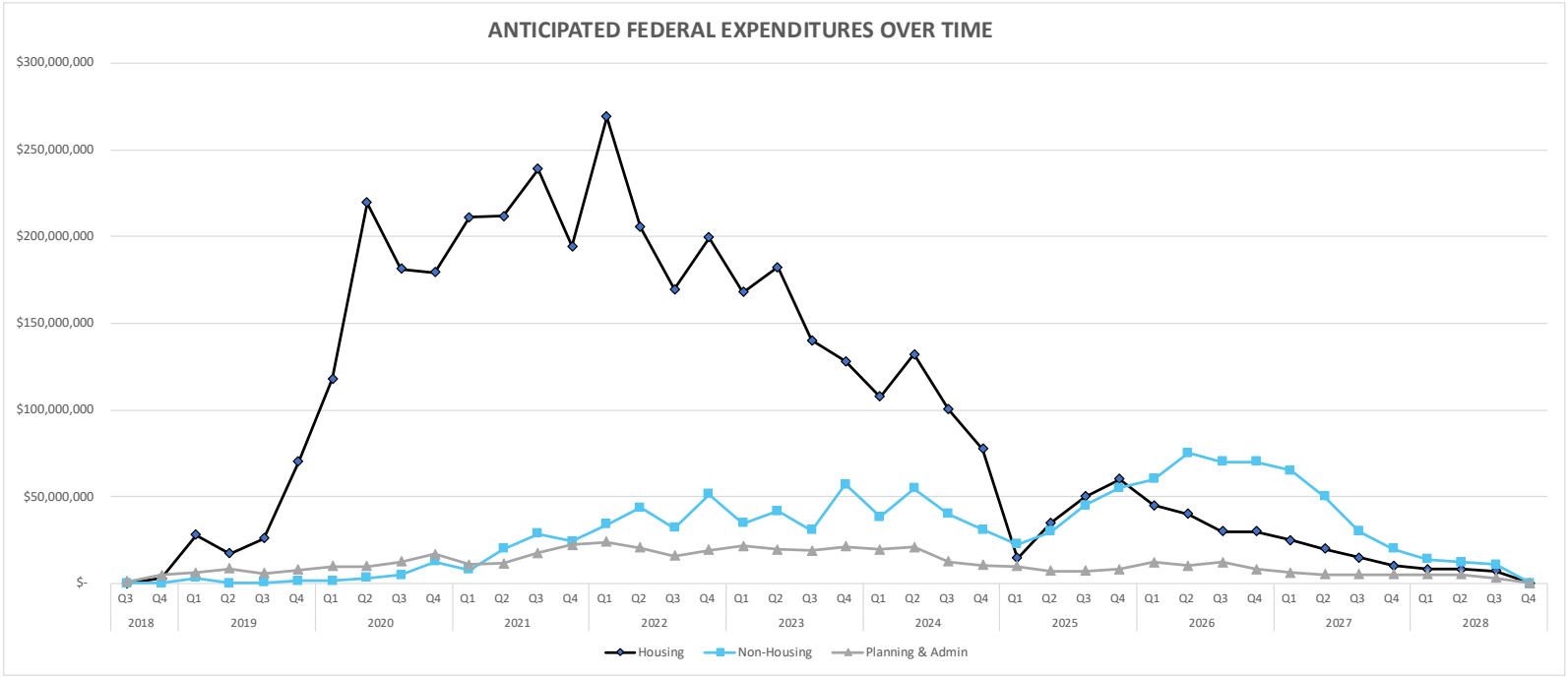
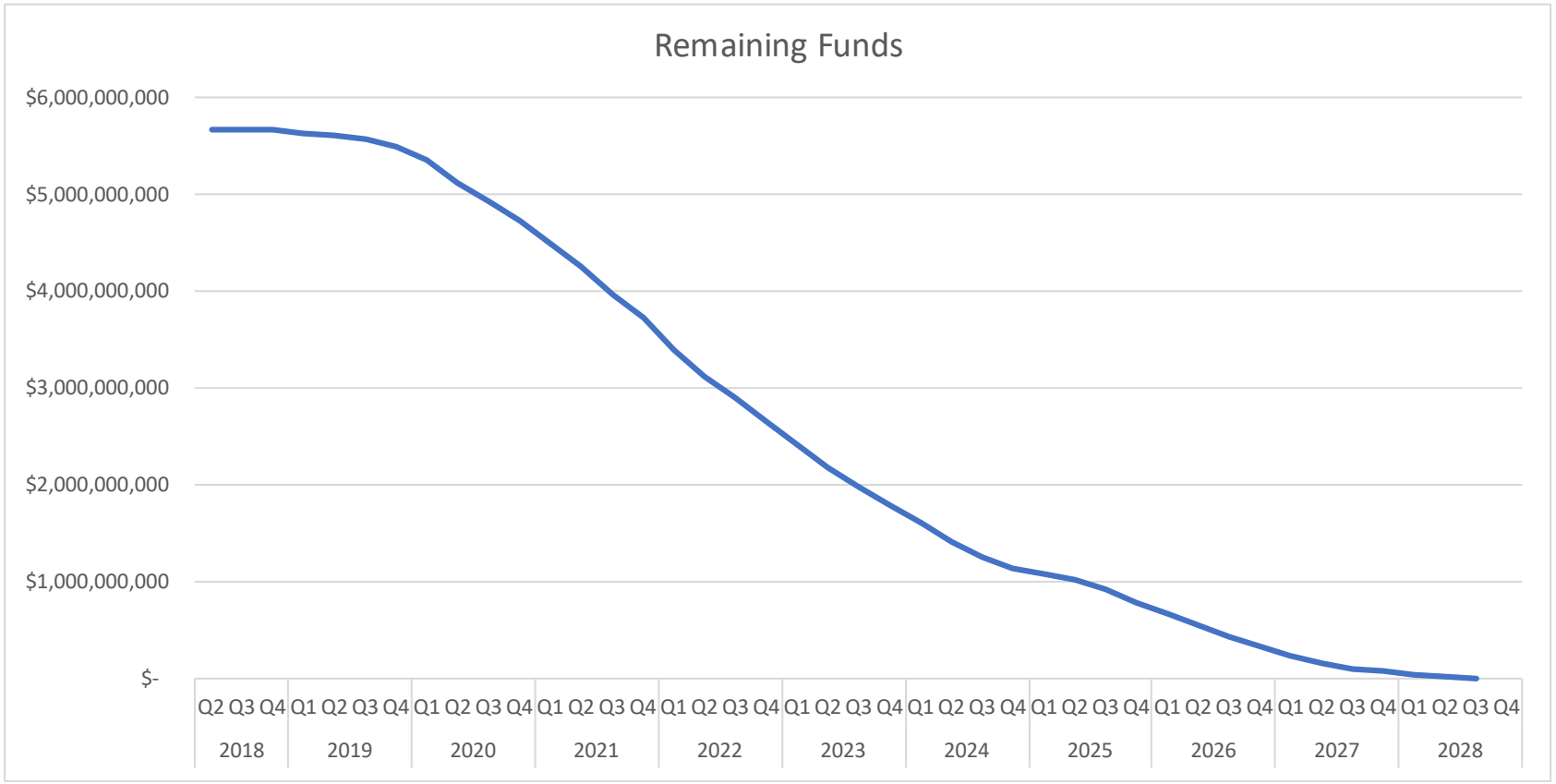


Figure 47: Total Remaining Funds



Actual Accomplishments through 2024 4th Quarter and projected accomplishments though the end of grant term.

Table 60: Actual Accomplishments

		2018				2019			
Program	Outcomes	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	-	-	-	-	-	-	-	-
Affordable Rental Housing	12,761	-	-	-	-	-	-	-	-
Clearance and Demolition	33	-	-	-	-	-	-	-	-
Construction of new housing	356	-	-	-	-	-	-	-	-
Homeownership Assistance	742	-	-	-	-	-	-	-	-
Rehabilitation/reconstruction of residential structures	27,980	-	-	-	-	-	-	-	-
Relocation payments & Housing incentives	2,082	-	-	-	-	-	-	-	-
Economic Development	1,938	-	-	-	-	-	-	-	-
Public Services	362,581	-	-	-	-	-	-	-	-
Rehabilitation/reconstruction of a public improvement	2,634,404	-	-	-	-	-	-	-	-
Public Facilities	158	-	-	-	-	-	-	-	-
Planning	21	-	-	-	-	-	-	-	-
Grand Total	3,044,942	-	-	-	-	-	-	-	-

		2020				2021			
Program	Outcomes	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	-	-	-	-	-	-	-	-
Affordable Rental Housing	12,761	138	-	-	-	-	-	-	-
Clearance and Demolition	33	-	-	-	-	-	-	-	-
Construction of new housing	356	-	-	-	-	-	-	-	-
Homeownership Assistance	742	4	29	42	50	11	82	29	73
Rehabilitation/reconstruction of residential structures	27,980	17,556	2,253	2,908	2,494	(1,740)	542	(1,205)	606
Relocation payments & Housing incentives	2,082	-	-	-	-	-	-	-	-
Economic Development	1,938	-	-	-	-	-	-	-	-
Public Services	362,581	-	-	-	-	7	453	87	53
Rehabilitation/reconstruction of a public improvement	2,634,404	-	-	-	-	-	-	1,380	-
Public Facilities	158	-	-	-	-	-	-	-	-
Planning	21	-	-	-	-	-	-	-	1
Grand Total	3,044,942	17,698	2,282	2,950	2,544	(1,722)	1,077	291	733

		2022				2023			
Program	**Outcomes**	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	-	-	2	-	4	1	-	-
Affordable Rental Housing	12,761	-	-	-	-	-	640	1,169	631
Clearance and Demolition	33	-	-	-	-	-	-	-	-
Construction of new housing	356	-	-	-	-	-	-	-	-
Homeownership Assistance	742	26	21	24	27	36	28	5	4
Rehabilitation/reconstruction of residential structures	27,980	496	562	455	507	405	310	200	194
Relocation payments & Housing incentives	2,082	-	-	-	-	8	3	5	33
Economic Development	1,938	7	414	772	281	283	98	19	26
Public Services	362,581	279	446	234	2,524	34	1,988	-	11
Rehabilitation/reconstruction of a public improvement	2,634,404	-	-	2	-	25,789	5,370	14,145	3,458
Public Facilities	158	-	-	1	-	-	-	-	-
Planning	21	(1)	-	-	-	-	-	-	-
Grand Total	3,044,942	807	1,443	1,490	3,339	26,559	8,438	15,543	4,357

		2024				2025			
Program	**Outcomes**	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	1	13	2	-	-	15	19	35
Affordable Rental Housing	12,761	1,413	947	428	873	288	780	975	500
Clearance and Demolition	33	-	-	-	-	-	-	4	4
Construction of new housing	356	-	-	-	-	5	-	15	20
Homeownership Assistance	742	-	-	-	-	-	10	10	15
Rehabilitation/reconstruction of residential structures	27,980	915	177	120	158	67	-	-	-
Relocation payments & Housing incentives	2,082	22	137	4	6	26	90	150	180
Economic Development	1,938	51	16	(29)	-	-	-	-	-
Public Services	362,581	-	-	57	-	-	3,000	5,000	7,000
Rehabilitation/reconstruction of a public improvement	2,634,404	50,604	2,674	95,832	3,659	4,635	20,000	20,000	80,000
Public Facilities	158	-	-	-	-	-	25	20	10
Planning	21	-	-	-	-	-	-	1	2
Grand Total	3,044,942	53,006	3,964	96,414	4,696	5,021	23,920	26,194	87,766

		2026				2027			
Program	**Outcomes**	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	60	85	110	130	150	220	275	300
Affordable Rental Housing	12,761	501	525	650	500	505	438	320	210
Clearance and Demolition	33	5	6	5	3	2	2	2	-
Construction of new housing	356	40	45	35	50	45	35	30	16
Homeownership Assistance	742	20	20	20	40	40	30	11	11
Rehabilitation/reconstruction of residential structures	27,980	-	-	-	-	-	-	-	-
Relocation payments & Housing incentives	2,082	250	210	240	190	150	130	100	80
Economic Development	1,938	-	-	-	-	-	-	-	-
Public Services	362,581	25,000	18,000	40,000	90,000	75,000	60,000	20,000	12,408
Rehabilitation/reconstruction of a public improvement	2,634,404	110,000	160,000	240,000	360,000	420,000	520,000	220,000	140,000
Public Facilities	158	15	8	12	12	10	20	10	8
Planning	21	1	2	1	1	1	2	3	2
Grand Total	3,044,942	135,892	178,901	281,073	450,926	495,903	580,877	240,751	153,035

		2028			
Program	**Outcomes**	Q1	Q2	Q3	Q4
Acquisition - buyout of residential properties	1,886	250	120	94	-
Affordable Rental Housing	12,761	140	110	80	-
Clearance and Demolition	33	-	-	-	-
Construction of new housing	356	10	5	5	-
Homeownership Assistance	742	11	10	3	-
Rehabilitation/reconstruction of residential structures	27,980	-	-	-	-
Relocation payments & Housing incentives	2,082	49	11	8	-
Economic Development	1,938	-	-	-	-
Public Services	362,581	1,000	-	-	-
Rehabilitation/reconstruction of a public improvement	2,634,404	70,000	50,000	16,856	-
Public Facilities	158	7	-	-	-
Planning	21	1	3	1	-
Grand Total	3,044,942	71,468	50,259	17,047	-

Figure 48: Anticipated Accomplishments Over Time

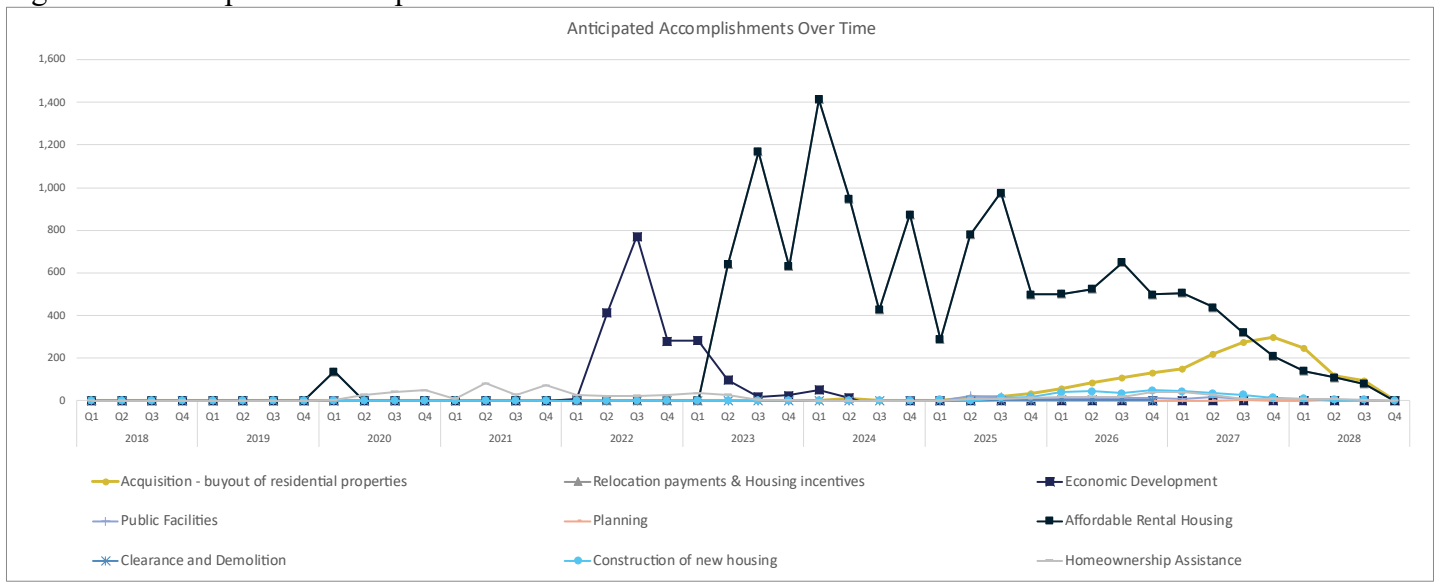
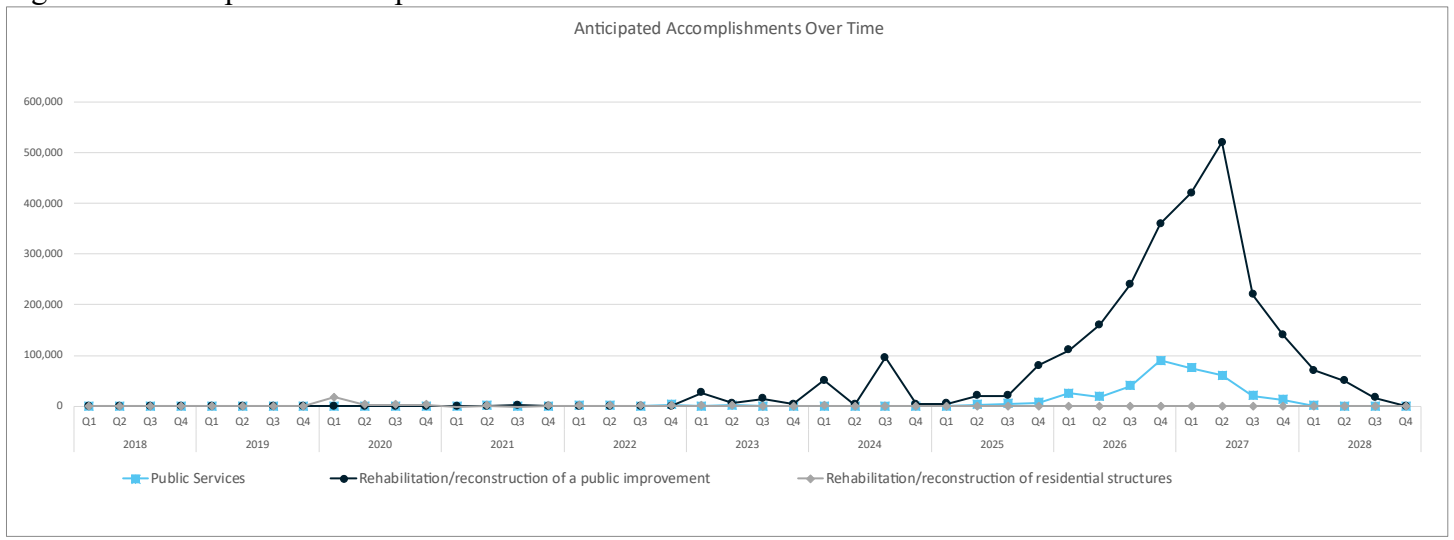


Figure 49: Anticipated Accomplishments Over Time



11.1. Appendix E: Consultations – State of Texas

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
8/29/2017	Cities of Port Lavaca, Robstown, Corpus Christi	Assessed damage
8/30/2017	City of Port Aransas	Toured damaged areas with elected officials
8/31/2017	City of Corpus Christi	Met with the City to discuss recovery needs
9/1/2017	Brad Gair, Witt O'Brien's	Discussed use of FEMA short term housing with CDBG-DR long term housing
9/2/2017	Shelter at Home - Louisiana	Discussed use of FEMA short term housing with CDBG-DR long term housing
9/7/2017	House Urban Affairs Committee Hearing - Austin	Texas Department of Housing and Community Affairs
9/8/2017	Texas Appleseed	Discussed Hurricane Harvey Recovery
9/12/2017	Rebuild Texas & Governor's Hurricane Harvey	Harris County, City of Houston
9/12/2017	State Delegation - Houston	Listening session and CDBG-DR program brief
9/12/2017	City of Houston	Damage Brief
9/13/2017	Texas Water Infrastructure Coordination Committee	Discussed CDBG-DR funds for potential Harvey allocation; TCEQ, TWDB, other federal and state partners
9/13/2017	Congressman Pete Olson Townhall - City of Houston	Various neighborhoods impacted by flooding
9/13/2017	Call with Congressman Culberson's Office	Discussed recovery needs of the district, FEMA and CDBG-DR programs, and eligibility
9/13/2017	Call with Senator Cornyn's Office	Discussed recovery needs of the district, FEMA and CDBG-DR programs, and eligibility
9/14/2017	Nueces and San Patricio Counties	Discussed housing needs
9/15/2017	Call with State Representative James White	Discussed Hurricane Harvey Recovery
9/18/2017	Rebuild Texas & Governor's Hurricane Harvey	Jefferson County, City of Port Arthur, Orange County, City of Orange discussed NFIP ratings, match needs for FEMA Programs, and faster housing programs

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
9/18/2017	Texas Delegation Call	Discuss Hurricane Harvey Recovery
9/22/2017	South East Texas with HUD Secretary Carson	Discussed mold in flooded units, mitigation, need for equitable distribution of funds
9/22/2017	Texas Association of Regional Councils Board of Directors	Discussed 2015 & 2016, update on Harvey recovery
9/26/2017	Texas Delegation Call	Discussed Hurricane Harvey Recovery related to buyouts and elevation
9/27/2017	Congressman Pete Olson Townhall - north Houston	Discussed Hurricane Harvey Recovery related to repetitive flood prone areas in north Houston
9/28/2017	Rebuild Texas & Governor's Hurricane Harvey	Liberty County, City of Liberty, City of Sour Lake, and Hardin County discussed need for fewer rules to expedite recovery, allow churches to be reimbursed for expenses and damage, and more details on the websites
10/2/2017	House Appropriations Committee Hearing - City of Houston	Harris County, Houston, Fort Bend
10/3/2017	Lieutenant Governors Townhall - West Houston	Discussed Hurricane Harvey Recovery
10/4/2017	Lieutenant Governor's Townhall - Clear Lake (Harris/Galveston Counties)	Discussed Hurricane Harvey Recovery
10/4/2017	City of Baytown	Discussed Hurricane Harvey Recovery related to buyouts, housing, and flood mitigation
10/6/2017	Public Utilities Commission	Reviewed needs for recovery
10/9/2017	Galveston County	Toured the Gulf Intercoastal Waterway
10/9/2017	Rebuild Texas & Governor's Hurricane Harvey	City of Rockport, Aransas County, City of Aransas Pass, City of Refugio, City of Port Lavaca, and City of Victoria discussed debris, 600 apartments lost, mold, insurance issues, and need for alert systems
10/10/2017	Rebuild Texas & Governor's Hurricane Harvey	City of Wharton, Matagorda County, Brazoria County, City of Sugarland, Bay City, City of Angleton, and City of Dickinson discussed FEMA denials, need for match, procurement requirements, non LMI homeowners impacted too, and fund distribution

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
10/11/2017	Bureau of Economic Geography	Discussed Hurricane Harvey data and effects
10/11/2017	Rebuild Texas & Governor's Hurricane Harvey	Cities of Kountze, Liberty, Anahuac, Port Arthur, Orange discussed debris, infrastructure, Hwy 87, funds for all cities and counties, and drainage
10/13/2017	DETCOG Hurricane Harvey Kickoff	Discussed needs for the region and short-term housing
10/16/2017	Congressional Staff at the Joint Field Office	Program briefs for both FEMA and CDBG-DR programs
10/16/2017	Christus Health	Discussed housing and health needs of Port Arthur & Beaumont area
10/18/2017	HGAC Hurricane Harvey Kickoff	Discussed needs for the region and short-term housing
10/20/2017	SETRPC Hurricane Harvey Kickoff	Discussed needs for the region and short-term housing
10/20/2017	CBCOG Hurricane Harvey Kickoff	Discussed needs for the region and short-term housing
10/23/2017	Direct Housing Playbook & Short & Long-Term housing opportunities	Long term recovery
10/24/2017	Senate Finance Committee Hearing - Austin, TX	Texas Military Department, State Health Services, Texas Education Agency
10/25/2017	Texas Association of Builders	Discussed sources, availability, and shortages
10/25/2017	State Representative Todd Hunter	Discussed Hurricane Harvey Recovery
10/26/2017	CAPCOG Hurricane Harvey Kickoff	Discussed needs for the region, and short-term housing
10/27/2017	Joint Housing Task Force	Discussed Hurricane Harvey Recovery
11/2/2017	Texas Homelessness Network and True Casa Consulting	Discussed homeless needs and solutions
11/3/2017	American Planning Association of Texas	Discussed Hurricane Harvey Recovery
11/3/2017	City of Dickinson	Discussed Hurricane Harvey Recovery and Dickinson Bayou
11/6/2017	Texas Apartment Association	Discussed inventory and potential programs

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
11/8/2017	House Appropriations Hearing - Corpus Christi, TX	City of Port Aransas, City of Corpus Christi, Aransas County, Christus Health System, Refugio ISD, City of Fulton, Taft ISD, Wharton County Junior College, TEA, Nueces County, and San Patricio County
11/9/2017	City of Houston	Discussed Hurricane Harvey Recovery, and Houston data on damaged units
11/10/2017	Harris County	Discussed Hurricane Harvey Recovery
11/16/2017	Victoria County	Discussed Hurricane Harvey Recovery
11/16/2017	GCRPC Meeting	Disaster Recovery planning and staffing needs
11/17/2017	FEMA Floodplain Management & Insurance	Discussed uses of CDBG-DR funds and leverage needs
11/21/2017	Chambers County	Discussed Hurricane Harvey Recovery
11/21/2017	Newton County	Discussed Hurricane Harvey recovery related to housing and road repairs
11/28/2017	City of Richmond Round Table	Discussed city needs related to Harvey Recovery
11/28/2017	Fort Bend County	Discussed Hurricane Harvey Recovery
11/29/2017	GCRPC Kickoff	Discussed needs for the region and short-term housing
11/29/2017	Habitat for Humanity	Discussed available programs
11/30/2017	Congressman Randy Weber	Updated on Recovery efforts and needs
12/4/2017	House Urban Affairs Committee Hearing - Corpus Christi, TX	Corpus Christi Public Housing Authority, City of Port Aransas, City of Aransas Pass, City of Fulton, City of Ingleside, City of Corpus Christi, Aransas County, and City of Rockport
12/6/2017	City of Aransas Pass Delegation	Discussed recovery needs and education
12/7/2017	Housing Strike Team - Aransas County	Aransas County, City of Fulton, and City of Rockport discussed county needs, permitting issues, housing needs, debris operations, and equity in funding allocations
12/7/2017	City of Houston	Discussed Houston's needs and planned programs

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
12/12/2017	State Fair Housing Workgroup	Holistic approach to AFFH by State Agencies
12/13/2017	House Urban Affairs Committee Hearing - Beaumont	City of Galveston, City of Beaumont, Jefferson County, Orange County, Hardin County, HGAC, City of Sour Lake, City of Anahuac, City of Orange, and City of Vidor
12/14/2017	Texas Association of Builders	Discussed coming program needs and potential inventory
12/15/2017	State Hurricane Harvey Crisis Counseling Program	Consider needs of both victims and program staff
12/18/2017	Texas Department of Housing & Community Affairs	Discussed homelessness initiatives
12/18/2017	State Representative James White	Discussed needs of the district, preagreement and other eligibility
12/18/2017	City of Houston	Discussed multifamily needs
12/19/2017	Nueces County	Nueces County Commissioner's Court Testimony
12/20/2017	House Land & Resource Management Committee Hearing - Corpus Christi, TX	Nueces County, Port Aransas, San Patricio County, City of Aransas Pass, City of Fulton, City of Corpus Christi, and City of Rockport
12/22/2017	Texas Low Income Housing Information Services	Discussed Program and Subrecipient needs
1/3/2018	Nueces County	Discussed Hurricane Harvey Recovery discussed time table for funds, mitigation, housing needs, and tourism
1/4/2018	City of Houston	Discussed Hurricane Harvey Recovery, direct allocation, MOD at the GLO, buyouts, and duplication of benefit
1/4/2017	Cities of Beaumont and Orange	Visited damaged 80 unit multifamily site and other areas
1/5/2018	Meeting with Quicken Loans	Discussed needs of mortgagees and insurance issues
1/8/2017	SETRPC	Discussed long term recovery and needed preparation
1/9/2018	City of Galveston	Discussed Hurricane Harvey Recovery
1/11/2018	Texas State Agency's Business Administrators' Association (TSABAA) conference - Kerrville, TX	Brief the concept and state of the housing program to other state agencies

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
1/12/2018	Aransas County and Texas Appleseed	Discussed the recovery needs of the County and AFFH
1/12/2018	House Appropriations Committee Hearing - Beaumont, TX	City of Beaumont, Jefferson County, Orange County, Memorial Hermann Health System, Hardin County, Baptist Hospital, Orange, Chambers County, and City of Vidor
1/17/2018	HOPE NOW Alliance	Discussed foreclosure prevention
1/18/2018	House Urban Affairs Committee Hearing - Houston, TX	City of Houston, City of Galveston, Harris County, HGAC, Houston Habitat for Humanity, and Texas Housers
1/18/2018	House General Investigations & Ethics Committee Hearing - Houston, TX	Houston, Galveston, Harris County, Catholic Charities
1/19/2018	University Systems Chancellors	Discussed planning needs
1/23/2018	Housing Strike Team - San Patricio County	San Patricio County, City of Ingleside on the Bay, San Patricio County PHA, City of Sinton, City of Portland, San Patricio EDC, Aransas Pass Chamber of Commerce, and Ingleside Chamber of Commerce discussed local capacity issues, public housing needs, fund distribution, low income housing, and mitigation
1/26/2018	Congressman Blake Farenthold Q&A Session - Corpus Christi, TX	Discussed Hurricane Harvey Recovery
1/30/2018	Senate Finance Committee Hearing - Austin, TX	Texas Comptroller and Legislative Budget Board discussed Hurricane Harvey Recovery
1/30/2018	Hardin County	Discussed housing needs for both short term and long term
2/1/2018	Texas Association of Regional Councils Board of Directors	Hurricane Harvey Brief and Q&A
2/2/2018	Texas Low Income Housing Information Services	Discussed hurricane survivor recovery rights, principles, and initiatives
2/5/2017	Housing Strike Team - Montgomery County	Montgomery County, Patton Village, City of Roman Forest, Woodlands Township, and United Way discussed drainage needs, need for speed in recovery, housing, ensuring everyone can participate equitably, need for match from CDBG, and buyouts

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
2/6/2018	Audubon	Discussed potential projects
2/7/2018	Housing Strike Team - Galveston County	Galveston County, City of Friendswood, League City, City of Dickinson, City of La Marque, City of Kemah, City of Galveston, City of Clear Lake Shores, City of Texas City, City of Santa Fe, and H-GAC discussed need for speed in recovery efforts, drainage issues in repetitively flooded bayous, leveraging of other federal resources
2/9/2018	Texas Association of Businesses Annual Conference	Outlined programs for Hurricane Harvey Recovery
2/12/2018	HUD Community Planning & Development	Discussed program requirements
2/13/2018	Housing Strike Team - Jefferson, Hardin, & Orange Counties	Hardin County, Jefferson County, Orange County, City of Beaumont, and Tri-County Disaster Recovery discussed need to recover as quickly as possible, communities' inability to meet FEMA PA cost share, and overall and regional housing needs
2/13/2018	Alvin Chamber of Commerce	Discussed Brazos River flooding in areas never flooded before
2/14/2018	Town Hall for Newton County and City of Lumberton	Q&A related to programs
2/14/2018	Housing Strike Team - Port Arthur, TX	City of Port Arthur, Port Arthur EDC, Port Arthur Housing Authority discussed housing needs, consideration for overall community recovery, pending foreclosure issues, 80 percent of homes impacted, and distribution of funds
2/15/2018	Housing Strike Team - Newton & Jasper Counties	Newton County, Jasper County, and DETCOG discussed repetitive impact areas, housing, and transpiration needs
2/16/2018	State Senator Jane Nelson Staff Meeting	Discussed eligible uses of CDBG-DR funds
2/20/2018	Senate Finance Committee Hearing - Austin, TX	Updated on recovery efforts and needs
2/20/2018	Villages Round Table	Discussed Action Plan programs, future allocations, repetitive flooding and non LMI needs.
2/20/2018	Affordable Rental Housing Presentation - Aransas County	Discussed affordable rental housing needs and programs

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
2/23/2018	Aransas County	Discussed recovery needs
2/23/2018	City of the Woodlands	Discussed drainage planning study in Spring Creek
2/26/2018	Round Table Discussion, Houston Harvey Recovery, 6 months later at UHD	FEMA and City of Houston officials. Answered Student and Moderator Questions KTRK Houston
2/27/2018	Regional Interagency Steering Committee	Discussed opportunities utilize various funding sources toward recovery
3/1/2018	Housing Strike Team - Wharton County	Discussed need for apartments, repetitive flooding areas, business needs
3/2/2018	City of Houston	Discussed the Action Plan and programs
3/6/2018	Texas State Transportation Innovation Council	Harvey CDBG-DR program presentation
3/6/2018	Harris County	Discussed the Action Plan and programs
3/7/2018	Harris County	Discussed the Action Plan and programs, capacity of the County, and direct allocations
3/8/2018	House Land & Resource Management - Houston, TX	Harris County, Chambers County, Houston, and City of Dickinson
3/9/2018	City of Houston	Discussed Action Plan, needs assessment, and programs
3/14/2018	City of Houston, Harris County, and HUD - Washington, D.C.	City of Houston, Harris County, and HUD discussed unmet needs and recovery programs
3/22/2018	Harris County	Met with county officials
4/17/2018	Brazoria County - San Bernard River	County officials, observed impact that rushing water had on misdirecting flooding during Hurricane Harvey and for future rain events
5/2/2018	Coastal Bend Hurricane Conference - Corpus Christi	Addressed statewide attended event of emergency management personnel
5/2/2018	Port Arthur	County and local elected officials, discussed Hurricane Harvey recovery
5/2/2018	Port Arthur	City officials, discussed Hurricane Harvey recovery funding
5/24/2018	Lufkin	DETCOG, updated on Hurricane Harvey Recovery
6/28/2018	Harris County	County official, discussed CDBG-DR funding process

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
6/28/2018	City of Houston	Met with city officials
6/28/2018	City of Houston	City officials, discussed Hurricane Harvey recovery
7/6/2018	Rockport	Coastal Bend local elected officials
7/6/2018	South East Texas	SETRPC, discussed Harvey Recovery and funding processes for rebuilding
7/25/2018	City of Houston	CDBG-DR funding, speech
7/25/2018	City of Clear Lake	Clear Lake Chamber of Commerce, speech
9/24/18	Aransas Pass	Corpus Christi & Aransas Pass public housing authorities discussed unmet needs
9/25/18	Livingston	Livingston and Newton public housing authorities discussed unmet needs
9/27/18	La Grange	La Grange Public Housing Authority discussed unmet needs
10/02/18	Beaumont	Beaumont, Port Arthur and Orange public housing authorities discussed unmet needs

11.2. Appendix E: Consultations – Harris County

Date	Location	Parties Represented
Monday, April 16, 2018	Harris County Community Services Department	Focus Group Meeting on Residential Buyout Program LISC, HC Flood Control District, Texas Southern University, Kinder Institute/Rice University, Greater Houston Fair Housing Center, Lone Star Legal, Texas Low Income Housing Information (Texas Housers)
Thursday, May 24, 2018	Harris County Community Services Department	Organizational Stakeholder Meeting on Supplement Amendment to State's Action Plan process and community engagement. Sierra Club, LISC, TOP, HC Flood Control District, SEER, Kinder Institute/Rice University, Greater Houston Fair Housing Center, Lone Star Legal, Texas Low Income Housing Information (Texas Housers)
Wednesday May 30th 4:30pm to 7:30pm	Crosby Community Center 409 Hare Rd; Crosby, TX 77532	Community Meeting Pct 2-Sheldon, Barrett Station, Crosby, Channelview, Huffman
Thursday May 31st 4:30pm to 7:30pm	Northeast Community Center (James Driver Park) 10918 Bentley St.; Houston, TX 77093	Community Meeting Pct 2 & 1-Aldine, Airline, El Dorado, Northington-Kentwood, Sherwood Place
Tuesday, June 5th 8:30am to 11:00am	BakerRipley - Cleveland Campus 720 Fairmont Pkwy; Pasadena, TX 77504	Community Meeting Pct 2-Pasadena, South Houston, Galena Park
Wednesday, June 6th 4:30pm to 7:30pm	Weekly Community Center 8440 Greenhouse Rd; Cypress, TX 77433	Community Meeting Pct 3 & 4-Bear Creek, Copperfield, Katy, Cypress
Thursday, June 7th 4:30pm to 7:30pm	Leon Z Grayson/Baldree Community Center 13828 Corpus Christi St; Houston, TX 77015	Community Meeting Pct 2 & 1-Galena Park, Jacinto City, South Houston, Cloverleaf, Sheldon, Channelview
Thursday, June 7th 7:00pm to 8:00pm	TOP Partner Meeting HD Center 13701 Victoria St. Houston, TX 77015	Community Meeting Cloverleaf, Normandy Crossing, Texas Organizing Project (TOP)
Tuesday, June 12th 4:30pm to 7:30pm	El Franco Lee Community Center	Community Meeting

Date	Location	Parties Represented
	9500 Hall Rd; Houston, TX 77089	Pct 1-Pearland, Friendswood, Webster, Seabrook
Wednesday, June 13th 4:30pm to 7:30pm	Phillip Cezeaux Recreation Bldg 100 N. Houston Ave; Humble, TX 77338	Community Meeting Pct 4- Humble, Mercer, Bordersville, North Belt
Thursday, June 14th 4:30pm to 7:30pm	Baytown Community Center 2407 Market Street; Baytown, TX 77520	Community Meeting Pct 2-Baytown, McNair, Linus, Channelview, Jacinto City, Cloverleaf
Wednesday, June 20th 1pm to 2pm	Houston Center for Independent Living (CIL)	Focus Group meeting with CIL
Thursday, June 21st 7:00pm to 8:00pm	Sweet Home MBC 2503 16th St Galena Park, TX 77547	Community Meeting Galena Park, Jacinto City, Texas Organizing Project (TOP)
Friday. June 22nd 7:00pm to 8:00pm	Greater New Grove Worship Center 7518 East Mt Houston Rd Houston, TX 77050	Community Meeting Texas Organizing Project (TOP)
Saturday, June 23rd 7:00pm to 8:00pm	The Rock International Ministries 14814 Lee Road, Humble TX 77396	Community Meeting Texas Organizing Project (TOP)

11.3. Appendix E: Consultations – City of Houston

The City received rich feedback from all public meetings, through surveys, written notes, and map-based observations at the neighborhood level. The following are initial observations and a listing of meetings:

- **Some people have been able to rebuild, but others are stuck in unsafe homes:** All Houstonians prioritize the rebuilding of their homes. But there are differences in how quickly different communities have been able to recover based on their access to the resources needed for rebuilding. In areas where residents have repeatedly flooded or where poverty rates are high, some residents described still living in homes that have not been fully gutted, or with persistent mold that is causing health problems almost a year after the storm. Many people are worried that their homes aren't high enough to avoid future damage. And some residents who have undertaken repairs reported incurring personal debt to meet these costs.

- **Housing and drainage are deeply connected:** While our meetings were primarily about housing recovery, most people also identified drainage as a major concern. Outdated drainage infrastructure, lack of drainage maintenance, the need for varied stormwater management solutions, and enforcement of stormwater standards for new development were issues that residents identified in our meetings across the city.

- **In areas that didn't flood, longtime residents want protection from displacement:** Especially in close-in areas with short transit times to downtown, residents are concerned about being displaced. They fear that long-standing communities will break up in the face of real estate speculation, gentrification, rising rents, and increasing property taxes after Harvey.

- **In areas that flooded severely, a rise in vacant homes is threatening the fabric of communities:** Residents in areas with repeated flooding identified checkerboarded buyouts and a rise in damaged homes that have been abandoned as eroding the cohesiveness of their communities and the value of their homes.

- **Vulnerable Houstonians need special attention:** In every meeting, people expressed concern for neighbors who they saw as especially vulnerable: seniors, those with disabilities, mental health challenges, and others. They also shared their struggles to navigate multiple case management systems and the lack of reliable information about recovery resources.

- **Harvey heightened housing challenges for renters:** Many renters described moving, sometimes multiple times, since Harvey. They reported struggling to find decent affordable rental units that are safe from flooding. Renters also reported unscrupulous behavior by landlords, such as withholding security deposits or making only cosmetic repairs that left issues like mold unresolved. Many renters had not received FEMA assistance and were unaware of benefits that might have been available to them.

- **People want clear communication from trusted sources:** Especially with the start of hurricane season, residents want clear, easily accessible information from official sources. Information can't be limited to the internet and social media and needs to be available in print and through traditional media like newspapers, radio, and TV, in multiple languages.

- **People don't know what to do about contractor fraud:** Many residents reported losing money to contractors who collected payment without completing necessary repairs. There is a lack of awareness of what to do about contractor fraud, and few residents were aware of the State Attorney General's fraud reporting site at https://texasattorneygeneral.gov/cpd/home-remodeling-and-repair.

- **The loss of small business and community amenities are threatening hard-hit communities:** Communities with high poverty and widespread flooding reported losing small businesses, post offices, libraries, and community centers to the hurricane. People identified these community amenities as essential for providing opportunities for young people and keeping communities vibrant.

- **Delays and confusion in inspection and permitting processes are slowing down rebuilding:** For those with the resources to start rebuilding, frustrations are running high about the complexity and speed of permitting processes. Some who began doing repairs themselves or who have been helped by volunteer groups are receiving fines for not being up to current code. Renters expressed concern about the lack of inspectors for multi-family properties to enforce health and safety regulations

- **People don't understand the disaster recovery process:** Many residents are confused by the different federal, state, local, and non-profit recovery programs, and almost all participants are frustrated with the pace of long-term recovery. Clear communication about the national disaster recovery framework is needed to help manage expectations and receive meaningful feedback from the community.

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
4/25/2018	Small group meeting with potential community engagement partners	Discussed best practices for community engagement and identified potential community partners
5/2/2018	Small group meeting with potential community engagement partners	Discussed format and schedule for community engagement events
5/3/2018	Community engagement coordination meeting with other City Agencies	Consulted with other City Departments to coordinate community engagement
5/9/2018	Small group meeting with potential community engagement partners	Discussed format and schedule for community engagement events
5/16/2018	Small group meeting at 601 Sawyer St. with potential community engagement partners	Discuss format and schedule for community engagement events
5/19/2018	Community Meeting - Partnered with Texas Organizing Project at Harris County AFL-CIO	Gathered need and priority information from community residents, focused on the Eastside
5/20/2018	Presented at the Metropolitan Organization Harvey recovery event at Memorial Drive United Methodist Church	Shared information and answered questions about long-term recovery

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
5/23/2018	Community Meeting - Partnered with Texas Organizing Project at Denver Harbor Multi-Service Center	Gathered unmet need and priority information from community residents, focused on neighborhoods near Denver Harbor
5/24/2018	For Profit Housing Developer Focus Group – Hosted at HCDD office	Gathered information from for-profit developers to assess disaster recovery capacity and best practices for implementing upcoming affordable housing programs
5/25/2018	Non-Profit Housing Developer Focus Group – Partnered with LISC at LISC's offices	Gathered information from non-profit developers specific to expanding capacity for disaster recovery and best practices for implementing upcoming affordable housing programs
5/26/2018	Community Meeting – Partnered with FIEL Houston at FIEL Houston	Gathered unmet need and priority information from community residents, focused on neighborhoods in Southwest Houston
5/29/2018	Community Meeting – Partnered with Texas Organizing Project at Acres Homes Multi-Service Center	Gathered unmet need and priority information from community residents, focused on neighborhoods around Acres Homes
6/2/2018	Community Meeting – Partnered with Texas Organizing Project at Greater St. Matthew Baptist Church	Gathered unmet need and priority information from community residents, focused on neighborhoods in Sunnyside and Southpark
6/2/2018	Community Meeting – Partnered with Texas Organizing Project at the Northeast Multi-Service Center	Gather unmet need and priority information from community residents, focused on neighborhoods in the Northeast
6/2/2018	Participated in the Extreme Weather Ready Expo at the George R. Brown Convention Center	Distributed surveys to residents interested in disaster preparedness
6/6/2018	Teletownhall – Partnered with AARP (English)	Dial-in format to reach seniors and answer questions about recovery
6/7/2018	Teletownhall – Partnered with AARP and Univision (Spanish)	Dial-in format to reach seniors and answer questions about recovery
6/7/2018	Community Meeting – Partnering with Texas Organizing Project at the SW Multi-Service Center	Gather unmet need and priority information from community residents, focused on neighborhoods in the Southwest
6/11/2018	Presented at the Super Neighborhood Alliance meeting at City Hall Annex	Share information with neighborhood leadership

DATE	MEETING	PARTIES REPRESENTED / PURPOSE
6/12/2018	Presented at the Kashmere Gardens Super Neighborhood Council meeting at the Kashmere Multiservice Center	Share information with affected residents about long-term recovery
6/13/2018	Presented on the Disability Community Harvey Recovery Call hosted by the Mayor's Office of People with Disabilities	Share information with disability rights advocates
6/13/2018	Community Meeting – Partnered with Council Members Gallegos and Davis, and Super Neighborhoods 57 and 59 at the Judson Robinson, Sr. Community Center	Gather need and priority information from community residents, focused on neighborhoods in the Pleasantville and Clinton Park neighborhoods
6/14/2018	Presented at the Houston Housing Collaborative at the Montrose Center	Share information with housing advocates
6/16/2018	Community Meeting – Partnered with Council Member Boykins at San Jacinto Community College	Gather need and priority information from community residents, focused on District D
6/16/2018	Presented at the TOP annual meeting at TOP's office	Report back on disaster recovery community meetings co-hosted with TOP
6/18/2018	Community Meeting – Partnered with the Emancipation Economic Development Council at Blackshear Elementary School	Gather need and priority information for community residents, focused on Third Ward
6/19/2018	Community Meeting – Partnered with Council Member Martin at the St. Stephen Presbyterian Church	Gather need and priority information for community residents, focused on Southeast Houston
6/20/2018	Community Meeting – Partnered with Council Member Castex-Tatum	Gather need and priority information from community residents, focused on neighborhoods in District K
6/21/2018	Community Meeting – Partnered with the East Houston Civic Association at the East Houston Civic Association	Gather need and priority information from community residents, focused on neighborhoods in East Houston
6/23/2018	Community Meeting – Partnered with Council Member Travis at the Tallowood Baptist Church	Gather need and priority information from community residents, focused on neighborhoods in District G

12.1. Appendix F: Regional Methods of Distribution

A. State Housing Program Allocations

Hurricane Harvey Housing Allocation Analyses
Professors Patrick Brockett, Rajiv Garg, Linda Golden, James Nolen and Alisa Walch
University of Texas at Austin, March 27, 2018

Updated by GLO-CDR staff as part of Amendment 2 to reflect changes identified by HUD to Texas CDBG-DR grantees regarding methodology for funding allocation under Public Law 115-123 dated April 10, 2018, and most recent available data. These changes were applied to allocate the additional funds distributed to the State Homeowner Assistance Program. No updates were made to the Local Buyout and Acquisition Program because no additional funds were allocated to it.

State Homeowner Assistance Program and Local Buyout/Acquisition Program Allocations

Allocation of State Homeowner Assistance Program Funds Designated in Initial Action Plan

The list of counties and ZIP codes that are to receive at least 80% of the HUD funding allocation, and the remaining counties designated to receive 20% of the HUD funding are specified in the Federal Register (Federal Register/Vol. 83, No. 28 / Friday, February 9, 2018 / Notices). The sub-grouping of counties and ZIP codes are incorporated into the numerical allocation process of the results in the State Homeowner Assistance Program and Local Buyout/Acquisition Program spreadsheets. Altogether there were 16 counties and 11 ZIP codes listed as "most impacted and distressed". These represent the HUD 80% allocation group.

80% State Homeowner Assistance Program and Local Buyout/Acquisition Program Allocation Group Required by HUD in the Federal Register of February 9, 2018

County populations were obtained from the U.S. Census 2016 Update[53]. Specific ZIP code populations cross classified by county were obtained from the U.S. Census Bureau 2010 Decennial Census using total population for county or part within a Texas 5 digit ZIP code tabulation area (ZCTA) 54.

Median housing values for homeowners was obtained from the U.S. Census Bureau State and County Housing Unit Estimates[55]. Housing value for renters was based on construction cost for an 861 square feet rental unit with a footprint of 24'×35'. These construction costs have a nationwide range

[53] https://www.census.gov/search-results.html?page=1&stateGeo=&searchtype=web&cssp =&q=texas +counties+population&search.x=0&search.y=0&search=submit

[54] https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t. For each zip code, this then proceeded as follows: 1) Click on "all geographic types", 2) "Select a Geographic Type" – Select "County (or part) – 880", 3) Select "Texas", 4) Select a 5-digit zip code tabulation area. Select Multiple (Hold "Ctrl" and click on ZIP and County. Can add multiple ZIPs), 5) Click on "Add to Your Selection", 6) Click on "Topics" – "People" – "Basic Count/Estimate" – "Population Total", 7) Click on ID "PI" check box., 8) Click on "View Table", 9) Click "Download" to download data table.

[55] https://www.census.gov/quickfacts/fact/table/US/PST045216 for State and County and http://www.city-data.com/ for zip codes.

of $64,575 to $86,100 per unit [56]. The midpoint of $75,337.50 is used in the renters' unmet needs calculation. The most reasonable data available was used for calculation.

FEMA verified counts of unmet need (both for homeowners and renters) were supplied by FEMA Individual Assistance (IA) registrant data as of February 2, 2018. The categorization of damage severity level thresholds used by FEMA for cross-classifying these unmet needs data (Major-Low Damage Severity, Major-High Damage Severity, and Severe Damage) utilized segments of HUD's "most impacted method" procedure and related the FEMA Verified Loss (FVL) dollar amounts for each registrant to the HUD severity categories.

The spreadsheet column that calculated the unmet need dollar amount for each geography (county or ZIP code) derived its value using the HUD damage severity level categories and the FEMA supplied data on the count of the number of housing units experiencing damage in each of the three HUD designated severity levels, cross classified by county and by renter versus homeowner. The HUD method provided a monetary multiplier value for the unmet need to homeowners in each of the three severity categories, with $58,956 being the unmet need multiplier associated with the Major-Low Damage Severity category, $72,961 being the unmet need multiplier associated with the Major-High Damage Severity category, and $102,046 being the unmet need multiplier associated with the Severe Damage category. Assuming "Severe" damage corresponded to approximately 100% damage, this allowed translation of the unmet need multipliers in each severity category into a percentage damage estimate for the residential unit corresponding to each category. Such a translation was necessary since median home values differ significantly across impacted counties.

Accordingly, unmet need was assessed on the basis of percentage damage times the median home price in the county or ZIP code. For the Major-Low Damage Severity category this percentage of the housing unit value that is unmet need is $58,956/$102,046 = 57.8% of the value of the structure. For the Major-High Damage Severity category, the percentage of damaged home value that is unmet need is $72,961/$102,046 =71.5%. For the Severe Damage category the result is 100% of the value of the house or construction value of the apartment. These percentages were applied to the median price of housing in each county or ZIP code, and then multiplied by the count of damaged homeowner occupied properties in each damage severity category to obtain a category level dollar estimate of unmet needs for the homeowners in each county and ZIP code. These are then summed to arrive at estimated total dollars of unmet needs for homeowners in the county or ZIP code.

For renters a similar procedure is used. The HUD method provides damage category thresholds for renters based on the renter's FVL, with FVL for renters being based on personal property loss. The HUD method does not, however, specify a multiplier for the damage severity categories for renters. Accordingly, the same percentage damage to structure value estimate used for homeowners was also applied to renter damage severity categories (57.8% for the Major-Low Damage Severity category, 71.5% for the Major-High Damage Severity category, and 100% for the Severe Damage category). For renters, instead of the median value of the damaged home being the basis of the calculation as it was for homeowners, the basis for renters was the construction cost of providing an 861 square feet rental unit with a footprint of 24'×35'. This construction cost has a nationwide range of $64,575 to $86,100 per unit as mentioned previously. Again, the midpoint of $75,337.50 was used for valuation total loss for a rental unit, and for renters the percentage in each severity category was applied to this basic value. The percentage times the rental unit construction cost values were multiplied by the count of renters in the severity category to obtain an unmet need value for renters in each of the

[56] https://www.fixr.com/costs/build-apartment

severity categories. Summing over severity categories yielded an estimate of unmet need to renters in the county or ZIP code. The unmet needs for homeowners and renters were added together to calculate the total unmet need value for the county or ZIP code.

A 15% resiliency factor on unmet needs was added to all counties and ZIP codes entries. The resiliency factor represents the enhancements, improvements, or other components integrated into a structure to increase its capacity to respond to, or recover from, a disaster more quickly than if these components had not been integrated.

For counties in the 80% allocation group that had both the county and a ZIP code with parts overlapping with the county designated as highly impacted in the Federal Register, the ZIP code level data were split into ZIP code-county pairs and the unmet need plus resiliency for the county (excluding any overlap with the City of Houston counts) was combined with the ZIP code county pair data for that county to obtain a single combined entity for the county. ZIP code county pair data that involved the same county were also combined into a single entity. For example, Fort Bend (excluding City of Houston and the Fort Bend part of ZIP code 77423) was combined with the Fort Bend part of ZIP code 77423 to obtain a single Fort Bend total entry for the analysis of Fort Bend County allocation. Likewise, when there were multiple ZIP code county pairs involving the same county, these were combined to obtain a single ZIP code county entry for analysis.

The raw SoVI indices for the 49 impacted counties were obtained from Dr. Christopher Emrich at the University of Central Florida, a leading expert in the development of the Social Vulnerability Index (SoVI). The Social Vulnerability Index (SoVI), was created by Cutter et al. (Cutter, S. L., Boruff, B. J., & Shirley, W. L. (2003). "Social vulnerability to environmental hazards," Social Science Quarterly, 84(2), 242–261). The index was created at the University of South Carolina. The idea behind social vulnerability, and its relevance in the context of the work presented here, is that social vulnerability arises from certain geographically identifiable population groups have limited access to political power and resources, have certain physical limitations, or are bound by customs, social capital, beliefs, and characteristics of the built environment (such as density and infrastructure type, building age and stock, etc.). The idea of social vulnerability is that it makes the socially vulnerable people (here, counties) more susceptible to and less resilient to a catastrophic event. More vulnerable groups are less likely to be able to respond and recover from such catastrophic events on their own should they occur. The index is useful to quantify, describe and understand the social burdens of a risk, such as a catastrophe.

The mathematical development of the original SoVI started by identifying those social characteristics consistently seen in the literature as contributing to social vulnerability. A literature review process was used by the inventors of SoVI to distill the universe of possible vulnerability measures down to a subset of variables including, wealth, proportion of elderly residents in a county, race, social status variables, Hispanic ethnicity, percent of residents without health insurance, persons with special needs, service industry employment, Native American population, and gender, etc.. These variables are entered into a statistical principal component factor analysis resulting in 11 components that explains 76.4% of the variance in social vulnerability relative to the original data set. The resultant SoVI index for a county is a linear combination of the factors derived. The latest SoVI index now uses 29 variables and synthesizes socioeconomic variables obtained from data sources primarily from the United States Census Bureau. A more extensive discussion and presentation of SoVI is given at http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-0.

For purposes of these analyses, a SoVI scale was needed to compare social vulnerability across affected Hurricane Harvey declared disaster areas (49 Counties). For the analysis in this allocation process the SoVI analysis utilized 48 impacted counties since Harris County was identified for individual funding separately from these analyses.

Again, Dr. Christopher Emrich completed the SoVI computations and supplied the SoVI scores for all of the 49 declared disaster counties. Dr. Emrich is the Boardman Endowed Associate Professor of Environmental Science and Public Administration and a member of the National Center for Integrated Coastal Research at the University of Central Florida.

For the purpose of utilizing the SoVI score as a part of the allocation process, an adjustment of the raw SoVI was needed to make it positive. This was accomplished for each county by subtracting the minimum raw SoVI value among all counties from the particular county SoVI value, and then adding one to the result. This makes all values greater than or equal to one.

Another factor used for the allocation decision was the ability of a county (or ZIP code) population to sustain and/or recover from the disaster by raising or utilizing their own funds. For this purpose the unmet need per capita was calculated. This method also accounts for the differences in population between rural and urban areas. For each county or ZIP code the unmet need per capita was calculated by dividing the unmet need amount (plus resiliency factor) developed by severity level by the population size.

The allocation of funds by county and ZIP code involved a weighted combination of the unmet needs per county (or ZIP code), the positive SoVI and the per capita unmet need for each county (or ZIP code). To facilitate this, a separate distribution percentage was determined for each of these three factors providing the distribution percentages that would be applicable were this factor the only factor in consideration. These factor distributions in turn were subsequently combined to present a single percentage allocation distribution across all counties (and ZIP codes when relevant).

The distributions for the 80% allocation and the 20% allocations were determined separately with the 80% group and the 20% group delineated by the Federal Register, minus Harris County and the City of Houston. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each county and ZIP code by taking the county or ZIP code's unmet need plus resiliency score and dividing it by the sum of the unmet need plus resiliency scores over all county and ZIP codes in the 80% allocation group.

Similarly, for the SoVI based distribution percentage of 1+(Raw SoVI - Min(Raw SoVI)), the 1+(Raw SoVI - Min(Raw SoVI)) value for the county was divided by the sum of the 1+(Raw SoVI - Min(Raw SoVI)) scores over all counties in the 80% allocation group which gives the distribution percentage for the positive SoVI scores. Likewise, for the distribution percentage based on unmet needs per capita, the county or ZIP code per capita unmet need plus resiliency for a county or ZIP code was divided by the sum of the unmet need per capita value across all counties and ZIP codes in the 80% allocation group. An analogous process was used for the 20% allocation group of counties only. This methodology determines the percent allocation to each county (or ZIP code) that would ensue were that factor to be the only factor in consideration. That is, the first unmet need factor, determines the percentage allocation distribution that would apply if unmet need were the only factor. The SoVI factor presents the percentage allocation distribution that would apply if social vulnerability of the distressed population were the only factor, etc.

These factor considerations are not viewed in isolation as the three need to be combined to produce a single number. Combining the unmet needs plus resiliency distribution, and the positive SoVI distribution, and the unmet need plus resiliency per capita distribution was achieved by using a 50-40-10 model that takes a weighted combination of the three distributions with 50% weight given to the unmet needs plus resiliency percentage distribution, 40% weight to the positive SoVI distribution, and 10% weight to the per capita unmet need plus resiliency distribution. This 50-40-10 weighting determines a funding allocation percentage for each county by using the Unmet need for the county, the SoVI index for the county, and the per capita unmet need for the county. A weighting of the three components: Unmet need, SoVI, and Per capita unmet need via the final percentage contribution weighting for each factor of 50%-40%-10% was used in previous disaster relief efforts. The dollar allocation amounts obtained using the 50-40-10 model without imposing any constraints on the amount of funding were calculated using the percentage distribution values for the county or ZIP code to the total dollar amount to be allocated (80% of the available funds in the 80% group and 20% of the funds in the 20% group).

The shortfall column displays the unmet need plus resiliency factor for a county or ZIP code versus the amount they would receive using the unconstrained 50-40-10 model dollar allocation. This column presents how much under or over their unmet need the county or ZIP codes is by using the unconstrained 50-40-10 weighting allocation process.

Practicality dictates that there be a minimum allocation amount for counties since it is costly to apply for funding and to create the policies, administrative procedures, and personnel to implement the processing and distribution of the HUD funds. This minimum allocation amount was set at $2,000,000 and applied to all allocation decisions in the State Homeowner Assistance Program spreadsheet and the 80% allocation group in the Local Buyout/Acquisition Program spreadsheet.

Over-allocating funds to a county far beyond their unmet needs is not reasonable, especially if other counties have not yet received their unmet need. Accordingly, a maximum allocation amount constraint is imposed with a cap being set at 200% of the unmet needs plus resiliency amount for the funding of counties. These two numbers (cap and floor) provide constraints on the funding a county or ZIP code can receive in a given allocation. If a county or ZIP code reached its maximum allocation, then any funds ascribed to them by the 50-40-10 rule above and beyond their maximum were available for reallocation and distribution to other counties or ZIP codes not having reached their maximum.

This reallocation process was performed in a sequential process of traunch allocations. In the 80% funding group there was enough funding for two traunches before all monies were fully allocated. As the spreadsheet shows, the majority of areas in the 80% allocation category did not reach their maximum in the first traunch allocation.

Regarding the second traunch process, as was done for the first traunch, an allocative percentage distribution had to be developed to apply to the amount available for distribution in order to direct the fund allocation. Here, however, zero percent additional allocation was given to those entities (counties or ZIP codes) that had already obtained their maximum allocation according to the formula To achieve this second traunch allocation, the original 50-40-10 distribution probabilities for the counties that had not yet reached their maximum were renormalized to create a an allocative percentage distribution for second traunch funding. This was done by dividing the original percentages by the sum of the percentages of the areas remaining below their cap, with the goal of

allocating 100% of unmet need in the second traunch if possible. That was accomplished for the 80% group as described above.

Because funding was allocated to both counties and ZIP codes in the 80% allocation subgroup, and because all ZIP codes overlap with either an 80% allocation county or a 20% allocation county, care had to be taken to avoid the structural issue of double allocation (double counting) due to this overlap. The overlap had to be subtracted out from the county to avoid over counting.

This process involved using the actual damage data by ZIP code and breaking the data into ZIP code county pairs. The population count total for the county was also adjusted to remove population of the county that had already been counted in the ZIP code population. This process eliminated double counting when there was overlap in county and ZIP data. This process was used for all overlaps. The same process was used to remove the effect of overlap of ZIP code allocation and county allocation in the 20% not most heavily impacted allocation subgroup.

Since the city of Houston will receive a separate allocation, it was necessary to delete the overlaps of the city of Houston counts from any counties or ZIP codes with which it overlaps. Using detailed FEMA verified loss data from the FEMA data set of counts of damage severity levels by homeowners and renters, it was possible to identify and extract the totals for the city of Houston homeowners and renters for all three severity levels. These numbers were then used to exclude city of Houston data from being counted in any other entity being allocated funds, just as previously described for overlapping counties and ZIP codes. Population counts and unmet need amounts already corresponding to Houston residences were removed from the Fort Bend data set.

20% State Homeowner Assistance Program and Local Buyout/Acquisition Program Allocation Group Required by HUD in the Federal Register of February 9, 2018

The process for the 20% State Homeowner Assistance Program and Local Buyout/Acquisition Program allocation counties was the same as described for the 80% allocation counties for both the State Homeowner Assistance Program and Local Buyout/Acquisition Program 80% groups. Namely a minimum allocation amount was determined and after that, residual funds were allocated in traunches with maximum allocations imposed at each traunch.

The minimum allocation amount for the 20% Local Buyout/Acquisition required a reasonable determination for that group separately as there was not enough money available to give all 33 counties a minimum of $2,000,000. This was accomplished by using a buildup approach that incorporated necessary administration costs for a buyout, unmet needs for the most impacted county, and the likely buyout percentage of houses in the most impacted county for the 20% Local Buyout/Acquisition group.

Known administrative costs are that program (2%) and project (10%) administrative costs equal 12% of the money in a buyout grant award (total grant award). The county with the largest unmet need in this group is Waller County with $19,548,797 of unmet need. Waller County also has the largest number of damaged residences (177 total) and the largest total number of properties in the Major-High and Severe Damage categories (105 total). Properties in the Major-High and Severe Damage categories are the most likely to be bought out, with 105/177 =59% of damaged houses in the most damaged county (Waller) being likely to be bought out. These data served as a reasonable and equitable methodology to calculate the minimum allocation dollars. Multiplying 12% administrative costs by this unmet need results in .12 x .59 x $19,548,797 = $1,384,055 minimum for each county.

There were eight counties in the State Homeowner Assistance Program and Local Buyout/Acquisition Program 20% allocation groups that received the minimum distribution in the first traunch. These were counties that did not receive a FEMA IA county declaration and did not meet the minimum threshold. However, these counties received a FEMA PA declaration making them eligible for CDBG-DR funds.

Thus, for the 20% Local Buyout/Acquisition Program group, the first traunch allocated the minimum to the 33 counties, and this sum ($45,673,815) was subtracted from the amount available for allocation in the 20% group buyout funding process. This residual amount after minimally funding all counties was then fully allocated using two more traunches after imposing a maximum allocation constraint of 200% of unmet need plus resiliency to all counties. When monies ran out with the second traunch, four counties had reached their 200% of unmet need maximum.

Allocation of State Homeowner Assistance Program Funds Designated in Action Plan Amendment 2

No changes to the initial allocation of State Homeowner Assistance Program funds to regional COGs was made for the purpose of Amendment 2. However, due to the change in designation of several geographic areas from State Most Impacted and Distressed to HUD Most Impacted and Distressed discussed in the HUD memorandum regarding methodology for funding allocation under Public Law 115-123 dated April 10, 2018, the initial allocation to areas re-classified as HUD Most Impacted and Distressed was moved to the appropriate funding category. The total dollar allocation to those specific areas did not change and thus the amount allocated to the COGs did not change.

In order to allocate the $236,210,909 in additional State Homeowner Assistance funds designated in Amendment 2 of the State Action Plan, the following updates were mad to the HAP allocation model:

- Re-classified four counties and four zip codes as HUD Most Impacted and Distressed rather than State Most Impacted and Distressed in accordance with Federal Register/Vol. 83 No. 157 / Tuesday, August 14, 2018 / Notices;
- Updated need multipliers in accordance and associated percentage adjustments with HUD's updated values provided in memorandum dated April 10, 2018 regarding "Methodology for Funding Allocation Under Public Law 115-123" (resulting in percentage adjustment of 55.6% for the Major-Low Damage Severity category, 74.4% for the Major-High Damage Severity category, and 100% for the Severe Damage category);
- Updated Federal Emergency Management Agency (FEMA) Individual Assistance (IA) data (from February 2, 2018 to June 25, 2018);
- Updated U.S. Census data, including population and median housing value estimates (from July 1, 2016 to July 1, 2017);
- Applied the maximum allocation constraint to counties and zip codes of two times their unmet need calculation based on the total allocation from the initial allocation of $1,048,011,316 in funds and $236,210,909 in additional funds. Therefore, many State Most Impacted and Distressed counties and zip codes did not receive additional funds in Amendment 2.

Funds that could not be distributed to State Most Impacted and Distressed areas due to the maximum allocation being reached by all entities were reallocated and distributed to HUD Most Impacted and Distressed areas, resulting in greater than 80 percent of total program funds going to HUD Most Impacted and Distressed areas.

B. Local Infrastructure Program Allocation

1) The list of the HUD Most Impacted Counties and ZIP Codes comes from the Federal Register, Federal Register / Vol. 83, No. 28 / Friday, February 9, 2018 / Notices, Table 1.

2) Data on 2016 population by county population comes County populations were obtained from the U.S. Census 2016 American Community Survey and other updated information [57].

3) The data set for the projected PA cost was supplied by FEMA Public Assistance (PA) Cost as of 2/1/2018.
4) The split of 80% to HUD identified most impacted and distresses counties and 20% to remaining impacted and distressed counties including most impacted ZIP codes is specified in Federal Register / Vol. 83, No. 28 / Friday, February 9, 2018 / Notices.

5) Harris County has been omitted from the allocation as it will receive funds directly from the State. Harris County PA Infrastructure claims represented over 93% of the total claims for all 49 counties. The amount of HUD funds to be distributed to the 48 remaining counties is $413,431,338 with 80% going to HUD determined most impacted and distresses counties ($330,745,070.40) and 20% to the impacted counties and most impacted ZIP codes ($82,686,267.60).
6) Unmet need was calculated using a 10% county matching requirement on total project costs.
7) A resiliency factor was calculated as 15% of total project costs. The resiliency factor represents the enhancements, improvements, or other components integrated into a structure to increase its capacity to respond to, or recover from, a disaster more quickly that if these components had not been integrated.
8) The component [1+ Raw SoVI - Min Raw SoVI]: was calculated based on raw Social Vulnerability Index (SoVI) scores at the county level. The raw SoVI is made positive by adding one (1) to each county's raw SoVI minus the minimum raw SoVI score of each of the 49 counties. The raw SoVI scores for the 49 counties were provided by Dr. Christopher Emrich of the University of Central Florida, National Center for Integrated Coastal Research, and communicated on February 19, 2018. The raw SoVI indices for the 49 impacted counties were obtained from Dr. Christopher Emrich at the University of Central Florida, an expert in the Social Vulnerability Index (SoVI) development. The Social Vulnerability Index (SoVI), was created by Cutter et al.(Cutter, S. L.,Boruff, B. J., & Shirley, W. L. (2003).”Social vulnerability to environmental hazards,” *Social Science Quarterly*, 84(2), 242–261). The index was created at the University of South Carolina. The idea behind social vulnerability, and its relevance in the context of the work presented here, is that social vulnerability arises from certain geographically identifiable population groups having limited access to political power and resources, having certain physical limitations, or being bound by customs, social capital, beliefs, and characteristics of the built environment (such as density and infrastructure type, building age and stock, etc.).

[57] https://www.census.gov/search-results.html?page=1&stateGeo=&searchtype=web&cssp=&q=texas+counties+population&search.x=0&search.y=0&search=submit

The idea of social vulnerability is that it makes the socially vulnerable people more susceptible to, and less resilient to a catastrophic event. More vulnerable groups are less likely to be able to respond and recover from such catastrophic events on their own should they occur. The index is useful to quantify, describe, and understand the social burdens of a risk, such as a catastrophe.

The mathematical development of SoVI starts by identifying those social characteristics consistently seen in the literature as contributing to social vulnerability. A literature review process was used by the inventors of SoVI to distill the universe of possible vulnerability measures down to 27 variables. These 27 variables (including, wealth; proportion of elderly residents in a county, race, social status variables, Hispanic ethnicity, percent of residents without health insurance, persons with special needs, service industry employment, Native American population, and gender, etc.) are entered into a statistical principal component factor analysis resulting in 11 components that explain 76.4% of the variance in social vulnerability relative to the original data set. The resultant SoVI index for a county is a linear combination of the factors derived. The SoVI index and its synthesized socioeconomic variables are obtained from data sources primarily from the United States Census Bureau. A more extensive discussion and presentation of SoVI is given at**:** http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-0**.**

For purposes of this analysis, a SoVI scale was needed to compare social vulnerability across affected Hurricane Harvey declared disaster areas (49 Counties). Dr. Christopher Emrich was recommended by Dr. Susan Cutter, one of the originators of this vulnerability index. Dr. Emrich is the Boardman Endowed Associate Professor of Environmental Science and Public Administration and a member of the National Center for Integrated Coastal Research at the University of Central Florida. Dr. Emrich completed the computations and supplied the SoVI scores for all of the 49 declared disaster counties. Since Harris County is receiving separate funding from the State, it has been excluded from the PA Infrastructure Allocation table but the SoVI scores for the other 48 counties would remain unchanged. According to Dr. Emrich, the SoVI model requires 100 input minimums and were run against the 49 declared disaster counties. Removing Harris county would not change the SoVI scores in the other remaining counties.

9) Another factor used for the allocation decision was the ability of a county population to sustain and/or recover from the disaster by raising or utilizing their own funds. For this purpose, the unmet need per capita was calculated. This method also accounts for the differences in population between rural and urban areas. For each county the unmet need per capita was calculated by dividing the unmet need amount by the population size.

10) The allocation of funds involved a weighted combination of the unmet needs per county, the positive SoVI and the per capita unmet need for each county. To facilitate this a separate distribution percentage was determined for each of these three factors which were subsequently combined for a single distribution across all counties. The distributions for the 80% allocation (HUD Most Impacted Counties) and the 20% allocations (Impacted Counties and Most Impacted ZIP Codes were determined through the guidance provided by the Federal Register. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each county by taking the county unmet need plus resiliency and dividing it by the sum of the unmet need plus resiliency over all county in the 80% allocation group. Similarly, for the SoVI based distribution percentage of 1+(Raw SoVI - Min(Raw SoVI)), the 1+(Raw SoVI - Min(Raw SoVI)) value for the county was divided by the sum of the 1+(Raw SoVI - Min(Raw SoVI)) values over all counties in the 80% allocation group which

gives the distribution percentage for the positive SoVI scores. Likewise, for the distribution percentage based on unmet needs per capita, the county per capita unmet need plus resiliency for a county was divided by the sum of the unmet need per capita value across all counties in the 80% allocation group (HUD Most Impacted Counties). An analogous process was used for the 20% allocation group (Impacted Counties and Most Impacted ZIP Codes).

Concatenation of the unmet needs plus resiliency distribution, and the positive SoVI distribution, and the unmet need plus resiliency per capita distribution was achieved by using a 50-40-10 model that takes a weighted combination of the three distributions with 50% weight given to the unmet needs plus resiliency percentage distribution, 40% weight to the positive SoVI distribution, and 10% weight to the per capita unmet need plus resiliency distribution. This 50-40-10 weighting determines a funding allocation percentage for each county by using: Unmet need plus resiliency in the county, the SoVI index for the county, and the unmet used per capita for the county.

11) The dollar allocation amounts using the 50-40-10 model without imposing any constraints on the amount of HUD funding were obtained by applying the percentage distribution values to the county to the total dollar amount to be allocated (80% of the available funds in the 80% group (HUD Most Impacted Counties) and 20% of the funds in the 20% group (Impacted Counties and Most Impacted ZIP Codes).

The shortfall (or surplus) displays the unmet needs plus resiliency versus the amount they would receive using the unconstrained 50-40-10 model dollar allocation. This presents how much under or over their unmet need the county are by using an unconstrained 50-40-10 weighting allocation process, as described previously.

Practicality dictates that there be a minimum allocation amount for counties since it is costly to apply for funding and to create the policies, procedures, and personnel to implement the processing and distribution of the HUD funds. This minimum allocation amount was set at $510,000 and applied to all allocation decisions. Likewise, over-allocating funds to a county far beyond their unmet needs is not reasonable, especially if other counties have not yet received even their unmet need. Accordingly, if all counties in the group have not yet received their unmet need allocation amount, then a maximum allocation amount constraint is imposed with a cap being set at 200% of the unmet needs plus resiliency amount for the funding of counties. These two numbers (cap and floor) provide constraints on the funding a county can receive in a given allocation. If a county reached the higher of the minimum distribution or the maximum allocation, then any funds ascribed to them by the 50-40-10 rule above and beyond their maximum were available for reallocation and distribution to other counties. This reallocation process was performed in a sequential process of traunch allocations. In the 80% funding group of most impacted counties, all counties had unmet needs above the minimum. However, there were only enough funds for two traunches before all monies were fully allocated and with some counties not receiving their maximum allocation before funds were exhausted. As the spreadsheet shows, only 4 counties of the 15 counties in the 80% allocation category reached their maximum 200% of unmet need and 3 counties did not receive 100% of their unmet need before funds ran out in the second traunch. In the 20% group of impacted counties and most impacted ZIP codes, all counties received at least the maximum distribution of 200% of unmet need plus resiliency. To fully disburse all of the funds allocated by HUD to this 20% group, the minimum allocation was set at $510,000. Some of the counties receiving the minimum distribution exceed 200% of their unmet need and are generally the counties with lower unmet

needs but high social vulnerability. Due to rounding, $208.17 of excess funds after the second traunch was allocated to the highest unmet need in the 20% group and was the last county to reach the maximum distribution at the end of the second traunch.

Regarding the second and third traunch processes, the percentage distribution had to be developed for the fund allocation, as was done for the first traunch. To do this, the original 50-40-10 distribution percentages for the counties that had not yet reached their maximum were renormalized to create a percentage distribution for second and third traunch fundings. This was done by dividing the original percentages by the sum of the percentages of the areas remaining below their cap with the goal of allocating 100% of unmet need in the second traunch if possible and distributing up to the maximum allocation or the remainder of the funds by the third traunch. For the 80% group, all allocated funds were disbursed by the second traunch. For the 20% group, all funds were disbursed by the third traunch.

13.1. Appendix G: City of Houston and Harris County Allocations – Action Plan

	City of Houston	Harris County	State of Texas
HUD Unmet Need Amount	$1,240,915,000	$1,242,557,000	$2,598,543,000
Less Public Law 115-31 Allocation ($57.8 Million)	$0	($43,465,600)	($14,334,400)
Public Law 115-56 Allocation ($5.024 Billion)	$1,240,915,000	$1,199,091,400	$ 2,584,208,600
Public Law 115-123 Allocation ($652,175,000)	$94,357,700	$94,009,847	$463,807,453
Less Economic Revitalization Program	($25,000,000)	($25,000,000)	$50,000,000
Allocation Adjustment to Account for Economic Revitalization	$1,310,272,700	$1,268,101,247	$3,098,016,053
Less Administration (5%)	($65,513,635)	($63,405,062)	($154,900,803)
Allocated APA 3 Program Amounts	$1,244,759,065	$1,204,696,185	$2,943,115,250
Add APA 3 State Administration &, Harris County & City of Houston Administration (2.5%)*	$31,118,976	$30,117,405	$222,583,119
APA 3 Total Allocations	$1,275,878,041	$1,234,813,590	$3,165,698,369
APA 7 Allocation Adjustment to Account for Reallocation of Harris County and City of Houston Funds	($1,275,878,041)	($338,744,472)	$1,614,622,513
APA 8 Allocation Adjustment to account for Reallocation of Harris County Funds, and Reimplementation of City of Houston Programs	$835,087,843	$21,265,866	($856,353,709)
APA 11 Allocation Adjustment to account for Reallocation of City of Houston Programs	($140,930,253)	$0	$140,930,253
APA 12 Allocation Adjustment to account for Reallocation of Harris County and City of Houston Programs	($30,000,000)	($30,000,000)	$60,000,000
APA 18 Allocation Adjustment to account for reallocation of City of Houston funds to State-Run HAP	($12,523,137.63)	$0	$12,523,137.63
Allocation Amount	**$651,634,452.37**	**$887,334,984**	**$4,137,420,563.63**

**Administration amounts have been adjusted for City of Houston, Harris County, and the State based on City and County Programs. The City of Houston and Harris County initially received 2.5 percent of their total program amounts for associated administrative costs. The 2.5 percent administration amounts for the City and County Programs were taken from the State's 5 percent previously budgeted for total Administration.*

Within HUD's Disaster Recovery Grant Reporting (DRGR) system Action Plan, the GLO will determine which programs and costs are drawndown from each respective allocation/grant irrespective of which programs received additional funding as part of APA2.

14.1. Appendix H: Public Comment – State of Texas

State of Texas Plan for Disaster Recovery: Amendment 18

Amendment 18 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on June 12, 2025, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran from June 12 to July 14, 2025. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

No comments were received during the public comment period.

List of those that submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
N/A	N/A	N/A

State of Texas Plan for Disaster Recovery: Amendment 16

Amendment 16 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on September 3, 2024, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran from September 3 to October 4, 2024. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

Forty-three comments regarding the DRRP in general were received. Three comments exclusively relating to Amendment 16 were received. In response to the comments, permanently affixed emergency communications equipment was added as an eligible activity for the DRRP and the maximum number of DRRP submissions was increased from two to three.

List of those that submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
Armstrong	DeWayne	City of Pineland
Thomas	David	Lufkin Police Department
Weems	Scott	City of Nacogdoches
Sprayberry	Sherry	Polk County Sheriff's Office
Stutts	Angela	City of Onalaska
Smith	Clayton	Crockett Police Department
Mohler	Josh	City of Livingston Fire Department
Frizzell	Jason	Crockett Fire Department
Blalock	Thomas	Zavalla Volunteer Fire Department
Edwards	Troy	Fuller Springs Volunteer Fire Department
Cochran	Dennis	Central Volunteer Fire Department
Wolfe	Mike	Huntington VFD
Lovell	Brandan	Huntington Police Department
Williams	Andrew	Center Police Department
King	Ricky	Center Police Department
Albers	Jim	Center Police Department
Monzingo	Tim	Nacogdoches County Sheriff's Office
McMulley	Michael	Woodville Police Department
Claude	Mike	DETCOG
Eldridge	Emmitt	San Jacinto County OEM
Moehlmann	Chris	South Polk County Volunteer Fire Department
Nehring	Chad	City of Center

Name		Individual, County, City or Organization
Last	**First**	
Garcia	Angela	American Conservation Foundation, Inc.
Austin	Carolina	Natural Resources Solutions, LC
Beaty	Sidney	Texas Housers
Sloan	Maddie	Texas Appleseed

The following is a summary of the comments received as well as the response.

General DRRP Comments

Comment Received: All action plan amendments should include the purchase and installation of public safety radio equipment and dispatch centers as an eligible use of DRRP funds. Although HUD does not allow the use of CDBG funds to purchase handheld public safety radios, the GLO should request a waiver regarding this prohibition. *(Similar comment received 22 times)*

Response: Thank you for your comment. Permanently affixed emergency communications equipment has been added as an eligible activity to the DRRP. However, due to the limited expenditure deadline for these funds, there will not be sufficient time to request and receive a waiver from HUD to add handheld public safety radios to the list of eligible activities.

Comment Received: DETCOG should be allowed to submit a regional application to address public safety communication needs related to radio equipment purchases and installation.

Response: A regional application would be problematic due to the selection criteria and single-project constraints under the DRRP, which is necessary to ensure all program funds are utilized in compliance with expenditure timelines.

Comment Received: Is the applicable LMI going to be from where individuals and families fell during the hurricanes or is their current LMI level today?

Response: The most recently available LMI data will be used for the DRRP eligibility considerations.

Comment Received: Please clarify whether counties included under the 2011 Wildfire Presidential Declaration but not under any of the other 2008-2019 declarations be eligible to apply.

Response: The DRRP does not add additional eligible areas to any of the six action plans. If a county received a disaster declaration for the 2011 Wildfires but is not included in any of the disaster areas eligible for the DRRP, it would not be eligible to receive these funds.

Comment Received: Please clarify whether DRRP-eligible counties included under the 2011 Wildfire presidential declaration receive credit for this declaration under the "Number of CDBGDR Eligible Presidential Declarations from 2008 to 2019" criterion.

Response: The presidential declaration from the 2011 Wildfires would be included in the scoring criteria.

Comment Received: Please clarify whether Bastrop County, the only "HUD Most Impacted and Distressed" area under the 2011 Wildfire grant (77 FR 22584 4/16/21), will receive 10 points under the HUD MID scoring criterion.

Response: The HUD Most Impacted and Distressed scoring criteria is applicable to each individual action plan. The 2011 Wildfires action plan will not be amended to include a DRRP, meaning that counties that were exclusively HUD MID for the 2011 Wildfires will not receive any points for this scoring criterion.D

Comment Received: Please clarify whether funds contributed from each CDBG-DR grant will only be available to projects that serve MID areas associated with that grant.

Response: The DRRP funds in each of the six individual action plans are available to all entities that are eligible under the respective action plan.

Comment Received: Please clarify if any level of FEMA assistance eligibility will provide a credit toward the points earned for the "Number of CDBG-DR Eligible Presidential Declarations" criterion.

Response: Only disasters for which Federal Major Disaster Declarations and CDBG-DR Eligible Presidential Declarations issued will be factored into this criterion.

Comment Received: Developing Affirmatively Furthering Fair Housing (AFFH) reviews after projects are proposed works backwards to develop a fair housing narrative and justify project decisions after the fact. This plan amendment does not foster a use of funds that affirmatively furthers fair housing. *(Similar comment received two times)*

Response: AFFH reviews must be conducted by the applicant as a part of its project selection process and submitted to the GLO during the application phase of the program. The GLO will review applicants' compliance with AFFH requirements for each project submitted for funding consideration. The GLO remains committed to ensuring AFFH efforts are compliant with regulatory requirements.

Comment Received: The current eligible activities do not allow for single-family home repair. The eligible activities need to be updated to better reflect community needs and wants.

Response: Due to the limited nature of the funds and expenditure timeline, the DRRP is focused on infrastructure improvements and the rehabilitation, reconstruction, and new construction of affordable multifamily projects.

Comment Received: County-level Social Vulnerability Index (SoVI) does not provide enough detail and does not give an accurate picture of vulnerability in specific communities. Using a county-level measure erases the vulnerability of communities within these counties.

Response: The DRRP will be utilizing the Social Vulnerability Index ("SoVI"), a highly regarded metric that accounts for disproportionate impacts, as a scoring criterion. In order for DRRP scoring to remain consistent across all action plans, the GLO will evaluate SoVI scores at the county and

place levels. By utilizing SoVI's synthesis of 29 socioeconomic variables contributing to the reduction in a community's ability to prepare for, respond to, and recover from hazards, the GLO is able to discern a clearer picture of differential vulnerability across impacted areas. SoVI has been used in a variety of disaster-related action plans across the nation and has gained prominence in the disaster recovery and mitigation realm.

Comment Received: We support the goals GLO has laid out for the DRRP; to provide the opportunity for communities with outstanding unmet need to access de-obligated and unutilized CDBG-DR funds and to expedite the expenditure of those funds.

Response: The GLO appreciates this comment.

Comment Received: We appreciate the inclusion of scoring criteria like the Social Vulnerability Index (SVI), LMI National Objective, Number of CDBG-DR Eligible Presidential Declarations, and additional points for Public Housing Authorities that will help ensure these funds reach underserved communities with the most remaining unmet disaster recovery needs.

Response: The GLO appreciates this comment.

Comment Received: The amendment does not include detailed information on the Composite Disaster Index (CDI) and Social Vulnerability Index (SVI) scoring criteria.

Response: Additional details on the CDI and SoVI scoring criteria are provided in the DRRP Mapping Viewer, the DRRP Call for Projects Guide, and layer list description, which are available on the GLO's website.

Comment Received: We support GLO's inclusion of a Social Vulnerability Index (SVI) in the scoring criteria and agree that the SVI is a critical component of any distribution of public funding.

Response: The GLO appreciates this comment.

Comment Received: We note that GLO has not specified which SVI it is using or the geographic level of analysis.

Response: The DRRP will be utilizing the SoVI, which originated out of the University of South Carolina and was further developed through a partnership with the University of Central Florida. SoVI is a highly regarded metric that accounts for disproportionate impacts through an equity lens. In order for DRRP scoring to remain consistent across all action plans, SoVI scores will be evaluated at the county and place levels.

Comment Received: Peer-reviewed research on social vulnerability confirms there is a need for transparency in the methods used to determine vulnerability, on the selection of an appropriate vulnerability index, and on how to adapt the index when county-scale aggregation downplays areas of actual vulnerability. If a default index is to be used, most governments tend to use the Center for Disease Control's social vulnerability index (SVI) which is based on publicly accessible data, for public policy purposes, not the SoVI from U. South Carolina which is based on proprietary information and is often used for academic research. *(Similar comment received two times)*

Response: The SoVI, which originated out of the University of South Carolina and was further developed through a partnership with the University of Central Florida, is a highly regarded metric that accounts for disproportionate impacts. By utilizing SoVI, the GLO can discern a clearer picture of differential vulnerability across areas of impact. SoVI synthesizes 29 socioeconomic variables (see Table 3-8 under section 3.6 of this Amendment) that contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties and other geographies. SoVI has been used in a variety of disaster-related action plans across the nation and has gained prominence in the disaster recovery and mitigation realm. The Centers for Disease Control's SVI, on the other hand, refers to the resilience of communities when confronted by external stresses on human health. These two distinctions are further illustrated when recognizing that SoVI is utilized in FEMA's National Risk Index while SVI is being used in the National Environmental Public Health Tracking Network.

Comment Received: We support the use of DRRP funds on flood and drainage improvements and water and wastewater improvements.

Response: The GLO appreciates this comment.

Comment Received: Although street improvements could further the objectives of CDBG-DR, the Amendment 7 language on street-related eligible activities is overly broad. Street improvements projects should only be funded if they make street infrastructure more resilient to flooding.

Response: All projects funded under the DRRP will be required to address unmet needs from the applicable disaster in accordance with eligible activity parameters outlined in each action plan and tie back to the disaster event.

Comment Received: For the provision related to affordable multifamily units, we urge GLO to add scoring criteria incentivizing making more than 51% of units affordable to the lowest-income Texans and increasing the number of units accessible to people with disabilities. As a recent report from the State Comptroller indicated, increasing the supply of housing, particularly for low-income Texans, is a crucial step towards solving the housing affordability crisis.

Response: All affordable multifamily housing projects funded by the DRRP must comply with applicable Housing Guidelines, available on the GLO's website.

Comment Received: We are not confident that the intended use of the money, to address the unmet need of the communities affected directly by the storms, will be awarded in a manner that appropriately addresses storm needs. As community members with experience living through countless disasters, of which Houston is a beneficiary of five out of six of these annual declarations, our unmet need should be the most considered in the actions of the GLO.

Response: All projects funded under the DRRP will be required to address unmet needs from the applicable disaster and tie back to the disaster event.

Comment Received: We are concerned that there is not enough information given to the public in these amendments to submit an appropriate public comment. *(Similar comment received two times)*

Response: The GLO drafts action plans and amendments in accordance with regulatory requirements and published HUD guidance.

Comment Received: This amendment does not explicitly state that the funds must be used in direct tieback to the storm, like other Amendments clearly state.

Response: As stated in the DRRP eligibility criteria in each action plan amendment, each project must "[a]ddress unmet needs from applicable disasters and tie back to the disaster event".

Comment Received: We are extremely concerned with the lack of consideration for Affirmatively Furthering Fair Housing regulations and lack of clarity on how the GLO expect to ensure fair housing and discourage discrimination, in light of the current discriminatory finding that is still unsettled against the GLO for a similar competition administered with the CDBG-Mitigation funds.

Response: AFFH reviews must be conducted by the applicant as a part of the process for project selection and submitted to the GLO during the application phase of the project. The GLO will review applicants' compliance with AFFH requirements for each project submitted for funding consideration. The GLO remains committed to ensuring AFFH efforts are compliant with regulatory requirements.

Comment Received: We implore the GLO to withdraw all six amendments that are attempting to create a DRRP in order to move money away from the original intended beneficiaries. Houston was impacted in five of the six funding allocations. And Houston continues to be devastated by disasters. It is unclear why GLO would be moving funding away from the programs they should be completing as those were the most important unmet needs that this money was intended to address. *(Similar comment received two times)*

Response: The DRRP is designed to utilize funds that have been unutilized and deobligated from other programs to ensure that all grant funds are expended. Communities will be eligible to apply for DRRP funds under any action plan in which they are identified as HUD and/or State MID areas.

Comment Received: We are also in disagreement that any money that is reallocated for any purpose be withheld from repairing, reconstructing, or rehabilitating single family homes for homeowners living in their primary residence.

Response: Due to the limited nature of the funds and expenditure timelines, the DRRPs are focused on limited infrastructure and affordable multifamily housing projects.

Comment Received: The Action Plan Amendments note that "each project will undergo eligibility analysis based on the grant that will be used to fund it," but fails to provide detail on how the DRRP will connect to specific grant priorities and requirements.

Response: The DRRP sections of each action plan amendment describe the requirements for use of the reallocated funds and state that selected projects must address unmet needs from the applicable disaster in accordance with eligible activity parameters outlined in the action plan and tie back to the disaster event.

Comment Received: The GLO also needs to clearly communicate and explain the decision to move funds to a new program. It is unclear why the Action Plan Amendments note that the

State of Texas "consistently has insufficient funding to fully recover from disasters" and yet funding is being reallocated. If programs and subrecipients do not fully utilize allocated funds, why can those funds not be reallocated within the existing Action Plan to address previously established priorities and needs? *(Similar comment received two times)*

Response: All reallocated funds are either funds that were not utilized in their original program or deobligated from closed contracts. The GLO has created the DRRPs to ensure that all remaining grant funds are expended within HUD established timelines.

Comment Received: If the DRRP is going to be an ongoing program using deobligated or unobligated funds, the GLO must spend more time seeking public input and developing meaningful criteria that reflect the needs of low-income Texans.

Response: All action plan amendments have been posted for the federally required amount of time according to respective Federal Register notices due to the limited expenditure timeline of the funds.

Comment Received: The Action Plan Amendments fail to provide evidence to demonstrate that the listed eligible activities are in line with priorities and needs of vulnerable communities who have faced historic discrimination.

Response: All proposed projects must address unmet needs from applicable disasters and tie back to the disaster event. Each project will undergo Affirmatively Furthering Fair Housing (AFFH) review by the applicants before GLO approval, as outlined in the DRRP requirements in the action plans.

Comment Received: Under the proposed Composite Disaster Index (CDI) selection criteria, will GLO use the 254-county-based CDI percentiles, or will it recalculate the percentiles based upon the number of DRRP-eligible counties? If the latter, we request this information be made available prior to finalizing the action plan amendments so that stakeholders can assess the impact on their ability to compete.

Response: The DRRP selection criteria will utilize the state-wide CDI. Additional information on all data used in this program can be found on the program website when the call for projects begins.

Comment Received: The proposed scoring criteria already have another item that measures compounding impacts of disasters - the count of presidential disaster declarations. If the GLO wants to continue to focus so many points on compounding impact and increased vulnerability, they should rework their criteria to more accurately reflect local risk that is relevant to the funding source. *(Similar comment received two times)*

Response: The DRRP selection criteria are focused on providing funds to areas that have been most frequently impacted by significant disasters. Utilizing CDI and the count of CDBG-DR eligible presidential disaster declarations in the criteria helps to ensure that reallocation funds are used to assist those who are regularly impacted by disasters.

Comment Received: We understand the desire to leverage existing funds, but we are concerned that the inclusion of points for providing at least 10% of the funds requested in the scoring criteria could disadvantage communities without access to other resources for disaster recovery. While the higher number of points for projects that meet the LMI National Objective may be intended to mitigate this effect, we are perhaps more concerned that smaller, less well-resourced, and less affluent communities will not have the capacity to submit project

applications in the first place. We urge GLO to conduct affirmative outreach to these communities and offer them technical assistance with grant applications. *(Similar comment received two times)*

Response: By including a leverage component in the selection criteria, the DRRP encourages submissions from entities that have the capacity and commitment to utilize funds in line with the expenditure timeline. The GLO will host a webinar to discuss the DRRP and provide written submission guides and FAQs to support communities.

Comment Received: We are confused about the inclusion of the CDI in the scoring criteria, particularly since a more relevant measure, "Number of CDBG-DR Eligible Presidential Declarations from 2008 to 2018" is also included.

Response: The DRRP selection criteria are focused on providing funds to areas that have been most frequently impacted by significant disasters. Utilizing CDI and the count of CDBG-DR eligible presidential disaster declarations in the criteria helps to ensure that reallocation funds are used to assist those who are regularly impacted by disasters.

Comment Received: Counties are ranked by the highest frequency per hazard, including wildfires, hail, and drought, that would not result in unmet needs eligible to be addressed with the CDBG-DR funding covered by the proposed Action Plan Amendments. Because the scores are weighted by the relative impact of each hazard on property loss and human casualties, wildfires, which GLO has specifically excluded from the DRRP, are weighted more heavily than flooding, which caused much of the damage these funds are intended to address.

Response: The CDI is designed to give a comprehensive description of the impact of all disasters. All DRRP projects will be required to address unmet needs related to the respective disaster events.

Comment Received: Normalizing the distribution twice also means that outliers, counties with the most severe risk for eligible hazards, are pulled towards the middle of the distribution, meaning that their relative risk for eligible hazards looks smaller than it actually is.

Response: The CDI is one component of the scoring criteria for the DRRP, worth 20 points.

Comment Received: The CDI uses data from the National Flood Insurance Program on properties that have flooded multiple times to calculate flood risk. This means that only houses that are insured and have filed flood insurance claims are counted towards flood risk: homeowners who can't afford flood insurance or live in areas without a community rating are excluded.

Response: The CDI methodology utilized in the DRRP selection criteria follows the methodology designed by the Center for Space Research at UT Austin. The CDI is one component of the scoring criteria for the DRRP, worth 20 points.

Comment Received: The CDI also does not account for the number of people and amount of property at risk from a given hazard. Ranking counties from 1 to 5 instead of using absolute numbers distorts the magnitude of difference between counties.

Response: The CDI is one component of the scoring criteria for the DRRP, worth 20 points. The ranking of eligible counties under each DRRP based on areas of impact allows for a more accurate weighting relative to each disaster event.

Comment Received: GLO should use the SVI at the census tract and not county level in order to ensure that CDBG-DR funds address unmet recovery needs in the most affected areas. Determining SVI score at the county level rather than at a lower geographic level means that areas with greater economic inequality will have lower SVI scores, even if there are areas within those counties with very high levels of social vulnerability. This may steer funds away from the hardest-hit areas that are most affected by pre-existing inequities and where recovery funds are still most needed.

Response: The GLO intends to use SoVI analyses at county and place levels to allow the DRRP scores to be consistent across action plans.

Comment Received: The total number project submissions should be increased from two.

Response: Thank you for your comment. The maximum number of project submissions per applicant has been increased to three.

Comment Received: The public should have an opportunity to know and comment on which specific requirements of an Action Plan are being superseded. While the public may have some sense of this from the current amendments which detail specific programs from and to which funds are being reallocated, the inclusion of language in the Harvey, 2018 Floods, and 2019 Disasters amendments in specific program sections stating that "any remaining funds within this program will be reallocated to the DRRP" suggests that the public may not have an opportunity to comment on future reallocations to the DRRP.

Response: The GLO will follow requirements for posting future substantial action plan amendments for public comment as required for each grant.

Comment Received: [I]t is critical that the scoring criteria and eligible activities for the DRRP are developed through deliberate and genuine public engagement and are targeted to the low- and moderate-income Texans that are the intended beneficiaries of these funds.

Response: The LMI criterion is 20% of the total points award for the DRRP in order the emphasize it as a National Objective. The GLO will follow requirements for posting future substantial action plan amendments for public comment as required for each grant.

Comment Received: We would like to emphasize the importance of ensuring that unexpended funds from disaster recovery efforts are reallocated for use within the broader affected regions, particularly in areas that share the same watershed or ecological systems as those originally impacted. By allowing unexpended funds to be reallocated and utilized in counties outside the original disaster declaration areas, we can address the broader environmental and community recovery needs, ensuring a more resilient restoration of these vital ecosystems.

Response: HUD does not allow the GLO to make any additional areas eligible under the DRRPs for any of the six action plans.

Harvey 5.6B Specific Comments

Comment Received: We are concerned with described buyout programs and reallocations in the Hurricane Harvey amendment. [W]e have seen significant issues with the Harris County Residential Buyout program and would like to see those issues resolved before additional funds are reallocated to the program.

Response: Harris County continues to work to assist families in the Disaster Risk Reduction Areas and is actively addressing challenges in its buyout program. Additional time has been granted to the county to allow it to relocate families through its Single Family New Construction Program.

Comment Received: We are also concerned about the shift of a large amount of funding within the Hurricane Harvey Action Plan Amendment from the Houston Single Family Development program to the Houston Buyout program. Given the issues that we have seen with the Harris County buyout program, we want to ensure that this large increase in funding does not result in greater distress and harm for those impacted by Hurricane Harvey.

Response: The GLO has partnered with the City of Houston to deliver through the city's Buyout Program relocation benefits to impacted families. To assist in this effort, the GLO has procured a vendor to help ensure that beneficiaries of the program are provided, as applicable, with uniform, fair, and equitable treatment compliant with Uniform Relocation Act (URA) requirements.

Comment Received: Before additional funding is reallocated to the City of Houston multifamily buyout program, we request information about how the state will ensure that the same issues do not reoccur and that tenants receive not only the URA benefits they are entitled to by law but any additional relocation assistance they need to ensure that are able to relocate to safe, decent, and affordable housing in a neighborhood of their choice less vulnerable to flooding.

Response: The GLO has procured a vendor to help ensure that impacted families in the City of Houston's Buyout Program are provided, as applicable, with uniform, fair, and equitable treatment in compliance with the URA.

Amendment 12 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on May 22, 2023, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran from May 22 to June 21, 2023. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those that submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
Sloan	Maddison	Texas Appleseed
Orduña	Julia	Texas Housers

The following is a summary of the comments received as well as the response.

Comment: Amendment 12 creates the Harris County Flood Control District Program and states that "[a]t least 50 percent of these program funds must be spent on LMI eligible projects". Because at least 70% of CDBG-DR funds for Hurricane Harvey must be spent on LMI eligible projects, we request that the state clarify how it calculated that only 50% of HCFCD Program projects must meet the LMI national objective.

Response: The GLO is committed to distributing CDBG-DR funding to accomplish the national objective of assisting Low- and Moderate-Income level (LMI) households in accordance with HUD's requirements in the February 9, 2018 Federal Register notice. The GLO will ensure that at least 70 percent of aggregate program funds provided to the state of Texas will be used to benefit LMI households. Please see *Table 55: Total LMI Budget* on page 147 of this APA 12 to see how the GLO calculates its compliance with the LMI requirement. Estimated projected funding benefitting LMI persons as of the issuance of APA 12 is $3,983,642,947, or 77%, of CDBG-DR funding provided to the state of Texas for Hurricane Harvey disaster recovery which is 7% more than required by HUD.

Comment: While we appreciate that this funding is remaining in Harris County we are very concerned that $322 million in housing funds are being reallocated in one of the hardest hit areas of the state. More than 150,000 homes in Harris County were flooded, along with 5,000 to 10,000 apartments, condos, and townhouses. Over 12,000 homes were flooded in the Greens Bayou Watershed alone, which includes neighborhoods like Greenspoint and East Houston that are predominantly low- and moderate income (LMI) and Black and Latinx. However, there were only 2,594 applications for the GLO-administered Homeowner Assistance Program, 400 of those applications have been approved, are under construction, or finished construction, and 139 applications are in the eligibility process. We were unable to find comparable reporting on the Harris County and City of Houston administered home rebuilding and rehabilitation programs, so we understand these numbers may be higher but these are much lower numbers, comparatively, of both applications and home repairs and reconstructions, than other areas of the state with high levels of damage but much smaller populations, including Coastal Bend, HGAC-East, and Southeast Texas. No other region has had unused housing funds that were

reallocated by the state. GLO should provide a more detailed explanation of why these funds were not used to rebuild housing to support the proposed reallocation of CDBG-DR funds.

Response: Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

With the transfer of these programs to the GLO, extensive efforts were made to assist those persons affected in Houston and Harris County who were not previously served. Survey and application files from the City of Houston and Harris County administered housing programs were transferred to the State-run City of Houston HAP and State-run Harris County HAP upon the passage of APA 7. Once received, the GLO immediately began contacting those transferred participants to determine their status and the disaster assistance that could be provided.

The delay in assistance to homeowners under the City of Houston and Harris County administered programs resulted in the eventual closure of a high number of the case files transferred from both city and county programs to the State-run programs due to applicants being unresponsive, voluntarily withdrawing their applications, or having already received disaster recovery assistance from another assistance program. Participants were contacted a minimum of three times by the GLO before being deemed non-responsive.

During COVID and since, to increase application numbers, the GLO initiated an aggressive city and county outreach campaign to solicit new applicants. This outreach campaign included social media postings, postcard mailings, emails, text messages, door-to-door canvassing, public relations efforts, and engagement with local community organizations. In September 2022, the GLO began a re-engagement outreach effort to contact applicants who previously had incomplete applications and/or had been non-responsive. These applicants were allowed opportunities to submit complete applications and address outstanding eligibility items that originally resulted in closed applications.

In addition to providing substantial community outreach, the GLO provided a lengthy application period to City of Houston and Harris County applicants; the application period for Houston/Harris Counties applicants was open for three years from May 2020/July 2020 to June 30, 2023.

While these outreach efforts and lengthy application period have ensured that the GLO has engaged as many affected homeowners in the City of Houston and Harris County as possible. The GLO remains committed to helping those adversely affected by Hurricane Harvey and will continue working to serve all remaining eligible program participants.

Comment Received: The number of low- and moderate-income households assisted with housing recovery post-Hurricane Harvey in Houston and Harris County is far below the numbers that should have been served based on the number of applications received. Despite the fact that Houston and Harris County suffered the most severe impacts from Hurricane Harvey, the rates of households receiving housing assistance are dramatically lower than households in other regions of the state. As shown below, the rates of GLO rejection of applicants and/or closing of applications without providing assistance is significantly greater in Harris County than any other region of Texas. In Amendment 12, the GLO fails to provide any data or analysis disclosing or explaining these disturbing facts. At the least, this represents

a dramatic failure of local and state governments to competently administer housing assistance programs in Houston and Harris County and fundamentally undermines the GLO's assertion that no further housing assistance is needed. Even more troubling is that, given GLO's past practices of racial discrimination, Amendment 12 is a continuing part of GLO's discrimination against African-American and Hispanic survivors of Hurricane Harvey.

Response: Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

With the transfer of these programs to the GLO, extensive efforts were made to assist those persons affected in Houston and Harris County who were not previously served. Survey and application files from the City of Houston and Harris County administered housing programs were transferred to the State-run City of Houston HAP and State-run Harris County HAP upon the passage of APA 7. Once received, the GLO immediately began contacting those transferred participants to determine their status and the disaster assistance that could be provided.

The delay in assistance to homeowners under the City of Houston and Harris County administered programs resulted in the eventual closure of a high number of the case files transferred from both city and county programs to the State-run programs due to applicants being unresponsive, voluntarily withdrawing their applications, or having already received disaster recovery assistance from another assistance program. Participants were contacted a minimum of three times by the GLO before being deemed non-responsive.

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In addition to providing substantial community outreach, the GLO provided a lengthy application period to City of Houston and Harris County applicants; the application period for Houston/Harris Counties applicants was open for three years from May 2020/July 2020 to June 30, 2023.

While these outreach efforts and lengthy application period have ensured that the GLO has engaged as many affected homeowners in the City of Houston and Harris County as possible. The GLO remains committed to helping those adversely affected by Hurricane Harvey and will continue working to serve all remaining eligible program participants.

Comment Received: Without offering any supporting data, GLO justifies Amendment 12 on the unsupported assertion that there are no remaining unmet housing recovery needs in Houston/Harris County. Defunding housing assistance should not be carried out in the absence of supporting data. GLO has failed to make available adequate data to permit an assessment of the agency's performance in administering CDBG-DR funds for housing assistance.

Response: Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

With the transfer of these programs to the GLO, extensive efforts were made to assist those persons affected in Houston and Harris County who were not previously served. Survey and application files from the City of Houston and Harris County administered housing programs were transferred to the State-run City of Houston HAP and State-run Harris County HAP upon the passage of APA 7. Once received, the GLO immediately began contacting those transferred participants to determine their status and the disaster assistance that could be provided.

The delay in assistance to homeowners under the City of Houston and Harris County administered programs resulted in the eventual closure of a high number of the case files transferred from both city and county programs to the State-run programs due to applicants being unresponsive, voluntarily withdrawing their applications, or having already received disaster recovery assistance from another assistance program. Participants were contacted a minimum of three times by the GLO before being deemed non-responsive.

During COVID and since, to increase application numbers, the GLO initiated an aggressive city and county outreach campaign to solicit new applicants. This outreach campaign included social media postings, postcard mailings, emails, text messages, door-to-door canvassing, public relations efforts, and engagement with local community organizations. In September 2022, the GLO began a re-engagement outreach effort to contact applicants who previously had incomplete applications and/or had been non-responsive. These applicants were allowed opportunities to submit complete applications and address outstanding eligibility items that originally resulted in closed applications.

In addition to providing substantial community outreach, the GLO provided a lengthy application period to City of Houston and Harris County applicants; the application period for Houston/Harris Counties applicants was open for three years from May 2020/July 2020 to June 30, 2023.

While these outreach efforts and lengthy application period have ensured that the GLO has engaged as many affected homeowners in the City of Houston and Harris County as possible. The GLO remains committed to helping those adversely affected by Hurricane Harvey and will continue working to serve all remaining eligible program participants.

Comment Received: **According to the City of Houston's end of month transparency report, dated September 30, 2020, the City of Houston had 16,643 potential applicants for housing repair or rehabilitation in their intake system. Of those, 10,229 of those Houstonians had been initially screened for LMI status and qualification and invited to apply and 1,656 applicant intakes had been completed. There is no comparable data available for Harris County, but given the population and storm impact, it is reasonable to expect a similar number of likely qualified households to that within the city existed in the county. In other words, the Houston/Harris County application pool was likely in excess of 32,000 households. The proposal to terminate housing programs disproportionately impacts African Americans and Hispanics. According to a February 2023 GLO newsletter, as of January 25, 2023, over 89 percent of the applicants in the State-administered city of Houston program were African American or Hispanic. On October 8, 2020 GLO terminated the City's administration of the**

single-family housing program and GLO assumed operation of the program. According to the GLO's February Houston/Harris newsletter, as of January 25, 2023, the GLO had "744 completed homes, 201 homes under construction, and 655 approved for construction" in the city of Houston. If none of these numbers overlap or drop out, this totals exactly 1,600 homes that will be repaired or reconstructed. As of June 9, 2023, the GLO reported in unincorporated Harris County that it completed 300 homes, 22 are under construction, and 78 are approved for construction, totaling 400 homes. An additional 2,054 applications were closed or deemed inactive and terminated. If none of these numbers overlap or drop out, this totals exactly 2000 homes that will be repaired or reconstructed in Houston and Harris County when the program ends. This is only 6.25 percent of the estimate of applications received and screened.

Response: The referenced figures do not accurately reflect the number of eligible applicants for the City of Houston and Harris County administered homeowner assistance programs. The City of Houston performed a survey of potential applicants resulting in 16,647 results. Survey participants were then invited to apply under the City of Houston-administered Homeowner Assistance Program (HoAP). As a result of the city's lengthy delays in providing HoAP assistance, many survey participants submitted multiple survey entries. In addition to the duplicate entries, the pool of potential applicants contained many applicants applying for assistance other than housing rehabilitation and reconstruction.

Upon reallocating the City of Houston-administered HoAP funds to the State-run City of Houston HAP, the GLO received a total of 7,277 transferred case files from the city, of which 7,176 had not yet been processed by the city. The GLO also received a total 5,918 potential applicant files from Harris County. These individuals were contacted through multiple means of communication to facilitate a smooth transition to the State-run programs.

The delay in assistance to homeowners under the City of Houston and Harris County administered programs resulted in the eventual closure of a high number of case files transferred from both city and county programs to the State-run programs due to applicants being unresponsive, voluntarily withdrawing their applications, or having already received disaster recovery assistance from another assistance program. Participants were contacted a minimum of three times by the GLO before being deemed non-responsive.

To increase application numbers, the GLO initiated an aggressive city and county outreach campaign to solicit new applicants. This outreach campaign included social media postings, postcard mailings, emails, text messages, door-to-door canvassing, public relations efforts, and engagement with local community organizations. In September 2022, the GLO began a re-engagement outreach effort to contact applicants who previously had incomplete applications and/or had been non-responsive. These applicants were allowed opportunities to submit complete applications and address outstanding eligibility items that originally resulted in closed applications.

In addition to providing substantial community outreach, the GLO provided a lengthy application period to City of Houston and Harris County applicants; the application period for Houston/Harris Counties applicants was opened for three years from May 2020/July 2020 to June 30, 2023.

Through its efforts, the GLO directly contacted 16,655 individuals, resulting in 650 new applications in Harris County outside of Houston.

Comment Received: **As of June 9, 2023, the GLO reported receiving 2,593 applications from Harris County residents outside the City of Houston. An astounding 2,054 (79.2%) of the**

applications from county residents received no assistance and were classified "inactive/closed." We were unable to find data from the GLO concerning "inactive/closed" cases for residents living in the city of Houston, but we expect it to be similar to the extremely high rates experienced in the county.

Response: Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

With the transfer of these programs to the GLO, extensive efforts were made to assist those persons affected in Houston and Harris County who were not previously served. Survey and application files from the City of Houston and Harris County administered housing programs were transferred to the State-run City of Houston HAP and State-run Harris County HAP upon the passage of APA 7. Once received, the GLO immediately began contacting those transferred participants to determine their status and the disaster assistance that could be provided.

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While these outreach efforts and lengthy application period have ensured that the GLO has engaged as many affected homeowners in the City of Houston and Harris County as possible. The GLO remains committed to helping those adversely affected by Hurricane Harvey and will continue working to serve all remaining eligible program participants.

Comment Received: As the epicenter of Hurricane Harvey, the State-administered Harris County program reports receiving 2,593 applications; we are unaware of how many applications were received by the Harris County- administered program before the GLO took over in January 2020. This number is lower than all but two of the State-administered programs in other Councils of Government (COG). This suggests a woeful lack or failure of outreach on the part of GLO to Harris County residents.

Response: Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

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In addition to providing substantial community outreach, the GLO provided a lengthy application period to City of Houston and Harris County applicants; the application period for Houston/Harris Counties applicants was open for three years from May 2020/July 2020 to June 30, 2023.

As a result of this outreach, 10,468 individuals were engaged regarding assistance through various food distribution events, partnerships, and marketing material blasts. The GLO also facilitated a 7-week targeted digital campaign that yielded 446,401 impressions and 613 clicks. Round 3 of outreach contacted 5,574 individuals through voice message, text message, email, social media, and postcard campaigns. In total, the three distinct rounds of outreach contacted a total of 35,893 individuals and resulted in an average of 80 viable applications per month over the entire intake period.

Comment Received: The program in Harris County has also been extraordinarily slow to provide assistance. Only 15.4% of the applications are in the "approved/underway/ construction complete" category. Two of the five COG programs have rates approaching 50 percent. As noted earlier, 79.2 percent of the Harris County applications failed to result in any housing assistance. All of the other areas had significantly lower rejection/termination rates. Taken together this data shows that the GLO's justification for Amendment 12, the assertion that the housing need in Houston and Harris County has been met, is incorrect. Furthermore, taking into consideration the data originally established in Amendment 1 of this Action Plan, there is a drastic difference between the unmet need reported in 2018 and the assistance attained by Houston and Harris County residents through CDBG-DR funds.

Response: The State-run HAP for Hurricane Harvey impacted homeowners outside the City of Houston and Harris County started taking applications versus surveys on December 3, 2018. The GLO immediately began eligibility review of submitted applications. The GLO was able to begin the construction of Hurricane Harvey damage homes in December 2018.

Beginning in March 2020, the GLO started working alongside the City of Houston and Harris County to help affected homeowners receive housing assistance as efficiently as the agency did for those homeowners located in areas covered by State-run Housing Assistance Programs (HAP). Upon approval of APA 7 by HUD, the GLO began fully operating the State-run City of Houston HAP and State-run Harris County HAP.

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While these outreach efforts and lengthy application period have ensured that the GLO has engaged as many affected homeowners in the City of Houston and Harris County as possible. The GLO remains committed to helping those adversely affected by Hurricane Harvey and will continue working to serve all remaining eligible program participants.

Comment Received: Amendment 12 proposes to require the Harris County Flood Control District to expend 50 percent of the new funds on low- and moderate-income (LMI) households. Due to the failure of the GLO to fairly allocate adequate infrastructure funds to Harris County, the county disproportionally allocated county flood bonds and other funds to non-LMI areas. This left a huge deficit in funding for projects that provide flood protection for LMI neighborhoods. This problem has been extensively publicly discussed in the press. Yet in Amendment 12, GLO proposes to only require Harris County to expend the statutory minimum of 50 percent of these reallocated funds to the benefit of LMI households. Given the

past underfunding of LMI neighborhoods (which has a large negative disparate racial impact on African American and Hispanic households) a 50 percent LMI benefit level is completely inadequate. The LMI targeting of future CDBG-DR funds awarded to Harris County should provide that all CDBG-DR funds received should benefit LMI households.

Response: The GLO is committed to distributing CDBG-DR funding to accomplish the national objective of assisting Low- and Moderate-Income level (LMI) households in accordance with HUD's requirements in the February 9, 2018 Federal Register notice. The GLO will ensure that at least 70 percent of aggregate program funds provided to the state of Texas will be used to benefit LMI households. Please see *Table 55: Total LMI Budget* on page 147 of this APA 12 to see how the GLO calculates its compliance with the LMI requirement. Estimated projected funding benefitting LMI persons as of the issuance of APA 12 is $3,983,642,947, or 77%, of CDBG-DR funding provided to the state of Texas for Hurricane Harvey disaster recovery which is 7% more than required by HUD.

State of Texas Plan for Disaster Recovery: Amendment 11

Amendment 11 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on October 7, 2022, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran to November 7, 2022. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those that submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
Downey	Keith	Kashmere Gardens Super Neighborhood Council #52
Rodriguez	Eliza	Individual
PFG		Individual

The following is a summary of the comments received as well as the response.

Comment Received: For the City of Houston to return $140.9 million to GLO for the Home Owners Assistance Program for those affected by Hurricane Harvey puts many residents in marginalized communities at a huge disadvantage. Residents have been waiting for over 5 years many at the phase of pulling their permits and are living out of boxes at the threshold of construction. Only to be told by GLO they don't meet the criteria of the General Land Office. While others are still waiting in the pipeline for approval while being jostled around between the City of Houston and GLO. That's not the way to treat people. How many people have passed away while waiting for repairs to take place. Equity is a word that's seldom used and if it's used it's not put into practice. Returning the funding hurts too many people. Yes the city of Houston housing should get themselves in gear if they have the money at hand to help those who don't have a parachute such as homeowners insurance or other financial means. But taking the money back with more stringent requirements is not a good practice for Texas residents.

Response: Amendment 11 reallocates $140,930,253 from the City of Houston administered disaster recovery programs to the State administered City of Houston Homeowner Assistance Program. The funds are being reallocated from the City of Houston administered disaster recovery programs that failed to meet program contract benchmarks. All of the $140.9 million will be used to serve homeowners in Houston who are still in need of and awaiting assistance. The vast majority of this funding (approximately 80%) will be used to provide assistance to low- and moderate- income families. The requirements for the funding are the same and are no more or less stringent when administered by the City or the State. The GLO remains committed to the impartial treatment of all applicants and is committed to the effective and efficient use of disaster recovery funds while advocating for all Texans throughout the recovery process.

Comment Received: Can these funds can assist citizens in the Nueces county? There is still a lot of homes that need to be repaired or Rebuilt. This will also help the community. Please reconsider assisting the citizens in Nueces County.

Response: Based on the Hurricane Harvey unmet needs assessment these funds will remain to address unmet recovery needs within the City of Houston. Applications for the Coastal Bend Region Homeowner Assistance Program (HAP closed December 31, 2019). As of November 10, 2022, 619 Hurricane Harvey damaged homes within Nueces County have been rehabilitated or reconstructed. Another 55 homes are either under construction or pending start of construction.

Comment Received: I would like to be considered in the amendment and have further questions.

Response: : The GLO welcomes any and all public comments and is committed to answering specific questions received by phone, mail, or email at: cdr@recovery.texas.gov.

State of Texas Plan for Disaster Recovery: Amendment 10

Amendment 10 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on March 16, 2022, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran to April 18, 2022. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name	Individual, County, City or Organization
None	None

Comments: The GLO did not receive any comments on Amendment No. 10.

State of Texas Plan for Disaster Recovery: Amendment 9

Amendment 9 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on August 19, 2021, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran to September 19, 2021. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name	Individual, County, City or Organization
Robert Graham, Jr.	Individual

The following is a summary of the comments received as well as the response.

Comment Received: Harris County received the most impact from Hurricane Harvey. The recovery funds should all go to Harris County residents in the form of programs that protect individual property owners with barriers, pumps, and lifts, instead of big public projects that only mitigate flood damage to infrastructure.

Response: Harris County is responsible for program development and project selection under Harris County Administered Disaster Recovery Programs. More information about the Harris County Administered Disaster Recovery Programs is located on the County's recovery website: http://harrisrecovery.org/. The Texas General Land Office monitors that selected projects are eligible and comply with federal regulations. Eligible infrastructure activities must identify how these activities will contribute to the long-term recovery and restoration of housing.

State of Texas Plan for Disaster Recovery: Amendment 8

Amendment 8 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on March 15, 2021, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran to April 14, 2021. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name	Individual, County, City or Organization
Julia Orduña	Texas Housers
Chrishelle Palay	Houston Organizing Movement for Equity Coalition
Celeste Arredondo-Peterson	Texas Organizing Project – Houston
Tom McCasland	City of Houston Housing and Community Development Department
Tamara Washington	Individual Community Member

The following is a summary of the comments received as well as the response.

Comment Received: The timeline proposed in Amendment #8 for the delivery of housing assistance is far too slow and the information projecting the expected program performance provided is inadequate. There is no single area related to the Hurricane Harvey recovery that has garnered more public outrage and criticism than the unconscionably slow performance of both State and local governments in making CDBG-DR funds available for housing. For this reason, Amendment #8 should: (1) include a section evaluating the performance of each housing program to date in terms of the scheduled and actual delivery of housing program assistance; (2) provide an analysis of the causes of delays in programs that exceeded their initial timeline projection and set forth the specific program reforms and steps that the GLO will put in place to correct these delays; (3) propose "trigger points" that, if reached, will cause the GLO to review and terminate contracts if warranted and transfer administrative responsibility with Harris County and the City of Houston for failure to meet program performance benchmarks; (4) retain an independent third-party auditor to track program performance and beneficiary satisfaction with housing programs administered by the GLO, City of Houston, and Harris County and to publicly report that data on a quarterly basis; (5) revise the timelines for completion of all program expenditures to project full expenditure of all housing program funds within 24 instead of 36 months; and (6) commit to automatic termination of contracts with Harris County and the City of Houston if they fail to meet program performance benchmarks in two consecutive quarters.

Staff Response: Under Section 5.3., "City of Houston Administered Disaster Recovery Program," the description for each City of Houston administered program includes the following compliane criteria: "Program Benchmarks: Subrecipient's failure to achieve a Program Benchmark in the

Subrecipient Agreement may result in the termination of the Program and/or funds being removed from the Contract, at the GLO's sole discretion."

Comment Received: Many households who applied years ago do not know their current application status. Amendment #8 should require that immediately all applicants who have not received assistance will be contacted by an assigned caseworker that will: (1) inform the applicant exactly where they are in the process of receiving assistance and accurate next steps; (2) provide an informed estimate of the date the applicant can expect to receive the assistance; and (3) assist the applicant in completing any additional steps in the qualification process including but not limited to directly connecting the applicant with the proper subcontractor, government department, or public/private partnerships to obtain necessary records.

Staff Response: The City of Houston makes applicant status information available for their single-family programs through the Houston Recovery website, recovery.houstontx.gov or via phone at 832-393-0550. The State-run City of Houston and Harris County HAP also have a website link available for applicants to check their application status on the HAP webpage, recovery.texas.gov/hap or via phone at 1-844-893-8937.

Comment Received: Given the length of time between the 2017 disaster and the present, the GLO should reevaluate unmet housing needs that remain, with a particular focus upon unmet housing needs of renters. The GLO should adjust the formula fund allocation between housing program categories to serve homeowners and renters proportionally to reflect their current share of unmet housing needs. The methodology used by GLO in Amendment #8 is flawed.

Staff Response: The Texas General Land Office, along with its Subrecipients and other agencies directly administering CDBG-DR programs, work to ensure all recovery efforts are based upon an unmet needs analysis utilizing the most current data available. The feedback provided in this comment will be given adequate consideration moving forward.

Comment Received: The rent levels established in the Hurricane Harvey Action Plan do not equitably serve renters of extremely low- and very low-income, which are disproportionately the income categories impacted by Hurricane Harvey still having unmet housing need. GLO program rents set at the High HOME rent standard are not designed to meet the needs of renters who are Hurricane Harvey survivors. Rather than to accurately assess the unmet housing needs, the GLO instead simply established rent levels at the maximum permitted under federal statute. The GLO should have considered the federal maximum rent thresholds for what they are — ceilings for maximum rents not to be exceeded, but in no way an accurate reflection of disaster survivors' unmet housing need.

Staff Response: The majority of the grant funding administered by the City of Houston is allocated to certain programs designed to benefit low- and moderate-income households housed in rental dwellings (i.e. the Multifamily Rental Program and the Small Rental Program). The City of Houston also has other programs that benefit renters by providing tools that aid renters in becoming homeowners (Homebuyer Assistance Program and Single Family New Development Program).

Comment Received: In making a certification to HUD that it is in compliance with Title VI, the GLO must assess and remediate the historical and ongoing illegal patterns of misuse of federal funds it administers that have deprived African-American and Hispanic neighborhoods of equitable access to federally funded infrastructure programs. The failure of the State, the

County and the City to accurately assess missing flood control infrastructure needs (i.e., storm sewers) along with other critical infrastructure in low-income African-American and Hispanic neighborhoods represents a violation of Title VI of the United States Civil Rights Act of 1964.

Staff Response: Each CDBG-DR program, , undergoes an Affirmatively Furthering Fair Housing ("AFFH") review before implementation. Additionally, each project, including all infrastructure projects, undergo an AFFH review prior to approval. The AFFH process, as a whole and as required by law, works to address the concerns presented in this comment.

Comment Received: Many multifamily housing developments [city of Houston emphasis] continue to be built in high poverty, racially segregated neighborhoods in violation of the law. Amendment #8 should provide that the GLO will proactively review activities by the GLO, the City and the County related to the location of housing and will provide for both public hearings and a complaint process that actually investigates Fair Housing compliance.

Staff Response: The GLO completes an Affirmatively Furthering Fair Housing review for every City of Houston and Harris County multifamily project. The GLO issued a letter to the City of Houston raising similar concerns identified in the GLO's review process on 4/6/2021asking that the City of Houston take these concerns into consideration during the program design phase as part of issuing NOFAs for this program and related programs (i.e., Single Family New Development). The GLO remains committed to ensuring all programs and projects are in compliance with federal fair housing laws.

Comment Received: The City of Houston's new housing construction program proposes to steer disaster survivors, who are predominately Hispanic and African-American persons, into low-income, flood-prone, economically depressed and racially segregated neighborhoods through this geographically-directed use of federal CDBG-DR funds.

Staff Response: The City of Houston's single-family new construction program has not yet chosen sites for construction of the new homes. All development sites will undergo an Affirmatively Further Fair Housing ("AFFH") review. The City of Houston will conduct its own AFFH reviews and identify "Complete Communities" as the focus of its land acquisition efforts that will be reviewed by the GLO.

Comment Received: Individuals being assisted to relocate under the buyout program or any other program (including renters) should receive Fair Housing counseling and assistance provided by the GLO under the May 2010 Fair Housing conciliation agreement between Texas Housers and the State of Texas in the Hurricane Ike CDBG-DR program. Texas Housers specifically refers here to the Homeowner Opportunity Program (HOP) through which individuals considering relocation or rebuilding on an existing site were offered Fair Housing counseling and the services of a real estate professional to assist them to identify homes in less flood prone and higher opportunity neighborhoods that might better meet their needs.

Staff Response: The GLO and its relocation and buyout programs comply with all Uniform Relocation Assistance and Real Property Acquisition Act ("URA") requirements.

Comment Received: Reporting requirements on GLO and subgrantee or subrecipient performance as provided for in Amendment #8 are inadequate to monitor basic program performance or civil rights compliance. Texas Housers supports the recommendations of the

Harvey Forgotten Survivors Caucus that GLO establish and support a citizens' monitoring advisory committee to assist the agency in monitoring and oversight and understanding program operations and issues from the perspective of low- and moderate-income beneficiaries.

Staff Response: The Texas General Land Office is committed to the effective and efficient use of CDBG-DR and CDBG-MIT funds. The GLO remains open to considering analytical feedback from community groups like the one referenced in the comment to improve the administration of disaster recovery programs.

Comment Received: Texas Housers objects to the reduction in relocation assistance GLO proposes to adopt in Amendment #8 discussed on page 133 [waiver of the Section 104(d) requirements allowing for an optional 60-month rental assistance period instead of standard URA 42-month assistance period]. The GLO argues in the amendment that it is eliminating this option for lower income households to "… assure uniform and equitable treatment…" in the interest of "equity." This provision is the exact opposite of equity, however. The interest of lower-income households to be able to afford a place to live surely is more important than any possible administrative benefits of establishing uniformity between households with different income levels. Texas Housers urges that this section be struck from Amendment #8.

Staff Response: The GLO is following the language posted in Federal Register Notice 5858.

Comment Received: The provisions on page 134 setting limitations on costs to raise a home above base flood elevation should be revised. Houston has modified its ordinances to require that a house be elevated above the 100-year FEMA flood elevation level in order to obtain a building permit. The areas in which this will be necessary are overwhelmingly in African-American and Hispanic neighborhoods where there are large concentrations of extremely low- and very low- income homeowners and renters. Thus, the policy set out in Amendment #8 will require waivers in most instances for homes in these neighborhoods. Amendment #8 fails to state the basis for granting or denying a waiver. All households should be eligible for elevation.

Staff Response: As required by the Federal Register notice for the Action Plan, the GLO must consider cost reasonableness and the average cost of home elevations when designing programs. To maintain cost reasonableness, the GLO established several housing assistance caps outlined in the GLO's Hurricane Harvey Housing Guidelines. The GLO's Hurricane Harvey Housing Guidelines outline the waiver requirements for subrecipient housing programs.

Comment Received: Texas Housers strongly supports the initiative in Amendment #8 by the GLO to undertake pre-disaster planning. This section, found on page 138 of the amendment, should be expanded to include a more detailed description of the type of planning activities that will be undertaken. It is important that the GLO reach beyond just state and local government officials and involves interested citizens and low- and moderate-income people in these pre-planning activities.

Staff Response: The feedback provided in this comment will be given adequate consideration moving forward. The GLO encourages the commenter to provide more detailed suggestions for this effort.

Comment Received: Amendment #8 indicates on page 142 that 70 percent of funds will benefit low- and moderate-income households. At this very late hour in the recovery, most all non-low and moderate-income persons have recovered from the disaster. The GLO should recognize this fact in the amendment and modify this provision to require that 100% of the remaining funds are used to benefit low- and moderate-income households.

Staff Response: As required by the Federal Register Notice governing these funds, the GLO must ensure at least 70 percent of all program funds will benefit LMI persons in the disaster-impacted area.

Comment Received: Amendment #8 fails to take into account the severe economic problems that low-income households have encountered as a result of the COVID-19 pandemic. The GLO should permit applicants who are currently unable to pay their property taxes [and thus are disqualified from housing assistance] because of the economic impact of the pandemic, including job loss related to COVID-19, to be eligible for CDBG-DR assistance provided the applicant can demonstrate they have sought public assistance to pay their taxes.

Staff Response: CDBG-DR funds must be used to respond to the specific disaster for which the funds were allocated. However, given the effects of the COVID-19 pandemic, the City of Houston and the GLO have identified ways to accommodate pandemic-specific impacts when reasonable, in accordance with the requirements set by the federal government and the State of Texas.

Comment Received: Page 158 of Amendment #8 sets forth the criteria under which a subrecipient may re-develop property acquired with funds from the Hurricane Harvey CDBG-DR program; in most instances these properties are located in parts of the city of Houston which are flood prone, located in hard to find racially and economically concentrated areas of poverty and are in areas of extremely high levels of residential racial segregation. It is incumbent upon the GLO to make clear to its subrecipients that in doing so the subrecipient must act in a manner consistent with the obligations of the State of Texas and the recipient to re-develop these properties in a manner consistent with compliance with the Fair Housing Act and the duty to Affirmatively Further Fair Housing.

Staff Response: All proposed subrecipient buyout or acquisition programs and projects undergo an AFFH review, as required by law, prior to execution. AFFH reviews work to adequately identify and address the issues presented in this comment.

Comment Received: Rents set at the High HOME standard are completely unaffordable to most renter households with an unmet housing need in the Houston/Harris County area. The proposed amendment's changes [Page 165 of Amendment #8] to the rental housing program are inconsistent with the unmet housing needs of low- and moderate-income households in the area; thus, the up-to-$25 million per development subsidy in CDBG-DR funds is essentially buying nothing, in terms of affordability, for households with an unmet housing need. This is simply an unconscionable waste of federal resources made worse by the layering subsidy provision that would permit the City of Houston to direct even more unnecessary and redundant public subsidy into the hands of private developers enriching themselves unjustifiably with public resources.

Staff Response: The City's Multi Family Rental Program ("MFRP") incentivizes developers to establish rents that are affordable to low-income households within these developments. As of March 2021, the City's MFRP is slated to rehab or construct almost 450 units that will be affordable to

households earning less than 30% of the Area Median Income ("AMI"). Additionally, nearly 1,200 more units are expected to be affordable for households between 31-50% AMI through the MFRP.

Comment Received: The 15- and 20-year affordability period proposed in Amendment #8 [for rental housing] are unnecessarily short and should be extended to 30-year use restrictions for rehabilitation properties and 45-year use restrictions for new construction properties. Affordability terms such as these are commonly being negotiated in other Texas cities and represent an appropriate level of public benefit for the amount of subsidies being provided to developers by this program.

Staff Response: The 15-year affordability period for rehabilitation or reconstruction of multi-family rental projects with eight or more units and the 20-year affordability period for new construction multi-family rental projects with five or more units are in compliance with the Federal Register Notice that governs these funds.

Comment Received: There are several references to the GLO administering programs in Houston. We recognize that the newly negotiated Subrecipient Agreement between the GLO and the City does allow for termination in certain cases, but we would recommend revised language [strike "the GLO"] on page 17 so that it reads: "Harris County or the City of Houston will manage these direct allocations. The State reserves the right to administer programs directly based on the performance in any subrecipient area." On page 210, revised language [strike "or the GLO"] should read: "The City of Houston will manage this direct allocation."

Staff Response: The current language will remain in the amendment.

Comment Received: Page 21 includes carryover language from Amendment 7 to the Action plan [but makes no mention of Amendment 8 that restores Houston's programs]. Revised language should read: "Programs within the City of Houston SAP were defunded and moved to a state-run homeowner assistance program, rental program, and economic revitalization program targeted within the city of Houston. This Amendment 8 restores all programs within the City of Houston SAP as further detailed herein."

Staff Response: A revision was made to clarify the language referenced in this comment.

Comment Received: There is an erroneous reference on p. 178; it provides "Harris County's local programs and requirements are outlined in section 5.3." This should be revised to state "The city of Houston's local programs . . ."

Staff Response: The GLO recognizes this administrative error and has made a revision to the section referenced above.

Comment Received: The discussion of relocation benefits on page 214 should be revised to [say] the following: "Homeowners may be eligible to receive up to $10,000 in benefits to pay for temporary rental assistance, moving and storage costs. The Director may, at their discretion, authorize an amount which exceeds $10,000, on a case by case basis. HoAP may provide TRA to owner-occupants who choose to move from their homes as part of the voluntary Program-provided repair and elevation or reconstruction activities."

Staff Response: The cap of $6,000 for temporary relocation assistance for housing programs is correct and will remain as written.

Comment Received: There are several comments that were already informally submitted to GLO; we reiterate them here: (1) There is an incorrect statement on page 218. The sentence providing, "At least 51% of land will be used for LMI homes" should be deleted and replaced with the following: At least 51% of households served will be LMI"; (2) On page 231, please replace the following: "ii. Dream Fund Program: a Line of Credit of $50,000 maximum and/or a Term Loan of $150,000" with "ii. Dream Fund Program: a Line of Credit and/or a Term Loan of $250,000." Also on page 231, please replace the following: "i. Small Business Grant Program: working capital grants of up to $100,000" with "i. Small Business Grant Program: working capital grants of up to $150,000."

Staff Response: (1) The GLO recognizes this administrative error and will make the correction suggested above. (2) The GLO will make these changes in Amendment 9. Amendment 9 will be posted for 30-day public comment period.

Comment Received: There are some minor differences in numbers, likely as rounding errors: (1) The LMI in the budgets for HoAP on pages 22 and 145-6 are off by one dollar and should be $73,352,371 and not $73,352,372; (2) On page 214, the HoAP estimated budget for rehabilitation/ reconstruction including project delivery should be $68,059,907 and not $68,059,908; and (3) The Project Expenditures and Outcomes p. 260 also include minor rounding errors, likely because cents are not used. For instance, all of the HoAP amounts added by quarter equals $1 more than the full budget. If all multifamily and HoAP are added by quarter, multifamily is $2 over the budget and HoAP is $2 less than the budget.

Staff Response: (1) LMI amount will be corrected. (2) HoAP estimated budget for rehabilitation/ reconstruction will be corrected. (3) Due to recent HUD technical assistance, the project expenditures and outcomes will be updated prior to submission of Amendment 8 to HUD.

Comment Received: The administrative budgetary discussion should be updated to conform to the new Subrecipient Agreement. Page 234 provides that "GLO will retain the full 5 percent allocated for administrative costs…The only exception is for an allowance for up to $15,000,000 of the City's program amounts for administrative costs." However, the new Subrecipient Agreement at Performance Statement 10 states that the City's administrative costs "will not exceed two and a half percent (2.5%) of the allocation," an amount equal to $19,924,696.08 and not $15 million.

Staff Response: The city of Houston administration budget of $15,000,000 does not exceed 2.5% of the allocation.

Comment Received: Years have gone by and my mom is still in a phase she was in a year ago.

Staff Response: Thank you for your public comment. The GLO has referred this case to the GLO's Customer Relations.

Comment Received: I have sent appeals [regarding my own application for housing assistance] with no favorable resolve.

Staff Response: Thank you for your public comment. The GLO has referred this case to GLO's Customer Relations.

Comment Received: Please explain how moving forward is going to be beneficial to the citizens that really need help.

Staff Response: Thank you for your public comment. The GLO has referred this case to GLO's Customer Relations.

Amendment 7 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on June 1, 2020, commencing the required 30-day public comment period. The Amendment was posted on the GLO website. The public comment period for the document ran to June 30, 2020. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
Robinson	Ann	Montrose Center
Costis	Thao	SEARCH
Brusatori	Kim	The Village Centers, Inc.
Harang	Juanita	Child Care Council of Greater Houston, Inc.
Guess	John	
Stoecker	Daniel	The Alliance
Joost	David	
Flash	Charlene	Avenue 360
Paul	Michelle	Capital IDEA Houston
Cove	Sarah	
Solis	Rene	BakerRipley
Dobbins	Michelle	
Lawler	Mary	Avenue Community Development Corp.
Mukhtiar	Sheroo	SERjobs
Duldulao-Ybarra	Alma	Goodwill Houston
Vargas	Steven	Houston HIV Prevention Planning Group
Lemons	Keith	Cornerstone Home Lending, Inc.
Alcorn	The Honorable Sallie	Houston City Council
Rodriguez	Bennie	Houston Area Urban Community Development Corp.
Coffey	Anna	The Women's Home
Fields	Bethany	
Griffin	Alyson	Cross-country Mortgage
Dunn	Renee	SECURE Mortgage Company
Alfred	Amber	Houston Association of Realtors
Nugent	John	
Mikelman Colbert	Steve Cynthia	Catholic Charities of the Archdiocese of Galveston-Houston
Harris	Lori	Houston Housing Collaborative
Dow Nguyen	Steven VanNhi	Local Initiatives Support Corporation, Houston

Name		Individual, County, City or Organization
Last	**First**	
Watkins	Elizabeth	The Watkins Group Realty
Isbell	Frances	Healthcare for the Homeless – Houston
Brown	Carlie	
Brady	Edward	Home Builders Institute
Manigault	Mike	
Whitehurst	Emilee	Houston Area Women's Center
Rickenbacker	Donna	DWR Development Group, LLC
Flanagan-Payton	Kathy	Fifth Ward Community Redevelopment Corporation
Puffer	Scott	Brinshore Development
Whitlock	Anne	My Connect Community
Olsen	Anne	Buffalo Bayou Partnership
Takahashi	Brenda	Individual Community Member
Wolf	Lacy	Gulf Coast Area Labor Federation
Puente	Paul	Houston Building and Construction Trades Council
Wertsch	Nick	Workers Defense Project
Hendricks	Jeremy	
Not given	Not given	Harvey Forgotten Survivors Caucus
Enriquez	Omar	Amegy Bank
Thiele	Mark	Houston Housing Authority
Palay	Chrishelle	Houston Organizing Movement for Equity
Sloan	Madison	Texas Appleseed
Pirtle	Adam	Texas Housers
Nichols Villarreal	Mike Catherine	Coalition for the Homeless
Lee	Congresswoman Sheila Jackson	Congress of the United States House of Representatives
Lewis	Ronald	City of Houston
McCasland	Tom	
Jacobs	Veronica	Houston Volunteer Lawyers
Bogany	Shad	Individual Community Member

The following is a summary of the comments received as well as the response.

Comment Received: It is often better for our program activities [e.g., community outreach, substance abuse/mental health recovery, and job training] when it can be administered locally by people who know the community best and can advise us on relationships and connections with other providers.

Staff Response: The GLO values its long-standing relationships with local community members and will continue to collaborate with City and County stakeholders to expedite needed recovery.

Comment Received: Since GLO does not have a public service department, how does GLO plan to serve Houston's vulnerable populations, e.g., the homeless, individuals in need of mental health counseling, substance abuse recovery, and job training? ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO remains committed to the administration of CDBG-DR programs as authorized under federal law. All allowable programs and services will be performed in a manner that seeks to serve the local population within the bounds of the law. The GLO agrees the City of Houston has the capacity to maintain this program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: If funds are recaptured from Houston, will GLO honor our executed agreement with the city to provide social services to the community? ***(Multiple respondents provided this feedback.)***

Staff Response: It is the intent of the GLO to reimburse the City of Houston for expenses incurred that the GLO deems eligible.

Comment Received: As a partner with the City's [Houston] Housing team for more than 20 years, SEARCH Homeless Services has witnessed their demonstrated commitment and effectiveness in meeting our community's greatest needs.

Staff Response: The GLO recognizes this feedback regarding the City of Houston's work with SEARCH Homeless Services. The GLO agrees the City of Houston has the capacity to administer a Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Does the GLO intend to honor the already approved public service agreements should funds be recaptured? Our continuum of care depends on the GLO honoring those service agreements and the City's maintaining the DR-17 public service funds that effectively rebuild lives in Houston.

Staff Response: The GLO remains committed to the administration of CDBG-DR programs as authorized under federal law. All allowable programs and services will be performed in a manner that seeks to serve the local population within the bounds of the law. The GLO agrees the City of

Houston has the capacity to maintain this program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Without HCDD's help and support, the Village would not exist as it does today; it has been a vital relationship and we hope to continue to work with their department now and in the future.

Staff Response: The GLO recognizes the support provided in this comment.

Comment Received: Child Care Council of Greater Houston, Inc. (CCC) stands in support of maintaining the City of Houston as a subrecipient and Housing and Community Development Department (HCDD) as the administrator of all DR-17 programs, including the Public Services Program.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: HCDD's Public Services programs serve as a bridge to connect families rendered vulnerable due to the effects of Hurricane Harvey to programs that will support their recovery and increase their knowledge of how to access assistance after natural disasters; DR-17 Public Service Programs are imperative and Child Care Council implores you to see the value of retaining this support for families in the City of Houston at the local level.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Because local government is more likely to be responsive to residents' needs and concerns than are state government officials who far removed both geographically and in terms of their awareness of local social conditions, we support the City of Houston retaining the authority locally to manage and administer CDBG DR-17 funds.

Staff Response: The GLO remains dedicated to collaborating with communities to ensure that all programs and policies are crafted in a manner that best serves the needs of that particular community. The GLO values its long-standing relationships with local officials and community members and will continue to collaborate with city of Houston stakeholders in order to expedite needed recovery. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents.

Comment Received: The City of Houston's Housing and Community Development Department (HCDD) has a long history of efficiently administering Public Service funds associated with the CDBG program while the Texas General Land Office has no such history.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: It is crucial for local communities to have the means to hold government authorities accountable for their actions through elected representatives.

Staff Response: The GLO champions accountability and transparency in the administration of CDBG-DR funds.

Comment Received: The GLO should reconsider its action plan amendment to withdraw its subrecipient contract with the City of Houston to administer all DR-17 programs, including Public Services Programs. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: We would be hard-pressed to meet the varied needs of our clients and patients if we could not refer clients to services provided through the DR-17 programs and other public services programs administered by the City of Houston.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: We feel no other entity, aside from the City, is better equipped to administer these funds and programs; the City of Houston possesses intimate knowledge of the needs of the community, and its citizens, and is positioned to best prioritize the service delivery strategy to meet those needs. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support provided in this comment.

Comment Received: In our opinion, the lack of local oversight of these services and programs will be detrimental in meeting the needs of those residing in the Houston/Harris County metropolitan area.

Staff Response: The Texas General Land Office shall give adequate consideration to the feedback provided in this comment.

Comment Received: CIH is a recipient of the city's CDBG DR-17 funds and HCDD has a proven track record of responsible stewardship of the city's Public Service Programs.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including Public Services program.

Comment Received: To change the administration process now will likely slow down the speed of these funds.

Staff Response: The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 17, 2024.

Comment Received: The GLO does not have the infrastructure, expertise, or staff in place to administer CDBG DR-17 funds, whereas Houston's HCDD has collaborated with CIH for upwards of ten years in the administration of CDBG funds.

Staff Response: The GLO recognizes the support provided in this comment. Additionally, the GLO remains committed to ensuring the effective and efficient administration of all CDBG-DR funds and, when required, will undertake appropriate measures to increase its capacity to perform. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents.

Comment Received: The GLO does not have the familiarity with Houston and its citizens, unlike HCDD, who regularly hold public hearings and incorporate the voice and needs of our local communities into long-term plans for improving the quality of life for all Houstonians.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents.

Comment Received: The City should continue to administer its own Public Services program—to continue working diligently with community partners—to continue efforts to serve and support, not only the individuals and families going through the HoAP, but all within the City of Houston.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: It is the needs of the local communities that count, and the City as well as its recipients of the Public Service funds, understand the needs and struggles of our local communities, and we are all committed to helping individuals and families achieve and adjust to their 'new normal.' Therefore, we are asking the Texas General Land Office to allow BakerRipley and others to continue our efforts in partnership with the City.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Let's not add another level of frustration to families who already feel defeated and who have opened their lives up to those working under the City's umbrella; it is our strong belief that the disruption in services will negatively impact the individuals and families being served.

Staff Response: The GLO remains committed to ensuring the effective and efficient administration of CDBG-DR funds. As such, all appropriate steps will be taken to ensure CDBG-DR programs and services will be administered timely and in a manner that best serves the needs of impacted individuals.

Comment Received: Consider that the funding in question provides opportunities for local nonprofits, minority, and women-owned business. This is what keeps our region a place of opportunity for all—a place where we can support each other, especially in disastrous times.

Staff Response: The GLO recognizes the feedback presented in this comment.

Comment Received: As a subrecipient of the DR-17 funds, SERJobs plans to utilize these funds to expand our services (training, employment, and financial services) to improve the resilience of individuals affected by Hurricane Harvey; we look to the City of Houston for guidance and continued partnership as we navigate through the project because of their expertise, knowledge, and experience with regards to the needs of the community as well as regulatory requirements.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Our coordination of services with the City of Houston has been integrated with multiple sectors to serve persons affected by Hurricane Harvey and other natural disasters; we ask that the continuity of service (that the City of Houston can carry on administering their own public services programs) and partnership remain with the City of Houston.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are

not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: The needs of our community members are very complex, and if there were to be a major change, it would present a service barrier in referring clients.

Staff Response: The GLO recognizes this feedback provided in this comment.

Comment Received: I trust the leadership in Houston and have confidence they see the people behind the numbers in whatever data they gather to determine solutions to our needs. This same trust does not exist for a state-run program. In light of that, I humbly request the removal of Amendment 7 from the State Action Plan.

Staff Response: The GLO recognizes the support provided in this comment.

Comment Received: Amendment 7 to the State Action Plan will remove funding for job training, a service many who have lost employment need. Due to the coronavirus, some have no employment to which they may return. Therefore, job training is needed to facilitate their economic improvement.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Homeless services funding will be negatively affected by the inclusion of Amendment 7. Many experiencing homelessness will not receive help with securing and maintaining housing, increasing their risk for contracting coronavirus and worsening its effects on Houston; additionally, people fleeing domestic and/or sexual violence will have less resource for assistance as they try to survive.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: The valuable diversity of our state, particularly in our city, challenges efforts to have a centralized decision-making body removed from the daily experiences of Houston's most vulnerable.

Staff Response: The GLO recognizes the support provided in this comment. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure all Hurricane Harvey recovery programs address the needs of Houston residents.

Comment Received: Should Amendment 7 not be removed, will our most vulnerable need to wait as the state ramps up a program to assist? Increasing the danger under which many

receiving currently funded services should be unthinkable as our country experiences multiple crises.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO seeks to speed up, not impede, the recovery process for Harvey-impacted communities—including Houston residents. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents.

Comment Received: Amendment 7 jeopardizes Houston's efforts to effectively mitigate the impact of disasters, such as hurricanes and pandemics; impedes efforts which help vulnerable people gain resilience; and demonstrates a lack of support at the state level for its most populous city, one of at least six economic juggernauts which help sustain our state economy, by compromising local efforts.

Staff Response: The GLO recognizes the support for local administration provided in this comment.

Comment Received: The City of Houston's Housing and Community Development Program should remain in control of the home buyer assistance program; they are doing a good job now the last thing we need is anything that slows the process down.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Homebuyer Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: The GLO is proposing to eliminate all funding – nearly $1.3 billion – administered by the City to aid residents of Houston in recovery from Hurricane Harvey, even though the GLO agrees that the City has performed well in administering almost every program recovery program within its control.

Staff Response: The GLO is not eliminating the funding $1.3 billion CDBG-DR to address the unmet housing recovery needs for the residents of Houston. The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 17, 2024.

Comment Received: The GLO's only stated concern relates to the single family construction program. We had an admittedly slow start, with missteps at the beginning that have since been resolved. While I am disappointed more residents have not been assisted in the nearly three years since Harvey, the City started with the most vulnerable, where documentation was difficult.

Staff Response: The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents. The elimination of funding under the GLO's contract with the City,

while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 17, 2024.

As of end of June 2020, the State-run HAP has assisted over 1,500 Hurricane Harvey impacted homeowners through the rehabilitation and reconstruction of their homes including the most vulnerable. The GLO is currently implementing a State-run HAP that covered 48 Hurricane Harvey impacted counties. Over 80% of homeowners approved for State-run HAP assistance are low-and moderate income with 45% of homeowners assisted in the lowest area median family income category (0 to 30% AMFI).

Comment Received: The City has performed very well on its public services and multifamily programs and should not risk losing funding attached to these well-run initiatives. The City's multifamily programs exceed the standards set by the State and ensure more affordable housing for longer lengths of time than necessary for State-backed programs.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Multifamily Rental Program and Public Services program when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Local control and local decision making are important aspects of the recovery process, especially in a city as large as Houston. The City has long-standing relationships with neighborhood associations, community groups, and grant subrecipients. The City's recovery programs were established with the input of local residents and are specifically designed to address their needs.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO values its long-standing relationships with local community members and will continue to collaborate with city of Houston stakeholders to expedite needed recovery.

Comment Received: The HCDD's Homebuyer Assistance Program has been a pleasure to work with and we wish to express our desire for their continued involvement in helping our clients and communities we serve directly. They understand community-based organization like ours. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Homebuyer Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Over the past 4 years, we have seen the City of Houston work diligently to respond to the evolving needs of our community, especially during Hurricane Harvey and the COVID-19 health crisis. The city has both the experience and expertise to procure public services that will best impact the Houston area. For these reasons, I strongly believe that the City of Houston should be allowed to administer its own public services program.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: The Women's Home is utilizing CDBG DR-17 funds to provide case management, mental health counseling, substance abuse services, and job training and adult education to Houston area residents so that they may acquire the tools and resources they need to recover from the effects of Hurricane Harvey and build a foundation for long-term resiliency and success.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Local leaders are best positioned to assess, articulate and advocate on behalf of the needs of their community.

Staff Response: The GLO recognizes the support provided in this comment for local administration. The GLO values its long-standing relationships with local community members and will continue to collaborate with city of Houston stakeholders to expedite needed recovery.

Comment Received: Please do not disrupt the city of Houston's Downpayment Assistance Program. Today they have an even stronger management team in place; by far, this is the best team that has administered and managed the City of Houston DPA program.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Down Payment (Homebuyer) Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Through the assistance of Houston's Housing Department and their staff, we have been able to change neighborhoods within the City of Houston. Homeownership makes neighborhoods safer and gives lower income families an opportunity to substantially increase their net worth over time. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support provided in this comment.

Comment Received: The Houston Association of REALTORS® (HAR) would like to express our gratitude for the incredible strides the Texas General Land Office (GLO) has made to help Texans since the massive devastation of Hurricane Harvey. Your strong leadership during times of crisis is greatly appreciated.

Staff Response: The GLO appreciates the support offered in this comment.

Comment Received: Housing affordability in the Houston area is declining and for many it is nearly impossible to buy homes without significant subsidies. A large segment of our membership specializes in working with affordable housing programs, like the Homebuyer Assistance Program, to make sure all citizens have access to housing, and to funding to repair existing homes damaged due to a natural disaster.

Staff Response: The GLO recognizes the feedback presented in this comment.

Comment Received: It is critical that the GLO, the city of Houston, and Harris County work together to improve the current process, and not suddenly start a new one.

Staff Response: The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston and Harris County before the HUD funding terminates in August 17, 2024.

Comment Received: There is an urgent need to get funding directly to the people who need it most and having the largest and most populous city and county in the state of Texas administer the funding directly to their citizens just makes sense.

Staff Response: The GLO recognize the support for local administration provided in this comment.

Comment Received: Our service area includes multiple jurisdictions, and it is clear to us that needs, and service gaps often differ from locality to locality. Therefore, we believe, when possible, that decisions regarding policies and disbursement of funding are best made closest to where the projects or services are to be located; the City of Houston has substantial experience in funding these types of projects and in monitoring compliance with program regulations.

Staff Response: The GLO recognizes the support for local administration provided in this comment.

Comment Received: Please carefully consider the disruption to vital services our organization offers—including case management, housing assistance, counseling, nutritional support, employment services, pre-natal and parenting education, refugee resettlement and immigration legal services—that will result before changing program administrators in mid-stream. We appreciate your consideration.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: Houston Housing Collaborative calls upon state, county, and city officials to quickly resolve their differences; it is urgent that the government officials responsible for assisting residents to recover from Hurricane Harvey work diligently and collaboratively to quickly deploy the $2.4 billion in housing recovery funds as intended to repair damaged homes and develop replacement housing in the City of Houston and Harris County.

Staff Response: The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure the state-run Hurricane Harvey City of Houston recovery programs address the needs of Houston residents. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston and Harris County before the HUD funding terminates in August 17, 2024.

Comment Received: The importance of quality affordable housing has become even more evident in this time of the pandemic when residents are called upon to stay safe at home.

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: We are concerned that homeowners in desperate need of assistance will be confused by the lack of clarity about the administration of the program(s) and outreach from multiple parties.

Staff Response: The GLO has and will engaged in marketing and outreach efforts within the City of Houston for Hurricane Harvey housing recovery programs, including emails, texts, door hangers, and postcards.

Comment Received: It is essential that the $2.4 billion in funds [Houston and Harris County Hurricane Harvey direct allocations from the GLO] are used to repair and replace housing within the City of Houston and Harris County, and that these funds are not permitted to be spent in other jurisdictions.

Staff Response: The $2.4 billion in CDBG-DR funding is allocated to programs to address unmet housing recovery needs and to contribute to the long-term recovery and restoration of housing for the residents within the City of Houston and Harris County. These funds will remain dedicated for use within the City of Houston and Harris County.

Comment Received: We urge our public officials to continue to solicit public input regarding the use and deployment of these funds and to engage the public in multiple, accessible formats to reach vulnerable communities; it is important that these funds not be reprogrammed without appropriate community review and input.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO continues to adhere to its citizen participation plan, as required under federal law, in its administration of CDBG-DR funds. Please see section 6.1 of the Action Plan for full details on how the state solicits public input on its recovery programs and activities.

Comment Received: Solving Houston's housing crisis requires the collaborative effort of public, private, and nonprofit stakeholders.

Staff Response: The Texas General Land Office will continue its efforts to collaborate with all stakeholders to ensure that Hurricane Harvey recovery programs address the needs of impacted communities.

Comment Received: LISC has worked closely with the Houston Housing and Community Development Department (HCDD) - Public Services team to provide funds and technical assistance to LISC's local network of Financial Opportunity Centers (FOCs); LISC is a current

recipient of CDBG-DR 17 Public Service funding, from which we are providing, through our FOC network, workforce development, financial stability and public benefit access programming to residents impacted by Hurricane Harvey.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: LISC believes that locally driven delivery strategies are important; the individual and community dislocation caused by Hurricane Harvey requires a response that is managed at the local level. We are in support of a strategy that allows the quickest deployment of these important resources.

Staff Response**:** The GLO recognizes the support in this comment for local control. The GLO remains committed to the administration of CDBG-DR funds in the most effective and efficient manner possible. The GLO will continue to work with communities to ensure Hurricane Harvey programs meet the specific recovery needs of impacted Texans.

Comment Received: Our minority woman-owned real estate brokerage firm has an active relationship with HCDD management and staff that led to us hosting HUD Qualified Homebuyer Classes; HCDD staff are always present to answer first-hand any questions or concerns from the community, stakeholders and our faith-based leaders.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: The majority of our new homebuyers qualify and are specifically interested in the City of Houston's Down Payment Assistance Program. Currently, the Harvey Homebuyer's Assistance Program offers the most opportunity for those wanting to become a homeowner, to realize their dream of owning a home. Houston should continue to administer the City of Houston Homebuyer Assistance Program.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Downpayment (Homebuyer) Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: HHH's mission is to promote health, hope and dignity for those affected by homelessness through accessible and comprehensive quality care. Because the City has been instrumental in the development of the community's coordinated effort to address homelessness, and because it has a nuanced, specialized understanding of the unique needs of our community, we believe it is essential that they continue to administer to administer all DR-17 programs, including the Public Services Program.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs, including the Public Services program.

Comment Received: The lack of skilled labor is a severe issue for builders both in Houston and other parts of Texas; HBI trains, certifies, and places underserved populations in employment within the industry, and will be a recipient of CDBG-DR funds under the City of Houston's Public Services Program.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: HAWC is a recipient of the City of Houston CDBG DR-17 Multifamily Rental Program Funding to support the development of Temporary Supportive Housing for those fleeing domestic and sexual violence.

Staff Response: The GLO recognizes the support provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Multifamily Rental Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: In Houston, we know all too well how disasters increase domestic violence; in the wake of Hurricane Harvey, Houston saw a 45% increase in domestic violence homicides for women.

Staff Response: The GLO acknowledges the issue presented in this comment..

Comment Received: I respectfully request that the GLO not withdraw its subrecipient contract with the City of Houston (COH) and allow our City to continue to administer all DR-17 programs, including the Multifamily Rental Program. I cannot emphasis enough the integrity and hard work shown by the COH. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support for local administration provided in this comment.

Comment Received: Fifth Ward CRC supports local control of funds to ensure that Houston's residents and communities can hold the City of Houston and Mayor Turner accountable.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO values its long-standing relationships with local community members and will continue to collaborate with city of Houston stakeholders to expedite needed recovery.

Comment Received: We want to encourage the GLO to work collaboratively with the City of Houston and reconsider canceling the numerous programs the community needs.

Staff Response: The GLO remains committed to the effective and efficient administration of CDBG-DR funds. The GLO is dedicated to collaborating with local entities to ensure CDBG-DR fund and programs are administered as expediently as possible. The GLO will continue to work with city stakeholders to expedite needed housing recovery.

Comment Received: The City is best suited to apply local priorities and ensure local political as well as community support for projects in its jurisdiction to move forward. ***(Multiple respondents provided this feedback.)***

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO values its long-standing relationships with local community members and will continue to collaborate with city of Houston stakeholders to expedite needed recovery.

Comment Received: The first area relates to how GLO addresses Maximum Assistance. On page 134, Section 4.1.D that addresses Maximum Assistance, it states that all housing and buyout programs, the GLO's housing guidelines establish housing assistance maximums. There is an error in the fundamental premise stated in GLO's housing guidelines. This error negatively impacts homeowners by requiring them to adhere to standards that were designed for public housing and housing choice vouchers standards. Moreover, the required standard is not that of the HUD HOME Program.

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: The second area of concern is, given the new single family home development affordability trends in the City of Houston, why did GLO decide to remove the entire $222,269,086 funds allocated to City of Houston Single Family Development Program and reallocate the funding to the state-run City of Houston HAP? Whereas, the Harris County Single Family New Construction Program was allowed to remain funded at $82,137,529? What data resources and community impact statements were used to make this decision? GLO's decision disproportionately negatively impacts urban low-income minorities to acquire homeownership within the City of Houston.

Staff Response: The elimination of funding under GLO's contract with the city of Houston, while not taken lightly, was necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 17, 2024. Harris County accepted the GLO's technical assistance and collaboration to refine the county's existing recovery programs to better expedite needed Hurricane Harvey recovery within the County.

Comment Received: The actions and support of the HCDD in the community do not go unnoticed. Many community allies appreciate the open-door policy of this department and their commitment to the people who are working in order to provide for their families. We implore you to please extend this worthwhile department's program and keep it locally controlled.

Staff Response: The GLO recognize the support for local administration provided in this comment.

Comment Received: Respect the applicant and their wishes. Many times, government staff has been rude, pushy, with an unwillingness to assist to the full extent, and to the point of placing

blame on residents for the status of their situation. This is appalling and must be remedied. Homeowners must be respected and treated with patience and dignity.

Staff Response: The GLO makes every effort to accommodate applicants in the housing recovery process and is continually working to improve its robust and responsive customer relations services.

Comment Received: We believe there should be a Citizen Oversight Board and we are offering to be a part of the Board.

Staff Response: The GLO is currently accepting applications for membership on one of four regional Citizen Advisory Committees (CACs) that will advise the GLO on the implementation of CDBG-MIT programs. Please visit recovery.texas.gov/mitigation for more information and access to the CAC application.

Comment Received: Meaningful outreach is not only important, it is necessary. We expect the GLO to visit homes and explain to residents the program's rebuilding plans and expectations. We also expect GLO to partner with nonprofit and charitable organizations in the area that already have connections to the most vulnerable populations in the community.

Staff Response: The content of this comment and the reasoning behind it shall be given adequate consideration as the GLO moves forward with the implementation of disaster recovery housing programs.

Comment Received: We also expect for the staff to take particular care of applicants that are having trouble with the process. Whether this requires explaining the program in detail, assisting with the collection of documents, or making follow-up calls on a consistent basis. This includes the elderly and differently abled. This also includes non-English speakers. Every effort should be made to accommodate applicants in this process.

Staff Response: The GLO makes every effort to accommodate applicants in the housing recovery process, including enhanced communications for Limited English Proficiency and non-English-speaking applicants. The GLO's mission is to ensure that every qualified applicant receives the best customer service for housing rehabilitation or reconstruction opportunities.

Comment Received: We believe applicants should be assigned a direct contact at the GLO. this person must have enough knowledge about their applicant that can answer questions with the greatest transparency about the process and status of their file.

Staff Response: The content of this comment and the reasoning behind it shall be given adequate consideration as the GLO moves forward with the implementation of disaster recovery programs.

Comment Received: We would like to see pictures of completed houses, floorplans, and significant options at the beginning of the applicant process.

Staff Response: All eligible homeowners approved for reconstruction must engage in a pre-construction conference with the builder and GLO representatives to review design options and make selections calibrated by the current building codes.

Comment Received: We believe the applicant should be in control of the process as well as the outcome. We demand that every applicant be given evaluation forms to assess the value of the program as well as the work of the contractors and builders.

Staff Response: The content of this comment and the reasoning behind it shall be given adequate consideration as the GLO moves forward with the implementation of disaster recovery programs.

Comment Received: In my professional opinion, part of the reason why the HoAP program helps so many Houstonians is because the team is comprised of Houstonians. Each member of the team is not only familiar with our geography, but also approaches their tasks with a local pride. The City of Houston is one of the most dynamic and diverse cities in the country, and this because of its citizens. By being administered and managed by locals, the extra pride of accomplishment gets us past the challenges of our day, one home purchase at a time.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Homebuyer Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: Regardless of the entity administering the funding, housing programs must target the most vulnerable families and comply with civil rights requirements, including the obligation to affirmatively further fair housing (AFFH).

Staff Response: The GLO is fully committed to ensuring all CDBG-DR funds are administered to impacted communities in a manner that is consistent with federal law. As stated in the Action Plan, all programs and projects will undergo an individual review for AFFH compliance.

Comment Received: Single-Family Homeowner Program: The program must meet or exceed the income proportionality goals set out by the needs assessment and continue to prioritize the lowest-income survivors with the most urgent needs.

Staff Response: The GLO is fully committed to ensuring all CDBG-DR funds are administered to impacted communities in a manner that is consistent with federal law.

Comment Received: Single-Family Homeowner Program: The program should continue to use revenues from multiple funding sources to ensure that homeowners can access the program and fully recover and rebuilt to keep the character of the community.

Staff Response: The GLO remains committed to administering disaster recovery funding allocated by HUD to build back stronger and more resilient communities based on the needs of each individual applicant.

Comment Received: Single-Family Homeowner Program: The homeowner program must comply with the alternatives to clear title provided by Section 2306.188 of the Government Code and GLO Housing Guidelines in order to clear barriers to accessing the program that are more likely to affect Black families and avoid contributing to the wealth and homeownership gaps created by racist housing policies.

Staff Response: The GLO shall give adequate consideration to this comment.

Comment Received: Single-Family Homeowner Program: Contractors must meet Section 3 and MWBE requirements and be strictly held to quality and other standards. Contractors who perform sub-standard work should be removed from the program.

Staff Response: The GLO is fully committed to ensuring all CDBG-DR funds are administered to impacted communities in a manner that is consistent with federal law. The GLO continues to fulfill HUD Section 3 goals as the agency works to build back stronger and more resilient communities. The GLO recovery staff includes a dedicated housing quality assurance team that actively monitors single-family rehabilitation and reconstruction projects; in instances where problems arise, a builder's contract obligations are either reduced or eliminated. The GLO remains dedicated to the highest construction standards and contractor performance.

Comment Received: Multifamily Rental Housing Program: The program must preserve the mandatory distribution of rehabilitated or rebuilt rental units from families at 30% or less of AMFI, 31-50% of AMFI, and 51-80% of AMFI.

Staff Response: The units built under the Multifamily Rental Housing Program are, as required by the applicable federal register, subject to specific land use restriction agreements that reserve those units for use by the LMI population. The GLO remains dedicated to ensuring all multifamily developments meet or exceed the LMI requirements under the law.

Comment Received: Multifamily Rental Housing Program: The program must continue to prioritize applications and projects with a 40-year loan period and LURA. The length of affordability, in addition to the level of affordability, is important to secure an ongoing supply of affordable units.

Staff Response: The GLO is committed to administering the Multifamily Rental Housing Program in compliance with all applicable federal law, including the usage of valid land use restriction agreements.

Comment Received: Multifamily Rental Housing Program: Recovery and resilience are not just about repairing housing and infrastructure, they require rebuilding lives and communities.

Staff Response: The GLO appreciates the content of this comment and remains committed to administering CDBG-DR funds in a manner that best serves the needs of disaster impacted communities.

Comment Received: Multifamily Rental Housing Program: The Multifamily Rental program must continue to incorporate workforce protections that ensure worker safety, ensure economic recovery, and increase resilience.

Staff Response: The GLO is fully committed to ensuring all CDBG-DR funds are administered to impacted communities in a manner that is consistent with federal law. The GLO continues to fulfill all HUD Section 3 goals as the agency works to build back stronger and more resilient communities.

Comment Received: There must be clear and regular communication with the public and with applicants to minimize confusion around any transition, including increased collaboration pursuant to a contract amendment. It is particularly critical that the GLO and HCDD communicated directly with applicants about what is happening and how it affects their application.

Staff Response: The GLO continues to make up-to-date information available on its recovery website, recovery.texas.gov, through press releases, email blasts, and monthly activity briefings to local officials. All active applicants receive status updates as the recovery process moves forward.

Comment Received: The agency administering housing programs must publish monthly data including income and demographic data and the status of all current applications and approved homeowners.

Staff Response: The GLO posts monthly the income and demographic information on its recovery website, recovery.texas.gov for the State-run Housing Assistance Program. The GLO posts monthly the income and demographic information on its recovery website for the State-run Harris County HAP and State-run City of Houston HAP.

Comment Received: The administering agency should notify the public and applicants of changes to processes related to COVID-19, such as remote inspections.

Staff Response: The GLO continues to update communities about the agency's CDBG-DR activities—including the impacts of COVID-19 on the agency's recovery activities--through its recovery website, recovery.texas.gov, email blasts to local officials who in turn disseminate updates to constituents, and press releases. All impacted homeowners engaged in either the HAP or HRP Program application process continue to be served in the current atmosphere of telecommuting, social distancing and face mask mandates. Remote inspections, when practicable, are one important tool in the GLO's toolkit that ensures the recovery process continues to move forward.

Comment Received: The City of Houston and GLO should work out a contract agreement that prevents delays, confusion, and red tape for survivors.

Staff Response: The Texas General Land Office seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure all Hurricane Harvey recovery programs address the needs of Houston residents.

Comment Received: GLO must explain in more detail how the state-run City of Houston Rental Program will affirmatively further fair housing (AFFH) – new affordable units must be built in areas that are safe from flooding, high-opportunity.

Staff Response: All City of Houston Rental Program projects will undergo, as required by federal law, an individual review for AFFH compliance. The Action Plan Amendment 7 cites high opportunity zones as a selection criterion for proposed City of Houston Rental Program projects.

Comment Received: The 15 to 20-year minimum affordability period provided by the state-run program is insufficient compared with the 40-year affordability period incentivized by the City of Houston program.

Staff Response: The GLO recognizes the feedback provided in this comment. The City indicated no interest in maintaining the Multifamily Rental Program when offered. The GLO is fully committed to administering CDBG-DR programs in compliance with federal law.

Comment Received: GLO must guarantee that more units will be available families with incomes at or below 30% AMFI and between 31% and 50% AMFI.

Staff Response: The Amendment 7 cites "target extremely low-income (30 percent AMFI) and exceed the number of LMI units eligibility requirement" as an additional selection criteria for proposed City of Houston Rental Program projects.

Comment Received: GLO needs to explain what will happen to multifamily contracts executed by the City of Houston and approved by GLO that are currently underway.

Staff Response: The GLO recognizes the feedback provided in this comment. It is the intent of the GLO to reimburse the City of Houston for expenses incurred that the GLO deems eligible.

Comment Received: The state-run program must include all workforce protections guaranteed in the city-run program.

Staff Response: The GLO shall give adequate consideration to this comment.

Comment Received: GLO needs to explain in more detail how the project will satisfy AFFH requirements. The GLO should provide funds to homeowners in high-poverty areas to move into areas of high opportunity.

Staff Response: All CDBG-DR projects will undergo an individual review for AFFH compliance as required by federal law.

Comment Received: The program should continue to leverage revenue from multiple sources to ensure that Houstonians can fully recover and are made whole.

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: The program should provide alternatives for clearing title and provide assistance for compliance if necessary.

Staff Response: The GLO recognizes the feedback presented in this comment.

Comment Received: As with the City of Houston Rental Program, GLO must explain what will happen with projects approved by GLO or currently underway.

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: The program must include the benefits provided by the City of Houston Homebuyer Assistance Program.

Staff Response: The GLO recognizes the feedback provided by this comment.

Comment Received: The program and contractors must comply with Section 3 and Minority/Women-owned Business Enterprise requirements.

Staff Response: The GLO recognizes the feedback provided int his comment and, per HUD's requirement for grantees prior to access to awarded CDBG-DR funds, the GLO has certified that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135. In addition, the GLO must comply with applicable procurement requirements that include consideration of Minority/Women-Owned Business Enterprise requirements. The GLO continues to fulfill these HUD requirements as it executes program activities.

Comment Received: GLO must explain how it will communicate with the citizens of Houston regarding the changes to the program, especially applicants to the existing City of Houston programs and low-income residents who have yet to be assisted.

Staff Response: The GLO has and will engaged in marketing and outreach efforts within the City of Houston for Hurricane Harvey housing recovery programs, including emails, texts, door hangers, and postcards.

Comment Received: GLO should allow City of Houston and Harris County residents to be eligible for the Local Buyout and Acquisition program.

Staff Response: The GLO recognizes the feedback presented in this comment. Harris County in partnership with the Harris County Flood Control District administers its own local buyout program.

Comment Received: The Homeowner Reimbursement Program should devote at least 70% of funds to low-moderate income homeowners instead of 5%.

Staff Response: The GLO's projected LMI benefit percentage for HRP was 5 percent. The GLO has exceed this projection and an updated percentage will be declared once all program funds have been expended. As of this writing, the HRP is nearing completion.

Comment Received: Additions in Amendment 7 should have been highlighted in red and additions crossed out so that readers could easily identify changes.

Staff Response: The GLO shall give adequate consideration to the feedback provided in this comment.

Comment Received: GLO needs to explain how it can accomplish this program without a positive working relationship with the City of Houston.

Staff Response: The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure all Hurricane Harvey recovery programs address the needs of Houston residents. In pursuing this goal, the GLO will continue to collaborate with communities in order to best serve impacted Texans.

Comment Received: We ask you to consider continuing to fund the City of Houston's Housing and Community Development Department in the areas of Public Services and Multifamily Development. Their continued partnership and investment is essential to our efforts to end

homelessness and become a resilient city, especially for our community's most vulnerable residents.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Public Services Program and Multifamily Rental Program when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

Comment Received: I am writing to request the Texas General Land Office (GLO) to begin direct allocation of homeowner assistance, multifamily rental and economic revitalization program funds to the City of Houston instead of administering them on behalf of the City.

Staff Response: The GLO recognizes the support for local administration in this comment.

Comment Received: The GLO's administration of these critical HUD programs stops the efforts that we all want—that of local decision-making, transparency, due process and fairness in the recovery and repair of long term multifamily and single-family homes. The City of Houston has solid knowledge of the housing needs of our constituents and is well-qualified to administer the CDBG-DR funds. We appreciate your fair review and consideration of this request and would be happy to discuss the issues we have raised.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The Texas General Land Office will be administering CDBG-DR Harvey funds for all of the city of Houston's housing programs and continue to collaborate with the city to realize program goals.

Comment Received: The City of Houston ("City") strongly opposes the Texas General Land Office's ("GLO") preposterous proposal to eliminate all City-administered CDBG-DR 17 program funding for several reasons.

Staff Response: The GLO recognizes the feedback provided in this comment. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 2024.

Comment Received: The City's programs are better and more appropriate for the citizens of the City than those the GLO has implemented.

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: The GLO's proposed amendment violates the terms of its subrecipient agreement, GLO Contract No. 19-147-001-B489, as amended, with the City (the "Contract").

Staff Response: The GLO recognizes the feedback provided in this comment.

Comment Received: The GLO has demonstrated that it has a difficult time complying with HUD requirements and with establishing and communicating its own bureaucratic and confusing requirements to the City.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO has provided detailed and well-documented instructions to assist the City; however, the City continued to not staff appropriately, overcomplicate its administration of its programs, and failed to respond to the GLO concerns and suggestions.

Comment Received: The City's programs are successful and on schedule by any measure and there is no reasonable rationale for taking away City administration of the programs. Such an action only creates delays and harms the citizens of Houston.

Staff Response: The GLO recognizes the support for local administration provided in this comment. City has failed to meet any of its quarterly schedules for expenditures and demonstrated a lack of progress in its Hurricane Harvey Programs. The lack of progress made by the City, especially in administration of their Homeowner Assistance Program, has required the GLO to step in and administer those funds due to a high risk of funds being deobligated if the HUD expenditure deadline is not met.

Comment Received: The City's CDBG-DR 17 Programs are far superior to the GLO's program by multiple measures. There is simply no reasonable rationale for GLO to determine that the City should not administer programs within Houston City limits.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO is successfully implementing many Hurricane Harvey recovery programs that covered 48 Hurricane Harvey impacted counties. As of the end of June 2020, the State-run HAP has assisted over 1,500 Hurricane Harvey impacted homeowners through the rehabilitation and reconstruction of their homes in time for the 2020 hurricane season. Over 2,600 homeowners who have already received assistance through the GLO's Homeowner Reimbursement Program. For the Affordable Rental Program there are over 4,500 rental units completed or under construction.

The GLO seeks to administer CDBG-DR funds in the most effective and efficient manner possible to ensure all Hurricane Harvey recovery programs address the needs of Houston residents. This action, while not taken lightly, is necessary to ensure the GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 2024.

Comment Received: The GLO is not capable of taking on the additional responsibility of administering additional funds in the City.

Staff Response: The GLO recognizes the feedback provided in this comment. The GLO is successfully implementing many Hurricane Harvey recovery programs that covered 48 Hurricane Harvey impacted counties. As of the end of June 2020, the State-run HAP has assisted over 1,500 Hurricane Harvey impacted homeowners through the rehabilitation and reconstruction of their homes in time for the 2020 hurricane season. Over 2,600 homeowners who have already received assistance through the GLO's Homeowner Reimbursement Program. For the Affordable Rental Program there are over 4,500 rental units completed or under construction.

The GLO has demonstrated its ability to managed multiple recovery programs and grants. The GLO has increased capacity to take on more administration of State-run Hurricane Harvey recovery program for the residents of Houston. This action, while not taken lightly, is necessary to ensure the

GLO, as administrator of state of Texas HUD CDBG-DR funds, provides safe and sanitary housing to the citizens of Houston before the HUD funding terminates in August 2024.

Comment Received: I believe city of Houston is doing a good job getting funds out to the public. The down payment program is working well and I believe a change in the program would be the death of program.

Staff Response: The GLO recognizes the support for local administration provided in this comment. The GLO agrees the City of Houston has the capacity to maintain the Downpayment (Homebuyer) Assistance Program and others when they are not responsible for managing the Homeowner Assistance rehabilitation and reconstruction programs and offered for the City maintain this program in the April 22, 2020 letter. The City indicated no interest in maintaining the offered programs.

State of Texas Plan for Disaster Recovery: Amendment 6

Amendment 6 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on March 10, 2020, commencing the required 30-day public comment period. The Amendment was posted on the GLO websites. The public comment period for the document ran to April 8, 2020. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name		Individual, County, City or Organization
Last	First	
Byford	Cora	Private Individual

The following is a summary of the comments received as well as the response.

Comment Received: The sole purpose of Public Service Activities under the HAP Program was to prevent homelessness including the following three things: 1. Help with mortgage up to 10,000 dollars 2. Rental Assistance up to 24 months [the State Action Plan cites up to 3 months of rental assistance, not 24 months] 3. Help with utilities up to 1,000 dollars. Because this Amendment is deleting the Public Services Activities, I will not be able to get assistance with my delinquent mortgage.

In addition to other problems with State of Texas Action Plan, someone should be checking on inspections done on these homes that were repaired: an inspection report on my home indicated repairs that had not been done.

Staff Response: Amendment 6 of the State of Texas Plan for Disaster Recovery (APA6) does not delete the public services activities under the HAP Program. APA6 only reallocates an explicit reserve fund for the public service activities to a HAP oversubscribed region. The public services activities remain available for eligible applicants who qualify. With respect to single family housing inspection concerns, the GLO recognizes this comment and will give its content adequate consideration as the agency continues to ensure that all CDBG-DR activities are executed properly.

Amendment 3 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on March 22, 2019, commencing the required 30-day public comment period. The Amendment was posted on the GLO websites. The public comment period for the document ran to April 20, 2019. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those that submitted comments:

Name		**Individual, County, City or Organization**
Last	**First**	
Bocox	Mary Ann	Private Individual
Smith	Jerry D.	Private Individual
James	Carolyn	Private Individual
Rener	Amy	Private Individual
Tindall	Mamie	City of Houston
Zummo	Rachel	Texas Rio Grande Legal Aid
Parsons	David	City of Port Aransas
Odon	Chad	Private Individual
Smith	Nancy	Private Individual
Shelton	Jimmy	Private Individual
Lyssy	Vern	Private Individual
Sandy	Kaddie	Private Individual
Ward	Jim	Private Individual
Smith	Konner	Private Individual
Chaka	Lola	Private Individual
Harriss	Melodie	Private Individual
Guinn	Gail	Private Individual
Lurker	Lance	Private Individual
Sloan	Maddie	Texas Appleseed

The following is a summary of the comments received as well as the response.

Comment Received: Regarding Section 5.1, State Administered Disaster Recovery Program, the usage of declined or deobligated buyout and acquisition funds to produce additional affordable rental properties is appropriate. However, the reallocation of infrastructure funds should take place through a MOD Amendment with a public comment process. The SETRPC MOD itself was not based on the required unmet need criteria and all funds should initially go to underfunded areas and address actual unmet need.

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: [Regarding Section 5.2, Harris County Administered Disaster Recovery Program] It is not clear whether the recapture amount for the single-family new construction period is prorated. Based on the language, we assume that the amount recaptured from the homeowner will be down payment assistance only, and will be pro-rated over the 10-year affordability period, but the specifics of resale and recapture need to be described in the Action Plan per 83 FR 40314.

Response from Harris County: Harris County has per 83 FR 40314 established a recapture policy for the Single-family New Construction program. The recapture policy is detailed in Harris County's the Single-family New Construction program Guidelines, which can be found at Harris County recovery website at https://harrisrecovery.org/guidelines/.

The homebuyer must occupy the home as his/her principal residence throughout the affordability period. Recapture, under the CDBG-DR guidelines, Federal Register 82 FR 61320, Vol. 82, No. 247, 83 FR 5844, Vol. 83, No. 28, and per HOME Final Program Rule 24 CFR 92, is triggered by any transfer of ownership, either voluntary or involuntary, during the established CDBG-DR period of affordability. These requirements are outlined in a written agreement between the homebuyer and Harris County and enforced via lien on the property. The County recaptures the full amount of the direct CDBG-DR subsidy to the homebuyer when there is a voluntary or involuntary transfer of the property before the period of affordability is complete, provided that the net proceeds are greater than or equal to the full amount of the direct CDBG-DR subsidy to the homebuyer.

- If the net proceeds from the sale of the home are not sufficient to recapture the full CDBG-DR subsidy loan amount, Harris County will collect only what is available from net proceeds. The amount recaptured will never exceed the net proceeds.

- To ensure awareness of the recapture requirements involved in receiving a CDBG-DR subsidy loan through the CDBG-DR New Single-Family New Construction Program and CDBG-DR Downpayment Assistance Program, Harris County staff will meet with all applicants and discuss the recapture provision, written agreement, Deed of Trust, and Loan Note.

Comment Received: [Regarding Section 5.3 City of Houston Administered Disaster Recovery Program] Because the City has chosen much longer lien periods than required by the FR notice, we recommend the inclusion of an alternative option for homeowners, for example an agreement to resell to another LMI homeowner at an affordable price, or the option for heirs to take over the lien, as is provided in the Single Family Development Program. Such alternative would prevent the loss of affordability and preserve and build wealth in low-income families and communities.

Response from the City of Houston: HUD requires that the City of Houston select either the resale or recapture method when setting up programs. The selected method must be used across the board with all programs and cannot distinguish between Urgent Need and Low and Moderate Income (LMI) homeowners. While the City has opted to use the recapture method, we are allowing for heirs to continue to live in the property and transfer the lien.

Comment Received: The City has already included an option for the heirs to take over the lien and compliance periods if the homeowner dies during the compliance period in the Single Family Development Program, it should also include an option such as conveying the property to another LMI homeowner at an affordable price to preserve affordability in the neighborhood.

Response from the City of Houston: Please see the above response.

Comment Received: We remind the City that the location of lots for Single Family Development Program must comply with fair housing requirements.

Response from the City of Houston: The City is aware of fair housing requirements and will be taking this into consideration as we begin acquiring property.

Comment Received: A 20-year minimum lien period for reconstruction for the Multifamily Rental Program is appropriate, and the City should incentivize longer affordability periods.

Response from the City of Houston: The City has incentivized a 40 year affordability period within its recent NOFA for multifamily properties.

Comment Received: There is not a clear explanation of why the City has chosen to use the Low-Income Housing Credit rent limits, 26 U.S. Code§ 42 (g)(2)(a), instead of High HOME rents in the Multifamily Rental Program. This explanation should be included in order to enable the public to provide responsive comments.

Response from the City of Houston: The High HOME rents target affordability for households to 65% of AMI, but does not for Extremely Low Income and Very Low Income households that include those below 30% of AMI and 30% -50% AMI. HCDD used the Section 42 rent index to clearly identify targeting to these households which developers and housing providers were already familiar with.

Comment Received: The Small Rental Program should include income proportionality requirements. Landlords will be receiving assistance on income-producing property on the same terms as homeowners; they should be providing affordability on the same terms in order for the program to avoid replacing affordable housing with less affordable housing.

Response from the City of Houston: Landlords receiving assistance through the Small Rental Program will all have affordability requirements. The City will monitor compliance to ensure the continued affordability of housing assisted with disaster recovery funding.

Comment Received: A buyout program that provides additional assistance to LMI homeowners in order to ensure that they can move to safer areas is critical, and we appreciate that the City of Houston's buyout program include these kinds of incentives and assistance. However, the language of the Action Plan appears to say that such assistance is capped at $31,000 over the post-disaster fair market value of the home, which would leave homeowners in the areas most in need of buyouts -including areas where repeat flooding and proximity to environmental hazards have depressed property values -with the least amount of assistance that may be inadequate to enable them to move. These homeowners should be eligible for the maximum amount of assistance.

Response from the City of Houston: At this time, HCDD is in development of its buyout guidelines that will be released later this year. HCDD is currently developing a multifamily buyout strategy to offer post-storm value to existing property owners. The program would also include relocation assistance to relocate eligible households out of the floodplain and floodway.

Comment Received: It is unclear how the addition of two national objectives will affect the Economic Revitalization Program. Any job training and job creation incentives must be directed towards LMI residents of disaster-affected neighborhoods. This also aligns with the City's required Section 3 compliance.

Response from the City of Houston: The City will target funding for LMI communities (specifically the Complete Communities). We will also focus on programs and service that support small businesses that employ or will hire LMI employees. Programs currently under development are: Access to Capital- lending; Facade Improvements- grants; and Business Innovation - lending and grants.

Comment Received: This City's commitment to planning activities that "will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account future possible extreme weather events and other natural hazards and long-term risks" is correct. We particularly appreciate both the City's commitment to community engagement in planning, and to using a post-disaster evaluation of hazard risks.

Response from the City of Houston: Thank you for your comment.

Comment Received: Citizen Participation Houston Local Action Plan: There were no identifiable changed from the language of Amendment Two to the Action Plan to the language of Amendment Three of the Action Plan. Please identify which changes have been made, if any.

Response from the City of Houston: The City removed language about the Local Action Plan amendment process as the amendment process for Houston's sections is now incorporated into the State's Action Plan process.

Comment Received: My home has been mortgage free for more than fifty years prior to Harvey. Because of the damage sustained, I am now thousands of dollars in debt related to financing repairs. I propose $136.5 million be made available for homeowner reimbursement of repairs with any remaining funds allocated to Harris County and Houston for social programs.

Staff Response: The Texas General Land Office recognizes the unique issues presented to Texans in the face of recovering from a disaster. It remains the goal of the agency to ensure that all Texans have access to an effective and efficient disaster recovery through a diverse group of recovery programs and policies.

Response from the City of Houston: Thank you for your thoughtful input regarding the Harvey State Action Plan's Third Amendment. The City of Houston Housing and Community Development Department (HCDD) appreciates your input and has given consideration to your comments. As currently structured in the proposed Amendment, over 88% of all funding is set aside for housing programs to assist those affected by Hurricane Harvey. The Homeowner Assistance Program is funded at a level of $427,900,063 and includes a Reimbursement Program that provides assistance to homeowners that have incurred expenses to repair their homes.

Comment Received: It is requested that a portion of the $37.6 million dollars reallocated to the Multi-Family Affordable Housing projects be allocated to projects that were erroneously issued a conditional letter of award in Fall of 2018.

Staff Response: The Texas General Land Office shall give this comment adequate consideration as it moves forward with utilizing the reallocated funding.

Comment Received: Obtaining disaster recovery assistance has been complex and I am unsure of whether or not I am approved to receive grant funding.

Staff Response: The Texas General Land Office remains committed to ensuring all Texans have access to the resources they need to achieve an effective and efficient recovery process. Any citizens who may be having difficulties in navigating programs are strongly encouraged to reach out to the GLO directly for support in resolving those issues.

Comment Received: It is time to get people back into their homes, let's get the ball rolling. Comment made in full support of Amendment 3.

Staff Response: The Texas General Land Office appreciates the support of this comment and shall continue to work to provide the most comprehensive disaster recovery process possible.

Comment Received: The Commissioners Court of Harris County, Texas approves and supports the amended State of Texas Action Plan for Hurricane Harvey Round 1 CDBG-DR funding Amendment #3 by the Texas General Land Office.

Staff Response: The Texas General Land Office appreciates the support of this comment and shall continue to work to provide the most comprehensive disaster recovery process possible.

Comment Received: The changes made in Amendment 3 do not meet the needs of impacted renter households. The FEMA Verified Loss threshold to determined unmet need for renters does not properly address the unique challenges faced by renters. As a result, the vast majority of renters (which reflect 50% of FEMA applicant households) are not qualified to receive the assistance necessary to recover.

Staff Response: The Texas General Land Office recognizes the unique issues faced by impacted renter households and has worked to utilize other data, like the Social Vulnerability Index, to provide the most wholistic view of need possible. The GLO remains committed to exploring other means of analysis to address issues like those brought up in this comment.

Comment Received: The City of Port of Aransas is requesting an amended to the State Action Plan that would permit the city to keep funding that has been awarded specifically for Local Buyouts, Acquisitions, and Infrastructure and apply those funds to the Affordable Housing Program.

Staff Response: The Texas General Land Office shall, in the manner deemed best for fostering an efficient and effective recovery process, consider the reallocation of funds as circumstance allow. This comment will be given adequate consideration as the GLO moves forward with the disaster recovery process.

Comment Received: The way in which the GLO has allocated the Round 2 $200 million in funding has completely neglected the HUD designated most impacted and distressed areas. Why did HGAC-West have a 13% drop in funding from Round 1?

Staff Response: The Texas General Land Office, in determining a method of distribution among the HUD designated most impacted and distressed areas, considers the most up-to-date relevant data. The result of these considerations are detailed and explained in the Action Plan.

Comment Received: Relying on FEMA data by county to assess Renter Unmet Needs does not accurately account for the impact on The City of Wharton.

Staff Response: The Texas General Land Office recognizes the unique issues faced by impacted renter households and has worked to utilize other data, like the Social Vulnerability Index, to provide the most wholistic view of need possible. The GLO remains committed to exploring other means of analysis to address issues like those brought up in this comment.

Comment Received: By not considering the proportion of total housing stock effected in a given area, the distribution of funding is inequitable and disadvantageous to smaller communities. The Round 2 MOD should be reassessed and the Round 3 MOD should be updated.

Staff Response: A central part of funding distribution for the Affordable Rental Program is the GLO's methodology for determining remaining unmet need. This methodology must take into consideration specific damage for pre-storm housing stock to ensure current MODs are working to address remaining unmet needs for housing replacement. By using this formula, the GLO is helping

communities address housing needs proportionate to their overall housing inventory damaged during Hurricane Harvey.

Comment Received: The GLO should publish the detailed data and methodology used in creating summary charts to inform their MODs in the Action Plan.

Staff Response: The formula and method of distribution were fully disclosed in the State Action Plan Amendment 2 that was published and underwent a full public comment period. This methodology can be found on page 61 of the Action Plan and viewed online at recovery.texas.gov.

Comment Received: The GLO has changed policy in requiring all scattered site projects to be 100% LMI and this impacts communities in that it excludes anyone who isn't LMI from qualifying to live in rental units in their communities.

Staff Response: The Texas General Land Office remains committed to ensuring all disaster recovery programs are administered in a manner that is compliant with all applicable federal law. In this instance, 24 CFR §570.208(a)(3) controls and requires that 51% of any given housing structure be reserved for LMI usage.

Comment Received: $200 million in federal funds have been inequitably distributed in the last month, dramatically impairing housing recovery in Port Lavaca.

Staff Response: A central part of funding distribution for the Affordable Rental Program is the GLO's methodology for determining remaining unmet need. This methodology must take into consideration specific damage for pre-storm housing stock to ensure current MODs are working to address remaining unmet needs for housing replacement. By using this formula, the GLO is helping communities address housing needs proportionate to their overall housing inventory damaged during Hurricane Harvey. All information regarding MOD calculations can be found at recovery.texas.gov and on page 61 of the Action Plan.

Comment Received: Round 2 Method of Distribution allocated 90% of total funds to only 9 counties and 2 COGs.

Staff Response: The formula for and final method of distribution were fully disclosed in the State Action Plan Amendment 2 that was published and underwent a full public comment period. This methodology can be found on page 61 of the Action Plan and viewed online at recovery.texas.gov.

Comment Received: The GLO should go beyond data analysis in forming the Affordable Rental Program Round 3 MOD. This should include consultations with stakeholders, citizens, and local governments.

Staff Response: All CDBG-DR Programs require, per federal law, a robust citizen participation process to ensure all relevant stakeholders are consulted throughout the disaster recovery process. This requirement is satisfied through the solicitation of public comments, consultation with local governments and citizens, and other outreach programs.

Comment Received: We request that $37.6 million be moved to the Affordable Rental Housing fund to help the housing shortage in Calhoun County and Port Lavaca.

Staff Response: The Texas General Land Office shall, in the manner deemed best for fostering an efficient and effective recovery process, consider the reallocation of funds as circumstance allow. This comment will be given adequate consideration as the GLO moves forward with the disaster recovery process.

Comment Received: The GLO should confirm that it did not accept applications during each of the 3 priority funding times that did not meet the GLO-provided description of Rehab, Recon, or New Construction. The GLO should also affirm that applications where no existing unrepaired Harvey damage was document were rejected under the first 2 rounds of funding.

Staff Response: The Texas General Land Office, in processing applications for its programs, adheres to all established policies and procedures. This compliance is inclusive of any and all Multifamily Programs.

Comment Received: The Renter Unmet Need formula is based on a standard number methodology that doesn't take into consideration proportionate impact and, as a result, skews the true impact of losses.

Staff Response: The Texas General Land Office recognizes the unique issues faced by impacted renter households and has worked to utilize other data, like the Social Vulnerability Index, to provide the most wholistic view of need possible. The GLO remains committed to exploring other means of analysis to address issues like those brought up in this comment.

Comment Received: Can we get clarification as to why the Yoakum project was accepted by the GLO when it had very little damage from the storm? We ask that the GLO affirm that applications with no existing Harvey damage were properly rejected under the first two rounds of funding and only approved under the New Construction application submission period. We ask that the GLO rescind all conditional letters of award issued in Round 2 and that didn't follow Round 1 criteria and fund all three Port Lavaca projects.

Staff Response: The Texas General Land Office, in processing applications for its programs, adheres to all established policies and procedures. This compliance is inclusive of any and all Multifamily Programs.

Comment Received: The GLO allocated 90% of Round 2 funds to 9 counties and 2 COGs. The GLO should include more than summary charts in providing reasoning for this allocation and should post a link to supporting data, calculation, and methodologies.

Staff Response: A central part of funding distribution for the Affordable Rental Program is the GLO's methodology for determining remaining unmet need. This methodology must take into consideration specific damage for pre-storm housing stock to ensure current MODs are working to address remaining unmet needs for housing replacement. By using this formula, the GLO is helping communities address housing needs proportionate to their overall housing inventory damaged during Hurricane Harvey. All information regarding MOD calculations can be found at recovery.texas.gov and on page 61 of the Action Plan.

Comment Received: The Action Plan only contains summary charts, tables, and maps and fails to provide background data and calculations. The GLO should 'show its work'.

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: Port Lavaca is in dire need of affordable housing! ***(Multiple respondents provided this feedback.)***

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: There is an absolute need for rental properties in Port Lavaca as much of the labor force in the city has to live elsewhere because housing is not currently available.

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: Port Lavaca is in dire need of affordable housing! All of our young people have jobs locally, but no place to live. Please help our declining little town keep our young kids local.

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: Port Lavaca is in need of housing. I have been looking for an affordable place to live and there is nothing available.

Staff Response: The Texas General Land Office appreciates this comment and shall give it adequate consideration moving forward.

Comment Received: The GLO has changed policy in requiring all scattered site projects to be 100% LMI and this impacts communities in that it excludes anyone who isn't LMI from qualifying to live in rental units in their communities.

Staff Response: The Texas General Land Office remains committed to ensuring all disaster recovery programs are administered in a manner that is compliant with all applicable federal law. In this instance, 24 CFR §570.208(a)(3) controls and requires that 51% of any given housing structure be reserved for LMI usage.

Amendment 2 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on November 19, 2018, commencing the required 30-day public comment period. The Amendment was posted on the GLO websites. The public comment period for the document ran to December 19, 2018. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those who submitted comments:

Name		Individual, County, City or Organization
Last	**First**	
Sloan Sangueza	Madison Tony	Texas Appleseed
Turner	The Honorable Mayor Sylvester	City of Houston
Zummo Nathan	Rachel Alexi	Texas RioGrande Legal Aid, Inc.

The following is a summary of the comments received as well as the response.

Comment Received: Amendment 2 should not reduce the affordability period for rehabilitated and reconstructed multifamily properties from twenty to fifteen years.

Staff Response: The Texas General Land Office, in its commitment to implementing disaster recovery programs within the bounds of federal law, designs programs and policies that comply with the most currently issued guidance. In this case, the Federal Register notice associated with Amendment 2 presents the following acceptable modifications to housing affordability periods:

a) For the rehabilitation or reconstruction of multi-family rental projects with eight or more units, the minimum affordability period shall be fifteen (15) years.

b) For the new construction of multi-family rental projects with five or more units, the minimum affordability period shall be twenty (20) years.

The Texas General Land Office has, as permitted under federal law, modified its housing affordability periods to be in line with the most recently updated federal requirements.

Comment Received: Amendment 2 should provide metrics or guidelines to ensure that the Local Infrastructure Program, the Homeowner Assistance Program, and Planning activities meet the additional requirements established by the Federal Register.

Staff Response: The Texas General Land Office is in the process of developing specific policies and procedures to comply with the additional requirements presented under the Federal Register published August 14, 2018. This includes developing policies and procedures to assess cost-effectiveness of assisted housing rehabilitation and reconstruction projects and ensuring Local Infrastructure Programs and Planning Activities align with all presented criteria

Comment Received: The State should continue using the most recent information available to inform its disaster recovery programs.

Staff Response: The Texas General Land Office remains committed to utilizing the most up-to-date data in the formation and implementation of all disaster recovery programs to ensure the best use of limited recovery dollars.

Comment Received: The Affordable Rental Program is still inadequate to meet the unmet needs of displaced renters.

Staff Response: The Texas General Land Office recognizes the potential for analytical gaps that may exists when utilizing one data set over another in determining unmet need. To combat this, the GLO has also utilized the Social Vulnerability Index to supplement the unmet needs analysis of disaster areas.

It also deserves noting that each property in the Affordable Rental Program must, as a condition of program participation, reserve a percentage of the units for usage by the LMI population in the area. Each development must also participate in an Affirmative Marketing Plan that function to specifically target vulnerable populations in the area to ensure affordable units are marketed to those least likely to apply for those units. As the GLO completes necessary underwriting of applications it may become possible to fund additional units.

It should be noted that although these housing developments and their corresponding marketing plans do not specifically target Harvey survivors, they do present an increase in the overall availability and quality of affordable housing stock in the area.

Comment Received: The State should conduct more consultation with citizens, in addition to their consultation with stakeholders and local governments, to determine updates to local needs assessments.

Staff Response: The Texas General Land Office has prioritized citizen participation throughout the Hurricane Harvey recovery process. This consultation process has included ongoing and consistent dialogues with affected citizens, stakeholders, local governments, long term recovery groups, and public housing authorities to ensure that the disaster recovery process is specifically tailored to the individualized needs of each community.

Although the GLO collaborates with local officials in guiding the formation and implementation of disaster recovery programs, many projects are also statutorily required to undergo public comment throughout the life of the project. The GLO remains committed to ensuring citizens remain a viable part of the disaster recovery process.

Comment Received: We would like to reiterate our previous comments that the State, and not regional or local governments, should be responsible for long-term planning.

Staff Response: The State recognizes this feedback and is committed to ensuring that all public comments, previously submitted or otherwise, are given adequate consideration as Hurricane Harvey recovery continues. Communities may choose to utilize portions of their infrastructure and buyout

and acquisition funds for local planning needs but the planning allocation set aside in the Action Plan will be administered directly by the GLO.

Comment Received: We continue to express concerns regarding the distribution methodology utilized in the State's Action Plan. Particularly, we remain concerned that the FEMA data utilized systematically undercounts the unmet needs of renters and low-income families.

Staff Response: The Texas General Land Office remains committed to utilizing the most current data available in assessing damage and unmet need in disaster areas. To date, the GLO has incorporated historically utilized FEMA data into these calculations and, in addition to these data sets, has utilized the Social Vulnerability Index in an effort to develop the most wholistic view of need following Hurricane Harvey.

The GLO recognizes the issues that may be associated with analyzing one collection of data over another and remains open to exploring processes and policies that incorporate reliable and accurate data sets to develop the most effective recovery process possible.

Comment Received: We would also like to note that using FEMA damage severity categories almost certainly underestimated unmet need in low- and moderate-income areas. It should be noted that these homeowners likely did not have resources to make immediate repairs to their homes a year ago (when the damage assessments were performed). The delay in repairs is likely translate into many of these homes needing to be reconstructed (as opposed to repaired) as damage has compounded over time.

Staff Response: The Texas General Land Office recognizes the validity of the content of this comment and shall give it adequate consideration as programs progress. It should be noted that the GLO remains committed to utilizing lessons learned from prior grant administration to ensure all programs and policies continually evolve in a manner that presents the most benefit to disaster victims.

Additionally, applicants are not limited in their application to programs if they have less damage utilizing the FEMA damage assessment methodology. Eligibility must include a remaining unmet need with consideration for any other sources of funds and repairs already completed. The program is also committed to bringing any homes repaired or reconstructed up to housing quality standards and local code and zoning.

Comment Received: We would like to applaud the State on the following: a. The State is correctly using construction costs for a new unit of rental housing rather than FEMA's estimated personal property loss to estimate unmet need for affordable rental housing, and b. The State's use of the Social Vulnerability Index (SoVI) to evaluate unmet need; however, the State must ensure that funding based on SoVI actually reach the socially vulnerable areas.

Staff Response: The Texas General Land Office agrees that the damage-based data sets HUD must use to compare states to one another is limited in its strength to allocate funds to regional and local needs. By utilizing both per capita damage and the SoVI the formula as well as FEMA and SBA damage estimates the GLO can consider a community and private applicants' ability to recover from other resources.

Comment Received: We appreciate that there will be policies and processes for assessing cost-effectiveness and we look forward to seeing these develop.

The Texas General Land Office remains committed to implementing disaster recovery programs in a manner that satisfies all requirements under federal law. This commitment includes ensuring there are policies and procedures in place that accurately access a cost-effectiveness analysis for projects utilizing CDBG-DR funds.

Comment Received: We fully agree that consultation with 'affected citizens' is critical to the development of needs assessments.

The Texas General Land Office remains committed to developing disaster recovery policies and procedures which accurately address the individualized needs of each impacted community. In order to achieve this goal, consultation with impacted local governments, officials, and citizens is required.

Comment Received: We would like to continue to emphasize the importance of consideration future possible extreme weather events and other natural hazards in long-term planning.

All CDBG-DR funded programs and projects administered by the GLO work to ensure an effective disaster recovery that fosters more resilient communities. This principle is inclusive of cognizant planning that gives adequate consideration to the potential for the future impact of extreme weather events or other natural hazards. All projects constructed are built to green and more resilient standards which has shown from previous recovery to affect the projects ability to withstand future events.

Comment Received: We agree that planning activities must promote sound, sustainable, long-term recovery planning and would like to emphasize that land-use decisions must take non-natural hazards and long-term risks into account as well.

The GLO recognizes the validity of this comment and shall give it adequate consideration as programs involving land-use decisions develop. As a part of federally required environmental clearances the GLO considers the built environment and any known hazards as a part of program eligibility and design.

Comment Received: We agree that the use of eminent domain powers must not benefit private parties, but must be utilized in a manner that results in public use that reduces disaster risk.

The GLO will be allowing local communities to utilize eminent domain authorities as they see fit in their recovery**.**

Comment Received: The State should not reduce the affordability period for rehabilitation and reconstruction in the Affordable Multifamily Program. The Federal Register does establish minimum affordability periods, but does not prevent the State from extending those period.

The Texas General Land Office remains committed to ensuring that all disaster recovery programs are implemented in compliance with all applicable federal law. To date, applicable federal law establishes a minimum affordability period of fifteen (15) years and it is the commitment of the GLO to enforcing that provision

Comment Received: We agree with the language specifying the requirements for Local Infrastructure Program projects.

Comment Received: We agree with the requirement language presented for Planning Activities and believe that jurisdictions that conduct or participate in a comprehensive Assessment of Fair Housing will be best positioned to conduct effective planning.

Comment Received: The Method of Distribution completed by The South East Texas Regional Planning Commission (SETRPC) does not comply with the State's Action Plan, MOD Guidelines, Federal Register Notice, or required civil rights certifications: a. SETRPC based its suballocation of funds solely on an undefined distribution factor it called 'storm impact'. Although certain data sources were listed, it was not explained how these sources were used to arrive at any particular breakdown of 'impact' by local jurisdiction, b. After further information was provided to Texas Housers, it was determined that 'storm impact' was determined by the development of a regional representation of water heights using inundation maps created by FEMA after Harvey. This confirms that SETRPC allocated funds based solely on level of inundation and total population in the inundated area without considering unmet need, ability to recover, or the relative population of the impacted area, and c. SETRPC's method of distribution fails to include the required plan to facilitate meeting the 70% low- and moderate-income requirement.

Staff Response: The GLO will review this Method of Distribution again to ensure all requirements were met in its development. It should be mentioned that any allocations made from the MOD still must comply with the requirement for 70% of the projects funds being spent on LMI eligible activities, that the project have a direct tie back to Hurricane Harvey and a remaining unmet need.

Comment Received: We appreciate the GLO's work and ongoing commitment to efficient and equitable disaster recovery.

Comment Received: The City of Houston believes that the GLO, in keeping with the intent of the Federal Register to ensure consistency across allocations for the same qualifying disasters, should utilize the same methods for estimating unmet need for this allocation as it did for the prior allocation. In using this formula, The City of Houston should receive a fourth of the total funds under this amendment (about $162.5 million) to provide the most effective use of funds in addressing the extensive unmet need that exists in Houston.

Staff Response: Please remember that the GLO is responsible for the allocation of funds to the entire impact area and must consider datasets that are representative of that whole area. The Texas General Land Office recognizes the incredibly devastating impact that Hurricane Harvey had on the City of Houston and its citizens and, as a result, remains committed to fostering the most effective and efficient recovery possible from the very limited funds provided to the State. The content of this comment and the reasoning behind it shall be given adequate consideration as the GLO moves forward with the implementation of disaster recovery programs.

Amendment 1 to the State of Texas Plan for Disaster Recovery: Hurricane Harvey — Round 1 (the Amendment) was released on September 7, 2018, commencing the required 30-day public comment period. The Amendment was posted on the GLO websites. The public comment period for the document ran to October 6, 2018. The GLO distributed a statewide press release announcing the availability of the Amendment on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities, and other interested parties.

List of those that submitted comments:

Name		**Individual, County, City or Organization**
Last	**First**	
Cutts	Dana	Private Individual
Gallo	Sandy	PEG, LLC.
Gary	Aaron	Tempo Partners
Gonzalez	Jose Carlos	Gonzalez & Associated Homeland Security Resource Allocation Consulting
Luzier	Michael	Home Innovation Research Labs
Nathan Rainey Richards Zummo	Alexi Kate Jennifer Rachel	Texas Rio Grande Legal Aid
Muñoz	Ned	Texas Association of Builders
Reinhardt	Chris	Private Individual
Shiyou-Woodard	Julie	Smart Home America
Sitter	Paula	Private Individual
Toole	Jaclyn	National Association of Home Builders

The following is a summary of the comments received as well as the response.

Comment Received: 1. Will any of these funds be allocated for the repair of yard damage including landscaping, trees, fencing, etc.?; 2. Will rental costs paid while waiting for homes to be made livable again be an eligible use of funds?; and 3. Will any of these funds be allocated to cover the costs associated with living in FEMA approved hotels, cost of restaurant meals, and other living expenses?

Staff Response: Community Development Block Grant for Disaster Recovery funds must be utilized in a manner that complies with all applicable federal laws and regulations. Activities deemed eligible for funding may be located first in federal law and second in individual program rules and regulations.

Comment Received: 1. The National Association of Home Builders applauds the GLO's inclusive of industry-recognized green building standards in the Action Plan; and 2. The National Association of Home Builders supports policy for voluntary green building programs as it provides flexibility to builders and developers without compromising rigor.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

Comment Received: Home Innovation Research Labs supports the Texas General Land Office's proposed amendment to the Texas State Action Plan which recognizes ICC/ASHRAE-700 National Green Building Standard (NGBS) as a compliance method for the HUD requirement that buildings seeking funding comply with green building standards.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

Comment Received: PEG and Home Innovation Research Labs support the Texas General Land Office's proposed amendment to the Texas State Action Plan recognizing ICC/ASHRAE-700 National Green Building Standard (NGBS) as a compliance method for the HUD requirement that buildings seeking funding comply with green building standards.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs works in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

Comment Received: I am in support of the revisions to the State Action Plan that change the Quality Construction Standards to recognize multiple certification programs such as ENERGY STAR, Enterprise Green Communities, LEED, and ICC-700 National Green Building Standard. The initial language contained within the State Action Plan restricted recognition to ENERGY STAR and was not competitive.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

Comment Received: 1. Resiliency in Texas generally, and Houston in particular, could be aided tremendously by the expansion of Medicaid; 2. AMI should be increased to 95%; 3. Disbursement of CDBG-DR funds should not be allowed for those seeking settlement from lawsuits against the Army Corps; and 4. Increase focus on citizen participation from the areas with the largest unmet needs.

Staff Response: The Texas General Land Office (GLO) is the primarily agency charged with the administration of Community Development Block Grant for Disaster Recovery Funds. Our agency has no authority over nor do we participate in any processes that may influence the expansion of Medicaid in the State of Texas.

The GLO remains committed to administering CDBG-DR funds in a manner that complies with all current federal law and regulation. Absent a HUD directive or federal law to the contrary, the GLO does not retain the authority to adjust AMI percentages nor do we retain authority to make CDBG-DR eligibility standards beyond what is in accordance with current law.

The GLO has and will continue to conduct robust citizen participation processes in accordance with HUD requirements for all programs and areas associated with CDBG-DR funds.

Comment Received: 1. The Texas Association of Builders (TAB) commends the GLO for including all of the green building program options listed by the U.S. Department of Housing and Urban Development in the Amendment I of the State Action Plan for Community Development Block Grant for Disaster Recovery funds; and 2. TAB respectfully requests that the GLO also add Houston's green building program, Green Built Gulf Coast, to the list of industry-recognized standards listed in Addendum 1. The inclusion of this standard is logical and adds a greater level of flexibility for builders in our region without compromising rigor.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs works in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

The GLO shall give the suggestion of adding Houston's green building program, Green Built Gulf Coast, to the list of industry-recognized standards adequate consideration.

Comment Received: No money should go to those properties that were rental properties or to properties owned by some entity other than a homeowner at the time of the flood event.

Staff Response: The disposition of Community Development Block Grant funds allocated for Disaster Recovery purposes is governed by the rules and regulations set by the U.S. Department of Housing and Urban Development through the publication of the Federal Register notice. The GLO remains committed to ensuring that all CDBG-DR funds are administered in a manner that is consistent with all Federal Register guidelines and applicable federal law.

Comment Received: 1. Smart Home America commends the GLO on its inclusion of the IBHS Fortified Home resilient construction standards in the Hurricane Harvey Housing Design Guidelines; 2. Smart Home America would also recommend the GLO consider inclusion of the IBHS Fortified Home resilient construction standards directly in the State of Texas Plan for Disaster Recovery as a quality construction standard; and 3. The addition of FORTIFIED Home guidelines to the Action Plan should include the following language: 'A Certificate of Compliance issued as a part of the chosen standard's compliance process will be required to be submitted as proof of compliance'.

Staff Response: The Texas General Land Office remains committed to ensuring Texas recovery efforts align with the most effective and efficient building standards currently accepted within a given industry. The inclusion of multiple green building programs works in the State Action Plan Amendment 1 is intended to provide flexibility for funds while maintaining the highest standards.

Comment Received: I am 65 years old and disabled. When Harvey hit, the apartment complex in which I was living, operated by The Houston Housing Authority, gave residents five days to vacate the premises. These evictions were put on hold by Mayor Turner and Houston Housing Authority was able to provide moving help in the form of man power and supplies. Many of the disabled residents of my residence that was damaged by Harvey were moved into non-ADA units and now, because the owner of these units is unwilling to renovate to meet our ADA needs, are being moved again. Bottomline: I want to ensure that there is adequate oversight and accountability for the processing of all the funds allocated to Houston. Please make sure that ADA requirements are actually met in seeing that all complexes built are up to current ADA code and regulation, including walk-in or roll-in showers for any senior living facilities.

Staff Response: All funds allocated as Community Development Block Grants for Disaster Recovery in relation to Hurricane Harvey must, in accordance with federal law, meet specific accessibility and fair housing standards. The Texas General Land Office remains committed to ensuring that all funds are utilized in a manner consistent with federal law.

Comment Received: The City of Houston and Harris County allowed more robust public engagement than did the State, raising equity issues.

Staff Response: The Texas General Land Office is committed to ensuring all disaster recovery programs are administered in a manner that balances active engagement with impacted communities with the expediency required for disaster recovery response. Given the severity and widespread immediate aftermath of Hurricane Harvey, the U.S. Department of Housing and Urban Development saw it fit to permit streamlined requirements for public comment that did not mandate public hearings, but did mandate a minimum public comment period of not less than thirty days. The GLO utilized this streamlined requirement as it was deemed reasonable under federal law.

Comment Received: By prioritizing transparency through a centralized and searchable database, the GLO will prevent its limited resources from being spent on answering duplicative public information requests.

Staff Response: The Texas General Land Office shall, in compliance with all federal requirements, maintain a public facing website that accounts for how all grant funds are being used and administered. This website shall include links to all action plans, action plan amendments, CDBG-DR program policies and procedures, performance reports, citizen participation requirements, and any other information deemed relevant and necessary under the law.

Comment Received: Action Plan Amendment 1 does not adequately tie its needs assessment to its program allocation decisions.

Staff Response: The Action Plan Amendment 1 utilizes the most current data available to make all allocation decisions. The GLO remains committed to ensuring the needs of communities are adequately assessed and addressed to promote a comprehensive recovery for all impacted Texans.

Comment Received: The Needs Assessment undervalues unmet needs among renters and LMI households. The GLO has an obligation to use the CDBG-DR funds in a manner that will best serve the impacted population by developing a methodology that properly accounts for the needs of LMI households.

Staff Response: The Texas General Land Office has utilized the most current available data to formulate unmet needs values across all impacted regions. This unmet needs analysis, combined with a commitment to adhering to the requirement that 70% of the aggregate amount of funds be utilized to benefit the LMI population, work to ensure that CDBG-DR funds are allocated in a manner that will best serve all impacted households. Additionally, the GLO utilized the Social Vulnerability Index (SVI) in calculating unmet need in an effort to account for some of the issues addressed in this comment.

Comment Received: The GLO must address the inadequate allocation of funds to renter, who are more likely to be African-American and Hispanic, to avoid any potential for a disparate impact on these protected groups.

Staff Response: The Texas General Land Office is committed to administering CDBG-DR funds in a manner that complies with all applicable federal law, including Title VI of the Civil Rights Act of 1964. Those efforts include an analysis that is cognizant of how pure empirical data must be supplemented with data like that contained in the Social Vulnerability Index to reach a more wholistic view of needs.

Comment Received: We have concerns about the Affordable Rental Program, including its limited funding, program participation, and the past difficulties the GLO has faces in finding suitable sites.

Staff Response: The Affordable Rental Program allows for the rehabilitation, reconstruction, and new construction of units. The current program guidelines were designed in an effort to ensure that the multifamily housing needs of those in the impact area are addressed as quickly and efficiently as possible. The GLO shall give adequate consideration to the idea of permitting single-family home rental properties under future Affordable Rental Programs.

Comment Received: The GLO should reallocate the $72.7 million for the Partial Repair and Essential Power for Sheltering ('PREPS') match to the Affordable Rental Program by relying on the rainy day fund or existing funds to cover this expense. Additionally, the GLO should encourage local jurisdictions to focus on housing instead of covering cost shares for mitigation and public assistance that can be done with future allocations.

Staff Response: The State of Texas, in an effort to ensure that impacted Texans were able to quickly get back into their homes following Hurricane Harvey, made the decision to allocate $72.7 million for the Partial Repair and Essential Power for Sheltering to cover the required funding match in order for the program to move forward. The PREPS program has allowed for thousands of impacted Texans to shelter in their homes while necessary repairs are being made and promotes a faster and less financially burdensome recovery process for eligible applicants.

The GLO and all jurisdictions utilizing CDBG-DR funds are required, as presented in the federal register, to primarily consider housing throughout the recovery process.

Comment Received: We commend the GLO for not seeking a waiver to lower the requirement that 70% of CDBG-DR funds be used to benefit LMI populations. We also applaud the GLO's recognition that needs assessments "should set goals within the income brackets similar to the damage units within the impacted areas".

Staff Response: The GLO recognizes the support provided in this comment.

Comment Received: It is not only a waste of time to develop program guidelines by regional areas, but an administrative burden on regional entities, the GLO, and advocates.

Staff Response: The Texas General Land Office is committed to ensuring that all disaster recovery programs and projects are tailored to the specific needs of each community. This dedication to local control includes the allowance of program guidelines that are specific to the needs and environment of each locality. It should be noted that although there is a certain degree of local control, the GLO maintains oversight of all CDBG-DR programs and ensures compliance under federal law.

Comment Received: The GLO has failed to set out a plan to ensure timely completion of projects or to minimize opportunities for fraud, waste, mismanagement, and abuse.

Staff Response: All disaster recovery funding and projects are subject to the following timeline as outlined in the Federal Register notice. The GLO and HUD maintain responsibility for the auditing and compliance monitoring of all programs. These routine and robust audits work to minimize the opportunity for fraud, waste, mismanagement, and abuse of CDBG-DR funds.

Comment Received: The GLO should require standard benefit levels across jurisdictions to ensure housing assistance programs are offered across all parts of the disaster affected regions.

Staff Response: The Texas General Land Office shall give adequate consideration to the feedback provided in this comment.

Comment Received: We support funding the Local, Regional, and State Planning Program; however, the GLO needs to be more inclusive of nonprofits during the planning process.

Staff Response: The Texas General Land Office remains open to partnering with nonprofit entities to ensure disaster recovery planning is effective and efficient. The feedback provided in this comment will be given adequate consideration.

Comment Received: The Local Buyout and Acquisition Program described in Action Plan Amendment 1 is too vague to ensure equitable buyout administration.

Staff Response: The formation and administration of buyout programs associated with Amendment 1 to the State Action Plan shall be outlined in the program specific policies and procedures as they are developed by the entity administering the funding. The Texas General Land Office, however, shall maintain ultimate oversight of these programs and will ensure that all programs are administered in accordance with federal law.

Comment Received: Action Plan Amendment 1's references to infrastructure spending are too vague to ensure that the funds will be spent on projects that will mitigate future disaster impacts for LMI communities.

Staff Response: The Texas General Land Office remains committed to ensuring all disaster recovery programs work to rebuild in resiliency and mitigate the potential impact of future disasters. All infrastructure projects are subject to the rules and regulations outlined in both the Federal Register associated with the funding and all applicable federal law. Additionally, infrastructure activities are a factor in calculating whether 70% of the aggregate amount of grant funds have been utilized to benefit the LMI population in a given impact area. Combined, these facts afford protections to ensure that funds will be spend on projects that will mitigate future disaster impacts for LMI communities.

Comment Received: The GLO should increase funding to affordable housing initiatives and expand programs like mobility counseling, the provision of relocation expenses, and the provision of incentive payments to fulfill its obligation to affirmatively further fair housing.

Staff Response: The Texas General Land Office remains committed to ensuring all programs administered with CDBG-DR funds are done in accordance with current federal law, including the obligation to affirmatively further fair housing. The GLO will give adequate consideration to the feedback provided in this comment as it strives to foster a recovery for Texans in a manner that furthers the objects presented under its obligation to Affirmatively Further Fair Housing.

Comment Received: The Homeowner Assistance Program will not adequately allow homeowners to relocate unless it incorporates additional protections.

Response from Harris County: The County's Homeowner Assistance Program (HAP) provides assistance to homeowners who are in need of temporary relocation while their home is being repaired or reconstructed. Within the relocation assistance and for those homeowners who required additional storage of personal property, storage assistance is available. Additional information on HAP assistance will be provided in the HAP guidelines, which are available for review at https://csd.harriscountytx.gov/Pages/DisasterRecovery.aspx.

Response from the City of Houston: Relocation assistance in the City of Houston's Homeowner Assistance Program will be provided to displaced homeowners in compliance with federal, state and local regulations. The City of Houston will include information on relocation assistance in the program guidelines for the Homeowner Assistance Program.

Comment Received: The Homeowner Reimbursement Program is unlikely to meet the 70% LMI threshold, considering LMI households are unlikely to have the means to pay for out of pocket repairs.

Staff Response: The Texas General Land Office shall administer CDBG-DR programs in a manner that adheres to the HUD requirement that 70% of the aggregate amount of funding are utilized to benefit the LMI population within the impact area.

Comment Received: The GLO must allocate more money to the rehabilitation and construction of multifamily units with CDBG-DR funds and use CDBG-DR funds to address the shortcomings in FEMA's programs.

Staff Response: The Texas General Land Office shall continue to utilize the most current data available to assess need and design programs to address those needs. To date, the GLO has designed the Affordable Rental Program to address the need to rehabilitate, reconstruct, or construct multi-family housing throughout the impact area. The GLO shall take the feedback provided and give it adequate consideration.

Comment Received: Action Plan Amendment 1 fails to identify the extent of displacement or address the significant obstacles displaced residents face in returning to their communities.

Staff Response: The Texas General Land Office remains committed to working towards a recovery process that utilizes the most current data to recognize and address the needs of disaster victims. The feedback provided in this comment shall be given adequate consideration as GLO programs work to address obstacles displaced disaster victims face when attempting to return to their homes.

Comment Received: Action Plan 1 does not address vulnerable populations or shelters.

Staff Response: The Texas General Land Office is committed to addressing the needs of all disaster victims, including vulnerable populations including the homeless and the elderly. The feedback and insight provided in this comment will be given adequate consideration as programs progress.

Comment Received: The GLO should commit to using any means necessary to prevent homelessness and seek guidance from nonprofit experts in gauging the need for supportive services.

Staff Response: The Texas General Land Office is committed to engaging with subject matter experts to develop innovative and effective programs that foster a wholistic disaster recovery. The GLO is open to engaging with nonprofit experts to assess and address issues related to homelessness prevention and will give the feedback provided in this comment adequate consideration.

Comment Received: The Economic Revitalization Program should be limited to no more than $25 million and available only to microenterprises.

Staff Response: The Texas General Land Office shall utilize the Economic Revitalization Program to provide interim assistance to small businesses impacted by Hurricane Harvey by offering deferred forgivable loans in exchange for job creation or retention for low-to moderate-income employees. As currently constructed, the Economic Revitalization Program is available to small businesses in CDBG-DR eligible counties to foster an expansive recovery for the impact area. The suggestions provided in this comment shall, however, be given adequate consideration.

Comment Received: Action Plan Amendment 1 does not appropriately account for other sources of funds.

Staff Response: Other sources of funds, beyond those provided through CDBG-DR programs, will vary by program and impact area. In the instance of Amendment 1, Harris County and the City of Houston would need to address how their specific programs and impact area present distinct opportunities for other sources of funding.

Response from Harris County: The County is continuously working to writing grants for additional non-HUD funding, such as FEMA Hazard Mitigation funding for such activities as residential buyout and drainage improvements. The County is also participating in the FEMA Public Assistance program to repair affected systems and a countywide bond program for drainage improvements. To date, the majority of these funds have not been awarded to the County. When awarded, Harris County, as required by HUD, will account for any leveraging/matching funding to a CDBG-DR funded project in a duplication of benefit review. For those homeowners, who received FEMA/SBA or other

charitable funds to repair their home, a duplication of benefit review will also be conducted during the program's applicant eligibility review.

Response from the City of Houston: The City of Houston will leverage public and private sources of funding as necessary to carry out activities related to disaster recovery. These sources may include the Tax Increment Reinvestment Zones (TIRZ) affordable housing set-aside funds, Affordable Housing Bond funds, the Tax Abatement Ordinance, federal and state tax incentives, federal entitlement grant funds, state funded bond programs, and private sources.

The State of Texas Plan for Disaster Recovery was released on April 10, 2018. The Action Plan was posted on the GLO website. The public comment period for the document ran to April 10, 2018 to May 1, 2018. The GLO distributed a Statewide press release announcing the availability of the Plan on the GLO website. Additionally, the GLO sent out an email to over 1,100 recipients across the 49 eligible counties targeting local emergency management coordinators, county and local government officials, public housing authorities and other interested parties.
List of Those that Submitted Comment:

Name		Individual, County, City or Organization
Last	**First**	
Migues	Phill	Private Individual
Reyna	Robert	Beaumont Housing Authority
Branick	The Honorable Judge Jeff	Jefferson County
Boone	Christopher	City of Beaumont
Jobe	Ken	Private Individual
Herbert	The Honorable Judge Robert	Fort Bend County
Steele	Jack	Houston-Galveston Area Council
Sylvia	The Honorable Judge Jimmy	Chambers County
Choudhury	Shamim	Private Individual
Choudhury	Tajin	Private Individual
Clark	Commissioner Ken	Galveston County
Omidi	Rouga	Private Individual
Scoggin	Gary	Private Individual
Johnson	Eric	Private Individual
Tuttle	Wren	Private Individual
Blaschke	Stephanie	Private Individual
Wiginton	Cindy	Private Individual
general public_1	unknown	Private Individual
Grimes	Summer	Private Individual
Moore	Michelle	Private Individual
Ashworth	Krisen	Private Individual
Heiligbrodt	Blair	Private Individual
Murphy	State Representative Jim	Texas House of Representatives
Conly	Shandy and James	Private Individual
Balasubramanian	Bala	Private Individual
Paul	State Representative Dennis	Texas House of Representatives
Ardoin	Joel	Orange County Environmental Health and Code Compliance
Holloway	Susan	Pearland Independent School District
Jaramillo	Geronimo	Private Individual
Babb	Margaret	Private Individual

Name		Individual, County, City or Organization
Last	**First**	
Steele	Jack	Houston-Galveston Area Council
LePore	Deborah	Private Individual
Stalarow	Staci	Houston-Galveston Area Council
Grimuado	Carla	Private Individual
Stocks	Mikayla	Private Individual
Ermis	Terry	Private Individual
Pendleton	DJ	Texas Manufactured Housing Association
Rodriguez	Angie	Private Individual
Sebesta	Honorable Judge Matt	Brazoria County
Strong	Catherine	West Houston Citizens
Record	Sara	Disability Rights Texas
Cerrone	Sarah	Chambers County
Meyers	Commissioner W.A. "Andy"	Fort Bend County
Lunde	Emily	Private Individual
Briseno	Charmaine	Private Individual
Gregorcyk	Tracey	Private Individual
Tomas	Alun	City Secretary, City of Dickinson
Asghari	Fatemeh	Private Individual
Murphy	The Honorable Judge Sydney	Polk County
Mills	Ronald	Port Mansfield
Dailey	Balis	Mayor, City of Grapeland
Ledbetter Parham	Amy	Habitat for Humanity
Cockram	Mark	Private Individual
Haines	Donna	Private Individual
Pennington	Bobby	Assistant City Manager, City of Cleveland
Owen	Robert	Private Individual
McGuill	Joyce	Private Individual
Turkel	David	Harris County
Miller	Cheryl	Private Individual
Miller	Kimberly	Private Individual
Duhon	The Honorable Judge Carbett	Waller County
Nelson	Commissioner Gary	Chambers County
Melton	Daryl	Sabine County
Stewart	Bill	City of Huntington
Steele	Jack	Houston-Galveston Area Council
Jones	Deborah	Private Individual
Reed	Cyrus	Sierra Club Lone Star Chapter
Samuels	Eric	Texas Homeless Network

Name		Individual, County, City or Organization
Last	**First**	
Murphy	State Representative Jim	Texas House of Representatives
Mills, Jr	The Honorable Judge C.H.	Aransas County
No Name		Private Individual
Henry	The Honorable Mark	Galveston County
Charles	Miller	Private Individual
Lee	Krystal	Private Individual
Fiederlein	Robert	Avenue
Shields	Vincent	Private Individual
Adra	Hallford	City of Texarkana
Rasch	Steven	Private Individual
Denson	John	Private Individual
Schick	Maria	Private Individual
Schick	Doug	Private Individual
Ferguson	Blair	Private Individual
Clements	Janet	Private Individual
Cobb	Jennifer	Private Individual
Cowan	Nicole	Private Individual
Whiles	Richard	Private Individual
Lackenby	Karen	Private Individual
Ward	Johnathan	Private Individual
Andel	Joan	Private Individual
Ferguson	Blair	Private Individual
Comstock	Courtney	Polk County, Texas Office of Emergency Management
Blair-Cockrum	Jennifer	Private Individual
Hunt	Lonnie	DETCOG
Ashworth	Krisen	Private Individual
Mcknight	Jennifer	Private Individual
Robert	Smith	Mayor, City of Hudson
Lovell	The Honorable Jim	Houston County
Rainey	Kate	Texas Rio Grande Legal Aid, INC
Jennifer	Blair-Cockrum	Private Individual
Kelley	Denise	City Manager, City of Jasper
Craig	Sally	Private Individual
Defilippo	John	Private Individual
Stone	Lorita	Private Individual
Tenczar	Bob	Private Individual
Stehle	DeLaine	Private Individual
Salinas	Marianne	Private Individual
Nogaret	Leslie	Private Individual
Inaba	Jonathan	Private Individual
Rasch	Dawn	Private Individual

Name		Individual, County, City or Organization
Last	**First**	
Salinas	Joe	Private Individual
DallePezze	Stacey	Private Individual
Clark	Ken	Commissioner, Galveston County
McCasland	Tom	Houston Housing and Community Development Department
George	Frank	Mayor, City of Kirbyville
Saavedra	Griselda	Private Individual
Lee	Congresswoman Sheila Jackson	Congress of the United States House of Representatives
Jobe	Ken	Tyler County Emergency Management
Podvorec	Candice	Private Individual
Masters	Julie	Mayor, City of Dickinson
Holland	Kevin	Mayor, City of Friendswood
Hallisey	Pat	Mayor, City of League City
Elliott	Libby	Texas Department of Insurance
Menefee	Janet	Private Individual
Lane	Kathy	Private Individual
Heiligbrodt	Hagan	Private Individual
Chavez	Lisa	Private Individual
Shook	Lora	Private Individual
Stover	Linda	Costal Bend Center for Independent Living
Nesting	Jill	Private Individual
Chavez	Javier	Private Individual
Pearce	Helen	Private Individual
Kubena	Linda	Private Individual
Woodrome	C.D.	City Secretary, City of Ivanhoe
Price	Honorable Judge Paul	Newton County
McLawhon	Kyle	Private Individual
Higgins	Michele	Private Individual
Chris	J	Private Individual
Williams	Sara	San Patricio Emergency Management Coordinator
Spenrath	The Honorable Phillip S.	Wharton County
Aycoth	Andrew	Private Individual
Taft	Ray	Private Individual
Gonzales	Cheryl	Private Individual
Palmer	Kathy	Private Individual
Wolff	Liz	Houston Organizing Movement for Equity
Collins	Amy	Rio Texas Conference United Methodist Church
Friedberg	Andrew	City of Bellaire
Cruse	Rebecca	Private Individual

Name		Individual, County, City or Organization
Last	**First**	
Oviedo	Marcie	Lower Rio Grande Valley Development Council
Kube	Kaycee	Private Individual
Rainey	Kate	Texas Rio Grande Legal Aid
Duncan	Charlie	Texas Housers
Green	Graham	Smart Home America
Beardsley	Elizabeth	U.S. Green Building Council
Hess	Darren	Private Individual
Laywell	Kayla	Coalition of the Homeless
Sloan	Maddie	Texas Appleseed

The following is a summary of the comments received as well as the response.

Comment Received: The Fort Bend Community is in peril of another flood without assistance to correct the current retention problem. Please include Katy and Fort Bend (Canyon Gate area) in the funding distribution.

Staff Response: The Texas General Land Office remains committed to ensuring the efficient and effective distribution of the disaster recovery funds allocated to our state in response to Hurricane Harvey. Although the current draft of the Action Plan does carve out specific allocations for Harris County and the City of Houston, Fort Bend County and several zip codes in the area have also been designated as potential beneficiaries of these funds. All project selections will be determined by the local communities so you should ensure both your County and City are aware of any specific project needs. As this process progresses, the GLO shall maintain a close working relationship with community leaders in all impacted communities to ensure that specific needs are adequately addressed.

Comment Received: Some housing authorities have public housing units that were severely impacted and need reconstruction; however, requiring Affirmatively Furthering Fair Housing reviews could determine many of those sites ineligible for use. The most cost efficient use of these funds would be to permit those housing authorities to rebuild some of those units directly on the same land where the current damaged units exist.

Staff Response: The Texas General Land Office, as the primary steward of Community Development Block Grant funds for Disaster Recovery purposes, is committed to ensuring that all funding is allocated in a manner that is effective, efficient, and in compliance with all applicable laws. At the date that this response as drafted, the underlying policies and procedures of the Affirmatively Furthering Fair Housing doctrine control and the GLO shall conduct evaluations and reviews as directed under federal law unless otherwise instructed by the U.S. Department of Housing and Urban Development.

The GLO will, however, continue to coordinate with the U.S. Department of Housing and Urban Development in exploring all available options in order to execute the most efficient and effective disaster recovery possible.

Comment Received: It is extremely strange that the other 15 most impacted counties (notwithstanding the City of Houston and Harris County) are being put under a state-wide disaster funding administration plan without the GLO being able to leverage the talent and experience of the COGs.

Staff Response: The Texas General Land Office remains committed to ensuring that disaster recovery funding is administered in a manner that best serves the needs of local communities. At the direction of the U.S. Department of Housing and Urban Development, the City of Houston and Harris County have been given a direct allocation of funding to execute their disaster recovery measures. It has also been under the direction of the U.S. Department of Housing and Urban Development that the GLO has been directed to oversee the remaining programs for the rest of the impacted counties. Although the GLO shall be administering a state-wide disaster recovery program, it should be noted that Local needs and input will be considered in programs that allocate funding to specific geographic areas.

Comment Received: The downtown area of the City of Beaumont has, a result of damage caused by Hurricane Harvey, has suffered economic damages after the closing of Chicago Bridge and Iron. Commenter is asking that Beaumont be considered as a recipient of local planning funds to develop a Downtown Revitalization Plan. Commenter also requests planning funds to undertake a Downtown Housing Planning Study utilizing the non-profit group ArtSpace to develop downtown housing and attract new residents to the area. Finally, Beaumont recognizes that Hurricane Harvey had a significant impact on the homeless population in the area and is requesting planning funds to develop a comprehensive homeless strategy.

Staff Response: The Texas General Land Office, in an effort to ensure the recovery process has successful long-term impact on each community served, has designated a set amount of CDBG-DR funds for planning purposes. The GLO will leverage Texas universities and/or vendors to conduct such studies and each community will be given the opportunity to submit potential study ideas for consideration. The GLO recognizes how long-term planning can impact the overall economic well-being of impacted communities and remains dedicated to ensuring that each community has a substantial opportunity to be considered for planning funds. These study requests have been noted.

Comment Received: Would it be allowable for local jurisdictions to have more freedom to use funds for infrastructure instead of housing? Example: could a locality use 60% of funds for housing needs and 40% for infrastructure based on local need?

Staff Response: The Texas General Land Office is committed to ensuring that all disaster recovery funding is allocated in a manner that is consistent with the rules and regulations provided for in the Federal Register. In this instance, the Federal Register has mandated that each grantee primarily consider and address its unmet housing recovery needs. All funding distribution must remain in compliance with Federal Register guidelines unless otherwise permitted by the U.S. Department of Housing and Urban Development.

Comment Received: Fort Bend County is requesting that the Texas General Land Office request a waiver from the U.S. Department of Housing and Urban Development to expand the proposed State-administered housing recovery program to include opportunities for regional and locally-administered housing recovery programs.

Staff Response: The Texas General Land Office, as the primary administrator of CDBG-DR funds for the State of Texas, is committed to ensuring each impacted community retains the most local control feasible in determining the most effective use of disaster recovery funds while complying with the U.S. Department of Housing and Urban Development preferences for program implementation. The GLO shall continue to work with each impacted community, regardless of which entity is considered the primary administrator of the program, to ensure an efficient and effective recovery.

Comment Received: Houston-Galveston Area Council (H-GAC) is requesting that the Texas General Land Office request a waiver from the U.S. Department of Housing and Urban Development to expand the proposed State-administered housing recovery program to include opportunities for regional and locally-administered housing recovery programs.

Staff Response: The Texas General Land Office seeks to administer CDBG-DR funds in the most effective and efficient manner possible while complying with the U.S. Department of Housing and Urban Development preferences for program implementation. The GLO shall, however, administer these programs in close coordination with localities to ensure each program is tailored to the needs of that impacted region.

Comment Received: H-GAC is requesting that the GLO seek a waiver to the requirement that 70% of the aggregate amount of funds be utilized in a manner that benefits the LMI population in the impacted area.

Staff Response: The U.S. Department of Housing and Urban Development has established the requirement that 70% of the aggregate of CDBG-DR funds be utilized for the benefit of the low- and moderate-income population in the impacted area. the U.S. Department of Housing and Urban Development has indicated they will only consider a waiver to this requirement if it can be adequately demonstrated that the needs of the low- or moderate-income population within the impacted area have had their needs sufficiently addressed or potentially if the impact is less than 70% low- or moderate-income persons. If, during the recovery process, the GLO determines that this burden has been met in a manner that warrants a waiver request from HUD, it will pursue that option.

Comment Received: H-GAC requests the GLO seek a waiver to lower the LMI area benefit requirement as it pertains to potential infrastructure projects.

Staff Response: The U.S. Department of Housing and Urban Development has established the requirement that 70% of the aggregate of CDBG-DR funds be utilized for the benefit of the low- and moderate-income population in the impacted area. The U.S. Department of Housing and Urban Development has indicated they will only consider a waiver to this requirement if it can be adequately demonstrated that the needs of the low- or moderate-income population within the impacted area have had their needs sufficiently addressed or potentially if the impact is less than 70% low- or moderate-income. If, during the recovery process, the GLO determines that this burden has been met in a manner that warrants a waiver request from the U.S. Department of Housing and Urban Development, it will pursue that option.

Comment Received: What is the justification for allocating Harris County and Houston 45% of the total funds?

Staff Response: The Texas General Land Office is committed to ensuring all Community Development Block Grant funds allocated in response to Hurricane Harvey are implemented in a compliance with all rules and regulations outlined by federal law. To date, it has been determined by the U.S. Department of Housing and Urban Development that the $5 Billion allocation of CDBG-DR funds shall be allocated in the manner presented in the Action Plan. The GLO is obliged to follow these guidelines. Allocation amounts to Harris County and the City of Houston were determined by the U.S. Department of Housing and Urban Development.

Comment Received: Does the GLO considered these funds to be locally controlled? If so, explain local control when only 8.2% of the total allocation is for 'locally controlled' infrastructure programs and all remaining funds are going to 'state administered' housing and planning activities.

Staff Response: The Texas General Land Office is committed to ensuring that all disaster recovery projects, whether it be housing, infrastructure, or economic development, are developed and implemented in constant communication with local officials to ensure the needs of each community are being addressed. It should be noted that the words 'state administered' do not in any way reduce the level of local participation in selecting and executing recovery projects. Program implementation is being performed as per the U.S. Department of Housing and Urban Development direction.

Comment Received: How will communities and/or projects that do not have a high LMI percentage, but do need address local and regional storm related impacts, access these funds?

Staff Response: CDBG-DR funds must be administered in a manner that is consistent with federal law, which includes the usage of 70% of the funds for the benefit of low- and moderate income populations which allows the remaining 30% of the funds to be spent on projects that do not meet the low to moderate income national objective.

Comment Received: What will be the process to determine which planning studies are pursued? Will there be priority given to regional projects? Will studies for Cities and Counties be eligible?

Staff Response: The Texas General Land Office is working in coordination with research institutions within the state to present ample resources to conduct planning activities funded by the Hurricane Harvey recovery funds. Each community will have to opportunity to present their specific planning needs and studies for cities and counties will be eligible. Outside of the restrictions placed on funds by federal law, the GLO does not have a prioritization method currently in place for these studies. Additional details will be made available in the planning guidelines.

Comment Received: Does the GLO have an itemized budget for the Administration of funds in the amount of $251,210,750 as well as Project Delivery in the amount of $27,537,089 for infrastructure and $27,537,089 for housing?

Staff Response: The Texas General Land Office shall, as it has with prior grants, will remain within the prescribed caps for Administrative and Project Delivery. And as has previously occurred any funds not utilized for those purposes will be converted to additional project dollars.

Comment Received: Will local control be maintained for procurement of Administration, Acquisition Services, Engineering, and Environmental Service Providers? What is the cap on fees?

Staff Response: The Texas General Land Office will only procure vendors for their own use. Subrecipients will be responsible for the procurements of all support services necessary to implement the CDBG-DR funded projects. Caps associated with project delivery, administration, and engineering are detailed in the Action Plan and vary by program type.

Comment Received: Why is so much of the funding being allocated towards housing projects?

Staff Response: The Federal Register notice associated with this CDBG-DR allocation established the rules and regulations by which these funds are to be allocated. In particular, the federal register notice requires a substantial amount of funds from this allocation be used towards housing projects. The GLO is committed to ensuring all CDBG-DR funds are implemented in a manner that is consistent with these rules.

Comment Received: What is the remaining balance in the Hurricane Ike Housing Program? Does the GLO expect to expend 36% of the total allocation on housing projects alone?

Staff Response: The Hurricane Ike Housing Program and any remaining funds currently have no bearing on the allocation for which this Action Plan was published. Any further information regarding those grants should be through inquiries submitted outside of this public comment forum.

Comment Received: How does the GLO expect the Homeowner Assistance Program, the Local Buyout and Acquisition Program, and the Affordable Rental Program to be complete in three years?

Staff Response: The Texas General Land Office recognizes that the CDBG-DR allocation associated with this Action Plan has specific timelines associated with both the obligation of and expenditure of funds. These timelines have been set by the Federal Register notice and the GLO is committed to working with communities to meet these deadlines. If needed, the GLO will request additional time as is outlined in the Federal Register.

Comment Received: Please remember that when it comes to counties and cities, one size doesn't fit all.

Staff Response: The Texas General Land Office recognizes that every community is experiencing different recovery needs and is committed to working with each community to ensure those specific needs are addressed to foster the most effective and efficient recovery possible. Where possible, local prioritization will apply.

Comment Received: Residents, like myself, living in Canyon Gate are currently unable to fund repairs to common areas that have suffered significant damage as this area is insured for wind and peril, but not for floods. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office remains committed to ensuring that the needs of communities are adequately addressed through disaster recovery programs funded by the allocation discussed in this Action Plan. It should be noted, however, that the City of Houston and Harris County

shall be largely responsible for a portion of recovery programs within their respective jurisdictions. Comments and concerns like this one, should also be voiced to these authorities as well as programs are formed and executed.

Comment Received: Galveston County is requesting The Texas General Land Office pursue maximum flexibility in the use of CDBG-DR funds allocated under this Action Plan by requesting a waiver that would expand state-run housing programs to include locally and regionally controlled housing programs. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office seeks to administer CDBG-DR funds in the most effective and efficient manner possible while complying with the U.S. Department of Housing and Urban Development preferences for program implementation. The GLO shall, however, administer these programs in close coordination with localities to ensure each program is tailored to the needs of that impacted region.
The GLO is committed to working alongside communities, like Galveston County, produce the most effective and efficient recovery possible.

Comment Received: Why is HUD discriminating between Hurricane Harvey victims by providing direct financial assistance when homeowners who were flooded still need financial help?

Staff Response: The Texas General Land Office is committed to working with impacted communities to ensure recovery needs are adequately addressed from available funds; however, that work must be conducted in a manner that is consistent with federal laws and regulations. The GLO remains dedicated to advocating for all Texans throughout the recovery process.

Comment Received: There should be no 70% LMI requirement associated with these funds.

Staff Response: The federal requirements associated with the CDBG-DR allocation discussed in this Action Plan are outlined in the Federal Registered. An aggregate of 70% of all CDBG-DR funds must be used to benefit the low- or moderate-income population in the impacted area unless a waiver is granted by the proper authority. The GLO remains committed to ensuring that all CDBG-DR funds are used in a manner consistent with federal law. Without a waiver or change by the U.S. Department of Housing and Urban Development the 70% low- or moderate-income aggregate requirement must be maintained. Federal Register

Comment Received: The home for this community member was flooded from the reservoir and is not located in an area where natural disaster flooding typically occur, why should they have to elevate their home?

Staff Response: Flood plain requirements are locally administered and elevation requirements for homes in the flood plain seeking to utilize CDBG-DR assistance are outlined in the Federal Register associated with this allocation and cannot be waived by The Texas General Land Office. Despite this, your concerns are valid and the GLO will continue to advocate for all Texans impacted by Hurricane Harvey as the recovery process continues.

Comment Received: The 14 Day comment period set forth by the GLO is too short for effective analysis of the plan. The Galveston County Long Term Recovery Group is requesting the GLO

take input gathered during the 14 day comment period and adjust/republish the Action Plan with an additional 30 day comment period to include public meetings.

Staff Response: The Texas General Land Office, in full compliance with the rules and regulations set forth in the Federal Register associated with this Action Plan, published this Draft Action Plan for more than the 14 days required by the Federal Register to ensure an effective and efficient recovery process. The GLO considers this publication period adequate.

The Federal Register requires the Action Plan be submitted within 90 days of February 9, 2018 which will not allow for any further extensions of the Action Plan public comment period.

Comment Received: The Galveston County LTRG is requesting that all calculations utilized in determining fund distribution be made public and that appropriate time be given for the recovery community to analyze and comment.

Staff Response: The current Action Plan presents the data analysis that outlines the distribution of funds starting at the highest level and working its way down to localities. Direct allocations to the City of Houston and Harris County were determined and calculated by the U.S. Department of Housing and Urban Development and all other calculations done by the GLO are presented within the Action Plan for review.

Comment Received: The Galveston County LTRG is requesting that a criterion under the required 70% aggregate LMI benefit be set. If the GLO is not authorized to do this, then a waiver should be requested from HUD.

Staff Response: The requirement that 70% of the aggregate of CDBG-DR funds be utilized for the benefit of the low- or moderate-income population within a disaster impacted area is established in the Federal Register.

Comment Received: The Galveston County LTRG suggests that local input processes associated with planning studies be expanded to include input from local experts, organizations, and governments.

Staff Response: The Texas General Land Office remains committed to ensuring robust public participation at all stages of the disaster recovery process. This commitment includes ensuring local experts, organizations, and governments are able to productively consult with research institutions to formulate planning studies. The GLO has every intention of conducting the planning study process in a manner that is open and transparent.

Comment Received: The PREPs and DAHLR Programs are not good templates for the much larger CDBG-DR Program and the GLO should work to understand why these programs were unsuccessful or select a different contracting strategy

Staff Response: The PREPs and DAHLR Programs originated with FEMA and were administered as Temporary Housing Programs directly following Hurricane Harvey in compliance with FEMA requirements. The Texas General Land Office intends to leverage these programs by allowing for qualified applicants who participated in either PREPs or DAHLR to still receive assistance under the CDBG-DR grants to complete repairs. The GLO is fully cognizant of the important differences between implementing a temporary housing program and long-term recovery efforts and has already

taken review steps to review and refine programs like PREPs and DAHLR are more efficient responses for future disasters.

Comment Received: The City of Houston and its allocation of $1.55 Billion dollars must be given thorough oversight throughout this process to ensure funds are not misappropriated.

Staff Response: The Texas General Land Office, is responsible for maintaining oversight of all uses of federal dollars allocated in connection with Hurricane Harvey to include funds provided to the City of Houston. This responsibility includes ensuring that all funds are spent in a manner that is consistent with federal law. The City of Houston will also be subjected to audit and compliance functions performed by federal authorities at different stages of the recovery program to ensure compliance like all subrecipients funded under the CDBG-DR funds.

Comment Received: Please include Refugio County in the method of distribution for this Action Plan

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please consider adding Refugio County to the list as Austwell, Tivoli, Woodsboro, and Bayside were directly hit by Hurricane Harvey.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please include the County of Refugio in this Action Plan's method of distribution.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please include Bayside and Refugio County in areas that need help after the hurricane.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of

distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please do not overlook the town of Bayside, TX in the method of distribution for this allocation.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: As a resident of the 77079 zip code, I believe that all disaster victims who flooded should be eligible for grant assistance.

Staff Response: The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover

Comment Received: The City of Houston and the Mayor are not equipped to distribute these funds.

Staff Response: It has been determined by the U.S. Department of Housing and Urban Development that the City of Houston shall receive a direct allocation of CDBG-DR grant funds. The Texas General Land Office remains committed to ensuring, through adequate oversight procedures, that all CDBG-DR funds are administered in a manner that is in compliance with federal law.

Comment Received: The requirement for 70% of the funding to go to the LMI population does not address hard hit areas with families that have been excluded or deemed ineligible for FEMA assistance. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office is dedicated to ensuring that, subject to federal regulations, the needs of impacted communities are adequately addressed; however, the administration of CDBG-DR funds must be done in accordance with federal law. The requirement that 70% of the aggregate of funding be used to aid the Low- and moderate-income population in the impacted area has been established in the Federal Register in which this allocation was published and must be followed.

Comment Received: All of those who were impacted by Hurricane Harvey should be eligible to receive grant aid regardless of zip code, SBA loan status, or income level.

Staff Response: The Texas General Land Office is committed to ensuring all CDBG-DR funds are distributed, to the greatest extent allowable under the law, to as many disaster victims as possible. The GLO is, however, bound by the rules and regulations set by the U.S. Department of Housing and Urban Development and those rules include the restrictions on zip codes, income levels, and flood

insurance. Despite this, the GLO is dedicated to advocating for the needs of impacted Texans and will continue to work diligently to ensure an effective and efficient recovery process.

Comment Received: The City of Houston and the Mayor are not equipped to distribute these funds.

Staff Response: It has been determined by the U.S. Department of Housing and Urban Development that the City of Houston shall receive a direct allocation of CDBG-DR grant funds. The Texas General Land Office remains committed to ensuring, through adequate oversight procedures, that all CDBG-DR funds are administered in a manner that is in compliance with federal law.

Comment Received: Allow all who were flooded to receive direct CDBG-DR grants, regardless of zip code, income level, flood insurance, or not. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office is committed to ensuring all CDBG-DR funds are distributed, to the greatest extent allowable under the law, to as many disaster victims as possible. The GLO is, however, bound by the rules and regulations set by the U.S. Department of Housing and Urban Development and those rules include the restrictions on income levels and flood insurance. Despite this, the GLO is dedicated to advocating for the needs of impacted Texans and will continue to work diligently to ensure an effective and efficient recovery process.

Comment Received: The City of Houston, Mayor Turner, and Harris County are not equipped to distribute these funds and it will delay aid to those who need it. Please allow the GLO to administer these funds. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has deemed the City of Houston as eligible to receive a direct allocation of the CDBG-DR funds associated with this Action Plan. The City of Houston shall be responsible for administering this direct allocation; however, the Texas General Land Office remains committed to ensure proper oversight is conducted at every stage of the recovery process.

Comment Received: Funds need to be available and distributed to assist families with the increased cost of compliance in Houston. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has, through established federal law, determined eligibility criteria for applicants seeking aid under CDBG-DR grants. The Texas General Land Office has been made aware of this new issue through this public comment period and will work to advocate on behalf of impacted Texans to find a viable solution.

Comment Received: All of the CDBG-DR funding needs to be available to all households and the requirement that 70% of total funds be used for LMI populations excludes impacted families. ***(Multiple respondents provided this feedback)***

Staff Response: The requirement that 70% of the aggregate amount of CDBG-DR funds be used for the benefit of Low- and Moderate-Income populations in the impacted area has been set by the U.S. Department of Housing and Urban Development. Absent an approved waiver, the Texas General Land Office shall work to ensure that all CDBG-DR funds are administered in a manner that is consistent with federal law.

Comment Received: Allocation of Funds for Buffalo Bayou Flood Mitigation Efforts. Much of the damaged sustained by citizens in my district was caused by an overflow of flood waters from Buffalo Bayou. Investment of resources into prevention and mitigation of future flooding will reduce future costs of recovery.

Staff Response: The Texas General Land Office is committed conducting an in-depth analysis of every proposal for disaster recovery to ensure an effective recovery and mitigation and prevention of damage from future disasters. Local communities will prioritize the use of CDBG-DR funds through project selection for all infrastructure allocations. The GLO, in its evaluation of Houston's draft Action Plan, will utilize this feedback and give it thoughtful consideration.

Comment Received: The requirement that 70% of the aggregate amount of funds be utilized solely for the benefit of the LMI impacted population fails to direct an adequate amount of funds to non-LMI households.

Staff Response: The requirement that 70% of the aggregate amount of funds be utilized to benefit the Low- and Moderate-Income households that were impacted by the storm has been set by the U.S. Department of Housing and Urban Development through the publication of the Federal Register associated with this allocation of grant funds. Despite this current designation, the GLO is committed to advocating for all impacted Texans and is willing, with justification, to seek a waiver to this requirement as the recovery process develops.

Comment Received: Clarification of the maximum assistance waiver criteria and process as it is permitted to be developed by sub-recipients of CDBG-DR dollars.

Staff Response: The Texas General Land Office will, as programs and policies are developed, coordinate with communities to ensure they are adequately aware of all policies associated with programs. This will include the amount of maximum assistance allowable under each program.

Comment Received: The Action Plan should specifically address the 77079 zip code within Harris County as this area was flooded due to releases from the reservoirs following Hurricane Harvey.

Staff Response: Harris County and the City of Houston will make all funding and program decisions within their jurisdictions. Harris County and the City of Houston will be submitting their proposed programs and use of funds to the GLO in the coming months. The programs after approval by the GLO will be incorporated in an Action Plan Amendment and will be subject to a public comment period similar to that of the Draft Action Plan.

Comment Received: An SBA loan should not be considered in a duplication of benefits analysis as it is a loan that has to be paid back and homeowners are seeking to repair their homes immediately.

Staff Response: The Texas General Land Office must, in its administration of CDBG-DR funds, ensure that all funding is distributed to eligible applicants in accordance with federal law. All duplication of benefit analysis performed on incoming applications for assistance are mandated by federal law and the GLO is required to follow those processes. Unless directed differently by the U.S. Department of Housing and Urban Development, the GLO shall maintain the current procedures required under the law.

Comment Received: Please do not distribute these funds through The City of Houston and make the funds available to all of those impacted by Hurricane Harvey

Staff Response: The U.S. Department of Housing and Urban Development has deemed the City of Houston eligible to receive a direct allocation of CDBG-DR funds to aid its citizens in the recovery process following Hurricane Harvey. Although the City of Houston shall be the primary administrator of these funds, the Texas General Land Office will maintain an active role in oversight to ensure that programs are being conducted in an effective and efficient manner. The administration of CDBG-DR funds is governed by federal rules and regulations outlined by the U.S. Department of Housing and Urban Development. The GLO remains committed, absent a separate directive from the U.S. Department of Housing and Urban Development, to ensuring that every aspect of federal law is followed in administering these funds.

Comment Received: On behalf of the citizens of House District 129 and our coastal-bay communities, I respectfully request the State of Texas request an exemption to the 70% LMI requirement.

Staff Response: The Texas General Land Office, as a designated administrative body for CDBG-DR funds, is obliged to implement all disaster recovery programs in compliance with current federal laws and guidelines.

Comment Received: If the 20% of total funds allocated to the most impacted areas are not completed utilized for Homelessness Prevention, Affordable Rental, and Local Infrastructure are not fully expended, how will those funds be reallocated?

Staff Response: The Texas General Land Office shall, to the best of its ability, ensure that all funds are expended in the manner in which they have been designated under federal guidelines. If and only if, at the end of all programs, there is a surplus of funding then the GLO will re-evaluate the needs of that community and make a decision as to how those funds may be utilized.

Comment Received: Please clarify the balance of 2% that is available to local communities for Project Delivery?

Staff Response: Project delivery funds in the Draft Action Plan budget are for the GLO to utilize when Subrecipients need support to implement their programs.

Comment Received: Please elaborate on how programs directly implemented by the GLO will be structured and the role of local communities within that structure?

Staff Response: All programs directly administered by the Texas General Land Office will be structured in a manner that emphasizes local participation at every step. Programs will likely include a Grant Administrator who works directly with local officials and GLO personnel to ensure that programs both meet local needs and are administered in a manner that is consistent with federal law.

Comment Received: Woodsboro and Bayside should be considered for funding as they need help to rebuild after Hurricane Harvey.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all

communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: How will local communities pay for administering, delivering, and working with state vendors on these endeavors?

Staff Response: The Texas General Land Office shall, in accordance with the law, remit payment for any allowable costs associated with the administration of these programs. The delineation of costs and responsibilities for each program will be refined as these programs develop.

Comment Received: Where, if any, is there local control?

Staff Response: The Texas General Land Office remains committed to ensuring each impacted community is given the maximum allowable control over the disaster recovery process within its jurisdiction. The GLO will foster this local control through robust cooperative efforts with community leaders at every stage of the process.

Comment Received: How will the application process for housing programs administered by the GLO be structured?

Staff Response: The structure of the application process for housing programs administered by the GLO is currently under development and will be published to the communities as soon as possible. The GLO will dedicate ample resources during the application period to ensure public outreach to all potential eligible applicants is effectively conducted.

Comment Received: Are drainage districts and other non-governmental entities with eminent domain authority eligible applicants for acquisition?

Staff Response: Cities, counties, and other entities with eminent domain authority are eligible to receive allocations from the regional methods of distribution for the buyout and acquisition program.

Comment Received: Does the infrastructure program include drainage districts and other non-governmental entities with eminent domain authority as eligible applicants for the buyout program?

Staff Response: Only cities and counties will be eligible to receive allocations from the regional methods of distribution for the infrastructure program.

Comment Received: Is the GLO going to provide or reimburse planning funds to local governments to assist in planning processes? Will the GLO allow for the reimbursement for funds already expended on these activities?

Staff Response: To date, the Texas General Land Office will be leveraging the expertise of research institutions within the state to aid impacted communities in conducted meaningful planning studies to aid in their long-term recovery. Any funds expended by a local community must be considered

allowable under the current planning study program design to be eligible for reimbursement. The details of this structure will be released for public consumption as soon as possible.

Comment Received: Will there be a pre-award of planning funds?

Staff Response: To date, the Texas General Land Office has not permitted a pre-award for the purpose of planning studies.

Comment Received: When will the GLO make needs assessment data available to local communities?

Staff Response: All needs assessment data utilized in the analysis conducted in the current Action Plan is located within the Action Plan document in Section II of the Needs Assessment. Data not contained within the Action Plan may be requested from FEMA by the locality.

Comment Received: How will housing elevations apply if local codes require more than the two-foot limit imposed by the Action Plan? Will allowable cost adjustments be made?

Staff Response: If the situation arises where local code is more stringent than the elevation requirements established by the Action Plan, then the local code controls. Any increases in expense related to more stringent local zoning and code would be eligible expenses to the CDBG-DR program.

Comment Received: Is the GLO going to make administrative and planning funds available to Orange County to support the state administered housing and planning activities?

Staff Response: It is not envisioned that the County will need to participate in the actual implementation of the housing or planning programs. If at a later date that changes, the GLO will consider such an arrangement.

Comment Received: Who will conduct the public outreach for State administered programs? If localities conduct this, will funds be made available to cover those costs?

Staff Response: As currently designed, the Texas General Land Office will remain responsible for public outreach as an integral part of its duties to administer CDBG-DR programs. The GLO will only permit the reimbursement of allowable costs defined within each individual program.

Comment Received: Economic development projects should be done at the local level.

Staff Response: The Texas General Land Office is steadfast in its commitment to ensuring that all recovery programs are specifically tailored to meet the needs of each impacted community. This level of commitment includes the exercise of open and engaging cooperation between the GLO, local governments, community leaders, and disaster victims.

Comment Received: Local communities and vendors are better positions to efficiently conduct studies that will yield effective results.

Staff Response: The Texas General Land Office recognizes the value in utilizing local communities and their vendors to achieve effective program results and this feedback shall be given adequate consideration as programs are designed.

Comment Received: The use of local vendors, contractors, and suppliers would enhance recovery efforts within regions by increasing spending within the region.

Staff Response: The Texas General Land Office shall make every effort to conduct programs that present a comprehensive disaster recovery strategy, including utilizing methods that not only rebuild, but foster local economies by spending money locally when feasible.

Comment Received: Will the GLO allow access to planning funds to local communities for the planning efforts the program will require them to undertake?

Staff Response: Communities will be granted access to funding for costs deemed allowable for each specific program.

Comment Received: Which flood maps will be utilized to determine the Base Flood Elevation?

Staff Response: The Texas General Land Office will utilize the most up –to-date available flood maps to determined base flood elevation for projects within program areas.

Comment Received: The current allocation does not offer funding for addressing long-term solutions to reduce disaster-related homelessness. The Coordinator of Student Outreach and Intervention Services for the Pearland Independent School District suggests the following: 1. Funding should be increased to aid the homeless population as the Annual Point-in-Time Count reveals thousands of Texans are still experiencing homelessness or housing instability because of Hurricane Harvey; 2. Funding should be increased to at least $50 million for Homelessness Prevention Programs to include short-term mortgage assistance, utility assistance, and rental assistance for households still recovering from Hurricane Harvey; and 3. The plan should designate funding amounts to certain school districts impacted by Hurricane Harvey to be used for land improvement as well as directly for student and family needs for the Homelessness Prevention Program.

Staff Response: The Texas General Land Office recognizes the homelessness and housing instability issues either directly or indirectly caused by Hurricane Harvey. As a result, the GLO has worked to include a portion of CDBG-DR funding for programs that would have a meaningful and positive impact on those affected. All comments that present a suggested change to the current distribution calculations will be given adequate consideration as the GLO works to ensure an effective and efficient recovery process. It is the intent of the GLO to procure a vendor(s) to implement this program. The GLO encourages all entities that are capable of administering this program to participate in the procurement.

Comment Received: Woodsboro and Bayside should be considered for funding as they need help to rebuild after Hurricane Harvey.

Staff Response: The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All

feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Bayside and its zip code, 78340, were nearly wiped off the map and neither are included in this Action Plan. Why?

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please reconsider the method of distribution and include the county of Refugio as a whole.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: HGAC requests an extension of the public comment period for an additional 15 days for the State of Texas Plan for Disaster Recovery: Hurricane Harvey – Round 1.

Staff Response: The Texas General Land Office has, in accordance with the guidelines established by the Federal Register associated with this allocation, conducted the required public comment period to meet the public participation requirement under the law. Additionally, the GLO extended that period and accepted public comment up and until May 1, 2018 at 5:00 pm. Extending the public comment period any longer would prevent the GLO from meeting the due date for submission of the Action Plan to the U.S. Department of Housing and Urban Development.

Comment Received: Please include Bayside and all of Refugio County in the method of distribution for this action plan.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Hurricane Harvey has exacerbated the homelessness issues in Houston and the GLO should consider revision the allocation of funds to ensure homelessness prevention is adequately funded.

Staff Response: The Texas General Land Office is dedicated to ensuring that all of those impacted by Hurricane Harvey have a stable path to recovery, including those who were either homeless at the time of landfall and those who were made homeless as a result of the storm. The City of Houston is receiving a direct allocation of CDBG-DR funds from the GLO. The City of Houston will determine the homelessness programs and funding they will offer.

Comment Received: Please consider canal cleanup as a part of the recovery efforts as they are currently very littered and a hazard to boaters and swimmers in and around Rockport, Fulton, Lamar, Holiday Beach, and Copano Ridge areas.

Staff Response: Local communities will prioritize the use of CDBG-DR funds allocated to them for infrastructure projects. The Texas General Land Office remains committed to ensuring all CDBG-DR funds associated with this Action Plan are administered in a manner that is both in compliance with federal law and fosters an effective and efficient long-term recovery for each community. The GLO will work continue throughout the recovery process to work with local communities to ensure that their most pressing needs are met and addressed to the greatest extent allowable under the law and subject to limited funding.

Comment Received: The TMHA applauds the Texas General Land Office for including manufactured home replacement as an eligible activity within the Action Plan. TMHA support providing homeowners facing 'Major-High' and 'Severe' damage to their manufactured homes with the choice to replace their homes with a new manufactured home.

Staff Response: The Texas General Land Office is committed to pursuing all available aspects of disaster recovery to ensure impacted Texans have access to the most efficient recovery programs.

Comment Received: THMA requests that the GLO include manufacture homes as an option for replacement and new construction choices throughout recovery programs. This suggestion includes utilizing manufactured housing not only as replacements for damaged or destroyed manufactured housing units, but also for replacement of damaged or destroyed site-built homes.

Staff Response: The Texas General Land Office shall consider the feedback provided in this comment as it moves forward with the development of housing programs encompassed in this Action Plan.

Comment Received: Modern manufactured homes can be built to look indistinguishable from site-built counterparts and this should be considered as the GLO works to implement these programs an eliminate the stigma often associated with manufactured home.

Staff Response: The Texas General Land Office is committed to ensuring impacted Texans have access to the most efficient means of disaster recovery available. As programs develop, the GLO shall dedicate necessary resources to ensure public outreach that addresses issues like these is conducted.

Comment Received: The manufactured housing industry in the State of Texas is adequately regulated via the HUD code and TDHCA regulations. These regulations present a highly regulated industry that proves to be efficient.

Staff Response: The Texas General Land Office will give this comment adequate consideration as it moves forward with housing programs.

Comment Received: Manufactured homes are often more suited for increased elevation requirements compared to other single-family housing options.

Staff Response: The Texas General Land Office will give this comment adequate consideration as it moves forward with housing programs.

Comment Received: While TMHA believes that local control is necessary to tailor programs to the needs of a community, it would like to advocate against jurisdictions making blanket prohibitions against the use of manufactured housing units.

Staff Response: The Texas General Land Office recognizes that there must be a balance between the exercise of local control and the satisfying of the needs of impacted citizens within a community. That being said, the GLO shall continue to coordinate with local officials to ensure that this balance remains intact as the recovery process progresses.

Comment Received: Woodsboro is a small town with limited resources that was heavily damaged by Hurricane Harvey. The City of Woodsboro and the zip code 78393 should be added to the Action Plan to receive funds under this allocation.

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: All households that sustained damage from Hurricane Harvey should be eligible for all funding allocated under this Action Plan. Additionally, Mayor Turner and the City of Houston have been hostile in their response to citizen's questions during a meeting held at Tallowood Church and West Houston does not trust him to manage the program.

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston shall receive a direct allocation of CDBG-DR funds to aid its citizens in recovery. The Texas General Land Office, however, will retain oversight and audit functions to ensure allocated funds are distributed in a manner that is in compliance with federal law.

Comment Received: Round 1 fails to assess the needs of individuals with disabilities impacted by the disaster. We offer the following specific comments to this second plan, the GLO did not outreach to any disability organization to access the needs of individuals with disabilities. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office has, as required by the Federal Register, conducted a robust public participation process throughout the Action Plan process. This public participation process has included hundreds of phone calls and in-person meetings with leaders from the majority of impacted communities in an effort to address the specific needs of their impacted population.

Comment Received: The draft plan does not account for children under 5 with disabilities or those over 65 with disabilities. ***(Multiple respondents provided this feedback)***

Staff Response: The GLO has utilized the most up-to-date data available to its office in conducting all analysis associated with forming a needs assessment for the CDBG-DR funding allocated under this plan. As recovery progresses, a more detailed look into the needs of the population of persons with disabilities in each impacted area will be assessed and the GLO will continue to work to create innovative solutions to meet those needs.

Comment Received: The draft plan does not include efforts to increase accessibility and assure compliance with state and federal laws and regulations relating to new construction, substantial rehabilitation, and infrastructure projects.

Staff Response: All CDBG-DR funds are, at every program level, subject to the rules and regulations presented under federal law as they pertain to protecting and providing services to aid persons with disabilities within the impacted population. Additional detail will be provided in each programs' guidelines. Any programmatic decisions regarding establishing policies and procedures that exceed the minimum established services and protections provided under federal law will be given adequate consideration moving forward.

Comment Received: Each grantee should be required to remain in compliance with the Americans with Disabilities Act of 1990 (42 USC §§12101 et seq.) and the Rehabilitation Act of 1973 (29 USC §§701 et seq.) by provided certifications of support. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office is dedicated to ensuring the needs of impacted Texans are adequately assessed and addressed through the administration of the CDBG-DR funds associated with this Action Plan. The feedback presented in this comment will be thoughtfully considered as program guidelines are developed.

Comment Received: Cities and Counties should be given the choice to manage their own housing programs. Why are Harris County and the City of Houston being treated differently? These direct allocations were not outlined in the Federal Register, so where did this originate?

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston and Harris County shall receive direct allocations from the money allocated within this Action Plan. Although not outlined in the Federal Register, this decision was made at the senior level of the U.S. Department of Housing and Urban Development and The Texas General Land Office is obliged to ensure that all funds are administered in accordance with federal guidelines and law.

Comment Received: Chambers County feels that local administration of housing programs would create a more robust program that would serve homeowners better.

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston and Harris County shall receive direct allocations from the money allocated within this Action Plan. Although not outlined in the Federal Register, this decision was made at the senior level of HUD and The Texas General Land Office is obliged to ensure that all funds are administered in accordance with federal guidelines and law.

Comment Received: It is the understanding of Chambers County that HUD mandated the Individual Housing Program, but that requirement is not published in the Federal Register. Where did this requirement originate?

Staff Response: The U.S. Department of Housing and Urban Development has determined that an Individual Housing Program be conducted utilizing the money allocated within this Action Plan. Although not outlined in the Federal Register, this decision was made at the senior level of HUD and The Texas General Land Office is obliged to ensure that all funds are administered in accordance with federal guidelines and law.

Comment Received: Will the GLO adjust its administration amount in light of the direct allocations given to the City of Houston and Harris County?

Staff Response: The Texas General Land Office shall remain the primary administrator of programs developed under this Action Plan. The majority of tasks performed by either the City of Houston or Harris County personnel will be Project Delivery in nature. As those entities define the programs being implemented adjustments in administrative funds may become necessary.

Comment Received: I believe that any engineering studies should be conducted by private engineering firms that have requisite experience, adequate knowledge, and existing data of pertinent information to complete studies in a timely manner instead of using the engineering departments of Texas research institutions.

Staff Response: The Texas General Land Office has determined that leveraging research institutions and/or vendors within the state is a productive and beneficial use of CDBG-DR funds in developing relevant studies relating to disaster recovery programs. The GLO recognizes the value of coordinating with local experts to ensure this process is effective and efficient and remains open to fostering beneficial working relationships between research institutions and agencies like those addressed in this comment.

Comment Received: There is much damage in Refugio County, can it be included in the allocation of funds? ***(Multiple respondents provided this feedback)***

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process; however, certain eligibility criteria have been established by HUD and the GLO is committed to ensuring that all CDBG-DR funds are administered in compliance with that law. Despite this, the GLO will continue to advocate for all impacted Texans as the recovery process continues.

Comment Received: The City of Dickinson would like to express, through the five submitted letters and one resolution, its strong opposition to unequal treatment afforded to it in relation to the City of Houston and Harris County. Whereas both of these entities are proposed to be afforded the ability to control their programs locally, the City of Dickinson is not. The City of Dickinson requests the same opportunity to oversee its own programs.

Staff Response: The U.S. Department of Housing and Urban Development has, through the Action Plan and the issuance of other opinions, designated the City of Houston and Harris County as

qualified to receive a direct allocation of CDBG-DR funds. The GLO, as the primary agency providing oversight for all CDBG-DR funds expended in the state, is obliged to ensure that all funds are administered in a manner that is consistent with the U.S. Department of Housing and Urban Development policy and federal law. Despite this, the GLO remains dedicated to advocating for all impacted Texans and shall, through state wide program administration, work closely with communities to ensure recovery programs are tailored to the individual and unique needs of the community. Communities will have authority within the CDBG-DR regulations to determine prioritization of the buyout and acquisition and infrastructure funds allocated to them through the regional methods of distribution.

Comment Received: My husband, who is retired, and myself, soon-to-be-retired, were flooded during Hurricane Harvey. The first floor of our home was destroyed and we have had to utilize an SBA loan and credit cards to pay for repairs. We are very concerned that we will be unable to pay off all of the debt that we are accruing trying to recover. Please let us know if we are able to get any grant funds.

Staff Response: The Texas General Land Office has presented, through this Action Plan, several ways in which homeowners may qualify for grant assistance. Depending on where you live, potential grants may be administered by the GLO, Harris County, or the City of Houston. Once recovery programs are started each of these entities will make every effort to ensure that impacted citizens are aware of their recovery options. The GLO remains committed to ensuring impacted Texans are, to the greatest extent allowable under the law, given every opportunity to utilize grant funds to foster an effective and efficient recovery process.

Comment Received: Review and change the LMI criteria as residents in Polk County who would qualify as LMI in other counties do not qualify as LMI as Polk County has lower income levels as a whole.

Staff Response: The calculation for low- or moderate-income is defined by the U.S. Department of Housing and Urban Development and the GLO does not have the authority to utilize another methodology. This may however be developed into an argument for a waiver specific to certain areas or the entire state.

Comment Received: Reduce the 70% LMI objective to 50%.

Staff Response: The requirement that 70% of the aggregate amount of funds be utilized to benefit the low- or moderate-income population within the disaster impacted area is a requirement set by the U.S. Department of Housing and Urban Development. The GLO, as an administrator of CDBG-DR funds, is obliged to implement disaster recovery programs in a manner consistent with current federal law.

Comment Received: Review and reduce the LMI objective for infrastructure projects.

Staff Response: The requirement that 70% of infrastructure funds be utilized to benefit the low- or moderate-income population within the disaster impacted area is a requirement set by the U.S. Department of Housing and Urban Development. The GLO, as an administrator of CDBG-DR funds, is obliged to implement disaster recovery programs in a manner consistent with current federal law. Any waiver requests to change federal requirements will be conducted at the sole discretion of the

GLO. It should be noted that the granting of any requests remains at the sole discretion of the U.S. Department of Housing and Urban Development.

Comment Received: The storm surge brought in by Hurricane Harvey had a devastating impact on the harbor entrance at Port Mansfield and on the navigational fairway at Mansfield Cut. The exclusion of these areas from the allocation will have a permanent negative impact on the local economy of the State's poorest county and on the local marine life.

Staff Response: The Texas General Land Office remains committed to accurately assessing the needs of impacted communities as recovery programs are designed and implemented. The GLO, through the public comment process, has been made aware of local issues that would otherwise not be highlighted and it will take this feedback and work to address these concerns in the most effective manner possible. Local communities will prioritize the use of CDBG-DR infrastructure funds allocated to them through the regional methods of distribution subject the all federal regulations.

Comment Received: The City of Grapeland requests, in order to maximize the effectiveness of recovery funds that are allocated to our region, the following: 1. The criteria used to determine a person's low- and moderate-low (MI) status discriminates against the lo-income residents of our region and an alternative should be used; 2. The 70% LMI objective should be reduced to a more reasonable 50%; and 3. The LMI National Objective for Infrastructure Projects should be relaxed.

Staff Response: The Texas General Land Office, as the primary administrator of the CDBG-DR funds associated with this Action Plan, is committed to the utilization of all funds in a manner that is consistent with established federal law and guidelines. To that end, the U.S. Department of Housing and Urban Development has established all regulations relating to low- and moderate-low income calculations, the 70% of the aggregate requirement, and the meeting of the low- or moderate-income National Objective.

Comment Received: The focus on housing restoration with an emphasis on low- and moderate-income Texans is crucial to long-term economic recovery for all impacted areas. Nonprofit Owner-Builder Housing Providers (NOHPs) are uniquely capable of providing unmet needs for Harvey affected communities. Habitat for Humanity requests the GLO to administer state-run programs in partnership with NOHPs.

Staff Response: The Texas General Land Office is committed to leveraging experience and expertise of varying organizations to produce the most efficient and effective disaster recovery process possible. The feedback provided in this comment will be given thoughtful consideration and the GLO encourages organizations like Habitat for Humanity to remain vigilant in responding to procurement opportunities posted by the GLO.

Comment Received: Please consider distribution of funds to have them go to all Harvey/COE flood victims regardless of income level. Please reconsider the fund distribution to make it available to all impacted.

Staff Response: The Texas General Land Office is dedicated to ensuring that, subject to federal regulations, the needs of impacted communities are adequately addressed. The requirement that 70% of the aggregate of funding be used to aid the Low- and moderate-income population in the impacted

area has been established in the Federal Register in which this allocation was published and must be followed.

Comment Received: The City of Cleveland was unable to download the Action Plan, but would like to provide the following: What is the justification for allowing Harris County and the City of Houston 45% of the total funds?

Staff Response: The U.S. Department of Housing and Urban Development has, through its issuance of guidance regarding the Action Plan, determined that the City of Houston and Harris County will receive direct allocations under this grant. The Texas General Land Office, as the primary oversight agency for these funds, is obliged to implement this grant in accordance with that guidance and federal law.

Comment Received: What will the process be to determine which planning studies are pursued and will priority be given to regional projects? Will studies for cities also be eligible?

Staff Response: The Texas General Land Office is currently designing the planning studies process and will present further in-depth program guidelines as soon as they become available. It can be relayed, however, that each proposed planning study will be given adequate consideration as both regional and local studies are eligible for funding. As of the date this response was drafted, there is no prioritization of proposals and each proposal will be evaluated on its own merit before a decision is made.

Comment Received: Will local buyouts and acquisition programs be run at the local or state level? If administered at the local level, will that locality receive an allocation subject to the COG MOD?

Staff Response: Local buyout and acquisition programs will be allocated through regional methods of distribution to cities, counties and entities with eminent domain authority for local implementation.

Comment Received: CDBG-DR funds should be distributed based on loss and not income as defined by the 70% LMI rule.

Staff Response: The Texas General Land Office is dedicated to ensuring that, to the greatest extent possible, the needs of impacted communities are addressed; however, the administration of CDBG-DR funds must be done in accordance with federal law. The requirement that 70% of the aggregate of funding be used to aid the Low- and moderate-income population in the impacted area has been established in the Federal Register in which this allocation was published and must be followed.

Comment Received: Refugio County has been largely left out of the plans for assistance. Our community will NEVER recover without state/federal assistance.

Staff Response: The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process subject to the U.S. Department of Housing and Urban Development's most impacted definitions. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: My home, after living in it for 23 years, was flooded when local authorities decided to release water from a reservoir in West Houston. My home was flooded because of the decision of a government agency. To add insult to injury, another government agency has decided that the zip code in which my home is located is not worthy of assistance and, on top of that, I would not qualify for aid under this grant because of my income. I am a single mother who raised four children in this home and now I struggle to pay the mortgage, pay rent on an apartment to live in, and am slowly draining my savings. Please do not permit The City of Houston and Mayor Turner to handle these funds as they have clearly disregarded citizens like myself from the start. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office is committed to administering CDBG-DR funds in a manner that is in compliance with federal law. To date, HUD has solidified a determination that certain areas (counties and zip codes) are eligible to participate in programs under this grant. Despite this, the GLO remains an advocate for citizens like yourself as we seek to ensure all impacted Texans are presented with an avenue for meaningful disaster recover. The feedback presented in this comment will be given adequate consideration moving forward.

Comment Received: My sister-in-law's home was flooded during Hurricane Harvey when water was released from a reservoir in West Houston sending 4 ½ feet of polluted water into her home for 12 days. Her zip code (77079) is not listed as eligible to receive funding under the current Action Plan. This program should be open to all who flooded, regardless of zip code or means testing. The City of Houston should not be permitted to administer their own program either.

Staff Response: Anyone living in Harris County will be eligible for assistance under this program subject to the federal regulations governing the funds. Harris County and the City of Houston will be designing programs to support the recovery needs within their jurisdictions.

Comment Received: Waller County is requesting the State of Texas General Land Office exercise maximum flexibility in administering the CDBG-DR funds associated with this Action Plan in requesting a waiver of the 70% LMI overall benefit requirement. Waller County would like to propose, in addition to this waiver, a replacement distribution ratio of 50% for the benefit of LMI households and 50% for the benefit of non-LMI households.

Staff Response: The requirement that 70% of the aggregate amount of funding associated with this Action Plan be utilized in a manner that benefits the Low- and Moderate-Income population within the impacted area is established by the U.S. Department of Housing and Urban Development via the Federal Register. The Texas General Land Office, as an administrative body for these funds, is obliged to implement programs in compliance with all federal. The GLO shall, however, continue to advocate for all impacted Texans and will seek every option for effective recovery if there is compelling evidence that the requested option is both warranted and necessary.

Comment Received: Chambers County is requesting the State of Texas General Land Office exercise maximum flexibility in administering the CDBG-DR funds associated with this Action Plan in requesting a waiver of the 70% LMI overall benefit requirement. Chambers County would like to propose, in addition to this waiver, a replacement distribution ratio of 50% for the benefit of LMI households and 50% for the benefit of non-LMI households.

Staff Response: The requirement that 70% of the aggregate amount of funding associated with this Action Plan be utilized in a manner that benefits the low- and moderate-income population within the impacted area is established by the U.S. Department of Housing and Urban Development via the Federal Register. The Texas General Land Office, as an administrative body for these funds, is obliged to implement programs in compliance with all federal. The GLO shall, however, continue to advocate for all impacted Texans and will seek every option for effective recovery if there is compelling evidence that the requested option is both warranted and necessary.

Comment Received: As a survivor of Hurricanes Carla, Katrina, Ike, and Harvey, I disagree with the disproportionate distribution of the CDBG-DR allocation that gives Houston significantly more money than smaller, poorer, and more devastated communities like Galveston, Brazoria, Wharton, etc. Please correct this unfair, discriminating, and inhumane decision by reallocating these dollars immediately.

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston and Harris County will each be direct recipients of the amount of funds discussed in this Action Plan using the U.S. Department of Housing and Urban Development allocation formula for states. The Texas General Land Office, as the primary administrator of these funds, is dedicated to ensuring all funds are utilized in accordance with the regulations and guidelines established by U.S. Department of Housing and Urban Development, but will continue to advocate for all Texans who were impacted by Harvey. The GLO is committed to rebuilding every community and working to ensuring that Texans are more prepared for the next disaster within the funds provided.

Comment Received: It is recognized that the GLO did a better job at meeting it local government partners and some non-profit organizations, but we believe future plans would also benefit from more public participation. We hope the GLO will encourage The City of Houston and Harris County to hold their own public meetings regarding their funding.

Staff Response: The Texas General Land Office will work in coordination with the City of Houston and Harris County to ensure that their programs are implemented in a manner that satisfies the federal public participation requirements at both the local and state level.

Comment Received: The GLO and The State of Texas need to formally recognize the impacts of climate change in designing recovery programs.

Staff Response: The GLO will take this comment into consideration moving forward with disaster recovery.

Comment Received: We urge the GLO not to be more detailed in its development of an infrastructure plan as the Action Plan merely lists potential projects. We would also suggest the GLO prioritize all funding to housing and related infrastructure in response to the actual hurricane, versus spending money on infrastructure projects designed to mitigate damage from future storms.

Staff Response: The Texas General Land Office shall work in coordination with impacted communities to ensure that any infrastructure projects proposed are specifically tailored to the needs of that community. These needs include rebuilding what was lost as well as strengthening for resiliency to ensure damages from the next major storm are mitigated.

Comment Received: The GLO should conduct a cost benefit analysis on every proposed infrastructure project.

Staff Response: The Texas General Land Office or, in the case of the direct allocations, The City of Houston or Harris County shall evaluate each proposed project on its merits before approval within CDBG-DR regulations.

Comment Received: We suggest that the purchasing of land to be used as a flood control measure be added as an eligible activity.

Staff Response: As presented under the Action Plan, buyouts programs are eligible activities for communities under this grant. In utilizing a buyout program, the purchased land may not be built on and must be used as either green space or for some other method of flood mitigation.

Comment Received: Prioritizing the needs of LMI households and communities.

Staff Response: The Federal Register associated with this Action Plan specifically designates 70% of the aggregate of funds be utilized for the benefit of the low- or moderate-income population within the impacted areas.

Comment Received: Incorporating principles relating to environmental justice in every program.

Staff Response: The GLO will meet all environmental compliance required by the CDBG-DR program and give the feedback contained within this comment thoughtful consideration moving forward.

Comment Received: Prioritizing the rebuilding of affordable rental housing.

Staff Response: As stated in the Action Plan, the primary focus of this allocation is housing with 70% of the aggregate directed towards the low- or moderate-income population. The GLO has set aside $250 million for this purpose and plans to prioritize its implementation.

Comment Received: Prioritizing construction and reconstruction that leads to more resilient buildings

Staff Response: All construction and reconstruction of structures shall be done in a manner that promotes more resilient buildings in accordance with local code and zoning and construction guidelines to be issued at the program level. The Action Plan also calls out specific improvements for reconstructed and new construction.

Comment Received: Address hazard mitigation to eliminate the impact from future pollution from future events.

Staff Response: The GLO will take this feedback into consideration as it moves forward with the disaster recovery process.

Comment Received: Ensure buyout programs provide families with the funding to relocate.

Staff Response: All buyout programs must be conducted in a manner that complies with federal relocation laws. These laws include provisions that provide for relocation assistance and guidance.

Comment Received: Assuring that the majority of funding for buyouts is focused on LMI families.

Staff Response: As stated in the Action Plan, 70% of the aggregate amount of funding must be utilized for the benefit of the low- or moderate-income population in the impacted area.

Comment Received: Incorporate equity into programs as a best practice.

Staff Response: The GLO, in implementing all CDBG-DR programs, remains committed equitable treatment of all applicants in all of its programs. This includes adherence to all federal laws prohibiting discrimination based on protected class status.

Comment Received: Emphasize mitigation and resilience.

Staff Response: Mitigation and building in resilience continue to be eligible uses in the administration of all CDBG-DR funds.

Comment Received: Provide training on civil rights requirements for local grantees.

Staff Response: All local grantees shall be made aware of their legal obligations under federal law when implementing grant funds.

Comment Received: Reaffirm the State's commitment to ensuring all impacted Texans benefit equally from these funds.

Staff Response: The GLO remains committed to ensuring impacted Texans benefit equally, as allowed under the law, from the limited funds associated with this Action Plan.

Comment Received: The GLO should match local elevation standards within its programs.

Staff Response: The GLO shall utilize the elevation standards presented in the Federal Register and shall only adjust this standard if and when it can be demonstrated that local standards do not inhibit project development.

Comment Received: Buy-Outs should prioritize LMI families and include storm water controls to mitigate future flooding hazards.

Staff Response: All buyout programs shall be conducted in accordance with federal law and in compliance with the guidelines set forth in the Federal Register.

Comment Received: Sierra Club requests that buyouts serve LMI families 2:1 compared to their non-LMI counterparts

Staff Response: All buyout programs shall be conducted in accordance with federal law and in compliance with the guidelines set forth in the Federal Register.

Comment Received: We suggest that 25% of the total amount of funding be moved from infrastructure and economic revitalization and be transferred to public housing and multi-family housing.

Staff Response: The GLO has set aside affordable rental housing funds that public housing authorities impacted by Hurricane Harvey may participate in. As future funds are made available and the GLO continues to get additional data to support more funding that will also be considered.

Comment Received: New homes should be required to meet both local and federal energy and water efficiency standards.

Staff Response: New construction, as outlined in the Federal Register associated with this Action Plan, is required to meet specified energy and water efficiency standards.

Comment Received: The GLO should consider a revolving loan fund for rehabilitations.

Staff Response: This feedback will be given thoughtful consideration moving forward.

Comment Received: The GLO should prioritize community engagement throughout the disaster recovery process.

Staff Response: The GLO is dedicated to working with local communities to ensure meaningful input is received from community members regarding the use of CDBG-DR funds. All community input is carefully considered as disaster recovery must be tailored to specific communities to be successful.

Comment Received: The disaster recovery money (and the programs it funds) will create jobs that will present an overall benefit to Houston as a whole.

Staff Response: The GLO agrees with this assessment.

Comment Received: Contractors should be screened for prior violations of labor laws and monitored to prevent such violations during program implementation.

Staff Response: Contractors who seek to be utilized for work under this grant allocation do face a screening process as required by federal and state procurement law that excludes certain contractors for varying types of violations.

Comment Received: Grant funds should be leveraged towards workforce development by requiring contractors to participate in apprenticeship programs.

Staff Response: The GLO will take this feedback into consideration as disaster recovery programs develop. The GLO will ensure all Subrecipients comply with all Section 3 goals as applicable.

Comment Received: The use of all funds should include an air quality aspect to ensure residents near projects are protected

Staff Response: All CDBG-DR projects are subjected to federally outlined environmental reviews. For further detail on these environment reviews, please see 24 CFR Part 58.

Comment Received: The state should create a plan addressing relocation assistance for citizens living in communities that border polluting industries.

Staff Response: This feedback will be taken into consideration as disaster recovery projects develop. However, the GLO may not use these funds except in response to Hurricane Harvey impacts.

Comment Received: Continuums of Care (CoCs) are the regional authorities best suited to broker homelessness-related disaster recovery – both planning and funding—between state agencies and local service providers. Any effort to address disaster-related homelessness cannot be done solely at the state level.

Staff Response: The Texas General Land Office appreciates the willingness of the THN to offer support services and expertise as the Homelessness Prevention Program move forward. The GLO is committed to utilizing every resource available to form processes and procedures that foster an effective and efficient disaster recovery. The GLO would encourage all CoCs to respond to procurements related to implementation of this program.

Comment Received: The THN recommends that the three CoCs that contain CDBG-DR eligible counties be given a more central role in homelessness-related disaster recovery planning and program implementation.

Staff Response: The Texas General Land Office appreciates the willingness of the THN to offer support services and expertise as the Homelessness Prevention Program move forward. The GLO is committed to utilizing every resource available to form processes and procedures that foster an effective and efficient disaster recovery. The GLO would encourage all CoCs to respond to procurements related to implementation of this program.

Comment Received: The proposed Homelessness Prevention Program falls short in its total funding allocation, its limited geographic scope, and its lack of plan to stabilize the large number of households still in Transitional Shelter Assistance.

Staff Response: The U.S. Department of Housing and Urban Development has, through its issuance of the Federal Register notice pertaining to this specific allocation, designated particular counties and zip codes as eligible for funding. The GLO, as the primary administrator of these CDBG-DR funds, must adhere to those regulations and administer funds in accordance with federal law.

Comment Received: This Action Plan omits Bexar, Dallas, Tarrant, and Travis Counties as eligible counties for funding. The THN recommends that the homelessness prevention program be expanded to encompass the burdens faced by inland counties and municipalities.
Staff Response: The GLO may not use the CDBG-DR funds for received for Hurricane Harvey on any other purpose except response to this event.

Comment Received: This allocation does not specifically address the timely housing needs of the thousands of Texans who remain in TSA.

Staff Response: This feedback is considered valuable by the Texas General Land Office and will be given adequate consideration as the disaster recovery process develops.

Comment Received: There is a need for a formalized and coordinate disaster response plan to ensure that agencies, departments, municipalities, and service providers are working as efficiently as possible when the next disaster strikes. The THN recommends a nominal amount of funding be set aside for the development of a Texas Disaster Housing Action Plan.

Staff Response: The Texas General Land Office recognizes the need to reform and improve the disaster response and recovery process at every level. The GLO is committed to working with partners across the state to identify and rectify areas of concern. The GLO is more than willing and ready to work with partners toward this effort.

Comment Received: The THN recommends the development of an intermediate step in the planning studies process presented in the Action Plan in which municipalities, agencies, and CoCs develop community action plans based off the findings in the CDBG-DR funded studies.

Staff Response: The Texas General Land Office, though not specifically spelled out in the Action Plan, has every intention of utilizing planning studies conducted by the listed research institutions to develop recovery plans of action for each community.

Comment Received: The THN recommends that the proposed database system that will potentially house all of the planning data gathered as a result of planning studies conducted under this Action Plan include robust information on disaster-related homelessness.

Staff Response: The Texas General Land Office appreciates this feedback and will give it adequate consideration as it explores every option that has the potential to improve the disaster response and recovery processes.

Comment Received: The THN recommends that the State develop a more comprehensive data warehouse that would allow state agencies and other contributors to better understand disaster-related needs of at-risk populations.

Staff Response: The Texas General Land Office appreciates this feedback and will give it adequate consideration as it explores every option that has the potential to improve the disaster response and recovery processes.

Comment Received: The THN recommends that any data warehouse created also have a public facing portal through which Texas residents and other interested parties can view long-term data on natural and man-made disasters.

Staff Response: The Texas General Land Office appreciates this feedback and will give it adequate consideration as it explores every option that has the potential to improve the disaster response and recovery processes.

Comment Received: The THN recommends that any data warehouse created have corresponding computer and mobile-based applications for easier and more standardized collection of data.

Staff Response: The Texas General Land Office appreciates this feedback and will give it adequate consideration as it explores every option that has the potential to improve the disaster response and recovery processes.

Comment Received: The THN recommends that, in line with HUD's National Mitigation Investment Strategy, technology be given a more explicit role in infrastructure funding, particularly in the development of a data warehouse.

Staff Response: The Texas General Land Office appreciates this feedback and will give it adequate consideration as it explores every option that has the potential to improve the disaster response and recovery processes.

Comment Received: The THN recommends that the GLO be more explicit in its commitment to attending to the housing needs of people with disabilities affected by Harvey.

Staff Response: The Texas General Land Office is committed to administering all CDBG-DR funds in a manner that adheres to all federal laws. These laws include stringent protections that are in place to address to the housing needs of the population of impacted persons with disabilities.

Comment Received: The THN recommends that the GLO explicitly commit to addressing the unmet needs of ELI households in a manner at least proportionate with all LMI households' unmet needs.

Staff Response: The Texas General Land Office remains committed to helping Texans recover from Hurricane Harvey and this comment presents a unique perspective that will be given adequate consideration moving forward.

Comments Received: Allocation of Funds for Buffalo Bayou Flood Mitigation Efforts. Much of the damaged sustained by citizens in my district was caused by an overflow of flood waters from Buffalo Bayou. Investment of resources into prevention and mitigation of future flooding will reduce future costs of recovery.

Staff Response: The Texas General Land Office does not select projects but rather relies on local knowledge of need to prioritize these limited funds subject to the CDBG-DR regulations. The GLO, in its evaluation of Houston's draft action plan, will utilize this feedback and give it thoughtful consideration.

Comment Received: The requirement that 70% of the aggregate amount of funds be utilized solely for the benefit of the LMI impacted population fails to direct an adequate amount of funds to non-LMI households.

Staff Response: The requirement that 70% of the aggregate amount of funds be utilized to benefit the Low- and Moderate-Income households that were impacted by the storm has been set by the U.S. Department of Housing and Urban Development through the publication of the Federal Register associated with this allocation of grant funds. Despite this current designation, the GLO is committed to advocating for all impacted Texans and is willing, if deemed necessary and justified, to seek a waiver to this requirement as the recovery process develops.

Comment Received: Clarification of the maximum assistance waiver criteria and process as it is permitted to be developed by sub-recipients of CDBG-DR dollars.

Staff Response: The Texas General Land Office will, as programs and policies are developed, coordinate with communities to ensure they are aware of all policies associated with programs. This will include the amount of maximum assistance allowable under each program.

Comment Received: Aransas County believes that it is in a better position to implement a housing plan locally and is willing to develop a formal delegation of authority in the form of an MOU if necessary.

Staff Response: The U.S. Department of Housing and Urban Development has, through the Action Plan and the issuance of other opinions, designated the City of Houston and Harris County as qualified to receive a direct allocation of CDBG-DR funds. The GLO, as the primary agency providing oversight for all CDBG-DR funds expended in the state, is obliged to ensure that all funds are administered in a manner that is consistent with the U.S. Department of Housing and Urban Development policy and federal law. Despite this, the GLO remains dedicated to advocating for all impacted Texans and shall, through state wide program administration, work closely with communities to ensure recovery programs are tailored to the individual and unique needs of the community. No other communities will be directly implementing their housing programs.

Comment Received: How can the GLO and Aransas County work to keep recovery efforts better aligned? Is the GLO willing to partner with Aransas County to establish an active MOU to achieve this?

Staff Response: The GLO will execute Subrecipient Agreements with communities allocated funds for both buyout and acquisition and infrastructure funds. The GLO is committed to working closely with impacted communities to ensure their recovery needs are adequately met in the most efficient and effective manner possible.

Comment Received: Will local governments be given the chance to choose from a pre-vetted list of administrators derived from the GLO's RFQ No. X0014574-AW?

Staff Response: All vendor procurement necessary for project implementation must be locally procured by Subrecipients. The GLO is only procuring vendors for its own use.

Comment Received: Infrastructure funding is a major concern as a lack of current adequate infrastructure presents a significant barrier for construction of workforce housing. The funding of infrastructure would also allow a 'buy done' to meet workforce housing goals.

Staff Response: Communities will prioritize the use of infrastructure funds allocated to them subject to the CDBG-DR regulations. The Texas General Land Office shall give ample consideration to all feedback provided by communities that address their individualized needs for recovery. The information provided in this comment will be utilized moving forward as programs develop.

Comment Received: Please consider funding infrastructure improvements to address infill and redeveloped housing.

Staff Response: Communities will prioritize the use of infrastructure funds allocated to them subject to the CDBG-DR regulations. The Texas General Land Office shall give ample consideration to all feedback provided by communities that address their individualized needs for recovery. The information provided in this comment will be utilized moving forward and programs develop.

Comment Received: Please clarify 'local government'. Will the County/Cities be working directly with the State?

Staff Response: The Texas General Land Office will contract directly with cities and counties for hurricane recovery efforts. This effort includes coordination with cities and counties to ensure the needs of every disaster impacted Texan are addressed.

Comment Received: Please consider expanding the rehab and reconstruction program beyond those victims who received Individual Assistance.

Staff Response: An applicant does not have to be a FEMA Individual Assistance participant to be eligible for housing assistance from the CDBG-DR funds.

Comment Received: Has down payment assistance been considered for survivors that are not under the buyout program? If so, what is the criteria?

Staff Response: Individual Subrecipients operating buyout and acquisition programs may include down payment assistance from the CDBG-DR funds.

Comment Received: How will the regional method of distribution be addressed in the Coastal Bend Council of Governments? What is that formula?

Staff Response: The CBCOG will be responsible for developing the regional method of distribution through a public process that is currently beginning.

Comment Received: For those programs that are 'in partnerships with COGs', how will feedback for community needs be handled by CBCOG?

Staff Response: The CBCOG will be responsible for developing the regional method of distribution through a public process that is currently beginning.

Comment Received: Can repair and replacement of manufacture housing units include relocation to non-floodplain sites? Could funding be used to establish a manufactured home park with adequate public sewage and mitigation improvements?

Staff Response: This type of program could potentially be funded from infrastructure funds allocated to Subrecipients from the regional methods of distribution.

Comment Received: If the GLO intends to administer a state level housing program, will local governments get the opportunity to develop housing standards that are relevant to the areas long term goals?

Staff Response: The Texas General Land Office is committed to working with impacted communities to ensure all recovery efforts are tailored to the specific needs of their citizens. This

joint effort will include the development of programmatic processes and procedures that will be determined at a later date

Comment Received: Aransas County highly supports the portion of the economic development program that offers deferred forgivable loans.

Staff Response: The Texas General Land Office appreciates this feedback.
Comment Received: Can we include Bayside, TX and Refugio County in this allocation?

Staff Response: Refugio County is eligible as a county with a federal disaster declaration from Hurricane Harvey. The Texas General Land Office has worked diligently to ensure that all communities impacted by Hurricane Harvey are given consideration during the method of distribution process. All feedback pertaining to the MOD will be given ample consideration as the GLO wants to ensure that all Texans impacted by Hurricane Harvey are given adequate opportunity to recover.

Comment Received: Please distribute the individual needs assessments for each county, city, or community. What will the housing recovery plan under the GLO look like for Galveston County? What are the dollars v. projected home builds?

Staff Response: The Texas General Land Office will work in close coordination with impacted regions to ensure that housing recovery programs are designed to meet the needs of that region. These policies and processes will be developed in a collaborative effort and work to ensure an ongoing relationship that fosters an effective and efficient disaster recovery.

Comment Received: How will the imposition of the 70% overall benefit rule for the LMI population help all of the impacted areas?

Staff Response: The 70% aggregate requirement has been established by the U.S. Department of Housing and Urban Development and the GLO, as an administrator of these grant funds, is obliged to implement programs that are in compliance with this requirement as it is the law. If and when the U.S. Department of Housing and Urban Development, within its sole discretion, were to grant a waiver altering these percentages, then the GLO would ensure all communities are made aware and all programs would reflect those changes.

Comment Received: For those areas not participating in a buyout and/or acquisition program, can those funds be redirect for other programs?

Staff Response: The GLO plans for the funding levels for each program to remain constant until that particular needs is met for the entire region.

Comment Received: What information will be utilized in determining community shares for HGAC communities?

Staff Response: HGAC will be responsible for the development of the regional method of distribution through a public process that is currently beginning.

Comment Received: What are the socioeconomic factors the GLO speaks of and how will those impact funding to the most impacted areas?

Staff Response: HGAC will be responsible for the development of the regional method of distribution through a public process that is currently beginning

Comment Received: Why would a state run program be administered instead of one run by local governments?

Staff Response: The Texas General Land Office, as the primary administrator of CDBG-DR funds for the State of Texas, is committed to ensuring each impacted community retains the most local control feasible in determining the most effective use of disaster recovery funds while complying with the U.S. Department of Housing and Urban Development preferences for program implementation. The GLO shall continue to work with each impacted community, regardless of which entity is considered the primary administrator of the program, to ensure an efficient and effective recovery.

Comment Received: What is available through the Action Plan to help Galveston recover its loss of revenue caused by the impact on tourism in the area?

Staff Response: The GLO does not have a program specifically designed to meet this need. The County could perhaps explore using any infrastructure funds to consider this need with adequate documentation.

Comment Received: Can a county, city, or government request a waiver to run its own housing program?

Staff Response: To date, the Texas General Land Office is not accepting waivers for counties, cities, or local governments to run their own housing recovery program.

Comment Received: Was the option to locally run a housing program, like Houston and Harris County, presented to other areas?

Staff Response: The City of Houston and Harris County have been designated by the U.S. Department of Housing and Urban Development as eligible to be direct recipients and administrators of grant funds for disaster recovery. The Texas General Land Office has made no such presentation to any potential subrecipient and the decision to directly allocate funds was made at the federal government level. This does not, however, imply that the GLO will not be actively involved in monitoring these Harris County and the City of Houston funds to ensure that they are administered in a manner that complies will all aspects of federal law.

Comment Received: Local governments should be fully satisfied with state run programs before the state should be permitted to implement programs with a potential third round of grant money.

Staff Response: The Texas General Land Office, in its administration of CDBG-DR funds, will be periodically subjected to several types of reviews and audits by the U.S. Department of Housing and Urban Development aimed at gauging compliance with the federal law. The GLO, only through the approval and performance ratings from the U.S. Department of Housing and Urban Development, shall retain its duty to administer CDBG-DR funds. The GLO shall, however, remain open to all feedback from communities as refining processes and policies in a manner that fosters a better recovery for impacted Texans is one of our highest priorities.

Comment Received: Can a waiver to section 582 be considered for building in a floodplain?

Staff Response: The GLO will need more information regarding section 582 before a waiver may be considered.

Comment Received: Will CDBG funds be available if programs move families out of the area and alter the tax base and tax revenue?

Staff Response: The GLO does not have a program specifically designed to meet this need. The County could perhaps explore using any infrastructure funds to consider this need with adequate documentation.

Comment Received: Will the GLO seek approval and input from local governments when developing Affordable Housing Programs?

Staff Response: The Texas General Land Office will absolutely seek input from local communities and citizens when developing Affordable Housing Programs. As a part of a robust citizen participation process, the GLO shall make every effort to allow a community present its comments and concerns so each housing program may be tailored specifically for the needs of that area.

Comment Received: Why will waivers not be accepted concerning the exclusion from funding of buildings generally used to conduct government business?

Staff Response: the U.S. Department of Housing and Urban Development has not provided for this waiver as they have in the past. If a community has a specific need they to present evidence to the GLO for consideration to submit to the U.S. Department of Housing and Urban Development.

Comment Received: Please define the GLO's administrative funding amount and release an administrative budget.

Staff Response: The Texas General Land Office shall, as it has with prior grants, will remain within the prescribed caps for Administrative, Project Delivery, and Housing presented under federal law. Any funds not utilized for those purposes will be converted to additional project dollars.

Comment Received: Please share any information pertaining to the administrative funding currently projected to be used by the City of Houston and Harris County.

Staff Response: The Harris County and the City of Houston programs have not been defined so their needs of administrative funds have not been determined.

Comment Received: Will the GLO hold public meetings in the impacted communities?

Staff Response: The Texas General Land Office is committed to ensuring local communities are given ample opportunity to understand each aspect of the recovery process. The GLO has a plan for various meetings to present and discuss the Action Plan programs to communities.

Comment Received: Will the GLO request a waiver of the 70% LMI benefit requirement?

Staff Response: The Texas General Land Office, along with any other subrecipient of CDBG-DR grant funding, is required to administer those funds in accordance with current federal law. Absent compelling evidence that the current requirements present a significant impediment to the disaster recovery process. Despite this, the GLO shall continue to advocate for impacted Texans and is willing to revisit this subject if and when the circumstances discussed present themselves.

Comment Received: Will the comment period be extended from 14 days to a full 30 days?

Staff Response: The Texas General Land Office has, in accordance with the guidelines established by the Federal Register associated with this allocation, conducted the required public comment period presented as sufficient to meet the public participation requirement under the law. Additionally, the GLO extended that period and accepted public comment up and until May 1, 2018 at 5:00 pm.

Comment Received: Hello, I am an immigrant from Vietnam who came to the USA in 1981 and moved to Houston with my husband in 1997. We purchased a home in the Memorial Bend subdivision, which is located in the 500-year floodplain, but it had never flooded before. Hurricane Harvey rains combined with multiple reservoir released caused our home to flood. Our home flooded and we lost everything: our home, all the contents, memorable pictures, and our cars. My family is still displaced and we are stressed emotionally, physically, and financially. My husband and I are good citizens. We work hard, pay our taxes, and haven't had to ask for handouts. We are asking to be fairly compensated for our losses from the CDBG-DR funds.

Staff Response: The Texas General Land Office remains dedicated to ensuring families like yours are given ample opportunity, to the extent allowed under the law, to recover from the effects of Hurricane Harvey. The GLO will continue to work with your local community leaders to build recovery programs that foster the most efficient and effective recovery possible.

Comment Received: All levels of government should be involved in the recovery process and public input should at every stage of the recovery process.

Staff Response: The Texas General Land Office is committed to developing ongoing relationships with impacted communities to ensure all recovery programs are administered in a manner that is most beneficial to each specific community. This includes cooperation and coordination during the assessment, planning, construction, and post-construction monitoring stages.

Comment Received: To the greatest extent practicable, control and direction of programs should be devolved to the lowest level of government possible.

Staff Response: The Texas General Land Office is willing to work with all communities and provide the necessary technical assistance when required. The GLO recognizes that capacity levels differ among communities and will maintain oversight of all programs to ensure proper administration under federal law.

Comment Received: Funds should be allocated and spent at the fastest rate possible.

Staff Response: The Texas General Land Office remains committed to the efficient and effective administration of CDBG-DR funds within the bounds of federal law.

Comment Received: Programs should be developed with an eye towards local capacity, particularly the use of non-profits.

Staff Response: The Texas General Land Office is committed to leveraging local expertise and resources in a manner that fosters the most efficient and effective recovery process possible. This will include consulting with local businesses, non-profits, and other organizations to develop the most wholistic recovery possible.

Comment Received: Reference points should be added to avoid confusion as to which parts of the Action Plan will be managed by the GLO.

Staff Response: The Texas General Land Office will be primarily responsible for the administration of programs that fall outside of the boundaries of Harris County. Harris County and the City of Houston have received a direct allocation and will be the primary administrators of CDBG-DR funds for their respective jurisdictions.

Comment Received: There should be clarification as to when and how citizens may provide input into the Harris County and City of Houston Action Plans.

Staff Response: Citizen participation plans shall be developed separately by both Harris County and the City of Houston and will be published as Amendment 1 for a state wide public comment period over the coming months.

Comment Received: What is the basis for the general requirement making homeowners who make over 120% of the area median income not eligible for assistance?

Staff Response: All requirements set forth in the Action Plan are either required under federal law or have been implemented in an effort to create a more equitable recovery. This requirement was set directly by the U.S. Department of Housing and Urban Development.

Comment Received: What is the specific dollar amount of 120% of median income?

Staff Response: The specific dollar amount inquired about in this comment will vary depending on the area in which the homeowner resides.

Comment Received: 1. I would like to see more Homelessness Prevention funds and Rapid Rehousing funds be made available. 2. The Continuum of Care and Texas Homeless Network have the most desirable background and should be included in interagency cooperative planning and implementation efforts.

Staff Response: The Texas General Land Office has received the comment presented and will give them thoughtful consideration as the disaster recovery process moves forward. The GLO is dedicated to fostering an effective and efficient disaster recovery through a collaborative effort and appreciates the points made in this submission.

Comment Received: Language that results in ineligibility due to income level, flood plain location, and lack of insurance should be removed. ***(Multiple respondents provided this feedback)***

Staff Response: All requirements presented in the language addressed in this comment have been established on the federal level by the U.S. Department of Housing and Urban Development. The GLO is obliged to administer the CDBG-DR funds associated with this grant in a manner that is consistent with all current federal rules.

Comment Received: Many in Houston suffered flooding due to decisions made by the Army Corps of Engineers and Harris County Flood Control District and are engaging in legal action against these agencies and other culpable parties. Any potential award that may result from these legal actions should be specifically from the category of 'future award' and exempt under the subrogation agreement. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office recognizes the points made in this comment and will give them thoughtful consideration in consultation with the U.S. Department of Housing and Urban Development related to duplication of benefit regulations.

Comment Received: The LMI distribution should be changed from 70% of total funds to 50% of total funds. ***(Multiple respondents provided this feedback)***

Staff Response: The requirement that 70% of the aggregate amount of CDBG-DR funds be utilized to aid the low- or moderate-income population in an impacted area has been established in the Federal Register and the GLO is obliged to follow that guidance.

Comment Received: Remove language that includes an SBA loan application as a benefit/duplication of benefits. ***(Multiple respondents provided this feedback)***

Staff Response: All rules and regulations relating to SBA loans and duplication of benefits are federally established and the GLO, as the primary administrator of CDBG-DR funds, is obliged to follow those rules unless otherwise indicated by the U.S. Department of Housing and Urban Development.

Comment Received: As a flooded resident of the Fleetwood subdivision (zip code 77079) caused by the release of Barkers and Addicks dam waters, I believe that the funds should be distributed more equitably and that 70% to LMI folks is unfair.

Staff Response: The Texas General Land Office must, in accordance with the federal regulations outlined in the Federal Register notice associated with this CDBG-DR allocation, administer disaster funds consistent with the 70% low- or moderate-income requirement. This requirement is established by the U.S. Department of Housing and Urban Development and the GLO and/or any recipient of funds is obliged to administer these funds in line with that regulation.

Comment Received: Will the GLO assure local governments that it will establish a mechanism whereby CDBG-DR funds will be available to meet the 25% local share of HMGP elevation programs? Would the GLO consider making these awards directly to local governments to coordinate elevation programs?

Staff Response: The CDBG-DR funds are permitted to be used as the match for HMGP local cost share as long as the project is CDBG-DR eligible. Applying to use these funds for a match will be program specific, but there will be clear and concise instructions presented by the administrator of the program, TDEM.

Subrecipients allocated funds under the buyout and acquisition and infrastructure programs may choose to prioritize their funds toward match.

Comment Received: In regards to the State Action Plan for Hurricane Harvey Recovery, I ask for consideration for the following: 1. Review/change the current LMI criteria, 2. Review/change the 70% overall LMI benefit requirement, 3. Review/change the LMI national objective for infrastructure projects.

Staff Response: The U.S. Department of Housing and Urban Development has, through the publication of the Federal Register notice, established the low- or moderate-income determination criteria and the 70% overall low- or moderate-income benefit requirement for all projects, including infrastructure. The Texas General Land Office and any direct subrecipient must administer all CDBG-DR funds in compliance with current federal law.

Comment Received: On behalf of our member governments and citizens who are suffering from the impact of Hurricane Harvey, we offer the follow comments to the State Action Plan for Hurricane Harvey Round 1 Disaster Recovery: 1. The criteria used to determine a person's LMI status actually discriminates against the low-income residents of our region because they are looped in with the more affluent areas; 2. The 70% LMI national objective should be reduced to a more reasonable 50% to ensure flexibility needed to assist more citizens in need; 3. The LMI national objective for infrastructure projects should be relaxed to allow maximum flexibility, which in turn will benefit more LMI persons. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has, through the publication of the Federal Register notice associated with this grant, established and defined the impact area and the 70% overall low- or moderate-income benefit requirement. The U.S. Department of Housing and Urban Development defines the methodology that must be used to calculate low- or moderate-income.
The GLO shall, however, remain steadfast in its commitment to advocate for all Texans throughout the disaster recovery process and is open to reevaluating its current stance on this issue as recovery programs develop.

Comment Received: The Mayor of Houston and his staff are not competent enough to sufficiently and swiftly administer this size of a program. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has determined that The City of Houston shall receive a direct allocation of funding under this grant. Unless otherwise directed by the U.S. Department of Housing and Urban Development, the GLO will work to ensure that these funds, though administered by Houston, are given ample oversight to ensure complete compliance with federal law.

Comment Received: So far, the Mayor has diverted funds from certain zip codes and we don't want this type of bias. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston shall receive a direct allocation of funding under this grant. Unless otherwise directed by the U.S. Department of Housing and Urban Development, the GLO will work to ensure that these

funds, though administered by Houston, are given ample oversight to ensure complete compliance with federal law. The GLO is obliged to ensure lawful administration of these funds as currently defined under federal law.

Comment Received: The 70%/30% split of funds should be waived to at least 50%/50% to ensure all folks, not just LMI, can recover. ***(Multiple respondents provided this feedback)***

Staff Response: The requirement that 70% of the aggregate of funds be utilized to benefit the low- and moderate-income population in an impacted area is established in the Federal Register by the U.S. Department of Housing and Urban Development.

Comment Received: The maximum allowed amount of $50,000.00 for the Homeowner Reimbursement Program is not high enough. ***(Multiple respondents provided this feedback)***

Staff Response: The GLO remains committed to ensuring all impacted Texans have access to resources that foster a meaningful recovery and this comment will be given thoughtful consideration moving forward.

Comment Received: SBA loans should not be considered a duplication of benefits as there is an obligation to pay that debt back. ***(Multiple respondents provided this feedback)***

Staff Response: All duplication of benefits rules and regulations are established under federal law and any changes to those rules are outside of the scope of the Texas General Land Office. Your concerns are, however, important and the GLO will continue to advocate for impacted Texans on issues like this one.

Comment Received: The GLO should increase funding for affordable housing initiatives and expand programs that support those initiatives: a. We urge the GLO to accomplish this partly by reallocating the $75 million from PREPs to the Affordable Rental Program; b. Additionally, we ask the GLO to make changes to its proposed programs to better the needs of homeowners and renters. These changes could include requirement to use funding to make relocation a viable option or allow multi-family landlords to recoup repair costs in the Homeowner Reimbursement Program.

Staff Response: The Texas General Land Office, in an attempt to meet the primary housing focus emphasized in the Federal Register and administer other necessary programs required for recovery efforts, has determined that the current proposed programs do that.

The GLO is committed to funding affordable housing initiatives and is working to refine the policies, processes, and procedures that support those programs. The feedback provided in this comment will be given thoughtful consideration as the programs resulting from this grant allocation progress.

Comment Received: The Action Plan falls short of Affirmatively Furthering Fair Housing.

Staff Response: The Texas General Land Office is fully committed to ensuring all CDBG-DR funds are administered to impacted communities in a manner that is consistent with federal law. As stated in the Action Plan, all programs and projects will be undergo an individual review for AFFH compliance. The GLO has gone further than required by federal law in coordinating a portion of these review efforts with an outside housing advocacy group to be as thorough as possible.

Beyond the AFFH requirements, the GLO is fully committed to administering programs that comply with Title VI of the Civil Rights Act of 1964. The GLO firmly believes that disaster recovery efforts should be undertaken in an equitable manner absent of discrimination of any kind.

Comment Received: The City of Houston and Harris County have had disproportionate access to the Proposed Action Plan which raises concerns about the GLO's transparency.

Staff Response: The Texas General Land Office has complied with all requirement presented under the Federal Register regarding the development of a robust citizen participation process. Not only has the public been given the 14-day requirement comment period, but the GLO extended that deadline.

The U.S. Department of Housing and Urban Development has determined, at its own discretion, that Harris County and the City of Houston are eligible to receive and directly administer funds under this allocation as such the GLO provided the Action Plan to Harris County and the City of Houston. Despite this, the GLO remains the primary agency for conducting oversight and monitoring of these programs and will work diligently with these entities to ensure compliance under federal law. Finally, the GLO is dedicated to the continual advocacy of all impacted Texans and is working tirelessly to ensure all communities, regardless of their size, are given an adequate chance to access funds to allow for an effective recovery within the U.S. Department of Housing and Urban Development program requirements and program implementation preferences

Comment Received: The GLO has no legitimate reason for not holding at least one public hearing on the Proposed Action Plan.

Staff Response: The Texas General Land Office and its staff has made every effort to conduct a robust citizen participation process in accordance with the Federal Register. In fact, this process began as soon as Hurricane Harvey made landfall when members of the GLO team conducted nearly 300 community visits and weekly conference calls with local officials to begin accessing the impact of the storm and the needs of disaster victims. The GLO has worked in constant tandem with local elected officials to gauge the needs of their constituency and those efforts have played directly into the formation of this Action Plan.

Comment Received: We commend and applaud the GLO for not seeking a waiver to lower the requirement that 70% of CDBG-DR funds be used to benefit LMI populations. The GLO cannot relinquish control of recovery funds to jurisdictions that do not recognize the importance of this requirement, especially Galveston County.

Staff Response: The Texas General Land Office has noted the feedback presented in this comment.

Comment Received: The Acton Plan does not appropriately account for other sources of funds.

Staff Response: The Texas General Land Office shall, in coordination with funding provided by other federal, state, local, private, and nonprofit sources, leverage CDBG-DR funds in a manner that allows for the most efficient recovery possible. This process would include identifying those funding sources and potentially using CDBG-DR funds to fill gaps and finish projects were other sources of funding were inadequate to do so.

Comment Received: The Needs Assessment undervalues unmet need among renters and LMI households.

Staff Response: The Texas General Land Office is committed to identifying and assessing the needs of all Texans impacted by Hurricane Harvey and recognizes that every method of evaluation and analysis presents certain shortcomings. Because of this, the GLO has dedicated resources to think beyond the means of evaluation and using resources like the Social Vulnerability Index to gain a more wholistic view of impact and recovery needs. The feedback in this comment shall be given thoughtful consideration as the disaster recovery process progresses.

Comment Received: The Action Plan does not tie its Needs Assessment to its funding allocation decisions.

Staff Response: The Texas General Land Office, through the analysis presented in the Action Plan, has provided all data up on which funding allocation decisions have been made outside of the direct allocations presented to Harris County and the City of Houston. The programs identified allow for the most efficient and effective recovery possible by allowing recovery to begin in several capacities from these very limited funds.

Comment Received: The GLO must allocate more money to the rehab and reconstruction of multi-family units with CDBG-DR funds as there were zero participants in the Multi-Family Lease and Repair Program funded by Section 408 of the Stafford Act.

Staff Response: The Multi-Family Lease and Repair Program was a FEMA funded program administered separate from any anticipation of CDBG-DR grant funds. The lack of participation in one program does not directly correlate with the decisions for funding distribution within this Action Plan.

Comment Received: The GLO should reallocate the $72.7 million for the PREPS match to the Affordable Rental Program and rely on the Rainy Day funds or existing funds to cover this expense. Additionally, the GLO should encourage local jurisdictions to focus on housing instead of covering cost shares for mitigation and public assistance that can be done with future allocations.

Staff Response: The PREPS program is a FEMA program administered separate from any anticipation of CDBG-DR funds within our state. Additionally, the State of Texas has worked to utilize funding in the interim period between Harvey landfall and CDBG-DR funding to ensure all Texans are given the most efficient route to recovery. The GLO does not have jurisdiction over any other State funds that could be used for this purpose.

Comment Received: It is a waste of time and an administrative burden to develop program guidelines by regional area.

Staff Response: The Texas General Land Office shall, on a high level, develop programmatic guidelines to ensure efficiency and uniformity in administration of CDBG-DR funds. However, the GLO is committed to coordinating with localities and regions to ensure that programs are allowed flexibility to be tailored to best serve the needs of those localities and regions.

Comment Received: The Homeowner Assistance Program does not adequately allow homeowners to relocate.

Staff Response: The Texas General Land Office recognizes that all programs proposed under this Action Plan must be carried out in a manner consistent with current federal law inclusive of adherence to the Uniform Relocation Assistance Act and all of its supporting provisions.

Comment Received: The Local Buyout and Acquisition Program is too vague to ensure equitable buyout administration.

Staff Response: The Texas General Land Office is committed to aiding communities in designing programs under the framework presented in this Action Plan. The GLO, as an oversight entity, shall work closely with communities to ensure that all programs created and carried out are done so in accordance with federal law. The GLO is dedicated to serving all impacted Texans to ensure an equitable recovery process.

Comment Received: There are concerns that the Homeowner Reimbursement Program does not serve LMI homeowners as they do not have the means necessary to render repairs in the first place. We encourage the GLO to open this program up for landlords who have made qualifying repairs on multi-family units.

Staff Response: The Texas General Land Office appreciated the feedback provided in this comment and will give it thoughtful consideration moving forward.

Comment Received: The Homelessness Prevention Program should be expanded to using any means necessary to prevent homelessness.

Staff Response: The GLO will consider every avenue available and allowable under CDBG-DR grant administration to provide for homelessness prevent. The feedback provided in this comment shall be given thoughtful consideration moving forward.

Comment Received: We have serious concerns that the Affordable Rental Program will be a less likely recovery alternative for many landlord as time passes.

Staff Response: The GLO recognizes how the typical timeline associated with the allocation of CDBG-DR funds can present unique obstacles to the recovery process. In light of this, the GLO is willing and open to utilizing the feedback presented in this comment to work to conquer those obstacles in a manner that fosters an effective recovery process.

Comment Received: The infrastructure spending references are too vague to ensure that funds will be spend to benefit the LMI community.

Staff Response: The U.S. Department of Housing and Urban Development has presented, in the Federal Register notice, the requirement that 70% of the aggregate amount of funding from this

CDBG-DR grant be utilized to benefit the low- or moderate-income population in the impact area. All programs, including infrastructure, are included in this calculation.

Comment Received: The economic revitalization program should be limited to no more than $25 million and available only to microenterprises given the GLO's recognition that the unmet housing need for the LMI population is $4.45 billion.

Staff Response: The Texas General Land Office appreciates the feedback provided in this comment and will give it thoughtful consideration as the Economic Revitalization Program specifics are developed.

Comment Received: The State needs to be more inclusive of nonprofits in identifying and participating in studies for executing projects developed during the planning process.

Staff Response: The Texas General Land Office is committing to utilizing expertise and knowledge from all sources to ensure Texans impacted by Hurricane Harvey are given the most wholistic recovery process possible. This commitment includes consultation with local citizens, governments, and relevant nonprofits.

Comment Received: The GLO has failed to set out a plan that ensures completion of projects in a timely manner, or to minimize opportunities for waste, mismanagement, fraud, and abuse.

Staff Response: The GLO must, in compliance with the requirements presented in the Federal Register, expend all obligated funds within two years of their obligation unless an extension is granted by the U.S. Department of Housing and Urban Development. Additionally, the GLO remains subject to regular audit proceedings to ensure all programs are implemented in a manner that minimizes the risk of waste, mismanagement, fraud, and abuse.

Comment Received: The GLO should present a centralized and searchable database to prevent wasting resources on answering duplicative public information requests.

Staff Response: The GLO has received the feedback presented in this comment and will give it thoughtful consideration as the recovery process continues.

Comment Received: The proposed Action Plan does not address vulnerable populations or shelters.

Staff Response: The GLO, through its programs to prevent and mitigate homelessness, shall look to address issues faced by vulnerable populations and in shelters. As these programs develop and progress, those details will be made available to the public to present the opportunity for collaborative problem solving.

Comment Received: The Action Plan fails to address the extent of displacement or the obstacles displaced residents face in returning to their communities.

Staff Response: The GLO has received the feedback in this comment and will give it thoughtful consideration moving forward.

Comment Received: The GLO should require standard benefit levels across jurisdictions to ensure housing assistance programs are offered across all parts of the disaster affected area.

Staff Response: The GLO is committed to ensuring that localities have the ability to develop programs in a manner that best serves their impacted population. This includes permitting jurisdictions to set certain programmatic guidelines. Despite this, the GLO shall maintain oversight of these programmatic details and ensure that all programs are designed in a manner that is consistent with federal law.

Comment Received: The LMI distribution should be changed from 70% of total funds to 50% of total funds.

Staff Response: The requirement that 70% of the aggregate amount of CDBG-DR funds be utilized to aid the low- or moderate-income population in an impacted area has been established in the Federal Register and the GLO is obliged to follow that guidance. Any changes to this guidance must be explicitly issued by the U.S. Department of Housing and Urban Development.

Comment Received: By the Texas General Land Office and NOT the City of Houston. We have not been treated fairly by current city and county administrators and this must change. We have confidence in the GLO and request that your office be in charge of the distribution of current and any future CDBG-DR funds related to Hurricane Harvey.

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston will receive a direct allocation of CDBG-DR funds under this Action Plan for Hurricane Harvey disaster recovery. The GLO shall, however, remain committed to ensuring that these funds are administered in a manner that remains in compliance with federal law through oversight and audit type functions. The GLO also remains committed to advocating for all impacted Texans as the recovery process continues.

Comment Received: In a 50/50 split between LMI households and non-LMI households as the flooding caused by Harvey did not maintain a 70/30 split in who it impacted.

Staff Response: The requirement that 70% of the aggregate amount of funding be utilized for the benefit of low- or moderate-income households is a regulation that has been established by the U.S. Department of Housing and Urban Development through the publication of the Federal Register. The GLO, in an effort to administer funds in accordance with the law, shall maintain this division unless otherwise directed from the U.S. Department of Housing and Urban Development. Any change in this requirement is the sole discretion of HUD, but the GLO recognizes this concern and will continue to advocate on behalf of impacted Texans.

Comment Received: Please do not limit the reimbursement program to $50,000 per household.

Staff Response: The designation of caps for programs have been determined during the initial design of each assistance program to ensure each program has necessary available funds to help as many impacted Texans as possible. The Texas General Land Office is committed to considering this feedback and will utilize this to reevaluate currently set caps in all programs. It should be noted, however, that the adjustments of any caps are at the sole discretion and determination of the program administrators.

Comment Received: There is a concern that the City of Houston is not capable of managing an amount of money in excess of $1 billion dollars. How can an organization the size of a city staff up appropriately and competently enough to efficiently and swiftly administer this size of a program?

Staff Response: The U.S. Department of Housing and Urban Development has determined that the City of Houston and Harris County are eligible to both directly receive funding under this Action Plan and administer those funds through varies recovery programs. Despite this, the Texas General Land Office shall maintain oversight and audit functions, offer technical assistance when necessary, and continue to advocate on behalf of all Texans impacted by Hurricane Harvey.

Comment Received: Grant an extension of the public comment period to total thirty days.

Staff Response: The Texas General Land Office has, as outlined in the requirements presented in the Federal Register, conducted a robust citizen participation process by publishing this Action Plan for public comment for the required period. Additionally, the GLO extended that period and accepted public comment up and until May 1, 2018 at 5:00 pm.

Comment Received: Galveston County formally objects to the direct allocations being given to the City of Houston and Harris County and requests that the State of Texas modify the Action Plan to include these two entities in an allocation process consistent with the other impacted communities across Texas. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Developed has deemed the City of Houston and Harris County as eligible to receive direct allocations of funding under this grant. The Texas General Land Office, however, shall maintain a certain level of oversight duties and work with each of these entities to ensure that all federal funding is administered in a manner consistent with federal law.

Comment Received: Galveston County requests the State seek a waiver to the 70% LMI overall benefit requirement and replace it with a 50% LMI overall benefit requirement. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has established the 70% low- or moderate-income overall benefit requirement through the publication of the Federal Register. All subrecipients, including the Texas General Land Office, are obliged to administer all grant money in accordance with current federal law. Otherwise, it should be noted that all requirements presented in the Federal Register are considered established law and may only be waived at the discretion of the U.S. Department of Housing and Urban Development.

Comment Received: Galveston County requests the State seek a waiver to the LMI area benefit requirement. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has established the low- or moderate-income area benefit requirement through the publication of the Federal Register notice. All subrecipients, including the Texas General Land Office, are obliged to administer all grant money in accordance with current federal law. Otherwise, it should be noted that all requirements presented in the Federal Register are considered established law and may only be waived at the discretion of the U.S. Department of Housing and Urban Development.

Comment Received: Galveston County requests the State revise the Action Plan to clearly indicate which types of studies will be conducted by vendors and which will be intended for research institutions. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office has determined that the usage of research institutions within the state to conduct planning studies related to Hurricane Harvey recovery would be the most effective and efficient.

Comment Received: The City requests to be allowed to retain and utilize program income to allow the City to quickly cycle funding back into the community.

Staff Response: The GLO will consider on a case by case basis allowing Subrecipients to maintain program income.

Comment Received: The City requests the GLO allow flexibility in the caps set for administrative and project delivery costs.

Staff Response: The Texas General Land Office has, in utilizing its experience with CDBG-DR grant fund administration, set certain cost caps associated with administrative and project delivery activities. These caps have been determined as reasonable and will only be adjusted if, at the sole discretion of the GLO, it is determined that such an adjustment is warranted and necessary.

Comment Received: The City requests the following waivers: Provide a scalable affordability requirement to improve the feasibility to fund both large and small scale projects.

Staff Response: The Texas General Land Office recognizes the reasoning behind this comment and will take this feedback into consideration as programs progress.

Comment Received: The City requests the following waivers: Extend the timeframe each grantee has to expend all obligated funds from two years to six years.

Staff Response: All expenditure deadlines have been established by the Department of Housing and Urban Development and the GLO shall only seek waivers of these deadlines if and when it can be shown that such an extension is warranted and necessary.

Comment Received: The current program implementation of small business grants does not align with historical legislative efforts as it does not target 'Mom and Pop' business. a. The following are recommendations related to this point: i. Grant amounts should be capped at $100k to support assistance being provided to a greater number of applicants; ii. No applicant should receive total funds in excess of the $100k cap, inclusive of any other compensation for loss received from any other governmental agency, and iii. Work retention or new hires under this program should target areas hardest hit by Harvey.

Staff Response: The Texas General Land Office is committed to developing recovery programs that are both efficient in practice and effective in outcome. The feedback provided in this comment will be taken into consideration as the policies and procedures related to the pilot Small Business Loan Grant Program are developed.

Comment Received: I applaud and support the direct allocation of the Houston and Harris County disaster recovery planning process. The GLO should work closely with The City of Houston and Harris County to ensure a seamless process. The following are recommendations related to this point: i. The focus on the most vulnerable areas for recovery is important and for this reason the level of scrutiny should include zip codes and carrier routes to better understand poverty within counties. ii. The GLO should include an assessment of persons who are at risk of homelessness. iii. The goal should be to sustain, not degrade, the number of multifamily LMI housing options. iv. Native American communities should be engaged in the housing recovery process.

Staff Response: The U.S. Department of Housing and Urban Development has deemed Harris County and the City of Houston eligible to be direct recipients of grant money allocated in association with this Action Plan. The Texas General Land Office shall, however, build and maintain a close working relationship with both of these entities to ensure all grant funding is administered in a manner that is consistent with federal law.

The GLO shall record all aspects of this comment and present them for consideration by the Harris County and The City of Houston as these entities remain a higher level of autonomy when designing their recovery programs.

Comment Received: Multi-Family Lease and Repair needs refining. a. The following are recommendations related to this point: i. The affordability period is too short given the length of time recovery is expected to take. ii. Residents in the 500 or 1000 year floodplains should be consulted with to ensure resilience and sustainable designs are a part of the repairs provided. iii. A census of neighborhoods should be conducted to determine scope and severity of damage. iv. A construction training program should be established in coordination with local programs and schools to fuel the workforce need. v. Focus efforts for new hires for construction jobs on those residing in the hardest hit areas.

Staff Response: The Multi-Family Lease and Repair Program, a FEMA funded program administered by the GLO is not a part of this Draft Action Plan.

Comment Received: Oversight of home repairs as it relates to the PREPs Program. a. The following are recommendations related to this point: i. The GLO should establish an audit process whereby audits of the work performed under these programs can be performed and assessed. ii. The State should establish an ombudsman and a complaint line for consumers to report problems and provide an effective means to have legitimate complaints addressed.

Staff Response: The PREPs Program, a FEMA funded program administered by the GLO is not a part of this Draft Action Plan.

Comment Received: The GLO should collaborate with local jurisdictions to include a census of homeless persons in the impacted areas.

Staff Response: The Texas General Land Office has, through the outlining of programs in the Action Plan, set aside a portion of grant funds specifically to address prevention of homelessness within the impacted area. It is the full intention of the GLO to collaborate with local communities to identify the specific needs of each population and work to create programs that foster the greatest ability to meet those needs.

Comment Received: The GLO should commit to hiring locally in the hardest hit areas.
Staff Response: The Texas General Land Office recognizes the value of hiring locally in the areas hardest hit by Hurricane Harvey and will consider instituting policies and practices that prioritize this practice.

Comment Received: How can City of Houston staff manage a grant this large? The Mayor has already diverted funds from my zip code and we don't want this type of bias associated with these grant funds.

Staff Response: The U.S. Department of Housing and Urban Development has deemed the City of Houston eligible to receive a direct allocation of these grant funds to be administered for disaster recovery purposes. The Texas General Land Office shall remain available to all grantees to offer technical assistance to ensure all funding is administered in accordance with federal law.

Comment Received: The Homeowner Reimbursement Program should not cap funds at $50k per household. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office has worked to establish program caps that permit the grant funds allocated in associated with this Action Plan to reach as many impacted Texans as possible. It is the ongoing goal of the GLO to design programs, policies, and processes that have the most widespread impact as the recovery process progresses.

Comment Received: Extend the comment period beyond April 25, 2018. ***(Multiple respondents provided this feedback)***

Staff Response: The Texas General Land Office has, in compliance with the citizen participation requirements presented in the Federal Register, has conducted the mandatory fourteen-day public comment period. Additionally, the GLO extended this comment period up and until May 1, 2018 at 5:00 pm.

Comment Received: Request a waiver from HUD or by State Administrative Plan, if sufficient authority exists, to seek a reduction in the 70% overall benefit requirement. ***(Multiple respondents provided this feedback)***

Staff Response: The U.S. Department of Housing and Urban Development has established, through the publication of the Federal Register, that 70% of the aggregate amount of CDBG-DR funding associated with this Action Plan must be utilized for the benefit of low- or moderate-income households. Absent compelling evidence that this requirement presents a serious impediment to the disaster recovery process, it is the decision of the GLO not to seek such a waiver at this time. It should be noted that all waiver decisions are solely within the discretion of the U.S. Department of Housing and Urban Development.

Comment Received: The Texas Department of Insurance would like to present the following: 1. As future submissions of Hurricane Harvey data are reviewed and finalized, these reports will be published via www.TDI.Texas.gov under the Reports and Publications section. 2. TDI also provides a residential property statistical plan that may also be found via our website. 3. TDI has provided the GLO with the Quarterly Residential Property Policy and Exposure report.

Staff Response: The Texas General Land Office has received all relevant information and documentation associated with this comment and will give it ample consideration as the disaster recovery process progresses.

Comment Received: Needs Assessment. It appears to me that the needs assessment presented has been conducted without actually visiting the impacted areas and visiting with citizens.

Staff Response: The Texas General Land Office has, and continues, to meet with impacted communities to assess their specific needs. The GLO began weekly conference calls along with in person meetings as soon as Harvey made landfall and has remained in constant contact with local officials to adequate assess need and determine the programs needed to foster an effective recovery for each specific community. To date GLO staff have participated in in excess of 300 meetings, hearings, and discussions related to response and recovery for Hurricane Harvey.

Comment Received: The median value of impacted homes is listed at $105,800, but this requires more money to be allotted to homes that require less money to be repaired. Why is needs not based on the difference between income and home value?

Staff Response: This value was set to be representative of an average home cost to calculate damage and unmet need. The actual need and cost of a repair per home will determine the cost spent per home.

Comment Received: The previous system used to determine need after Hurricane Harvey is flawed in that it doesn't account for the discrepancy between insurance monies and the actual cost to fix a home, it doesn't account for the discrepancy between income and home valuation, and does not account for the lack of construction workers and the high cost of basic supplies.

Staff Response: The Texas General Land Office utilizes up-to-date data and long-standing methodology to determine unmet need within disaster impacted communities. This value was set to be representative of an average home cost to calculate damage and unmet need. The actual need and cost of a repair per home will determine the cost spent per home.

Comment Received: It is with a heavy heart that I am pleading that this grant be administered by the Texas General Land Office and not City of Houston. I urge you to please look at cases for assistance individually and not make a general analysis as there are residents in the 77079 zip code who are struggling. I have lost faith in the City of Houston. ***(Multiple respondents provided this feedback)***

Staff response: The U.S. Department of Housing and Urban Development has deemed the City of Houston eligible to directly receive and administer grant funds under this Action Plan. The Texas General Land Office, as an oversight entity, is obliged to ensure that all funds are administered in the manner laid out by federal law. Despite this, the GLO remains committed to advocating for all impacted Texans. The feedback provided in this comment is valuable and our agency will give this ample consideration as we continue our advocacy efforts.

Comment Received: Please ensure that grant funds are available to all impacted citizens, regardless of income or whether or not they had flood insurance.

Staff Response: Eligibility criteria, including income levels and flood insurance status, are all determined at the federal level by the U.S. Department of Housing and Urban Development. The Texas General Land Office, as the primary administrator of CDBG-DR grant funds, is obliged to ensure that all grant funds are utilized in a manner consistent and in compliance with current federal law. Despite this, the GLO remains an advocate for impacted Texans and will utilized every available option to ensure as many citizens are given access to recovery resources as possible.

Comment Received: Redefined 'Future Award Related to Harvey' to exclude any future legal award that results from pending suits.

Staff Response: All rules and regulations relating to duplication of benefits are federally established and the GLO, as the primary administrator of CDBG-DR funds, is obliged to follow those rules unless otherwise indicated by the U.S. Department of Housing and Urban Development.

Comment Received: We had a lot of damage in Bayside ,Texas which is in Refugio County, from hurricane Harvey.

Staff Response: The Texas General Land Office is dedicated to working with disaster impacted communities to assess their recovery needs. The GLO recognizes the needs presented in Refugio County and will utilize this feedback as recovery programs and processes develop.

Comment Received: We have been carefully reviewing the Action Plan presented for Public Comment and overall, we feel that developing a state run method of distribution if fair and justifiable. We would like to emphasize that the Coastal Bend Council of Governments is experienced in grant administration, but would need funds for addition staff to administer a grant of this magnitude. Because of the scale of Hurricane Harvey's impact and the relatively small populations of communities within our County, we will need much assistance in both the dissemination of information and in aiding citizens with grant applications.

Staff Response: The Texas General Land Office is prepared to offer technical assistance at all levels to ensure local communities have the tools and people they need to successfully implement disaster recovery programs.

Comment Received: Hurricane Harvey also had a major negative impact on the LMI apartment housing in the area which has translated into impacts on the economy as families have been forced to relocate to find housing.

Staff Response: The Texas General Land Office recognizes the need for the rebuilding of multi-family housing for both the low- or moderate-income and non-low- or moderate-income population in impact areas and if working to specifically develop programs for each area. It is the goal of the GLO to ensure impacted Texans are able to remain within their communities and/or return to their communities as the recovery process progresses.

Comment Received: Information from the Texas Education Agency should be considered during the needs assessment. Of the six school districts within the county, only one of them has a percentage of economically disadvantaged students that is less than the state average. The families of these students have been hit the hardest financially by the storm.

Staff Response: The information presented in these statistics is valuable and will be given thoughtful consideration as recovery programs, policies, and procedures are designed and implemented.

Comment Received: Our county also has an aging infrastructure system that would greatly benefit from CDBG-DR funds. Our region lacks readily available engineering services and will have to contract out for these services. This unique need should be considered during the formulation of the Method of Distribution for this region.

Staff Response: Infrastructure projects impacted by Hurricane Harvey are likely eligible activities under CDBG-DR grants and the Texas General Land Office will work with local officials to ensure that the most effective recovery projects are selected and implemented in accordance with the law. The GLO recognizes the specific concern addressed in this comment and will consider the lack of engineering services in the formation program designs.

Comment Received: Wharton County respectfully requests the Texas General Land Office modify the State Action Plan to clearly indicate which types of planning studies will be conducted by vendors and which will be conducted by research institutions. Wharton County believes that allowing vendors with experience with projects within the community would ensure a timely, robust, and lasting recovery.

Staff Response: The Texas General Land Office has determined it would be beneficial to leverage the knowledge, expertise, and resources available through state universities and vendors to conduct planning studies for the benefit of disaster impact communities. Although these research institutions will be spearheading these efforts, they will work closely to coordinate with all local resources to ensure studies are conducted in the most efficient and effect manner possible.

Comment Received: The 70/30 rule should be lowered to include more of the areas that flooded within Galveston County. As it stands, Galveston County had more homes sustain more damage than Harris County and will see little benefit from the grant funding in terms of infrastructure projects.

Staff Response: The U.S. Department of Housing and Urban Development has mandated, through the publication of the Federal Register, that 70% of the aggregate amount of funding under this grant be utilized in a manner that provides a benefit to low- or moderate-income households in the impact area. The GLO will continue to advocate for the needs of all impacted Texans as the disaster recovery process continues. It should be noted, however, that the U.S. Department of Housing and Urban Development maintains sole discretion in granting or denying these waivers.

Comment Received: Several Galveston County Mayors along with Galveston County Commissioners Court are asking the state to pursue a waiver to the federal requirement that 70% of CDBG-DR funds be used to benefit LMI households in the impacted area. If this waiver is pursued and granted, citizens living in unincorporated areas will not be allocated the resources necessary to recover. This rule should remain unchanged and the state should keep control of the funds.

Staff Response: The U.S. Department of Housing and Urban Development has mandated, through the publication of the Federal Register, that 70% of the aggregate amount of funds allocated under this grant be utilized in a manner that directly benefits low- or moderate-income households. The GLO, as the primary administrator of these funds, is obliged to administer programs in a manner consistent with current federal law. As of the date this response was drafted, the GLO is not actively

pursuing a waiver to this requirement absent the presentation of compelling evidence that suggests a change to this rule is necessary to produce an effective recovery.

Comment Received: Should Kemah look to build a new water treatment plant in advance of the next hurricane as the current plant is not adequate for the tourism brought to the area every year?

Staff Response: The Texas General Land Office remains committed to identifying and analyzing all proposed disaster recovery projects. The information provided in this comment will be given thoughtful consideration as the recovery process progresses.

Comment Received: Please do not limit who can get financial help from Harvey funds. We own our home and have a rental home that flooded and was a total loss. Our rental home is not eligible for funds because it was ' a rental'. Well, somebody in our community was living there and they are now out of a home. We should not be ignored or refused because we have worked hard not to have to ask for help or be dependent on others our entire lives.

Staff Response: The GLO remains committed to ensuring all CDBG-DR funds are allocated in a manner that is consistent with federal law. The GLO shall remain an advocate for impacted citizens like yourself as the recovery process progresses.

Comment Received: The Action Plan must prioritize Low- and Moderate-Income Communities to ensure an equitable recovery.

Staff Response: The GLO shall administer all CDBG-DR recovery funds in compliance with current federal law, including the 70% overall low- or moderate-income benefit requirement established in the Federal Register.

Comment Received: HOME believes the GLO should follow the principles listed below in meeting the housing needs of Texas residents: a. Recovery funds should be spent on housing and not infrastructure; b. We believe that the 70% overall benefit requirement is too low; c. The money should prioritize Black, Brown, and low-income Asian Pacific Islander neighborhoods which need more investment to make up for historic underinvestment; d. Money should be set aside by income levels according to who sustained damage (regardless of whether or not the qualified for FEMA assistance).

Staff Response: The GLO shall, as stated above, ensures that the administration of all CDBG-DR funds is in compliance with all currently applicable federal law. The GLO remains committed to working with all impacted communities to ensure the needs of their citizens are adequately addressed.

Comment Received: Buyouts should be executed in an equitable manner. This includes compensation for buyouts that would provide homeowners with the amount needed to buy another house with the same level of indebtedness in a neighborhood of opportunity.

Staff Response: Per federal guidelines, compensation for Buyouts may include the pre-disaster fair market value. Outside of this requirement, the GLO is open to considering the feedback presented in this comment to foster a more equitable execution of buyout programs.

Comment Received: Money should be allocated for renters who were denied FEMA assistance.

Staff Response: The GLO has received the feedback presented in this comment and will give it thoughtful consideration as programs progress.

Comment Received: PREPS work was subpar and should not reduce the overall amount of CDBG-DR assistance an applicant is able to receive.

Staff Response: The PREPS Program, a FEMA program administered by the GLO, was designed as a 'shelter in your home' program to allow impact citizens the ability to remain in their homes while the rebuilding process continued. It is the intention of the GLO to leverage work done under this program with CDBG-DR funds to expedite the rebuilding process for eligible applicants.

Comment Received: The GLO should prioritize community engagement.

Staff Response: The GLO shall, in compliance with the Federal Register notice, conduct a robust public participation process at all levels of CDBG-DR grant administration in order to ensure disaster recovery programs are specifically tailored to the needs of each community.

Comment Received: Recovery monies in the Action Plan should create a platform which can create good safe jobs that benefit local workers.

Staff Response: The GLO has received this feedback and will give it adequate and thoughtful consideration as the recovery process continues.

Comment Received: The State should ensure all work crews have OSHA-10 training and proper PPE.

Staff Response: The GLO is committed to ensuring all rehabilitation and construction work conducted as a part of CDBG-DR programs is done in compliance with all federal wage and safety laws.

Comment Received: All contractors should be screened for prior wage and/or labor law violations before being utilized by CDBG-DR grant funded programs.

Staff Response: As required by federal law, all potential contractors must undergo a vetting process to check for prior violations of wage and labor law before being permitted to contract for work funded by CDBG-DR grants.

Comment Received: Recovery dollars should be leveraged towards training and career development by requiring contractors to participate in DOL apprenticeship programs.

Staff Response: The GLO intends to utilize every aspect of the disaster recovery process to benefit impacted communities and the feedback provided in this comment will be given thoughtful consideration moving forward.

Comment Received: The GLO should hire independent monitors to ensure Department of Labor law compliance.

Staff Response: The GLO shall conduct or cause to conduct all monitoring procedures related to state administered CDBG-DR grant funds. These monitoring duties include compliance checks for U.S. Department of Labor laws throughout the recovery process.

Comment Received: Any repairs or reconstruction should meet modern water and energy efficiency standards to build for a more sustainable future.

Staff Response: As presented in the Federal Register, water and energy efficiency standards for reconstruction projects must be met when using CDBG-DR grant funds. The GLO is committed to ensuring these standards are implemented in compliance with federal law.

Comment Received: I would like to know how organizations can utilize this grant? More specifically, what is the process for applying for funding or who is responsible for disbursing the funds?

Staff Response: The Texas General Land Office shall be the primary administrator of CDBG-DR grant funds for any regional outside of Harris County and the City of Houston. As recovery programs progress, the GLO shall make program eligibility and application processes known to all impacted citizens through a robust citizen participation process.

Comment Received: The City of Bellaire, Texas hereby requests that the State of Texas pursue maximum flexibility in the use of HUD CDBG-DR funds by requesting a waiver to seek a reduction in the 70% overall LMI benefit rule.

Staff Response: The U.S. Department of Housing and Urban Development has, through the publication of the Federal Register, established the requirement that 70% of the aggregate amount of CDBG-DR funds associated with this Action Plan must be utilized in a manner that benefits the low- or moderate-income population in the impacted area. The Texas General Land Office, along with any other subrecipient of CDBG-DR funds, is obliged to administer these funds in consistent with all standing federal law.

Comment Received: I would like to strongly encourage housing projects developed as a part of the Affordable Rental Program outlined in the Action Plan be done in line with an initiative known as Equitable Transit-Oriented Development (eTOD).

Staff Response: The Texas General Land Office remains committed to evaluating and analyzing innovative initiatives, like eTOD, as programs are developed under the Action Plan. The feedback provided in this comment is valuable and will be given thoughtful consideration as the disaster recovery process progresses.

Comment Received: The GLO's reliance on the methodology used by HUD in Appendix A prevents it from including an accurate estimate of unmet need in the Proposed Action Plan.

Staff Response: The Texas General Land Office has utilized the most up-to-date data in the analysis presented in this draft Action Plan. The GLO remains committed to looking for innovative ways to make the assessment of needs process more accurate and will consider the feedback provided in this comment.

Comment Received: We strongly urge the GLO to consult with the Governor's Office to use the Economic Stabilization Fund instead of CDBG-DR funds to pay the local cost shares for FEMA Hazard Mitigation Grants.

Staff Response: The Texas General Land Office remains in constant contact to coordinate disaster recovery efforts associated with this allocation. However, the use of the Economic Stabilization Fund is entirety within the discretion of the Office of the Governor.

Comment Received: The GLO already fails to meet the requirement to use 70% of the CDBG-DR funding for LMI populations.

Staff Response: The Texas General Land Office is committed to meeting the requirement that 70% of the aggregate amount of funds provided under this allocation be utilized in a manner that benefits the low- or moderate-income population within the impacted area. The GLO shall continually monitor programs and projects as they develop to ensure this national objective is met.

Comment Received: The GLO must ask HUD for additional time before submitting the Proposed Action Plan as the current timeline is insufficient to allow the GLO to respond to comments and, more importantly, incorporate the comments into the proposed Action Plan.

Staff Response: The Federal Register notice requires the Action Plan be submitted within 90 days of February 9, 2018 which will not allow for any further extensions of the Action Plan public comment period.

Comment Received: The GLO has refused requests to grant reasonable access to data the agency relied on to produce the draft Action Plan.

Staff Response: The Texas General Land Office has been responsive to all requests for data utilized in this draft Action Plan to the extent allowable under current law.

Comment Received: The methodology for determining unmet needs underestimate those for LMI households, and especially for extremely low income households. We recommend the following actions: a. The GLO should use the methodology proposed so that it appropriately prioritizes the needs of LMI households and proportionally funds regions as required; b. The GLO should re-allocate Local Infrastructure Program funding and Economic Revitalization funding in order to cover the additional LMI unmet needs that exist as revealed through the proposed methodology.

Staff Response: The Texas General Land Office has utilized the most up-to-date data in analyzing the unmet need for low- or moderate-income households as presented in the draft Action Plan. However, the GLO remains open to exploring innovative ways of accurately assessing disaster impact and will consider the feedback provided in this comment.

Comment Received: The draft Action Plan fails to adequately provide for affordable housing, which will result in the failure to appropriately serve renter households and increase the existing severe affordable shortage. We recommend the following actions: a. The GLO should make explicit in its Action Plan clear rental affordability targets for each subrecipient for the Affordable Rental Program; b. The GLO should create an outreach plan for making affordable rental housing funded under CDBG-DR primarily available to LMI disaster victims who were

renters before the disaster; c. The GLO should impose agreements on rental housing providers that will maximize the long-term affordability of rental housing units to ensure a minimum of 40-years of affordability and the mandator acceptance of Housing Choice Vouchers.

Staff Response: The Texas General Land Office has worked diligently to construct a series of recovery programs that provide the most need for the greatest amount of people within the impact area. The GLO remains open, however, to tailoring these programs in a manner that best suites the needs of each individual community and will give this feedback thoughtful consideration as the recovery process progresses.

Comment Received: The Action Plan provides no funding or programs to assist households with clearing title, property tax, or other issues the prevent households from accessing assistance from the programs described in the draft Action Plan. We recommend the following: a. The GLO should re-allocate Economic Development and/or Local Infrastructure Program funding for the purposes of funding a program that assists LMI disaster victims in overcoming title, property tax. And other issues that are a barrier to accessing the benefits of disaster recovery programs.

Staff Response: The Texas General Land Office remains dedicated to developing efficient and effective recovery programs that foster an effective and efficient recovery process. The GLO appreciates comments that work to address specific issues that may arise as a program is implemented and will take the feedback provided in this comment and adequately consider it as programs develop.

Comment Received: The draft Action Plan fails to provide an option for CDBG-DR eligible households to choose to move out of high-risk and/or racially-concentrated areas of poverty. We recommend the GLO include funding for the Homeowner Opportunity Program.

Staff Response: The Texas General Land Office maintains its stance that the currently presented programs are necessary for disaster recovery and will remain the primary focus of this Action Plan allocation. The Draft Action Plan offers a buyout and acquisition program that will allow homeowners to relocate.

Comment Received: The Action Plan lacks details and clarity that are needed in the duplication of benefits review. We recommend the following: a. The GLO put in place a clear policy that established Duplication of Benefits protocol for PREPS homes to ensure these homeowners are not unjustly barred from received funds under this allocation; b. The GLO should work with HUD and FEMA to establish DHAP and make it immediately available to disaster survivors.

Staff Response: All duplication of benefit reviews will be governed by federal duplication of benefits law. The GLO shall conduct all reviews in accordance with the current federal law.

Comment Received: The draft Action Plan excessively and unjustifiably applies the resiliency multiplier to recovery activities, which is inappropriate for CDBG-DR funds. We recommend a review of resiliency multiplier protocol.

Staff Response: The Texas General Land Office shall take the feedback in this comment and consider a review of the resiliency multiplier protocol as suggested.

Comment Received: There is no meaningful analysis of LMI by any geographic measure that justifies allocations among the City of Houston, Harris County, and COG regions.

Staff Response: The U.S. Department of Housing and Urban Development has deemed the City of Houston and Harris County as eligible to direct receive and administer CDBG-DR funds under this allocation. The GLO, however, shall maintain oversight duties of these funds and is committed to ensuring all CDBG-DR funds are administered in a manner that is consistent with federal law.

Comment Received: The methodology described on pages 117-127 is overly complicated, nearly unintelligible to the public, does not provide a clear methodological process that the local government can reasonably be expected to interpret and follow, and fails to adequately explain how it is being applied to the administration of CDBG-DR governed by this draft Action Plan.

Staff Response: The Texas General Land Office has utilized the most up-to-date data to form a logical chain of analysis that presents a basis for funding decisions within the Action Plan. The GLO recognizes the complexity of administering federal funds and shall remain a constant source of technical assistance for local governments as they navigate the disaster recovery process.

Comment Received: The five "Interim Housing Programs" are listed, but there is no analysis of any of these programs and excessive funding appears to be allocated to the PREPS program.

Staff Response: The five forms of Temporary Direct Housing Assistance are separate from this CDBG-DR allocation in that they are FEMA funded programs administered by the GLO. Although the GLO has proposed using some of the CDBG-DR funds as a 'match' for PREPS program implementation, that is considered an allowable use of CDBG-DR funds and no further analysis of any other programs is necessary.

Comment Received: The Action Plan fails to establish a method by which it will monitor how its recovery Affirmatively Furthers Fair Housing.

Staff Response: The Texas General Land Office is committed to administering all CDBG-DR funds in a manner that is consistent with federal law, including the AFFH rule. As stated in the Action Plan, the GLO is partnering with an advocacy group to conduct an AFFH compliance review for each program and project conducted under this allocation. The compilation of these reviews will serve as a comprehensive way in which the GLO will be able to monitor how the overall recovery process is adhering to AFFH guidelines.

Comment Received: The infrastructure project guidelines lack needed specificity.

Staff Response: The GLO shall, as the infrastructure program develops, refined guidelines to a certain level of specificity as they pertain to individual communities and projects. The GLO is committed to coordinating with impacted localities to ensure these guidelines foster an effective and efficient disaster recovery process.

Comment Received: There is no specific mention of mold remediation under the Protection of People and Property on page 67. We recommend mold inspections and remediation be performed on all homes and that clear guidelines are established to govern this.

Staff Response: The feedback presented in this comment has been received and the GLO will give it adequate consideration as the recovery process progresses.

Comment Received: The draft Action Plan defers too many programmatic discretion to local governments which poses administrative and compliance challenges. We recommend that the GLO prescribe both the needs assessment and housing guidelines using the FEMA data to which the GLO has unique access.

Staff Response: The GLO is committed to administering CDBG-DR funds in a manner that is both consistent with federal law and tailored to the specific needs of each impacted community due to the varying impacts across the vast impact area. In order to achieve these goals, the GLO has determined that a certain level of programmatic discretion, while still subject to GLO oversight, must be allowed in order for local governments to truly address the needs of their community.

Comment Received: The draft Action Plan does not provide enough guidance in its proposed Buyout Program. We recommend specific guidelines for all buyout program participants to follow. We also recommend the use of housing incentives that allow LMI homeowners a more viable opportunity to purchase a replacement home outside of high risk and inside higher opportunity areas.

Staff Response: The GLO is dedicated to forming programs and guidelines that provide the most effective and efficient recovery process possible. This will include the development of more specific guidelines as they pertain to a Buyout Program, all of which will be done in close coordination with impact communities through a public process.

Comment Received: The Homeowner Reimbursement Program lacks sufficient guidelines for how the GLO will administer the program in a way that prioritizes LMI households. We recommend the GLO establish guidelines and criteria that ensure the Homeowner Reimbursement Program primarily benefits LMI households.

Staff Response: The GLO is dedicated to forming programs and guidelines that provide the most effective and efficient recovery process possible. This will include the development of more specific guidelines as they pertain to the Homeowner Reimbursement Program, all of which will be done in close coordination with impact communities through a public process.

Comment Received: The Affordable Rental Program fails to target housing for very and extremely low income households. We recommend the GLO provide targets for each subrecipient for unmet rental housing need and establish criteria and other guidelines that promote developments which substantially contribute towards meeting those affordability targets.

Staff Response: The feedback provided in this comment will be given thoughtful consideration as the disaster recovery process progresses.

Comment Received: The Local Infrastructure Program proposes to provide inadequate data for assessing needs an ensuring AFFH compliance. We recommend the GLO provide data at a smaller geography to subrecipients to allow for adequate demographic analysis.

Staff Response: The GLO has developed all strategies presented in the Action Plan by utilizing the most up-to-date data on the most granulated level allowable under current law.

Comment Received: The proposed public website provides insufficient information to the public.

Staff Response: The Texas General Land Office is committed to fulfilling its duties for a robust public participation process by maintaining a public facing website that contains all documents specifically required by the Federal Register. This is an ongoing process and the GLO is dedicated to ensuring all relevant documents are posted to our website in a timely fashion.

Comment Received: We would like to recommend incorporating 1. FEMA's P-804, Wind Retrofit Guide for Residential Buildings as a method to address hazard mitigation and tie local mitigation efforts directly to federal funding and 2. A FEMA job aid establishes the use of pre-determined benefits to demonstrate the cost-effectiveness of wind retrofit projects that comply with FEMA P-804, thus eliminating the requirement for applicants to conduct a separate benefit-cost analysis for a hurricane wind retrofit project that meets the criteria identified.

Staff Response: The Texas General Land Office remains committed to administering CDBG-DR funds in a manner that both helps impacted community's recovery and aids in their ability to rebuild in resilience. The information presented in this comment is valuable and the GLO will give it thoughtful consideration as the recovery process develops.

Comment Received: USCBG would like to recommend the following as they relate to the Action Plan: 1. Leadership in Energy and Environmental Design should be included among options for green building certification in the final action plan, providing choice to the market and to project teams; 2. USGBC supports ENERGY STAR as included in the draft action plan among permitted construction standards for reconstruction and new construction, alongside LEED as an additional certification option for projects.

Staff Response: The Texas General Land Office remains committed to helping impacted communities rebuild in a manner that fosters sustainable and resilient communities. The feedback provided in this comment contributes to that objective and the GLO will give the information contained herein adequate consideration as the recovery process develops.

Comment Received: I would like to present the following public comments: 1. The GLO should seek a reduction in the 70% overall LMI benefit requirement; 2. The GLO should seek a reduction or removal of the LMI requirement for infrastructure projects; 3. The Action Plan should be amended to allow certain local jurisdictions (based on size) to form and manage their own programs associated with the Action Plan.

Staff Response: The U.S. Department of Housing and Urban Development has, through the publication of the Federal Register, established the 70% low- or moderate-income overall benefit rule and the low- or moderate-income requirement for infrastructure projects. The Texas General Land Office is obliged to administer all CDBG-DR funds in a manner that is consistent with existing federal law.

The GLO has determined that leveraging previous experience with grant administration with local expertise would be the most effective and efficient way to administer CDBG-DR funds to impacted

communities. The City of Houston and Harris County have been determined eligible for a direct allocation of CDBG-DR funds by the U.S. Department of Housing and Urban Development and all other impacted areas will complete programs ran and overseen at the state level.

Comment Received: I would like to present the following comments: 1. I am concerned with the disproportionately low amount of funding provided under this Action Plan for Homelessness Prevention. 2. The GLO should designate Continuums of Care as a regional partner in recovery planning.

Staff Response: The Texas General Land Office remains committed to ensuring all impacted Texans are given adequate resources to recovery from the impacts of Hurricane Harvey in the most effective and efficient manner possible. The GLO shall continue to advocate for all Texans and will continue to seek innovative ways to leverage the expertise and knowledge of organizations like Continuums of Care throughout the disaster recovery process. The feedback provided in this comment will be given adequate consideration as programs develop under this Action Plan.

Comment Received: The Unmet Needs of LMI Texans are Not Accurately Determined by HUD and GLO Methodology.

Staff Response: The Texas General Land Office, in its formation of the Action Plan associated with this allocation, has utilized the most recent available data for analysis. The GLO remains committed to supporting housing as the most urgent and critical recovery need and will continue to prioritize safe, resilient, and affordable housing for disaster survivors.

Comment Received: Use of Funds, a. Homeowner Assistance Program: We applaud the State's commitment to proportional funding for various income categories. The State should include a homeowner mobility program like the post Ike/Dolly Homeowner Opportunity Program (HOP), which allows for eligible homeowners to choose to move to a lower-risk higher opportunity area rather than rebuild in place. Including this program would increase resiliency and mitigate the impact of future disasters by allowing homeowners to move to sage and less disaster-vulnerable areas. The Action Plan should also include mobility counseling and legal assistance for to ensure a more equitable mobility program. These services would help homeowners present a clear title to their homes and/or present alternative proofs of ownership.

Staff response: The GLO is committed to ensuring the effective and efficient administration of a Homeowner Assistance Programs. Feedback like that provided in this comment will be given adequate consideration moving forward as the GLO seeks to leverage as many resources as possible to make programs under this grant successful.

Comment Received: Local Buyout and Acquisition Program, Program guidelines for this program must be developed in a transparent process with extensive community input. Without planning and community buy-in, a voluntary individual buyout program can result in a patchwork of empty and occupied homes, creating blight in neighborhoods. Local buyout and acquisition programs must prioritize LMI households in floodways and be constructed in a manner that provides enough funds that the choice to move is a realistic one. In particular, using the pre-storm value of a home to determine program benefits often has a discriminatory impact on LMI households.

Staff Response: The GLO is committed to conducting a robust citizen participation process at every stage of disaster recovery program implementation. The GLO recognizes the unique issues that could arise from a buyout and/or acquisition program that is not conducted with extensive community input and will work with program administrators on all levels to achieve the highest level of coordination possible.

Comment Received: Homeowner Reimbursement Program, as a direct housing program, the reimbursement program must set aside proportional funding to serve each income category.

Staff Response: The feedback presented in this comment has been received and the GLO will give it thoughtful consideration as the Homeowner Reimbursement Program develops.

Comment Received: Homelessness Prevention Program, the Homelessness Prevention Program does not allocate enough funds, potentially leaves out families displaced to Bexar, Dallas, Tarrant, and Travis Counties, and does not include help for households that are currently homeless as a result of the hurricane.

Staff Response: The Texas General Land Office is committed to adequately addressing and assessing the needs of all impacted Texans. The feedback provided regarding the Homelessness Prevention Program is valuable and will be given thoughtful consideration as the details of the program are developed.

Comment Received: Affordable Rental Recovery Program, the Action Plan should allocate significantly more funding for rebuilding affordable rental housing. The State should also increase the set-aside for affordable rental in order to dedicate funds specifically to rebuilding public housing, assisted and affordable housing, housing for persons with special needs, and other types of affordable housing listed in the Action Plan. We ask the State increase funding for rebuilding affordable rental housing be re-allocating the current funds set aside for the PREPS program alongside the leveraging of money currently held in the Rainey Day Fund.

Staff Response: The Texas General Land Office, in its method of distribution of funding, has worked diligently to ensure that CDBG-DR funds are administered in a manner that fosters the greatest level of recovery for the most people possible. The GLO will consider the suggestions made in this comment.

Comment Received: Local Infrastructure Program and Economic Revitalization Program, Infrastructure programs must prioritize the needs of LMI households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. Also key to economic recovery and future resilience is ensuring that jobs generated by recovery projects are filled by local workers and those who lost jobs due to the storm. To accomplish this, we strongly urge the state to fully enforce Section 3 of the Housing and Urban Development Act of 1968 (12 USC 1701u; 24 CFR 135).

Staff Response: The Texas General Land Office shall ensure that all infrastructure projects are implemented in a manner consistent with the low- or moderate-income benefit requirement presented in the Federal Register notice. The feedback provided in this comment pertaining to Section 3 enforcement will be given adequate consideration as recovery programs develop.

Comment Received: Public Participation, Reporting, and Public Access to Disaster Recovery Information, Meaningful public participation and comment require the direct engagement of impacted communities and individuals. Jurisdictions must actively seek out and engage affected communities, particularly, as required by CDBG regulations, those least likely to participate. We encourage the GLO to post information and data on the public website as progress of programs and projects is ongoing. We particularly urge the GLO to publish waiver requests and supporting documentation on its website, and allow public comment before the waiver request is submitted to HUD to keep the waiver process transparent.

Staff Response: The Texas General Land Office shall, as required by the Federal Register notice, ensure that certain documents are published to the GLO's disaster recovery website. Additionally, the GLO is committed to engaging with communities to ensure that all impacted citizens are given ample opportunity to participate in all levels of the recovery process.

Comment Received: The Houston-Galveston Area Council is requesting that the State of Texas pursue maximum flexibility in the use of the U.S. Housing and Urban Development Community Development Block Grant disaster recovery funds by request of waiver from HUD or by State Administrative action.

Staff Response: The Texas General Land Office remains committed to developing processes and procedures to foster a comprehensive long-term recovery for all Texans impacted by Hurricane Harvey. In developing these processes and procedures the GLO shall remain open to pursuing all options, to the greatest extent allowable under the law, that may contribute to a more effective and efficient recovery. If, at any time during the administration of CDBG-DR funds associated with this Action Plan, the GLO determines a waiver request would further these goals, it will pursue that waiver at that time.

Comment Received: HGAC requests that the State of Texas seek a waiver as it applies to the requirement that 70% of the aggregate of CDBG-DR funds be used to support activities benefitting the low to moderate income population within the impacted area.

Staff Response: The U.S. Department of Housing and Urban Development has established the requirement that 70% of the aggregate of CDBG-DR funds be utilized for the benefit of the low- and moderate-income population in the impacted area. This requirement may only be waived if it can be adequately demonstrated that the needs of the low- or moderate-income population within the impacted area have had their needs sufficiently addressed and met. If, during the recovery process, the GLO determines that this burden has been met in a manner that warrants a waiver request from the U.S. Department of Housing and Urban Development, it will pursue that option.

Comment Received: HGAC requests the Action Plan be expanded to include opportunities for regional and locally administered housing recovery programs.

Staff Response: The Texas General Land Office, as the primary administrator of CDBG-DR funds for the State of Texas, is committed to ensuring each impacted community retains the most local control feasible in determining the most effective use of disaster recovery funds while complying with the U.S. Department of Housing and Urban Development preferences for program implementation. The GLO shall continue to work with each impacted community, regardless of which entity is considered the primary administrator of the program, to ensure an efficient and effective recovery.

Comment Received: HGAC requests a reduction or removal of the low to moderate in come benefit requirement for infrastructure projects.

Staff Response: The U.S. Department of Housing and Urban Development has established the requirement that 70% of the aggregate of CDBG-DR funds be utilized for the benefit of the low- and moderate-income population in the impacted area. This requirement may only be waived if it can be adequately demonstrated that the needs of the low- or moderate-income population within the impacted area have had their needs sufficiently addressed and met. If, during the recovery process, the GLO determines that this burden has been met in a manner that warrants a waiver request from the U.S. Department of Housing and Urban Development, it will pursue that option.

Comment Received: HGAC requests that the Action Plan be modified in a manner that removes current limits on recovery efforts to buyout and acquisition.

Staff Response: The Texas General Land Office, in coordination with leaders in impacted communities, has determined that buyouts and acquisitions be given ample programmatic consideration in moving forward with the recovery process. If the needs of a particular community warrant other programmatic decisions, the GLO shall give those proposed changes thoughtful consideration.

Comment Received: HGAC requests that the Action Plan be revised to clarify which types of planning studies are eligible for completion by universities in the state and which are eligible for completion by vendors.

Staff Response: The Texas General Land Office has determined that the most effective process for conducting planning studies would be through the utilization of established research institutions within the state. If it is determined that the utilization of certain vendors makes for a more efficient process, then the GLO will consider the inclusion of those vendors at its discretion. Regardless, the GLO remains committed to ensuring the execution of planning studies that provide a direct benefit to the communities in which they are conducted.

14.2. Appendix H: Public Comments – Harris County

The public comment period was from June 27, 2018 to July 10, 2018. The following comments were received.

Commenter Name: Eva Thibaudeau

Organization: The Way Home CoC (Coalition for the Homeless)

Date Commented: June 27, 2018

Comment Received via email:

Hello and thank you for accepting our comments regarding the needs of homeless individuals impacted by Harvey. I am pleased to let you know that I am responding on behalf of the 100+ non-profits and funding entities that comprise The Greater Houston's homeless response system (Continuum of Care – CoC) known locally as The Way Home. My organization, the Coalition for the Homeless, serves as the Lead Agency for our community and has the authority to respond publicly on matters impacting homelessness.

We have worked closely with Harris County for many years, but most significantly since 2012, to solve the problem of homelessness. Each year, our community undertakes a massive count of persons experiencing homelessness who are both sheltered and unsheltered. In January 2018, the results of this count show that 18% of unsheltered respondents reported being homeless due to Hurricane Harvey. This number accounts for more than half of the increase in unsheltered homelessness this year. We are continuing to collect data regarding persons who are becoming homeless due to the impact of Hurricane Harvey.

Since 2012, our homeless response system has housed over 14, 500 individuals in permanent housing and ended their homelessness. This tremendous progress corresponded with a 63% reduction in overall homelessness. Unfortunately, Hurricane Harvey had a devastating impact on our community's most vulnerable citizens – those without a permanent, fixed, nighttime residence. The homeless response system answered the call and worked with our impacted community leaders to rapidly re-house nearly 1,000 individuals who were left with no viable exit strategy from the Red Cross shelters. This work continues today; as does the on-going impact of the storm.

The damaged housing stock in Harris County makes a tight housing market even tighter. On behalf of The Way Home and its 100+ partners, we would like to recommend consideration of the following activities in the County's plan as related to preventing and ending homelessness for our highly vulnerable citizens:

- Supportive services dollars to pair with rental subsidies to end household homelessness
- Rental subsidies to support a range of assistance (short to medium to long-term)
- Multi-family unit acquisition with units dedicated to permanent housing interventions for persons experiencing homelessness
- Acquisition of smaller properties (i.e., motels, former treatment centers, nursing homes, etc.) to accommodate the enhanced needs of persons experiencing homelessness who are suffering

from substance use disorders, serious mental illness and/or chronic health conditions that require assistance with activities of daily living
- Funds to bring existing apartments up to habitability standards for rental use by those exiting homelessness

On behalf of The Way Home CoC, we thank you for accepting these comments. We look forward to continuing to work together to prevent and end homelessness for the many impacted citizens of Harris County.

Sincerely,

Eva

Eva Thibaudeau-Graczyk, LCSW
Coalition for the Homeless
Vice President of Programs
The Way Home CoC Lead Agency/HMIS Administrator
713-882-8274 | homelesshouston.org
2000 Crawford Street, Suite 700, Houston, TX 77002

County Response: We thank the Coalition for its comment. The Harris County Supplemental Action Plan includes several services for those displaced and made homeless by Hurricane Harvey. While Homelessness was a priority issue in the county before the storm, post-Harvey homeless numbers and housing conditions have declined. The county has added homeless programs in the plan to include short-term mortgage assistance to prevent loss of housing and tenant-based rental assistance to assist LMI households, particularly those who were those who are homeless. Case management services will be a part of these programs as the county already has a department that provides case management services to assist households to find and secure safe, affordable housing and maintain that housing for the long-term. This existing program is in partnership with the Coalition for the Homeless/Way Home CoC. The county also expects to work with local housing developers, non-profits, and housing authorities to acquire/rehabilitate and build new affordable housing with a unit set aside for homeless populations.

Commenter Name: June Tyler

Organization: City of Baytown, Texas – Community Development Division

Date Commented: July 10, 2018

Comment Received via email:

- Will the County administer the Housing program County wide? Or will each jurisdiction be given the opportunity to "self-administer" the housing program? The City of Baytown would like Harris County to administer it's housing program within our corporate city limits.
- Will the County allocate Buyout/Acquisition funds by way of a MOD to the local governments for implementation similar to how H-GAC and other COGs did with their MOD's? If so, will the local governments be given control for the administration of these funds? The City of Baytown would like Harris County to administer buyout/acquisition programs within the city limits with coordination and approval of each project.
- Will jurisdictions be able to participate in the Competitive Application if they are also included in a local MOD?
- Does the County plan to administer all programs (housing & infrastructure) for the entire County and each jurisdiction receiving an allocation? Or, will the County allow jurisdictions to "self-administer" if they are able to show capacity and a proven track record on similar programs with similar allocations?
- If the City is able self-administer (and we realize it could potentially take months before funding is finally approved), we would like procure and secure administrative services immediately.

County Response: We thank the city of Baytown for its comments. The county will administer all housing programs countywide (outside the city of Houston). As one of its housing program, Harris County will also administer the buyout program in partnership with the Harris County Flood Control District and Harris County Engineer. The county requests to work with the small cities to development housing needs (including for a buyout program) within their jurisdiction and to market the housing programs to their residents.

If a city is named in the county's MOD, they cannot also participate in the competitive round RFP. Currently, the Texas General Land Office informs that the county will administer all CDBG-DR funding.

Commenter Name: Julie Robinson

Organization: City of Spring Valley Village, Texas – City Administrator

Date Commented: July 10, 2018

Comment Received via email:

See next page for letter

EST. 1955
SPRING VALLEY
VILLAGE

July 10, 2018

VIA EMAIL TO plancomments@csd.hctx.net
Harris County Community Services Department
8410 Lantern Point Dr.
Houston, TX 77054

RE: City of Spring Valley Village's Written Comments Concerning the Draft Harris County Supplemental Action Plan for Hurricane Harvey Community Development Block Grant Disaster Recovery Funding (Round One) ("Harvey CDBG-DR Round One")

Dear Sir or Madame:

The City of Spring Valley Village ("Spring Valley Village") respectfully submits the following written comments concerning the above-referenced Draft Harris County Supplemental Action Plan for Harvey CDBG-DR Round One ("Draft SAP") that was released on June 26, 2018. These written comments supplement any verbal comments made on behalf of the City of Spring Valley Village during any public hearings that will be held on the Draft SAP.

General Comments

- Spring Valley Village understands the expedited schedule within which HCCSD has had to develop the Draft SAP and greatly appreciates the work of the HCCSD staff in developing the Draft SAP.

- Spring Valley Village does not support the overall distribution of the Harvey CDBG- DR Round One funds between Housing and Infrastructure. Spring Valley Village is aware that the distribution in the Draft SAP matches the distribution that was outlined by HUD in Federal Register, Vol. 83, No. 28, February 9, 2018. However, based on the actual Unmet Needs as reflected in Table 1, Summary of Unmet Needs in Harris County (outside the City of Houston), on Page 3 of the Draft SAP, the distribution is inversely disproportionate at its most basic level. Table 1 of the Draft SAP reflects that the percentage of Unmet Need for Housing is 20% while the percentage of Unmet Need for Infrastructure is 80%. However, the percentage of the County Program Allocation that has been designated for Housing is 79%, and the percentage of the County Program Allocation for Infrastructure is a mere 21%. Spring Valley Village strongly encourages the County to reallocate the distribution of the Harvey CDBG-DR Round One funds proportionately to match the actual percentage of Unmet Needs for both Housing and Infrastructure or, in the alternative, to split the County's allocation equally between Housing and Infrastructure.

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- Spring Valley Village does not support the overall requirement that 70% of the County's Program Allocation (both Housing and Infrastructure) be used to benefit the low-to-moderate income ("LMI") populations. While Spring Valley Village is certainly sympathetic to the impact of Hurricane Harvey on LMI populations, the flood waters from Hurricane Harvey did not discriminate based on income. Most assuredly, an enormous amount of the non-LMI populations suffered severe and catastrophic loss from Hurricane Harvey. Spring Valley Village strongly encourages the County to split the County's Program Allocation equally between LMI and non-LMI populations. In the alternative, since 30% of the County's Program Allocation is available for providing relief to non-LMI populations, Spring Valley Village strongly encourages the County to utilize such portion of the allocation to benefit as much of the non-LMI populations as possible.

- Spring Valley Village requests clarification as to whether the County plans to administer all programs (Housing & Infrastructure) for the entire County and each jurisdiction receiving an allocation. Spring Valley Village requests that the County allow each jurisdiction to "self-administer" if they are able to show capacity and a proven track record on similar programs with similar allocations.

- Based on the June 29, 2018, Monthly CDBG-DR Grant Financial Report from the U.S. Department of Housing and Urban Development Disaster Recovery Grant Reporting System, the Texas General Land Office ("GLO") has a balance of $432,722,979.00 from the Hurricane Ike CDBG-DR funding that has yet to be utilized for any housing or infrastructure projects almost 10 years after Hurricane Ike. Spring Valley Village strongly encourages the County to request the reallocation of these funds to Harris County to be used to benefit non-LMI housing and infrastructure projects related to Hurricane Harvey.

Housing Allocation Comments

- Spring Valley Village does not support the overall requirement that 70% of the County's Program Housing Allocation be used to benefit the LMI populations. As the Draft SAP is currently written, there will be little to no relief for the thousands of non- LMI households that suffered and are still suffering from Hurricane Harvey. There are thousands of non-LMI households that remain displaced from their homes and/or are living in unrepaired homes because they, just like the LMI populations, were unable to afford flood insurance and/or their flood claims were denied by the National Flood Insurance Program ("NFIP"). Spring Valley Village strongly encourages the County to split the County's Program Housing Allocation equally between LMI and non-LMI populations. In the alternative, since 30% of the County's Program Allocation is available for providing relief to non-LMI populations, Spring Valley Village strongly encourages the County to utilize such portion of the allocation to benefit as much of the non-LMI populations as possible.

    - With the majority of the Harvey CDBG-DR Round One funding being allocated to benefiting housing needs of the LMI population, Spring Valley Village has serious concerns about the County's ability to actually utilize the entirety of the housing allocation for this purpose. After Hurricane Ike nearly 10 years ago, there was a similar amount of funding allocated to housing for LMI populations, and almost immediately there were issues with LMI individuals not being able to qualify for the housing funds for a variety of reasons – not the least of which was lack of clear title for their damaged properties. This problem occurred in almost every community that was impacted by

Hurricane Ike. Therefore, Spring Valley Village again encourages the County to split the County's Program Housing Allocation equally between LMI and non-LMI populations. In the alternative, since 30% of the County's Program Allocation is available for providing relief to non-LMI populations, Spring Valley Village strongly encourages the County to utilize such portion of the allocation to benefit as much of the non-LMI populations as possible.

Non-Housing Allocation Comments

- As reflected in the Draft SAP, the repair and enhancement of local infrastructure and mitigation efforts are crucial components of a comprehensive long-term recovery program. Spring Valley Village agrees that infrastructure activities are vital not only for the long-term recovery and restoration of housing but for the long-term recovery, protection, and viability of communities – regardless of the income levels of their populations.

- Spring Valley Village understands that a County level Method of Distribution ("Local MOD") under the Local Infrastructure Program has yet to be developed by HCCSD. In order to provide the most information to the public and all eligible cities, Spring Valley Village strongly encourages HCCSD to post all notices and the draft Local MOD on the home page of its website. When searching for the Draft SAP on the HCCSD website, it was difficult to actually locate the document without performing a specific search of the website. Posting all notices and the draft Local MOD on the home page of the HCCSD website would provide ease of access as well as transparency that would benefit the public, eligible cities as well as HCCSD.

- Spring Valley Village does not agree with implementing a damage level threshold of $1,500,000 in CDBG-DR funds to any local entity receiving funding through the Local MOD. The impacts of Hurricane Harvey affected every local entity in the entire Houston-Galveston region. It was obvious that water and flood control projects regardless of their location can and do have an impact on the surrounding areas - the flood waters did not observe any jurisdictional boundaries. While Spring Valley Village has no issue with funding direct damages to city facilities that resulted from Hurricane Harvey, there are numerous water and flood control projects that are absolutely necessary in cities that did not necessarily have direct damages that will reduce the flood risk of these cities and the surrounding areas. Therefore, there should not be a damage level threshold for the Local MOD in order for a city to be awarded funding under the Local MOD.

- With regard to the Local MOD, the draft SAP includes a plan to meet the 70% LMI benefit requirement. Spring Valley Village strongly encourages the County to split the County's Program Infrastructure Allocation equally between LMI and non-LMI populations. In the alternative, since 30% of the County's Program Infrastructure Allocation is available for providing relief to non-LMI populations, Spring Valley Village strongly encourages the County to utilize such portion of the allocation to benefit as much of the non-LMI populations as possible.

- Spring Valley Village requests clarification as to whether cities, either through the Local MOD or Competitive RFP Program, will have local control with regard to the program development and implementation of any funds if awarded. Spring

Valley Villages encourages the County to allow local control by cities for program development and implementation of any funds awarded. Additionally, Spring Valley Village asserts that cities should be allowed to allocate a percentage of their allocation for professional services (i.e. engineering, administration, environmental services, etc.).

- With regard to the Competitive RFP Program, Spring Valley Village requests that the first paragraph outlining the intent of the RFP Program on Page 44 of the draft SAP be clarified. While this paragraph specifically states that the intent of the RFP is to provide funding for *local infrastructure improvements*, the previous sentence limits those local infrastructure improvements to repairing and rebuilding infrastructure and facilities impacted by Hurricane Harvey. While Spring Valley Village has no issue with funding direct damages to city infrastructure and facilities that resulted from Hurricane Harvey, there are numerous water and flood control projects that are absolutely necessary in cities that did not necessarily have direct damages that will dramatically improve public, residential and commercial concerns by mitigation of flooding, reducing storm water on roadways and properties, conveying storm water into the appropriate channels, and providing shelter to displaced residents. Spring Valley Village requests that the Competitive RFP Program be available for all local infrastructure improvements and not limited to only repairing damaged infrastructure/facilities.

- It is unclear in the draft SAP whether cities will be able to participate in both the Local MOD as well as the Competitive RFP Program, or if cities will be limited to participation in one or the other. Spring Valley Village requests clarification with regard to the ability of cities to participate in both the Local MOD and the Competitive RFP Program.

- Since the draft SAP reflects a requirement that 70% of Infrastructure projects benefit LMI populations, Spring Valley Village requests clarification as to how cities and/or projects that do not have a high LMI percentage, but do address local and regional storm related impacts, access the Hurricane Harvey CDBG-DR Round One funds.

The City of Spring Valley Village appreciates the opportunity to provide its comments on the Draft SAP. Should you have any questions or require clarification of any of the information provided herein, please do not hesitate to contact me by phone at (713) 465-5306 or by email at jrobinson@springvalleytx.com.

Sincerely,

Julie M. Robinson
City Administrator

c: Honorable Mayor and City Council Members

County Response: We thank Spring Valley Village for its comments.

- Per the Federal Register and based on GLO guidance in their Action Plan, all housing unmet needs must be administered before significant progress can be made on non-housing/infrastructure unmet needs. The Federal Register proscribes that a minimum of 79 percent of CDBG-DR funding in Round One will be for housing related programs and to alleviate unmet needs in local housing affected by Hurricane Harvey. The U.S. Congress has set aside a greater amount in CDBG-DR funding Round Two continue the assistance on non-housing/infrastructure unmet needs.
- Per the Federal Register, 70 percent of CDBG-DR funding must be used to benefit low- to moderate-income households (one of HUD National Objectives), whether under housing or non-housing/infrastructure CDBG-DR programs. Once this threshold is met, funding can be used to meet the HUD National Objective of urgent need.
- The CDBG-DR program requires all projects show that the problem the proposed project for CDBG-DR funding seeks to alleviate be directly related to Hurricane Harvey as well as meeting the 70 percent low- to moderate-income benefit discussed above. The county's MOD takes into account damage levels, percentage of low- to moderate-income population, and level of unmet needs of all jurisdictions.
- Currently, the Texas General Land Office informs that the county will administer all CDBG-DR funding. The county will work with all cities with CDBG-DR awarded projects to develop the projects including engineering/design activities. Environmental Review will be performed by the county as requirement by the GLO as the responsible entity of CDBG-DR funding.
- If a city is named in the county's MOD, they cannot also participate in the competitive round RFP.

Commenter Name: The Metropolitan Organization (TMO)

Organization: The Metropolitan Organization

Date Commented: July 10, 2018

Comment Received via email:

The Metropolitan Organization
Gulf Coast Leadership Council
4141 Southwest Freeway Suite # 650,
Houston, Texas 77027
Email: tmo@tmohouston.net

Memo

TO: County Judge Ed Emmett
Commissioner Rodney Ellis
Commissioner Jack Morman
Commissioner Steve Radack Commissioner R. Jack Cagle

FROM: The Metropolitan Organization

DATE: July 10, 2018

RE: Action Plan for Hurricane Harvey CDBG Disaster Recovery Funding

Thank you for the opportunity to provide comments on the "Hurricane Harvey CDBG Disaster Recovery Funding (Round One)" Draft Action Plan. This letter represents the collective comments of the congregations that are members of The Metropolitan Organization. TMO has hosted 10 home repair intake sessions in partnership with the LISC collaborative and there were nearly 300 clients in attendance. Approximately, 80% of these clients did not have an active case manager working on their case and for some, these sessions were their first interaction with a case manager or home repair agency. **The need for quality disaster case management is extreme.** After reviewing the Draft Action Plan, we would like to make the following recommendations:

Bestow an equity-based approach to recovery efforts by ensuring low-income families qualify for mitigation and buyouts as described in the Chapter 19 Floodplain Management Data Analysis.

As an extension of larger community recovery programs, ensuring individual homeowners can benefit in recovery efforts by benefiting from flood mitigation and buyout initiatives will help create a more resilient community development plan. Low-income homeowners will benefit the most from a housing plan that places them in areas where they will not be subject to chronic flooding, expensive flood insurance, or the cost of elevating a home. Therefore, it is imperative that funding be allocated directly to these types of individual homeowners who otherwise would be subject to further weather implications, impeding their path to recovery.

Quality Case Management is essential to recovery and investment is needed to ensure an individual's personal route to full recovery.

Recovery Programs are only as effective as the quality Case Management available to help people who are recovering from the storm to navigate the complex programs systems for recovery. Based on our estimates, there are not enough Case Managers to fulfill the needs of people in need of recovery support. Even with additional Case Managers being made available through federal contracts and some of the City resources, ensuring that the Case Managers are well-trained and effectively coordinating with all of the other entities involved in recovery is paramount for effective recovery. For housing programs to be successful in helping people effectively, investment in case management and ensuring effective coordination with other service providers will be key to an individual's route to full recovery. Case Management and Housing Programs are interdependent, and the Action Plan as well as subsequent program design should address the relationship it foresees with case management agencies moving forward into recovery.

Funds should be made available to assist qualifying low income families in resolving title and tax issues so they can receive housing assistance from CDBGDR funded programs.

We have found that a significant obstacle to some low income households receiving assistance from FEMA or through CDBGDR funded programs is the fact that they do not have clear title to the home they have inherited from family members. In low income communities, possession and ownership of real estate passes informally from family member to family member over many years. Since many people die without wills, there are numerous heirs with potential interest in the property. Since it takes the time of experienced lawyers to help resolve these issues, funds should be allocated to assist families to resolve title issues where that is possible. Likewise, families have unpaid taxes and other obligations that will block them from accessing housing program funds. A well-crafted program to help homeowners set up reasonable payment plans could result in more families being able to take advantage of the Housing Assistance Program.

Commit to full transparency and accountability for the benefit of increasing trust in the recovery process to the homeowner and people recovering from the storm.

There is no doubt that another storm will eventually land on the Gulf Coast and within the Houston area. The current sentiment we are hearing from households affected by the storm is confusion and lack of trust because of the difficulty in securing accurate, complete information

on the steps to recovery. We understand that numerous parties play a role in this (federal, state and local governments as well as the nonprofit sector). A well-designed system that allows for transparency and accountability in the recovery process can build trust between residents and the public sector, which will help in times of recovery. The Local Action Plan has the capability to make amends with residents who feel disenfranchised and give hope that they will not be left behind in the rebuilding process. Using our recovery resources to build systems that serve us now in Harvey recovery while also improving our readiness for the next event is welcomed. The intentions of the Action Plan must take into account those populations who are most vulnerable and offer a clear pathway in a very difficult situation.

Again, we appreciate the opportunity to provide comments to the Action Plan. We as a collective are eager to work with Harris County to ensure a successful recovery for our county's vulnerable communities. Thank you for your attention and consideration of these recommendations into the "Hurricane Harvey CDBG Disaster Recovery Funding (Round One)" Action Plan.

County Response: We thank TMO for their comments.

- Per the Federal Register that establishes these CDBG-DR funds, 70 percent of CDBG-DR funding must be used to benefit low- to moderate-income households (one of HUD National Objectives), whether under housing or non-housing/infrastructure CDBG-DR programs. Harris County seeks to ensure that low- to moderate-income households have access to CDBG-DR funding for home rehabilitation/reconstruction including flood mitigation, fair buyout of flooded homes and incentives for a replacement home that is safe and in an area of reduced flood risk and does not cause additional cost burden, and construction of new affordable renter- and owner-occupied housing.
- Each of these programs will come with quality case management to assist those affected by Hurricane Harvey navigate the programs. Harris County has also been and will continue to work with case management groups in the county to educate on the county's programs.
- The county is working and will continue to work with non-profit legal services to assist the public with resolving title issues. The programs under the county's action plan will work with individuals to reduce barriers created by title and tax issue to assist them to successfully navigate our systems.

Commenter Name: Cyrus Reed

Organization: Lone Star Chapter of the Sierra Club

Date Commented: July 10, 2018

Comment Received via email:

July 9, 2018

The Lone Star Chapter of the Sierra Club is pleased to offer these brief comments on the Long-term Housing Plan for Harris County. Separately, the Sierra Club through the local Houston group is also signing onto comments submitted by the HOME coalition, and we are in full support of those comments as well. Thus, some of our comments here are repetitive to those comments.

We wanted to reiterate that Harris County will need to not only promote compliance with modern building codes and standards, but enforce those provisions most likely through third-party inspectors, since Texas law does not currently allow direct inspections by county officials. We want to assure that in this plan or future MODs such inspections are paid for and included, and that third-party inspectors, builders and contractors are aware of the codes they must meet and properly trained as appropriate.

Thus, we repeat below the comments submitted by the Home Coalition.

Promote environmentally-friendly standards*.* Any repair or reconstruction should follow modern and energy-efficient building codes and standards. Reconstruction, repair and new construction of residential buildings should follow the Energy Star program, and/or the HUD CPD Green Building Retrofit Checklist for non-substantially damaged residential buildings. In addition we recommend requiring the following standards:

- Require the 2015 International Energy Conservation Code for all commercial buildings, including multi-family buildings over three stories
- Require new residential buildings be built solar-ready, thus easily able to incorporate solar energy in the future by reserving adequate roof space
- Require compliance with modern plumbing codes, such as the 2015 UPC or 2015 IPC, which will help lower utility and energy bills
- Give priority to new construction or major reconstruction of multi-family buildings that are designed to meet a more robust standard, such as the ASHRAE 189.1 - 2014 Standard for the Design of High-Performance Green Buildings, or the recently published ASHRAE 189.1 - 2018 Standard for the Design of High-Performance Green Buildings.

Ensure proper oversight and quality control of construction*.* The County should require certified quality and code compliance inspections on all projects. Funding should also be allocated to train contractors, building code officials and builders on code compliance. Every project must have at least a midpoint and final inspection completed by a trained inspector and based on publicly available inspection criteria. Inspection criteria should be reviewed by community, aid, and constructions groups before finalized.

There also must be a hotline for concerns with construction and contractors, although it should be assumed most issues will not be reported. Therefore a third party agency entrusted with quality control should proactively contact every family within one week of each inspection to detect any issues. Every family must have a copy of the hotline number, final inspection criteria, their work order, and program details.

Secondly, we want to ensure that Harris County gives special attention to the communities impacted by both Harvey, repeated flooding and environmental degradation and pollution, and that the buyout program is fair for families. We would suggest that Harris County use a small amount of the administrative monies to beef up monitoring and inspection equipment. Thus, the county could consider using a small amount of the funds for purchase of actual monitoring equipment such as a Trace Atmospheric Gas Analyzer (TAGA) or handheld gas leak detection cameras to better protect the community from future events and assure spills and air emission events are properly catalogued and monitored.

Make buyouts fair for families. The buyout program should make people whole. In other words, no family should have to take on additional debt to relocate to a comparable home in a safer neighborhood. If a family owns a three bedroom home free and clear, the relocation funds they receive should be enough to purchase a three bedroom home free and clear in a location suitable to the family's needs with no threat of flooding. The County should also establish a minimum buyout per household of no less than $200,000 (including any accompanying "housing incentive"). Failing to fully fund relocation costs will also exclude the lowest income families from buyout programs, abandoning them in high-risk neighborhoods.

Neighborhoods or neighbors that were doubly impacted by flood waters polluted with chemicals, oils, waste, or sewage as indicated with overlays should be prioritized for buyouts. By doing so, the County of Houston can simultaneously mitigate the risk of flooding and hazardous toxics. Areas that face environmental and flooding risks should also be considered for additional funding for clean-up and better monitoring. Properties that are bought out should not be redeveloped for housing, or major non-green infrastructure projects.

Consider Pilot Revolving Loan for Housing

Finally, the County could consider implementing a pilot revolving fund --principally for middle-income families who may not qualify for grants but may not have access to loans -- for a zero or slight interest rate for fixing up their homes and making them more resilient, energy-efficient and water-efficient. Such funds -- sometimes called WHEEL (Warehouse for Energy Efficiency Loans) -- would supplement the other programs contained in the housing plan. We would suggest a small amount of funds for single-family home repair be dedicated to such a revolving fund, such as $2 million. This public money could also attract private money.

Sincerely,

Cyrus Reed, Conservation Director
Lone Star Chapter, Sierra Club

County Response: We thank C. Reed of the Lone Star Chapter Sierra Club for his comments. Harris County does provide inspection services for all projects under its CDBG-DR program. Working with the County's Engineer, the county sets standards for rehabilitation and construction that incorporates IECC, Energy Star, Green Building and other local building codes for CDBG-DR projects. The county has paid inspectors on staff and uses third-party inspection services to augment staff as needed. These inspectors are well trained and have the required certifications to perform the work.

Harris County has Affordable Housing Standards for construction of housing which include our criteria. These Standards can be found on our Harris County CSD website at https://csd.harriscountytx.gov/Pages/rfq.aspx.

Harris County seeks to ensure that low- to moderate-income households have access to CDBG-DR funding for fair buyout of flooded homes and incentives for a replacement home that is safe and in an area of reduced flood risk and does not cause additional cost burden. The county has developed several incentives and homebuyer programs that will provide additional funding to purchase a replacement home. Case management and navigation services will also be available to assist buyout participants. Moving cost are also included in the assistance. The Harris County Residential Buyout Program Guidelines provide a detailed description of the program and incentives.

The county will research the eligibility of a pilot revolving loan fund for home repair, however this type of program is currently not an available under the Texas Action Plan, however, the county will work with the Texas GLO to research its eligibility under CDBG-DR and the State's Action Plan.

Commenter Name: HOME Coalition Members

Organization: HOME Coalition

Date Commented: July 10, 2018

Comment Received via email:

Re: Draft Supplemental Action Plan for 2017 CDBG-DR Funds (Round 1)

To Whom It May Concern:

The Houston Organizing Movement for Equity (HOME) Coalition commends the County's recognition that rebuilding a stronger, more resilient community canno happen unless it is also a more equitable community and its recognition that low- and moderate-income families must be prioritized for assistance. The draft CDBG-DR Local Action Plan is a good step forward, which the HOME Coalition believes can b strengthened by incorporating the following recommendations to the plan itself and program design. We appreciate the County's ongoing commitment to listen to community voices as the recovery moves forward and stand ready to assist you in that work.

We offer the following recommendations for strengthening the County of Houston's draft Local Action Plan:

Prioritize low- and moderate-income families. The County should allocate 100% of the funding to families at 80% AMI and below. For a family of four in Harris County, 80% AMI is $59,900, almost four times the annual income of one breadwinner earning minimum wage. Not only are low- and moderate-income families the least likely to have disposable income or other resources available and the most housing cost-burdened, but unmet needs calculations show that these families also have overwhelming unmet needs. As the Action Plan acknowledges, "[t]he scarcity of safe, quality affordable housing in Harris County has caused a severe housing burden and disproportionate housing needs particularly among African American, Hispanic and large family (5+ persons) households."

The prioritization of LMI families in the homeowner repair and rehabilitation program, for example, is appropriate and commendable.

Allocate funds proportionally by household income. We understand that the Harris County Needs Assessment will determine the recommended proportions of funding that should be set aside for LMI and non-LMI populations. We specifically want the County to commit to dividing all funding sources in each program activity by income categories. The brackets of LMI should follow the traditional 0-30%, 31-50%, 51-80% of AMI divisions and serve those categories proportionally based on estimates of households harmed in the storm. These income categories should be applied to all housing programs, including single family

rehabilitation/rebuild, repair reimbursement, new single family home construction (to the extent possible), single family
rental, and construction of multifamily housing etc. In any infrastructure improvement projects, the needs of LMI families and communities should be prioritized.

The local needs assessment *must* go beyond the analysis of flawed HUD/FEMA demographic IA data that undercounts the needs of LMI homeowners and renters.. As the County acknowledges in the Action Plan, "[w}hile LMI households made up over 70 percent of the FEMA IA applicants in the county only about 20 percent of NFIP resources went to LMI areas. This indicates that LMI households were likely under-represented in the NFIP claims due to inability to afford flood insurance and high claims denial rates by NFIP." LMI households also received fewer SBA loans.

Within Harris County (outside the city of Houston), SBA Disaster Home Loans to those who could avail totaled $67,065,960 as of December 2017. The average loan disbursed by December 2017 was $21,324 and tended to be awarded to those of gross incomes higher than area median. The gross income of those to whom SBA Disaster Home Loans had been disbursed averaged $117,192 as of December, 2017. Only 15% of these loans were written to renters.

LMI families have received the least help and have the largest remaining unmet need.

FEMA data itself indicates that renters were particularly likely to be denied FEMA assistance. "FEMA Registrants included 171,622 owner-occupied households and 150,221 renter-occupied households. For Harris County (outside the city of Houston), there are 61,828 applicants with a FVL of over $0. Of these, 45,634 (73.8 percent) were owners and 16,175 (26.2 percent) were renters." Homeowners and renters applied for help in roughly equal numbers, but only 26% of renters affected by Harvey got help, as opposed to 73% of homeowners.

Harris County's Action Plan is very clear that it understands the flaws in FEMA data.

It should be noted that the FEMA IA for Harris County (outside the city of Houston) listed only 4,460 total applicants who were age 60 and over with only 958 applicants with a FVL over $0 and who received some FEMA assistance. Harris County has more than 300,000 residents over the age of 60. ***The county believes based on anecdotalaccounts of canvassers, case management agencies, and rebuilding organizations that the FEMA numbers for seniors, who had a FVL over $0 and received some assistance, significantly underestimate the unmet needs of seniors in Harris County****.* (emphasis added)

This is the kind of information and data that must be incorporated into the local needs assessment for other populations to account for flaws in FEMA data.The local needs assessment must pay particular attention to LMI residents of Harris County, particularly the lowest income families. HOME strongly supports a proportional allocation, but it must be based on a more accurate unmet needs assessment that reflects the real levels of unmet need for

low- and moderate-income Houston families. We recommend using Texas Housers alternate methodology to re-assess unmet needs. (attached)

Program selection and design must also reflect the urgent disaster recovery needs of low- and moderate-income disaster victims.The County must assess, given the proposed programs in the Action Plan, how people affected by Harvey in the three income brackets (0-30%, 31-50%, 51-80% AMI) will be proportionally served, as well as whether there will be a discriminatory impact on disaster victims based on their race or other protected class status.

Create family-sustaining jobs. Rather than embedding job creation into the Economic Revitalization and Public Services Programs, the County should create a stand alone program specially for disaster recovery that ties direct deliverables to local hire and earn-and-learn job training. The County should prioritize creating family-sustaining jobs for local residents by creating a Disaster Recovery Workforce Development and Training Program. As the County rebuilds, local residents impacted by the storm should be given priority for jobs created by the rebuilding process. Such a program would ideally create a pipeline to train and introduce low to moderate income residents from Harvey impacted neighborhoods to construction career jobs, by partnering with local pre-apprenticeship programs that will offer direct entry into a DOL-registered apprenticeship or DOL-certified third party accredited bilingual craft training program. The Disaster Recovery and Workforce Development Training Program agreement should also require that disaster related apprentices be placed on eligible new construction, repair, remodel, or renovation projects, including those designated as Better Builder® sites, identified in the Disaster Recovery Workforce Development component of the plan. This will ensure fair wages, workers compensation coverage, health and safety protections, and independent compliance monitoring intended to help families in impacted areas gain viable access to career pathway.

The Action Plan indicates that the County will participate in the Economic Revitalization program, but does not provide any needs assessment numbers demonstrating the need for this program or any detail about what those specific activities will be. These must be included in the final action plan.

Ensure public services programs match needs. We recommend that the County prioritize the following public services that have increased access to disaster recovery programs for lower income families and communities of color following past disasters:

- Legal Services, particularly to help families clear title so they can access mobility and buyout programs, as well as philanthropic assistance. The State funded a successful title clearing project following Hurricane Ike. The issue of heirs' property disproportionately affects Black families and communities.
- Comprehensive and effective mobility counseling to ensure that both renters and homeowners can make informed choices about where to live and have access to less vulnerable neighborhoods.
- Job training programs that prepare local residents for the jobs associated with disaster recovery programs, both construction and administrative.

● Navigators/case coordinators that can help families through the process of applying for benefits and the recovery process, and connect them to other services if necessary.

Extend rental affordability. Any multifamily property funded by CDBG-DR funds must be subject to a Land Use Restriction Agreement (LURA) requiring a 40 year minimum affordability period for affordable units. This 40 year period preserves affordability for developments that otherwise would be converted into market rate units in transitional areas over the course of time.

In addition to longer-term affordability, the Harris County Affordable Rental Program Notice of Funding Availability (NOFA)/Request for Proposal should incentivize additional affordability and accessibilty and rebuilding in safer and higher opportunity areas that mitigates future disaster vulnerability. We applaud the list of primary selection criteria that Harris County has included in its Action Plan, particularly the first four criteria.

i. Located in High Opportunity Zones; and areas of revitalization as demonstrated by other public and/or private investments in such areas.
ii. Targets extremely low-income (30 percent AMFI);
iii. Exceeds the number of LMI units eligibility requirement;
iv. Serves persons with disabilities beyond minimum requirements;
v. Leverages public and private financing; (may request waiver to fully fund certain developments to expedite project completion)
vi. Activity type; and
vii. Cost-effectiveness.

We note, however, that when locating affordable rental housing in “areas of revitalization”, the relevant public and/or private investment (the County should require evidence of both) must be substantive and substantial. The location of affordable housing in historically disinvested, distressed, and minority-segregated areas, particularly given this long-term siting pattern in Harris County, is a violation of the County’s obligation to affirmatively further fair housing and may be discriminatory in and of itself.

Make buyouts fair for families. Local buyout and acquisition programs must prioritize LMI households in floodways and floodplains, who have the least resources which which to relocate on their own, leaving them a choice between housing instability and potential homelessness or continuing to live in homes that may be structurally compromised or present health risks because of mold. We commend that Harris County is making this program available first to LMI families.

It is particularly critical for LMI families this buyout program includes assistance not only acquisition and demolition, but relocation payment and assistance as well. As the Federal Register Notice states, “a buyout program that merely pays homeowners to leave their existing homes does not result in a low- and moderate-income household occupying a residential

structure and, thus, cannot meet the requirements of the LMH national objective." (83 FR 5863) Local buyout programs should include plans to build housing in safer areas. In other words, no family should have to take on additional debt to relocate to a comparable home in a safer neighborhood.

As the Action Plan lays out, "[o]f the 43 buyout interest areas, the county has identified 13 areas that are in low- to moderate-income areas and or in Social Vulnerable areas. Seven of the 13 areas have an average home market value of under $85,000, the lowest average home market value was $27,105 in the community of Allen Field. As stated in the above section G.1. Real Estate Market, median home price in Harris County is $160,000. The low market value of the homes to be bought out to the higher median home price may place a severe cost burden on low-income and vulnerable populations to find safe, quality affordable replacement housing.

We appreciate the County's recognition that "[a]dditional housing incentives, the creation of new affordable housing, and homebuyer assistance programs will be needed to alleviate this
burden."

The buyout program should make people whole. If a family owns a three bedroom home free and clear, the relocation funds they receive should be enough to purchase a three bedroom home free and clear in a location suitable to the family's needs with no threat of flooding. The County should also establish a minimum buyout per household of no less than $200,000 (including any accompanying "housing incentive"), based on the median home values above. Failing to fully fund relocation costs will also exclude the lowest income families from buyout programs, abandoning them in high-risk neighborhoods.

Neighborhoods or neighbors that were doubly impacted by flood waters polluted with chemicals, oils, waste, or sewage as indicated with overlays should be prioritized for buyouts. By doing so, the County of Houston can simultaneously mitigate the risk of flooding and hazardous toxics. Areas that face environmental and flooding risks should also be considered for additional funding for clean-up and better monitoring. Properties that are bought out should not be redeveloped for housing, or major non-green infrastructure projects.

We commend Harris County for thinking about preserving neighborhoods and communities as part of buyout programs.

As a public/private partnership approach, Harris County will build on national community development & housing finance models that promote quality larger scale neighborhood development for LMI families that is context sensitive and aims toward implementing mixed-income/mixed use development styles. ***LMI families affected by flooding especially those experiencing repetitive flooding, will enjoy opportunities to relocate with their neighbors from these flood prone areas, thus preserving community cohesion, sustaining the local tax base, and local institutions such as schools, and other community assets.*** (emphasis added)

The HOME Coalition also applauds the community revitalization aspect of Harris County's proposed buyout program:

As a separate initiative under this program, the county will identify LMI target areas in need of community revitalization and that were highly impacted by Hurricane Harvey and other recent disaster events. These areas will need a comprehensive approach to improve housing, infrastructure, and facilities to achieve reduced future flood loss and resilience. ***It is the county's intent as we improve housing through rehabilitation, reconstruction, and new construction to also improve the neighborhood's drainage and other infrastructure that serve those homes in the LMI target area.*** *For if the drainage and infrastructure are not corrected, any repairs or new construction of housing will be flooded in the next disaster event just as these homes have been affected by 2016 Floods and Hurricane Harvey.* (emphasis added)

This kind of comprehensive investment strategy in historically disinvested neighborhoods is one of our priorities.

Prioritize intentional and ongoing community engagement. The County should proactively seek out partnership opportunities with community-led groups to better understand and address the needs of low-income people and communities of color. This will be particularly critical around its buyout programs. Community organizations should also be at the heart of doing outreach and bringing people into the rehabilitation process. To ensure deep and rigorous community input, the HOME Coalition would like to meet with County staff and contractors designing the programs early and often, from the program design and the RFP stage to program completion. Additionally, we recommend the creation of a community engagement advisory board made up of community leaders to provide the County with regular input. We recommend prioritizing community leaders from the zip codes with high unmet needs as members of the advisory board.

<u>We offer the following recommendations for program design and implementation:</u>

Ensure the system is easily navigable through quality case management and transparency. One of the most challenging parts of the recovery for residents has been understanding programs, preparing paperwork, and applying for assistance. Information must be presented clearly and quality case managers must be available to assist in navigation. Residents and case managers must be able to easily know their status in recovery programs and understand eligibility, denials, and ability and the appeal process.

Administer a title clearance program to ensure all otherwise eligible homeowners are able to receive assistance. Inability to show clear title because of heirs' property ownership is a barrier to choosing to move to a safer location, particularly for African-American homeowners . The State of Texas has successfully addressed this issue in disaster recovery programs in two ways. First, in 2009, the Texas Legislature passed HB 2450, which allowed the agency administering CDBG-DR to accept alternative proof of ownership, including an Affidavit of Heirship, for purposes of disaster recovery programs that repaired or rebuilt homes in place. Second, following Hurricanes Ike and Dolly, the State funded the Texas Title Project,

which helped LMI households clear title and access, in particular, the State's homeowner mobility program, allowing them to choose to move to a safer area rather than rebuild in place.

Include a homeowner mobility program like the post-Ike/Dolly Homeowner Opportunity Program (HOP). While the eligible activities include "new construction", which would allow relocation activities, the County should explicitly include a homeowner mobility program like the post-Ike/Dolly Homeowner Opportunity Program (HOP), which allows eligible homeowners to choose to move to lower-risk higher opportunity area rather than rebuild in place, in its Homeowner Assistance Program. The HOP program, created after Hurricanes Dolly and Ike, was the first of its kind nationally. As of February 17, 2017, 282 households, or 9% of total applicants for homeowner assistance had been successfully relocated to safer, higher opportunity areas.

The HOP program not only provided homeowners with a choice of whether to move or rebuild in place, but it included services like mobility counseling and real estate assistance to help ensure that the choice was an informed one, as well as using a formula determined benefit amount that the choice to relocate a real one for LMI families. The State and regional Councils of Government have experience running a homeowner mobility program that is a source of valuable lessons learned on how to improve the program, a resource for other voluntary and mandatory buyout programs, and will allow this program to be established quickly following HUD's approval of the State's draft Action Plan (as amended to include a homeowner mobility program.)

Including a homeowner mobility program not only increases resiliency and mitigates the impact of future disasters by allowing homeowners to move to safer and less disaster-vulnerable areas, but also ensures that the State can truthfully certify that it is in compliance with civil rights laws and its obligation to AFFH. Homeowner Assistance Programs that lock homeowners into rebuilding in place, because of historical segregation imposed by federal, state, and local government policies, may perpetuate segregation in violation of the Fair Housing Act and/or result in the use of federal financial assistance in a way that discriminates based on race, color, and national origin, even if the State lacks any discriminatory intent.

Do not use pre-storm value of a home to determine disaster recovery program assistance because it often produces a discriminatory impact on the basis of race and ethnicity. Following Hurricane Katrina, a lawsuit was filed against the State of Louisiana and the U.S. Department of Housing and Urban Development (HUD) alleging racial discrimination in the State's CDBG-DR funded Road Home Program, which provided grants to homeowners to repair or rebuild their homes. The original grant formula was based on the pre-storm value of a home, which resulted in African-American homeowners receiving less repair money than White homeowners, because their homes were located in neighborhoods with lower home values due to market discrimination and the legacy of segregation.

Many African-American families were left unable to complete repairs or return home or were left living in uninhabitable houses. As Louisiana Congressman Cedric Richmond said when the case was settled in 2011,

"[e]veryone knew that the Road Home formula for calculating grant awards was deeply flawed and punished folks in neighborhoods where home values were lower. . . After all, if two families are both rebuilding a three bedroom home then their construction costs will be the same—regardless of the neighborhood. In that case, each family deserves the same assistance from their government. Unfortunately, the flawed formula was effectively discriminatory, locking many families out of equitable assistance. ***[5]***

The lawsuit (which resulted in a change to the Road Home formula) and settlement resulted in an additional $535 million in repair and rebuilding funds for LMI homeowners in the four most impacted parishes in Louisiana.[6]

As the Action Plan acknowledges, the buyout program must be accompanied by additional funding for LMI families in order to ensure that it is equitable and successful.

Do not include demolition costs in maximum assistance calculations for the homeowner assistance program.
Including this cost for reconstruction of homes will put reconstruction out of reach for many households, since the cost of reconstruction included in the guidelines references only a standardized cost based on household size, not cost of construction plus demolition of a prior structure.

Provide assistance for those who became homeless as a result of the hurricane. This includes over 3,800 evacuee households living in hotels through the Transitional Shelter Assistance (TSA) program.
Some of these households will have a place to return to once
repairs are completed on their housing. Many of these households, however, particularly renter households who are dependant on whether third parties rebuild, will not have stable housing after TSA ends and may become homeless.

No mold left behind. Any house that has had any kind of repairs since the storm, particularly those repaired through PREPS, should be inspected for mold and moisture, and unless the home is going to be demolished and rebuilt, the mold must be properly treated. The inspection must require checking for mold behind sheetrock, behind bathtubs, and in sub-flooring, as well as ensuring that any flooded, porous material has been removed, as this was neglected in the PREPS program and other rebuilding. Families should be presented the option of gaining a Certificate of Mold Damage and Remediation. If homes are gutted, they must be properly remediated and dried in line with the CDC and NIEHS's guidelines. Assessment for rebuilding costs must include any necessary gutting and treatment.

Promote environmentally-friendly standards. Any repair or reconstruction should follow modern and energy-efficient building codes and standards. Reconstruction, repair and new construction of residential buildings should follow the Energy Star program, and/or the HUD CPD Green Building Retrofit Checklist for non-substantially damaged residential buildings and

should at a minimum meet the 2015 International Energy Conservation Code (or the equivalent chapter of the 2015 International Residential Code**)**. In addition we recommend requiring the following standards:

- Require the 2015 International Energy Conservation Code--as is required by state law--for all commercial buildings, including multi-family buildings over three stories
- Require new residential buildings be built solar-ready, thus easily able to incorporate solar energy in the future by reserving adequate roof space
- Require compliance with modern plumbing codes, such as the 2015 UPC or 2015 IPC, which will help lower utility and energy bills
- Give priority to new construction or major reconstruction of multi-family buildings that are designed to meet a more robust standard, such as the ASHRAE 189.1 - 2014 Standard for the Design of High-Performance Green Buildings, or the recently published ASHRAE 189.1 - 2018 Standard for the Design of High-Performance Green Buildings.

Ensure proper oversight and quality control of construction. The County should require certified quality and code compliance inspections on all projects. Funding should also be allocated to train contractors, building code officials and builders on code compliance. Every project must have at least a midpoint and final inspection completed by a trained inspector and based on publicly available inspection criteria. Inspection criteria should be reviewed by community, aid, and construction groups before finalized. There also must be a hotline for concerns with construction and contractors, although it should be assumed most issues will not be reported. Therefore a third party agency entrusted with quality control should proactively contact every family within one week of each inspection to detect any issues. Every family must have a copy of the hotline number, final inspection criteria, their work order, and program details.

Increase Theft of Service Enforcement. Even before Hurricane Harvey, wage theft was an issue in the Harris County construction industry. The Texas Penal Code Section §31.04, criminalizes Theft of Service; the intent to avoid payment for services rendered. In 2011, the Texas Legislature passed SB 1024, the Wage Theft Law, to clarify that the failure of an employer to pay an employee for work performed may be investigated and prosecuted as Theft of Service under the Texas Penal Code. The Harris County District Attorney should:

- Convene a meeting with the Houston Police Department and the Harris County Sheriff's Office to establish a streamlined and accessible system for workers to make Theft of Service reports county-wide;
- The Houston Police Department and Harris County Sheriff's Office should designate a point of contact in their offices for community organizations who assist workers in making such complaints, and establish a regular meeting between its office and our organizations to follow up on enforcement efforts;
- Provide training to Assistant District Attorneys about wage theft, the 2011 amendments to the Theft of Service Statute, and the proper protocols to follow when investigating and prosecuting such cases;

- Collaborate with community and labor organizations in theft of service enforcement efforts, and support community education efforts to advise Harris County workers and employers that local law enforcement will take theft of service reports seriously.

Offset the burden of insurance. We recommend that Homeowner Assistance Program, Homebuyer Assistance Program, and Buyout Program funds pay for three years of flood insurance for recipient families for whom insurance is a significant financial strain (specifically households at 80% AMI and below).

Approve local infrastructure proposals based on the most urgent needs. An evaluation of whether "infrastructure activities … contribute to the long-term recovery and restoration of housing" should include a review for specific and articulable ways the proposal prioritizes the needs of communities with substandard infrastructure as a result of discrimination and disinvestment. While we understand that this may feel unequal to individual jurisdictions, it would be the most effective use of disaster recovery funding. In addition, infrastructure proposals should be reviewed to ensure that potential flood water is not simply moved from one community to another. The County's acknowledgement that "local neighborhood drainage systems are needed to reduce the flood risk of these areas" supports this recommendation.

Repercussions for source-of-income discrimination*.* All rental properties receiving CDBG-DR funding must agree to take Housing Choice Vouchers and not to discriminate based on source of income. Landlords that are on record as refusing tenants with vouchers or otherwise discriminating based on source of income should be reported to the appropriate County agency and be made ineligible for future CDBG or County assistance. The Land Use Restriction Agreement (LURA) placed on all rental properties receiving disaster recovery funds must set out income and rent restrictions; the affordability period; and requirements that rental projects must accept Housing Choice Vouchers for all units, not just the affordable units.

Again, thank you for the opportunity to provide comments to the County's draft Local Action Plan. We look forward to continuing to collaborate to bring about an equitable recovery.

Sincerely,

HOME Coalition Members:
Texas Organizing Project
Workers Defense Project
Texas Gulf Coast Area Labor Federation
Texas Appleseed
Texas Environmental Justice Advocacy Services
Service Employees International Union Texas Plumbers Local Union 68
Texas Building and Construction Trades Council
Houston Gulf Coast Building and Construction Trades Council
Laborers International Union of North America, LIUNA Local 350 and the Southwest Laborers

District Council
International Brotherhood of Electrical Workers, Local 716 International Union of Painters and Allied Trades, District Council 88 West Street Recovery
FIEL Houston
Faith in Texas
Air Alliance
Sierra Club Houston
Coalition of Community Organizations
S.A.F.E.
Diversity Communities
Living Hope Wheelchair Association
Action CDC

County Response: We thank the HOME Coalition for their comments.

- Harris County has prioritized the serving of low- to Moderate-income households and communities in both its housing and non-housing/infrastructure programs. A minimum of 70 percent of all CDBG-DR funding will be used to benefit this population, this has been set by the Federal Register for these funds. Currently, the county is expanding the information in the Harris County Supplemental Action Plan's Housing Impact and will include the information in the Harris County Needs Assessment. The county will continue to expand data for vulnerable populations, including disabled, LMI, and homeless populations.
- The county will investigate job creation opportunities under the CDBG-DR program and work with Federal, State and local partners. It is expected that the county will establish a robust Section 3 program under its CDBG-DR program to ensure jobs are made available to low-income persons, and Section 3 businesses in construction projects that receive funding from Harris County's CDBG-DR allocation.
- It should be noted that the county is participating in the State run Economic Development program.
- The county agrees and has made the public services mentioned (legal, counseling/case management and navigation) a part of its plan. We hope to work with area non-profits and Harris County CSD Social Services program on this effort.
- The Harris County CDBG-DR Residential Buyout program prioritizes LMI communities for buyout efforts as seen in the Harris County Residential Buyout Guidelines.
- As program guidelines are developed for the housing programs, such as rehabilitation, reconstruction and new construction, the county welcomes the input of local support groups. In the case of the recently approved Buyout guidelines, Harris County hosted meetings with housing providers, advocates, legal service providers, and fair housing organizations to assist in the development of the guidelines.

- The county does plan to provide funding suitable under its Buyout program (buyout and incentives) to ensure each client has the resources they are eligible to receive under the Federal requirements of CDBG-DR to assist them to find affordable, quality replacement housing in a reduced flood risk area. Demolition costs will not be calculated in the homeowners assistance award.
- Housing program clients will have the assistance of quality case workers and housing navigators to assist them to navigate the CDBG-DR recovery system. We understand that some populations may need additional help to understanding the programs, preparing paperwork, and applying for assistance. Programs will have language translation services available to all who require.
- Harris County has and will accept alternative forms of ownership and will work with local legal services to assist with title clearance as needed.
- The county will investigate the incorporation of mobility programs with the Texas GLO.
- The county does not plan use pre-storm home value to determine award amount in its repair program. The award amount is based on the scope of work to repair or reconstruct the damaged home.
- It is the county intention to provide housing programs in partnership with local homeless providers and the Coalition for the Homeless to those displaced and made homeless or those in eminent danger of homelessness due to Hurricane Harvey. As stated in the county's action plan, the last Point in Time Count by the Coalition reported an increase in street homeless due to Harvey.
- Mold inspection will be a part of the county's housing repair programs.
- The county's Affordable Housing Standards for construction of housing includes requires for Energy Star and IECC. The standards also promote LEED standards in housing construction.
- The county will investigate the "Increase Theft of Services" cited by the HOME Coalition.
- Currently, the county is allowed to provide one year of insurance coverage, however the county will investigate with the GLO additional years of coverage.
- The county will review local infrastructure proposals based on several factors including their impact on community recovery. The county expects to invest planning funding on planning studies that investigate: substandard infrastructure and solutions, need for affordable housing and citing and drainage needs.
- The county does and will continue to require funded rental projects under the CDBG-DR program to agree to take Housing Choice Vouchers and not to discriminate based on source of income. The county plans to work with local Housing Authorities and non-profit developers in its rental-housing program.

Commenter Name: Mark Smith

Organization: SBP, Inc USA

Date Commented: July 10, 2018

Comment Received via email:

Good Afternoon,

Please see the attached comments on the Harris County Harvey CDBG-DR Action Plan Draft. These comments have been compiled by Mark Smith and Reese May who are employees of SBP, Inc, a national nonprofit disaster recovery organization that is currently assisting Harris County residents. We would be more than happy to discuss our thoughts and feedback with Harris County officials at any time.

Please also see the summary of our comments below.

Positive Feedback

1. We applaud Harris County's prioritization of home repairs for Harvey survivors still living in FEMA/GLO provided temporary housing.

2. We are glad to see reimbursement as a pathway. At a minimum, it ensures that clients are not punished/denied CDBGDR assistance simply for having begun work themselves.

3. The buyout program is a great way to reduce long-term risk exposure for clients and/or communities who cannot afford to conduct mitigation activities on their own. Additionally, we applaud that LMI client's whose homes have repeatedly flooded will have the option to purchase new homes in low-risk areas.

Areas of Concern:

#1: Data sources, and completeness

In any recovery, data drives decisions. As we read the action plan, there are a few concerns about the data sources and their accuracy. We understand the county is compiling needs assessments for its housing programs and we want to point out the following concern for consideration. Harris County has found that FEMA IA data under-represents the needs of seniors citizens. This leads us to believe that other populations may be underrepresented as well. Can the county work with the insurance industry and/or others to assist with satellite, flyover, and claims data to get a more current and accurate picture of need?

#2 Housing Program

After a natural disaster, the longer people go without stable and safe housing the more likely they are to reach their breaking point at which families and lives are irreparably damaged. Given the limited federal resources for home repairs and reconstruction assistance and that additional funds have been allocated to Texas for mitigation, which can include infrastructure activities, we ask Harris County to increase the allocation of funds to the housing programs.

#3: Reimbursement

1. How will reimbursement pathway work for homeowners who have repairs in progress when the Harris County program launches? Will clients need to halt construction while they complete their application for the program? Will they have to change to program approved contractors?

2. What is the environmental clearance procedure/threshold that will be accepted/required by the County for homeowners in the reimbursement pathway?

3. What was the calculation methodology used to determine the max reimbursement award of $50,000?

Clear communication and predictability surrounding reimbursement will be incredibly important to survivors who would like to begin repairs or who have already begun repairing their homes but may need assistance from the county to complete their recovery.

We appreciate your time and efforts in developing a plan to expedite the recovery of Harris County and look forward to working with the county moving forward.

Sincerely,

Mark

Mark Smith
Advisory Services Manager
www.SBPUSA.org
@SBPUSA

County Response: We thank SBP, Inc for their comments.

- Currently, Harris County is expanding the data presented in the Harris County Supplemental Action Plan's Housing Impact and will include the information in the Harris County Needs Assessment.
- The data provided in the action plan shows an unmet need for housing and infrastructure funding. The county will be prioritizing projects that not only improve drainage to mitigate future storm events but will also provide funding to assist in the repair of critical infrastructure in our neighborhoods damaged by Hurricane Harvey.
- Regarding the reimbursement process, the county is awaiting more information and guidance from the Texas GLO and will be developing program guidelines over the coming months. The maximum reimbursement amount of $50,000 was determined by the Texas GLO in their State Action Plan.

Commenter Name: Cortney Morris

Organization: Resident of City of Houston

Date Commented: July 10, 2018

Comment Received via email:

My Name is Cortney Morris, a homeowner in the Kashmere Gardens area. I have experienced having to move family members due to a buyout when the first phase started at Hunting Bayou. Those family members were over the age of eighty (80) and have since passed away. It is sad that we had to relocate them from a home they had resided in for over fifty (50) years and nearly ten (10) years later, the improvements to the bayou still have not been completed.

I recently attended an "open House" the County held at the Kashmere Gardens Multi Service Center in June. My understanding of the bond is to release more funds into the Houston Area to help with flood improvements. My concern with the bond and other funds that are released is that they be distributed to areas and citizens with the most need. According to County Commissioner Rodney Ellis, often money is distributed based on the value of homes and their replacement cost versus bayou expansion or other infrastructure needs. It seems as though areas such as Greenspoint, Kashmere Gardens, South Park and others that are often low income or culturally diverse are used as the face of flooding despair to increase giving and need based funds. Once funds are made available, more often than not, the homogenous areas such as Meyerland or Upper Kirby see road and drainage improvements. Even when it comes to assistance from FEMA, oftentimes needs assessments are based on whether home owners have flood insurance.

A family friend who lives on our street, Minden, was affected like many of us during Harvey. She had over four feet of water in her home. She DID NOT have flood insurance because when it was time to renew she had to choose between medication for her husband or paying the insurance premium on a fixed income. She chose the former. She just moved back in to her house at the end of April with help from church members, family, and friends. Her husband died two weeks later. The stress of flooding, living elsewhere, the cleanup process and draining their life savings yet again to restore their home has been debilitating. Her husband wanted to hold on to get back into his house, which he did, but he didn't get to enjoy it long. Flood insurance in this area is nearly $3000 a year and must be paid in full at the time of renewal. Homes in Brazoria County are required to have flood insurance and those premiums run less than $1000/year. I understand that HUD guidelines have requirements for flood insurance, but people in my community should not be penalized for not being able to afford insurance. I ask that home rehabilitation projects include preventive measures like elevation, so in the future, if a family must choose between high cost medication or flood insurance they will still be protected.

Please remember the faces that you've seen on TV and know that we are still struggling. Many people still are not back in their homes and recovery is long. Limited incomes greatly restrict

reconstruction efforts. We've got to stop expecting nature to conform to our development and instead start accepting that we must conform to the area itself. We are the BAYOU CITY and living in a neighborhood that backs up to a bayou should not limit funds availability. No one should have to be forced out of their home due to city planning that established neighborhoods in flood plains.

Most Homes in Kashmere Gardens are on pier and beams, not foundations, so providing assistance in elevating these homes could be more affordable and effective than other repairs. I plead with you, help those most in need financially, mentally, and physically. Stop using the face of the needy and their housing circumstances to tug at purse strings just to empty its contents into more financially viable neighborhoods.

Thank you for taking time to read my comments and please do not forget Kashmere Gardens, seniors, and people on fixed incomes who can't always afford insurance, and who are still rebuilding.

County Response: We thank C. Morris a resident of the city of Houston for their comments. Although the neighborhoods mentioned in this comment are located in the city of Houston, the county acknowledges that all communities affected by Hurricane Harvey should equally have access to recovery resources. Due to cost benefit ratios, some federal funding may be more focus outside low-income areas. In the case of CDBG-DR funding, 70 percent of funding must benefit low- to moderate-income households and or communities. CDBG-DR funding requires the county to perform a duplication of benefits test, collecting information of other repair funding such as flood insurance, but attempts not penalize poor families who could not afford insurance. Those assisted with county CDBG-DR funding (rehabilitation/reconstruction program) may be eligible for flood insurance coverage funding for one year (based on GLO guidance). The County's home rehabilitation programs will evaluate or reconstruct homes that are below the based flood evaluation requirement to reduce future flood risk. Buyout programs under the CDBG-DR programs have been established for areas that have a severe flood risk for residents and emergency first responders. Both of these programs have program specialists and case workers to assist residents to navigate the CDBG-DR system.

Commenter Name: K. Prickett

Organization: Resident in Katy, Texas area

Date Commented: July 10, 2018

Comment Received via email:

Good Morning!

Our home flooded in both the Tax Day Flood & Harvey

We were given some funding from FEMA, I don't know if we qualify for any additional funding through this Harris County Publishes Action Plan for spending 1.1 Billion in HUD Money Slated for Harvey Recovery?

Please let me know how I would need to proceed if so.

Thank You,
K. Prickett

County Response: Resident referred to county case worker (Housing & Community Resource Center) for case review and service navigation.

Commenter Name: Jonathan Krantz and Bryan Howard

Organization: U.S. Green Building Council Texas Chapter

Date Commented: July 10, 2018

Comment Received via email:

See next page for letter.

USGBC
2101 L STREET, NW
SUITE 500
WASHINGTON DC 20037
202 828-7422
USGBC.ORG

FOUNDERS
David Gottfried
Michael Italiano
S. Richard Fedrizzi

July 10, 2018

Harris County Community Services Department
8410 Lantern Point Drive
Houston, Texas 77054

Attn: Planning and Development,

Thank you for the opportunity to provide comment on the Draft Supplemental Action Plan for the 2017 Community Development Block Grant – Disaster Recovery (CDBG-DR) Funds (Round 1). On behalf of the U.S. Green Building Council (USGBC), our more than 12,500 member companies, and strong Texas community of members and credential holders, we contact you to recommend that Harris County include Leadership in Energy and Environmental Design (LEED) green building certification as an option for meeting quality construction standards requirements for CDBG-DR funding.

USGBC and LEED in Harris County and Texas[1]

USGBC is a nonprofit organization committed to transforming the way all buildings and communities are designed, built and operated to enable a sustainable, resilient, and prosperous environment that improves the quality of life for all. Representing the full range of the building sector, including builders, product manufacturers, professional firms, and real estate, over 450 Texas organizations are USGBC members, and there are nearly 12,000 individuals in Texas holding a LEED professional credential.

Our flagship green building system, LEED, has been embraced by the Texas market. Indeed, Harris County has recognized the value of LEED certification by giving preference to projects who peruse certification in affordable housing standards[2] to achieve high-performing and durable buildings and homes. In fact, Texas is one of the top states for LEED for Homes with over 18,000 certified units,[3] and a 2017 study by the University of Texas Austin found that LEED-certified homes showed an 8 percent boost in value.[4] LEED also supports the state-wide economy, contributing an estimated $21.39 billion to the Texas GDP and helping to create or sustain an estimated 244,000 jobs from 2015-2018.[5] Texans know the value of achieving LEED status for their projects.

Recommendation for Harris County Action Plan

USGBC applauds the work of the Harris County in outlining a detailed plan for restoration that identifies resilience – informed by post-disaster risk assessment – as a top priority.

In order to ensure 2018 CDBG-DR funding is used effectively to rebuild in ways that help mitigate future major weather events, USGBC recommends that LEED certification be included among

[1] For more information on USGBC's work in Texas, see USGBC Texas Chapter.
[2] Harris County Affordable Housing Standards: Project Standards, Design Criteria and Underwriting Guidelines Harris County Community Services Department Revised January 2017, pg 14.
[3] See state market briefs for LEED Homes and LEED in Motion: Residential.
[4] The study looked at homes sold in the Austin-Round Rock area from 2008-2016.
[5] 2015 Green Building Economic Impact Study, Booz Allen Hamilton. See State Infographics.

options for green building certification in the local action plan , providing this choice to the market and to project teams. Including LEED as an option will help the county achieve more resilient housing that supports residents' quality of life through improved human health, greater disposable income, and an overall safer living environment.[6]

Inclusion of LEED builds on the General Land Office (GLO) minimum compliance standards for CDBG-DR. As you know, ENERGY STAR and LEED work together to empower property developers, owners, and occupants to increase projects' energy efficiency and reduce power load requirements, thus enhancing opportunities for resilience. For example, LEED for Homes uses ENERGY STAR for Homes as a core performance standard, while LEED systems for mid-rise and high-rise existing residential buildings incorporate ENERGY STAR certification as a compliance option. While ENERGY STAR is an effective path to improvement in energy performance, LEED represents a more comprehensive approach to overall sustainability, durability, and resilience.

Additionally, LEED can guide rebuilding projects to optimize community value from quality affordable housing. For example, incorporating communal green space such as parks, gardens, corridors, and roofs adds value to both building occupants and the greater public. Moreover, as our built environment unequivocally impacts human health, green building practices utilize materials and smart design known to promote wellness and decrease rates of asthma as a priority in housing developments.[7]

We stand ready to assist Harris County in implementing its CDBG-DR program regulations, to help provide high-performing, resilient housing to reduce risks of future destruction and disruption to Harris County. If you have any questions, please contact us at (214) 293-2996 jonathan@usgbctexas.org or bhoward@usgbc.org (202) 640-2344.

Sincerely,

Jonathan Kraatz
Executive Director
U.S. Green Building Council Texas Chapter

Bryan Howard
Legislative Director
U.S. Green Building Council

[6] See USGBC Policy Brief, "Green for All: Healthy and Efficient Affordable Housing."
[7] For example, a Washington, D.C. study of green certified low income housing renovations (including LEED) identified significant health benefits to residents. According to the study, self-reported general health in adults significantly

improved from 59% to 67%; allergen dust loadings showed large and statistically significant reductions and were sustained at one year. The study also reported energy and water cost savings of 16% and 54%, respectively. Jacobs et al, Health and housing outcomes from green renovation of low-income housing in Washington, D.C., C.J Environ Health. 2014 Mar;76(7):8-16.

County Response: We thank the U.S. Green Building Council for its comment. As noted in the comment, Harris County values green building, specifically Energy Star and LEED for its construction projects. Energy Star is a requirement in our HCCSD Housing Standards for construction. The county will continue to use these approaches and will consult as needed with green building experts and research to further enhance our recovery projects.

14.3. Appendix H: Public Comment – City of Houston (Amendment 1 Only)

For Amendment 1, the City of Houston published its draft local action plan on Thursday, June 7, 2018 and accepted public comments through Sunday, June 24, 2018. The City published a press release, social media posts, and a public notice in the *Houston Chronicle* and several other community newspapers announcing the availability of the plan online at HCDD's website and in hard copy at the Houston Public Library and at HCDD's office. The following is a list of those that submitted public comment

Name		Individual, County, City or Organization
Last	**First**	
Boston-Perez	Laura	Texas Organizing Project
Brents	Tom	Garden Villas Community Association
Burroughs	Roberta	
De Hoyos	Janie	Individual
De Leon	Gina	Harvey Partners Network
Egge	Rosalinda	Individual
Fisher	Bill	Sonoma Housing Advisors
Gage	Brian	Houston Housing Authority (HHA)
Henneberger	John	Texas Housers (Texas Low Income Housing Information Service)
		Houston Housing Collaborative
Hunter	Veralisa	Individual
J	Rick	Individual
Jackmon	Amira	Individual
Khalil	Hany	Texas Gulf Coast Area Labor Federation, AFL-CIO
Lawler	Mary	Avenue
Legette	Sasha	Houston Organizing Movement for Equity (HOME)
Miles	Borris	State Senator
Murphy	Jim	State Representatives District 133
Sequra	Maribel	Individual
Shields	Vincent	Individual
Smith	Mark	Individual
Vruqqink	Matthew	Ojala Holding, LLC
Timm	Amanda	LISC Houston
Thibaudeau	Eva	Coalition for the Homeless
Zini	Christina	Individual

Name		Individual, County, City or Organization
Last	**First**	
		The Metropolitan Organization (TMO)

The following is a summary of the comments received as well as the response.

Comment Received: While the Homebuyer Assistance Program benefits families, policies should ensure that the benefit goes to families and not to subsidize any inflated interest rates allowing lenders to recapture funds intended to go to build the family's financial stability.

Staff Response: Your comments will be considered as program guidelines are developed for the Homebuyer Assistance Program.

Comment Received: The City should incorporate the following into the local action plan: 1) Texas Houser's Hurricane Survivor Recovery, Rights Principles and Initiatives, 2) an updated methodology to determine unmet needs, 3) reallocate funds from the local infrastructure program and Economic Revitalization Program. 4) clear rental affordability requirements for each income category that are based on the income group's proportional shares of households with unmet needs, 5) adoption of an outreach plan prior to program implementation, 6) funding for housing assistance activities to remedy title and property tax issues, 7) the Homeowner Opportunity Program, 8) provision of payment for buyout activities above current fair market value and use incentive payments, 9) more information about elevation costs and priorities, 10) review and update resiliency multiplier, 11) incorporation of data to analyze protected classes, 12) additions about fair housing, 13) targets for assistance to LMI households for the Buyout Program, 14) prioritization of flood control in LMI neighborhoods, 15) target rental housing for income categories based on unmet need to serve extremely low-income renters and prioritize developments in high opportunity areas, 16) add information about the City's public website to ensure transparency.

Staff Response: HCDD followed the methodology provided by the GLO for the unmet needs assessment including the resiliency multiplier in the local action plan and is in the process of analyzing additional data for the in-depth needs assessment. The in-depth needs assessment will supplement information provided in the local action plan and include data about protected classes, as feasible. This information will be used in the program design. Priorities for affordability will be included in program guidelines, and your prioritization for extremely low-income and very low-income rental will be considered in guideline development. Information about the Hurricane Ike Homeowner Opportunity program and buyout payment specifications will also be considered in program development. As program guidelines are developed, an outreach plan will be developed to ensure programs are made available to all eligible applicants. There is no current funding allocated to a local infrastructure program and infrastructure projects are not prioritized in the local action plan. The Economic Revitalization Program will help to provide jobs and support small businesses to complement the housing programs. Funding has been allocated to public service activities, which may include housing services to assist remedying property title and tax issues. HCDD will continue to build upon and expand its community engagement efforts in the long-term

disaster recovery process, which will include transparency and accountability to gain public trust. HCDD's website, along with other communication mediums, will be utilized to inform the public about program guidelines, program requirements, application processes, and other information, as appropriate.

Comment Received: Continue the City's robust public engagement efforts that have already begun. Incorporate a comprehensive approach to revitalization of affected neighborhoods, including updating and strengthening neighborhood preservation and neighborhood protection policies. Economic revitalization efforts should also include deferred payment loans to small businesses affected by Harvey and job training for youth. Barriers to affordable homeownership and renting safe housing should be addressed through best practices.

Staff Response: The City will continue to partner with community organizations and neighborhood groups to build on community engagement efforts already underway. As program guidelines are developed, the City will focus on ways in which CDBG-DR investment can influence neighborhood revitalization and strengthen neighborhood preservation. The City will consider recommendations made about the Economic Revitalization Program as the program is designed and intends to undertake a holistic approach to recovery that leverages public service activities, such as job training and preparation for homeownership, to help remove barriers to safe housing and expand homeownership options.

Comment Received: Can the City analyze additional data to get a better picture of need and accurately depict unmet need? Clarification is needed regarding the reimbursement program about timing, environmental clearance, and the award calculation method.

Staff Response: The City is in the process of developing an in-depth needs assessment to supplement data provided in the local action plan. This assessment will include additional data to better define and expand upon the characteristics of unmet need in Houston. The reimbursement option of the Homeowner Assistance Program will include homeowners that have completed partial or full repairs on their homes before applying to the program. The repairs must comply with program specific environmental review requirements. The maximum award amounts for reimbursement are set by the Homeowner Assistance Program, unless otherwise specified in the program guidelines.

Comment Received: A local organization providing financial, strategic and technical assistance to build inclusive communities made the following recommendations: 1) continue robust outreach and community engagement efforts, 2) include development of nonprofit capacity in all recovery programs, 3) commit to full transparency and accountability, 4) publish results from community engagement, 5) align goals with other affordable housing and community development initiatives already underway in the city, 6) integrate resiliency planning and design in the action plan and recovery programs, 7) leverage all resources to holistically revitalize affected neighborhoods, 8) clarify Section 3 and MBE/WBE participation, 9) connect job training and workforce development to CDBG-DR funded construction investments.

Staff Response: HCDD will strive to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. HCDD will make a summary of community engagement from May and June 2018 available online. HCDD partners with and depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for capacity building. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives, as appropriate, to create a holistic neighborhood revitalization approach to CDBG-DR investments and to integrate resiliency design and construction best practices. As guidelines for the Economic Development Program are developed and Requests for Proposals are issued, effort will be made to clarify Section 3 and MBE/WBE requirements. In this program, HCDD will also strive to link workforce development and job training programs with the construction and rehabilitation programs, as appropriate.

Comment Received: A collective of people and organizations working to promote affordable housing made the following recommendations: 1) continue robust outreach and community engagement efforts, 2) include development of nonprofit capacity in all recovery programs, 3) commit to full transparency and accountability, and 4) align goals with other initiatives already underway,

Staff Response: HCDD will continue to build upon and expand its community engagement efforts in the long-term disaster recovery process and will include transparency and accountability in its community outreach to gain public trust. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives already underway in the city, as appropriate. HCDD depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for their capacity building.

Comment Received: The commenter made the following recommendations 1) use an equity-based approach to recovery efforts to ensure low-income families qualify for mitigation and buyout programs, 2) ensure quality disaster case management for individualized recovery, 3) commit to transparency and accountability in the recovery process, and 4) improve data and technology to inform solutions.

Staff Response: HCDD will prioritize LMI families and ensure outreach to and funding for families in all low-income categories. HCDD agrees that case management is a component to help individuals with personalized assistance and is in the selection process to hire a case management firm to supplement HCDD's current staff. HCDD is also building upon and expanding its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. HCDD will strive to use the best available data for program design and may consider investing in data systems and technology solutions to create efficiencies in the recovery process.

Comment Received: A coalition of organizations supporting equity recommended to: 1) prioritize LMI families, 2) allocate funds proportionally by household income in LMI categories, 3) create family-sustaining jobs, 4) ensure public service programs match needs, 5) extend rental affordability, 5) make buyouts fair for families, 6) prioritize intentional and ongoing community engagement, 7) Ensure recovery system is navigable, 8) promote

environmentally-friendly standards, 9) ensure proper oversight and quality control of construction, 10) offset the burden of insurance, and 11) minimize source of income discrimination.

Staff Response: HCDD will prioritize LMI families and ensure outreach to and funding for families in all low-income categories. HCDD looks forward to partnering with other agencies to provide sustainable jobs and workforce development programs for low-income persons. HCDD will continue to build upon existing relationships to expand community engagement through the process of developing guidelines and program implementation. As the guidelines for housing programs are developed, staff will consider these program specific recommendations.

Comment Received: A group of community development practitioners and groups engaging in disaster recovery recommended to: 1) continue expanding outreach and community engagement efforts, 2) align action plan goals with other initiatives underway, 3) use an equity-based approach to recovery efforts to ensure low-income families qualify for programs, 4) utilize quality case managements, and 5) commit to transparency and accountability in the recovery process.

Staff Response: HCDD staff will continue to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives, as appropriate, and to provide safe housing for homeowners to prevent future flooding. HCDD agrees that case management is a component to help individuals with personalized assistance and is currently in the selection process to hire a case management firm to supplement current staff.

Comment Received: I need assistance repairing my home.

Staff Response: Please contact HCDD staff representing the Home Repair Program. You may call 832.394.6200, send an email to homerepair@houstontx.gov, or learn more information about the programs online at http://www.houstontx.gov/housing/home_repair_programs.html.

Comment Received: Why is the City not addressing infrastructure issues with FEMA payout? What community input is needed and when? Is the repair and replace program being developed? Does Texas Organizing Project have a contract with the City of Houston?

Staff Response: The City has applied for FEMA PA funding for repairs needed to various City owned infrastructure and will apply for additional FEMA PA as applications are developed. HUD is expected to announce additional CDBG-DR in Fall 2018 to address infrastructure and mitigation needs. Additional community input about CDBG-DR funds that address housing needs will be solicited in July through September 2018 as program guidelines are developed. The Homeowner Assistance Program, as summarized in the local action plan, has repair and reconstruction components that will be available to single family homeowners. The City does not have a contract with the Texas Organizing Project regarding this local action plan.

Comment Received: The City should utilize the affordable housing plan that was developed by Midtown Redevelopment Authority and the Center for Civic and Public Policy Improvement that would assist the City to quickly spend the disaster recovery funding on shovel ready projects.

Staff Response: HCDD looks forward to working with the Midtown Redevelopment Authority to implement affordable housing strategies.

Comment Received: The commenter made recommendations to strategically advance equity when utilizing disaster recovery funds in Houston. General recommendations include to: 1) build intentional and ongoing community involvement into the local action plan, 2) prioritize low-income families, 3) use FEMA and other data to assess need, 4) utilize sound methodology to determine loss and unmet needs, 5) include impacted undocumented Houston families, 6) ensure accessibility to city programs, and 7) invest in future-looking planning and community response. Recommendations about housing programs included: 1) calculate buyout assistance based on comparable relocation costs, 2) provide other forms of assistance to homeowners based on need, 3) make single family homes and multifamily units greener and affordable, and 4) improve infrastructure to protect neighborhoods in harm's way. Recommendations about job creation include: 1) create a Disaster Recovery Workforce Development Program, 2) create Community Workforce Hiring Program, 3) develop Disaster Recovery Contractor Policy, and 4) increase theft of service enforcement. Finally, environmental justice recommendations were made to ensure resiliency and minimize health consequences.

Staff Response: HCDD will continue to build on relationships with community organizations to expand the community engagement supporting the long-term disaster recovery process. Programs will follow regulations and guidelines provided by HUD and the GLO and will prioritize assistance for LMI persons. HCDD is working to utilize various data sources and create new datasets to assess need, determine unmet need, and guide programs. The program specific recommendations about the residential buyout assistance calculation, affordability targets for rental housing, assistance to homeowners, the Homeowner Opportunity Program, building green housing, mitigating infrastructure to protect residents from future flooding, creating a workforce development and hiring program, and ensuring environmental justice will be considered as HCDD develops recovery program guidelines in the next few months.

Comment Received: The City should recognize the needs of and provide grants to residents who received Substantial Damage letters and must now rebuild their home at a higher elevation, as mandated by City code.

Staff Response: HCDD will consider your priority recommendation when developing the guidelines for the Homeowner Assistance Program.

Comment Received: Will there be a cap on the maximum award for the Multifamily Rental Program. Is there a target allocation between acquisition, rehab, and new construction? Is there a funding cap? Is there an affordability term and is the loan forgivable? Is it 18 months to complete project and is that reasonable period of time for completion?

Staff Response: As stated in the local action plan, the Multifamily Rental Program has a maximum award amount of $40,000,000 per development with a minimum affordability period of 20 years. The effective date of the contract is the date the agreement with the borrower is executed and closed. This is often followed by a 30-day mobilization period until work begins on the project. Currently under development, the program guidelines will contain specific information regarding any additional funding caps, targeted amounts for acquisition, rehabilitation, and new construction, and other priorities.

Comment Received: There is a need for neighborhood preservation and protecting communities, such as those in the Third and Fourth Ward, against gentrification and blight. Funds should be used for non-traditionally designed homes that allow the community to remain interconnected and help preserve neighborhood character.

Staff Response: In the recovery process, HCDD will strive to provide affordable housing that best fits the community's need without displacement. HCDD is interested in working with local organizations and developers to provide various affordable housing options. HCDD will offer a Small Rental Program to rehabilitate and develop rental housing between 1 and 7 units. In addition, HCDD continues to promote the creation of a community land trust to ensure long-term affordability of housing in Houston.

Comment Received: To prevent and end homelessness, use disaster recovery funds for: 1) supportive services paired with rental subsidies, 2) rental subsidies for short- and long-term assistance, 3) acquisition of multifamily unit acquisition to dedicate for persons experiencing homelessness, 4) acquisition of small properties to accommodate homeless persons in need of additional mental health and health assistance, and 5) rehabilitating existing apartments for use by persons exiting homelessness.

Staff Response: With disaster recovery funding, HCDD intends to fund public service activities that stabilize persons and families at risk of homelessness and prepare them for permanent housing solutions. These activities may include, but are not limited to, homeless prevention services, housing counseling, legal counseling, job training, and mental and general health services. More targeted services, such as subsistence payments, rental housing subsidies, security deposits and other services that assist in the housing and/or rehousing of the homeless or those at risk of becoming homeless may also be undertaken. The Multifamily Rental Program and Small Rental Program will help assist families impacted by Harvey, including those exiting homelessness, to access safe, affordable rental housing. HCDD will consider your input regarding dedicated multifamily units as permanent housing options for the homeless and creating accommodations for persons with substance abuse disorders as the guidelines for the housing programs are developed in the next few months.

Comment Received: The Homeowner Assistance Program should include set-aside funds for those that receive and accept the substantial damage letters from the City of Houston. Housing assistance should be provided to non-LMI homeowners. Non-housing programs should have limited funding.

Staff Response: HCDD will consider your priority recommendation for homeowners who receive substantial damage letters when developing the guidelines for the Homeowner Assistance Program. HCDD continues to analyze data and will develop an in-depth needs assessment, which will help HCDD target programs. The City plans to utilize this CDBG-DR round of funding only for housing and housing related activities.

Comment Received: The $40 million maximum award amount per development for the Multifamily Rental Program is too high and should be lowered. CDBG-DR funding should be leveraged to more than $1 billion in new or rehabilitation of affordable housing

Staff Response: HCDD is committed to preserving and expanding the supply of affordable rental housing in Houston by leveraging its funding. The maximum award amount allows HCDD flexibility in project selection. HCDD will strive to leverage this funding to achieve the greatest housing benefit. HCDD will develop guidelines for housing programs which will contain more detailed information about requirements and priorities, including leveraging. These comments will be taken under consideration as HCDD develops these guidelines.

Comment Received: CDBG-DR funds should be used to advance equity in Houston's labor market. Recommendations include: 1) hire local residents impacted by Harvey for jobs created in the rebuilding process, 2) support construction training programs in Harvey impacted neighborhoods, including pre-apprenticeship programs, 3) contractors should demonstrate how they will enhance the community by providing safe jobs, fair compensation, and quality work, and 4) fund a workforce development program consistent to the scope of the damage to area homes.

Staff Response: As described in the local action plan, public service activities and the Economic Revitalization Program will include workforce development activities, job training, and assistance to microenterprises and small businesses, such as those that provide housing construction services. HCDD looks forward to working with local organizations to advance equity and resilience through workforce development in the long-term recovery process.

Comment Received: All affected districts in the City should be eligible for and benefit from CDBG-DR. Rehabilitation and reconstruction activities should be available to all, regardless of income, especially semi-retired/retired/persons with disabilities living on a fixed income that may be above LMI caps. Clarification is requested regarding ineligibility of rehabilitation for those living in the floodplain without insurance. The sites for development of new single family and multifamily homes developed with CDBG-DR should not be located in floodplains and should be infill development. The funding designated for economic revitalization and planning should be reallocated for either homeowner/rental property rehabilitation or reconstruction or used for drainage and mitigation improvements and maintenance. The City should be transparent in the use of funding and provide the public with regular updates of programs, accomplishments, and expenditures.

Staff Response: HCDD is analyzing additional data regarding unmet needs and will utilize this analysis when developing program guidelines. The commenter's preference for using funding for all communities and persons regardless of income as well as the priority of serving residents on a fixed income will be taken under consideration as guidelines are developed. HCDD works to

preserve and create quality housing and will consider these specifications and priorities for developing new housing when developing program guidelines. The maintenance of infrastructure is not eligible to be funded with CDBG, however constructing new or improved infrastructure is eligible. Additional CDBG-DR funding is expected to be announced in Fall 2018, which can be used for mitigation, such as infrastructure improvements. HCDD will continue to improve its public engagement process, which will include informing the public about program implementation and expenditures. Federal requirements specify that CDBG-DR funding may not be used to rehabilitate or reconstruct a home that has the following three conditions:1) has a household where income is higher than 120 percent of the AMI, 2) the property is in a floodplain, and 3) the property owner did not maintain flood insurance on the property.

Comment Received: There has not been enough information given to help homeowners make decisions about demolishing, selling, or rebuilding their homes. Do the City and County engage with each other to allow homeowners to understand their options? The commenter did not like the meetings held.

Staff Response: As of the summer of 2018, CDBG-DR funding has not been provided to the City of Houston yet, and currently HCDD is developing guidelines for its housing programs utilizing data from storm impacts, resources made available to the City, and public input. The City works closely with Harris County Flood Control District, which does have targeted buyout areas and infrastructure improvements located in the city limits of Houston. We appreciate your participation in the public engagement meetings and welcome feedback on how to improve these meetings and better inform the public throughout the recovery process.

Comment Received: The following recommendations were made: 1) continue expanding outreach and community engagement efforts, 2) align goals with affordable housing and community development initiatives already underway in the city, 3) develop nonprofit capacity in all recovery programs, 4) provide quality case management, which is essential to recovery and investment is needed to ensure an individual's personal route to full recovery, 5) improve data and technology to inform solutions, and 6) commit to full transparency and accountability.

Staff Response: HCDD strives to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. As program guidelines are developed, efforts will be made to align programs to other initiatives, as appropriate. HCDD depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for capacity building. HCDD agrees that case management is an important component to help individuals with personalized assistance and is in the selection process to hire a case management firm to supplement current staff. HCDD will research systems to store information that will serve the recovery process.

Comment Received: Edits should be made to tables in the local action plan reflecting updated information describing the Houston Housing Authority. Also, the total need reflected in Table 13 is much less than the actual need due to demolition and reconstruction costs not taken into account. This should be reflected in this table. An amount in the Multifamily

Rental Housing Program should be set-aside to develop units for extremely low-income households.

Staff Response: Requested edits were made. As the City analyzes additional data and creates program guidelines, staff will consider your priority to fund rental housing for extremely low-income households.