

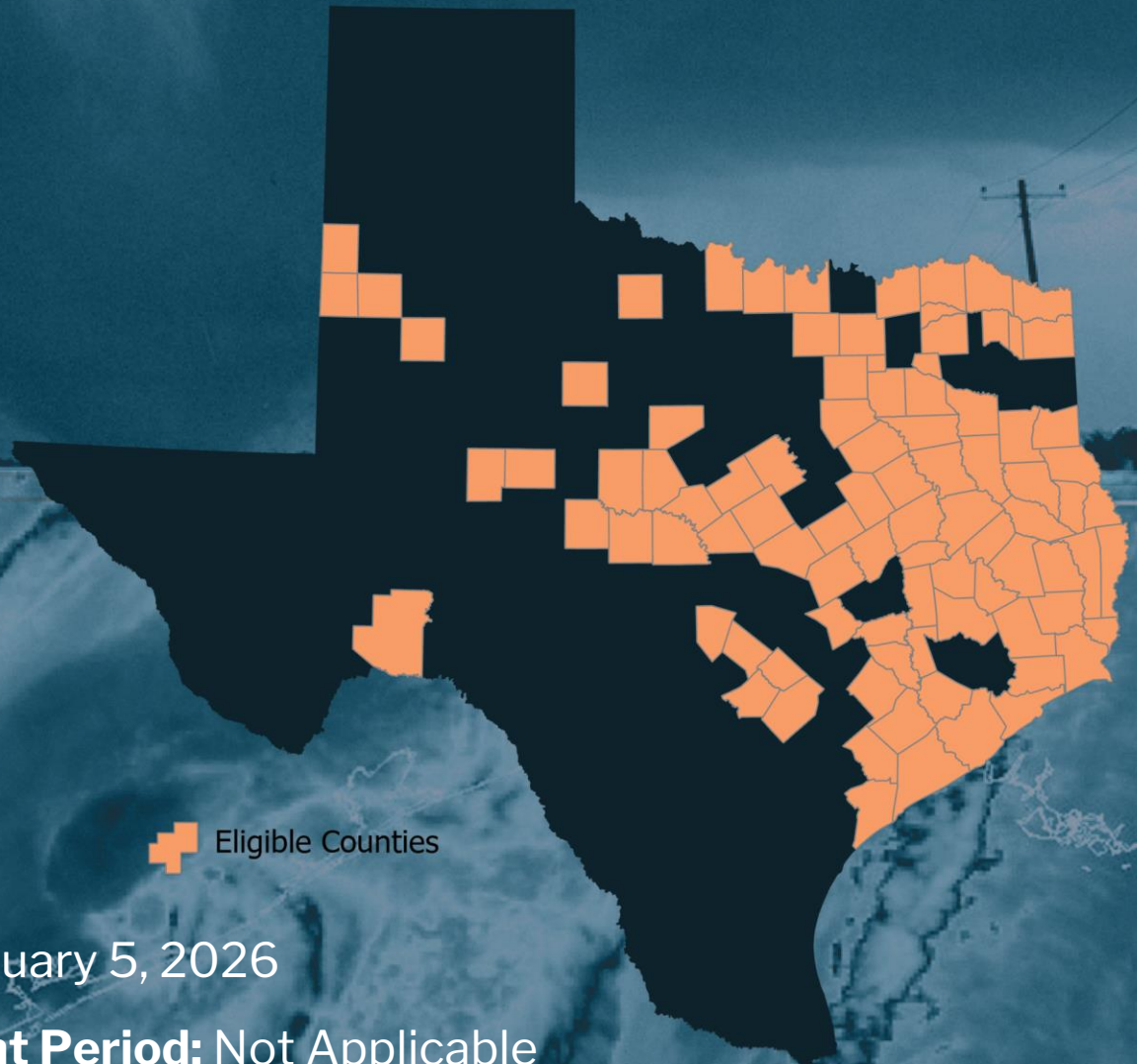


TEXAS GENERAL LAND OFFICE

2024 Disasters

COMMISSIONER DAWN BUCKINGHAM, M.D.

Action Plan Amendment 1



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1. Versions and Amendments

1.1. Summary of Changes

This document constitutes the First Amendment (Nonsubstantial) to the State of Texas 2024 Disasters Action Plan, approved by HUD on August 21, 2025.

The following changes to the Action Plan are made in this Amendment:

- 7. Use of Funds
 - 7.5 Homeowner Assistance Program (HAP)
 - Language clarifying mitigation measures added
 - 7.6 Homeowner Reimbursement Program (HRP)
 - Language clarifying mitigation measures added
 - 7.7 Affordable Rental Program (ARP)
 - Language clarifying maximum amount of assistance and mitigation measures added
 - 7.8 Local Communities Program (LCP)
 - Language clarifying maximum amount of assistance and mitigation measures added

1.2. Budget Changes

Program	Previous Allocation	Change	Revised Allocation
Homeowner Assistance Program (HAP)	\$244,100,000.00	-	\$244,100,000.00
Homeowner Reimbursement Program (HRP)	\$43,100,000.00	-	\$43,100,000.00
Affordable Rental Program (ARP)	\$88,100,000.00	-	\$88,100,000.00
Local Communities Program (LCP)	\$97,033,950.00	-	\$97,033,950.00
State Project Delivery	\$27,784,350.00	-	\$27,784,350.00
State Planning	\$27,784,350.00	-	\$27,784,350.00
State Administration	\$27,784,350.00	-	\$27,784,350.00

1.3. Change Log

Iteration	Summary	Approval or Acknowledgement Date
Initial	<p><u>Pre-Public Comment:</u> The initial 2024 Disasters Action plan included the creation of Homeowner Assistance Program (HAP), Homeowner Reimbursement Program (HRP), Affordable Rental Program (ARP) and Local Communities Program (LCP).</p> <p><u>Post-Public Comment</u></p> <ul style="list-style-type: none"> • Additional language was added to Chapter 4 clarifying that the City of Houston is not eligible to receive funding in any programs. • Program mitigation set asides rounded to the nearest thousand. • Homeowner Assistance Program (HAP) <ul style="list-style-type: none"> ○ Public service added as an eligible activity. ○ Clarified home ownership and primary residence eligibility criteria to state that the home must have been owner-occupied at the time of the disaster and at the time of application; in addition, the home must have served as a primary residence at the time of the disaster. ○ Set maximum income to 200% of the area median income. • Affordable Rental Program (ARP) <ul style="list-style-type: none"> ○ Minimum project size increased to 8 units due to public comment. ○ Criteria data sources clarified. ○ Foreclosure regulations language removed. • Local Communities Program (LCP) <ul style="list-style-type: none"> ○ Planning added as an eligible activity due to public comment. 	August 21, 2025
APA1 (N/S)	<ul style="list-style-type: none"> • Language clarified regarding mitigation measures in the Homeowner Assistance, Affordable Rental, and Local Communities Programs. • Language clarified regarding maximum assistance in the Affordable Rental and Local Communities Programs. 	

2. Executive Summary

Through the Allocation Announcement Notice published in Federal Register notice 90 FR 4759 (January 16, 2025), the U.S. Department of Housing and Urban Development (HUD) announced that the state of Texas will receive \$555,687,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following the Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781) and Hurricane Beryl (DR-4798), known as the 2024 Disasters. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158, December 21, 2024) and written according to guidelines set forth by HUD in Federal Register notice 90 FR 1754 (January 8, 2025, as amended per Memorandum 2025-02 published on March 10, 2025 and Memorandum 2025-03 published on March 31, 2025), hereafter referred to as the updated Universal Notice, as amended. The Texas General Land Office (GLO) has been designated by the Governor to administer CDBG-DR funds on behalf of the state of Texas. CDBG-DR funding is designed to address remaining unmet need after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet needs in the state of Texas. Harris County and the City of Houston received direct allocations from HUD of \$67,326,000 and \$314,645,000 in the Allocation Announcement Notice. Harris County and the City of Houston will create and administer their own action plans to support recovery in their jurisdictions and will not be included in list of eligible Most Impacted and Distressed (MID) areas in this Action Plan.

Table 2-1: CDBG-DR Allocation Overview

Allocation Overview	Allocation
CDBG-DR Allocation	\$483,206,000
CDBG-DR Mitigation Set Aside	\$72,481,000
Total Allocation	\$555,687,000
Source: 90 FR 4759 (January 16, 2025)	

The 2024 Disasters CDBG-DR Action Plan is broken out into seven chapters: Disaster-Specific Overview, Most Impacted and Distressed Areas, Unmet Needs Assessment, Mitigation Needs Assessment, Use of Funds, General Information, and Appendices.

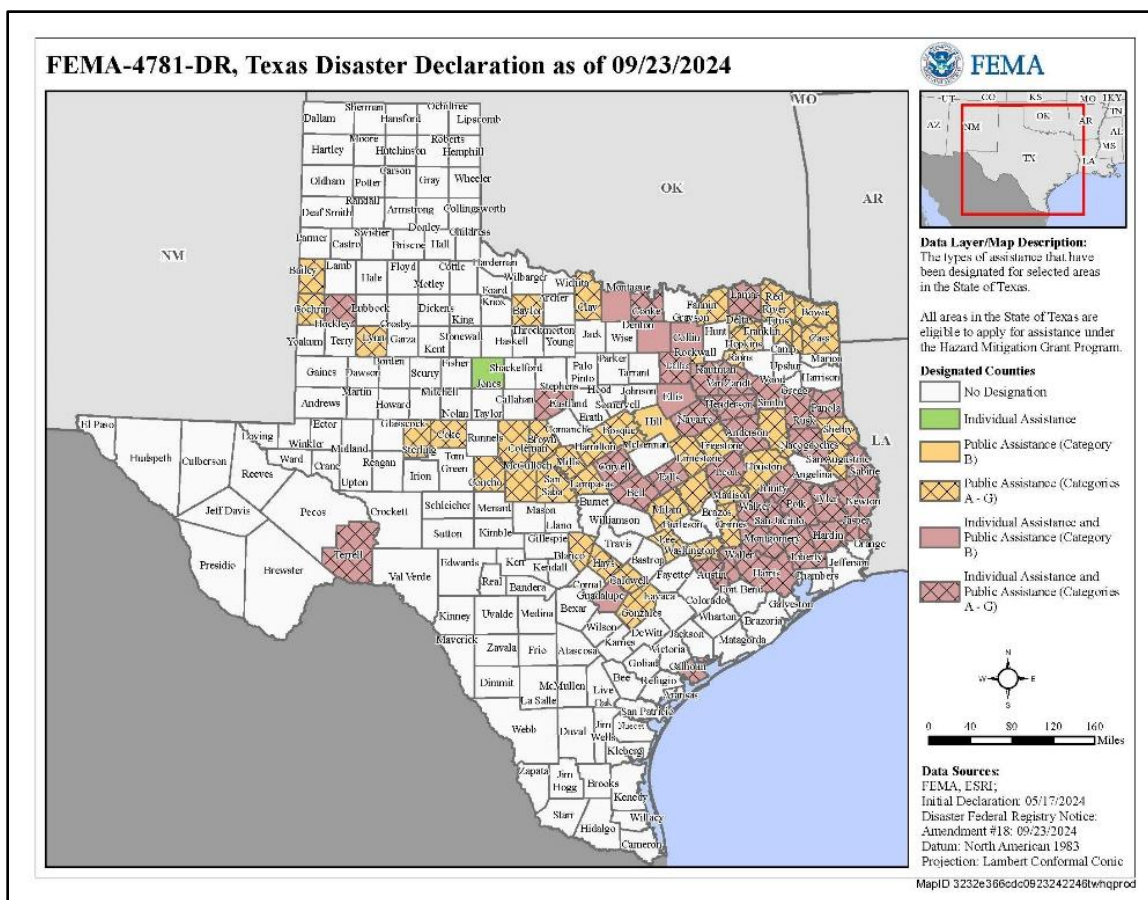
The Action Plan outlines the programs that the GLO will administer: the Homeowner Assistance Program (HAP), the Homeowner Reimbursement Program (HRP), the Affordable Rental Program (ARP), and the Local Communities Program (LCP). The housing programs (HAP, HRP, and ARP) will restore homeowner and multifamily rental housing in the HUD MID counties. The LCP will allocate funds for units of general local government and federally recognized Indian Tribes in both the HUD and Secondary MID counties.

3. Disaster-Specific Overviews

3.1. 2024 Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781)

From April 26 to June 5, 2024, the state of Texas was impacted by widespread rain, intense winds, tornadoes, and flooding, with the most significant impacts focused on the eastern portion of the state. Eighty-one counties received a Presidential disaster declaration for severe storms, straight-line winds, tornadoes, and flooding, excluding counties who exclusively received FEMA Public Assistance (PA) for categories A and B. Six counties received only Individual Assistance (IA), 42 counties received PA, and 33 counties received both IA and PA, according to FEMA.¹

Figure 3-1: 2024 Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding Designated Areas Map, DR-4781

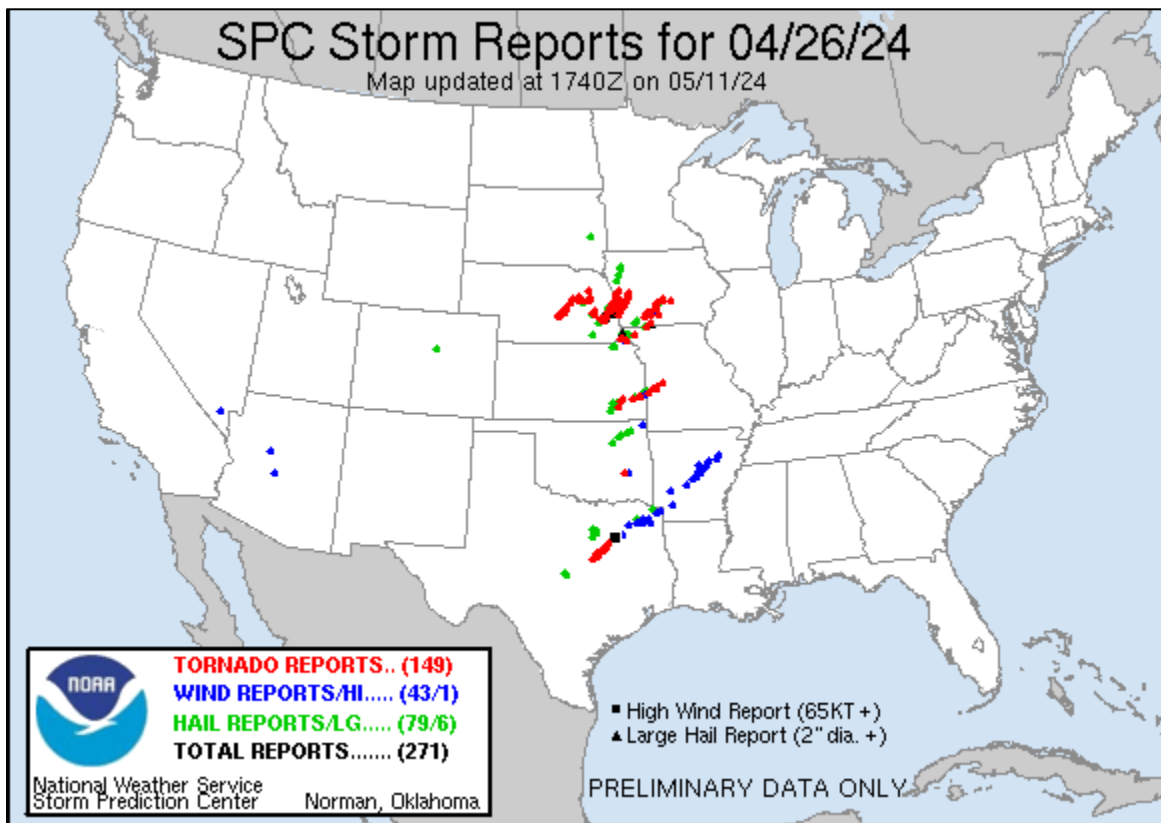


Source: FEMA GIS Maps, https://gis.fema.gov/maps/dec_4781.pdf

¹ FEMA, "Texas - Severe Storms, Straight-line Winds, Tornadoes, and Flooding FEMA-4781-DR," 2024, <https://www.fema.gov/disaster/4781>.

During the early morning hours of April 26, 2024, a line of strong severe thunderstorms moved through West Texas and the Texas Panhandle.² The National Weather Service warned many regions throughout the state of Texas to prepare for “historic releases from lake and reservoir operations.”³

Figure 3-2: Preliminary Storm Reports for 4/26/2024 from the Storm Prediction Center



On April 27 and 28, 2024, Dallas, Henderson, and Smith counties in Texas were impacted by a severe weather system that brought heavy rainfall, thunderstorms, and the threat of tornadoes. In Dallas County, the National Weather Service issued a tornado watch lasting through the early hours of April 28, and although no tornadoes were confirmed, the area faced risks of hail and localized flooding.⁴ In Smith County, the storms led to significant flash flooding, causing multiple road closures and prompting emergency response efforts.⁵ Henderson County was placed under a tornado warning as storms moved through the region on April 27, though reports of confirmed damage were limited.⁶

² Ibid.

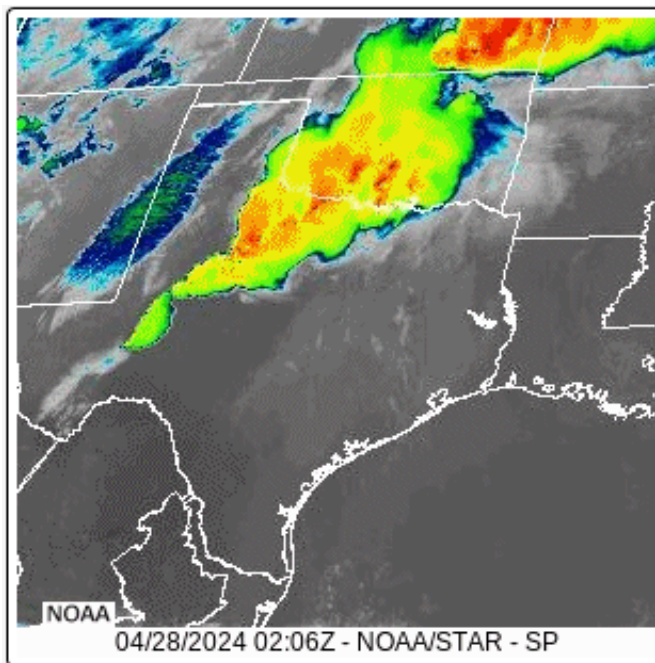
³ Governor Abbott Adds Counties To Disaster Declaration For Severe Weather, Flooding. May 2, 2024. <https://gov.texas.gov/news/post/governor-abbott-adds-counties-to-disaster-declaration-for-severe-weather-flooding>.

⁴ Dallas Morning News. “Severe Storm Chances across North Texas Go through Weekend with Threats of Hail, Flooding.” Dallas Morning News, April 27, 2024. <https://www.dallasnews.com/news/weather/2024/04/27/severe-storm-chances-across-north-texas-go-through-weekend-with-threats-of-hail-flooding/>.

⁵ Ibid.

⁶ FOX 4 News. “Storms Cause Damage across North Texas.” FOX 4 News, April 26, 2024. <https://www.fox4news.com/news/dallas-weather-storms-april-26>

Figure 3-3: National Weather Service, April 27-28 Tornado and Flash Flooding

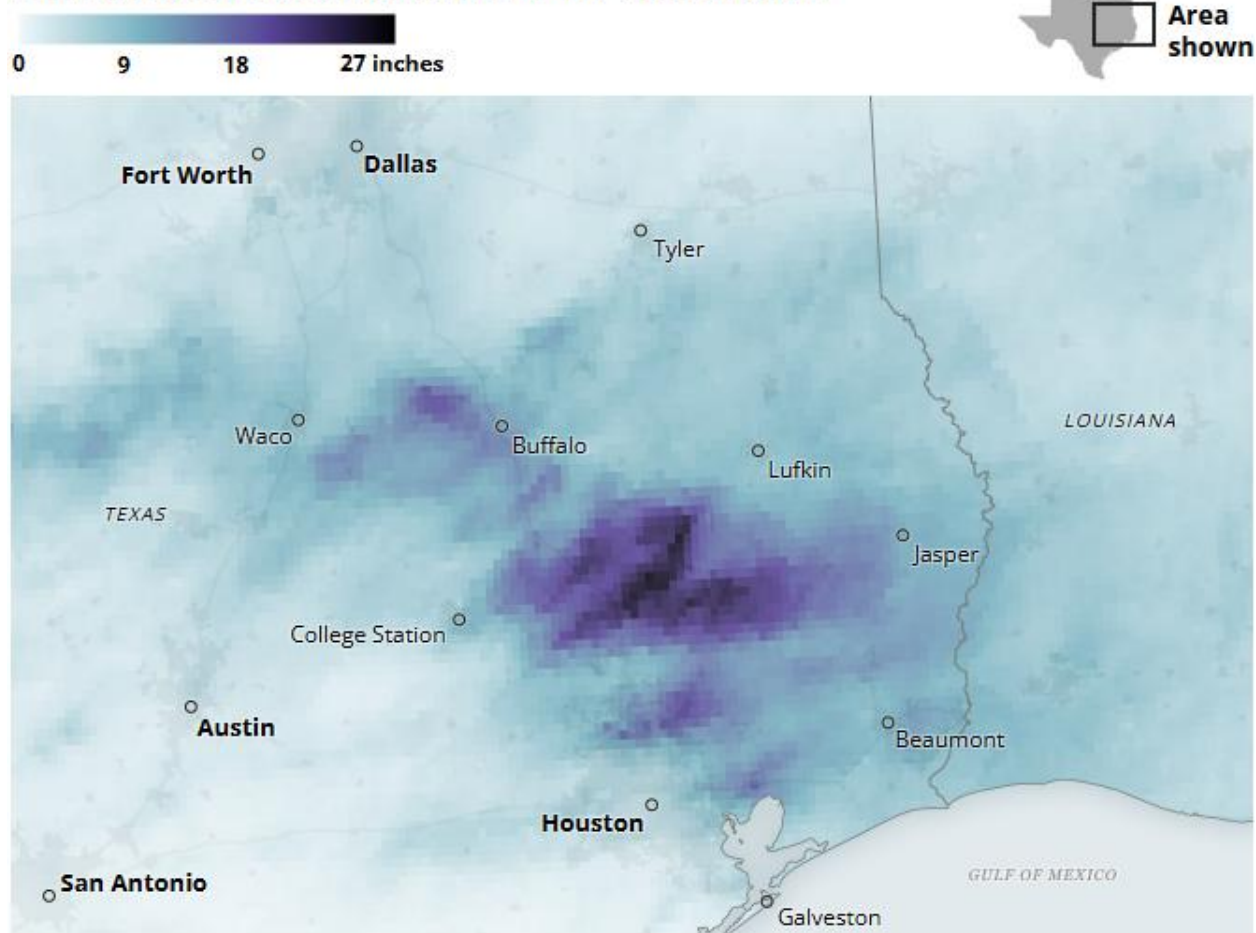


The storms in southeast Texas between April 28 and May 7, communities saw rainfall, as much as 10 inches in a day. San Jacinto, Walker, Polk, and Trinity counties received 25 inches of rain over ten days, compared to the average of 1.2 inches. Heavy rain fell along the Trinity River which was already saturated with water from the previous two months' rain, causing significant river flooding. Lake Livingston – which straddles Polk, San Jacinto, Trinity, and Walker counties – was fuller than it had been since 1995, reaching a level higher than during Hurricane Harvey.⁷

⁵ Lozano, Juan A, "Floodwaters start receding around Houston area as recovery begins following rescues and evacuations." Associated Press, May 6, 2024, <https://apnews.com/article/houston-texas-flooding-severe-weather-117b0f63e9bd53be31ee34e11547da21>.

Figure 3-4: Severe Widespread Rainfall in Southeast Texas

Total rainfall from 7 a.m. on April 28 to 7 a.m. on May 7



Source: The Texas Tribune, See the Scope of Flooding in East Texas, 2024

On May 9, a severe storm hit the cities of San Marcos (Hays County), Dripping Springs (Hays County), and Johnson City (Blanco County) with strong winds and hail over five inches in diameter, causing Hays County to declare an emergency.⁸ On May 28, the National Weather Service issued a warning for DVD-sized hail (5 inches in diameter) for Hockley County, just east of Lubbock, the first warning for hail that large on record.⁹

While the impacts of the disasters were felt across the state, eastern Texas was particularly hard hit, recording nearly 25 inches of rain over the span of nine days, more than 20 times higher than the average rainfall amount for the region during that same period in previous years. These conditions, as well as their unprecedented length, caused severe flooding due to the excessive

⁸ Maya Fawaz, Andy Jechow, "Hays County declares disaster after strong wind, large hail hits San Marcos." *The Texas Tribune*, May 10, 2024, <https://www.kut.org/energy-environment/2024-05-10/hail-severe-storm-hays-county-texas-hill-country-weather>.

⁹ Cappucci, Matthew, "The hail in Texas was so big Tuesday that it required a new description." *The Washington Post*, May 29, 2024, <https://www.washingtonpost.com/weather/2024/05/29/texas-hail-dvd-size-record-nwvs/>.

water levels in the bodies of water of the affected counties.¹⁰ The water overflow of Lake Livingston measured approximately 220,000-acre feet, the highest regional amount recorded in nearly two decades. These conditions also brought a stream of heavy winds and a record breaking 92 tornados.¹¹ The National Weather Service documented 566 reports of severe wind for the same disaster period, nearly double the amount from the same span the previous year.

In Montgomery County, approximately 10 individuals were injured due to an EF3 tornado with winds up to 140 mph.

The storms also caused extensive damage to homes, businesses, and infrastructure. High rain totals and wind speeds within Liberty, Montgomery, Polk, San Jacinto, Trinity, and Walker counties led to street flooding, nearly 700 homes being destroyed or in need of major repair and causing over 1,800 people to be impacted from these conditions.¹² In Montgomery County alone, over 300 structures were affected, with 31 completely destroyed and 47 sustaining major damage.¹³

3.2. 2024 Hurricane Beryl (DR-4798)

Texas was impacted by Hurricane Beryl from July 5 to July 9, 2024, causing widespread damage and power outages, resulting in a Presidential disaster declaration.¹⁴ Thirty counties (counties only receiving FEMA PA categories A & B are excluded from this count) received a disaster declaration with three counties receiving only Individual Assistance (IA), 18 counties receiving both Individual Assistance (IA) and Public Assistance (PA) and nine counties receiving only PA.

10 Schumacher, Yuriko, "See the scope of flooding in East Texas," East Texas Floods, May 7, 2024, *The Texas Tribune*, <https://www.texastribune.org/2024/05/07/east-texas-flooding-2024-graphics/>.

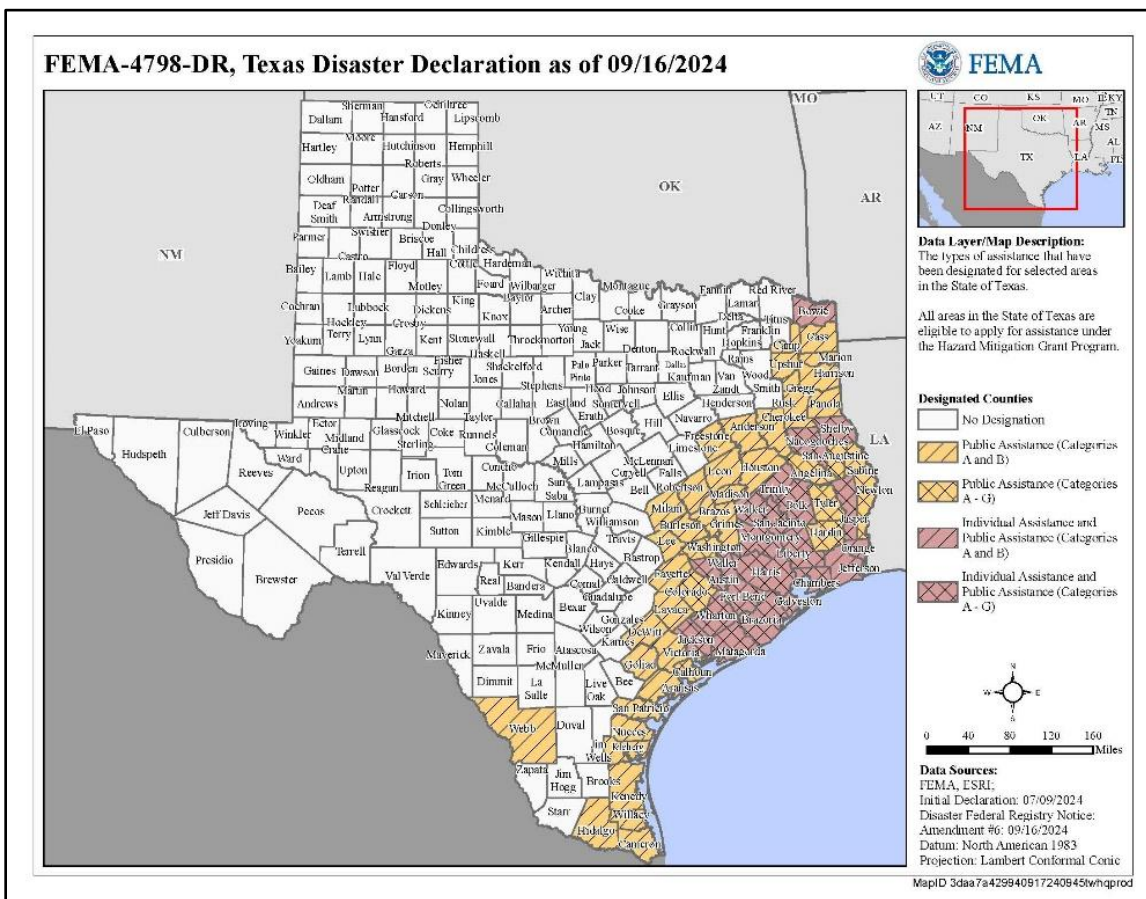
11 National Weather Service Austin/San Antonio, TX. June 6, 2024, "Drought Information Statement for South Central Texas," https://www.weather.gov/media/ewx/DGT/DGT_FWX_06062024.pdf.

12 FEMA, "Preliminary Damage Assessment Report, Texas - Severe Storms, Straight-line Winds, Tornadoes, and Flooding FEMA-4781-DR," 2004.

13 Houston Chronicle, Montgomery County judge signs disaster declaration after damaging storms, December 30, 2024, <https://www.chron.com/news/houston-texas/article/montgomery-county-disaster-declaration-20007412.php>.

14 FEMA, "Preliminary Damage Assessment Report, Texas Hurricane Beryl DR-4798-TX," 2024, <https://www.fema.gov/disaster/4798>.

Figure 3-5: Hurricane Beryl Designated Areas Map, DR-4798



Source: FEMA GIS Maps, https://gis.fema.gov/maps/dec_4798.pdf

Hurricane Beryl initially developed as a tropical cyclone in the Atlantic Ocean then strengthened to a tropical storm on June 28. On June 29, the storm intensified, forming a hurricane which was the earliest Category 5 hurricane on record in the Atlantic basin. Hurricane Beryl made landfall in Grenada as a Category 4 hurricane on July 1, and then on the Yucatán Peninsula on July 5 as a Category 2 hurricane. In the early morning hours of July 8, Hurricane Beryl made landfall near Matagorda, Texas as a Category 1 hurricane with maximum sustained winds of 80 mph¹⁵ bringing a damaging storm surge of six to ten feet at landfall.¹⁶ Hurricane Beryl continued its path over Texas, moving northeast reaching northwest Houston, still at hurricane strength, on July 8. Hurricane Beryl continued moving east and weakened into a tropical depression as it crossed the Texas border into Louisiana in the late hours of July 8 near the city of Shreveport.

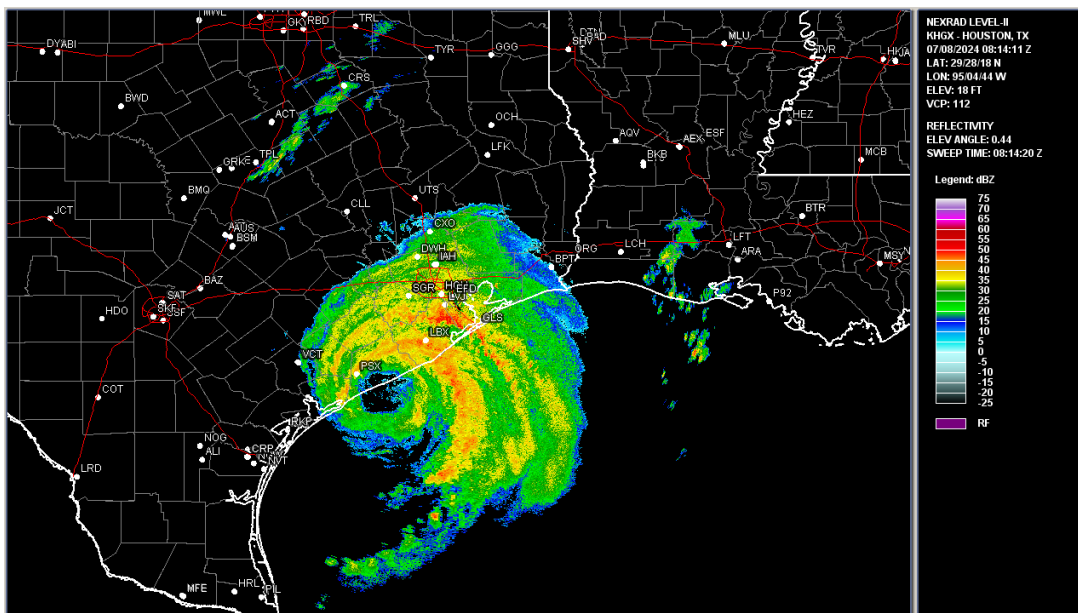
Sustained winds of 40 to 50 mph with gusts of 50 to 70 mph were experienced across southeast Texas along with moderate storm surge flooding in Jefferson County, with tides two to three feet higher than normal. In Jefferson County, Highway 87 had water and debris covering the road from

15 National Weather Service, "Hurricane Beryl," 2024, https://www.nhc.noaa.gov/data/tcr/AL022024_Beryl.pdf.

16 AccuWeather, "AccuWeather's Preliminary Estimate of the Total Damage and Economic Loss from Hurricane Beryl in the United States is \$28-32 Billion," July 9, 2024, Accessed February 4, 2025, <https://corporate.accuweather.com/newsroom/severe-weather-advisories/severe-weather-advisory-july-9-2024/>.

Sabine Pass to Sea Rim State Park. One EF2 tornado with wind speeds of 86 to 110 mph was reported in the city of Jasper and injured one person.¹⁷

Figure 3-6: Hurricane Beryl Landfall Map, National Weather Service



Source: NWS, Hurricane Beryl, <https://www.weather.gov/lch/2024Beryl>

The NOAA National Centers for Environmental Information estimated the total damage from Hurricane Beryl at \$7.2 billion.¹⁸ AccuWeather estimated that the total combined damage and economic loss associated with Hurricane Beryl was between \$28 and \$32 billion. This estimate includes damages to homes and businesses, public facilities, infrastructure, thoroughfares, personal property, cars, job and wage losses, farm and crop losses, supply chain disruptions, postponed or cancelled flights, emergency management and response operations, and lingering potential health and economic effects. Millions of people were left without power in scorching summer heat. Fourteen known deaths occurred as a result of Hurricane Beryl in the United States, 11 of which were in Texas. In Texas, five people died because trees fell on them, four drowned, one died in a house fire caused by lightning, and one died in a boating incident.¹⁹

The highest rainfall totals were located primarily in the southeastern region of Texas where eight to twelve inches of rain were recorded. The total rainfall in Fort Bend County was observed at over 14 inches. The single highest official rainfall total of 14.99 inches was observed in the town of Thompsons in Fort Bend County. These conditions caused maximum storm surge inundation

¹⁷ National Weather Service, "Hurricane Beryl," 2024, https://www.nhc.noaa.gov/data/tcr/AL022024_Beryl.pdf.

¹⁸ Smith, Adam, "2024: An active year of U.S. billion-dollar weather and climate disasters," 2025, <https://www.climate.gov/news-features/blogs/beyond-data/2024-active-year-us-billion-dollar-weather-and-climate-disasters>.

¹⁹ Ibid.

levels of five to seven feet above ground level (AGL) near where Hurricane Beryl made landfall along the coast of Texas from Matagorda to Freeport.

Hurricane Beryl generated a total of 65 tornadoes, with 16 reported in Texas.²⁰ Other notable damage occurred due to Hurricane Beryl's extensive wind speeds, which occurred while the storm intensified during landfall, primarily in Brazoria, Chambers, Fort Bend, Galveston, and Matagorda counties.²¹

3.3. Overview of the Impacts of the Qualifying Disasters

The 2024 Texas Severe Storms, Straight-line Winds, Tornadoes, Flooding and Hurricane Beryl had impacts across multiple regions of Texas, with the most severe damage in the eastern portion of the state, damaging and destroying homes and infrastructure, and causing economic impacts to businesses. These effects are magnified in the western portion of the state, since those areas do not see significant storms or flooding at the same rate as other impacted counties.

²⁰ National Weather Service, Hurricane Beryl, 2024, <https://www.weather.gov/lch/2024Beryl>.

²¹ Ibid

4. Most Impacted and Distressed Areas

CDBG-DR Most Impacted and Distressed (MID) areas are the areas of the state that are eligible to benefit from recovery programs. The MID area is further broken down into HUD MID and Secondary MID areas, a factor in program eligibility. As the Unmet Needs Assessment demonstrates, while the entire MID area contains unmet needs relating to the 2024 Disasters, the HUD MID area contains significantly more housing recovery unmet needs. Because of this, the eligible geographic area for all of the housing recovery programs will exclusively be the HUD MID Areas. The Local Communities Program (LCP) will allow for applicants from both the HUD MID and Secondary MID areas. FEMA PA categories C-G are classified as permanent work, meaning that they are related to long-term disaster recovery and have remaining unmet need. Counties that exclusively had FEMA PA categories A and B damage were excluded because these are classified as emergency work (debris removal and emergency protective measures) and not associated with long-term disaster recovery.

Because the City of Houston received a direct allocation from HUD of \$314,645,000 in the Allocation Announcement Notice, they are not eligible for funding under the State of Texas 2024 Disasters CDBG-DR Action Plan.

4.1. HUD Identified MID Areas

HUD requires grantees to spend at least 80 percent of the allocation on unmet needs in HUD identified MID areas. In the Allocation Announcement Notice, HUD identified both counties and ZIP codes as MID areas for the 2024 Disasters; however, section III.D.2 of the updated Universal Notice, as amended, allows grantees to expand HUD MID areas. According to that section:

“HUD may identify an entire jurisdiction or a ZIP code as a MID area. If HUD designates a ZIP code as a MID area for the purposes of allocating funds, the grantee may expand program operations to the whole county(ies), borough(s), parish(es), municipio/ municipios, or equivalent jurisdictions that overlap with the HUD designated ZIP code. A grantee must indicate the decision to expand eligibility in its action plan.”

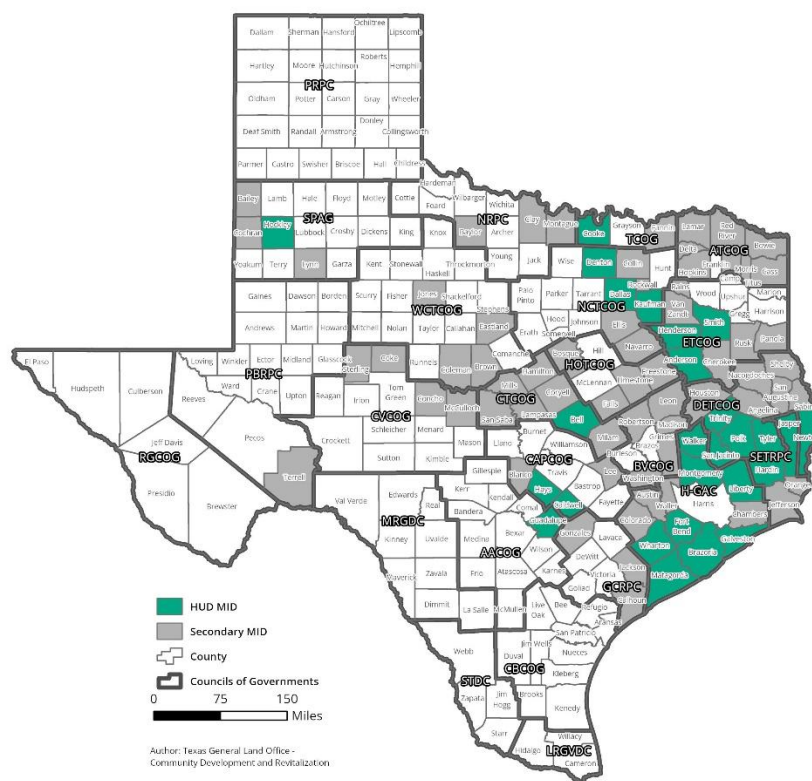
A review of areas damaged by the 2024 Disasters shows that while impacts may be focused in some ZIP codes, damage occurred throughout the county in which those ZIP codes are located. Because ZIP codes have no governmental body that can administer grant funding and their boundaries can move as new addresses are added, ZIP codes are not ideal MID designations, particularly with regards to infrastructure programs that will be administered by units of general local government or federally recognized Indian Tribes. Greater administrative efficiency can be realized in designating the entire county as HUD MID. Accordingly, the GLO has decided to utilize the allowance in section III.D.2 of the updated Universal Notice, as amended, to expand the HUD MID areas in specific instances. Any county that intersects a HUD MID ZIP code and has damage that falls under FEMA Public Assistance (PA) categories C-G or FEMA Individual Assistance is designated as entirely HUD MID.

With these additional counties added, there are a total of 27 HUD MID counties for the 2024 Disasters: Anderson, Bell, Brazoria, Caldwell, Cooke, Dallas, Denton, Fort Bend, Galveston, Guadalupe, Hardin, Hays, Henderson, Hockley, Jasper, Kaufman, Liberty, Matagorda, Montgomery, Newton, Polk, San Jacinto, Smith, Trinity, Tyler, Walker, and Wharton.

4.2. Secondary MID Areas

Up to 20 percent of the allocation may address unmet needs in the Secondary MID areas. These areas are the remaining FEMA declared eligible counties for Public Assistance Categories C-G, which constitute the permanent work categories, and Individual Assistance. As the Unmet Needs Assessment illustrates, there are significant infrastructure needs within the identified Secondary MID counties to address. These Secondary MID counties are: Angelina, Austin, Bailey, Baylor, Blanco, Bosque, Bowie, Brown, Calhoun, Cass, Chambers, Cherokee, Clay, Cochran, Coke, Coleman, Collin, Colorado, Concho, Coryell, Delta, Eastland, Ellis, Falls, Fannin, Freestone, Gonzales, Grimes, Hamilton, Hopkins, Houston, Jackson, Jefferson, Jones, Lamar, Lampasas, Lee, Leon, Limestone, Lynn, Madison, McCulloch, Milam, Mills, Montague, Morris, Nacogdoches, Navarro, Orange, Panola, Rains, Red River, Robertson, Rockwall, Rusk, Sabine, San Augustine, San Saba, Shelby, Sterling, Terrell, Titus, Van Zandt, Waller, and Washington.

Figure 4-1: 2024 Disasters CDBG-DR Eligible Counties



5. Unmet Needs Assessment

The GLO completed the following unmet needs assessment (the Assessment) to identify remaining long-term needs and priorities for CDBG-DR funding allocated as a result of the 2024 Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding and Hurricane Beryl (the 2024 Disasters). This assessment is informed by a comprehensive set of data sources covering multiple geographies and sectors and was completed according to guidelines set forth by HUD in the updated Universal Notice, as amended, and the Allocation Announcement Notice. The information presented throughout the Assessment focuses on the impacts sustained by the 92 MID counties outlined in the Most Impacted and Distressed Areas Chapter. The information for the Assessment was compiled using federal and state sources, including information from the Federal Emergency Management Agency (FEMA), the U.S. Department of Housing and Urban Development (HUD), the Texas Division of Emergency Management (TDEM), Texas Department of Housing and Community Affairs (TDHCA), the Texas A&M Real Estate Research Center, and the Small Business Administration (SBA).

The Assessment includes specific details on housing, infrastructure and economic revitalization unmet needs, focusing on the HUD and Secondary MID counties. The connection between these unmet needs and the recovery programs are discussed in the Use of Funds Chapter of this Action Plan.

5.1. Unmet Needs and Mitigation Needs Summary

The table below summarizes the unmet needs for rental housing, owner-occupied housing, infrastructure, and economic revitalization.

Table 5-1: Summary of Unmet Needs

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Rental Housing	\$371,986,557	29.39%	\$88,100,000	18.65%
Owner-Occupied Housing	\$543,607,313	42.94%	\$287,200,000	60.81%
Infrastructure	\$189,654,037	14.98%	\$97,033,950	20.54%
Economic Revitalization	\$160,592,000	12.69%		
Total	\$1,265,839,907	100.00%	\$472,333,950	100.00%

5.2. Housing Unmet Needs

5.2.1. Emergency Shelters, Interim, and Permanent Housing

Households at risk of homelessness and people experiencing homelessness are obviously affected by natural disasters. Data related to homelessness is difficult to capture in a state the size of Texas. The best data available for this analysis is the statewide dataset, which is used in this section.

Table 5-2: Point-in-Time Count - Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	12,026	3,622	12,339	27,987
Data Source(s): FY 2024 COC Dashboard Reports, HUD Exchange				

The best data available statewide is the Point-in-Time (PIT) count data for fiscal year 2024, made available on the HUD Exchange. A PIT count is an annual survey conducted to count the number of people experiencing homelessness on a single night, typically in January. This count includes individuals staying in shelters, transitional housing, and those unsheltered (e.g., sleeping on the streets or in cars). The PIT count is required by HUD and helps communities understand the scope of homelessness in order to allocate resources effectively. Continuums of Care (CoCs) also conduct PIT counts and manage data through the Homeless Management Information System (HMIS). CoCs are regional or local planning bodies responsible for coordinating services and funding to address homelessness. CoCs apply for federal funding from HUD and work with service providers, shelters, and community organizations to offer housing assistance, support services, and case management. CoCs represent metropolitan areas throughout the state and collect PIT counts at those geographies. Because the 2024 Disasters cover a significant portion of the state and county level data is unavailable, homelessness figures for the whole state were used in this assessment.

As of 2024, there were at least 27,987 people experiencing homelessness in Texas. Of those, 43 percent were in emergency shelters, 13 percent were in transitional housing, and 44 percent were unsheltered. In response to the 2024 Disasters, HUD allocated \$2.1 million in Rapid Unsheltered Survivor Housing (RUSH) funds to the state of Texas. The RUSH funds will be administered by the Texas Department of Housing and Community Affairs (TDHCA) to help address those experiencing homelessness.²²

5.2.2. Rental and Owner-Occupied Single-Family and Multifamily Housing

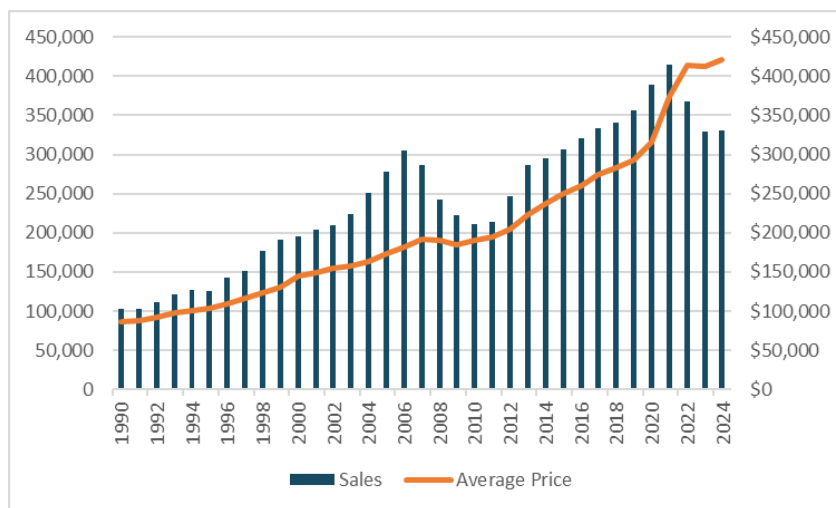
According to the Texas A&M Real Estate Research Center, the Texas housing market was strong in December of 2024, with 26,754 sales in that month alone, up 14 percent year-over-year. There was \$11.4 billion in volume sold in December of 2024, up 19 percent year-over-year.

As the chart below shows, over the past 35 years the Texas housing market has seen a steady increase in the average price of homes along with increases in sales, though sales vary more – a

²² HUD, "HUD Announces \$2.5 Million in Disaster Funding to Support Americans Impacted by Recent Hurricanes and Severe Storms," 2025, <https://www.hud.gov/news/hud-no-25-035>.

significant dip occurred during the Great Recession and after a peak in 2021 when interest rates rose significantly. Average home prices rose sharply during the COVID pandemic starting in 2020, cooled off in 2022 as interest rates rose, and are now continuing to increase again.²³

Figure 5-1: Texas Homes Sales and Average Price (1990-2024)

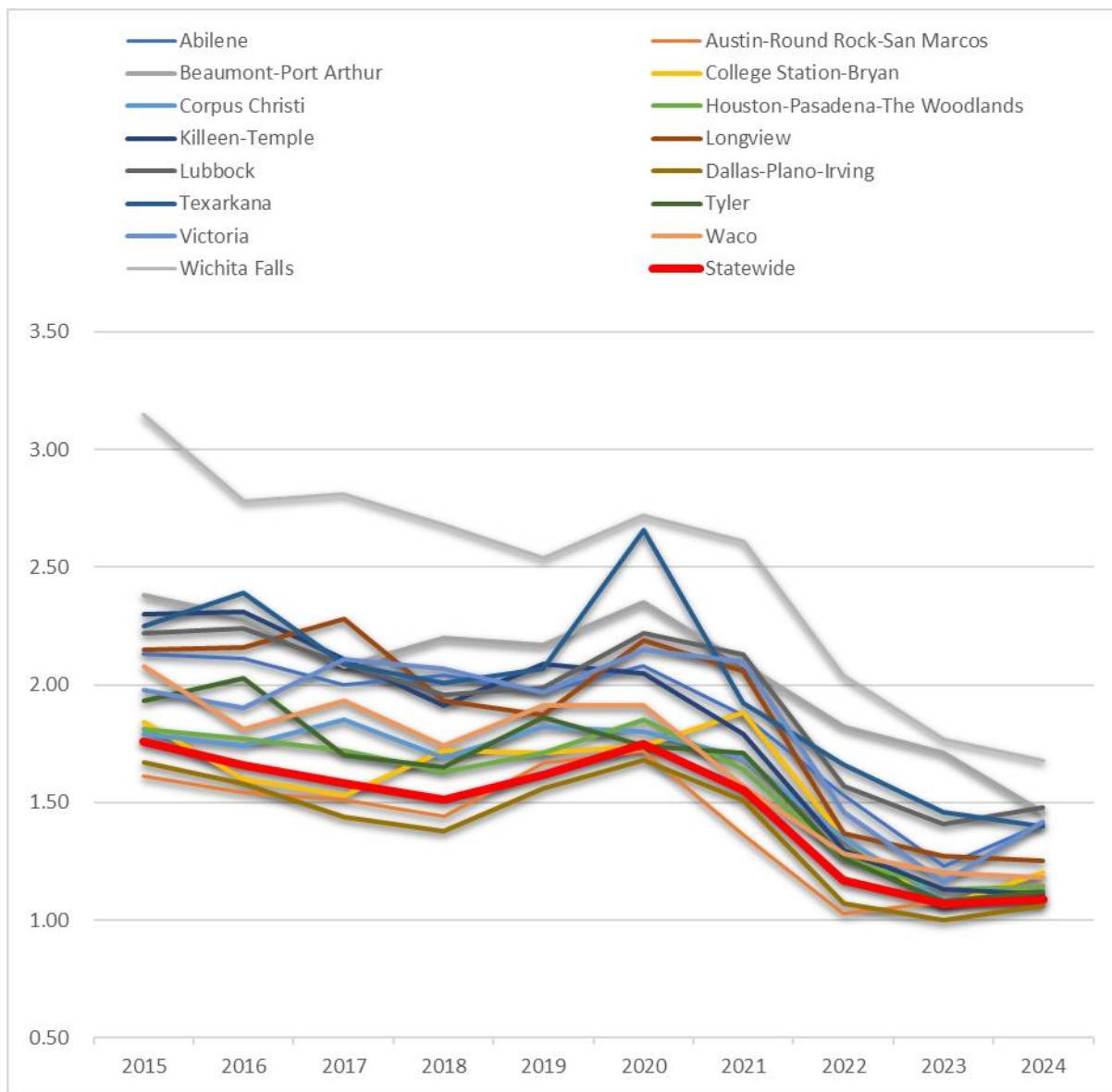


Source: Texas A&M Real Estate Research Center

Another product of the Texas A&M Real Estate Research Center, the Texas Housing Affordability Index, measures the affordability of the metropolitan statistical areas (MSAs). The index compares the median income a family makes against the income needed to purchase a median-priced home. The income required is derived from the current mortgage interest rate, the down payment, the lender’s required mortgage qualifying debt-to-income ratio, which itself compares the monthly mortgage payment to the borrower’s gross monthly income. The higher the index value, the greater the level of affordability in the region. An index value above 1.00 means that the median family income is sufficient to purchase a median-priced home. The MSAs above all intersect with MID counties and show that, while all MSAs are affordable according to the index, all regions have become far less affordable, especially after 2020.

²³ Texas A&M Real Estate Research Center "Housing Activity," 2024, <https://trerc.tamu.edu/data/housing-activity/?data-State=Texas>.

Figure 5-2: Housing Affordability Index by MSA



Source: Texas A&M Real Estate Research Center

These two charts illustrate a growing housing affordability issue across the state and in the impacted areas, which is made worse by the impact of a natural disaster. After a natural disaster, the housing stock tends to decrease (as homes experience damage or destruction), causing the cost of housing to increase, compounding the already high demand for, and rising cost of, housing in Texas. This is especially true for multifamily and duplex housing stock, which tend to recover more slowly, as evident from previous disasters.²⁴

²⁴ Hamideh, Sara, "Housing type matters for pace of recovery: Evidence from Hurricane Ike," *International Journal of Disaster Risk Reduction*, 2021, <https://www.sciencedirect.com/science/article/pii/S2212420921001151>.

To better gauge the scale of the impact of the 2024 Disasters, the GLO has compiled information to document damages for owner-occupied and rental households within the MID area. For the purposes of this analysis, the GLO used publicly available data collected through FEMA’s IA Open Data program that is current as of January 2025. Another resource for homeowners that sustained damage from the 2024 Disasters is SBA disaster recovery 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 whose property was damaged by a declared disaster can apply for an SBA low-interest loan. This data was provided by SBA in March 2025.

As the table below showing SBA Disaster Homes Loans indicates, the HUD MID counties saw a significantly larger impact on housing compared with the Secondary MID counties. Nearly ten times as many households filed for assistance with the SBA, and the total loan amount for HUD MID counties is also more than ten times higher than Secondary MID counties.

Table 5-3: SBA Disaster Home Loans

MID Designation	Total Applicants	Total Verified Loss	Total Loan Amount
HUD MID	20,250	\$ 394,473,993	\$ 107,656,319
Secondary MID	2,654	\$ 45,771,790	\$ 8,947,095
Total	22,904	\$ 440,245,783	\$ 116,603,414
Data Source(s): Small Business Administration (SBA)			

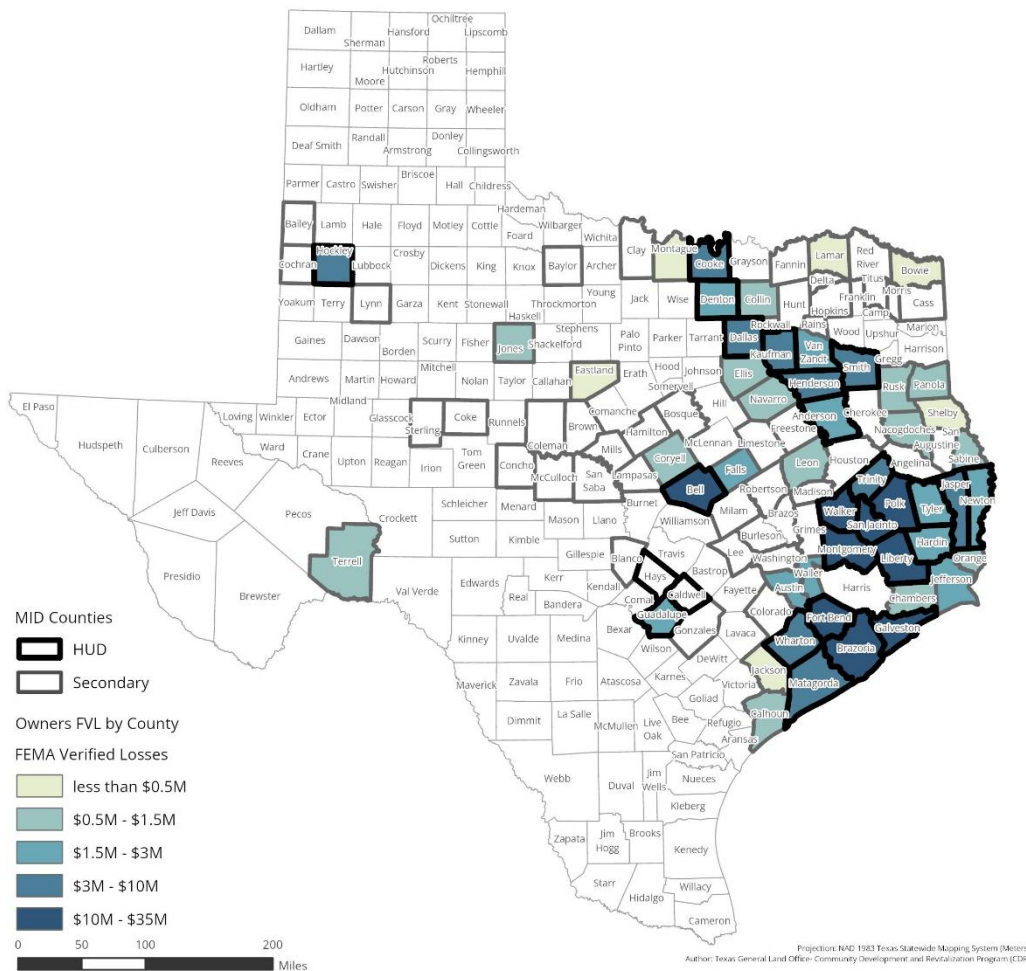
The below FEMA IA Owner-Occupied table shows a similar trend with regards to owner-occupied housing as the SBA Disaster Home Loan data for the 2024 Disasters. The HUD MID area accounts for 90 percent of those who received assistance and those with Real Property FEMA Verified Loss (RPFVL) showing that the majority of applicants for FEMA housing assistance came from HUD MID counties.

Table 5-4: FEMA IA Owner-Occupied

MID Designation	# of Applicants	# of Inspections	Applicants with FVL over \$0	Total FEMA Verified Loss
HUD MID	269,238	62,364	33,777	\$ 212,814,301
Secondary MID	23,436	7,509	3,985	\$ 23,700,112
Total	292,674	69,873	37,762	\$ 236,514,414
Data Source(s): FEMA IA				

The map below illustrates this trend geographically, with the highest FVL occurring in the HUD MID counties and generally concentrated in the eastern part of the state, the Dallas metro area, and counties just southeast of Dallas County.

Figure 5-3: FVL by Owner-Occupied



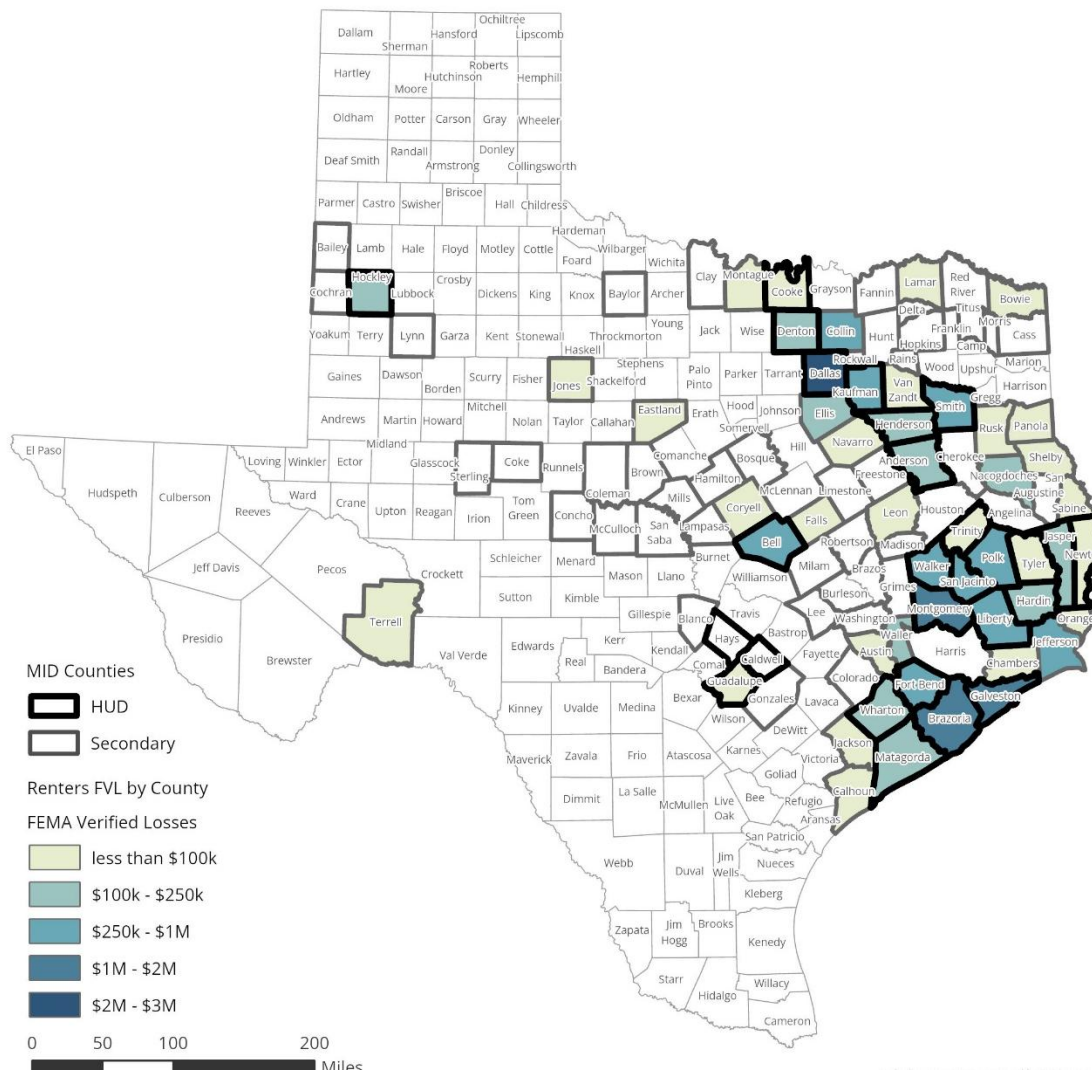
Renters also experienced storm-related impacts throughout the MID area, though to a lesser degree than owners. The below FEMA IA Renter-Occupied table illustrates renter-occupied applicants to the FEMA IA program under the 2024 Disasters. The HUD MID counties account for approximately 88 percent of the total Personal Property FEMA Verified Loss amount and 89 percent of the applicants who received assistance compared with the Secondary MID counties.

Table 5-5: FEMA IA Renter-Occupied

MID Designation	# of Applicants	# of Inspections	Applicants with FVL over \$0	Total FEMA Verified Loss
HUD MID	155,494	49,268	22,943	\$ 13,429,983
Secondary MID	24,313	7,727	2,980	\$ 1,758,885
Total	179,807	56,995	25,923	\$ 15,188,869
Data Source(s): FEMA IA				

The map below illustrates this trend geographically, with the highest FVL occurring in the HUD MID counties and generally concentrated in the eastern part of the state and the Dallas metro area.

Figure 5-4: FEMA IA FVL by Renter-Occupied



Comparing Total FEMA Verified Loss (FVL) for renter-occupied and owner-occupied applicants illustrates that owner-occupied applicants in the HUD MID counties had the highest level of damages (roughly 85 percent of all FVL). Renter-occupied applicants in the HUD MID counties account for 88 percent of renter-occupied applicants.

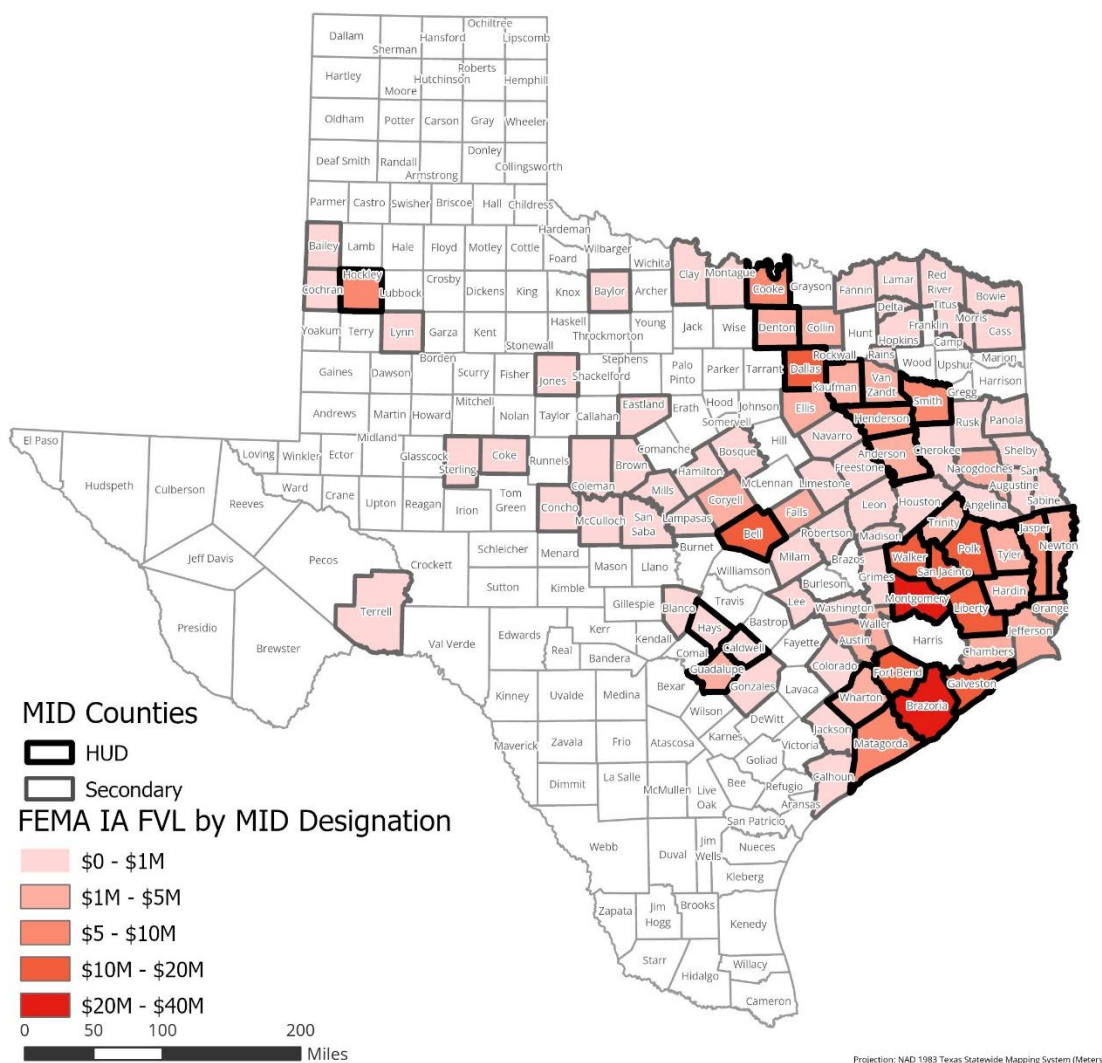
Table 5-6: Renter/Owner FVL by MID Designation

MID Designation	Renter	Owner	Total	Total Percentage
HUD MID	\$ 13,429,983	\$ 212,814,301	\$ 226,244,284	89.89%
Secondary MID	\$ 1,758,885	\$ 23,700,112	\$ 25,458,998	10.11%
Total	\$ 15,188,869	\$ 236,514,414	\$ 251,703,282	100.00%

Data Source(s): FEMA IA

The map below illustrates this trend geographically, with the highest FVL occurring in the HUD MID counties and generally concentrated in the eastern part of the state and the Dallas metro area. Hockley County, in the western part of the state, also shows a relatively higher FVL.

Figure 5-5: FEMA IA (Owner and Renter) FVL by MID Designation



The below FEMA IA Applicants (owner and renter) by Housing Type table shows the distribution of FEMA IA applications. The vast majority of applications came from single-family houses and duplexes, followed by apartments, then mobile homes.

Table 5-7: FEMA IA Applicants by Housing Type

Residence Type	Total Applicants	Percentage of Total	Owner-Occupied	Owner-Occupied %	Renter-Occupied	Renter-Occupied %
House/Duplex	305,248	64.7%	224,655	76.8%	80,593	44.9%
Apartment	65,813	13.9%	27	0.0%	65,786	36.68%
Mobile Home	52,419	11.1%	37,962	13.0%	14,457	8.1%
Other	27,940	5.9%	18,017	6.2%	9,923	5.53%
Townhouse	9,779	2.1%	4,284	1.5%	5,495	3.1%
Travel Trailer	9,403	2.0%	7,028	2.4%	2,375	1.32%
Condo	1,354	0.3%	619	0.2%	735	0.4%
Total	471,956	100%	292,592	100.0%	179,364	100.0%

Data Source(s): FEMA IA

To calculate the level of damage for owner-occupied households, HUD categorized the FEMA inspected owner units into one of five categories:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or more than one foot of flooding on the first floor.
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or six or more feet of flooding on the first floor.

Rental household damage is calculated based on personal property damage, because FEMA does not inspect rental units for real property damage. To calculate the level of damage for rental households, HUD categorized the FEMA inspected owner units into one of five categories:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or one to 3.9 feet of flooding on the first floor or determination of “Moderate” damage by the FEMA inspector.
- Major-High: \$3,500 to \$7,499 of FEMA inspected personal property damage and/or four to 5.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.

- Severe: Greater than \$7,500 of FEMA inspected personal property damage and/or determined destroyed and/or six or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

The below FEMA Damage Category table shows the distribution of impacts to homeowner and rental units for the MID counties. Minor-low and minor-high impacts were the most prevalent categories as a result of the 2024 Disasters. Across all damage categories, homeowners had greater impacts from the 2024 Disasters compared with renters, at least doubling the renters in each damage category.

Table 5-8: FEMA Damage Category

Residency Type	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Total
Owners	269,579	14,116	6,844	1,575	560	292,674
Renters	171,234	1,267	6,847	329	130	179,807
Total	440,813	15,383	13,691	1,904	690	472,481

Data Source(s): FEMA IA

In order to calculate Housing Unmet Needs, HUD applies a disaster specific multiplier based on the incident type that each FEMA IA applicant falls into. For applicants impacted by DR-4781 FEMA designated the incident type as Flood so the “Flood” multiplier was used while for applicants impacted by DR-4798 FEMA designated the incident type as Hurricane, so the “Hurricane” multiplier was used. The table below shows the breakout of FEMA IA applicants by incident type.

Table 5-9: Number of Applicants and FVL by Incident Type

Incident Type	Number of Applicants with FVL over \$0	FVL
Flood	41,217	\$ 155,359,763
Hurricane	37,293	\$ 118,468,040
Total	78,510	\$ 273,827,803

Data Source(s): FEMA IA

The table below illustrates these multipliers. For applicants living in Manufactured Housing Units (MHU), the AAN uses a separate “Mobile Homes” multiplier applied for all disaster types. According to FEMA IA data there were 52,419 applicants in MHUs and 15,062 MHUs with FVL over \$0.

Table 5-10: FEMA IA Unmet Need Multiplier by Damage Category

Disaster Type	Major-Low	Major-High	Severe
Flood	\$ 47,074	\$ 57,856	\$ 64,513
Hurricane	\$ 36,800	\$ 45,952	\$ 45,952
Mobile Homes	\$ 77,058	\$ 98,463	\$ 134,834
Data Source(s): FEMA IA			

Housing unmet needs only consider those applicants that fall into the damage categories Major-Low, Major-High, or Severe. The table below illustrates the total housing unmet need and breaks that figure down between owner-occupied and renter-occupied housing unmet need. Owner-occupied housing accounts for almost 60 percent of the calculated housing unmet need, while renter-occupied housing is slightly more than 40 percent.

Table 5-11: Category of Unmet Need by Owner-Occupied and Renter

Damage Category	Total Applicants	Total Housing Unmet Need	Owner-Occupied Count	Owner-Occupied Unmet Needs	Rental Count	Total Rental Unmet Needs
Major-Low	13,691	\$ 723,213,802	6,844	\$ 381,862,734	6,847	\$ 341,351,068
Major-High	1,904	\$ 131,233,513	1,575	\$ 111,000,485	329	\$ 20,233,028
Severe	690	\$ 61,146,555	560	\$ 50,744,094	130	\$ 10,402,461
Total	16,285	\$ 915,593,870	8,979	\$ 543,607,313	7,306	\$ 371,986,557
Data Source(s): FEMA IA						

5.2.3. Public Housing (Including HUD-Assisted Housing) and Other Affordable Housing

Public Housing Authorities (PHAs) work to provide decent and safe rental housing for eligible low-income families throughout the U.S. The GLO contacted the HUD Office of Public Housing which is responsible for PHA monitoring. HUD reported no damages to PHA units. The MID counties contain almost 15,200 units of public housing, 47 percent of which are in the HUD MID counties and 53 percent of which are in the Secondary MID counties.

The MID counties contain just over 100,000 Low Income Housing Tax Credit (LIHTC) units, 74 percent of which are in the HUD MID counties, and 26 percent of which are in the Secondary MID counties. Across the MID counties there are roughly 44,000 Housing Choice Vouchers (HCV), 71 percent of which are in the HUD MID counties and 29 percent of which are in the Secondary MID counties. According to reports from the Texas Department of Housing and Community Affairs (TDHCA), 454 LIHTC units were damaged by 2024 Disasters.

Table 5-12: Public Housing and Affordable Rental

Area	Total Housing Choice Vouchers	Total Impacted Housing Choice Vouchers	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
HUD MID Counties	31,249	-	74,778	451	7,086	-
Secondary MID Counties	12,779	-	25,977	3	8,104	-
Total	44,028	-	100,755	454	15,190	-

Data Source(s): HUD Geospatial Data Storefront, January 2025; TDHCA, April 2025

5.3. Infrastructure Unmet Needs

Public Assistance (PA) is FEMA’s largest grant program, providing funds to assist qualifying communities responding to and recovering from declared disasters or emergencies. Eligible work must be required as a result of the declared incident, be located in the eligible area, be the legal responsibility of the applicant, and be undertaken at a reasonable cost. In Texas, the Texas Division of Emergency Management (TDEM) administers FEMA’s PA Program.

Due to the 75 percent federal cost share tied to the estimated PA cost, the total PA infrastructure unmet need was calculated from the remaining 25 percent (local match) of the project cost amount plus 15 percent of the approximate cost as a resiliency multiplier. The table below shows the breakdown of FEMA PA by damage category as reported by TDEM to the GLO in January 2025. FEMA PA categories A and B, removal of debris and emergency protective measures, respectively, have been excluded from the analysis.

Table 5-13: FEMA Public Assistance

PA Category	Estimated PA Cost	Local Match (25%)	15% Resilience Multiplier	Unmet Need
C - Roads and Bridges	\$ 123,438,531	\$ 30,859,633	\$ 18,515,780	\$ 49,375,412
D - Water Control Facilities	\$ 72,588,564	\$ 18,147,141	\$ 10,888,285	\$ 29,035,426
E - Building and Equipment	\$ 145,791,383	\$ 36,447,846	\$ 21,868,707	\$ 58,316,553
F - Utilities	\$ 81,566,022	\$ 20,391,505	\$ 12,234,903	\$ 32,626,409
G - Other	\$ 50,750,592	\$ 12,687,648	\$ 7,612,589	\$ 20,300,237
Total	\$ 474,135,092	\$ 118,533,773	\$ 71,120,264	\$ 189,654,037

Data Source(s): Texas Division of Emergency Management (TDEM), January 2025

The chart below displays the infrastructure damage (FEMA PA categories C-G) as a result of the 2024 Disasters by MID designation. While the HUD MID areas still show significantly greater values than the Secondary MID counties (75 percent in HUD MID areas, compared to 25 percent in Secondary MID counties), the split is not as evident as with the housing unmet need.

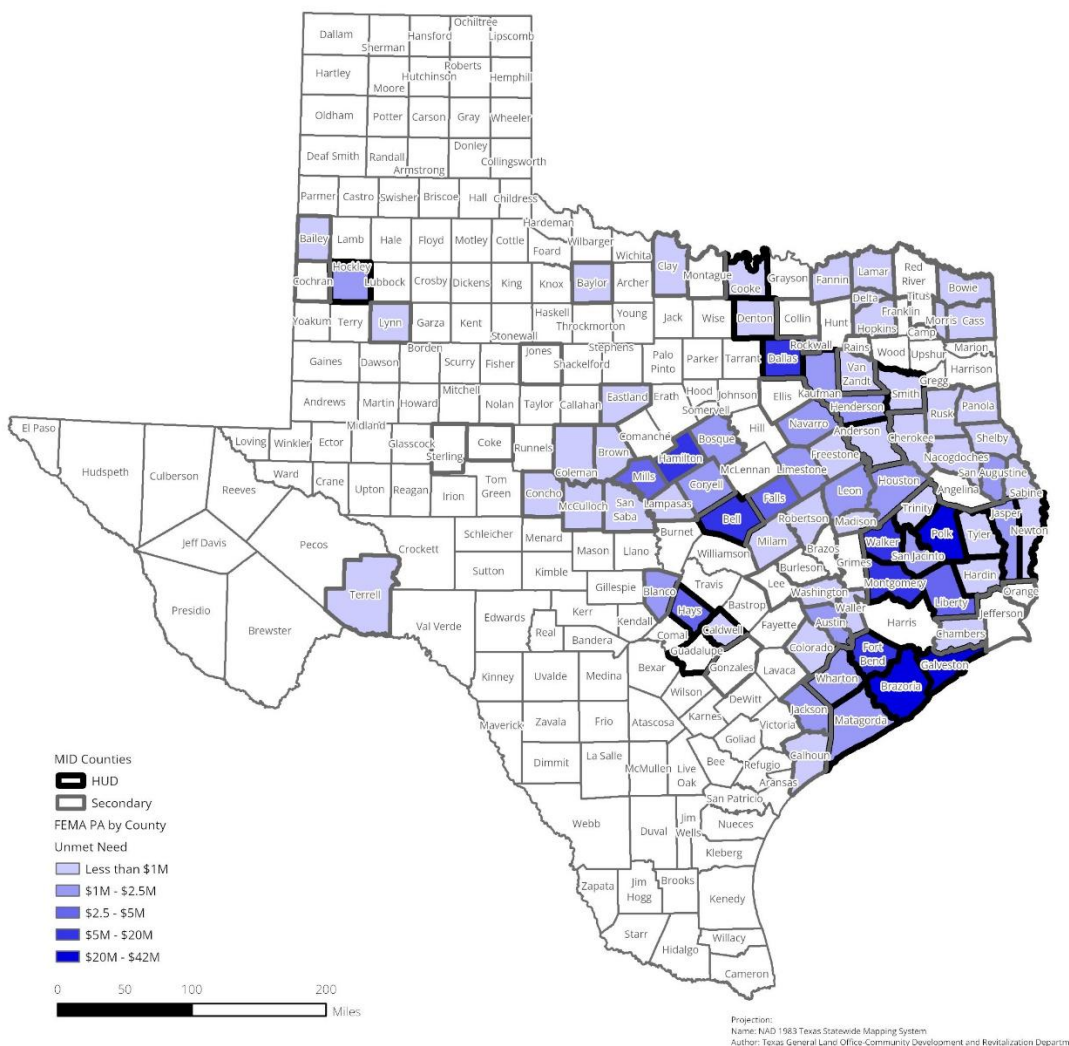
Table 5-14: Estimated FEMA PA (Categories C-G) Costs/Unmet Need by MID Designation

MID Designation	Estimated PA Cost	Local Match (25%)	15% Resiliency Multiplier	Unmet Need
HUD MID	\$ 355,670,529	\$ 88,917,632	\$ 53,350,579	\$ 142,268,212
Secondary MID	\$ 118,464,563	\$ 29,616,141	\$ 17,769,684	\$ 47,385,825
Total*	\$ 474,135,092	\$ 118,533,773	\$ 71,120,264	\$ 189,654,037

Data Source(s): Texas Division of Emergency Management (TDEM), January 2025

The map below illustrates this geographically, with the highest Unmet Need generally occurring in the HUD MID counties and concentrated in the eastern and central/north central part of the state.

Figure 5-6: FEMA PA Unmet Need by County and MID Designation



5.4. Economic Unmet Needs

Unemployment data for the MID counties from the Texas Workforce Commission Local Areas Unemployment Statistics (LAUS) shows that unemployment largely held steady across the state, and only slightly increased in the HUD MID and the Secondary MID counties after the 2024 Disasters compared with the year before.²⁵

Table 5-15: Change in Unemployment December 2023-2024

Area	Unemployment Rate (December 2023)	Unemployment Rate (December 2024)	Percent Change
HUD MID	3.76%	3.81%	1.30%
Secondary MID	3.82%	3.83%	0.39%
Statewide	3.70%	3.70%	0.00%

Data Source(s): Texas Workforce Commission (TWC), LAUS Report 2024

The Small Business Administration (SBA) offers Business Physical Disaster Loans (BPD) and Economic Injury Disaster Loans (EIDL) that cover insured and uninsured business losses. BPD are available to businesses of all sizes and types after a disaster to replace or repair damaged real estate, inventory, and fixtures. The BPD amount may be increased by as much as 20 percent of the total amount of physical loss, as verified by SBA, in order to mitigate the impacts of future natural disasters. EIDL are also available to a variety of businesses for up to \$2 million to meet necessary financial obligations (expenses the business would have paid if the disaster had not occurred).

Similar to SBA home loans, impacted businesses have to: (1) know that they can apply for an SBA business loan in order to apply for assistance; (2) demonstrate collateral; and (3) have acceptable credit to receive a loan. Consequently, SBA verified business loss data alone may underestimate the disaster’s impact on all businesses in communities. The table below shows the total applicants, business content loss, real estate loss, and total approved loan amount for all types of business loans issued by SBA. The data show that losses were greater in the HUD MID counties compared with the Secondary MID counties, though losses in the Secondary MID counties were still substantial. Approved loans for business losses were also substantial and help mitigate the need for additional business assistance.

²⁵ Texas Workforce Commission, LAUS

Table 5-16: Total Small Business Loans in Impacted Counties

MID Designation	Total Approved Applicants	Total Business Content Loss	Total Real Estate Loss	Total Verified Loss	Total Approved Loan Amount	Remaining Verified Loss
HUD MID	1,058	\$ 196,857,161	\$ 163,718,252	\$ 360,575,413	\$ 60,433,768	\$ 300,141,645
Secondary MID	107	\$ 35,502,244	\$ 14,436,696	\$ 49,938,940	\$ 6,241,554	\$ 43,697,386
Total	1,165	\$ 232,359,405	\$ 178,154,948	\$ 410,514,353	\$ 66,675,322	\$ 343,839,031
Data Source(s): Small Business Administration (SBA)						

Hurricane Beryl had an adverse effect on agricultural production in Texas. Fields of grain sorghum and corn, particularly those nearing harvest, suffered extensive wind damage as a result of the hurricane. According to the Texas Farm Bureau, grain sorghum fields in the middle of harvest were damaged and corn fields that were just a few days from harvest and cotton that was anywhere from two weeks to a month away from being defoliated. While most of the cotton bolls had not yet opened, protecting the lint, many cotton leaves were removed from plants, and most of the cotton crop at this point still needed photosynthesis. These plants’ yields were negatively affected by the storm.²⁶ Matagorda and Wharton counties saw significant damage to crops. Approximately 235,000 acres of crops, including corn, cotton, soybeans, and rice, were affected by the hurricane, with estimated losses reaching up to \$90 million. Cornfields experienced significant lodging, and cotton plants were severely twisted and entangled.²⁷

Ranchers also faced challenges such as damaged fencing and infrastructure, leading to increased labor and costs to secure livestock. The United States Department of Agriculture released a press release following Hurricane Beryl for the Livestock Indemnity Program (LIP).²⁸ This program is for ranchers who experienced livestock deaths or sold injured livestock at a reduced price due to the storm’s effect. The press release lists available technical and fiscal resources and relevant programs to provide assistance for those who suffered from agricultural damages (crop, infrastructure, livestock, and land losses or destruction) due to Hurricane Beryl.²⁹

The state estimates economic revitalization unmet needs by:

- Determining the median value of the combined real property and business content loss for applicants with combined real property and business content loss over \$30,000 (\$200,740.00).
- Multiplying that median value by the number of businesses with combined real property and business content loss over \$30,000 that were denied an SBA loan (800).

This results in an unmet need of \$160,592,000.

²⁶ Paul Rusnak, “Texas Ag Assessing Damages in Wake of Hurricane Beryl”, *Growing Produce*, July 16, 2024, <https://www.growingproduce.com/vegetables/texas-ag-assessing-damages-in-wake-of-hurricane-beryl/>.

²⁷ Katy News, Hurricane Beryl winds damage some crops, others benefit from rain, Kay Ledbetter, <https://thekatynews.com/2024/07/18/hurricane-beryl-winds-damage-some-crops-others-benefit-from-rain/>

²⁸ USDA, “USDA Offers Disaster Assistance to Agricultural Producers in Texas Impacted by Hurricane Beryl,” July 16, 2024, <https://www.fsa.usda.gov/news-events/news/07-16-2024/usda-offers-disaster-assistance-agricultural-producers-texas-impacted>.

²⁹ Ibid.

6. Mitigation Needs Assessment

The Mitigation Needs Assessment was created using information from the Texas Division of Emergency Management (TDEM). The following sections provide an updated summary of the Mitigation Needs Assessment which illustrates the risks and impacts Texas communities face from severe storms, wind, tornadoes, flooding, and hurricanes as well as the rationale for the mitigation set-aside detailed in the Use of Funds Section of this Action Plan.

6.1. State Hazard Mitigation Plan

The GLO identified and analyzed all significant current and future disaster risks and impacts using the [2023 Texas State Hazard Mitigation Plan \(SHMP\)](#) to summarize the state’s needs for disaster recovery and hazard mitigation. The SHMP is a FEMA-approved plan authored and maintained by TDEM and can be found on the TDEM website.³⁰ The Mitigation Needs Assessment aims to ensure that funds go towards programs and activities that reduce the risk of loss of life, injury, and property damage, as well as accelerate recovery following a disaster.

The state of Texas has multiple hazard mitigation funding opportunities administered by various state agencies. These statewide efforts include, but are not limited to, the Hazard Mitigation Grant Program (HMGP) administered by TDEM, the Institute for a Disaster Resilient Texas administered by Texas A&M University, and the Flood Mitigation Assistance (FMA) program administered by the Texas Water Development Board.

The 2023 SHMP details the top hazards that Texas has faced and their respective annualized losses from 2000 to 2021, outlined below:

Table 6-1: 2023 State Hazard Mitigation Plan Top Hazards by Annualized Losses, 2000-2021

Hazard	Annualized Losses, 2000-2021
Drought	\$538,660,410
Hurricane	\$514,587,309
Hailstorm	\$511,940,884
Flood	\$349,629,811
Tornado	\$126,144,198
Severe Coastal Flooding	\$111,432,362
Severe Wind	\$67,191,945
Severe Winter Weather	\$61,336,139
Wildfire	\$49,563,325
Lightning	\$3,899,827
Extreme Heat	\$45,123
Data Source(s): TDEM, SHMP 2023	

³⁰ TDEM, “Hazard Mitigation Section,” <https://tdem.texas.gov/mitigation/hazard-mitigation-section>.

6.1.1. Hurricane, Tropical Storm and Depressions Risk

Tropical cyclones include hurricanes, tropical storms and depressions, and are described in the 2023 SHMP as “large-scale, relatively slow-moving, rotating storm systems that originate over tropical or subtropical waters”. Due to factors including the size, speed and biometric pressure of the storm, as well as the direction and landfall location, these impacts of these storms can vary significantly from one event to another. Hurricane season officially runs from June 1 to November 30 and most significantly affects Texas communities along the Gulf Coast.

6.1.2. Flood Risk

The 2023 SHMP discusses the impacts of floods and the risk they pose to the state of Texas. Floods are typically long-term events lasting up to several days and can be complicated by a wide variety of factors including levels of precipitation, topography, ground saturation, duration of the event and upstream conditions. Flooding events fall into two distinct varieties: riverine, which is caused by rising water levels in streams and rivers, and pluvial, which is caused by extreme rainfall. The 2023 SHMP focuses on riverine flooding, as it historically has de-facto included pluvial flood risk.

6.1.3. Tornado Risk

The most powerful tornadoes are formed by rotations in horizontal wind shears associated with supercell thunderstorms. Tornadoes occur most frequently in central Texas north to the Oklahoma border, known as Tornado Alley, but can appear in any part of the state when conditions allow. Because tornadoes often appear along with other disasters, like hurricanes and straight-line winds, the combined affects can significantly increase the damage caused beyond the impacts that would occur from each separately.

6.1.4. Severe Wind Risk

Straight-line winds are commonly associated with severe thunderstorms and other disasters. The most intense version comes in the form of a derecho, or very long-lived and damaging thunderstorm. These wind events pose threats to lives, property and infrastructure through flying debris, downed trees, and powerlines. While the northern portion of the state is more prone to severe wind damage due to fewer natural windbreaks, severe winds pose a significant risk to the entire state.

7. Use of Funds

7.1. Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs

As required in the updated Universal Notice, as amended, and the Allocation Announcement Notice, the GLO will allocate at least 80 percent of the funds to address unmet needs within the HUD MID and GLO-designated HUD MID counties, as allowed under section III.D.2 of the updated Universal Notice, as amended. Up to 20 percent of the allocation may be used to address unmet disaster needs in the Secondary MID counties.

As required, a needs assessment has been completed to identify long-term needs and priorities for CDBG-DR funding allocated in response to the 2024 Disasters. The needs assessment considers a comprehensive set of data sources covering housing, infrastructure, and economic recovery across the MID areas. The assessment includes specific details about unmet needs within the eligible and most impacted and distressed counties, and includes details for housing, infrastructure, and economic revitalization. The needs assessment will be amended as additional information is available or updated.

To address unmet needs identified in the Unmet Needs Assessment, the recovery programs in this Action Plan primarily focus on addressing unmet housing needs, with approximately 80 percent of recovery program funds directly related to housing. These programs will address owner-occupied housing needs through the Homeowner Assistance Program (HAP) and Homeowner Reimbursement Program (HRP), and rental housing needs through the Affordable Rental Program (ARP).

While the 2024 Disasters had a wide range of housing impacts across both the HUD and Secondary MID counties, the majority of damage was concentrated in the HUD MID areas, with homeowners having a greater remaining unmet need. Because of the results of this analysis and HUD's encouragement to consider allocating funds exclusively to HUD MID counties, the 2024 Disasters housing recovery programs will only be eligible to applicants within the HUD MID counties. The focus of these housing programs will be on homeowners, through the Homeowner Assistance Program (HAP) and the Homeowner Reimbursement Program (HRP). The Affordable Rental Program (ARP) will also be available to ensure long-term unmet rental housing needs are met.

In comparison to the unmet housing needs, the amount of unmet infrastructure recovery needs is more consistently distributed between the HUD MID and Secondary MID counties. Because of this, the Local Communities Program (LCP) eligible area will include both the HUD MID and Secondary MID counties.

Economic revitalization activities are permitted under the Local Communities Program (LCP). While the 2024 Disasters did show an economic impact on the MID area, a portion of these needs have been met through SBA loans. Unemployment data for the MID area emphasizes the minimal level of unmet economic revitalization need compared to housing and infrastructure recovery

needs. The LCP will be available to assist with the remaining economic revitalization unmet need in both the HUD and Secondary MID counties as determined by local communities

It is anticipated that public service type activities may need to be utilized to complement the housing programs. Public service activities may include, but is not limited to, housing counseling, legal counseling, job training, mental health, and general health services which will be made accessible to individuals having wide-ranging disabilities including mobility, sensory, development, emotional, and/or other impairments. Although there are remaining unmet housing needs due to the limited funds available, 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 to holistic disaster recovery. 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.

In accordance with the provisions in the updated Universal Notice, as amended, and the Allocation Announcement Notice, HUD has designated \$72,481,000 to be used for mitigation activities; the GLO has integrated this mitigation set-aside amount into the Homeowner Assistance Program (HAP), Affordable Rental Program (ARP), and Local Communities Program (LCP). This does not preclude spending more than the designated amount should additional mitigation projects be funded. The GLO will incorporate hazard mitigation measures into the construction of single-family homes, affordable multifamily housing, and local infrastructure as appropriate to respond to the threat of the hazards identified in the Mitigation Needs Assessment. This may include activities such as elevations, flood and drainage improvements, roof ties, and other measures that increase resiliency.

The GLO has allocated five (5) percent of the total allocation for planning activities which will be used by the GLO to support this Action Plan and any necessary amendments.

The GLO has allocated five (5) percent of the total allocation for administrative costs, which include but are not limited to contract administration, compliance monitoring, and the provision of technical assistance to applicants and subrecipients.

The GLO has allocated five (5) percent of the total allocation for project delivery costs, for use in implementing and carrying out eligible activities. By providing direct support to subrecipients and in direct implementation of programs the GLO will help to ensure that the program is implemented as efficiently and expeditiously as possible.

In accordance with requirements in the updated Universal Notice, as amended, at least 70 percent of all program funds will be expended on projects that meet the LMI national objective. As allowed in section III.D.6.e of the updated Universal Notice, as amended, infrastructure projects that do not meet the LMI national objective may count the portion of project beneficiaries that are LMI towards the LMI goal by multiplying the percentage of LMI beneficiaries by the total project cost.

All 2024 Disasters program funds will be used in a manner that complies with applicable statutes, including:

- i. Section 109 of the HCDA, 42 U.S.C. 5309;

- ii. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- iii. Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- iv. Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;
- v. Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794;
- vi. The Americans with Disabilities Act of 1990, 42 U.S.C. 12131 et seq.; and
- vii. Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).

7.2. 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 nonprofit 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 and Real Property Acquisition Policies Act (URA), as waived, are met.

The relocation assistance requirements at section 104(d)(2)(A)(iii) and 104(d)(2)(B) 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 updated Universal Notice, as amended, 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, when applicable, 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 assures 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 RARAP defines “not suitable for rehabilitation” as those units for which the cost of rehabilitation, including clear consideration for resolving issues affecting health and safety, exceeds the cap allowed for the project type. The GLO will take the following steps and require subrecipients and developers to minimize the direct and indirect displacement of persons from their homes: (1) plan construction activities to allow tenants to remain in their units as long as possible, by rehabilitating empty units or buildings first; (2) where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement; (3) adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods;

(4) 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 (5) target only those properties deemed essential to the need or success of the project.

The RARAP emphasizes the GLO's commitment to planning construction activities that allow tenants to remain in their dwellings as long as possible, prioritizing the rehabilitation of empty units or buildings, and prioritizing the rehabilitation of housing rather than demolition to avoid displacement. The GLO will ensure displaced persons with disabilities have their accessibility needs met by moving them into accessible units.

Guidance on relocation considerations for persons with disabilities may be found in Chapter 3 of HUD's Relocation Handbook 1378.0.³¹

7.3. Reducing Impediments for Assistance

All marketing and outreach will be conducted via email, press releases, statements by public officials, media advertisements, social media postings, public service announcements, and/or contacts with community organizations to ensure that relevant parties are informed of the Action Plan, subsequent amendments, other pertinent materials, and program information. All critical documents will be posted on the GLO website.

Based on an assessment of the eligible area, the Action Plan in its entirety will be translated into Spanish. Recognizing there may be a need for individuals to have access to the document in additional languages, the GLO has contracted with a translation service to provide translations and interpretations upon reasonable request.

Translation services and assistance for those with hearing or speaking disabilities will also be available for program documents.

³¹ HUD, 2025, HUD's Public Housing Program, <https://www.hud.gov/hudclips/handbooks/cpd-1378-0>

7.4. Program Budget

Table 7-1: Program Budget

Programs	HUD MID	Secondary MID	Total Allocation	LMI Amount	Mitigation Set-Aside	% of Total Allocation by Program	% of Total Allocation
Homeowner Assistance Program (HAP)	\$ 244,100,000.00	\$ -	\$ 244,100,000.00	\$ 170,870,000.00	\$ 41,219,000.00	43.93%	67.54%
Homeowner Reimbursement Program (HRP)	\$ 43,100,000.00	\$ -	\$ 43,100,000.00	\$ 6,465,000.00	\$ -	7.76%	
Affordable Rental Program (ARP)	\$ 88,100,000.00	\$ -	\$ 88,100,000.00	\$ 88,100,000.00	\$ 14,877,000.00	15.85%	
Local Communities Program (LCP)	\$ 77,627,160.00	\$ 19,406,790.00	\$ 97,033,950.00	\$ 67,923,765.00	\$ 16,385,000.00	17.46%	17.46%
State Project Delivery	\$ 26,528,146.84	\$ 1,256,203.16	\$ 27,784,350.00	\$ 19,449,045.00	\$ -	5.00%	5.00%
State Planning	N/A	N/A	\$ 27,784,350.00	N/A	\$ -	5.00%	5.00%
State Administration	N/A	N/A	\$ 27,784,350.00	N/A	\$ -	5.00%	5.00%
Total	\$ 479,455,306.84	\$ 20,662,993.16	\$ 555,687,000.00	\$ 352,807,810.00	\$ 72,481,000.00	100.00%	100.00%

7.5. Homeowner Assistance Program (HAP)

7.5.1. Allocation Amount: \$244,100,000

- i. One hundred percent of funds must address unmet need in the HUD MID or GLO-designated HUD MID counties, as allowed under section III.D.2 of the updated Universal Notice, as amended.

7.5.2. Eligible Activities:

Eligible applicants can only apply for the Homeowner Assistance Program (HAP) or the Homeowner Reimbursement Program (HRP); applications for both programs are prohibited. Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(11), 105(a)(18), 105(a)(20), and 105(a)(25), include but are not limited to:

- i. Single-family owner-occupied rehabilitation and/or reconstruction;
- ii. Replacement of manufactured housing units;
- iii. Hazard mitigation;
- iv. Elevation;
- v. Relocation assistance through temporary relocation efforts associated with the Homeowner Assistance Program (HAP);
- vi. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services); and
- vii. Other activities associated with the recovery of single-family housing stock impacted.

7.5.3. Ineligible Activities:

- i. Forced mortgage payoff.
- ii. Properties that served as second homes at the time of the disaster, or following the disasters, are not eligible for assistance.
- iii. Rehabilitation / reconstruction of homes located in a floodway.
- iv. Rehabilitation / reconstruction of a house in which:
 - a. The combined household income is greater than 120 percent AMI or the national median;
 - b. The property was located in a floodplain at the time of the disaster; and
 - c. 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.

7.5.4. National Objectives:

- i. Low- and moderate-income (LMI)
 - a. A minimum of 70 percent of expenditures under this program will be on projects that meet the LMI national objective.
- ii. Urgent Need (UN)

7.5.5. Lead Agency and Distribution Model:

The Texas General Land Office (GLO) will administer the Homeowner Assistance Program (HAP). The distribution model will be direct implementation. The GLO will be the Responsible Entity for the environmental reviews for this program.

7.5.6. Program Description:

The Homeowner Assistance Program (HAP) will be directly administered by the GLO to rehabilitate and reconstruct owner-occupied single-family homes damaged by the 2024 Disasters.

7.5.7. Eligible Geographic Area:

- i. HUD MID or GLO-designated HUD MID counties, as allowed under section III.D.2 of the updated Universal Notice, as amended.

7.5.8. Other Eligibility Criteria:

- i. Home must have been:
 - a. Owner-occupied at the time of the disaster; and
 - b. Owned at the time of application.
- ii. Home must have served as primary residence at the time of the disaster.
- iii. Home must be located in a HUD MID or GLO-designated HUD MID county, as allowed under section III.D.2 of the updated Universal Notice, as amended.
- iv. Home must have sustained damage from the 2024 Disasters.
- v. Applicant must comply with GLO duplication of benefits requirements further outlined in the program policies and procedures.
- vi. Costs must be reasonable and within program caps.
- vii. All household members over the age of 18 must be current on payments for child support or have an approved payment plan.
- viii. Applicants 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. Applicants may not have applied for assistance under the Homeowner Reimbursement Program (HRP).
- xii. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to the 2024 Disasters to ensure duplication of benefits compliance. This is an agreement to repay duplicative assistance if other disaster assistance for the same purpose is later received.
- xiii. Unsecured Forgivable Promissory Note:
 - a. Assisted homeowners are required to maintain principal residency in the assisted property for 3 years. Cash-out refinancing, home equity loans, or any loans utilizing the assisted residence as collateral are not allowed for 3 years. A violation of this policy may activate the repayment terms of the Note.
 - b. 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 for the three-year period.
 - c. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the three-year period.

7.5.9. Maximum Amount of Assistance:

- i. Rehabilitation: Local composite builder bid amount not greater than \$90,000.
- ii. Historic Rehabilitation: Local composite builder bid amount not greater than \$175,000.
- iii. Reconstruction: Local composite builder bid amount based on procured builder and the builder's house plans based on household size.
- iv. Limited instances of providing exceptions to the maximum award amounts will be based on criteria specified in the housing policies and procedures and cost reasonableness.

7.5.10. Maximum Income of Household:

- i. The Homeowner Assistance Program (HAP) will set a maximum income of 200 percent of the area median income (AMI) for all beneficiaries. A minimum of 70 percent of program funds will be expended on projects that meet the LMI national objective, which is defined by HUD as households earning no more than 80 percent of the area median income (AMI).

7.5.11. Mitigation Measures:

Homeowner Assistance Program (HAP) projects will include mitigation measures that account for, on average, 18 to 33 percent of total home investments. Homeowner Assistance Program projects may include mitigation measures including, but not limited to:

- i. Elevating homes above base flood elevation;
- ii. Reinforced structural components for windstorm and impact;
- iii. Flood-resistant materials;
- iv. Erosion control measures; or
- v. Energy-efficient systems and appliances.

7.6. Homeowner Reimbursement Program (HRP)

7.6.1. Allocation Amount: \$43,100,000

- i. One hundred percent of funds must address unmet need in a HUD MID or GLO-designated HUD MID county, as allowed under section III.D.2 of the updated Universal Notice, as amended.
- ii. The program will first be available to LMI households for 60 days before being made available to non-LMI households.

7.6.2. Eligible Activities:

Eligible applicants can only apply for the Homeowner Assistance Program (HAP) or the Homeowner Reimbursement Program (HRP); applications for both programs are prohibited. Housing activities allowed under CDBG-DR; HCDA Section 105(a)(4):

- i. Reimbursement of expenses incurred by homeowners for repairs to a primary residence prior to the application for these funds.

7.6.3. Ineligible Activities:

- i. Forced mortgage payoff.
- ii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance.
- iii. Rehabilitation or reconstruction of homes located in a floodway.
- iv. Rehabilitation or reconstruction of a house in which:
 - a. The combined household income is greater than 120 percent AMI or the national median;
 - b. The property was located in a floodplain at the time of the disaster; and
 - c. 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.

7.6.4. National Objectives:

- i. Low- and moderate-income (LMI)
 - a. A minimum of 15 percent of expenditures under this program will be on projects that meet the LMI national objective.
- ii. Urgent need (UN)

7.6.5. Lead Agency and Distribution Model:

The Texas General Land Office (GLO) will administer the Homeowner Reimbursement Program (HRP). The distribution model will be direct implementation. The GLO will be the Responsible Entity for the environmental reviews for this program.

7.6.6. Program Description:

The GLO will administer the Homeowner Reimbursement Program (HRP) to provide reimbursement to homeowners for eligible expenses tied to repairs to their primary residence for damage related expenses incurred prior to their application submission. The program will first be available to LMI households for 60 days before being made available to non-LMI households.

7.6.7. Eligible Geographic Area:

- i. HUD MID or GLO-designated HUD MID county, as allowed under section III.D.2 of the updated Universal Notice, as amended.

7.6.8. Other Eligibility Criteria:

- i. Home must have been owner-occupied at the time of the disaster.
- ii. Home must have served as primary residence.
- iii. Home must be located in a HUD MID or GLO-designated HUD MID county, as allowed under section III.D.2 of the updated Universal Notice, as amended.
- iv. Home must have sustained damage from the 2024 Disasters.
- v. Applicant must comply with GLO duplication of benefits requirements further outlined in the program policies and procedures.
- vi. Costs must be reasonable and consistent with market costs at the time and place of construction and within program caps.
- vii. All household members over the age of 18 must be current on payments for child support or have an approved payment plan.
- viii. Applicants 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. Applicants may not have applied for assistance under the Homeowner Assistance Program (HAP)
- xii. Subrogation Agreement: Assisted homeowners must agree to a limited subrogation of any future awards related to the 2024 Disasters to ensure duplication of benefits compliance. This is an agreement to repay the duplicative assistance if other disaster assistance for the same purpose is later received.
- xiii. Unsecured Forgivable Promissory Note:
 - a. Assisted homeowners are required to maintain principal residency in the assisted property for one (1) 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 may activate the repayment terms of the note.
 - b. 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.
 - c. Insurance must be maintained at the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) will be monitored for the one-year period.

7.6.9. Assistance Limits Per Beneficiary:

- i. Maximum: \$75,000
- ii. Minimum: \$3,000

7.6.10. Maximum Income of Beneficiary:

- i. The Homeowner Reimbursement Program (HRP) will set a maximum income of 200% of the area median income (AMI) for all beneficiaries.

7.6.11. Mitigation Measures:

- i. The Homeowner Reimbursement Program (HRP) does not contain a direct mitigation component.

7.7. Affordable Rental Program (ARP)

7.7.1. Allocation Amount: \$88,100,000

7.7.2. Eligible Applicants:

All eligible entities will be payment and performance bonded. Bonds must be in the full amount of the GLO award and the GLO must be named as an obligee.

Only one award will be made per county until an eligible application has been conditionally awarded for each county represented by an application; remaining funds will then go to applications next on the list in the scoring category.

The eligible applicants for ARP are:

- i. Community Housing Development Organizations (CHDO);
- ii. 501(c)(3) or 501(c)(4) Not-For-Profit Organizations (NPO);
- iii. Local Public Housing Authorities (PHA);
- iv. Units of local governments;
- v. Private for-profit property owners (Residential Rental Property Owner); and
- vi. Federally recognized Indian tribes.

7.7.3. Eligible Activities:

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 multifamily housing projects.

7.7.4. Ineligible Activities:

- i. Any activity not identified above.

7.7.5. National Objective:

- i. Low- and moderate-income (LMI)
 - a. All expenditures under this program will be on projects that meet the LMI national objective.

7.7.6. Lead Agency and Distribution Model:

The Texas General Land Office (GLO) will administer the Affordable Rental Program (ARP) through subrecipients and developers. The applying subrecipients and developers will act as Responsible Entity for environmental reviews where possible.

7.7.7. Program Description:

The Affordable Rental Program (ARP) has been designed to provide funds for rehabilitation, reconstruction, and new construction of affordable multifamily housing projects in areas impacted by 2024 Disasters. Funding is available through the Community Development Block Grant Disaster Recovery (CDBG-DR) Program, administered by the GLO. There will be a single application cycle open for all requests for funding under the Affordable Rental Program (ARP).

The state may use CDBG-DR funds to rehabilitate units directly damaged by the disaster events or construct units to satisfy losses resulting from the events. Tie back to the disaster may be accomplished either through documented direct damage or demonstrated loss to local housing markets.

For rehabilitation projects, a 10-year LURA, and for reconstruction and new construction, a 20-year LURA will be placed on developments and any applicable lenders must agree to subordinate to the LURA. The applicant will guarantee completion of construction until a certificate of occupancy has been issued and retainage has been released. If a rental project that requires rehabilitation or reconstruction is subject to existing affordability requirements associated with other funding sources, the 10 or 20-year affordability period required under this notice may run concurrently (or overlap) with the affordability requirements associated with such other funding.

7.7.8. Eligible Geographic Area:

- i. HUD MID or GLO-designated HUD MID county, as allowed under section III.D.2 of the updated Universal Notice, as amended.

7.7.9. Other Eligibility Criteria:

- i. Property Types: Multifamily rental development is eight or more rental units under common ownership.
- ii. Development must meet CDBG-DR eligibility requirements per the housing guidelines.
- iii. Must demonstrate that the proposed development addresses rental unmet need from the 2024 Disasters.
- iv. A minimum of 51 percent of units must be restricted for a minimum affordability period of twenty (20) years for the new construction or reconstruction of affordable multifamily rental units, and restricted for ten (10) years for the rehabilitation of affordable multifamily rental units with eight or more units for LMI individuals earning 80 percent or less of the AMI at affordable rents. If an applicant chooses to combine types of construction (e.g. rehabilitation & new construction) the LURA will extend for the longest period applicable. The affordability periods also must:
 - a. Apply without regard to the term of any loan or mortgage, repayment of the CDBG-DR investment, or the transfer of ownership;

- b. Comply with HUD HOME Investment Partnership (HOME Rents and other existing LURA restrictions if applicable);
- c. Must be imposed by a deed restriction, a covenant running with the land, an agreement restricting the use of the property, or other mechanisms approved by HUD and must give the grantee or recipient the right to require specific performance; and
- d. Must be recorded in accordance with state recordation laws.
- v. Scattered site properties (properties with units located on non-contiguous plots) require each site to be 100% LMI.
- vi. Applicants must ensure construction costs are reasonable and consistent with market costs at the time and place of construction.

7.7.10. Project Selection Criteria:

The GLO will develop a Request for Application (RFA) and an application process. The RFA process will help identify the properties that support recovery.

If, after all scoring has been completed, one or more applications yield the same point total, priority shall be given to the most cost-effective project. Cost effectiveness shall be determined by calculating the lowest cost per unit (total number of units divided by the total amount of CDBG-DR funds requested). If, after all scoring and a tie breaker have been completed, and one or more applicants yield the same lowest cost per unit, preference shall be given to the application with the highest total number of LMI units.

Criteria	Maximum Points
Project Type	50 Points Possible
<i>Rehabilitation activity</i>	<i>50 points</i>
<i>Reconstruction activity</i>	<i>40 Points</i>
<i>New construction activity</i>	<i>35 points</i>
Declaration Areas	10 Points Possible
<i>Entity is within a CDBG-DR eligible county for <u>both</u> the Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781) <u>and</u> Hurricane Beryl (DR-4798).</i>	<i>10 Points</i>
<i>Entity is within a CDBG-DR eligible county for <u>only one</u> of the Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781) <u>or</u> Hurricane Beryl (DR-4798).</i>	<i>0 Points</i>
Density	10 Points Possible
<i>Project location has a density of under five hundred persons per square mile per census tract, per the American Communities Survey 5- year estimates</i>	<i>10 Points</i>
<i>Project location does not have a density of under five hundred persons per square mile per census tract,</i>	<i>0 Points</i>

Criteria	Maximum Points
<i>per the American Communities Survey 5- year estimates</i>	
Energy Efficiency	10 Points Possible
<i>Project meets minimum energy efficiency standards</i>	<i>10 Points</i>
<i>Project does not meet minimum energy efficiency standards</i>	<i>0 Points</i>
Poverty	5 Points Possible
<i>Property is located in a census tract with a poverty level less than 20% per the American Communities Survey 5- year estimates</i>	<i>5 Points</i>
<i>Property is not located in a census tract with a poverty level less than 20% per the American Communities Survey 5- year estimates</i>	<i>0 Points</i>
Extremely Low-Income Residents	5 Points
<i>The property will reserve 20% of units for extremely low-income (30% AMI) residents</i>	<i>5 Points</i>
<i>The property will not reserve 20% of units for extremely low-income (30% AMI) residents</i>	<i>0 Points</i>
Low- and Moderate-Income Residents	5 Points Possible
<i>The property will reserve 70% of units for low- and moderate-income (80% AMI) residents</i>	<i>5 Points</i>
<i>The property will not reserve 70% of units for low- and moderate-income (80% AMI) residents</i>	<i>0 Points</i>
Leverage	5 Points Possible
<i>Entity has pledged to provide Non-CDBG Leverage (a minimum value of 25% of CDBG-DR funds)</i>	<i>5 Points</i>
<i>Entity has not pledged to provide Non-CDBG Leverage (a minimum value of 25% of CDBG-DR funds)</i>	<i>0 Points</i>
First Tie-Breaker: Cost effectiveness	
Second Tie-Breaker: Total LMI units	

7.7.11. Assistance Limits Per Application:

- i. Minimum: \$500,000 per development
- ii. Maximum: \$7,500,000 per development

7.7.12. Mitigation Measures:

All Affordable Rental Program (ARP) developments will include mitigation measures including, but not limited to:

- i. Elevating above base flood elevation;
- ii. Reinforced structural components for windstorm and impact;



- iii. Flood-resistant materials;
- iv. Erosion control measures; or
- v. Energy-efficient systems and appliances.

7.8. Local Communities Program (LCP)

7.8.1. Allocation Amount: \$97,033,950

The GLO will ensure that projects funded by the LCP maintain overall HUD MID expenditures and LMI aggregate requirements in the update Universal Notice, as amended.

- i. At least eighty (80) percent of funds must address unmet need in a HUD MID or GLO-designated HUD MID county, as allowed under Section III.D.2 of the updated Universal Notice, as amended.
- ii. Up to twenty (20) percent of funds may address unmet need in the Secondary MID county.

7.8.2. Eligible Entities:

- i. Units of local government (cities and counties) and Indian tribes.

7.8.3. Eligible Activities:

All activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11-12), including but not limited to:

- i. Flood control and drainage repair improvements, including the construction or rehabilitation of storm water management systems;
- ii. Restoration of public infrastructure (such as water and sewer facilities, streets, provision of generators, bridges, communication systems, etc.);
- iii. Public facilities;
- iv. Buyouts or Acquisition with or without relocation assistance, down payment;
- v. Demolition, rehabilitation of publicly or privately owned commercial or industrial buildings, and code enforcement;
- vi. Economic revitalization (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;
- vii. Public service (such as job training and employment services, healthcare, childcare, and crime prevention within the 15 percent cap); and
- viii. Eligible planning studies not to exceed 15% of the program's allocation.

7.8.4. National Objectives:

- i. Low- and moderate-income (LMI)

- a. A minimum of 70 percent of expenditures under this program will be on projects that meet the LMI national objective. Infrastructure projects under this program may count funds expended for infrastructure activities towards benefitting LMI persons and meeting the overall benefit requirement by multiplying the total cost (including CDBG-DR and non-CDBG-DR costs) of the infrastructure activity by the percent of LMI persons in the service area, except that the amount counted shall not exceed the amount of CDBG-DR funds provided.
- ii. Urgent Need (UN)
- iii. Elimination of slum/blight (S/B)

7.8.5. Lead Agency and Distribution Model:

The Texas General Land Office (GLO) will administer the Local Communities Program (LCP) through subrecipients. The distribution model will be a call for projects followed by an invitation to apply. The applying city, county, or federally recognized Indian Tribe will be the Responsible Entity for environmental reviews.

7.8.6. Program Description:

The Local Communities Program (LCP) will provide disaster relief, long-term recovery, and restoration of infrastructure or economic revitalization for local communities impacted by the 2024 Disasters. Eligible entities may submit a maximum of two (2) applications per applicant. Submissions will be reviewed based on the selection criteria section below.

7.8.7. Eligible Geographic Area:

- i. HUD MID or GLO-designated HUD MID counties, as allowed under section III.D.2 of the updated Universal Notice, as amended.
- ii. Secondary MID counties.

7.8.8. Other Eligibility Criteria:

The financial and management capacity of each entity and feasibility for the submitted project to be completed within a reasonable 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 or tie-back to the 2024 Disasters;
- iii. Meet a HUD National Objective; and
- iv. Follow public participation process with a public comment period that includes an assessment of:
 - a. Who may be expected to benefit;

- b. The timing of who will be prioritized; and
- c. The amount or proportion of benefits expected to be received.

7.8.9. Project Selection Criteria:

The GLO will hold a call for project submissions with each eligible entity permitted to submit a maximum of two (2) eligible projects. Submissions will include a description and basic details of the proposed project. The GLO will then rank projects using the criteria defined in the Selection Criteria Section below. Submissions that are determined to be eligible will be selected for an invitation to apply in rank order. Depending on demand, no applicant will be awarded for their second application until all eligible applicants that have a minimum score of 50 have been awarded funding at least once.

Criteria	Maximum Points
LMI National Objective	20 Points Possible
<i>Project meets the LMI national objective</i>	<i>20 points</i>
<i>Project does not meet the LMI national objective</i>	<i>0 Points</i>
Declaration Areas	20 Points Possible
<i>Entity is within a CDBG-DR eligible county for <u>both</u> the Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781) <u>and</u> Hurricane Beryl (DR-4798).</i>	<i>20 Points</i>
<i>Entity is within a CDBG-DR eligible county for <u>only one</u> of the Texas Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4781) <u>or</u> Hurricane Beryl (DR-4798).</i>	<i>10 Points</i>
Leverage	10 Points Possible
<i>Entity has pledged to provide Non-CDBG Leverage (a minimum value of 5% of CDBG-DR funds)</i>	<i>10 Points</i>
<i>Entity has not pledged to provide Non-CDBG Leverage (a minimum value of 5% of CDBG-DR funds)</i>	<i>0 Points</i>
SoVI	15 Points Possible
<i>High</i>	<i>15 Points</i>
<i>Medium High</i>	<i>12 Points</i>
<i>Medium</i>	<i>9 Points</i>
<i>Medium Low</i>	<i>6 Points</i>
<i>Low</i>	<i>3 Points</i>
Total 2024 Disasters Damage per Capita (FEMA PA Categories C-G)	25 Points Possible
<i>\$500 per capita or greater</i>	<i>25 Points</i>
<i>\$100 per capita or greater</i>	<i>20 Points</i>
<i>\$50 per capita or greater</i>	<i>15 Points</i>
<i>\$25 per capita or greater</i>	<i>10 Points</i>
<i>Less than \$25 per capita</i>	<i>5 Points</i>
HUD MID	10 Points Possible
<i>Project is in a HUD MID county</i>	<i>10 Points</i>
<i>Project is in a Secondary MID county</i>	<i>5 Points</i>
Tie-Breaker: Higher Poverty Rate	



Criteria	Maximum Points
*More details on the scoring criteria will be available in the submission guidelines	

7.8.10. Maximum Amount of Assistance Per Application:

- i. Maximum Award: \$5,000,000
- ii. Minimum Award: \$500,000

7.8.11. Mitigation Measures:

Local Communities Program (LCP) may include mitigation measures, including but not limited to:

- i. Reinforcement of structures;
- ii. Flood and drainage activities;
- iii. Elevation of critical infrastructure;
- iv. Installation of generators for critical facilities;
- v. Incorporation of resilient construction standards; or
- vi. Reduction in storm water runoff.

7.9. Administration

State administrative costs will not exceed five (5) percent. Planning and administrative costs combined will not exceed 20 percent. The provisions outlined in 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.

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.

7.10. Planning

State planning costs will not exceed five (5) percent. Planning and administrative costs combined will not exceed 20 percent. State planning costs will be limited to activities in 24 CFR 570.205(a)(6), including policy, planning, management, and capacity building.

8. General Information

8.1. Citizen Participation

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 Citizen Participation Plan for the 2024 Disasters allocation was developed based on the requirements outlined in section I.C.2 of the updated Universal Notice, as amended. The GLO’s Citizen Participation Plan for the 2024 Disasters is available on the disaster recovery section of the GLO’s website.

8.2. Consultation During Action Plan Preparation

In the development of this disaster recovery Action Plan, the GLO consulted with disaster-affected citizens, stakeholders, local governments, state agencies, public housing authorities, Indian tribes, local Continuums of Care, HUD-approved housing counseling agencies, state housing finance agencies, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan.

To date, the GLO conducted consultation through the unmet needs survey and various in-person and virtual consultations with stakeholders and communities.

Table 8-1: 2024 Disasters Action Plan Consultations

Date	Parties Represented	Purpose
2/20/2025	Fort Bend County	Discuss potential funding opportunities
3/31/2025	Caldwell County	Provide information on 2024 Disasters
4/1/2025	Dickinson Bayou Watershed Steering Committee	2024 Disasters overview and eligibility discussion
4/1/2025	Houston-Galveston Area Council	2024 Disasters overview and infrastructure project discussion
4/1/2025	City of Newton	2024 Disasters overview
4/1/2025	Polk, Newton and Jasper Counties	2024 Disasters overview
4/1/2025	Guadalupe County	2024 Disasters overview and county eligibility
4/2/2025	Galveston County, State Congressman Weber, City of Kemah, City of Lake Jackson, City of Friendswood, Dickinson Bayou Watershed Committee, Clear Creek Watershed Committee	2024 Disasters overview



Date	Parties Represented	Purpose
4/2/2025	Representative Brad Buckley and staff	2024 Disasters overview
4/2/2025	Representative Cole Hefner and Chief of Staff	2024 Disasters overview
4/2/2025	Representative AJ Louderback and Chief of Staff	2024 Disasters overview
4/2/2025	Representative Hillary Hickland and staff	2024 Disasters overview
4/2/2025	Representative Ken King	2024 Disasters overview
4/3/2025	Representative Cody Vasult and Chief of Staff	2024 Disasters overview
4/3/2025	Calwell County	2024 Disasters overview
4/3/2025	Guadalupe County	2024 Disasters potential allocations
4/3/2025	BVCOG	2024 Disasters potential allocations
4/3/2025	City of Lockhart	2024 Disasters overview
4/3/2025	Southeast Texas Volunteer Organizations Active in Disaster (VOAD)	2024 Disasters overview and potential allocations
4/3/2025	San Jacinto County	2024 Disasters overview
4/4/2025	City of Sugar Land, Texas	2024 Disasters overview and potential allocations and programs
4/3/2025	Representative Trent Ashby	2024 Disasters overview and potential allocations
4/4/2025	North Houston Association (NHA)	2024 Disasters overview
4/4/2025	Tyler County	2024 Disasters overview
4/7/2025	Liberty County Long Term Recovery Committee	2024 Disasters overview and potential allocations and programs
4/8/2025	Hardin County	2024 Disasters overview
4/8/2025	Clear Creek Watershed Committee	2024 Disasters overview
4/8/2025	BVCOG	Potential eligible areas
4/8/2025	CAPCOG	2024 Disasters overview
4/8/2025	CTCOG	Potential eligible areas
4/9/2025	Brazoria County	2024 Disasters overview
4/11/2025	U.S. Congressman Tony Nehl's office	2024 Disasters overview and potential allocations and programs
4/11/2025	Fort Bend Recovers	2024 Disasters overview and potential allocations and programs
4/11/2025	Greater Houston Disaster Alliance	2024 Disasters overview and potential allocations and programs
4/11/2025	Galveston County Consolidated Drainage District	2024 Disasters overview and potential allocations and programs

Date	Parties Represented	Purpose
4/14/2025	Caldwell, Guadalupe, Hays, Bell, Trinity, Anderson, Henderson, Smith, Dallas, Denton, Hockley, and Cooke Counties	2024 Disasters overview survey
4/16/2025	City of Iola	2024 Disasters overview survey
4/16/2025	City of Giddings	2024 Disasters overview survey
5/28/2025	Texas Emergency Management Conference	2024 Disasters overview presentations

The GLO conducted a 2024 Disasters unmet needs survey. The unmet needs survey was distributed to close to 4,000 individuals in local governments, Federally recognized Indian tribes, the Federal government, Continuums of Care, Public Housing Agencies, HUD-approved housing counseling agencies, nongovernmental organizations, the private sector, and to other stakeholders and affected parties in the surrounding geographic area. The survey was also posted on the GLO website.

8.3. Public Comments

The GLO recognizes that affected stakeholders are the center of, and crucial partners in, the development of this Action Plan. The GLO will publish this Action Plan, as well as any substantive amendment, for a 30-day public comment period, which will be made available on the disaster recovery section of the GLO’s website. Citizens will be informed through social media and a statewide press release; in addition, a press release and an email notification will be sent to community organizations representing homeless and special needs populations, as well as all mayors, county judges, and tribal leaders in the declared areas and posted on the GLO’s website.

8.4. Public Hearings

Table 8-2: Initial 2024 Disasters Action Plan Public Hearing Schedule

Public Hearing #	Date and Time	Method
Hearing #1	Wednesday, May 21, 2025 – 12:00 PM	Virtual (Zoom)
Hearing #2	Thursday, May 22, 2025 – 6:00 PM	Virtual (Zoom)
Hearing #3	Friday, May 23, 2025 – 12:00 PM	Virtual (Zoom)

8.4.1. Access to Public Hearings

The GLO will provide reasonable accommodation for persons attending the virtual public hearings. The public hearings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 48 hours prior to the virtual public hearings. Please call 512-463-5139 or email cdr@recovery.texas.gov for assistance.

The virtual public hearings will be recorded, and presentation materials will also be available online for reference. Translated presentation materials will also be available online for reference.

8.5. Modifications to the Action Plan

Over time, recovery needs will change. The GLO will amend the 2024 Disasters Action Plan as often as necessary to best address our long-term recovery needs. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan. All amendments will be numbered sequentially and posted to the GLO website.

8.5.1. Substantial Amendment

A change to this Action Plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement; or
- The allocation or reallocation of more than \$25 million.

When the GLO pursues the substantial amendment process, the amendment will be posted on the GLO website for a 30-day public comment period. The initial Action Plan and all subsequent amendments will be posted in adherence with ADA requirements. The GLO will review and respond to a summary of all public comments received and submit to HUD for approval.

8.5.2. Nonsubstantial Amendment

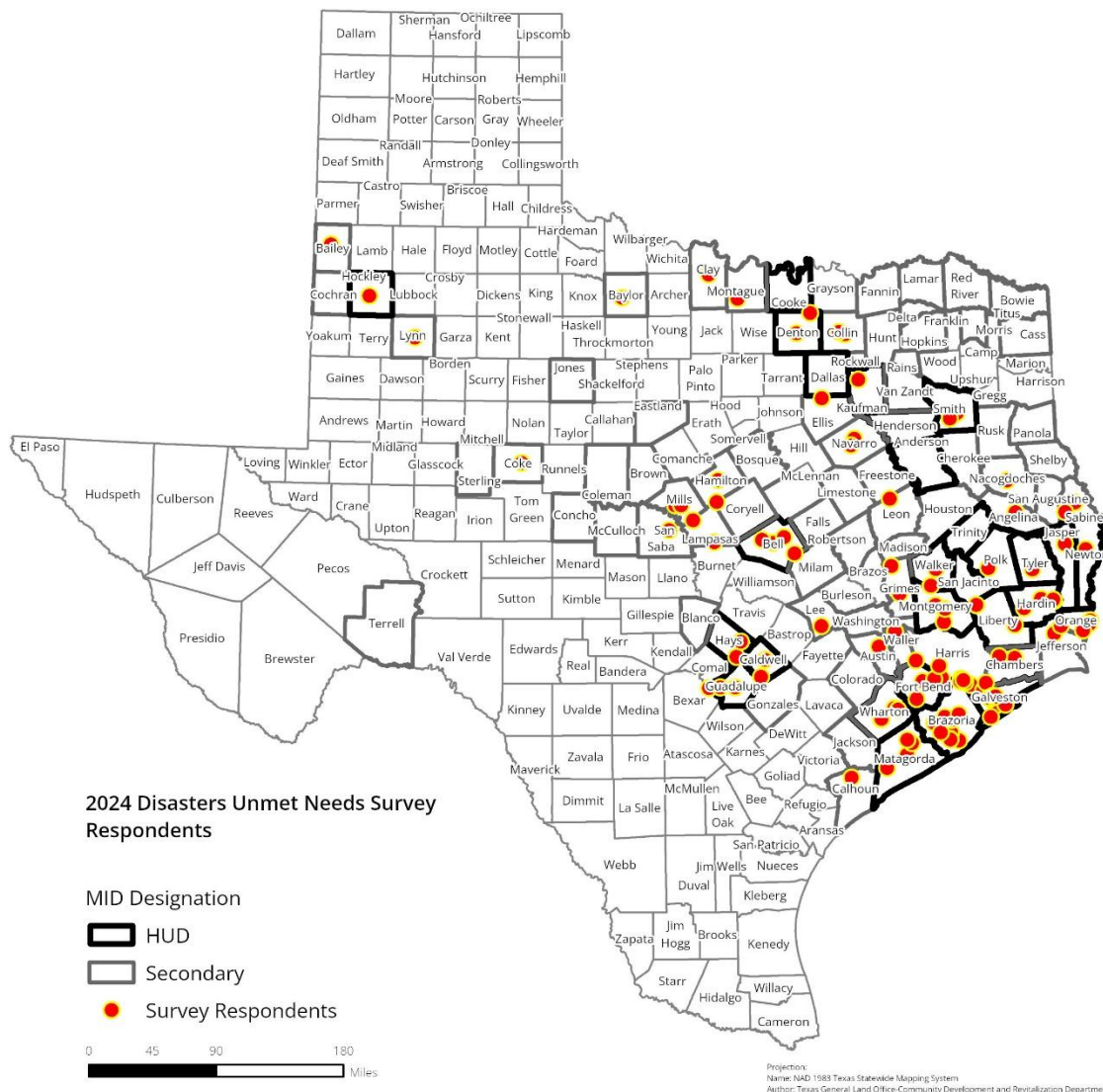
A non-substantial amendment is an amendment to the plan that includes technical corrections, clarifications, and/or budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. The GLO will notify HUD five business days before the change is effective.

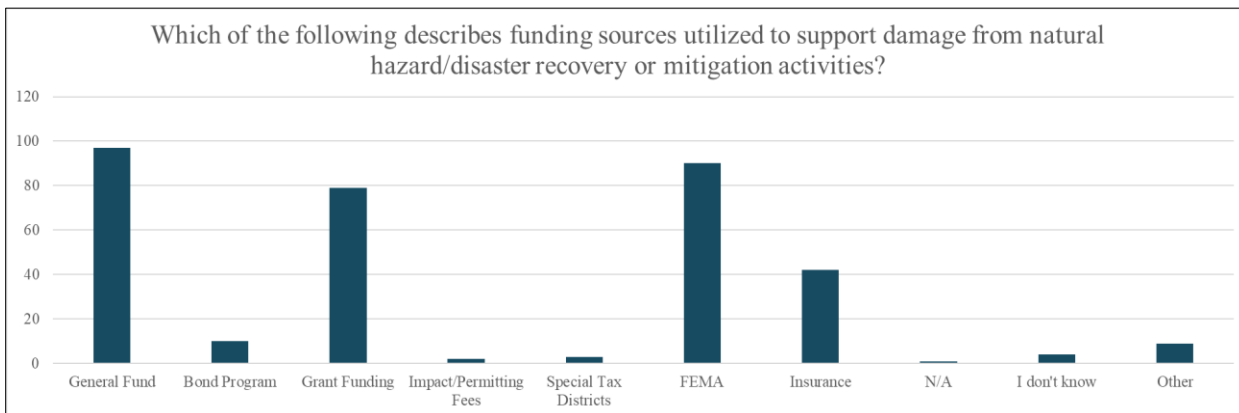
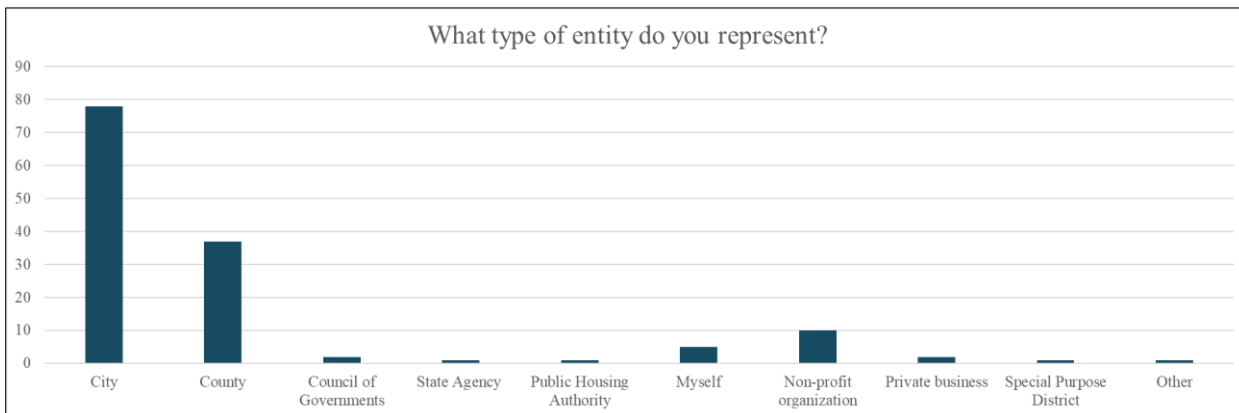
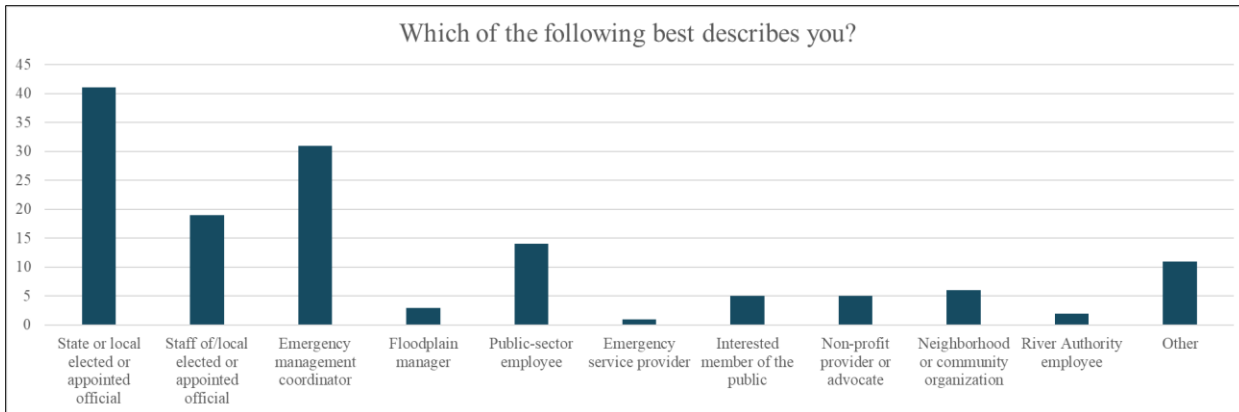
9. Appendices

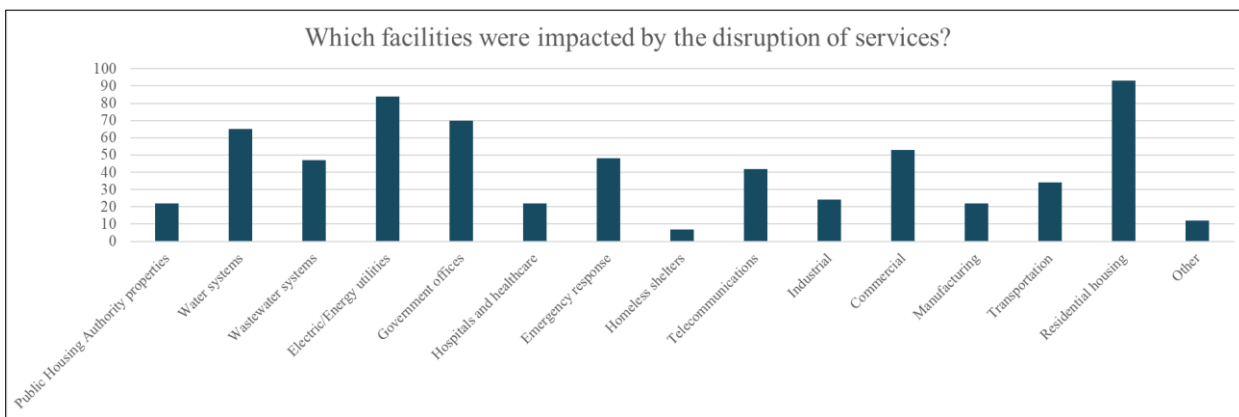
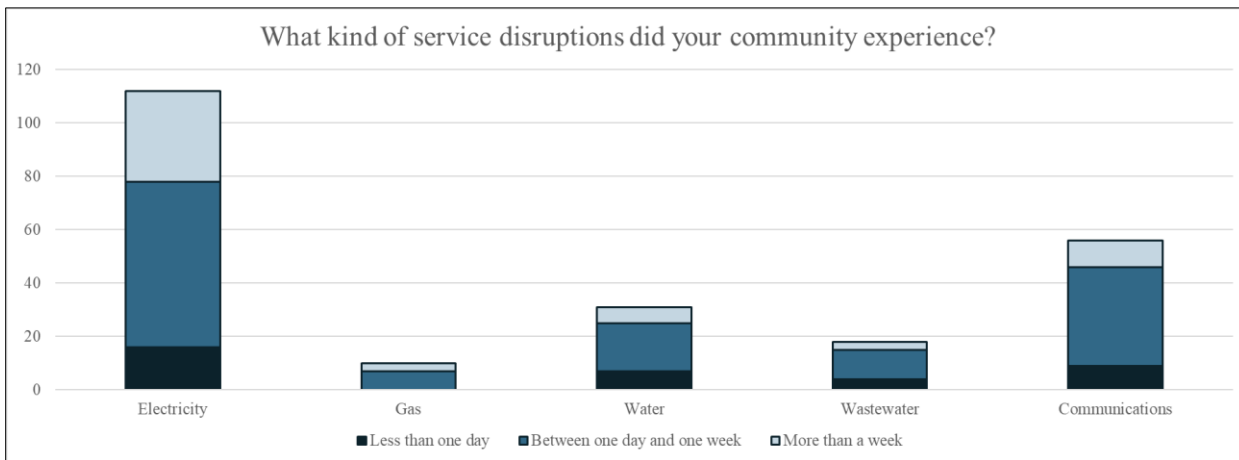
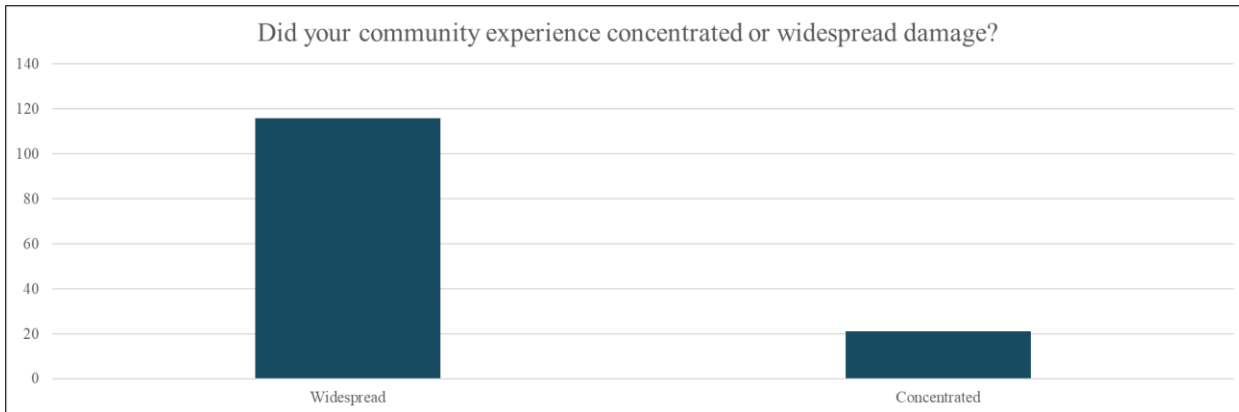
9.1. Appendix A: Unmet Needs Survey

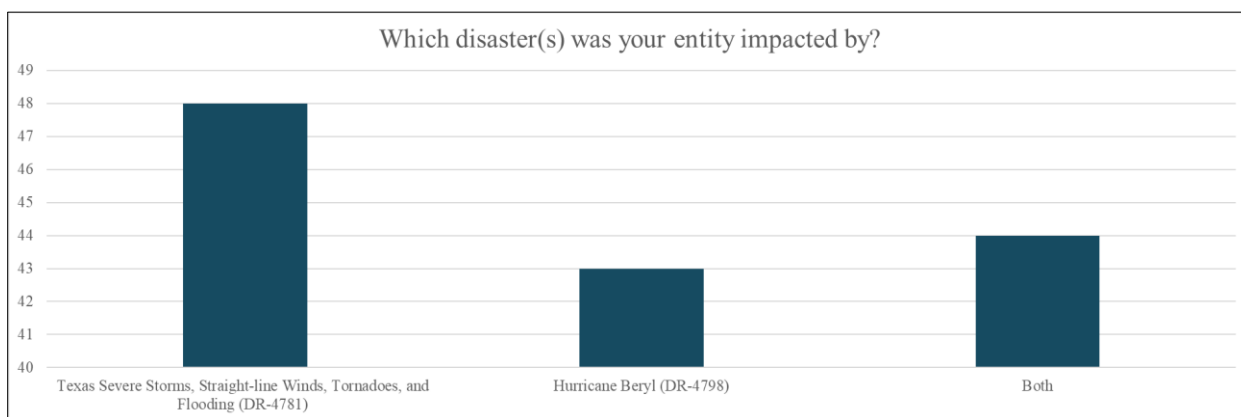
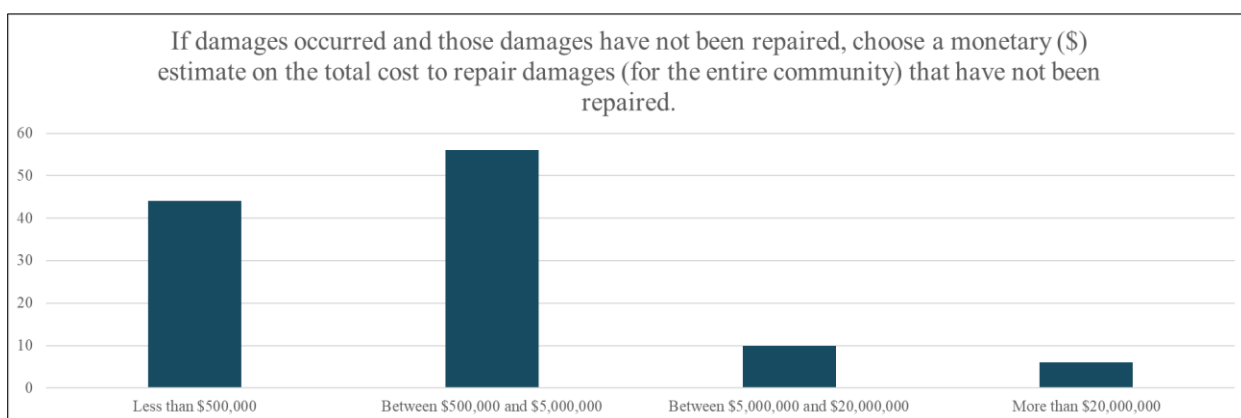
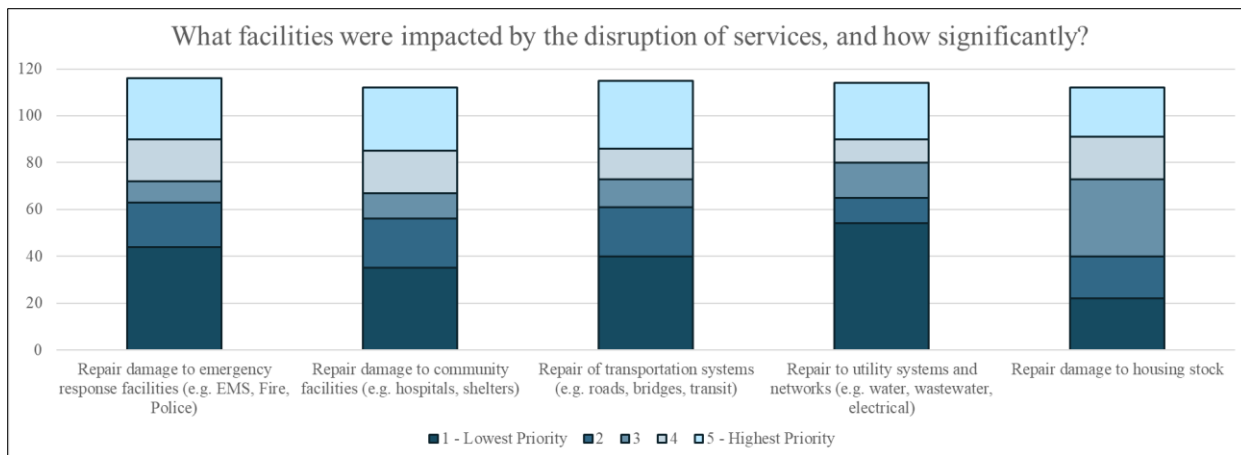
On March 31, 2025, the GLO launched a digital survey through the online service Survey123 to gauge the disaster recovery and mitigation needs of communities throughout the MID areas. Elected officials, representatives of local, regional, and state agencies, public housing representatives, private sector, and nonprofits focused on housing, disaster recovery, and the needs of low-income and vulnerable populations were contacted and encouraged to complete the survey.

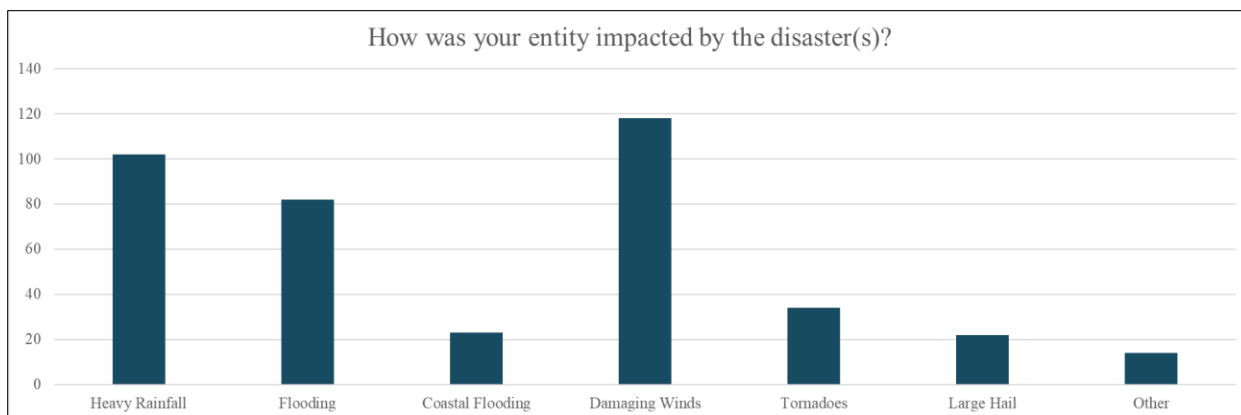
At the survey's end on Thursday, April 17, 2025, a total of 141 respondents from across the impacted area had provided valuable input. The results of the survey are included below in the following charts and graphs.











9.2. Appendix B: Certifications

Provisions at 24 CFR 91.225(a)(2), (4), (5), and (6); 91.225(b)(1), (2), (3), and (4); 91.325(a)(2), (4), (5), and (6); and 91.325(b)(1), (2), (3), and (4) are waived. Each grantee receiving a direct allocation under the updated Universal Notice, as amended, must make the following certifications with its Action Plan:

- a. Uniform Relocation act and Residential Anti-displacement and Relocation Plan: The Grantee certifies that it:
 1. Will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
 2. Has in effect and is following RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. Authority of Grantee: 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 as modified by waivers and alternative requirements.
- c. Consistency with the Action Plan: The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- d. Citizen Participation: 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 waivers and alternative requirements). 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 waivers and alternative requirements).

- e. Consultation with Local Governments: State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the State.
- f. Use of Funds: The grantee certifies that it is complying with each of the following criteria:
 - 1. Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
 - 2. Maximum Feasibility Priority. 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. Overall benefit. 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) of the grant amount is expended for activities that benefit such persons.
 - 4. Special Assessment. 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).
- g. Grant Timeliness: 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 applicable to the use of grant funds.
- h. Order of Assistance: The grantee certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

9.3. Appendix C: Summary and Response of Public Comments

The below section provides a summary of public comments received for the State of Texas 2024 Disasters CDBG-DR Action Plan during the public comment period of May 16, 2025, through June 16, 2025, and the three public hearings. The GLO has responded to a summary of comments in this section before submitting the Action Plan to HUD.

Table 9-1: Initial 2024 Disasters Action Plan Commentors

Name		Individual, County, City, or Organization
LAST	FIRST	
Brewer	Michelle	Jefferson County Long Term Recovery Group
Thapa	Elina	Home Innovation Research Labs **
Hartzell	Eric	GrantWorks **
Vedlitz	Arnold	Texas A&M University
Judson	Paul	DSW Homes
Rhodes, Ph.D.	Richard M.	TAMU – Central Texas
Wolfe III	June	TAMU Research Water Science Laboratory
Srinivasan	Raghavan	Texas A&M AgriLife Research
Gillette	Russell	Comanche County
Sides	Sherman	Comanche County
Singleton	Chance	Comanche County
Davis	Stephanie L.	Comanche County
Spain	Hal	Coke County
Ekowo	Manuela	Insurance Institute for Business & Home Safety
Miller	Julia	Runnels County
Miller	Roger	Coryell County
Rose	Hal A.	Kimble County
Castro	Russell	American Conservation Foundation
Beaty	Sidney	Texas Housers
Sloan	Maddie	Texas Appleseed
Duffy	Meg	Texas Appleseed
May	Whitley	Nolan County

** Denotes comment made during a live public hearing.

9.3.1. Summary of Comments Received During Public Hearings

9.3.1.1. May 21, 2025 Hearing

Comment Summary: The 2024 Disasters Action Plan should include certification to Green and Resilient Building standard like ICC-700 National Green Building Standard (NGBS), Enterprise Green Communities, or LEED (New Construction, Homes Midrise).

Response: Additional details regarding green and resilient building standards, such as ENERGY STAR (Certified Homes), Enterprise Green Communities, LEED (New Construction, Homes), or the ICC-700 National Green Building Standard, will be included in respective program guidelines and application guides.

9.3.1.2. May 22, 2025 Hearing

Comment Summary: Is the scoring factor for Damage Per Capita based on awarded amounts, or damage reports sent to the Texas Division of Emergency Management (TDEM)? We encourage the GLO to provide scoring factors as early as possible to allow communities as much time as possible to prepare applications.

Response: Additional program scoring details will be included in the respective program application guides ahead of the launch of each program.

9.3.1.3. May 23, 2025 Hearing

No comments received.

9.3.2. Summary of Comments Received Outside of Public Hearings

Comment Summary: The GLO should partner with and allocate funding to Long Term Recovery Groups in disaster recovery efforts and expand eligibility for them to receive program funding.

Response: Based on the unmet needs assessment conducted during the creation of the State of Texas 2024 Disasters CDBG-DR Action Plan, programs have been designed to directly assist homeowners, units of local government, and eligible entities capable of developing affordable multifamily housing. Due to the nature of these programs and the needs they are serving, long term recovery groups are not eligible applicants. Public outreach efforts will be conducted as a part of the housing programs to share programmatic information with the public and interested parties like long term recovery groups. Additional information will be made available on the GLO's website when the programs launch.

Comment Summary: The GLO should partner with public institutions of higher education in the implementation of the Action Plan

Response: Based on the unmet needs assessment conducted during the creation of the State of Texas 2024 Disasters CDBG-DR Action Plan, programs have been designed to directly assist

homeowners, units of local government, or eligible entities capable of developing affordable multifamily housing. Due to the nature of these programs and the needs they are serving, public institutions of higher education are not eligible applicants. Institutions of higher education may wish to work with these eligible applicants to support their applications.

Comment Summary: Site control should not be defined as site ownership for the Affordable Rental Program. Developers are not likely to purchase distressed properties or vacant lots that are only developable with the assistance of a grant if the chance of getting such grant is reduced. Site control should be the legal right and ability to access, use, and develop the land. This could be in the form of an option to purchase or other agreements granting the necessary rights to the property.

Response: Developers who do not own a property but have a documented purchase agreement will be considered as having site control for the Affordable Rental Program. Additional information on this topic will be included in the program guidelines. Acquisition costs will not be an eligible use of 2024 Disasters CDBG-DR grant funds. This has been clarified in the program in response to this comment.

Comment Summary: The state should require a designation from the Insurance Institute for Business and Home Safety (IBHS) FORTIFIED program for all projects to repair, rebuild, or replace damaged homes, small businesses, nonprofits, and public facilities.

Response: The programs in the State of Texas 2024 Disasters CDBG-DR Action Plan are designed to maximize flexibility in order to best serve Texans impacted by the 2024 Disasters and meet federal requirements. Additional details regarding resilient building standards will be included in respective program guidelines and application guides.

Comment Summary: Local and Regional planning should be an eligible activity, specifically to allow flood studies research and scientific modelling.

Response: Planning has been added as an eligible activity under the Local Communities Program in response to this comment. Additionally, since the Hurricane Harvey State Action Plan, approximately \$270 million has been allocated to planning activities to fund activities including river basin studies, the Resilient Communities Program, State and Local Hazard Mitigation Plan updates, and development and implementation of the Texas Disaster Information System (TDIS). Eligible planning activities will be in alignment with 24 CFR 570.205 and the HCDA 105(a)(12).

Comment Summary: Clarification should be added to the planning program regarding whether funds may be used to ensure the resiliency of funded projects.

Response: As outlined in section 7.10 of the State of Texas 2024 Disasters CDBG-DR Action Plan, the planning program will include state planning costs as outlined in 24 CFR 570.205(a)(6).

Comment Summary: The Homeowner Assistance Program (HAP) should clarify whether or not the \$90,000 rehabilitation maximum includes the mitigation measures listed in section 7.5.11.

Response: The \$90,000 maximum does include the mitigation measures costs listed in section 7.5.11.

Comment Summary: In the Homeowner Assistance Program, the GLO should carefully review the 18-33% maximum mitigation investment to ensure that homes that can be elevated and repaired are not inappropriately demolished.

Response: The 18 to 33 percent of total home investments figure is not set as a maximum amount to be expended on mitigation measures but serves as an estimation of the total amount of each home that will be considered a mitigation investment. Per project, costs for necessary mitigation measures will be calculated individually and will not be capped at the 18-33 percent amount. This has been clarified in the program in response to this comment

Comment Summary: The Action Plan ought to be updated to better account for heirs' properties where the occupants have inherited a property and may not be able to easily verify ownership, as this frequently presents a barrier to accessing housing assistance.

Response: The GLO does not provide services regarding ownership issues. In these situations, applicants are referred to a local Legal Aid organization. The program guidelines allow the submission of alternative documentation to establish ownership interest on a case-by-case basis, as determined by the GLO.

Comment Summary: Regarding the Homeowner Reimbursement Program (HRP), instead of using a 60-day period where the program is only available to LMI households, GLO should add language similar to the HAP program that 30% of funds be set aside for LMI households to better ensure access.

Response: The 60-day LMI-exclusive period will allow the program to serve low- and moderate-income households while maintaining maximum program flexibility. LMI households will still be eligible after the 60-day LMI-exclusive period.

Comment Summary: The Affordable Rental Program should not use density as scoring criteria. Density points drive funding away from areas where low-income, cost-burdened renters live, particularly renters of color, toward areas with lower shares of renters overall and with lower shares of low-income cost-burdened renters.

Response: This criterion is intended to encourage affordable rental projects across entire area impacted by the 2024 Disasters in order to address the significant and widespread unmet needs.

Comment Summary: The requirement under the Affordable Rental Program that only one award will be made per county until all counties have received a conditional award means that counties with larger populations and greater recovery needs may only see rural and suburban projects funded.

Response: This program limitation is intended to maximize the impact of the Affordable Rental Program by providing assistance to more of the impacted area, as opposed to a small number of projects concentrated in a single region.

Comment Summary: The density item doesn't appear to take land and water area into account. If this criterion is included – which it should not be – at a minimum final program guidance should give specific instructions for measurement of population density.

Response: The density scoring criterion will be scored using American Community Survey 5-year estimates. The GLO will provide guidance on all criteria at the launch of the program.

Comment Summary: The 50-point option under the Project Type criterion for the Affordable Rental Program incentivizing rehabilitation activities for project sizes of fewer than 8 units should be removed to allow for a larger variety of project sizes.

Response: The Affordable Rental Program guidelines have been updated to require a minimum project size of eight units in response to this comment.

Comment Summary: The Affordable Rental Program should prioritize projects with more units in order to be more efficient.

Response: The Affordable Rental Program guidelines have been updated to require a minimum project size of eight units in response to this comment.

Comment Summary: The Action Plan should specify that at least 80% of Affordable Rental Program funds should be spent in HUD-identified MID areas.

Response: As outlined in section 7.7.8.i of the State of Texas 2024 Disasters CDBG-DR Action Plan, 100% of Affordable Rental Program funds must be spent in HUD MID areas.

Comment Summary: In the Affordable Rental Program, a 40-year affordability period should be required regardless of construction type.

Response: The affordability period in the State of Texas 2024 Disasters CDBG-DR Action Plan matches the federal requirement laid out in section III.D.5.c of the updated Universal Notice, as amended. Additional information regarding affordability periods will be included in the program guidelines.

Comment Summary: The Affordable Rental Program should reduce the maximum income for restricted units to 60% AMI and increase the scoring criterion from 5 points to 20 points to better prioritize meaningful affordability.

Response: The 80 percent Area Median Income (AMI) limit has been selected to align with federal requirements and State Action Plans for prior disasters. The Affordable Rental Program scoring criterion in question incentivizes projects that reserve 20 percent of units for residents with extremely-low income (30 percent AMI or below). The GLO considers the five points awarded for achieving the scoring criterion sufficient to encourage developers to reserve units for extremely-low income renters while not restricting awards to only those projects that satisfy the criterion.

Comment Summary: All selected Affordable Rental Program projects must fall outside of a Federal Flood Risk Management Standard (FFRMS) floodplain.

Response: All 2024 Disasters projects located within an FFRMS floodplain are subject to HUD regulations regarding floodplain management found in 24 CFR Part 55. HUD regulations allow for HUD assistance in the FFRMS floodplain when application of the 8-Step Decision-Making Process outlined in 24 CFR 55.20 to a project reveals that the project has the potential to impact the floodplain of concern. In order to provide maximum flexibility, the Affordable Rental Program does not require all project sites fall outside of a floodplain when appropriate mitigation efforts are possible. Additional information regarding the requirements for projects located within floodplains will be included in the program guidelines.

Comment Summary: The Local Communities Program should prioritize flood control and drainage repair, restoration, and improvements over the other eligible activities listed.

Response: Because of the wide range of impacts from the 2024 Disasters, the Local Communities Program is designed to allow the funding of a variety of activities to best serve the needs of the impacted area.

Comment Summary: The Local Communities Program (LCP) should be restricted to funds for buyout programs that provide relocation and downpayment assistance to families.

Response: Because of the wide range of impacts from the 2024 Disasters, the Local Communities Program is designed to allow the funding of a variety of activities to best serve the needs of the impacted area.

Comment Summary: Any buyout activities in the Local Communities Program must provide relocation and downpayment assistance.

Response: The inclusion of relocation and downpayment assistance are allowable costs and will be determined by subrecipients of the Local Communities Program in their applications.

Comment Summary: The current project maximum of \$5 million, while enabling a wider spread of funding, may be too low to fund projects that serve larger or denser benefit areas.

Response: The GLO considered cost effectiveness and maximum benefit to affected areas and available funds when establishing per-project limits. The \$5 million project maximum allows the Local Communities Program to provide assistance across the eligible area while offering a per-project amount large enough to fund expansive projects.

Comment Summary: The number of points available for non-CDBG leverage should be decreased from 10 to 5 points to reduce barriers to rural and low-capacity municipalities that cannot fund infrastructure projects.

Response: Encouraging entities to provide 5 percent of the total project cost as non-CDBG leverage helps ensure that the projects selected maximize program funds and are utilized by entities with significant need. While the GLO has prioritized the inclusion of non-CDBG leverage in proposed project budgets, communities are not disqualified from receiving awards by not providing non-CDBG funding.

Comment Summary: “At affordable rents” should be defined to mean that the tenant pays no more than 30% of their income towards rent and utilities.

Response: The GLO uses HUD’s HOME program limits to determine affordable rent, which can be found on the HUD Exchange website. The rent for affordable units does not exceed the High HOME rent program limits.