



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

October 3, 2018

Joe Brannan
Executive Director
Golden Crescent Regional Planning Commission
1908 N Laurent, Ste 600
Victoria, TX 77901

**Re: Golden Crescent Regional Planning Commission Method of Distribution (MOD) —
2017 Hurricane Harvey CDBG-DR Funds**

Dear Mr. Brannan:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has completed its review of materials submitted in support of Golden Crescent Regional Planning Commission's (GCRPC) proposed MOD for the Community Development Block Grant Disaster Recovery (CDBG-DR) funds reserved for communities affected by Hurricane Harvey. We are happy to inform you that GCRPC's MOD submitted on July 13, 2018, with supplemental material submitted on August 9, 2018, is approved.

GLO-CDR approves GCRPC's proposed allocation of Local Buyout and Acquisition Program and Local Infrastructure Program funds to the identified entities. The terms of the approval are noted below:

1. As part of the application process, subrecipients are required to hold a public hearing and conduct outreach to local governments; housing advocacy organizations; faith-based organizations; community groups representing protected classes and vulnerable populations; groups interested in fair housing issues; and limited English proficient (LEP) persons.
2. Acceptance of the MOD does not indicate eligibility or approval of funding for any proposed projects.
3. GCRPC's allocation must meet the requirement that 70 percent of funds benefit low- to moderate-income persons. Projects that do not meet HUD's national objective for benefitting low- to moderate-income persons may not be approved until this allocation requirement is met.

GCRPC MOD Approval Letter

October 3, 2018

Page 2

4. Acceptance of the MOD does not indicate approval of any proposed re-allocation recommendations.

If you have any questions, please feel free to contact me at (512) 475-5027, or Alexandra Gamble, Manager, Policy Development, at alexandra.gamble.glo@recovery.texas.gov or (512) 475-5021.

Sincerely,



Heather Lagrone, Deputy Director
Community Development and Revitalization
Texas General Land Office

cc: Michael Ada, Director, GCRPC
Alexandra Gamble, Manager, Policy Development, GLO-CDR
Shawn Strange, Program Manager, Policy Development, GLO-CDR
Zachary Stern, Planner, Policy Development, GLO-CDR
Christopher Smith, Planner, Policy Development, GLO-CDR

MOD Summary Form



Golden Crescent Regional Planning Commission (RPC) Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information

Contact Information

Regional Planning Commission (RPC): **Golden Crescent Regional Planning Commission (GCRPC)**

Principal Contact Name, Title: **Michael Ada, Director of Economic Development, Response, & Recovery**

Principal Contact Telephone: **361-578-1587**

Principal Contact Email: **michaela@gcrpc.org**

Principal Contact Address: **1908 N. Laurent, Suite 600**

City, State, Zip: **Victoria, Texas 77901**

Allocation Summary

Regional Allocation for All Programs: **\$ 54,475,236**

Local Buyout and Acquisition Program Total: **\$ 18,430,647**

Local Infrastructure Program Total: **\$ 36,044,589**

Citizen Participation

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

GCRPC engaged in Citizen and Non-Governmental Organization (NGO) outreach through 1) the GCRPC website, 2) public notices, and 3) press releases. GCRPC staff also engaged in verbal notification throughout the region prior to and during the public comment period while participating various public meetings. Citizens and NGOs were encouraged to review the GCRPC Method of Distribution (MOD) made available through the GCRPC website and participation in scheduled public hearings. Citizens and NGOs were allowed to submit written comments to the GCRPC via letter or email. Additionally, citizens and NGOs were allowed to comment when attending scheduled public hearings where comments will be recorded.

First Public Hearing Information

Date/Time: 6/18/2018 – 6:00 PM Location: Victoria Tower Conference Room, 1908 N. Laurent, 2nd Floor, Victoria, Texas 77901

Attendance: 5 Public Planning Meeting:

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

<input type="checkbox"/>	Method	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	6/7/2018	See Attachments.
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

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

<input type="checkbox"/>	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	RPC Website	6/4/2018 - Continuous	www.gcrpc.org

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

<input type="checkbox"/>	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	Various	Beginning 6/3/2018	See Attachments.
<input checked="" type="checkbox"/>			

Citizen Comment Documentation

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, meeting discussion is attached.
Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages (persons with Limited English Proficiency).	Public Notices were published in English and Spanish. Additionally, GCRPC offered accommodations for those with modified communication needs upon timely request.

Second Public Hearing Information¹

Date/Time: 7/9/2018 – 6:00 PM Location: Victoria Tower Conference Room, 1908 N. Laurent, 2nd Floor, Victoria, Texas 77901
 Attendance: 5 Public Planning
 Meeting:

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

	Method	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	6/7/2018	See Attachments.
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

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

	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	RPC Website	6/4/2018 - Continuous	www.gcrpc.org

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

	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	Various	Beginning 6/3/2018	See Attachments.
<input type="checkbox"/>			

Citizen Comment Documentation

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, and meeting discussion is attached.
Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages.	Public Notices were published in English and Spanish. Additionally, GCRPC offered accommodations for those with modified communication needs upon timely request.

¹ If RPC held third public hearing, insert information after second public hearing information.

Long-Term Planning and Recovery

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

GCRPC's methods of distribution (MODs) foster long-term community recovery by adhering to HUD and GLO funding guidelines for the Local Buyout and Acquisition Program and the Local Infrastructure Program. These mandatory limitations on the use of allocated funds ensure entities meet state and federal goals identified in the State Action Plan and Federal Register. Additionally, interested parties were provided with multiple opportunities to comment and request revisions of the MODs throughout the development period. The submitted MODs represent all parties' interest in approaching long-term recovery in a regional and equitable manner.

Unmet Housing Needs

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

Funding allocated to the GCRPC region for the Local Buyout and Acquisition Program may be utilized by eligible entities for all eligible buyout and acquisition activities that adhere to GLO and HUD guidelines. This approach provides entities with maximum flexibility to develop customized Local Buyout and Acquisition Programs and fund projects addressing any unmet housing needs unique to their respective communities. Additionally, local control will ensure long-term recovery and housing restoration efforts in the HUD-identified most impacted and distressed areas and/or other impacted areas 1) align with local, state, and federal guidelines; and 2) prioritize the use of funding according to local housing needs.

Similarly, funding allocated to the GCRPC region for the Local Infrastructure Program may be utilized by eligible counties and cities for all eligible local infrastructure activities that adhere to GLO and HUD guidelines. This approach provides entities with maximum flexibility to develop customized Local Infrastructure programs to address any unmet infrastructure needs unique to their respective communities. Local control local control will ensure long-term recovery and housing restoration efforts in the HUD-identified most impacted and distressed areas and/or other impacted areas 1) align with local, state, and federal guidelines; and 2) prioritize the use of funding according to local infrastructure needs.

Affirmatively Furthering Fair Housing Statement

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

Low-to Moderate Income Requirement

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

Each allocation to an eligible entity is coupled with a 70% low-to-moderate income (LMI) requirement amount for each program. Thus, each entity allocated funding is aware of the total amount of funding required to either benefit areas that are 51% or more LMI households or households with incomes below 80% of the Area Median Income (AMI)

Each entity responsible for the management and administration of allocated program funds is required to generate, maintain, and submit, all evidence supporting a project’s adherence to the 70% LMI requirement.

Local Buyout and Acquisition Program Method of Distribution Detail

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

Distribution Factors

The RPC has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Unmet Need + Resiliency	50	U.S. Census Bureau; FEMA; GLO SAP	See Attached Narrative.

1+(Raw SoVI – Min Raw SoVI)	40	GLO SAP; Dr. Christopher Emrich, University of Central Florida	See Attached Narrative.
Unmet Need Per Capita	10	U.S. Census Bureau; FEMA	See Attached Narrative.

*Add more rows if needed

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

Eligible Activities

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

The RPC has addressed prioritization of eligible activities as follows:

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

Ineligible Activities

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

Local Infrastructure Program Method of Distribution Detail

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

Distribution Factors

The RPC has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Unmet Need + Resiliency	50	U.S. Census Bureau; FEMA; GLO SAP	See Attached Narrative.
1 + (Raw SoVI – Min Raw SoVI)	40	GLO SAP; Dr. Christopher Emrich, University of Central Florida	See Attached Narrative.

Unmet Need Per Capita	10	U.S. Census Bureau; FEMA	See Attached Narrative.

*Add more rows if needed

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

Eligible Activities

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

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

The RPC has addressed prioritization of eligible activities as follows:

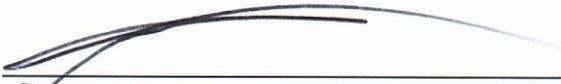
<input checked="" type="checkbox"/>	The RPC has chosen not to limit Grantees in the region to projects meeting regional priority activities.		
-OR-			
<input type="checkbox"/>	The RPC has limited Grantees in the region to selecting projects meeting the following regional priority activities:		
<input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

Ineligible Activities

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

Approval and Signatory Authority

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



Signature
 Joe Brannan

Printed Name
 jbrannan@gcrpc.org

Email Address

08/7/2018

Date
 Executive Director

Title
 361-578-1587

Telephone Number

U.S. Department of Housing and Urban Development (HUD) – Texas General Land Office (GLO) - Golden Crescent Regional Planning Commission (GCRPC)

Hurricane Harvey, Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding

REGIONAL DISTRIBUTION SUMMARY

Table 1

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647	33.83%
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589	66.17%
Total Regional Allocation				\$ 54,475,236	

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Homeowner Assistance Program	\$ 32,657,218	\$ 23,281,471	\$ 39,157,082	\$ 55,938,689	50.66%
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647	16.69%
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589	32.64%
Total Regional Allocation				\$ 110,413,925	

State of Texas Plan for Disaster Recovery: Hurricane Harvey Round 1 (State Action Plan), April 6, 2018, Texas General Land Office Community Development & Revitalization Program

The GCRPC was tasked by the GLO to develop methods of distribution (MOD) for Hurricane Harvey, CDBG-DR funds for the state’s Local Buyout and Acquisition Program (LBAP) and Local Infrastructure Program (LIP). The GCRPC will implement a funding distribution scheme based on the analysis and methodology utilized by the GLO in its distribution of CDBG-DR funds to the regions within the Hurricane Harvey declared disaster areas. See *State Action Plan, Regional Methods of Distributions: XI. Appendix F, pp 118-128*. Baseline funding amounts, to be distributed amongst eligible entities throughout the region, have been provided by the GLO. Amounts allocated to HUD Most Impacted Areas (80%) and State Most Impacted Areas (20%) for LBAP and LIP are not subject to change.

The HUD CDBG-DR Federal Register Notice of Funding Opportunity (Vol.83, No28, Friday, February 9, 2018) requires that 80% of the total regional allocation is to be received by Victoria County and the area encompassed by the 77979 ZIP code in Calhoun County.

The remaining counties (Calhoun [outside of 77979], DeWitt, Goliad, Gonzales, Jackson, and Lavaca) are designated to receive 20% of the HUD funding allocated to the GCRPC region. The subgrouping of eligible entities is incorporated into the distribution methodology used to develop LBAP and LIP spreadsheets. Altogether, there are seventy-three (73) entities with eminent domain authority within the GCRPC region. Of the seventy-three (73) eminent domain authority entities, seven (7) private utilities are ineligible for LBAP funds per HUD guidance in *Federal Register Vol. 83, No 28, Friday, February 9, 2018, Notices*. The remaining sixty-six (66) cities, counties, and entities with eminent domain authority are all eligible to receive LBAP Funds. Twenty-six (26) cities and counties are eligible to receive LIP funds.

See Attachment 1 – CDBG-DR GCRPC Eligible Entity Distribution Summary.

The State Action Plan contains a number of requirements whose adherence impacts the outcomes displayed in LBAP and LIP spreadsheets. Beyond the 80% minimum distribution to HUD defined Most Impacted Areas and the 20% minimum distribution to HUD defined Impacted Areas, 70% of project funds awarded must provide benefit to Low to Moderate Income populations. Additionally, LBAP eligible entities receiving funding must receive a minimum of \$1,000,000 through the applied MOD and LIP eligible entities must receive a minimum of \$100,000 through the applied MOD.

Descriptions of the factors and resulting percentages utilized by GCRPC to distribute funds are as follows:

Local Buyout and Acquisition Program (LBAP) FACTORS:

- **HUD Most Impacted Counties and Zip Codes (80%)**
 - County, City, or Zip Code Population
 - Median Value of Housing Units for Homeowners/Median Value of Constructing Rental Unit for Renters
 - FEMA Verified Count of Unmet Need—Major/Low Damage Severity
 - FEMA Verified Count of Unmet Need—Major/High Damage Severity
 - FEMA Verified Count of Unmet Need—Severe Damage
 - Total FEMA Verified Count of Unmet Need Units
 - Unmet Need \$ Amount - Derived Using Severity Levels
 - 15% Resiliency
 - Unmet Need \$ Amount + (plus) 15% Resiliency - Derived Using Severity Levels
 - Unmet Need + (plus) Resiliency Removing Any Overlap
 - Raw Social Vulnerability Index Score (SoVI)
 - Positive SoVI
 - Estimated Unmet Need + (plus) Resiliency Amount Per Capita
- **State Most Impacted Areas (20%)**
 - County or City Population
 - Median Value of Housing Units for Homeowners/Median Value of Constructing Rental Unit for Renters
 - FEMA Verified Count of Unmet Need—Major/Low Damage Severity
 - FEMA Verified Count of Unmet Need—Major/High Damage Severity
 - FEMA Verified Count of Unmet Need—Severe Damage
 - Total FEMA Verified Count of Unmet Need Units
 - Unmet Need \$ Amount - Derived Using Severity Levels
 - 15% Resiliency
 - Unmet Need \$ Amount + (plus) 15% Resiliency - Derived Using Severity Levels
 - Unmet Need + (plus) Resiliency Removing Any Overlap
 - Raw SoVI
 - Positive SoVI
 - Estimated Unmet Need + (plus) Resiliency Amount Per Capita

Resulting LBAP Distribution PERCENTAGES:

- Distribution Percentage Based on Unmet Need + (plus) Resiliency
- Distribution Percentage Based on 1 + (plus) (Raw SoVI – (minus) (Minimum Raw SoVI)) (Min Raw SoVI)
- Distribution Percentage Based on Per Capita Unmet Needs
- Combined Distribution Percentage Based on Model with 50% (Unmet Need + (plus) Resiliency), 40% (1+Raw SoVI – (minus) Min Raw SoVI), and 10% (Unmet Need Per Capita)

Local Infrastructure Program (LIP) FACTORS:

- **HUD Most Impacted Counties and Zip Codes (80%)**
 - County or City Population
 - Projected Public Assistance (PA) cost
 - Unmet need = 10% county/city matching requirement of total project costs
 - Resiliency = 15% of total project costs
 - 1 + (plus) Raw SoVI – (minus) Min Raw SoVI
 - Estimated Unmet Need + (plus) Resiliency Amount Per Capita

- **State Most Impacted Areas (20%)**
 - County or City Population
 - Projected PA cost
 - Unmet need = 10% county/city matching requirement of total project costs
 - Resiliency = 15% of total project costs
 - 1 + (plus) Raw SoVI – (minus) Min Raw SoVI
 - Estimated Unmet Need + (plus) Resiliency Amount Per Capita

Resulting LIP Distribution PERCENTAGES:

- Distribution Percentage Based on Unmet Need + (plus) Resiliency
- Distribution Percentage Based on 1 + (plus) (Raw SoVI – (minus) Min Raw SoVI))
- Distribution Percentage Based on Per Capita Unmet Needs
- Combined Distribution Percentage Based on Model with 50% (Unmet Need plus Resiliency), 40% (1 + (plus) SoVI – (minus)Min SoVI), and 10% (Unmet Need Per Capita)

A. State Housing Program Allocation

1. State Homeowner Assistance Program Allocation

a. Amount(s)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Homeowner Assistance Program	\$ 32,657,218	\$ 23,281,471	\$ 39,157,082	\$ 55,938,689	50.66%

- b. **Method of Distribution** – Not Applicable
 - i. The Texas General Land Office (GLO) will directly manage and administer the Homeowner Assistance Program for the Golden Crescent Regional Planning Commission (GCRPC) region. Additional information regarding purpose, scope, eligibility, and applying for assistance will be provided by the GLO.
- c. **Reallocation** – Please see Page 75 of 203 of the *State of Texas Plan for Disaster Recovery: Hurricane Harvey – Round 1 (SAP), April 6, 2018*, available at <http://www.glo.texas.gov/recovery/reports/action-plans/index.html>.

2. Local Buyout and Acquisition Program (LBAP) Allocation

a. Amount(s)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647	16.69%

- b. **Method of Distribution Detail** – see Attachment 2 – LBAP MOD Detail.
- c. **Reallocation** – “Reallocation of [LBAP] funds from de-obligated funds and/or cost savings from completed projects will be [at] the discretion of the GLO within the region[.]” Please see Page 79 of 203 of the *SAP), April 6, 2018*, available at <http://www.glo.texas.gov/recovery/reports/action-plans/index.html>.

B. Local Infrastructure Program (LIP) Allocation

a. Amount(s)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589	32.64%

- b. **Method of Distribution Detail** – see Attachment 3 – LIP MOD Detail
- c. **Reallocation** – “Reallocation of [LIP] funds from de-obligated funds and/or cost savings from completed projects will be [at] the discretion of the GLO within the region[.]” Please see Page 87 of 203 of the *SAP, April 6, 2018*, available at <http://www.glo.texas.gov/recovery/reports/action-plans/index.html>.

Attachment 1 – CDBG-DR GCRPC Eligible Entity Distribution Summary

Local Buyout and Acquisition Program (LBAP) Distribution

Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes		
Victoria County (<i>Excluding City of Victoria</i>)		\$ 2,545,545
	<i>City of Victoria</i>	\$ 2,441,508
77979 Calhoun County (<i>Excluding City of Port Lavaca</i>)		\$ 1,858,095
	<i>City of Port Lavaca (77979)</i>	\$ 1,761,429
	80% LBAP Sub-total	\$ 8,606,577
Initial 20% Allocation of Funds for HUD Impacted Counties		
Calhoun County		\$ 2,124,398
De Witt County		\$ 1,952,614
Goliad County		\$ 1,583,333
Gonzales County		\$ 1,667,714
Jackson County		\$ 1,297,010
Lavaca County		\$ 1,199,001
	20% LBAP Sub-Total	\$ 9,824,070
	GCRPC LBAP Grand Total(s)	\$ 18,430,647

Local Infrastructure Program (LIP) Distribution

Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes		
Victoria County (<i>Excluding City of Victoria</i>)		\$3,515,651
	<i>City of Victoria</i>	\$6,056,722
77979 Calhoun County (<i>Excluding City of Port Lavaca</i>)		\$3,740,301
	<i>City of Port Lavaca (77979)</i>	\$5,113,395

LIP Distribution – Continued

Initial 20% Allocation of Funds for HUD Impacted Counties	
Calhoun County (Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)	\$ 2,196,247
	<i>City of Point Comfort</i> \$ 1,031,252
	<i>City of Seadrift</i> \$ 1,536,581
De Witt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	\$ 866,608
	<i>City of Cuero</i> \$ 1,426,977
	<i>City of Yoakum</i> \$ 1,416,383
	<i>City of Yorktown</i> \$ 793,105
Goliad County (Excluding City of Goliad)	\$ 723,030
	<i>City of Goliad</i> \$ 477,108
Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	\$ 903,466
	<i>City of Gonzales</i> \$ 852,300
	<i>City of Nixon</i> \$ 671,903
	<i>City of Smiley</i> \$ 595,907
	<i>City of Waelder</i> \$ 623,785
Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	\$ 840,270
	<i>City of Edna</i> \$ 730,897
	<i>City of Ganado</i> \$ 418,493
	<i>City of La Ward</i> \$ 297,827
Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	\$ 400,454
	<i>City of Hallettsville</i> \$ 279,939
	<i>City of Moulton</i> \$ 263,295
	<i>City of Shiner</i> \$ 272,693

Attachment 4 - LBAP and LIP MOD Data Sources

For more information please contact Michael Ada at michaela@gcrpc.org or call at 361-578-1587 ext. 204

AS OF 7/10/2018

Hurricane Harvey, Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding

Attachment 2 – LBAP MOD Detail

The GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD) allocates available funding in a manner similar to the methodology utilized by the GLO to distribute HUD CDBG-DR funding to regions throughout the affected area.

I. 80% Local Buyout/Acquisition Program Allocation Group Required by HUD in the Federal Register of February 9, 2018, and the GLO in the Draft State Action Plan (SAP).

a. Unmet Need

Unmet need was calculated for each geography (county, city, or ZIP code) using HUD defined damage severity categories and FEMA data on the number of housing units experiencing damage in each of the three damage severity categories, cross classified by county, and cross classified by renter versus homeowner.

i. Homeowner Unmet Need

The HUD method provided the following unmet need multiplier for homeowners in each of the three severity categories:

- Major-Low Damage Severity - \$58,956,
- Major-High Damage Severity - \$72,961, and
- Severe Damage category - \$102,046.

Assuming “Severe” damage corresponded to approximately 100% damage, this allowed translation of the unmet need multipliers in each damage severity category into a Damage to Structure Value (DTSV) percentage estimate for residential units within each category. This helps the distribution methodology account for differing median home values across impacted areas.

The DTSV percentage, or unmet need, was determined for each of the three severity categories in the following manner:

- Major-Low Damage Severity - $\$58,956/\$102,046 = 57.8\%$.
- Major-High Damage Severity - $\$72,961/\$102,046 = 71.5\%$.
- Severe Damage $\$102,046/\$102,046 = 100\%$

These DTSV percentage estimates were then applied to the median price of housing in each county, city, or ZIP code, and multiplied by the count of damaged homeowner occupied properties in each damage severity category to obtain a dollar estimate of unmet needs for homeowners in each county, city, and ZIP code per damage severity category. These are then summed to arrive at estimated total dollars of unmet needs for homeowners in the county, city, or ZIP code.

ii. Renter Unmet Need

Attachment 2 – LBAP MOD Detail

A similar procedure was used for renters. The HUD method provides damage category thresholds for renters based on the renter's FEMA Verified Loss (FVL). FVL is based on a renter's personal property loss. The HUD method does not, however, specify a multiplier for the damage severity categories for renters. Thus, the DTSV percentage estimates used for homeowners were also applied to renter damage severity categories (57.8% for the Major-Low Damage Severity category, 71.5% for the Major-High Damage Severity category, and 100% for the Severe Damage category). For renters, in contrast to using the median value of a damaged home as the basis of the calculation, the construction cost of providing an 861 square foot rental unit with a footprint of 24'x35' was utilized. This construction cost has a nationwide range of \$64,575 to \$86,100 per unit. The midpoint of \$75,337.50 was used to represent the value of a total loss for a rental unit and the percentage in each severity category was applied to this value. The percentage multiplied by the rental unit construction cost values were then multiplied by the count of renters in the severity category to obtain an unmet need value for renters in each of the severity categories. Summing over severity categories yielded an estimate of unmet need to renters in the county, city, or ZIP code. The sum of unmet needs for homeowners and renters represents the total unmet need value for a county, city, or ZIP code.

b. Resiliency

A 15% resiliency factor on unmet needs was added to all counties, cities, ZIP code, and eligible entity entries. The resiliency factor represents enhancements, improvements, or other components integrated into a structure to increase its capacity to respond to, or recover from, a disaster more quickly than if these components had not been integrated.

c. Damage Data – County-ZIP Code Overlap

For counties in the 80% allocation group containing an overlapping county and ZIP code where the county is designated as highly impacted in the Federal Register, 1) ZIP code level data were split into ZIP code-county pairs and 2) the unmet need + (plus) resiliency for the county was combined with the ZIP code county pair data for that county to obtain a single combined entity for the county.

d. Social Vulnerability

Both HUD and the GLO recommended the use of a social vulnerability factor in determining the distribution of CDBG-DR funding. Thus, GCRPC has utilized the same Social Vulnerability Index data utilized by the GLO in its distribution of HUD CDBG-DR funds to the Hurricane Harvey impacted regions in Texas. The raw Social Vulnerability Index indices utilized by the GLO in its distribution of HUD funds to the 49 Hurricane Harvey impacted counties were obtained from Dr. Christopher Emrich at the University of Central Florida, a leading expert in the development of the Social Vulnerability Index (SoVI). Dr. Emrich is the Boardman Endowed Associate Professor of Environmental Science and Public Administration and a member of the National Center for Integrated Coastal Research at the University of Central Florida. Dr. Emrich completed the SoVI computations and supplied the SoVI scores for all of the 49 declared disaster counties to the GLO.

Attachment 2 – LBAP MOD Detail

The Social Vulnerability Index (SoVI), was created by Cutter et al. (Cutter, S. L., Boruff, B. J., & Shirley, W. L. (2003). “Social vulnerability to environmental hazards,” *Social Science Quarterly*, 84(2), 242–261). The idea behind social vulnerability, and its relevance in the context of the distribution methodology presented here, is that social vulnerability arises from certain geographically identifiable population groups who have limited access to political power and resources; have certain physical limitations; or are bound by customs, social capital, beliefs, and characteristics of the built environment (such as density and infrastructure type, building age and stock, etc.). The idea of social vulnerability is that it makes the socially vulnerable people (here, counties, cities, or ZIP codes) more susceptible and less resilient to catastrophic events. Vulnerable groups are less likely to have the ability to respond and recover from catastrophic events on their own. The index is useful to quantify, describe, and understand the social burdens of risks, such as catastrophic natural disasters.

The mathematical development of the original SoVI began by identifying social characteristics consistently seen, in research literature, as contributing to social vulnerability. A literature review process was used by the inventors of SoVI to distill the universe of possible vulnerability measures down to a subset of variables including, wealth, proportion of elderly residents in a county, race, social status variables, Hispanic ethnicity, percent of residents without health insurance, persons with special needs, service industry employment, Native American population, and gender, etc. These variables are entered into a statistical principal component factor analysis resulting in 11 components that explains 76.4% of the variance in social vulnerability relative to the original data set. The resultant SoVI index for a county is a linear combination of the factors derived. The latest SoVI index now uses 29 variables and synthesizes socioeconomic variables obtained from data sources primarily from the United States Census Bureau. A more extensive discussion and presentation of SoVI is given at <http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-0>.

For purposes of these analyses, a SoVI scale was needed to compare social vulnerability across affected eligible entities in the GCRPC region (7 Counties). The SoVI scale utilized for this distribution methodology is a duplicate of the scale used by the GLO. The GLO’s SoVI analysis utilized 48 impacted counties since Harris County was identified for individual funding separately from these analyses.

For the purpose of utilizing the SoVI score as a part of the allocation process, an adjustment of the raw SoVI was needed to produce a positive value. This was accomplished for each eligible entity by subtracting the minimum raw SoVI value among all counties in the region from the particular county SoVI value, and then adding one to the result. This makes all SoVI values greater than or equal to one.

e. Unmet Need Per Capita

An Unmet Need Per Capita factor was calculated to help represent the ability of a county, city, or ZIP code, population to sustain and/or recover from the disaster by raising or utilizing their own funds. This factor also helps account for differences in population between rural and urban areas. For each county, city, or ZIP code the unmet need per capita was calculated by dividing unmet need + (plus) resiliency by the population size.

Attachment 2 – LBAP MOD Detail

f. Distribution of Funds

The allocation of funds to eligible entities involved a weighted combination of 1) the unmet needs per county (or ZIP code), 2) the positive SoVI, and 3) the per capita unmet need for each county (or ZIP code). To facilitate this, a separate distribution percentage was determined for each of these three factors providing the distribution percentages that would be applicable (were this factor the only factor in consideration). These factor distributions in turn were subsequently combined to present a single percentage allocation distribution across all entities. The distributions for the 80% allocation and the 20% allocations were determined separately with the 80% group and the 20% group delineated by the Federal Register and the GLO's Draft State Action Plan. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each eligible entity by taking the county or ZIP code's unmet need plus resiliency score and dividing it by the sum of the unmet need plus resiliency scores over all eligible entities in the 80% allocation group.

Similarly, for the SoVI based distribution percentage of $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$, the $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$ value for the county was divided by the sum of the $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$ scores over all counties in the 80% allocation group which gives the distribution percentage for the positive SoVI scores. Likewise, for the distribution percentage based on unmet needs per capita, the county or ZIP code per capita unmet need plus resiliency for a county or ZIP code was divided by the sum of the unmet need per capita value across all counties and ZIP codes in the 80% allocation group. An analogous process was used for the 20% allocation group of counties only. This methodology determines the percent allocation to each eligible entity that would ensue (were that factor to be the only factor in consideration). That is, the first unmet need factor, determines the percentage allocation distribution that would apply if unmet need were the only factor; the SoVI factor presents the percentage allocation distribution that would apply if social vulnerability of the distressed population were the only factor, etc.

These factor considerations are not viewed in isolation as the three need to be combined to produce a single number. Combining the unmet needs plus resiliency distribution, and the positive SoVI distribution, and the unmet need plus resiliency per capita distribution was achieved by using a 50-40-10 model that takes a weighted combination of the three distributions with 50% weight given to the unmet needs plus resiliency percentage distribution, 40% weight to the positive SoVI distribution, and 10% weight to the per capita unmet need plus resiliency distribution. This 50-40-10 weighting determines a funding allocation percentage for each county by using the Unmet need for the county or city, the SoVI index for the county, and the per capita unmet need for the county/city. A weighting of the three components: Unmet need, SoVI, and Per capita unmet need via the final percentage contribution weighting for each factor of 50%-40%-10% was used in previous disaster relief efforts. The dollar allocation amounts obtained using the 50-40-10 model without imposing any constraints on the amount of funding were calculated using the percentage distribution values for the county or ZIP code to the total dollar amount to be allocated (80% of the available funds in the 80% group and 20% of the funds in the 20% group).

A shortfall column displays the unmet need plus resiliency factor for a county or ZIP code versus the amount they would receive using the unconstrained 50-40-10 model dollar allocation. This

Attachment 2 – LBAP MOD Detail

column presents how much under or over their unmet need the county or ZIP codes is by using the unconstrained 50-40-10 weighting allocation process.

The GLO's State Action Plan dictates that there be a minimum allocation amount for eligible entities since it is costly to apply for funding and to create the policies, administrative procedures, and personnel to implement the processing and distribution of the HUD funds. This minimum allocation amount, or floor, was set at \$1,000,000 and applied to all allocation decisions in the Local Buyout and Acquisition Program spreadsheet for both the 80% allocation and 20% allocation groups.

~~Over allocating funds to a county far beyond their unmet needs is not reasonable, especially if other counties have not yet received their unmet need. Accordingly, a maximum allocation amount constraint is imposed with a cap being set at 100% of the unmet need plus resiliency amount for the funding of counties. These two numbers (cap and floor) provide constraints on the funding an eligible entity can receive in a given allocation. If an eligible entity reached its maximum allocation, then any funds ascribed to them by the 50-40-10 rule, above and beyond their maximum, were available for reallocation and distribution to other counties or ZIP codes not having reached their maximum. In order to achieve an equitable distribution of the limited funding provided, final allocation amounts reflect the sum of the \$1,000,000 floor plus the sum of the percentage distribution based on the 50-40-10 model; without reference to the "Allocation Amount Using the 50-40-10 Model Without Imposed Distributional Constraints" column. This provides all eligible entities with an allocation that reduces "Unmet Need Plus Resiliency Removing Any Overlap" totals in a more holistic, or regional, manner.~~

This ~~reallocation~~ process methodology will be performed in a sequential ~~process manner for~~ any future CDBG-DR allocations with each round's final allocation amount reducing the "Unmet Need Plus Resiliency Removing Any Overlap" amount for each eligible entity.

As the spreadsheet shows, all eligible entities in the 80% allocation group did not reach their ~~maximum~~ "Unmet Need Plus Resiliency Removing Any Overlap" amount in the first allocation.

Regarding the future CDBG-DR funding distribution process, as was done for the first distribution, an allocative percentage distribution had to be developed to apply to the amount available for distribution in order to direct the fund allocation. Here, however, zero percent additional allocation was given to those entities (counties or ZIP codes) that had already obtained their maximum allocation according to the formula. To achieve additional future allocations, the original 50-40-10 distribution probabilities for the counties that had not yet reached their maximum were renormalized to create an allocative percentage distribution for future funding. This was done by dividing the original percentages by the sum of the percentages of the areas remaining below their cap, with the goal of allocating 100% of unmet need in future funding allocations if possible.

g. Overlap – Avoiding Double Allocation

Since funding was required to be allocated amongst counties, cities, a ZIP code, and other entities with eminent domain authority; and because overlap exists between an 80% allocation county or a 20% allocation county, care had to be taken to avoid the structural issue of double allocation

Attachment 2 – LBAP MOD Detail

(double counting) due to overlap. Any overlap had to be subtracted out from the county to avoid over counting.

This process involved using the actual ZIP Code specific damage data and breaking the data into ZIP code/county pairs. The county population total was also adjusted to remove any population of the county that had already been counted in the ZIP code population. This process eliminated double counting when there was overlap in county, city, and ZIP data. This process was used for all overlaps. The same process was used to remove the effect of overlap of ZIP code allocation and county allocation in the 20% impacted allocation subgroup.

20% Local Buyout/Acquisition Program Allocation Group Required by HUD in the Federal Register of February 9, 2018, and the GLO in the Draft SAP.

The process for the 20% State Homeowner Assistance Program and Local Buyout/Acquisition Program allocation counties was the same as described for the 80% allocation to eligible entities. Namely a minimum allocation amount was first determined and then any residual funds were allocated in future allocations with maximum allocations imposed at each additional allocation. The minimum allocation amount for the 20% Local Buyout/Acquisition required a reasonable determination for that group separately as there was not enough money available to give all 62 entities a minimum of \$1,000,000. This was accomplished by using a buildup approach that intends to incorporate 1) necessary administration costs for a buyout, 2) unmet needs for impacted entities, and 3) the likely buyout percentage of houses in impacted entity areas for the 20% Local Buyout/Acquisition group.

Under the GLO's Draft SAP, known administrative costs are the sum of estimated program (2%) and project (10%) administrative costs equaling 12% of the money in a buyout grant award (total grant award). This is the basis for the \$1,000,000 minimum distribution to each eligible entity. The county with the largest unmet need in this group is Calhoun County with \$3,686,209 of unmet need. Calhoun County also has the largest number of damaged residences (55 total) and the largest total number of properties in the Major-High and Severe Damage categories (19 total).

The distribution methodology for the 20% Allocation group allocated amounts below the minimum required allocation to eligible entities (\$1,000,000 per entity) due to the high number of eligible entities (Total of 62 eligible entities) and the amount of funds allocated to GCRPC for the Local Buyout and Acquisition Program (\$9,824,070). The GCRPC region would require a minimum funding allocation of \$62,000,000, for the Local Buyout and Acquisition Program alone, in order to meet the GLO's minimum funding requirements.

Additional allocation ~~restrictions-methods~~ required consideration as a result of the minimum required allocation and the number of eligible entities. An allocation that adheres to HUD and GLO requirements was achieved for the 20% Allocation group by limiting the regional allocation, ~~for the 20% Allocation group,~~ to only eligible counties, ~~while still~~ and providing for the continued LBAP eligibility of cities and eminent domain authority entities through partnerships with eligible counties, ~~an allocation that adheres to HUD and GLO requirements was achieved.~~

Attachment 2 – LBAP MOD Detail

As previously stated, in order to achieve an equitable distribution of the limited funding provided, final allocation amounts reflect the sum of the \$1,000,000 floor plus the sum of the percentage distribution based on the 50-40-10 model; without reference to the “Allocation Amount Using the 50-40-10 Model Without Imposed Distributional Constraints” column. This provides all eligible entities with an allocation that reduces “Unmet Need Plus Resiliency Removing Any Overlap” totals in a more holistic, or regional, manner.

This allocation methodology will be performed in a sequential manner for any future CDBG-DR allocations with each round’s final allocation amount reducing the “Unmet Need Plus Resiliency Removing Any Overlap” amount for each eligible entity. As the spreadsheet shows, all eligible entities in the 20% allocation group did not reach their “Unmet Need Plus Resiliency Removing Any Overlap” amount in the first allocation.

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Hurricane Harvey

Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding

Attachment 3 – LIP MOD Detail

The GCRPC Local Infrastructure Program (LIP) Method of Distribution (MOD) allocates available funding in a manner similar to the methodology utilized by the GLO to distribute HUD CDBG-DR funding to regions throughout the affected area.

I. LIP MOD for the 80/20% LIP Allocation Groups as Required by HUD in the Federal Register of February 9, 2018, and the GLO in the Draft State Action Plan (SAP).

a. Public Assistance

A Public Assistance factor was generated in order to provide each entity with a minimum funding requirement to address potential local infrastructure projects. This factor is represented by the sum of all Public Assistance requests for an eligible entity.

b. Unmet Need

Unmet need was calculated using a 10% matching requirement of total project costs. The matching requirement percentage is based on the 90/10 cost sharing requirement for FEMA Public Assistance Funding.

c. Resiliency

A resiliency factor was calculated as 15% of total project costs. The resiliency factor represents the enhancements, improvements, or other components integrated into a structure to increase its capacity to respond to, or recover from, a disaster more quickly than if these components had not been integrated.

d. Social Vulnerability

Both HUD and the GLO recommended the use of a social vulnerability factor in determining the distribution of CDBG-DR funding. Thus, GCRPC has utilized the same Social Vulnerability Index data utilized by the GLO in its distribution of HUD CDBG-DR funds to the Hurricane Harvey impacted regions in Texas. The raw Social Vulnerability Index indices utilized by the GLO in its distribution of HUD funds to the 49 Hurricane Harvey impacted counties were obtained from Dr. Christopher Emrich at the University of Central Florida, a leading expert in the development of the Social Vulnerability Index (SoVI). Dr. Emrich is the Boardman Endowed Associate Professor of Environmental Science and Public Administration and a member of the National Center for Integrated Coastal Research at the University of Central Florida. Dr. Emrich completed the SoVI computations and supplied the SoVI scores for all of the 49 declared disaster counties to the GLO.

The Social Vulnerability Index (SoVI), was created by Cutter et al. (Cutter, S. L., Boruff, B. J., & Shirley, W. L. (2003). "Social vulnerability to environmental hazards," *Social Science Quarterly*, 84(2), 242–261). The idea behind social vulnerability, and its relevance in the context of the distribution methodology presented here, is that social vulnerability arises from certain geographically identifiable population groups who have limited access to political power and

resources; have certain physical limitations; or are bound by customs, social capital, beliefs, and characteristics of the built environment (such as density and infrastructure type, building age and stock, etc.). The idea of social vulnerability is that it makes the socially vulnerable people (here, counties, cities, or ZIP codes) more susceptible and less resilient to catastrophic events. Vulnerable groups are less likely to have the ability to respond and recover from catastrophic events on their own. The index is useful to quantify, describe, and understand the social burdens of risks, such as catastrophic natural disasters.

The mathematical development of the original SoVI began by identifying social characteristics consistently seen, in research literature, as contributing to social vulnerability. A literature review process was used by the inventors of SoVI to distill the universe of possible vulnerability measures down to a subset of variables including, wealth, proportion of elderly residents in a county, race, social status variables, Hispanic ethnicity, percent of residents without health insurance, persons with special needs, service industry employment, Native American population, and gender, etc.. These variables are entered into a statistical principal component factor analysis resulting in 11 components that explains 76.4% of the variance in social vulnerability relative to the original data set. The resultant SoVI index for a county is a linear combination of the factors derived. The latest SoVI index now uses 29 variables and synthesizes socioeconomic variables obtained from data sources primarily from the United States Census Bureau. A more extensive discussion and presentation of SoVI is given at <http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-0>.

For purposes of these analyses, a SoVI scale was needed to compare social vulnerability across affected eligible entities in the GCRPC region (7 Counties). The SoVI scale utilized for this distribution methodology is a duplicate of the scale used by the GLO. The GLO's SoVI analysis utilized 48 impacted counties since Harris County was identified for individual funding separately from these analyses.

For the purpose of utilizing the SoVI score as a part of the allocation process, an adjustment of the raw SoVI was needed to produce a positive value. This was accomplished for each eligible entity by subtracting the minimum raw SoVI value among all counties in the region from the particular county SoVI value, and then adding one to the result. This makes all SoVI values greater than or equal to one.

e. Unmet Need Per Capita

An Unmet Need Per Capita factor was calculated to help represent the ability of a county or city population to sustain and/or recover from the disaster by raising or utilizing their own funds. This factor also helps account for differences in population between rural and urban areas. For each county or city, the unmet need per capita was calculated by dividing the unmet need amount (plus resiliency factor) developed by severity level by the population size.

f. Distribution of Funds

The allocation of funds involved a weighted combination of 1) the unmet needs per county or city, 2) the positive SoVI, and 3) the per capita unmet need for each county. To facilitate this a separate distribution percentage was determined for each of these three factors which were subsequently combined for a single distribution percentage across all eligible counties/cities.

The initial distributions for the 80% allocation (HUD Most Impacted Counties) and the 20% allocations (Impacted Counties and Most Impacted ZIP Codes) were determined through the guidance provided by the Federal Register and the GLO SAP. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each entity by taking 1) the county unmet need plus (+) resiliency and dividing (/) it by 2) the sum of the unmet need plus resiliency over all eligible entities in the 80% allocation group. Similarly, for the SoVI based distribution percentage of $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$, the $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$ value for the county was divided by 2) the sum of the $1 + (\text{Raw SoVI} - \text{Min}(\text{Raw SoVI}))$ values over all counties in the 80% allocation group which gives the distribution percentage for the positive SoVI scores. Finally, for the distribution percentage based on unmet needs per capita, the 1) county per capita unmet need plus (+) resiliency for a county was divided (/) by 2) the sum of the unmet need per capita value across all counties in the HUD Impacted Counties/Cities 80% allocation group for Local Infrastructure Program (LIP) funding. An analogous process was used for the HUD Impacted Counties/Cities 20% allocation group for LIP funding.

Integration of these distribution percentages (1. Unmet Needs Plus Resiliency, 2. Positive SoVI, and 3. Per Capita Unmet Need Plus Resiliency) was achieved by using a 50-40-10 model that takes a weighted combination of the three distributions percentages: 50% weight given to Unmet Needs Plus Resiliency, 40% weight to Positive SoVI, and 10% weight to Per Capita Unmet Need Plus Resiliency. This 50-40-10 weighting determines a final distribution percentage for each eligible entity by using the same county data utilized by HUD and the GLO to allocate funding to regions in the affected area.

Minimum allocation amounts, using the 50-40-10 model without imposing any additional constraints on the amount of HUD funding, were obtained by applying the percentage distribution values for each eligible entity to the total dollar amount to be allocated (80% of the available funds in the 80% group (HUD Most Impacted Counties, Cities, and Zip Codes) and 20% of the funds in the 20% group (Impacted Counties and Cities)). A shortfall (or surplus) amount was calculated to represent an entities unmet needs plus resiliency allocation versus the amount they would receive using the unconstrained 50-40-10 model dollar allocation.

The GLO SAP requires a minimum allocation amount (\$100,000) for eligible entities to assist entities with costs associated to 1) applying for LIP funding, 2) creating LIP policies and procedures, and hiring/maintaining personnel to implement the processing and distribution of allocated LIP funds.

In order to avoid over-allocating funds to an eligible entity (beyond their unmet need requirement), a maximum allocation amount constraint was imposed with a cap being set at 100% of the Unmet Needs Plus Resiliency amount for the funding of eligible entities if all eligible entities in the group have not yet received their Unmet Need Plus Resiliency allocation amount. These two numbers (cap and floor) provide constraints on the funding an eligible entity can receive in a given allocation. If an eligible entity reached the higher of the minimum distribution or the maximum allocation, any surplus funds were made available for reallocation and distribution to other eligible entities. This reallocation process was performed in a sequential process of surplus allocations, however, funding allocated to the GCRPC region was inadequate for all eligible entities to receive a minimum distribution of 100% of Unmet Need Plus Resiliency.

Allocation Summary Spreadsheet

Hurricane Harvey
Regional Method of Distribution Allocation Summary

COG: GOLDEN CRESCENT REGIONAL PLANNING COMMISSION (GCRPC)

Required	Local Buyout and Acquisition Program		Local Infrastructure Program		Total	Required	Required
	Required	Required	Required	Required	Required		
City, County or Eligible Entity	Allocation	Percentage of Allocation	Allocation	Percentage of Allocation	Total Allocation	Percentage of Total Regional Allocation	70% Low-to-Moderate Income Benefit Requirement
Victoria County (Excluding City of Victoria)	\$ 2,545,545	13.81%	\$ 3,515,651	9.75%	\$ 6,061,196	11.13%	\$ 4,242,837
City of Victoria	\$ 2,441,508	13.25%	\$ 6,056,722	16.80%	\$ 8,498,230	15.60%	\$ 5,948,761
77979 Calhoun County (Excl)	\$ 1,858,095	10.08%	\$ 3,740,301	10.38%	\$ 5,598,396	10.28%	\$ 3,918,877
City of Port Lavaca (77979)	\$ 1,761,429	9.56%	\$ 5,113,395	14.19%	\$ 6,874,824	12.62%	\$ 4,812,377
Calhoun County	\$ 2,124,398	11.53%	\$ 2,196,247	6.09%	\$ 4,320,646	7.93%	\$ 3,024,452
City of Point Comfort	\$ -	0.00%	\$ 1,031,252	2.86%	\$ 1,031,252	1.89%	\$ 721,877
City of Seadrift	\$ -	0.00%	\$ 1,536,581	4.26%	\$ 1,536,581	2.82%	\$ 1,075,607
DeWitt County	\$ 1,952,614	10.59%	\$ 866,608	2.40%	\$ 2,819,222	5.18%	\$ 1,973,455
City of Cuero	\$ -	0.00%	\$ 1,426,977	3.96%	\$ 1,426,977	2.62%	\$ 998,884
City of Yoakum	\$ -	0.00%	\$ 1,416,383	3.93%	\$ 1,416,383	2.60%	\$ 991,468
City of Yorktown	\$ -	0.00%	\$ 793,105	2.20%	\$ 793,105	1.46%	\$ 555,174
Goliad County	\$ 1,583,333	8.59%	\$ 723,030	2.01%	\$ 2,306,363	4.23%	\$ 1,614,454
City of Goliad	\$ -	0.00%	\$ 477,108	1.32%	\$ 477,108	0.88%	\$ 333,975
Gonzales County	\$ 1,667,714	9.05%	\$ 903,466	2.51%	\$ 2,571,181	4.72%	\$ 1,799,826
City of Gonzales	\$ -	0.00%	\$ 852,300	2.36%	\$ 852,300	1.56%	\$ 596,610
City of Nixon	\$ -	0.00%	\$ 671,903	1.86%	\$ 671,903	1.23%	\$ 470,332
City of Smiley	\$ -	0.00%	\$ 595,907	1.65%	\$ 595,907	1.09%	\$ 417,135
City of Waelder	\$ -	0.00%	\$ 623,785	1.73%	\$ 623,785	1.15%	\$ 436,649
Jackson County	\$ 1,297,010	7.04%	\$ 840,270	2.33%	\$ 2,137,279	3.92%	\$ 1,496,096
City of Edna	\$ -	0.00%	\$ 730,897	2.03%	\$ 730,897	1.34%	\$ 511,628
City of Ganado	\$ -	0.00%	\$ 418,493	1.16%	\$ 418,493	0.77%	\$ 292,945
City of La Ward	\$ -	0.00%	\$ 297,827	0.83%	\$ 297,827	0.55%	\$ 208,479
Lavaca County	\$ 1,199,001	6.51%	\$ 400,454	1.11%	\$ 1,599,456	2.94%	\$ 1,119,619
City of Hallettsville	\$ -	0.00%	\$ 279,939	0.78%	\$ 279,939	0.51%	\$ 195,957
City of Moulton	\$ -	0.00%	\$ 263,295	0.73%	\$ 263,295	0.48%	\$ 184,306
City of Shiner	\$ -	0.00%	\$ 272,693	0.76%	\$ 272,693	0.50%	\$ 190,885
	\$18,430,647	100.00%	\$36,044,589	100.00%	\$ 54,475,236	100.00%	\$ 38,132,665
	Percentage of Total Allocation:	33.83%	66.17%		Low-to-Moderate Income Benefit Requirement	70%	\$ -

Hurricane Harvey
Regional Method of Distribution Allocation
GCRPC - Buyout Acquisition Factors - 80% Most Impacted Areas
Summary

City, County or Eligible Entity	First Distribution Factor: Unmet Need plus Resiliency			Second Distribution Factor: Social Vulnerability			Third Distribution Factor: Per Capita Unmet Need			Proportional Weighted Factor (PWF)	Housing - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD	Distribution Floor	Total Distribution
	SUM of 100%			SUM of 100%			SUM of 100%							
	Factor Weight: 50%			Factor Weight: 40%			Factor Weight: 10%							
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)					
Victoria County <i>(Excluding City of Victoria)</i>	42.93%	50%	0.21	20.83%	40%	0.08	37.52%	10%	0.04	34%	\$ 4,606,577	\$ 1,545,545	\$ 1,000,000	\$ 2,545,545
City of Victoria	42.93%	50%	0.21	20.83%	40%	0.08	14.94%	10%	0.01	31%	\$ 4,606,577	\$ 1,441,508	\$ 1,000,000	\$ 2,441,508
77979 Calhoun County <i>(Excluding City of Port Lavaca)</i>	7.07%	50%	0.04	29.17%	40%	0.12	34.26%	10%	0.03	19%	\$ 4,606,577	\$ 858,095	\$ 1,000,000	\$ 1,858,095
City of Port Lavaca (77979)	7.07%	50%	0.04	29.17%	40%	0.12	13.28%	10%	0.01	17%	\$ 4,606,577	\$ 761,429	\$ 1,000,000	\$ 1,761,429
SUM	100%			100%			100%							
Proportion Total Total:										100%		\$ 4,606,577	\$ 4,000,000	\$ 8,606,577

Hurricane Harvey
Regional Method of Distribution Allocation
GCRPC - Buyout Acquisition Factors - 20% Impacted Areas
Summary

City, County or Eligible Entity	First Distribution Factor: Unmet Need plus Resiliency			Second Distribution Factor: Social Vulnerability			Third Distribution Factor: Per Capita Unmet Need			Proportional Weighted Factor (PWF)	Housing - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD	Distribution Floor	Total Distribution
	SUM of		100	SUM of		100	SUM of		100					
	Factor Weight: 50%			Factor Weight: 40%			Factor Weight: 10%							
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)					
Calhoun County	39	50%	0.20	8	40%	0.03	29	10%	0.03	26%	\$ 3,824,070	\$ 991,375	\$ 1,000,000	\$ 1,991,375
DeWitt County	23	50%	0.12	31	40%	0.12	25	10%	0.02	27%	\$ 3,824,070	\$ 1,013,480	\$ 1,000,000	\$ 2,013,480
Goliad County	16	50%	0.08	14	40%	0.05	15	10%	0.02	15%	\$ 3,824,070	\$ 575,504	\$ 1,000,000	\$ 1,575,504
Gonzales County	11	50%	0.05	29	40%	0.12	17	10%	0.02	19%	\$ 3,824,070	\$ 718,270	\$ 1,000,000	\$ 1,718,270
Jackson County	8	50%	0.04	9	40%	0.03	8	10%	0.01	8%	\$ 3,824,070	\$ 310,584	\$ 1,000,000	\$ 1,310,584
Lavaca County	3	50%	0.01	9	40%	0.04	5	10%	0.01	6%	\$ 3,824,070	\$ 214,858	\$ 1,000,000	\$ 1,214,858
SUM	100			100			100							
Proportion Total Total:										100%		\$ 3,824,070	\$ 6,000,000	\$ 9,824,070

Hurricane Harvey
Regional Method of Distribution Allocation
GCRPC - Infrastructure Factors - 80% Most Impacted Areas
Summary

City or County	First Distribution Factor: Unmet Need plus Resiliency			Second Distribution Factor: Social Vulnerability			Third Distribution Factor: Per Capita Unmet Need			Proportional Weighted Factor (PWF)	Infrastructure - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD	Distribution Floor	Total Distribution
	SUM of 100%			SUM of 100%			SUM of 100%							
	Factor Weight: 50%			Factor Weight: 40%			Factor Weight: 10%							
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)					
Victoria County <i>(Excluding City of Victoria)</i>	18.64%	50%	0.09	21%	40%	0.08	13%	10%	0.01	19%	\$ 18,026,069	\$ 3,415,651	\$ 100,000	\$ 3,515,651
City of Victoria	46.84%	50%	0.23	21%	40%	0.08	13%	10%	0.01	33%	\$ 18,026,069	\$ 5,956,722	\$ 100,000	\$ 6,056,722
77979 Calhoun County <i>(Excluding City of Port Lavaca)</i>	9.64%	50%	0.05	29%	40%	0.12	37%	10%	0.04	20%	\$ 18,026,069	\$ 3,640,301	\$ 100,000	\$ 3,740,301
City of Port Lavaca <i>(77979)</i>	24.88%	50%	0.12	29%	40%	0.12	37%	10%	0.04	28%	\$ 18,026,069	\$ 5,013,395	\$ 100,000	\$ 5,113,395
SUM	100%			100%			100%							
Proportion Total Total:										100%		\$ 18,026,069	\$ 400,000	\$ 18,426,069

Hurricane Harvey
Regional Method of Distribution Allocation
GCRPC - Infrastructure Factors - 20% Impacted Areas
Summary

City or County	First Distribution Factor: Unmet Need plus Resiliency			Second Distribution Factor: Social Vulnerability			Third Distribution Factor: Per Capita Unmet Need			Proportional Weighted Factor (PWF)	Infrastructure - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD	Distribution Floor	Total Distribution
	SUM of 100%			SUM of 100%			SUM of 100%							
	Factor Weight: 50%			Factor Weight: 40%			Factor Weight: 10%							
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)					
Calhoun County	21.26%	50%	0.11	2.08%	40%	0.01	21%	10%	0.02	14%	\$ 15,418,520	\$ 2,096,247	\$ 100,000	\$ 2,196,247
City of Point Comfort	6.15%	50%	0.03	2.08%	40%	0.01	21%	10%	0.02	6%	\$ 15,418,520	\$ 931,252	\$ 100,000	\$ 1,031,252
City of Seadrift	12.71%	50%	0.06	2.08%	40%	0.01	21%	10%	0.02	9%	\$ 15,418,520	\$ 1,436,581	\$ 100,000	\$ 1,536,581
DeWitt County	2.98%	50%	0.01	7.90%	40%	0.03	3%	10%	0.00	5%	\$ 15,418,520	\$ 766,608	\$ 100,000	\$ 866,608
City of Cuero	10.25%	50%	0.05	7.90%	40%	0.03	3%	10%	0.00	9%	\$ 15,418,520	\$ 1,326,977	\$ 100,000	\$ 1,426,977
City of Yoakum	10.11%	50%	0.05	7.90%	40%	0.03	3%	10%	0.00	9%	\$ 15,418,520	\$ 1,316,383	\$ 100,000	\$ 1,416,383
City of Yorktown	2.03%	50%	0.01	7.90%	40%	0.03	3%	10%	0.00	4%	\$ 15,418,520	\$ 693,105	\$ 100,000	\$ 793,105
Goliad County	4.83%	50%	0.02	3.49%	40%	0.01	2%	10%	0.00	4%	\$ 15,418,520	\$ 623,030	\$ 100,000	\$ 723,030
City of Goliad	1.64%	50%	0.01	3.49%	40%	0.01	2%	10%	0.00	2%	\$ 15,418,520	\$ 377,108	\$ 100,000	\$ 477,108
Gonzales County	4.29%	50%	0.02	7.34%	40%	0.03	1%	10%	0.00	5%	\$ 15,418,520	\$ 803,466	\$ 100,000	\$ 903,466
City of Gonzales	3.63%	50%	0.02	7.34%	40%	0.03	1%	10%	0.00	5%	\$ 15,418,520	\$ 752,300	\$ 100,000	\$ 852,300
City of Nixon	1.29%	50%	0.01	7.34%	40%	0.03	1%	10%	0.00	4%	\$ 15,418,520	\$ 571,903	\$ 100,000	\$ 671,903
City of Smiley	0.31%	50%	0.00	7.34%	40%	0.03	1%	10%	0.00	3%	\$ 15,418,520	\$ 495,907	\$ 100,000	\$ 595,907
City of Waelder	0.67%	50%	0.00	7.34%	40%	0.03	1%	10%	0.00	3%	\$ 15,418,520	\$ 523,785	\$ 100,000	\$ 623,785
Jackson County	7.29%	50%	0.04	2.22%	40%	0.01	3%	10%	0.00	5%	\$ 15,418,520	\$ 740,270	\$ 100,000	\$ 840,270
City of Edna	5.87%	50%	0.03	2.22%	40%	0.01	3%	10%	0.00	4%	\$ 15,418,520	\$ 630,897	\$ 100,000	\$ 730,897
City of Ganado	1.82%	50%	0.01	2.22%	40%	0.01	3%	10%	0.00	2%	\$ 15,418,520	\$ 318,493	\$ 100,000	\$ 418,493
City of La Ward	0.25%	50%	0.00	2.22%	40%	0.01	3%	10%	0.00	1%	\$ 15,418,520	\$ 197,827	\$ 100,000	\$ 297,827
Lavaca County	1.90%	50%	0.01	2.41%	40%	0.01	0%	10%	0.00	2%	\$ 15,418,520	\$ 300,454	\$ 100,000	\$ 400,454
City of Hallettsville	0.34%	50%	0.00	2.41%	40%	0.01	0%	10%	0.00	1%	\$ 15,418,520	\$ 179,939	\$ 100,000	\$ 279,939
City of Moulton	0.12%	50%	0.00	2.41%	40%	0.01	0%	10%	0.00	1%	\$ 15,418,520	\$ 163,295	\$ 100,000	\$ 263,295
City of Shiner	0.24%	50%	0.00	2.41%	40%	0.01	0%	10%	0.00	1%	\$ 15,418,520	\$ 172,693	\$ 100,000	\$ 272,693
SUM	100%			100%			100%							
Proportion Total Total:										100%	\$ 15,418,520		\$ 2,200,000	\$ 17,618,520

GCRPC Regional Funding

REGIONAL CDBG-DR METHOD OF DISTRIBUTION ALLOCATION SUMMARY

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647	33.83%
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589	66.17%
Total Regional Allocation				\$ 54,475,236	

CDBG-DR Program Funding Requiring Regional Methods of Distribution

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647	33.83%

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Regional Allocation
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589	66.17%

GCRPC LBAP MOD Allocation Summary

		Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes		
#	COG		70% LMI	
1	GCRPC	Victoria County <i>(Excluding City of Victoria)</i>	\$ 2,545,545	\$ 1,781,881
2	GCRPC	<i>City of Victoria</i>	\$ 2,441,508	\$ 1,709,055
3	GCRPC	77979 Calhoun County <i>(Excluding City of Port Lavaca)</i>	\$ 1,858,095	\$ 1,300,667
4	GCRPC	<i>City of Port Lavaca (77979)</i>	\$ 1,761,429	\$ 1,233,000
80% LBAP Sub-total			\$ 8,606,577	\$ 6,024,604

		Initial 20% Allocation of Funds for HUD Impacted Counties		
#	COG		70% LMI	
5	GCRPC	Calhoun County	\$ 2,124,398	\$ 1,487,079
6	GCRPC	DeWitt County	\$ 1,952,614	\$ 1,366,830
7	GCRPC	Goliad County	\$ 1,583,333	\$ 1,108,333
8	GCRPC	Gonzales County	\$ 1,667,714	\$ 1,167,400
9	GCRPC	Jackson County	\$ 1,297,010	\$ 907,907
10	GCRPC	Lavaca County	\$ 1,199,001	\$ 839,301
20% LBAP Sub-Total			\$ 9,824,070	\$ 6,876,849

GCRPC LBAP Grand Total(s) \$ 18,430,647 \$ 12,901,453

As of: 7/10/2018

GCRPC LBAP MOD Allocation Summary

#	COG	Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes	70% LMI	
1	GCRPC	Victoria County (Excluding City of Victoria)	\$ 2,545,545	\$ 1,781,881
2	GCRPC	City of Victoria	\$ 2,441,508	\$ 1,709,055
3	GCRPC	Victoria ISD (Grand Total County minus Nursery ISD)	\$ -	\$ -
4	GCRPC	Nursery Independent School District	\$ -	\$ -
5	GCRPC	Victoria County Junior College District (Enrollment 2016/17)	\$ -	\$ -
6	GCRPC	Victoria Electric Cooperative, Inc. (Residential Meters)	\$ -	\$ -
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	\$ 1,858,095	\$ 1,300,667
8	GCRPC	Calhoun County Independent School District (City of Port Lavaca and 77979)	\$ -	\$ -
9	GCRPC	South Central Calhoun County Water Control & Improvement District #1	\$ -	\$ -
10	GCRPC	City of Port Lavaca (77979)	\$ 1,761,429	\$ 1,233,000
11	GCRPC	La Salle Water Control & Improvement District #1A	\$ -	\$ -
		80% LBAP Sub-total	\$ 8,606,577	\$ 6,024,604

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	70% LMI	
12	GCRPC	Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	\$ 2,124,398	\$ 1,487,079
13	GCRPC	City of Point Comfort	\$ -	\$ -
14	GCRPC	Calhoun Port Authority	\$ -	\$ -
15	GCRPC	Lavaca Pipe Line Company	NA	
16	GCRPC	City of Seadrift	\$ -	\$ -
17	GCRPC	Port O'Conner Improvement District	\$ -	\$ -
18	GCRPC	Westside Calhoun County Navigation District	\$ -	\$ -
19	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	\$ 1,952,614	\$ 1,366,830
20	GCRPC	City of Cuero	\$ -	\$ -
21	GCRPC	Cuero Economic Corporation	\$ -	\$ -
22	GCRPC	Cuero Housing Authority	\$ -	\$ -
23	GCRPC	Cuero Independent School District	\$ -	\$ -
24	GCRPC	Dewitt County Drainage District No.1	\$ -	\$ -
25	GCRPC	Pecan Valley Groundwater Conservation District	\$ -	\$ -
26	GCRPC	City of Yoakum	\$ -	\$ -
27	GCRPC	Yoakum Hospital District	\$ -	\$ -
28	GCRPC	Yoakum Housing Authority	\$ -	\$ -
29	GCRPC	Yoakum Independent School District	\$ -	\$ -
30	GCRPC	City of Yorktown	\$ -	\$ -
31	GCRPC	Yorktown Housing Authority	\$ -	\$ -
32	GCRPC	Yorktown Independent School District	\$ -	\$ -
33	GCRPC	Goliad County (Excluding City of Goliad)	\$ 1,583,333	\$ 1,108,333
34	GCRPC	City of Goliad	\$ -	\$ -
35	GCRPC	Goliad County Groundwater Conservation District	\$ -	\$ -
36	GCRPC	Goliad Economic Development Corporation	\$ -	\$ -
37	GCRPC	Goliad Housing Authority	\$ -	\$ -
38	GCRPC	Goliad Independent School District	\$ -	\$ -
39	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	\$ 1,667,714	\$ 1,167,400
40	GCRPC	City of Gonzales	\$ -	\$ -
41	GCRPC	Gonzales County Underground Water Conservation District	\$ -	\$ -
42	GCRPC	Gonzales County Water Supply Corporation	\$ -	\$ -
43	GCRPC	Gonzales Healthcare Systems	\$ -	\$ -
44	GCRPC	Gonzales Independent School District	\$ -	\$ -
45	GCRPC	Guadalupe Valley Electric Cooperative, Inc.	\$ -	\$ -
46	GCRPC	City of Nixon	\$ -	\$ -
47	GCRPC	Nixon-Smiley Consolidated Independent School District	\$ -	\$ -
48	GCRPC	City of Smiley	\$ -	\$ -
49	GCRPC	City of Waelder	\$ -	\$ -
50	GCRPC	Waelder Independent School District	\$ -	\$ -
51	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	\$ 1,297,010	\$ 907,907
52	GCRPC	City of Edna	\$ -	\$ -
53	GCRPC	Edna Independent School District	\$ -	\$ -
54	GCRPC	Jackson County Navigation District	\$ -	\$ -
55	GCRPC	Lavaca-Navidad River Authority	\$ -	\$ -
56	GCRPC	City of Ganado	\$ -	\$ -
57	GCRPC	Ganado Independent School District	\$ -	\$ -
58	GCRPC	Ganado Telephone Co, Inc.	NA	
59	GCRPC	Jackson Electric Coopoerative, Inc.	\$ -	\$ -
60	GCRPC	YK Communications	NA	
61	GCRPC	City of La Ward	\$ -	\$ -
62	GCRPC	La Ward Telephone Exchange, Inc.	NA	
63	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	\$ 1,199,001	\$ 839,301
64	GCRPC	City of Hallettsville	\$ -	\$ -
65	GCRPC	Ezzell Independent School District	\$ -	\$ -
66	GCRPC	Hallettsville 4A Manufacturing Development Corporation	\$ -	\$ -
67	GCRPC	Hallettsville 4B Business Development Corporation	\$ -	\$ -
68	GCRPC	Hallettsville Independent School District	\$ -	\$ -
69	GCRPC	Vysehrad Independent School District	\$ -	\$ -
70	GCRPC	City of Moulton	\$ -	\$ -
71	GCRPC	Moulton Independent School District	\$ -	\$ -
72	GCRPC	City of Shiner	\$ -	\$ -
73	GCRPC	Shiner Independent School District	\$ -	\$ -
		20% LBAP Sub-Total	\$ 9,824,070	\$ 6,876,849

GCRPC LBAP Grand Total(s) \$ 18,430,647 \$ 12,901,453

As of: 8/6/2018

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

HUD Total LBAP Funding to Allocate	\$18,430,647	
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000	\$ 4,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577	HUD Most Impacted Counties and Zi
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577	

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Median \$ Value of Housing Units for Homeowners/ Median Value of Constructing Rental Unit for Renters	FEMA Verified Count of Unmet Need--Major-Low Damage Severity	FEMA Verified Count of Unmet Need--Major-High Damage Severity	FEMA Verified Count of Unmet Need--Severe Damage	Total FEMA Verified Count of Unmet Need Units	Unmet Need \$ Amount Derived Using Severity Levels
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328		382	178	44	604	38,728,213
		Homeowner		124,100	184	76	28	288	23,410,553
		Renter		75,338	198	102	16	316	15,317,660
2	GCRPC	City of Victoria	66139		382	178	44	604	38,728,213
		Homeowner		124,100	184	76	28	288	23,410,553
		Renter		75,338	198	102	16	316	15,317,660
7	GCRPC	77979 Calhoun County (Excluding City of Port Lava	4747		68	21	9	98	6,376,835
		Homeowner		116429	42	11	7	60	4,555,850
		Renter		75,338	26	10	2	38	1,820,986
10	GCRPC	City of Port Lavaca (77979)	12248		68	21	9	98	6,376,835
		Homeowner		116429	42	11	7	60	4,555,850
		Renter		75,338	26	10	2	38	1,820,986

As of: 7/10/2018

Totals For Mo

GCRPC LBAP MOD 80%

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

HUD Total LBAP Funding to Allocate	\$18,430,647
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577

Codes to Receive 80% Allocation

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	15% Resiliency	Unmet Need \$ Amount, Plus 15% Resiliency Derived Using Severity Levels	Unmet Need Plus Resiliency Removing Any Overlap	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	Estimated Unmet Need Plus Resiliency Amount per Capita
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	5,809,232	44,537,445	44,537,445	-0.817484	1.00	1,691.64
		Homeowner		3,511,583	26,922,136				
		Renter		2,297,649	17,615,309				
2	GCRPC	City of Victoria	66139	5,809,232	44,537,445	44,537,445	-0.817484	1.00	673.39
		Homeowner		3,511,583	26,922,136				
		Renter		2,297,649	17,615,309				
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	956,525	7,333,361	7,333,361	-0.41746	1.40	1,544.84
		Homeowner		683,377	5,239,227				
		Renter		273,148	2,094,134				
10	GCRPC	City of Port Lavaca (77979)	12248	956,525	7,333,361	7,333,361	-0.41746	1.40	598.74
		Homeowner		683,377	5,239,227				
		Renter		273,148	2,094,134				

As of: 7/10/2018

st Impacted Counties and Zip Codes 103,741,611 4.80 4,508.61

Min SoVI -0.8175

GCRPC LBAP MOD 80%

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

		HUD Total LBAP Funding to Allocate	\$18,430,647					
		Required Minimum Distribution (Per Eligible Entity)	\$1,000,000					
		80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577	Distribution Percentages:				
		Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577	I.	II.	III.	IV.	
	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Distribution Percentage Based on Unmet Need plus Resiliency	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI -MinSoVI), and 10% (Unmet Need Per Capita)	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	42.93%	20.83%	37.52%	33.55%	2,887,578
		Homeowner						
		Renter						
2	GCRPC	City of Victoria	66139	42.93%	20.83%	14.94%	31.29%	2,693,203
		Homeowner						
		Renter						
7	GCRPC	77979 Calhoun County (Excluding City of Port Lava	4747	7.07%	29.17%	34.26%	18.63%	1,603,200
		Homeowner						
		Renter						
10	GCRPC	City of Port Lavaca (77979)	12248	7.07%	29.17%	13.28%	16.53%	1,422,596
		Homeowner						
		Renter						

As of: 7/10/2018

100% 100% 100% 100% \$ 8,606,577

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

HUD Total LBAP Funding to Allocate	\$18,430,647
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577

HUD-GLO Additional LBAP Allocation \$ -

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount × (Percentage Allocation Using Unconstrained 50-40-10 Model)	Total \$ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints	Maximum Future Additional Distribution #1	Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	41,649,867	\$ 2,545,545	39,104,322	\$ -
		Homeowner					
		Renter					
2	GCRPC	City of Victoria	66139	41,844,242	\$ 2,441,508	39,402,734	\$ -
		Homeowner					
		Renter					
7	GCRPC	77979 Calhoun County (Excluding City of Port Lava	4747	5,730,161	\$ 1,858,095	3,872,066	\$ -
		Homeowner					
		Renter					
10	GCRPC	City of Port Lavaca (77979)	12248	5,910,764	\$ 1,761,429	4,149,335	\$ -
		Homeowner					
		Renter					

As of: 7/10/2018

\$ 8,606,577

\$86,528,457
Remaining Regional Unmet Need Plus Resiliency Cost

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

HUD Total LBAP Funding to Allocate	\$18,430,647
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Maximum Future Additional Distribution #2
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	\$39,104,322
		Homeowner		
		Renter		
2	GCRPC	City of Victoria	66139	\$39,402,734
		Homeowner		
		Renter		
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	\$3,872,066
		Homeowner		
		Renter		
10	GCRPC	City of Port Lavaca (77979)	12248	\$4,149,335
		Homeowner		
		Renter		

As of: **7/10/2018**

\$86,528,457
Remaining Regional Unmet Need Plus Resiliency Cost After Allocation of Additional Funding

GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

HUD Total LBAP Funding to Allocate	\$18,430,647
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Maximum Allocation Reached?	Original Distribution % for Counties Not Hitting Max in First Distribution	HUD Dollar Value Severity Category Multipliers	Unmet Need Severity Category	HUD \$ Damage Thresholds by Severity Category for Owners	HUD \$ Damage Thresholds by Severity Category for Renters
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	NO	33.55%	\$72,961.00	Major-High	15000-28799	3500-7499
		Homeowner				\$102,046.00	Severe	≥ 28800	≥ 7500
		Renter							
2	GCRPC	City of Victoria	66139	NO	31.29%	0.5777	Major-Low		
		Homeowner				0.7150	Major-High		
		Renter				1.0000	Severe		
7	GCRPC	77979 Calhoun County (Excluding City of Port Lava	4747	NO	18.63%				
		Homeowner							
		Renter							
10	GCRPC	City of Port Lavaca (77979)	12248	NO	16.53%				
		Homeowner							
		Renter							

As of: 7/10/2018

100%

GCRPC
Local
Buyout
and
Acquisiti
on
Program
(LBAP)
Method
of
Distributi
on

		HUD Total LBAP Funding to Allocate	\$18,430,647														
		Required Minimum Distribution (Per Eligible Entity)	\$1,000,000	\$	4,000,000												
		80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577	HUD Most Impacted Counties and Zip Codes to Receive 80% Allocation													
		Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$	8,606,577													
	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Median \$ Value of Housing Units for Homeowners/ Median Value of Constructing Rental Unit for Renters	FEMA Verified Count of Unmet Need--Major-Low Damage Severity	FEMA Verified Count of Unmet Need--Major-High Damage Severity	FEMA Verified Count of Unmet Need--Severe Damage	Total FEMA Verified Count of Unmet Need Units	Unmet Need \$ Amount Derived Using Severity Levels	15% Resiliency	Unmet Need \$ Amount, Plus 15% Resiliency Derived Using Severity Levels	Unmet Need Plus Resiliency Removing Any Overlap	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	Estimated Unmet Need Plus Resiliency Amount per Capita	Distribution Percentage Based on Unmet Need plus Resiliency	
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328		382	178	44	604	38,728,213	5,809,232	44,537,445	44,537,445	-0.817484	1.00	1,691.64	42.93%	
		Homeowner		124,100	184	76	28	288	23,410,553	3,511,583	26,922,136						
		Renter		75,338	198	102	16	316	15,317,660	2,297,649	17,615,309						
2	GCRPC	City of Victoria	66139		382	178	44	604	38,728,213	5,809,232	44,537,445	44,537,445	-0.817484	1.00	673.39	42.93%	
		Homeowner		124,100	184	76	28	288	23,410,553	3,511,583	26,922,136						
		Renter		75,338	198	102	16	316	15,317,660	2,297,649	17,615,309						
3	GCRPC	Victoria ISD (Grand Total County minus Nursery ISD)															
4	GCRPC	Nursery Independent School District															
5	GCRPC	Victoria County Junior College District (Enrollment 2016/17)															
6	GCRPC	Victoria Electric Cooperative, Inc. (Residential Meters)															
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747		68	21	9	98	6,376,835	956,525	7,333,361	7,333,361	-0.41746	1.40	1,544.84	7.07%	
		Homeowner		116429	42	11	7	60	4,555,850	683,377	5,239,227						
		Renter		75,338	26	10	2	38	1,820,986	273,148	2,094,134						
8	GCRPC	Calhoun County Independent School District (City of Port Lavaca and 77979)															
9	GCRPC	South Central Calhoun County Water Control & Improvement District #1															
10	GCRPC	City of Port Lavaca (77979)	12248		68	21	9	98	6,376,835	956,525	7,333,361	7,333,361	-0.41746	1.40	598.74	7.07%	
		Homeowner		116429	42	11	7	60	4,555,850	683,377	5,239,227						
		Renter		75,338	26	10	2	38	1,820,986	273,148	2,094,134						
11	GCRPC	La Salle Water Control & Improvement District #1A															

As of: 6/20/2018

Totals For Most Impacted Counties and Zip Codes 103,741,611 4.80 4,508.61 100%

Min SoVI -0.8175

GCRPC
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(LBAP)
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HUD Total LBAP Funding to Allocate	\$18,430,647									
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000									
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577	Distribution Percentages:								
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577	II.	III.	IV.						

HUD-GLO Additional LBAP Allocation \$ -

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI - MinSoVI), and 10% (Unmet Need Per Capita)	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints	Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount x (Percentage Allocation Using Unconstrained 50-40-10 Model)	Total \$ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints	Maximum Future Additional Distribution #1	Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	20.83%	37.52%	33.55%	2,887,578	41,649,867	\$ 2,545,545	39,104,322	\$ -
		Homeowner									
		Renter									
2	GCRPC	City of Victoria	66139	20.83%	14.94%	31.29%	2,693,203	41,844,242	\$ 2,441,508	39,402,734	\$ -
		Homeowner									
		Renter									
3	GCRPC	Victoria ISD (Grand Total County minus Nursery ISD)									
4	GCRPC	Nursery Independent School District									
5	GCRPC	Victoria County Junior College District (Enrollment 2016/17)									
6	GCRPC	Victoria Electric Cooperative, Inc. (Residential Meters)									
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	29.17%	34.26%	18.63%	1,603,200	5,730,161	\$ 1,858,095	3,872,066	\$ -
		Homeowner									
		Renter									
8	GCRPC	Calhoun County Independent School District (City of Port Lavaca and 77979)									
9	GCRPC	South Central Calhoun County Water Control & Improvement District #1									
10	GCRPC	City of Port Lavaca (77979)	12248	29.17%	13.28%	16.53%	1,422,596	5,910,764	\$ 1,761,429	4,149,335	\$ -
		Homeowner									
		Renter									
11	GCRPC	La Salle Water Control & Improvement District #1A									

As of: 6/20/2018

100% 100% 100% \$ 8,606,577

\$ 8,606,577 \$86,528,457

Remaining Regional Unmet Need Plus Resiliency Cost
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GCRPC
Local
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and
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Program
(LBAP)
Method
of
Distributi
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HUD Total LBAP Funding to Allocate	\$18,430,647
Required Minimum Distribution (Per Eligible Entity)	\$1,000,000
80% Allocation \$ Left After Required Minimum Distribution	\$4,606,577
Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes	\$ 8,606,577

	COG	Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Maximum Future Additional Distribution #2	Maximum Allocation Reached?	Original Distribution % for Counties Not Hitting Max in First Distribution	HUD Dollar Value Severity Category Multipliers	Unmet Need Severity Category	HUD \$ Damage Thresholds by Severity Category for Owners	HUD \$ Damage Thresholds by Severity Category for Renters
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	\$39,104,322	NO	33.55%	\$72,961.00	Major-High	15000-28799	3500-7499
		Homeowner					\$102,046.00	Severe	≥ 28800	≥ 7500
		Renter								
2	GCRPC	City of Victoria	66139	\$39,402,734	NO	31.29%	0.5777	Major-Low		
		Homeowner					0.7150	Major-High		
		Renter					1.0000	Severe		
3	GCRPC	Victoria ISD (Grand Total County minus Nursery ISD)								
4	GCRPC	Nursery Independent School District								
5	GCRPC	Victoria County Junior College District (Enrollment 2016/17)								
6	GCRPC	Victoria Electric Cooperative, Inc. (Residential Meters)								
7	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	\$3,872,066	NO	18.63%				
		Homeowner								
		Renter								
8	GCRPC	Calhoun County Independent School District (City of Port Lavaca and 77979)								
9	GCRPC	South Central Calhoun County Water Control & Improvement District #1								
10	GCRPC	City of Port Lavaca (77979)	12248	\$4,149,335	NO	16.53%				
		Homeowner								
		Renter								
11	GCRPC	La Salle Water Control & Improvement District #1A								

As of: 6/20/2018

\$86,528,457
Remaining Regional Unmet Need Plus Resiliency Cost After Allocation of Additional Funding

100%

=.12* (Lg Umet Need)*(% units high or severe damage)

As of: 7/10/2018

		Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority	\$ 9,824,070				
		Required Minimum Distribution (Per Eligible Entity)	\$ 1,000,000	\$ 6,000,000			
		Minimum Distribution	\$ 3,824,070	HUD D			
COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Median \$ Value of Housing Units for Homeowners/ Median Value of Constructing Rental Unit for Renters	FEMA Verified Count of Unmet Need--Major-Low Damage Severity	FEMA Verified Count of Unmet Need--Major-High Damage Severity	FEMA Verified Count of Unmet Need--Severe Damage	
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970		36	13	6	
	Homeowner		\$ 111,500	26	8	6	
	Renter		\$ 75,338	10	5	0	
13	GCRPC City of Point Comfort						
16	GCRPC City of Seadrift						
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865		26	9	1	
	Homeowner		104300	18	7	1	
	Renter		75338	8	2	0	
20	GCRPC City of Cuero						
26	GCRPC City of Yoakum						
30	GCRPC City of Yorktown						
33	GCRPC Goliad County (Excluding City of Goliad)	7517		15	5	1	
	Homeowner		\$ 124,700	14	3	0	
	Renter		\$ 75,338	1	2	1	
34	GCRPC City of Goliad						
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876		15	3	0	
	Homeowner		\$ 98,800	12	3	0	
	Renter		\$ 75,338	3	0	0	
40	GCRPC City of Gonzales						
46	GCRPC City of Nixon						
48	GCRPC City of Smiley						
49	GCRPC City of Waelder						
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869		6	6	1	
	Homeowner		\$ 89,900	2	3	1	
	Renter		\$ 75,338	4	3	0	
52	GCRPC City of Edna						
56	GCRPC City of Ganado						
61	GCRPC City of La Ward						
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809		2	1	0	
	Homeowner		\$ 131,000	2	1	0	
	Renter		\$ 75,338	0	0	0	
64	GCRPC City of Hallettsville						
70	GCRPC City of Moulton						
72	GCRPC City of Shiner						

Min SoVI: -0.42

As of: 7/10/2018

		Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority												Distribution Percentages:			
		Required Minimum Distribution (Per Eligible Entity)												I.	II.	III.	IV.
		Minimum Distribution	esignated Lesser Impacted Counties to Receive 20% Allocation											Distribution Percentage Based on Unmet Need Plus Resiliency	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI - MinSoVI), and 10% (Unmet Need Per Capita)
COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Total FEMA Verified Count of Unmet Need Units	Unmet Need \$ Amount Derived Using Severity Levels	15% Resiliency	Unmet Need \$ Amount, Plus 15% Resiliency Derived Using Severity Levels	Unmet Need Plus Resiliency Removing Any Overlap	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	Estimated Unmet Need Plus Resiliency Amount per Capita							
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970	55	\$ 3,686,209	552,931	4,239,141	4,239,141	-0.417463	1.00	853	39.42%	8.18%	64.18%	29.40%			
	Homeowner		40	\$ 2,981,630	447,245	3,428,875											
	Renter		15	\$ 704,579	105,687	810,266											
13	GCRPC City of Point Comfort																
16	GCRPC City of Seadrift																
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865	36	\$ 2,166,889	\$ 325,033	\$ 2,491,923	2,491,923	2.377820	3.80	119	23.17%	31.06%	8.99%	24.91%			
	Homeowner		26	\$ 1,710,956	\$ 256,643	\$ 1,967,599											
	Renter		10	\$ 455,933	\$ 68,390	\$ 524,323											
20	GCRPC City of Cuero																
26	GCRPC City of Yoakum																
30	GCRPC City of Yorktown																
33	GCRPC Goliad County (Excluding City of Goliad)	7517	21	\$ 1,502,685	225,403	1,728,088	1,728,088	0.259170	1.68	230	16.07%	13.72%	17.30%	15.25%			
	Homeowner		17	\$ 1,276,092	191,414	1,467,506											
	Renter		4	\$ 226,593	33,989	260,582											
34	GCRPC City of Goliad																
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876	18	\$ 1,027,465	154,120	1,181,584	1,181,584	2.107630	3.53	57	10.99%	28.85%	4.26%	17.46%			
	Homeowner		15	\$ 896,888	134,533	1,031,422											
	Renter		3	\$ 130,576	19,586	150,163											
40	GCRPC City of Gonzales																
46	GCRPC City of Nixon																
48	GCRPC City of Smiley																
49	GCRPC City of Waelder																
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869	13	\$ 722,305	108,346	830,650	830,650	-0.353250	1.06	56	7.72%	8.71%	4.20%	7.77%			
	Homeowner		6	\$ 386,608	57,991	444,599											
	Renter		7	\$ 335,697	50,354	386,051											
52	GCRPC City of Edna																
56	GCRPC City of Ganado																
61	GCRPC City of La Ward																
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809	3	\$ 245,030	36,755	281,785	281,785	-0.260853	1.16	14	2.62%	9.47%	1.07%	5.20%			
	Homeowner		3	\$ 245,030	36,755	281,785											
	Renter		0	\$ -	0	0											
64	GCRPC City of Hallettsville																
70	GCRPC City of Moulton																
72	GCRPC City of Shiner																
Totals For Not Most Impacted and Distressed Areas							10,753,171		12.22	1,329	100%	100%	100%	100%			

As of: 7/10/2018

Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority	\$ 9,824,070
Required Minimum Distribution (Per Eligible Entity)	\$ 1,000,000
Minimum Distribution	\$ 3,824,070

HUD-GLO Additional LBAP Allocation \$ -

COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints	Total \$ Available to Allocate After Minimum Distribution	Total \$ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints	Maximum Future Additional Distribution #1	Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency	Maximum Future Additional Distribution #2	Maximum Allocation Reached?	Original Distribution % for Counties Not Hitting Max in First Distribution
12 GCRPC	Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970	2,888,589	3,824,070	\$ 2,124,398	1,350,551	\$ -	1,350,551	NO	29.40%
	Homeowner									
	Renter									
13 GCRPC	City of Point Comfort									
16 GCRPC	City of Seadrift									
19 GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865	2,447,273	3,824,070	\$ 1,952,614	44,650	\$ -	44,650	NO	24.91%
	Homeowner									
	Renter									
20 GCRPC	City of Cuero									
26 GCRPC	City of Yoakum									
30 GCRPC	City of Yorktown									
33 GCRPC	Goliad County (Excluding City of Goliad)	7517	1,498,587	3,824,070	\$ 1,583,333	229,501	\$ -	229,501	NO	15.25%
	Homeowner									
	Renter									
34 GCRPC	City of Goliad									
39 GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876	1,715,365	3,824,070	\$ 1,667,714	-	\$ -	0	YES	
	Homeowner									
	Renter									
40 GCRPC	City of Gonzales									
46 GCRPC	City of Nixon									
48 GCRPC	City of Smiley									
49 GCRPC	City of Waelder									
51 GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869	763,020	3,824,070	\$ 1,297,010	67,630	\$ -	67,630	NO	7.77%
	Homeowner									
	Renter									
52 GCRPC	City of Edna									
56 GCRPC	City of Ganado									
61 GCRPC	City of La Ward									
63 GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809	511,236	3,824,070	\$ 1,199,001	-	\$ -	0	YES	
	Homeowner									
	Renter									
64 GCRPC	City of Hallettsville									
70 GCRPC	City of Moulton									
72 GCRPC	City of Shiner									

9,824,070	9,824,070	1,692,331.54	-	\$ 1,692,332	77%
		Remaining Regional Unmet Need Plus Resiliency Cost		Remaining Regional Unmet Need Plus Resiliency Cost After Allocation of Additional Funding	

=.12* (Lg Umet Need)*(% units high or severe

As of: 6/20/2018

Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority	\$ 9,824,070	
Required Minimum Distribution (Per Eligible Entity) Distribution	\$ 1,000,000	\$ 6,000,000
	\$ 3,824,070	HUD

COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Median \$ Value of Housing Units for Homeowners/ Median Value of Constructing Rental Unit for Renters	FEMA Verified Count of Unmet Need--Major-Low Damage Severity	FEMA Verified Count of Unmet Need--Major-High Damage Severity	FEMA Verified Count of Unmet Need--Severe Damage
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970		36	13	6
	Homeowner		\$ 111,500	26	8	6
	Renter		\$ 75,338	10	5	0
13	GCRPC City of Point Comfort					
14	GCRPC Calhoun Port Authority					
15	GCRPC Lavaca Pipe Line Company					
16	GCRPC City of Seadrift					
17	GCRPC Part O'Conner Improvement District					
18	GCRPC Westside Calhoun County Navigation District					
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865		26	9	1
	Homeowner		104300	18	7	1
	Renter		75338	8	2	0
20	GCRPC City of Cuero					
21	GCRPC Cuero Economic Corporation					
22	GCRPC Cuero Housing Authority					
23	GCRPC Cuero Independent School District					
24	GCRPC Dewitt County Drainage District No.1					
25	GCRPC Pecan Valley Groundwater Conservation District					
26	GCRPC City of Yoakum					
27	GCRPC Yoakum Hospital District					
28	GCRPC Yoakum Housing Authority					
29	GCRPC Yoakum Independent School District					
30	GCRPC City of Yorktown					
31	GCRPC Yorktown Housing Authority					
32	GCRPC Yorktown Independent School District					
33	GCRPC Goliad County (Excluding City of Goliad)	7517		15	5	1
	Homeowner		\$ 124,700	14	3	0
	Renter		\$ 75,338	1	2	1
34	GCRPC City of Goliad					
35	GCRPC Goliad County Groundwater Conservation District					
36	GCRPC Goliad Economic Development Corporation					
37	GCRPC Goliad Housing Authority					
38	GCRPC Goliad Independent School District					
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876		15	3	0
	Homeowner		\$ 98,800	12	3	0
	Renter		\$ 75,338	3	0	0
40	GCRPC City of Gonzales					
41	GCRPC Gonzales County Underground Water Conservation District					
42	GCRPC Gonzales County Water Supply Corporation					
43	GCRPC Gonzales Healthcare Systems					
44	GCRPC Gonzales Independent School District					
45	GCRPC Guadalupe Valley Electric Cooperative, Inc.					
46	GCRPC City of Nixon					
47	GCRPC Nixon-Smiley Consolidated Independent School District					
48	GCRPC City of Smiley					
49	GCRPC City of Waelder					
50	GCRPC Waelder Independent School District					
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869		6	6	1
	Homeowner		\$ 89,900	2	3	1
	Renter		\$ 75,338	4	3	0
52	GCRPC City of Edna					
53	GCRPC Edna Independent School District					
54	GCRPC Jackson County Navigation District					
55	GCRPC Lavaca-Navidad River Authority					
56	GCRPC City of Ganado					
57	GCRPC Ganado Independent School District					
58	GCRPC Ganado Telephone Co, Inc.					
59	GCRPC Jackson Electric Cooperative, Inc.					
60	GCRPC YK Communications					
61	GCRPC City of La Ward					
62	GCRPC La Ward Telephone Exchange, Inc.					
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809		2	1	0
	Homeowner		\$ 131,000	2	1	0
	Renter		\$ 75,338	0	0	0
64	GCRPC City of Hallettsville					
65	GCRPC Ezzell Independent School District					
66	GCRPC Hallettsville 4A Business Development Corporation					
67	GCRPC Hallettsville 4B Business Development Corporation					
68	GCRPC Hallettsville Independent School District					
69	GCRPC Vysehrad Independent School District					
70	GCRPC City of Moulton					
71	GCRPC Moulton Independent School District					
72	GCRPC City of Shiner					
73	GCRPC Shiner Independent School District					

Min SoVI: -0.42

As of: 6/20/2018

		Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority										I.
		\$ 9,824,070										
		Required Minimum Distribution (Per Eligible Entity) Distribution										
		\$ 3,824,070	Designated Lesser Impacted Counties to Receive 20% Allocation									
COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Total FEMA Verified Count of Unmet Need Units	Unmet Need \$ Amount Derived Using Severity Levels	Resiliency	Unmet Need \$ Amount, Plus 15% Resiliency Derived Using Severity Levels	Unmet Need Plus Resiliency Removing Any Overlap	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	Estimated Unmet Need Plus Resiliency Amount per Capita	Distribution Percentage Based on Unmet Need Plus Resiliency	
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970	55	\$ 3,686,209	552,931	4,239,141	4,239,141	-0.417463	1.00	853	39.42%	
	Homeowner		40	\$ 2,981,630	447,245	3,428,875						
	Renter		15	\$ 704,579	105,687	810,266						
13	GCRPC City of Point Comfort											
14	GCRPC Calhoun Port Authority											
15	GCRPC Lavaca Pipe Line Company											
16	GCRPC City of Seadrift											
17	GCRPC Part O'Conner Improvement District											
18	GCRPC Westside Calhoun County Navigation District											
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865	36	\$ 2,166,889	\$ 325,033	\$ 2,491,923	2,491,923	2.377820	3.80	119	23.17%	
	Homeowner		26	\$ 1,710,956	\$ 256,643	\$ 1,967,599						
	Renter		10	\$ 455,933	\$ 68,390	\$ 524,323						
20	GCRPC City of Cuero											
21	GCRPC Cuero Economic Corporation											
22	GCRPC Cuero Housing Authority											
23	GCRPC Cuero Independent School District											
24	GCRPC Dewitt County Drainage District No.1											
25	GCRPC Pecan Valley Groundwater Conservation District											
26	GCRPC City of Yoakum											
27	GCRPC Yoakum Hospital District											
28	GCRPC Yoakum Housing Authority											
29	GCRPC Yoakum Independent School District											
30	GCRPC City of Yorktown											
31	GCRPC Yorktown Housing Authority											
32	GCRPC Yorktown Independent School District											
33	GCRPC Goliad County (Excluding City of Goliad)	7517	21	\$ 1,502,685	225,403	1,728,088	1,728,088	0.259170	1.68	230	16.07%	
	Homeowner		17	\$ 1,276,092	191,414	1,467,506						
	Renter		4	\$ 226,593	33,989	260,582						
34	GCRPC City of Goliad											
35	GCRPC Goliad County Groundwater Conservation District											
36	GCRPC Goliad Economic Development Corporation											
37	GCRPC Goliad Housing Authority											
38	GCRPC Goliad Independent School District											
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876	18	\$ 1,027,465	154,120	1,181,584	1,181,584	2.107630	3.53	57	10.99%	
	Homeowner		15	\$ 896,888	134,533	1,031,422						
	Renter		3	\$ 130,576	19,586	150,163						
40	GCRPC City of Gonzales											
41	GCRPC Gonzales County Underground Water Conservation District											
42	GCRPC Gonzales County Water Supply Corporation											
43	GCRPC Gonzales Healthcare Systems											
44	GCRPC Gonzales Independent School District											
45	GCRPC Guadalupe Valley Electric Cooperative, Inc.											
46	GCRPC City of Nixon											
47	GCRPC Nixon-Smiley Consolidated Independent School District											
48	GCRPC City of Smiley											
49	GCRPC City of Waelder											
50	GCRPC Waelder Independent School District											
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869	13	\$ 722,305	108,346	830,650	830,650	-0.353250	1.06	56	7.72%	
	Homeowner		6	\$ 386,608	57,991	444,599						
	Renter		7	\$ 335,697	50,354	386,051						
52	GCRPC City of Edna											
53	GCRPC Edna Independent School District											
54	GCRPC Jackson County Navigation District											
55	GCRPC Lavaca-Navidad River Authority											
56	GCRPC City of Ganado											
57	GCRPC Ganado Independent School District											
58	GCRPC Ganado Telephone Co, Inc.											
59	GCRPC Jackson Electric Cooperative, Inc.											
60	GCRPC YK Communications											
61	GCRPC City of La Ward											
62	GCRPC La Ward Telephone Exchange, Inc.											
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809	3	\$ 245,030	36,755	281,785	281,785	-0.260853	1.16	14	2.62%	
	Homeowner		3	\$ 245,030	36,755	281,785						
	Renter		0	\$ -	0	0						
64	GCRPC City of Hallettsville											
65	GCRPC Ezzell Independent School District											
66	GCRPC Hallettsville 4A Manufacturing Development Corporation											
67	GCRPC Hallettsville 4B Business Development Corporation											
68	GCRPC Hallettsville Independent School District											
69	GCRPC Vysehrad Independent School District											
70	GCRPC City of Moulton											
71	GCRPC Moulton Independent School District											
72	GCRPC City of Shiner											
73	GCRPC Shiner Independent School District											

Totals For Not Most Impacted and Distressed Areas 10,753,171 12.22 1,329 100%

6/20/2018

As of:

		Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority	\$ 9,824,070	Distribution Percentages:			HUD-GLO Additional LBAP Allocation			
		Required Minimum Distribution (Per Eligible Entity) Distribution	\$ 1,000,000							
			\$ 3,824,070	II.	III.	IV.				
COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI -MinSoVI), and 10% (Unmet Need Per Capita)	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints	Total \$ Available to Allocate After Minimum Distribution	Total \$ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints	Maximum Future Additional Distribution #1	
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970	8%	64.18%	29.40%	2,888,589	3,824,070	\$ 2,124,398	1,350,551	
	Homeowner									
	Renter									
13	GCRPC City of Point Comfort									
14	GCRPC Calhoun Port Authority									
15	GCRPC Lavaca Pipe Line Company									
16	GCRPC City of Seadrift									
17	GCRPC Part O'Conner Improvement District									
18	GCRPC Westside Calhoun County Navigation District									
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865	31%	8.99%	24.91%	2,447,273	3,824,070	\$ 1,952,614	44,650	
	Homeowner									
	Renter									
20	GCRPC City of Cuero									
21	GCRPC Cuero Economic Corporation									
22	GCRPC Cuero Housing Authority									
23	GCRPC Cuero Independent School District									
24	GCRPC Dewitt County Drainage District No.1									
25	GCRPC Pecan Valley Groundwater Conservation District									
26	GCRPC City of Yoakum									
27	GCRPC Yoakum Hospital District									
28	GCRPC Yoakum Housing Authority									
29	GCRPC Yoakum Independent School District									
30	GCRPC City of Yorktown									
31	GCRPC Yorktown Housing Authority									
32	GCRPC Yorktown Independent School District									
33	GCRPC Goliad County (Excluding City of Goliad)	7517	14%	17.30%	15.25%	1,498,587	3,824,070	\$ 1,583,333	229,501	
	Homeowner									
	Renter									
34	GCRPC City of Goliad									
35	GCRPC Goliad County Groundwater Conservation District									
36	GCRPC Goliad Economic Development Corporation									
37	GCRPC Goliad Housing Authority									
38	GCRPC Goliad Independent School District									
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876	29%	4.26%	17.46%	1,715,365	3,824,070	\$ 1,667,714	-	
	Homeowner									
	Renter									
40	GCRPC City of Gonzales									
41	GCRPC Gonzales County Underground Water Conservation District									
42	GCRPC Gonzales County Water Supply Corporation									
43	GCRPC Gonzales Healthcare Systems									
44	GCRPC Gonzales Independent School District									
45	GCRPC Guadalupe Valley Electric Cooperative, Inc.									
46	GCRPC City of Nixon									
47	GCRPC Nixon-Smiley Consolidated Independent School District									
48	GCRPC City of Smiley									
49	GCRPC City of Waelder									
50	GCRPC Waelder Independent School District									
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869	9%	4.20%	7.77%	763,020	3,824,070	\$ 1,297,010	67,630	
	Homeowner									
	Renter									
52	GCRPC City of Edna									
53	GCRPC Edna Independent School District									
54	GCRPC Jackson County Navigation District									
55	GCRPC Lavaca-Navidad River Authority									
56	GCRPC City of Ganado									
57	GCRPC Ganado Independent School District									
58	GCRPC Ganado Telephone Co, Inc.									
59	GCRPC Jackson Electric Cooperative, Inc.									
60	GCRPC YK Communications									
61	GCRPC City of La Ward									
62	GCRPC La Ward Telephone Exchange, Inc.									
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809	9%	1.07%	5.20%	511,236	3,824,070	\$ 1,199,001	-	
	Homeowner									
	Renter									
64	GCRPC City of Hallettsville									
65	GCRPC Ezzell Independent School District									
66	GCRPC Hallettsville 4A Manufacturing Development Corporation									
67	GCRPC Hallettsville 4B Business Development Corporation									
68	GCRPC Hallettsville Independent School District									
69	GCRPC Vysehrad Independent School District									
70	GCRPC City of Moulton									
71	GCRPC Moulton Independent School District									
72	GCRPC City of Shiner									
73	GCRPC Shiner Independent School District									

100% 100% 100% 9,824,070 9,824,070 1,692,331.54

Remaining Regional Unmet Need Plus Resiliency Cost

6/20/2018

As of:

Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority	\$ 9,824,070
Required Minimum Distribution (Per Eligible Entity) Distribution	\$ 1,000,000
	\$ 3,824,070

COG	Impacted Eligible Entity to Receive at Least 20% Allocation	County/City Population	Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency	Maximum Future Additional Distribution #2	Maximum Allocation Reached?	Original Distribution % for Counties Not Hitting Max in First Distribution
12	GCRPC Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)	4970	\$ -	1,350,551	NO	29.40%
	Homeowner					
	Renter					
13	GCRPC City of Point Comfort					
14	GCRPC Calhoun Port Authority					
15	GCRPC Lavaca Pipe Line Company					
16	GCRPC City of Seadrift					
17	GCRPC Part O'Conner Improvement District					
18	GCRPC Westside Calhoun County Navigation District					
19	GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	20865	\$ -	44,650	NO	24.91%
	Homeowner					
	Renter					
20	GCRPC City of Cuero					
21	GCRPC Cuero Economic Corporation					
22	GCRPC Cuero Housing Authority					
23	GCRPC Cuero Independent School District					
24	GCRPC Dewitt County Drainage District No.1					
25	GCRPC Pecan Valley Groundwater Conservation District					
26	GCRPC City of Yoakum					
27	GCRPC Yoakum Hospital District					
28	GCRPC Yoakum Housing Authority					
29	GCRPC Yoakum Independent School District					
30	GCRPC City of Yorktown					
31	GCRPC Yorktown Housing Authority					
32	GCRPC Yorktown Independent School District					
33	GCRPC Goliad County (Excluding City of Goliad)	7517	\$ -	229,501	NO	15.25%
	Homeowner					
	Renter					
34	GCRPC City of Goliad					
35	GCRPC Goliad County Groundwater Conservation District					
36	GCRPC Goliad Economic Development Corporation					
37	GCRPC Goliad Housing Authority					
38	GCRPC Goliad Independent School District					
39	GCRPC Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	20876	\$ -	0	YES	
	Homeowner					
	Renter					
40	GCRPC City of Gonzales					
41	GCRPC Gonzales County Underground Water Conservation District					
42	GCRPC Gonzales County Water Supply Corporation					
43	GCRPC Gonzales Healthcare Systems					
44	GCRPC Gonzales Independent School District					
45	GCRPC Guadalupe Valley Electric Cooperative, Inc.					
46	GCRPC City of Nixon					
47	GCRPC Nixon-Smiley Consolidated Independent School District					
48	GCRPC City of Smiley					
49	GCRPC City of Waelder					
50	GCRPC Waelder Independent School District					
51	GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	14869	\$ -	67,630	NO	7.77%
	Homeowner					
	Renter					
52	GCRPC City of Edna					
53	GCRPC Edna Independent School District					
54	GCRPC Jackson County Navigation District					
55	GCRPC Lavaca-Navidad River Authority					
56	GCRPC City of Ganado					
57	GCRPC Ganado Independent School District					
58	GCRPC Ganado Telephone Co, Inc.					
59	GCRPC Jackson Electric Cooperative, Inc.					
60	GCRPC YK Communications					
61	GCRPC City of La Ward					
62	GCRPC La Ward Telephone Exchange, Inc.					
63	GCRPC Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	19809	\$ -	0	YES	
	Homeowner					
	Renter					
64	GCRPC City of Hallettsville					
65	GCRPC Ezzell Independent School District					
66	GCRPC Hallettsville 4A Manufacturing Development Corporation					
67	GCRPC Hallettsville 4B Business Development Corporation					
68	GCRPC Hallettsville Independent School District					
69	GCRPC Vysehrad Independent School District					
70	GCRPC City of Moulton					
71	GCRPC Moulton Independent School District					
72	GCRPC City of Shiner					
73	GCRPC Shiner Independent School District					

- \$ 1,692,332 77%
 Remaining Regional Unmet Need Plus Resiliency Cost After Allocation of Additional Funding

GCRPC LIP MOD Allocation Summary

#	COG	Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes	70% LMI	
1	GCRPC	Victoria County (Excluding City of Victoria)	\$ 3,515,651	\$ 2,460,956
2	GCRPC	City of Victoria	\$ 6,056,722	\$ 4,239,706
3	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	\$ 3,740,301	\$ 2,618,211
4	GCRPC	City of Port Lavaca (77979)	\$ 5,113,395	\$ 3,579,376
80% LIP Sub-Total			\$ 18,426,069	\$ 12,898,248

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties		
5	GCRPC	Calhoun County (Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)	\$ 2,196,247	\$ 1,537,373
6	GCRPC	City of Point Comfort	\$ 1,031,252	\$ 721,877
7	GCRPC	City of Seadrift	\$ 1,536,581	\$ 1,075,607
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	\$ 866,608	\$ 606,626
9	GCRPC	City of Cuero	\$ 1,426,977	\$ 998,884
10	GCRPC	City of Yoakum	\$ 1,416,383	\$ 991,468
11	GCRPC	City of Yorktown	\$ 793,105	\$ 555,174
12	GCRPC	Goliad County (Excluding City of Goliad)	\$ 723,030	\$ 506,121
13	GCRPC	City of Goliad	\$ 477,108	\$ 333,975
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	\$ 903,466	\$ 632,426
15	GCRPC	City of Gonzales	\$ 852,300	\$ 596,610
16	GCRPC	City of Nixon	\$ 671,903	\$ 470,332
17	GCRPC	City of Smiley	\$ 595,907	\$ 417,135
18	GCRPC	City of Waelder	\$ 623,785	\$ 436,649
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	\$ 840,270	\$ 588,189
20	GCRPC	City of Edna	\$ 730,897	\$ 511,628
21	GCRPC	City of Ganado	\$ 418,493	\$ 292,945
22	GCRPC	City of La Ward	\$ 297,827	\$ 208,479
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	\$ 400,454	\$ 280,318
24	GCRPC	City of Hallettsville	\$ 279,939	\$ 195,957
25	GCRPC	City of Moulton	\$ 263,295	\$ 184,306
26	GCRPC	City of Shiner	\$ 272,693	\$ 190,885
20% LIP Sub-Total			\$ 17,618,520	\$ 12,332,964

GCRPC LIP Grand Total(s) \$ 36,044,589 \$ 25,231,212

As of: 7/10/2018

GCRPC Local Infrastructure Program Method of Distribution

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 400,000
80% Allocation Remaining for distribution after required minimum allocation	\$ 18,026,069

As of: 7/10/2018

#	COG	Initial 80% Allocation of Funds For HUD Most Impacted Counties, Cities, and Zip Codes									
			County or Zip Code July 2016 Population	% of Total County Population	Public Assistance	Unmet Need \$ Amount Derived Using 10% Match of Public Assistance Requests	15% Resiliency	Unmet Need \$ Amount Plus (+) 15% Resiliency	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	Estimated Unmet Need Plus Resiliency Amount per Capita
		\$ 18,426,069									
		Most Impacted Declared Disaster County, City, or Zip Code to Receive at Least 80% Allocation									
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	28.47%	\$ 10,785,033	\$ 1,078,503	\$ 161,775	\$ 1,240,279	-0.817484	1.00	\$ 47.11
2	GCRPC	City of Victoria	66139	71.53%	\$ 27,093,257	\$ 2,709,326	\$ 406,399	\$ 3,115,725	-0.817484	1.00	\$ 47.11
			1.00								
3	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	21.61%	\$ 5,576,865	\$ 557,686	\$ 83,653	\$ 641,339	-0.41746	1.40	\$ 135.10
4	GCRPC	City of Port Lavaca (77979)	12248	55.76%	\$ 14,389,181	\$ 1,438,918	\$ 215,838	\$ 1,654,756	-0.41746	1.40	\$ 135.10

0.77

Totals For Most Impacted Counties and Zip Codes \$ 57,844,336 \$ 6,652,099 4.80 \$ 364.43

Min SoVI -0.817484

GCRPC Local Infrastructure Program Met

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 400,000
80% Allocation Remaining for distribution after required minimum allocation	\$ 18,026,069

#	COG	Initial 80% Allocation of Funds For HUD Most Impacted Counties, Cities, and Zip Codes	\$ 18,426,069						
		Most Impacted Declared Disaster County, City, or Zip Code to Receive at Least 80% Allocation	County or Zip Code July 2016 Population	Distribution Percentage Based on Unmet Need plus Resiliency	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with: 50% (Unmet Need plus Resiliency), 40% (1+SoVI -MinSoVI), and 10% (Unmet Need Per Capita)	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints ("Max")	Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount × (Percentage Allocation Using Unconstrained 50-40-10 Model)
1	GCRPC	Victoria County (Excluding City of Victoria)	26,328	18.64%	20.83%	12.93%	18.95%	\$ 3,491,445	\$ (2,251,166)
2	GCRPC	City of Victoria	66139	46.84%	20.83%	12.93%	33.05%	\$ 6,088,903	\$ (2,973,178)
3	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	4747	9.64%	29.17%	37.07%	20.19%	\$ 3,721,079	\$ (3,079,740)
4	GCRPC	City of Port Lavaca (77979)	12248	24.88%	29.17%	37.07%	27.81%	\$ 5,124,642	\$ (3,469,887)

Totals For Most Impacted Counties and Zip C 100% 100% 100% 100%

GCRPC Local Infrastructure Program Method of Distribution

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589	As of: 7/10/2018
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 2,200,000	
20% Allocation Remaining for distribution after required minimum	\$ 15,418,520	

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	\$ 17,618,520		
		County or City to Receive 20% Allocation	County or Zip Code July 2016 Population	% of Total County Population	Public Assistance
5	GCRPC	Calhoun County (Excluding Zip 17277, Calhoun County, Point Comfort, and City of Point Comfort)	2634	11.99%	\$ 3,094,473
6	GCRPC	City of Point Comfort	762	3.47%	\$ 895,212
7	GCRPC	City of Seadrift	1574	7.17%	\$ 1,849,165
				0.23	
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	2452	11.75%	\$ 433,974
9	GCRPC	City of Cuero	8429	40.40%	\$ 1,491,830
10	GCRPC	City of Yoakum	8316	39.86%	\$ 1,471,830
11	GCRPC	City of Yorktown	1668	7.99%	\$ 295,216
				1.00	
12	GCRPC	Goliad County (Excluding City of Goliad)	5609	74.62%	\$ 703,585
13	GCRPC	City of Goliad	1908	25.38%	\$ 239,337
				1.00	
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	8800	42.15%	\$ 624,994
15	GCRPC	City of Gonzales	7440	35.64%	\$ 528,404
16	GCRPC	City of Nixon	2645	12.67%	\$ 187,853
17	GCRPC	City of Smiley	625	2.99%	\$ 44,389
18	GCRPC	City of Waelder	1366	6.54%	\$ 97,016
				1.00	
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	7116	47.86%	\$ 1,060,838
20	GCRPC	City of Edna	5731	38.54%	\$ 854,365
21	GCRPC	City of Ganado	1775	11.94%	\$ 264,613
22	GCRPC	City of La Ward	247	1.66%	\$ 36,822
				1.00	
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	14447	72.93%	\$ 276,783
24	GCRPC	City of Hallettsville	2572	12.98%	\$ 49,276
25	GCRPC	City of Moulton	932	4.70%	\$ 17,856
26	GCRPC	City of Shiner	1858	9.38%	\$ 35,597
				1.00	
Totals For Impacted Counties and Cities					\$ 14,553,428

GCRPC Local Infrastructure Program Method

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 2,200,000
20% Allocation Remaining for distribution after required minimum	\$ 15,418,520

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	\$ 17,618,520						
		County or City to Receive 20% Allocation	County or Zip Code July 2016 Population	Unmet Need \$ Amount Derived Using 10% Match of Public Assistance Requests	15% Resiliency	Unmet Need \$ Amount Plus (+) Resiliency	Raw SoVI	Positive SoVI (1+SoVI - Min SoVI)	
5	GCRPC	Calhoun County (Excluding Zip 17277 Calhoun County, Point Comfort, and Seadrift)	2634	\$ 309,447	\$ 46,417	\$ 355,864	-0.417463	1.00	
6	GCRPC	City of Point Comfort	762	\$ 89,521	\$ 13,428	\$ 102,949	-0.417463	1.00	
7	GCRPC	City of Seadrift	1574	\$ 184,916	\$ 27,737	\$ 212,654	-0.417463	1.00	
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	2452	\$ 43,397	\$ 6,510	\$ 49,907	2.377820	3.80	
9	GCRPC	City of Cuero	8429	\$ 149,183	\$ 22,377	\$ 171,560	2.377820	3.80	
10	GCRPC	City of Yoakum	8316	\$ 147,183	\$ 22,077	\$ 169,260	2.377820	3.80	
11	GCRPC	City of Yorktown	1668	\$ 29,522	\$ 4,428	\$ 33,950	2.377820	3.80	
12	GCRPC	Goliad County (Excluding City of Goliad)	5609	\$ 70,359	\$ 10,554	\$ 80,912	0.259170	1.68	
13	GCRPC	City of Goliad	1908	\$ 23,934	\$ 3,590	\$ 27,524	0.259170	1.68	
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	8800	\$ 62,499	\$ 9,375	\$ 71,874	2.107630	3.53	
15	GCRPC	City of Gonzales	7440	\$ 52,840	\$ 7,926	\$ 60,766	2.107630	3.53	
16	GCRPC	City of Nixon	2645	\$ 18,785	\$ 2,818	\$ 21,603	2.107630	3.53	
17	GCRPC	City of Smiley	625	\$ 4,439	\$ 666	\$ 5,105	2.107630	3.53	
18	GCRPC	City of Waelder	1366	\$ 9,702	\$ 1,455	\$ 11,157	2.107630	3.53	
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	7116	\$ 106,084	\$ 15,913	\$ 121,996	-0.353250	1.06	
20	GCRPC	City of Edna	5731	\$ 85,437	\$ 12,815	\$ 98,252	-0.353250	1.06	
21	GCRPC	City of Ganado	1775	\$ 26,461	\$ 3,969	\$ 30,431	-0.353250	1.06	
22	GCRPC	City of La Ward	247	\$ 3,682	\$ 552	\$ 4,235	-0.353250	1.06	
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	14447	\$ 27,678	\$ 4,152	\$ 31,830	-0.260853	1.16	
24	GCRPC	City of Hallettsville	2572	\$ 4,928	\$ 739	\$ 5,667	-0.260853	1.16	
25	GCRPC	City of Moulton	932	\$ 1,786	\$ 268	\$ 2,053	-0.260853	1.16	
26	GCRPC	City of Shiner	1858	\$ 3,560	\$ 534	\$ 4,094	-0.260853	1.16	

Totals For Impacted Counties and Cities \$ 1,673,644 48.04
Min SoVI -0.417463

GCRPC Local Infrastructure Program Method

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 2,200,000
20% Allocation Remaining for distribution after required minimum	\$ 15,418,520

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	\$ 17,618,520	County or Zip Code July 2016 Population	Estimated Unmet Need Plus Resiliency Amount per Capita	Distribution Percentage Based on Unmet Need plus Resiliency	Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))	Distribution Percentage Based on Per-Capita Unmet Needs	Percentage Distribution Based on Model with: 50% (Unmet Need plus Resiliency), 40% (1+SoVI -MinSoVI), and 10% (Unmet Need Per Capita)	\$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints ("Max")	Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount * (Percentage Allocation Using Unconstrained 50-40-10 Model)	Minimum \$ Allocation if #/Eligible Applicants*Minimum < Funding Available
5	GCRPC	Calhoun County (Excluding City of Point Comfort, and City of Seadrift)	2634	\$ 135.10	21.26%	2.08%	21.32%	13.60%	\$ 2,395,352	\$ (2,039,487)	\$ 100,000	
6	GCRPC	City of Point Comfort	762	\$ 135.10	6.15%	2.08%	21.32%	6.04%	\$ 1,064,128	\$ (961,179)	\$ 100,000	
7	GCRPC	City of Seadrift	1574	\$ 135.10	12.71%	2.08%	21.32%	9.32%	\$ 1,641,561	\$ (1,428,907)	\$ 100,000	
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	2452	\$ 20.35	2.98%	7.90%	3.21%	4.97%	\$ 875,992	\$ (826,085)	\$ 100,000	
9	GCRPC	City of Cuero	8429	\$ 20.35	10.25%	7.90%	3.21%	8.61%	\$ 1,516,317	\$ (1,344,757)	\$ 100,000	
10	GCRPC	City of Yoakum	8316	\$ 20.35	10.11%	7.90%	3.21%	8.54%	\$ 1,504,212	\$ (1,334,951)	\$ 100,000	
11	GCRPC	City of Yorktown	1668	\$ 20.35	2.03%	7.90%	3.21%	4.50%	\$ 792,001	\$ (758,051)	\$ 100,000	
12	GCRPC	Goliad County (Excluding City of Goliad)	5609	\$ 14.43	4.83%	3.49%	2.28%	4.04%	\$ 711,927	\$ (631,015)	\$ 100,000	
13	GCRPC	City of Goliad	1908	\$ 14.43	1.64%	3.49%	2.28%	2.45%	\$ 430,915	\$ (403,392)	\$ 100,000	
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	8800	\$ 8.17	4.29%	7.34%	1.29%	5.21%	\$ 918,109	\$ (846,235)	\$ 100,000	
15	GCRPC	City of Gonzales	7440	\$ 8.17	3.63%	7.34%	1.29%	4.88%	\$ 859,643	\$ (798,876)	\$ 100,000	
16	GCRPC	City of Nixon	2645	\$ 8.17	1.29%	7.34%	1.29%	3.71%	\$ 653,506	\$ (631,902)	\$ 100,000	
17	GCRPC	City of Smiley	625	\$ 8.17	0.31%	7.34%	1.29%	3.22%	\$ 566,666	\$ (561,561)	\$ 100,000	
18	GCRPC	City of Waelder	1366	\$ 8.17	0.67%	7.34%	1.29%	3.40%	\$ 598,521	\$ (587,364)	\$ 100,000	
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	7116	\$ 17.14	7.29%	2.22%	2.70%	4.80%	\$ 845,896	\$ (723,899)	\$ 100,000	
20	GCRPC	City of Edna	5731	\$ 17.14	5.87%	2.22%	2.70%	4.09%	\$ 720,917	\$ (622,665)	\$ 100,000	
21	GCRPC	City of Ganado	1775	\$ 17.14	1.82%	2.22%	2.70%	2.07%	\$ 363,937	\$ (333,506)	\$ 100,000	
22	GCRPC	City of La Ward	247	\$ 17.14	0.25%	2.22%	2.70%	1.28%	\$ 226,054	\$ (221,819)	\$ 100,000	
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	14447	\$ 2.20	1.90%	2.41%	0.35%	1.95%	\$ 343,325	\$ (311,495)	\$ 100,000	
24	GCRPC	City of Hallettsville	2572	\$ 2.20	0.34%	2.41%	0.35%	1.17%	\$ 205,614	\$ (199,947)	\$ 100,000	
25	GCRPC	City of Moulton	932	\$ 2.20	0.12%	2.41%	0.35%	1.06%	\$ 186,595	\$ (184,541)	\$ 100,000	
26	GCRPC	City of Shiner	1858	\$ 2.20	0.24%	2.41%	0.35%	1.12%	\$ 197,333	\$ (193,240)	\$ 100,000	
Totals For Impacted Counties and Cities				\$ 633.80	100%	100%	100%	100%	\$ 17,618,520	\$ 2,200,000	\$ 15,418,520	

GCRPC Local Infrastructure Program Method

HUD Total Local Infrastructure Funding to Distribute	\$ 36,044,589
Required Minimum Allocation (\$100,000/entity) Grand Total	\$ 2,200,000
20% Allocation Remaining for distribution after required minimum	\$ 15,418,520

Additional CDBG-DR Allocation \$ -

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	\$ 17,618,520						
		County or City to Receive 20% Allocation	County or Zip Code July 2016 Population	\$ ALLOCATION: Using the 50-40-10 Model With Imposed Distributional Constraints	Funds Left to be Allocated Using Future CDBG-DR Allocations (Max - \$ ALLOCATION)	Maximum Allocation Reached?	Original Distribution % for Entities Not Hitting Max in Distribution #1	New Distribution % for Future Allocation	\$ Allocation Using Additional CDBG-DR Distribution #2
5	GCRPC	Calhoun County (Excluding Zip 17277 Calhoun County, Point Comfort, and Seadrift)	2634	\$ 2,196,247	\$ 199,104	NO	13.60%	20.61%	\$0.00
6	GCRPC	City of Point Comfort	762	\$ 1,031,252	\$ 32,876	NO	6.04%	9.16%	\$0.00
7	GCRPC	City of Seadrift	1574	\$ 1,536,581	\$ 104,979	NO	9.32%	14.13%	\$0.00
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	2452	\$ 866,608	\$ 9,384	NO	4.97%	7.54%	\$0.00
9	GCRPC	City of Cuero	8429	\$ 1,426,977	\$ 89,340	NO	8.61%	13.05%	\$0.00
10	GCRPC	City of Yoakum	8316	\$ 1,416,383	\$ 87,829	NO	8.54%	12.94%	\$0.00
11	GCRPC	City of Yorktown	1668	\$ 793,105	\$ -	YES		NA	
12	GCRPC	Goliad County (Excluding City of Goliad)	5609	\$ 723,030	\$ -	YES		NA	
13	GCRPC	City of Goliad	1908	\$ 477,108	\$ -	YES		NA	
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	8800	\$ 903,466	\$ 14,643	NO	5.21%	7.90%	\$0.00
15	GCRPC	City of Gonzales	7440	\$ 852,300	\$ 7,342	NO	4.88%	7.40%	\$0.00
16	GCRPC	City of Nixon	2645	\$ 671,903	\$ -	YES		NA	
17	GCRPC	City of Smiley	625	\$ 595,907	\$ -	YES		NA	
18	GCRPC	City of Waelder	1366	\$ 623,785	\$ -	YES		NA	
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	7116	\$ 840,270	\$ 5,626	NO	4.80%	7.28%	\$0.00
20	GCRPC	City of Edna	5731	\$ 730,897	\$ -	YES		NA	
21	GCRPC	City of Ganado	1775	\$ 418,493	\$ -	YES		NA	
22	GCRPC	City of La Ward	247	\$ 297,827	\$ -	YES		NA	
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	14447	\$ 400,454	\$ -	YES		NA	
24	GCRPC	City of Hallettsville	2572	\$ 279,939	\$ -	YES		NA	
25	GCRPC	City of Moulton	932	\$ 263,295	\$ -	YES		NA	
26	GCRPC	City of Shiner	1858	\$ 272,693	\$ -	YES		NA	
Totals For Impacted Counties and Cities				\$ 17,618,520	\$ 551,124		65.96%	100%	\$0.00

Resolution

**A RESOLUTION AUTHORIZING THE ADOPTION AND SUBMISSION
OF THE GOLDEN CRESCENT REGIONAL METHODS OF DISTRIBUTION
FOR HURRICANE HARVEY (ROUND 1) COMMUNITY DEVELOPMENT BLOCK
GRANT – DISASTER RECOVERY FUNDS**

The undersigned, the lawfully appointed and serving Secretary of the Golden Crescent Regional Planning Commission (GCRPC) does hereby certify that set forth below is a true and correct copy of the text of recitals and resolutions duly adopted by said Board of Directors of the Golden Crescent Regional Planning Commission on Wednesday, July 25, 2018, at a duly called and posted public meeting, duly held for the satisfied purpose of the consideration and adoption of such matters, and that the same are presently in full force and effect and have not been modified, revoked, or suspended and that the same have been adopted in conformity with all applicable provisions of law:

WHEREAS, on or about February 9, 2018, it was announced that the United States Department of Housing and Urban Development (HUD) had appropriated \$5.024 billion in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to Texas for recovery efforts associated with Hurricanes Harvey.

WHEREAS, Governor Greg Abbot has designated the State of Texas, General Land Office (GLO) as the primary state agency to oversee the allocation and administration of these funds and, to administer housing programs utilizing those CDBG-DR funds; and

WHEREAS, the GLO, in developing, for submission to HUD for its approval, the required State Action Plan for the administration of this disaster recovery program, has provided that funds will be allocated to the regions of the State based on a state Method of Distribution that considered population, social vulnerability, unmet need, resiliency, and Hurricane Harvey impact data; and

WHEREAS, the State Action Plan provides that in each region the Council of Governments will hold two or more public hearings and take appropriate measures to solicit public input and will consider that input, and along with its own assessment and other reliable information, develop methodologies pursuant to which such allocation will be distributed, making determinations regarding the portions of the allocation to be distributed to eligible entities; and

WHEREAS, Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties, within the Golden Crescent Region of Texas, were adversely affected by Hurricanes Harvey; and

WHEREAS, the Golden Crescent Region has been allocated \$18,430,647 in Local Buyout and Acquisition Program funds and \$36,044,589 in Local Infrastructure Program funds; and

WHEREAS, the Golden Crescent Regional Planning Commission is required to allocate 80% of the aforementioned funds to HUD identified Most Impacted Areas and 20% of the aforementioned funds to state identified Impacted Areas; and

A RESOLUTION AUTHORIZING THE ADOPTION AND SUBMISSION
OF THE GOLDEN CRESCENT REGIONAL METHODS OF DISTRIBUTION
FOR HURRICANE HARVEY (ROUND 1) COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY
FUNDS

WHEREAS, the Golden Crescent Regional Planning Commission is required to inform each eligible entity of the funding requirement that 70% of allocated funds must be utilized on low to moderate income projects; and

WHEREAS, the Golden Crescent Regional Planning Commission is responsible, with local input, for the development of methods of distribution for the allocation of Local Buyout and Acquisition Program and Local Infrastructure Program funds to local eligible entities; and

WHEREAS, the Golden Crescent Regional Planning Commission is required to allocate a minimum of \$1,000,000 of Local Buyout and Acquisition Program funds per eligible entity in order to adequately fund an entity's buyout and acquisition activities; and

WHEREAS, the Golden Crescent Regional Planning Commission is required to allocate a minimum of \$100,000 of Local Infrastructure Program funds per eligible county or city in order to adequately fund local infrastructure activities; and

WHEREAS, the Golden Crescent Regional Planning Commission is encouraged to incorporate a social vulnerability factor into its methods of distribution; and

WHEREAS, the Golden Crescent Regional Planning Commission, in facilitating the development of methods of distribution, may designate eligible entities to receive funds in order to meet minimum distribution requirement.

NOW, THEREFORE, BE IT RESOLVED THAT, the Golden Crescent Regional Planning Commission has held the required hearings and considered all input and hereby adopts the *Golden Crescent Regional Planning Commission Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation* and the resulting distribution of allocated funds set forth on Exhibit "A" which is attached hereto and incorporated herein by reference for all purposes; and

FURTHER RESOLVED, that Tramer J. Woytek, the President of the Golden Crescent Regional Planning Commission Board of Directors, be and he hereby is authorized, empowered, and directed, for and on behalf of the Commission, to execute and deliver to the Texas General Land Office a Method of Distribution Summary Form and to do any and all such additional acts and deliver and execute such certificates and other documents, instruments, and writings as he may deem necessary or advisable to effectuate the foregoing; and

FURTHER RESOLVED, that Tramer J. Woytek, be and he hereby is authorized to certify the foregoing resolutions and the incumbency and authority of President to execute the Method of Distribution Summary Form for and on behalf of his Regional Planning Commission.

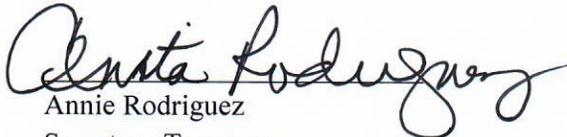
A RESOLUTION AUTHORIZING THE ADOPTION AND SUBMISSION
OF THE GOLDEN CRESCENT REGIONAL METHODS OF DISTRIBUTION
FOR HURRICANE HARVEY (ROUND 1) COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY
FUNDS

I do further certify that Tramer J. Woytek is the duly elected and serving President of the Golden Crescent Regional Planning Commission Board of Directors and that set forth below is a true and correct example of his signature:



Tramer J. Woytek, President
Golden Crescent Regional Planning Commission

WITNESS my hand and signature this 25th day of July, 2018.



Annie Rodriguez
Secretary-Treasurer
Golden Crescent Regional Planning Commission

Citizen Participation Plan



Citizen Participation Plan
COG Method of Distribution
Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information

Contact Information

Council of Government (COG): **Golden Crescent Regional Planning Commission (GCRPC)**

Principle Contact Name, Title: **Michael Ada; Director of Economic Development, Response, & Recovery**

Principle Contact Telephone: **(361) 578-1587 ext 204**

Principle Contact Email: **michaela@gcrpc.org**

Principle Contact Address: **1908 N. Laurent, Suite 600**

City, State, Zip: **Victoria, Texas 77901**

Citizen and Non-Governmental Organization Outreach

The COG will encourage citizens, with particular emphasis on persons of low-to-moderate income and other vulnerable populations to submit their views regarding community development and housing needs resulting from the disaster(s) in the following ways:

GCRPC will engage in Citizen and Non-Governmental Organization (NGO) outreach through 1) the GCRPC website, 2) public notices, and 3) press releases. Citizens and NGOs will be encouraged to review the GCRPC Method of Distribution (MOD) made available through the GCRPC website and participation in scheduled public hearings. Citizens and NGOs may submit written comments to the GCRPC via letter or email. Additionally, citizens and NGOs may comment when attending scheduled public hearings where comments will be recorded.

The following local organizations that provide services or housing for low-to-moderate income persons, including but not limited to, the local Public Housing Authorities, the local Health and Human Services offices, the local mental health and MHMR offices, Community Development Corporations and Community Housing Development Organizations, will receive written notification concerning the date, time, location and topics to be covered at the method of distribution public hearings:

Calhoun-Port Lavaca Housing Authority; Yoakum City Housing Authority; Cuero Housing Authority; Yorktown Housing Authority; Goliad Housing Authority; Gonzales Housing Authority; Jackson County Mauritz Village Apartments; Lavaca County Hallettsville Housing Authority; Victoria Housing Authority; Bluebonnet Trails Community Services; Gulf Bend Center; Devereux Victoria; Victoria Economic Development; Texas Health and Human Services Commission Offices (City of Port Lavaca – Calhoun County, City of Cuero – DeWitt County, and City of Victoria – Victoria, Goliad, Gonzales, Jackson, and Lavaca Counties)

The following organizations interested in fair housing issues and representing protected classes of individuals will be contacted to gain additional perspective on fair housing and civil rights issues in the region, and how the people they represent were affected by the disaster(s). Approaches beyond simple written notification of public hearings are required and detailed below:

Victoria Long Term Recovery Group; Texas Rio Grande Legal Aide – Victoria Law Center. In addition to written notification of the public hearings, the GCRPC will be releasing public hearing information to local media outlets (print and radio).

The COG acknowledges that language differences may play a role in effectively reaching non-English speaking residents. The COG will address these potential barriers by providing notification efforts as follows:

Notices of public hearings will be provided in English and Spanish text. Notices will be posted on the GCRPC website, in regional transit vehicles (Victoria Transit), the regional newspaper (The Victoria Advocate), the regional Spanish Language newspaper (Revista de Victoria), and forwarded to all cities and counties in the Golden Crescent Region to be posted in their respective public areas.

Public Hearing Content

The public hearings will include a discussion of the following topics:

- The development of housing and community development needs resulting from the disaster(s);
- The amount of funding available;
- All eligible activities under the Community Development Block Grant-Disaster Recovery program, including linking activities to the disaster(s) through direct damage or failure to function;
- Proposed objective factors;
- The COG's draft Method of Distribution.
- Any public comments received up to the date of each public hearing.
- Proposed responses to received public comments.

Required Meeting and Public Hearing Information

To the extent possible, the COG will adhere to the following schedule of hearings and notifications:

Posting of Draft Method of Distribution for Public Review

Date/Time: 6/3/2018 to 7/3/2018 Website Address: www.gcrpc.org

Public Hearings Scheduling Information

Public Planning Meeting – 1st Public Hearing

Date/Time: 6/18/2018 – 6:00 PM Location: Victoria Tower Conference Room, 1908 N. Laurent, 2nd Floor, Victoria, Texas 77901

2nd Public Hearing During Comment Period

Date/Time: 7/9/2018 – 6:00 PM Location: Victoria Tower Conference Room, 1908 N. Laruent, 2nd Floor, Victoria, Texas 77901

Notification consistent with GLO requirements will be provided on or before the following dates:

Dates Personal Notice of Hearings will be sent to entities: 6/4/2018, 6/15/2018, and 7/6/2018

Dates Notice of Hearings will be published on the COG's Website: 6/4/2018 through 7/9/2018

Dates Notice of Hearings will be published in regional newspaper(s): 6/3/2018, 6/17/2018, 6/24/2018, 7/1/2018, and 7/8/2018

The COG understands public hearings shall be held at a time and location compliant with the Americans with Disabilities Act, and convenient to potential or actual beneficiaries. The hearing must include accommodations for persons with disabilities.. The COG will accommodate these needs in the following ways:

Public hearing locations will be fully accessible to persons with disabilities. Public hearing announcements will include information on accessibility request for individuals requiring an interpreter, auxiliary aids, or other services.

The COG understands its responsibility to provide interpretive services when a significant number of non-English speaking residents can be reasonably expected to participate in the public hearing. If these services are determined to be necessary, the COG will address this need as follows:

Should a significant number of non-English residents be expected at any of the GCRPC's scheduled public hearings, Spanish interpreters will be in attendance to provide assistance.

Efforts Exceeding Minimum Participation Requirements

The GLO has encouraged the COG to seek public participation when developing the method of distribution. In pursuit of this goal, the COG held additional meetings and took other additional actions as follows:

In addition to the two public hearings required by GLO, the GCRPC will address MOD at its Board of Director's meetings scheduled for Wednesday, May 30, 2018, at 4:00 pm, and Wednesday June 27, 2018, at 4:00 pm. Public Comments will be received during these meetings.

Further, an updated draft version of the GCRPC MOD will be posted and maintained on the GCRPC website and available at the GCRPC offices for public review. The GCRPC will request that all local cities and counties post hearing notices in their public areas and have a copy of the MOD available for public review.

Meeting #1 Materials

**Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution**

PUBLIC HEARING #1 (1 OF 2)

**Monday, June 18, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901**

AGENDA

PLEASE SILENCE OR TURN OFF ANY CELL PHONES

I. Call Meeting to Order

II. Welcome

III. Introductions

IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary

V. Public Comment Period #1 Summary

VI. Open Forum/In-Person Public Comments

*Opportunity for citizens to provide in-person comments or suggestions regarding the Draft
GCRPC CDBG-DR Funding Method of Distribution*

VII. Public Hearing #2 (2 of 2)

Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901

VIII. Adjournment

U.S. Department of Housing and Urban Development
 Texas General Land Office, Community Development and Revitalization Program
 Golden Crescent Regional Planning Commission

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
 Regional/Local Methods of Distribution**

**Public Hearing #1 (1 of 2)
 SIGN-IN SHEET**

	Name (Print)	Signature	Public Comment	
			YES	NO
1	Betty Collier	<i>Betty Collier</i>		
2	BARBARA REESE	<i>Barbara Reese</i>		X
3	Kenneth Reese	<i>Kenneth Reese</i>		X
4	B. SPITZENBERG	<i>B. Spitzenberg</i>		X
5	JOHN KAMINSKI	<i>John Kaminski</i>		
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Golden Crescent Regional Planning Commission



**COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER
RECOVERY (CDBG-DR)**

FUNDING

METHOD OF DISTRIBUTION

PUBLIC HEARING #1

Golden Crescent Regional Planning Commission



**PLEASE REMEMBER TO SILENCE OR
TURN OFF ANY CELL PHONES**

Golden Crescent Regional Planning Commission



PUBLIC COMMENTS

- Public comments will be accepted in written and oral format
- Please fill out the appropriate form

Golden Crescent Regional Planning Commission



Restrooms

Agenda

- I. Call Meeting to Order
- II. Welcome
- III. Introductions
- IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary
- V. Public Comment Period #1 Summary
- VI. Open Forum/In-Person Public Comments
- VII. Public Hearing #2 (2 of 2)
- VIII. Adjournment

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

I. Call Meeting to Order

II. Welcome

III. Introductions

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

V. Public Comment Period #1 Summary

VI. Open Forum/In-Person Public Comments

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

VII. Public Hearing #2 (2 of 2)

Monday, July 9, 2018

6:00 p.m.

1908 N. Laurent

Victoria Tower Conference Room, 2nd Floor

Victoria, Texas 77901

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

VIII. Adjournment

Thank you.

**GOLDEN CRESCENT REGIONAL PLANNING COMMISSION (GCRPC)
PUBLIC COMMENT FORM**

Community Development Block Grant Disaster Recovery Funding – Methods of Distribution 2018

Witness Affirmation – Public Comment Form

UPON COMPLETION OF THIS FORM, PLEASE RETURN TO GCRPC STAFF.

PLEASE PRINT LEGIBLY.

I want to appear and offer testimony, in so appearing, I hereby make the following statements:

Date of Statement: _____ Location of Hearing: _____

My name is: _____

My occupation, profession or business is: _____

My mailing address is: _____

Phone: _____

In appearing before this body, I represent:

- myself or
- the following persons, firms, corporations, classes or groups:

Their business address is:

I wish to make the following written statements: (Attach additional sheet(s) if extra space is needed.)

- I support this Method of Distribution (MOD) for Community Development Block Grant Disaster Recovery Funding.
- I oppose this Method of Distribution (MOD) for Community Development Block Grant Disaster Recovery Funding.

I hereby certify that the above statements by me are true and accurate, and that I have listed all persons, firms, corporations, classes, or groups that I represent in reference to the matters on which I am appearing. I further certify that the testimony I give before this body will be true and accurate.

X

Signature of Witness

Note: At the discretion of the Department, the length of time available for each public comment may be limited.

**GOLDEN CRESCENT REGIONAL PLANNING COMMISSION
PUBLIC COMMENT FORM**

Community Development Block Grant Disaster Recovery Funding – Methods of Distribution 2018

My name is: _____
(please print)

I want to submit my opinion regarding Agenda Item No. _____, but I do **NOT** want to speak:

My position is:

APPROVE MOD as presented

DENY MOD as presented

Use back of form for other or additional written comment(s).

I am Representing:

Myself, my occupation, profession, business: _____

The following persons, firms, corporations, classes, groups: _____

Date: _____ **Signature of Witness:** _____

**GOLDEN CRESCENT REGIONAL PLANNING COMMISSION
PUBLIC COMMENT FORM**

Community Development Block Grant Disaster Recovery Funding – Methods of Distribution 2018

My name is: _____
(please print)

I want to submit my opinion regarding Agenda Item No. _____, but I do **NOT** want to speak:

My position is:

APPROVE MOD as presented

DENY MOD as presented

Use back of form for other or additional written comment(s).

I am Representing:

Myself, my occupation, profession, business: _____

The following persons, firms, corporations, classes, groups: _____

Date: _____ **Signature of Witness:** _____

**Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution**

PUBLIC HEARING #1 (1 OF 2)

**Monday, June 18, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901**

MINUTES

I. Call Meeting to Order – 6:00 p.m.

II. Welcome

GCRPC welcomed participants, reviewed hearing agenda, and explained public comment process (oral and written) to be utilized during the hearing.

III. Introductions

IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary

On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated \$5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

On April 10, 2018, the Texas General Land Office (GLO) allocated funding to the Golden Crescent Regional Planning Commission region, encompassing Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties, for the following three programs:

I. Homeowner Assistance Program

Funding Available:

\$55,938,689

Program Administration:

The GLO will administer this state-run program with the assistance of state-approved builders and contractors.

Eligible Activities:

This program will provide funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey.

II. Local Buyout and Acquisition Program (LBAP)

Funding Available:

\$18,430,647

Program Administration:

Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to all eligible entities (cities, counties, entities with eminent domain authority), per GLO and HUD requirements.

Eligible Activities:

Funds may be utilized to -

- buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner's out of harm's way to a lower-risk area;
- Relocation Assistance with buyout or acquisition activities;
- Down-payment Assistance with buyout or acquisition activities;
- Demolition;
- Activities designed to relocated families outside of floodplains;
- Public Service within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Match for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Incentive payments to households that move to disaster-impacted floodplains.

III. Local Infrastructure Program (LIP)

Funding Available:

\$36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program. GCRPC will develop a method of distribution to allocate funds to all cities and counties per GLO and HUD requirements.

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

Ineligible Activities:

- CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);

- Ensure the structure is accredited under the FEMA National Flood Insurance Program;
- Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
 - Funds may not be used to assist a privately-owned utility for any purpose;
 - Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
 - No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
 - By law, (codified in the HUD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is \$250,000 or less.

Draft Method(s) of Distribution:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities. The Draft Method(s) of Distribution serve as a launchpad from which all interested parties can begin the Method of Distribution development process. All participants approved.

V. Public Comment Period #1 Summary

GCRPC provided participants with an overview of the public notice methods utilized by GCRPC to encourage public participation and comment on the first draft of the Method(s) of Distribution. No public comments have been received to date.

VI. Open Forum/In-Person Public Comments

- BRUCE SPITZENGEL, *President, GrantWorks*

1. Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?

Response: Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

2. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

Response: Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

3. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.

Response: Comment recorded by GCRPC.

- JOHN KAMINSKI, *Assistant City Manager, City of Victoria*

1. When can public comments be submitted?

Response: At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018

2. Is there a required format for public comments?

Response: No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission staff in the task of recording and organizing any comments made.

No further discussion or comments were made regarding the Method(s) of Distribution.

VII. Public Hearing #2 (2 of 2)

Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901

VIII. Adjournment

7:00 p.m.

HUD – GLO – GCRPC
Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #1 – Public Comment(s) and Response(s) Overview

I. Public Comment(s) Received from June 6th through June 18th, 2018:

No public comments were received.

II. Oral Public Comment(s) Received and Responses Given During Public Hearing#1:

- BRUCE SPITZENGEL, *President, GrantWorks*

1. Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?

Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

2. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

3. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.

[No oral response provided. Comment recorded.]

- JOHN KAMINSKI, *Assistant City Manager, City of Victoria*

1. When can public comments be submitted?

At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018

2. Is there a required format for public comments?

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**U.S. Department of Housing and Urban Development
Texas General Land Office, Community Development & Revitalization
Golden Crescent Regional Planning Commission**

Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #1 - FACT SHEET

On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated \$5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

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I. Homeowner Assistance Program

Funding Available:

\$55,938,689

Program Administration:

The GLO will administer this state-run program with the assistance of state-approved builders and contractors.

Eligible Activities:

This program will provide funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey.

II. Local Buyout and Acquisition Program (LBAP)

Funding Available:

\$18,430,647

Program Administration:

Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to all eligible entities (cities, counties, entities with eminent domain authority), per GLO and HUD requirements.

Eligible Activities:

Funds may be utilized to -

- buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner’s out of harm’s way to a lower-risk area;
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- Down-payment Assistance with buyout or acquisition activities;
- Demolition;
- Activities designed to relocated families outside of floodplains;
- Public Service within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Match for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Incentive payments to households that move to disaster-impacted floodplains.

III. Local Infrastructure Program (LIP)

Funding Available:

\$36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program. GCRPC will develop a method of distribution to allocate funds to all cities and counties per GLO and HUD requirements.

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
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 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non- Federal Flood Control Projects);
 - Ensure the structure is accredited under the FEMA National Flood Insurance Program;
 - Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- Funds may not be used to assist a privately-owned utility for any purpose;
- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the

Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

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

Draft Method(s) of Distribution:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities.

Public Comments Received:

No public comments have been received to date.

Public Comment(s) Responses:

No responses at this time.

Meeting #2 Materials

**Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution**

PUBLIC HEARING #2 (2 OF 2)

**Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901**

AGENDA

PLEASE SILENCE OR TURN OFF ANY CELL PHONES

- I. Call Meeting to Order**
- II. Welcome**
- III. Introductions**
- IV. 2nd Draft GCRPC CDBG-DR Funding Method of Distribution Summary**
- V. Public Comment Period #1 Summary**
- VI. Public Comment Period #2 Summary**
- VII. Open Forum/In-Person Public Comments**
*Opportunity for citizens to provide in-person comments or suggestions regarding the Draft
GCRPC CDBG-DR Funding Method of Distribution*
- VIII. Final Draft, Board of Directors Approval, and Submission**
- IX. Adjournment**

U.S. Department of Housing and Urban Development
 Texas General Land Office, Community Development and Revitalization Program
 Golden Crescent Regional Planning Commission

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
 Regional/Local Methods of Distribution**

**Public Hearing #2 (2 of 2)
 SIGN-IN SHEET**

	Name (Print)	Signature	Public Comment	
			YES	NO
1	BARBARA REESE	Barbara Reese		✓
2	Kenneth Reese	Kenneth Reese		✓
3	Marett Hanes	Marett Hanes		✓
4	Dina Hardwick	Dina Hardwick	✓	
5	Stacy Kirkham	Stacy Kirkham	✓	
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Golden Crescent Regional Planning Commission



**COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER
RECOVERY (CDBG-DR) FUNDING
METHODS OF DISTRIBUTION**

PUBLIC HEARING #2

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

I. Call Meeting to Order

Agenda

- I. Call Meeting to Order
- II. Welcome
- III. Introductions
- IV. 2nd Draft GCRPC CDBG-DR Funding Method of Distribution Summary
- V. Public Comment Period #1 Summary
- VI. Public Commend Period #2 Summary
- VII. Open Forum/In-Person Public Comments
- VIII. Final Draft, Board of Directors Approval, and Submission
- IX. Adjournment

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

II. Welcome

Golden Crescent Regional Planning Commission



**PLEASE REMEMBER TO SILENCE OR
TURN OFF ANY CELL PHONES**

Golden Crescent Regional Planning Commission



Restrooms

Golden Crescent Regional Planning Commission



PUBLIC COMMENTS

- Public comments will be accepted in written and oral format
- Please fill out the appropriate form

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

III. Introductions

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

**IV. 2nd Draft GCRPC CDBG-DR
Funding Method of Distribution
Summary**

**Community Development Block Grant – Disaster Recovery
(CDBG-DR) Funding
Regional/Local Methods of Distribution**

Programs

1. Homeowner Assistance Program
2. Local Buyout and Acquisition Program (LBAP)
3. Local Infrastructure Program (LIP)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total
Homeowner Assistance Program	\$ 32,657,218	\$ 23,281,471	\$ 39,157,082	\$ 55,938,689
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589
<i>sub-totals</i>	\$ 59,689,864	\$ 50,724,061	\$ 77,289,748	
	Total Regional Allocation			\$ 110,413,925

1. Homeowner Assistance Program

\$55,938,689

Eligible Activities:

funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey

Program Administration:

Texas General Land Office

2. Local Buyout and Acquisition Program (LBAP)

\$ 18,430,647

Program Administration:

Local units of government and entities with eminent domain authority will administer this program.

2. Local Buyout and Acquisition Program (LBAP)

Eligible Activities:

- Buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner's out of harm's way to a lower-risk area;
- Relocation Assistance with buyout or acquisition activities;
- Down-payment Assistance with buyout or acquisition activities;
- Demolition;
- Activities designed to relocate families outside of floodplains;
- Public Service within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Match for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Incentive payments to households that move to disaster-impacted floodplains.

2. Local Buyout and Acquisition Program (LBAP)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total
Local Buyout/Acquisition Program	\$ 8,606,577	\$ 9,824,070	\$ 12,901,453	\$ 18,430,647

2. Local Buyout and Acquisition Program (LBAP)

Method of Distribution Factors, Data, & Parameters:

- U.S. Census Bureau Population Data
- Unmet Need Calculations
- *FEMA Individual Assistance Data*
- Social Vulnerability Data
- Resiliency Factor
- 50/40/10 Weighted Distribution Factors

Required \$1,000,000 minimum allocation

2. Local Buyout and Acquisition Program (LBAP)

		Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes	
#	COG		
1	GCRPC	Victoria County (Excluding City of Victoria)	\$ 2,545,545
2	GCRPC		<i>City of Victoria</i> \$ 2,441,508
3	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	\$ 1,858,095
4	GCRPC		<i>City of Port Lavaca (77979)</i> \$ 1,761,429
			80% LBAP Sub-total \$ 8,606,577

		Initial 20% Allocation of Funds for HUD Impacted Counties	
#	COG		
5	GCRPC	Calhoun County	\$ 2,124,398
6	GCRPC	DeWitt County	\$ 1,952,614
7	GCRPC	Goliad County	\$ 1,583,333
8	GCRPC	Gonzales County	\$ 1,667,714
9	GCRPC	Jackson County	\$ 1,297,010
10	GCRPC	Lavaca County	\$ 1,199,001
			20% LBAP Sub-Total \$ 9,824,070

3. Local Infrastructure Program (LIP)

\$ 36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program.

3. Local Infrastructure Program (LIP)

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

3. Local Infrastructure Program (LIP)

Ineligible Activities:

- CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
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- By law, (codified in the HUD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is \$250,000 or less.

3. Local Infrastructure Program (LIP)

Program	HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total
Local Infrastructure Program	\$ 18,426,069	\$ 17,618,520	\$ 25,231,212	\$ 36,044,589

3. Local Infrastructure Program (LIP)

#	COG	Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes	
1	GCRPC	Victoria County (Excluding City of Victoria)	\$ 3,515,651
2	GCRPC	<i>City of Victoria</i>	\$ 6,056,722
3	GCRPC	77979 Calhoun County (Excluding City of Port Lavaca)	\$ 3,740,301
4	GCRPC	<i>City of Port Lavaca (77979)</i>	\$ 5,113,395
80% LIP Sub-Total			\$ 18,426,069

3. Local Infrastructure Program (LIP)

#	COG	Initial 20% Allocation of Funds for HUD Impacted Counties	
5	GCRPC	Calhoun County (Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)	\$ 2,196,247
6	GCRPC		<i>City of Point Comfort</i> \$ 1,031,252
7	GCRPC		<i>City of Seadrift</i> \$ 1,536,581
8	GCRPC	DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)	\$ 866,608
9	GCRPC		<i>City of Cuero</i> \$ 1,426,977
10	GCRPC		<i>City of Yoakum</i> \$ 1,416,383
11	GCRPC		<i>City of Yorktown</i> \$ 793,105
12	GCRPC	Goliad County (Excluding City of Goliad)	\$ 723,030
13	GCRPC		<i>City of Goliad</i> \$ 477,108
14	GCRPC	Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)	\$ 903,466
15	GCRPC		<i>City of Gonzales</i> \$ 852,300
16	GCRPC		<i>City of Nixon</i> \$ 671,903
17	GCRPC		<i>City of Smiley</i> \$ 595,907
18	GCRPC		<i>City of Waelder</i> \$ 623,785
19	GCRPC	Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)	\$ 840,270
20	GCRPC		<i>City of Edna</i> \$ 730,897
21	GCRPC		<i>City of Ganado</i> \$ 418,493
22	GCRPC		<i>City of La Ward</i> \$ 297,827
23	GCRPC	Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)	\$ 400,454
24	GCRPC		<i>City of Hallettsville</i> \$ 279,939
25	GCRPC		<i>City of Moulton</i> \$ 263,295
26	GCRPC		<i>City of Shiner</i> \$ 272,693
			20% LIP Sub-Total \$ 17,618,520

GCRPC LIP Grand Total(s) \$ 36,044,589

3. Local Infrastructure Program (LIP)

Method of Distribution Factors, Data, Parameters:

- U.S. Census Bureau Population Data
- Unmet Need Calculations
- *FEMA Public Assistance Data*
- Social Vulnerability Data
- Resiliency Factor
- 50/40/10 Weighted Distribution

Required \$100,000 minimum allocation

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

V. Public Comment Period #1 Summary

V. Public Comment Period #1 Summary

- No Public Comments received from June 6th
through June 18th, 2018.
- Public Hearing #1 – Public Comments

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VI. Public Comment Period #2 Summary

VI. Public Comment Period #2 Summary

Public Comments Received between June 19th & July 9th,
2018:

- City of Victoria
- Victoria Office of Emergency Management
- Texas Rio Grand Legal Aid, Inc. (Corpus Christi – Pueblo Office)

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VII. Open Forum/In-Person Public Comments

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VIII. Final Draft, Board of Directors Approval, and Submission

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

IX. Adjournment

**Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution**

PUBLIC HEARING #2 (2 OF 2)

**Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901**

MINUTES

I. Call Meeting to Order – 6:05 p.m.

II. Welcome

GCRPC welcomed participants, reviewed hearing agenda, and explained public comment process (oral and written) to be utilized during the hearing.

III. Introductions

IV. 2nd Draft GCRPC CDBG-DR Funding Method of Distribution Summary

On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated \$5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

On April 10, 2018, the Texas General Land Office (GLO) allocated funding to the Golden Crescent Regional Planning Commission region, encompassing Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties, for the following three programs:

I. HOMEOWNER ASSISTANCE PROGRAM

Funding Available:
\$55,938,689

Program Administration:
The GLO will administer this state-run program with the assistance of state-approved builders and contractors.

Eligible Activities:
This program will provide funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey.

II. LOCAL BUYOUT AND ACQUISITION PROGRAM (LBAP)

Funding Available:
\$18,430,647

Program Administration:

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to eligible entities per GLO and HUD requirements.

Eligible Activities:

Funds may be utilized to -

- Buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner's out of harm's way to a lower-risk area;
- Provide relocation Assistance with buyout or acquisition activities;
- Provide down-payment Assistance with buyout or acquisition activities;
- Conduct demolition activities;
- Conduct activities designed to relocated families outside of floodplains;
- Provide public service activities within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Provide matching funds for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Provide incentive payments to households that move to disaster-impacted floodplains.

III. LOCAL INFRASTRUCTURE PROGRAM (LIP)

Funding Available:

\$36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program. GCRPC will develop a method of distribution to allocate funds to all cities and counties per GLO and HUD requirements.

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within a 15% cap).

Ineligible Activities:

- CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

- Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
- Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non- Federal Flood Control Projects);
- Ensure the structure is accredited under the FEMA National Flood Insurance Program;
- Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- Funds may not be used to assist a privately-owned utility for any purpose;
- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
- By law, (codified in the HUD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is \$250,000 or less.

IV. DRAFT METHOD(S) OF DISTRIBUTION UPDATE:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities.

Subsequent to the first public planning meeting, additional guidance was provided by the General Land Office in response to Public Hearing #1 comments and questions. This resulted in the following changes to final allocations of funding for the Local Buyout and Acquisition Program eligible entities in the 20% HUD Impacted Counties group:

The distribution methodology for the 20% Allocation group allocated amounts below the minimum required allocation to eligible entities (\$1,000,000 per entity) due to the high number of eligible entities (Total of 62 eligible entities) and the amount of funds allocated to GCRPC for the Local Buyout and Acquisition Program (\$9,824,070). The GCRPC region would require a minimum funding allocation of \$62,000,000, for the Local Buyout and Acquisition Program alone, in order to meet the GLO's minimum funding requirements.

Additional allocation methods required consideration as a result of the minimum required allocation and the number of eligible entities. An allocation that

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

adheres to HUD and GLO requirements was achieved for the 20% Allocation group by limiting the regional allocation to only eligible counties while still providing for the continued LBAP eligibility of cities and eminent domain authority entities through partnerships with eligible counties.

As previously stated, in order to achieve an equitable distribution of the limited funding provided, final allocation amounts reflect the sum of the \$1,000,000 floor plus the sum of the percentage distribution based on the 50-40-10 model; without reference to the “Allocation Amount Using the 50-40-10 Model Without Imposed Distributional Constraints” column. This provides all eligible entities with an allocation that reduces “Unmet Need Plus Resiliency Removing Any Overlap” totals in a more holistic, or regional, manner.

All participants agreed to changes and update to the Method(s) of Distribution.

V. Public Comment Period #1 Summary

No public comments were received during the first public comment period commencing on June 6, 2018, through June 18, 2018; the date of the first public hearing and planning meeting. The following comments and responses were made during the first public hearing:

- **BRUCE SPITZENGEL**, President, GrantWorks

A. Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?

Response: Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

B. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

Response: Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

C. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.

No oral response provided. Comment recorded.

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria

A. When can public comments be submitted?

Response: At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

B. Is there a required format for public comments?

Response: No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission (GCRPC) staff in the task of recording and organizing any comments made.

VI. Public Comment Period #2 Summary

During the second public comment period (June 19, 2018 through July 9, 2018) the following public comments were received:

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria, *received 6/27/2018 via letter*

Copies of the letter were provided to participants for review. Mr. Kaminski was thanked for the submission of the comments and the comments were recorded.

- **RICK MCBRAYER**, Emergency Management Coordinator, Victoria Office of Emergency Management, *received 7/3/2018 via email*

A. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?

Response: Entities with eminent domain authority within the region were compiled using the Texas Comptroller's Online Eminent Domain Database (COEDD). <https://coedd.comptroller.texas.gov/>.

Bloomington ISD, local water control districts, and The Port of Victoria are either 1) Non-compliant with Texas Government Code, Chapter 2206, Subchapter D, or 2) they do not have eminent domain authority.

The Comptroller's database only provides info on **compliant** entities.

Example: Quail Creek MUD is listed as having an Eminent Domain function with TCEQ; However, they are not included in the Comptroller's database.

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the MOD.

GCRPC received additional comments that could not be responded to, prior to today's meeting:

- 1) Hannah Dyal, Staff Attorney at Texas RioGrande Legal Aid, Pueblo Law Center. Email received this morning, July 9, 2018, at 7:43 a.m..

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

- 2) Brennan Griffin, Deputy Director, Texas Appleseed. Email received July 9, 2018, at 4:33 p.m.

GCRPC will distribute and post all comments and any responses for public review subsequent to today's meeting.

VII. Open Forum/In-Person Public Comments

- **Dina Hardwick, Texas RioGrande Legal Aid**

A. How is Low to Moderate Income (LMI) status calculated?

Response: 70% of allocated funds must benefit 51% or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI). Census block groups that have a LMI population of 51 percent or more have been identified using HUD's 2017 Low- and Moderate-Income Summary Data.

B. Who decides if pre-storm or post-storm market value will be utilized in the Local Buyout and Acquisition program?

Response: Each entity administering a Local Buyout and Acquisition program will determine which value to utilize.

C. The GLO is currently conducting a Housing Needs Assessment with the assistance of the University of Texas at Austin; where and how will the resulting data from the assessment be utilized?

Response: For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Marett Hanes,**

A. What department from the University of Texas at Austin is conducting the Housing Needs Assessment?

Response: The University of Texas at Austin, IC² Institute, Bureau of Business Research. For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Stacy Kirkham, City of Seadrift Resident**

A. What happens if the GLO or HUD determines there are deficiencies or issues with the submitted GCRPC Method of Distribution?

Response: GLO will inform GCRPC of any deficiencies and provide guidance on how deficiencies may be addressed.

B. How long will the HUD-GLO review take?

Response: The deadline for submission of MODs is Friday, July 13, 2018. GLO has estimated they may begin responding as early as the last week of July.

Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

C. When will funding be awarded to eligible entities/communities?

Response: Eligible entities will be required to submit project proposals to the GLO. Guidance regarding project proposal format will be provided by GLO. Awards will follow review and approval of an eligible entity's proposed projects.

No further discussion or comments were made regarding the Method(s) of Distribution.

VIII. Final Draft, Board of Directors Approval, and Submission

The final draft of the Method(s) of Distribution agreed upon and finalized today will be submitted to the GLO on July 13, 2018, as a final draft pending Board approval. The GCRPC Board of Directors will be provided the final draft of the Method(s) of Distribution for review and approval at their monthly meeting scheduled for July 25, 2018.

IX. Adjournment - 7:20 p.m.

**U.S. Department of Housing and Urban Development
Texas General Land Office, Community Development & Revitalization
Golden Crescent Regional Planning Commission**

Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #2 - FACT SHEET

On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated \$5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

On April 10, 2018, the Texas General Land Office (GLO) allocated funding to the Golden Crescent Regional Planning Commission region, encompassing Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties, for the following three programs:

I. Homeowner Assistance Program

Funding Available:

\$55,938,689

Program Administration:

The GLO will administer this state-run program with the assistance of state-approved builders and contractors.

Eligible Activities:

This program will provide funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey.

II. Local Buyout and Acquisition Program (LBAP)

Funding Available:

\$18,430,647

Program Administration:

Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to eligible entities per GLO and HUD requirements.

Eligible Activities:

Funds may be utilized to -

- buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner’s out of harm’s way to a lower-risk area;
- Relocation Assistance with buyout or acquisition activities;
- Down-payment Assistance with buyout or acquisition activities;
- Demolition;
- Activities designed to relocated families outside of floodplains;
- Public Service within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Match for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Incentive payments to households that move to disaster-impacted floodplains.

III. Local Infrastructure Program (LIP)

Funding Available:

\$36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program. GCRPC will develop a method of distribution to allocate funds to all cities and counties per GLO and HUD requirements.

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

Ineligible Activities:

- CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
 - Ensure the structure is accredited under the FEMA National Flood Insurance Program;
 - Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- Funds may not be used to assist a privately-owned utility for any purpose;
- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the

Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

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

Draft Method(s) of Distribution:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities.

Public Comment(s) and Response(s):

I. Public Comment(s) Received from June 6th through June 18th, 2018:

No public comments were received.

II. Oral Public Comment(s) Received and Responses Given During Public Hearing#1:

- BRUCE SPITZENGEL, *President, GrantWorks*

1. Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?

Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

2. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

3. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.

[No oral response provided. Comment recorded.]

- JOHN KAMINSKI, *Assistant City Manager, City of Victoria*

1. When can public comments be submitted?

At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018

2. Is there a required format for public comments?

No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission staff in the task of recording and organizing any comments made.

III. Public Comment(s) Received from June 19th through July 9th, 2018:



June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1908 N. Laurent Street
Victoria, TX 77901

Re: Public Comments on Proposed GCRPC Method of Distribution (MOD) – Hurricane Harvey CDBG-DR LBAP and LIP Funding

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled "1.06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf", primarily address and clarify which entities are eligible to receive funds for the Local Buyout/Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

The City of Victoria has one additional comment on the revised version of the proposed MOD. Our comment is in regards to the proposed reallocation method for LBAP and LIP funds. The revised MOD states "Reallocation of LBAP funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region." The same language is repeated in the reallocation paragraph for LIP funds. It is respectfully requested that the GLO consider first reallocating such funds at the County level before returning them to the region-wide 80% pool.

Within Victoria County, the City and County of Victoria are the only two entities to receive LBAP and LIP funding through the revised MOD. It is our belief that if either of these two entities fails to utilize their full allocation of funds, the other entity within the County should have an opportunity to apply for such de-obligated funds before they are rolled back into the region-wide 80% allocation.

Thank you for the opportunity to submit public comments and thank you for your ongoing efforts to assist local entities within the Golden Crescent Region with the implementation of post-Harvey disaster recovery programs.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John K. Kaminski".

John K. Kaminski
Assistant City Manager

P.O. BOX 1758 VICTORIA, TX 77902
PHONE (361) 485-3030 • FAX (361) 485-3534
www.victoriatx.org

7/3/2018 – Rick McBrayer, Emergency Management Coordinator, Victoria Office of Emergency Management

1. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?

Entities with eminent domain authority within the region were compiled using the Texas Comptroller's Online Eminent Domain Database (COEDD). <https://coedd.comptroller.texas.gov/>.

Bloomington ISD, local water control districts, and The Port of Victoria are either 1) Non-compliant with Texas Government Code, Chapter 2206, Subchapter D, or 2) they do not have eminent domain authority.

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Example: Quail Creek MUD is listed as having an Eminent Domain function with TCEQ; However, they are not included in the Comptroller's database.

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the Method of Distribution.

**U.S. Department of Housing and Urban Development
Texas General Land Office, Community Development & Revitalization
Golden Crescent Regional Planning Commission**

Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #2 - FACT SHEET

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- Conduct activities designed to relocated families outside of floodplains;
- Provide public service activities within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
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Ineligible Activities:

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- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within a 15% cap).

Ineligible Activities:

- CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Rehabilitation Program (Rehabilitation Assistance for Non- Federal Flood Control Projects);
 - Ensure the structure is accredited under the FEMA National Flood Insurance Program;
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- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
- By law, (codified in the HUD Act as a note to 105(a)), the amount of CDBG-DR funds that may be contributed to a USACE project is \$250,000 or less.

IV. DRAFT METHOD(S) OF DISTRIBUTION:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities.

V. PUBLIC COMMENT(S) AND RESPONSE(S):

1. Public Comment(s) Received from June 6th through June 18th, 2018:

No public comments were received.

2. Oral Public Comment(s) Received and Responses Given During Public Hearing#1:

- **BRUCE SPITZENGEL**, President, GrantWorks
 - A. **Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?**

Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

- B. **What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?**

Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

- C. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.**

[No oral response provided. Comment recorded.]

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria

- A. When can public comments be submitted?**

At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

- B. Is there a required format for public comments?**

No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission staff in the task of recording and organizing any comments made.

3. **Public Comment(s) Received from June 19th through July 9th, 2018:**

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria, *received 6/27/2018 via letter*



June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1908 N. Laurent Street
Victoria, TX 77901

Re: Public Comments on Proposed GCRPC Method of Distribution (MOD) – Hurricane Harvey CDBG-DR LBAP and LIP Funding

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled "1.06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf", primarily address and clarify which entities are eligible to receive funds for the Local Buyout/Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

The City of Victoria has one additional comment on the revised version of the proposed MOD. Our comment is in regards to the proposed reallocation method for LBAP and LIP funds. The revised MOD states "Reallocation of LBAP funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region." The same language is repeated in the reallocation paragraph for LIP funds. It is respectfully requested that the GLO consider first reallocating such funds at the County level before returning them to the region-wide 80% pool.

Within Victoria County, the City and County of Victoria are the only two entities to receive LBAP and LIP funding through the revised MOD. It is our belief that if either of these two entities fails to utilize their full allocation of funds, the other entity within the County should have an opportunity to apply for such de-obligated funds before they are rolled back into the region-wide 80% allocation.

Thank you for the opportunity to submit public comments and thank you for your ongoing efforts to assist local entities within the Golden Crescent Region with the implementation of post-Harvey disaster recovery programs.

Respectfully submitted,

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John K. Kaminski
Assistant City Manager

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PHONE (361) 485-3030 • FAX (361) 485-3534
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- **RICK MCBRAYER**, Emergency Management Coordinator, Victoria Office of Emergency Management, *received 7/3/2018 via email*

1. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?

Entities with eminent domain authority within the region were compiled using the Texas Comptroller's Online Eminent Domain Database (COEDD). <https://coedd.comptroller.texas.gov/>.

Bloomington ISD, local water control districts, and The Port of Victoria are either 1) Non-compliant with Texas Government Code, Chapter 2206, Subchapter D, or 2) they do not have eminent domain authority.

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Example: Quail Creek MUD is listed as having an Eminent Domain function with TCEQ; However, they are not included in the Comptroller's database.

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the Method of Distribution.

- **HANNAH DYAL, Staff Attorney**, Texas RioGrande Legal Aid, Corpus Christi, received 7/9/2018 via email/attached letter.

1. GCRPC should conduct a regional needs assessment to better understand the extent of damage in the GCRPC eligible counties and meet its goal of equitable regional recovery

In its allocation methodology, GCRPC calculates FEMA Verified Loss figures for those individuals who filed FEMA claims following Hurricane Harvey. These figures likely misrepresent the extent of damage experienced by low-income property owners and thus is building a bias against the damage done to low-income neighborhoods into its allocation methods.

Data obtained by Texas Housers, an organization dedicated to supporting Texans in the pursuit of affordable and accessible housing throughout the State, indicates that the average value of FVL increases as the income of a household increases.¹ For homeowners who earn 30% or less of area median income the state-wide average for FVL was \$7,028 which is just less than half that for non-LMI households.² Any attempt to explain the

¹Housers SAP comments, 7.

²HSAP coms 7.

discrepancy in these figures would be conjectures as very little is publicly available as to what goes into an FVL determination.³

Despite the disparity in damage FVL data indicates, LMI household are just as, if not more, likely to experience devastation as a result of flooding than their wealthier counterparts.⁴ This is true for the low-income household of Texas following Hurricane Harvey. In the coastal counties impacted by the storm, households of color and low-income households were more likely to be impacted by property damage or loss.⁵ This means that any county with wealthier households impacted by the storm is likely favored in the outcome of GCRPC's calculations.

An equitable recovery plan requires an allocation methodology that recognizes the flaws in existing data sets. It should seek to correct any unintentional biases that may be present in the available figures. Instead of relying on just the FVL figures to allocate funds, it should conduct a regional needs assessment to better evaluate whether the extent to which properties were rendered inhabitable as a result of the storm. The GLO's draft Housing Guidelines permit COGs to use qualified data sources approved by GLO in advance in their needs assessments.⁶ These include SBA or Insurance awards, as well as other forms of data. GCRPC should make an effort to quantify damage beyond the flawed FVL figures it is currently relying on. In doing so has it will design a methodology that captures the full extent of damage inflicted because of Harvey.

2. The MOD should establish criteria for areas to qualify for buyout programs.

The MOD draft does not articulate criteria to determine which areas qualify for buyouts. In its State Action Plan, the General Land Office tasked the regional Councils of Government (COGs) with "establish[ing] objective criteria for allocation of funds to eligible entities and activities".⁷ Although the current MOD draft uses data to prioritize funding for the four counties in its area (the eligible entities), it establishes no criteria to allocate funds to buyout activities.

GCRPC's current method of allocation considers the total harm that each county experienced. Although this method attempts to equitably distribute funds by prioritizing those counties which experienced a greater amount of harm, the method does not give GCRPC the flexibility to determine the actual needs of the populations of each of these counties and whether buyout/acquisition programs will meet those needs.⁸ GCRPC's allocation method would be more sensible and equitable if it were tasked with allocating funds for all housing programs. However, GCRPC only needs to allocate those funds intended for only the buyout and acquisition

³ FEMA defines "verified loss" as "the total dollar amount of IHP-eligible real or personal property items of average quality, size, and capacity, as verified by FEMA"; an ambiguous and circuitous definition to say the least. IAPP-G, 67.

⁴ <https://www.brookings.edu/blog/social-mobility-memos/2017/09/18/hurricanes-hit-the-poor-the-hardest/>

⁵ <http://files.kff.org/attachment/Report-An-Early-Assessment-of-Hurricane-Harveys-Impact-on-Vulnerable-Texans-in-the-Gulf>

⁶ HG 13.

⁷ Texas General Land Office, State Action Plan at 79.

⁸ GCRPC is required to allocate funds in a way that will satisfy "unmet needs." SAP at 79

portion of the state housing programs. The allocation methodology should therefore be structured to identify which counties are most in need of buyout and acquisition funds

Establishing program criteria for buyouts would enable GCRPC to identify areas in the counties that qualify for the buyout program based on need, prioritize those in its buyout fund allocation, and estimate the cost of a buyout program. GCRPC can then use its limited funds to target the areas that stand to benefit the most from acquisition.

Buyout program eligibility criteria should focus on achieving two goals: meeting the GLO's stated objectives of the buyout program, and meeting the national objective to support lower-income households. First, According to the GLO, buyouts serve to (1) provide resiliency over rebuilding in a floodplain; (2) prevent repetitive loss; and (3) end extreme risk to health and human safety.⁹ GCRPC should establish criteria for buyouts that target these three objectives. For example, it could require that areas targeted for buyouts (1) be in a floodplain; (2) demonstrate housing damage due to Hurricane Harvey, as well as from prior recent floods; and (3) the flooding from Hurricane Harvey caused an extreme risk to health and human safety in that area from flood waters reaching several feet.

Second, buyout programs should be designed to meet the national objective that 70% of all CDBG-DR funds benefit Low-to-Moderate Income (LMI) Households. To do this, GCRPC could set criteria that areas are only eligible for or receive priority for buyouts if at least 70% of the households targeted for a buyout are LMI. Such criteria would help CAPCOG identify those counties or cities in need of buyouts, as opposed to those in need of the individual homeownership programs available through the state.

3. The MOD should standardize the benefits provided in buyout programs

According to the State Action Plan, subrecipients are required to develop guidelines, regulations, maximum assistance levels, target areas, and additional eligibility requirements for program.¹⁰ The current MOD sets no standards for the benefits required in a buyout program. In its MOD, GCRPC should establish those program requirements that ensure individual households are provided with the assistance necessary to relocate to a comparable home, such as relocation assistance, down payment assistance, and relocation consultation services. These benefits should be available to all qualified persons, but can be denied to individuals who have already received similar assistance in order to avoid duplication of benefits.

Through standardization of benefits and services, GCRPC guarantees that residents in each county are treated in the same manner and avoids potential unintentional discriminatory impacts to residents depending on

⁹ SAP at 17.

¹⁰ SAP at 80. The Housing Guidelines include the COGs in its definition of "subrecipients". HG at 11.

their county or city.

Conclusion

GCRPC has the opportunity to be on the forefront of disaster recovery planning. It has the opportunity to realize that there are communities within its region that have been ignored time and again after a storm and for whom the political will to mitigate the impacts of disasters does not exist. It has the opportunity to hear the voices of those impacted. By taking a more considerate and inclusive look at the damage caused by Hurricane Harvey, instead of using FEMA's flawed methods, GCRPC will be able to impact these communities for the better for decades to come.

1. GCRPC should conduct a regional needs assessment to better understand the extent of damage in the GCRPC eligible counties and meet its goal of equitable regional recovery

Comment 1. GCRPC Response:

*The Golden Crescent Regional Planning Commission (GCRPC) is a voluntary association of local governments within the seven-county region of Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties. GCRPC was tasked by the Texas General Land Office (GLO) to develop a public participation plan and facilitate the Methods of Distribution (MOD) development process. GCRPC was given approximately sixty (60) calendar days to complete the task with parameters set forth in the document entitled "Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines," available for review at <http://www.gcrpc.org/gcrpc-PublicHearing.html>. The guidance provides that "[e]ach COG will be provided data sets produced by the GLO in partnership with the University of Texas at Austin to inform methods of distribution[;] [v]ariences from these data sets will be allowable."*¹

While the use of data produced by "[c]onduct[ing] a regional needs assessment to better evaluate whether the extent to which properties were rendered inhabitable as result of the storm [sic]" is allowable, this suggested GCRPC activity falls outside of the scope of work tasked to GCRPC by the GLO.

Additionally, GCRPC is in possession of Small Business Administration and Insurance award data provided by, and pre-approved for use by, the GLO. However, the suggestion for use of such data does not provide a solution to incorporate new data into currently developed Method of Distribution formulas.

2. The MOD should establish criteria for areas to qualify for buyout programs.

Comment #2 response:

The Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines provide:

¹Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines at 6.

“1. Local Buyout and Acquisition Program

The local buyout and acquisition program will remove homes from harm’s way. [sic]

- a. Local MOD Requirements:*
 - i. Each COG will facilitate a MOD process with support of the GLO;*
 - ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);*
 - iii. Citizen participation process:*
 - 1. Develop a citizen participation plan;*
 - 2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;*
 - 3. One (1) public hearing shall be a “Public Planning Meeting;”*
 - 4. Ensure a public comment period of at least 14 days.*
 - iv. Implement a minimum of \$1,000,000 in CDGB-DR funds to any local entity receiving funding through the MOD*
 - v. Ensure a minimum percentage of funds are allocated to the HUD most impacted and distressed counties and zip codes;*
 - vi. Facilitate local prioritization through the MOD;*
 - vii. Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region;*
 - viii. A plan to meet the 70 percent low- and moderate-income benefit requirement;*
 - ix. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.”*

GCRPC has established the draft objective criteria for allocation of funds to the various eligible entities according to the GLO requirements stated above. Population data, FEMA Individual Assistance Data, Unmet Need calculations, Social Vulnerability data, and a resilience factor are the objective criteria utilized.

The current draft MODs distribute funds to all eligible entities for all eligible activities in order to provide eligible entities with maximum flexibility to administer their local programs. Conditions of funding for all eligible entities include the requirement that any entity use 70% of its allocation to benefit Low-to-Moderate Income households, as well as, the requirement that funding be utilized to address HUD and GLO priorities as stated in the Federal Register and State Action Plan.

3. The MOD should standardize the benefits provided in buyout programs

Comment #3 response:

GCRPC is not a sub-recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds. Thus, this comment goes beyond the scope of GCRPC's current task(s). Per GLO guidance, eligible entities identified in the MODs are the planned subrecipients tasked with administration of funds for each program. Funding is conditioned on each eligible entity administering these programs in adherence to HUD & GLO priorities, requirements, and guidelines.

All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.

**U.S. Department of Housing and Urban Development
Texas General Land Office, Community Development & Revitalization
Golden Crescent Regional Planning Commission**

Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #2 - FACT SHEET & COMMENT REVIEW

On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated \$5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

On April 10, 2018, the Texas General Land Office (GLO) allocated funding to the Golden Crescent Regional Planning Commission region, encompassing Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties, for the following three programs:

I. HOMEOWNER ASSISTANCE PROGRAM

Funding Available:

\$55,938,689

Program Administration:

The GLO will administer this state-run program with the assistance of state-approved builders and contractors.

Eligible Activities:

This program will provide funding for rehabilitation and reconstruction of owner-occupied, single-family homes damaged by Hurricane Harvey.

II. LOCAL BUYOUT AND ACQUISITION PROGRAM (LBAP)

Funding Available:

\$18,430,647

Program Administration:

Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to eligible entities per GLO and HUD requirements.

Eligible Activities:

Funds may be utilized to -

- Buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner’s out of harm’s way to a lower-risk area;
- Provide relocation Assistance with buyout or acquisition activities;
- Provide down-payment Assistance with buyout or acquisition activities;

- Conduct demolition activities;
- Conduct activities designed to relocated families outside of floodplains;
- Provide public service activities within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Provide matching funds for FEMA Hazard Mitigation Grant Programs (HMGP).

Ineligible Activities:

- Provide incentive payments to households that move to disaster-impacted floodplains.

III. LOCAL INFRASTRUCTURE PROGRAM (LIP)

Funding Available:

\$36,044,589

Program Administration:

Local units of government (cities and counties) will administer this program. GCRPC will develop a method of distribution to allocate funds to all cities and counties per GLO and HUD requirements.

Eligible Activities:

Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within a 15% cap).

Ineligible Activities:

- CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Rehabilitation Program (Rehabilitation Assistance for Non- Federal Flood Control Projects);
 - Ensure the structure is accredited under the FEMA National Flood Insurance Program;
 - Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- Funds may not be used to assist a privately-owned utility for any purpose;

- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
- By law, (codified in the HUD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is \$250,000 or less.

IV. DRAFT METHOD(S) OF DISTRIBUTION:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, FEMA Public Assistance data, social vulnerability data, a resiliency factor, and impact calculations to distribute available funding to eligible entities.

V. PUBLIC COMMENT(S) AND RESPONSE(S):

1. PUBLIC COMMENT(S) RECEIVED FROM JUNE 6TH THROUGH JUNE 18TH, 2018:

No public comments received.

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- **BRUCE SPITZENGEL**, President, GrantWorks
 - A. Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?**

Response:

Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

B. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

Response:

Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

C. CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.

[No oral response provided. Comment recorded.]

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria

A. When can public comments be submitted?

Response:

At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

B. Is there a required format for public comments?

Response:

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June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1908 N. Laurent Street
Victoria, TX 77901

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Dear Mr. Ada,

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Thank you for the opportunity to submit public comments and thank you for your ongoing efforts to assist local entities within the Golden Crescent Region with the implementation of post-Harvey disaster recovery programs.

Respectfully submitted,

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such data does not provide a solution to incorporate new data into the currently developed draft MOD formulas.

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The local buyout and acquisition program will remove homes from harm’s way. [sic]

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GCRPC has established the draft objective criteria for allocation of funds to the various eligible entities according to the GLO requirements stated above. Population data, FEMA Individual Assistance Data, Unmet Need calculations, Social Vulnerability data, and a resilience factor are the objective criteria utilized.

¹Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines at 6.

The current draft MOD distribute funds to all eligible entities for all eligible activities in order to provide eligible entities with maximum flexibility to administer their respective local programs. Conditions of funding for all eligible entities include the requirement that any entity use 70% of its allocation to benefit Low-to-Moderate Income households, as well as, the requirement that funding be utilized to address HUD and GLO priorities as stated in the Federal Register and State Action Plan.

C. The MOD should standardize the benefits provided in buyout programs

Response:

GCRPC is not a sub-recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds. Thus, this comment goes beyond the scope of GCRPC's current task(s). Per GLO guidance, eligible entities identified in the MOD are the planned subrecipients tasked with administration of funds for each program. Funding is conditioned on each eligible entity administering these programs in adherence to HUD & GLO priorities, requirements, and guidelines.

- **Brennan Griffin, Deputy Director**, Texas Appleseed, *received 7/9/2018 via email/ attachment.*

A. [A] description of methodology and attached allocation tables do not constitute a MOD according to the “Councils of Government Method of Distribution Guidance” issued by GLO. The required MOD Summary form is not included, so the draft does not document:

- **The Citizen Participation Plan and its implementation;**
- **An explanation of how the MOD fosters long term planning and recovery;**
- **An explanation of how unmet housing needs will be met; or,**
- **How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.**

Therefore, GCRPC has not published a MOD for public comment, and must publish a compliant document for 14 days of public comment according to its Citizen Participation Plan.

Response:

The GLO “required MOD Summary form” is a working document intended to summarize 1) the MOD public development process and 2) the final Draft MOD submitted for review and approval by the GLO. All form responses concisely reiterate the resulting methodology developed throughout the public planning process. GCRPC has published, and continuously updated, draft MOD materials for public review and comment since June 4, 2018. Compliance with GLO

Guidelines will be confirmed by the GLO after the submission of GCRPC MOD Materials on July 13, 2018.

- B. We recommend that GCRPC, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions, and that an accountability system is set up to make sure that local jurisdictions are abiding by the program guidelines.**

Response:

The GCRPC is a regional voluntary association of local governments and other agencies. HUD and GLO rules for Local Buyout and Acquisition Program funding require eligible entities directly receive and administer program funds. GCRPC stands ready to assist regional membership upon the request, direction, and approval of its Board of Directors and membership.

- C. We are also concerned that GCRPC has chosen to use the threshold allocation of \$1,000,000 as a cap on local buyout programs.**

Response:

HUD and GLO rules require a minimum (floor) \$1,000,000 allocation to eligible entities to ensure the viability and efficacy of local buyout and acquisition programs.

- D. Infrastructure programs must prioritize the needs of low- and middle-income households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. A key issue for many of these communities is environmental justice, as they were impacted not only by flooding but also by hazards related to chemicals, oils, sewage, waste or air pollution during the event... We appreciate GCRPC's effort to take this social vulnerability into account. Our concern is that local jurisdictions won't follow through with these guidelines, and so we suggest that an accountability program is set in place to ensure all jurisdictions are abiding by these norms.**

Response:

Eligible entities who receive and utilize CDBG-DR funding are required to adhere to all HUD and GLO conditions of funding. Additionally, eligible entities must still submit project proposals for review and approval by the GLO and HUD prior to the expenditure of program funds.

- E. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for**

example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

Response:

GCRPC is not identified as an eligible direct recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds.

- F.** We strongly recommend that GCRPC use the methodology proposed by the Texas Low Income Housing Information Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household's FVL to their income, thereby considering the level of impact on a household, acknowledging the loss valuation variations produced by the FEMA/HUD methodology, and more accurately counts households with unmet housing needs that are the least able to recover and most vulnerable to housing insecurity.

Response:

This recommendation has been recorded and will be submitted to the GCRPC Board of Directors and GLO for consideration.

4. ORAL PUBLIC COMMENT(S) RECEIVED AND RESPONSES GIVEN DURING PUBLIC HEARING#2:

- **Dina Hardwick, Texas RioGrande Legal Aid**

- A.** How is Low to Moderate Income (LMI) status calculated?

Response:

70% of allocated funds must benefit 51% or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI). Census block groups that have a LMI population of 51 percent or more have been identified using HUD's 2017 Low- and Moderate-Income Summary Data.

- B.** Who decides if pre-storm or post-storm market value will be utilized in the Local Buyout and Acquisition program?

Response:

Each entity administering a Local Buyout and Acquisition program will determine which value to utilize.

- C. The GLO is currently conducting a Housing Needs Assessment with the assistance of the University of Texas at Austin; where and how will the resulting data from the assessment be utilized?**

Response:

For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Marett Hanes,**
 - A. What department from the University of Texas at Austin is conducting the Housing Needs Assessment?**

Response:

The University of Texas at Austin, IC² Institute, Bureau of Business Research. For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Stacy Kirkham, City of Seadrift Resident**
 - A. What happens if the GLO or HUD determines there are deficiencies or issues with the submitted GCRPC Method of Distribution?**

Response:

GLO will inform GCRPC of any deficiencies and provide guidance on how deficiencies may be addressed.

- B. How long will the HUD-GLO review take?**

Response:

The deadline for submission of MODs is Friday, July 13, 2018. GLO has estimated they may begin responding as early as the last week of July.

- C. When will funding be awarded to eligible entities/communities?**

Response:

Eligible entities will be required to submit project proposals to the GLO. Guidance regarding project proposal format will be provided by GLO. Awards will follow review and approval of an eligible entity's proposed projects.

NOTE: All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.

Outreach and Contacts



GOLDEN CRESCENT REGIONAL PLANNING COMMISSION

1908 N Laurent , Suite 600, Victoria, TX 77901

(361) 578-1587 / Fax (361) 578-8865

www.gcrpc.org

Golden Crescent Economic Development District

June 1, 2018

EXECUTIVE COMMITTEE

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Tramer Woytek
Judge, Lavaca County

1st Vice-President

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Municipal Judge, Edna

Immediate Past President

Wayne Dierlam
Citizen, Victoria

Executive Director

Joe E. Brannan

SOLICIATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for **\$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.**

Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

- GCRPC Conference Room located at 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC will provide for reasonable accommodations for persons attending the GCRPC public hearings. Public hearings will be conducted in English. Requests from persons needing special accommodations, requests for language interpreters, or requests for other special communication needs should be made at least 48 hours prior to each hearing.

For accommodation requests or additional information about this posting, please call (361) 578-1587.



GOLDEN CRESCENT REGIONAL PLANNING COMMISSION

1908 N Laurent , Suite 600, Victoria, TX 77901

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www.gcrpc.org

Golden Crescent Economic Development District

1 de Junio de 2018

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Joe E. Brannan

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) está buscando aportes del público sobre el método de distribución para **\$55,475,236** de **Huracán Harvey Community Development Block Grant Fondos de Recuperación de Desastres (CDBG-DR)**.

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

- **Lunes, 18 de Junio de 2018**, a 6:00 p.m.. en la Sala de Conferencias en Victoria Tower, situado en 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901
- **Lunes, 9 de Julio de 2018**, a 6:00 p.m. a 120 S. Main; 2nd Floor, en la Sala de Conferencias en Victoria Tower, situado en 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

El GCRPC recibirá comentarios adicionales por escrito desde el Lunes, 4 de junio de 2018, hasta el Viernes, 9 de Julio de 2018. Los comentarios escritos deben recibirse a más tardar a las 5:00 p.m., el Viernes, 9 de Julio de 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

Un proyecto de método de distribución se publicará a partir del Lunes, 4 de Junio de 2018, a 12:00 a.m., en el sitio web de Internet www.gcrpc.org y también estará disponible para su revisión en los siguientes lugares:

- GCRPC Sala de Conferencias, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten adaptaciones especiales, solicitudes de intérpretes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia.

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.

michaela@gcrpc.org

From: hannahc@gcrpc.org
Sent: Monday, June 11, 2018 2:06 PM
To: staff@newscenter25.com
Cc: michaela@gcrpc.org
Subject: PSA- Hurricane Harvey Funds

Follow Up Flag: Follow up
Flag Status: Flagged

Who: Golden Crescent Regional Planning Commission;
Why: Hurricane Harvey Recovery Funding (\$55,475,236) for Home Buyouts and Infrastructure
What: Public Comment Period and Public Hearing Schedule;
When:
Public Comment Period – Open until July 9th.
Monday, June 18, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
Monday, July 9, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
More info available at www.gcrpc.org

Let me know if you need anything else and thanks so much!

Hannah Crone

Program Specialist II
Golden Crescent Regional Planning Commission
(361) 578-1587 ext. 206

The contents of this email may contain confidential information that may be legally privileged and protected by federal and state law. This information is intended for use only by the entity or individual to whom it is addressed. The authorized recipient is obligated to maintain the information in a safe, secure, and confidential manner. The authorized recipient is prohibited from using this information for purposes other than intended, prohibited from disclosing this information to any other party unless required to do so by law or regulation, and is required to destroy the information after its stated need has been fulfilled. If you are in possession of this protected health information, and are not the intended recipient, you are hereby notified that any improper disclosure, copying, or distribution of the contents of this information is strictly prohibited. Please notify the owner of this information immediately and arrange for its return or destruction.

michaela@gcrpc.org

From: hannahc@gcrpc.org
Sent: Monday, June 11, 2018 10:16 AM
To: jennie.molina@townsquaremedia.com
Cc: michaela@gcrpc.org
Subject: PSA - Hurricane Harvey Funds

Follow Up Flag: Follow up
Flag Status: Flagged

Who: Golden Crescent Regional Planning Commission;
Why: Hurricane Harvey Recovery Funding (\$55,475,236) for Home Buyouts and Infrastructure
What: Public Comment Period and Public Hearing Schedule;
When:
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Monday, June 18, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
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More info available at www.gcrpc.org

Let me know if you need anything else and thanks so much!

Hannah Crone

Program Specialist II
Golden Crescent Regional Planning Commission
(361) 578-1587 ext. 206

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From: [Susan Cerf](#)
To: [Jonah Chen](#); [Rose Walker](#); [Mary Elen Williams](#); [Madison Powell](#); [John Blount](#); [Ty Petty](#)
Cc: [Ellen Kinsey](#); [Shawn Strange](#); [Robert Grimm](#); [Shelby O'Brien](#); [Chelsea Buchholtz](#); [Alexandra Gamble](#); [Shawn Strange](#); [Maureen Mahoney](#)
Subject: RE: COG Public Meeting Dates -- please send
Date: Tuesday, June 5, 2018 1:34:06 PM
Attachments: [image001.png](#)
[image002.png](#)
[052018_GCRPC_GLO_HUD_MOD_Citizen_Participation_Plan.pdf](#)
[05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf](#)
[05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH.pdf](#)

Good afternoon all:

I have attached the MOD and Citizen Participation Ads. There was some confusion regarding dates and Michael has supplied me with the corrected dates for Golden Crescent Regional Planning Commission:

Public Notice will run from June 3- July 9, 2018

- **Monday, June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- **Monday, July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Hope this clears up any confusion. It is also in the GCRPC website at www.GCRPC.org



Susan L. Cerf
Grant Coordinator III | Community Oversight
Community Development & Revitalization
Texas General Land Office
GEORGE P. BUSH, Commissioner

From: Jonah Chen
Sent: Thursday, May 31, 2018 8:47 AM
To: Susan Cerf <Susan.Cerf@glo.texas.gov>; Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>; Alexandra Gamble <Alexandra.Gamble@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>
Subject: RE: COG Public Meeting Dates -- please send

H-GAC Newsletter Announcement Link:

<http://www.h-gac.com/news/articles/2018-05-30.aspx>

Dates for MOD Meetings:

- Public Planning Meeting Monday, June 4, 2018 – 10 a.m. to noon- Wharton Civic Center, 1924 N. Fulton Street, Wharton
- Public Planning Meeting Tuesday, June 5, 2018 – 6 p.m. to 8 p.m. – Helen Hall Library Meeting Room,

100 W. Walker Street, League City

- Public Planning Meeting Wednesday, June 6, 2018 – 10 a.m. to noon – Houston-Galveston Area Council, Conference Room A, Second Floor, 3555 Timmons Lane, Houston
- Public Planning Meeting Thursday, June 7, 2018 – 5 p.m. to 7 p.m. – Liberty County Community Center, 318 San Jacinto, Liberty
- Public Hearing Thursday, June 28, 2018 – 5 p.m. to 7 p.m. - Courtyard Marriott at Katy Mills, 25402 Kathy Mills Parkway, Katy
- Public Hearing Friday, June 29, 2018 – 10 a.m. to noon – Hilton Homewood Suites, 3000 Interstate 45 North, Conroe



Jonah Chen
Community Outreach Coordinator | IGR
Community Development & Revitalization
Texas General Land Office
GEORGE P.
BUSH,
Commissioner

From: Susan Cerf

Sent: Thursday, May 31, 2018 8:40 AM

To: Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>

Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>; Alexandra Gamble <Alexandra.Gamble@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>

Subject: RE: COG Public Meeting Dates -- please send

Here is Golden Crescents link

<http://www.gcrpc.org>



Susan L. Cerf
Grant Coordinator III | Community Oversight
Community Development & Revitalization
Texas General Land Office
GEORGE P. BUSH, Commissioner

From: Rose Walker

Sent: Thursday, May 31, 2018 8:32 AM

To: Susan Cerf <Susan.Cerf@glo.texas.gov>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>

Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>; Alexandra Gamble <Alexandra.Gamble@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>

Subject: RE: COG Public Meeting Dates -- please send

All,

This link is brand new.

<http://www.glo.texas.gov/recovery/partnerships/regional-partners/index.html>

We will be utilizing the Regional Partners section of the GLO – Recovery website to provide updates on regional meetings.

Best practices wise – I prefer to have the links for the COG’s website to serve as the “source” of information. Otherwise – we would need to develop a procedure to make sure that if dates are changed locally – who within GLO is to be notified, and how quickly is the expected turnaround to provide the updated information on the GLO website.

Worst case scenario – a meeting is moved – we have incorrect information on our website – and people show up to the wrong location.

I’m open to suggestions.

Thanks,

Rose

From: Susan Cerf

Sent: Thursday, May 31, 2018 8:23 AM

To: Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>

Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>

Subject: RE: COG Public Meeting Dates -- please send

I attended last night’s Executive Board meeting for GCRPC. They have approved the MOD and Publishing dates for the Citizens Participation meetings. Michael Ada will be notifying sometime today (I believe) Just a quick FYI for me, “... All, the COGs will conduct public meetings and comment periods regarding their MODs (funding allocations) and how they will be spent in their regions. They are required to adhere to meeting requirements and public comment periods. ***We have the first list of public meetings from H-GAC. I have drafted content for the newsletter...***”

What do I need to do to ensure Rose is aware of the Dates etc... I would like to make sure everything is taken care of on my end so we have nothing left hanging.

Thanks for your help



Susan L. Cerf
Grant Coordinator III | Community Oversight
Community Development & Revitalization
Texas General Land Office
GEORGE P. BUSH, Commissioner

From: Mary Elen Williams
Sent: Wednesday, May 30, 2018 10:49 PM
To: Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Susan Cerf <Susan.Cerf@glo.texas.gov>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>
Subject: COG Public Meeting Dates -- please send

Thank you, Rose.

Jonah – FYI for HGAC public meetings. I think you know about most of these, but please attend what you can.

Rose/Shawn/Ellen -- Do we know about the other COG public meeting dates/location? Would be helpful to know other dates for outreach coordinators and to share on SM.

I saw on Twitter that DETCOG was tonight. Would have been good to publicize.

Thank you,

Mary Elen

From: Rose Walker
Sent: Tuesday, May 22, 2018 4:42 PM
To: Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>
Subject: Newsletter Content - COG MODs

All, the COGs will conduct public meetings and comment periods regarding their MODs (funding allocations) and how they will be spent in their regions. They are required to adhere to meeting requirements and public comment periods. We have the first list of public meetings from H-GAC. I have drafted content for the newsletter.

Also, there may be more items to highlight prior to the release of the newsletter – we anticipate the release of the 2016 competitive application period. We will keep you posted with updates.

Newsletter Content Week of 5/21/18

The Houston-Galveston Area Council will be holding public meetings to seek input regarding the proposed Method of Distribution (MOD) to counties and local jurisdictions for buyout/acquisition and infrastructure projects associated with Hurricane Harvey. Harris County and the City of Houston are not included in this allocation and will receive funding directly from the General Land Office.

The public meetings will be held on the following dates:

June 4 - Wharton

June 5 – League City

June 6- H-GAC in Houston

June 28 – Katy

June 29 - Conroe

To learn more please visit:

<http://www.h-gac.com/harvey/cdbg-disaster-funds/default.aspx>

Thanks,

Rose

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for **\$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.**

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- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

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GCRPC will provide for reasonable accommodations for persons attending the GCRPC public hearings. Public hearings will be conducted in English. Requests from persons needing special accommodations, requests for language interpreters, or requests for other special communication needs should be made at least 48 hours prior to each hearing.

For accommodation requests or additional information about this posting, please call (361) 578-1587.

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para **\$55,475,236 de Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.**

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

- Lunes, el día **18 de junio del año 2018**, a la hora 9:00 a.m. en la Sala de Conferencias en Victoria Tower, situado por la calle 1908 N. Laurent, en el segundo piso, Victoria, Texas, 77901
- Lunes, **el día 19 de julio del año 2018**, a la hora 9:00 a.m. por la calle 120 S. Main; segundo piso, en la Sala de Conferencias de Sam Houston, Victoria, Texas, 77901.

El GCRPC recibirá comentarios adicionales por escrito desde el lunes, el día 4 de junio del año 2018, hasta el viernes, el día 9 de junio del año 2018. Los comentarios escritos deben recibirse a más tardar a la hora 5:00 p.m., el viernes, el día 9 de junio del año 2018, Atención: Michael Ada, director de desarrollo económico, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora 12:00 a.m., en el sitio Web del Internet www.gcrpc.org y también estará disponible para su revisión en los siguientes lugares:

- GCRPC, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten adaptaciones especiales, solicitudes de intérpretes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia.

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.

michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Thursday, June 14, 2018 10:40 AM
To: 'lisac@gcrpc.org'
Cc: 'hannahc@gcrpc.org'; 'Susan Cerf'
Subject: Public Notices for Buses
Attachments: 06142018_GCRPC_MOD_RegTran_PublicNotice.pdf

Tracking:	Recipient	Read
	'lisac@gcrpc.org'	
	'hannahc@gcrpc.org'	
	'Susan Cerf'	
	Lisa Cortinas	Read: 6/14/2018 11:07 AM
	hannahc@gcrpc.org	Read: 6/14/2018 11:00 AM

Lisa,

Here's a PDF of the Public Notice we would like to post in the buses as discussed.

Let me know if I need to make any adjustments to the format.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

Confidentiality Note

This email may contain information that is confidential or privileged and exempt from disclosure under applicable law. The information is intended to be solely for the use of the recipient(s) named in the email. If you are not an intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.

From: michaela@gcrpc.org
Sent: Tuesday, August 21, 2018 2:21 PM
Cc: 'hannahc@gcrpc.org'; Susan Cerf; 'Alexandra Gamble'; 'Shawn Strange'; 'Christopher Smith'; 'Zachary Stern'
Subject: NEW - Additional Public Comment Period - HUD CDBG-DR - Regional Methods of Distribution
Attachments: GCRPC_MOD_PublicCommentForm.pdf; MOD Final Public Comment Docs.zip

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
Susan Cerf	Read: 8/21/2018 3:17 PM
'Alexandra Gamble'	
'Shawn Strange'	
'Christopher Smith'	
'Zachary Stern'	
SHAWNA CURRIE	
Alejandro Camacho	Read: 8/22/2018 11:11 AM
Commissioner Alonzo Morales	
david.hall@calhouncotx.org	
Dolly Stokes	Read: 8/21/2018 4:00 PM
Dr. John McNeile	
John Kaminski, Asst. City Manager	
Joyce Dean	
Judge P.T. (Pat) Calhoun	
LaDonna Thigpen	
Larry Garrett, DVM	
Rebecca Murry	
Sarah V. Quick	
hannahc@gcrpc.org	Read: 8/21/2018 2:24 PM
David Hall	Read: 8/21/2018 2:57 PM

Regional Recovery & Resilience Guidance Group Members,

GCRPC has completed various updates and revisions to the Local Buyout & Acquisition Program and Local Infrastructure Program funding Methods of Distribution (MOD) as requested by the Texas General Land Office. Final versions of all revised MOD documentation can be found in the attached .zip file.

Additional MOD documentation can be found on our website homepage at www.gcrpc.org.

An additional public comment period is being provided beginning August 22, 2018. Public comments will be received in writing until close of business (5:00 pm), September 6, 2018. All public comments must be submitted with the completed Public Comment Form. See attached.

Please feel free to contact myself or Hannah Crone (hannahc@gcrpc.org) with any questions or concerns.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Tuesday, August 21, 2018 3:00 PM
Cc: 'hannahc@gcrpc.org'; Susan Cerf; 'Alexandra Gamble'; 'Shawn Strange'; 'Christopher Smith'; 'Zachary Stern'
Subject: NEW - Additional Public Comment Period - HUD CDBG-DR - Regional Methods of Distribution
Attachments: GCRPC_MOD_PublicCommentForm.pdf; MOD Final Public Comment Docs.zip

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
Susan Cerf	Read: 8/21/2018 3:18 PM
'Alexandra Gamble'	
'Shawn Strange'	
'Christopher Smith'	
'Zachary Stern'	
'carolvillarreal@hsc.state.tx.us'	
'hector.amaya@hsc.state.tx.us'	
'dalia.villa@bbtrails.org'	
'jtunnell@gulfbend.org'	
'lgrohman@devereux.com'	
'gschmidt@tisd.net'	
'srpohl@sbcglobal.net'	
'yhatx@sbcglobal.net'	
'goliadha@gmail.com'	
'jeangreen99@hotmail.com'	
'ehac@att.net'	
hannahc@gcrpc.org	Read: 8/21/2018 3:28 PM

Dear Housing and Public Health Sector Leadership:

GCRPC has completed various updates and revisions to the Local Buyout & Acquisition Program and Local Infrastructure Program funding Methods of Distribution (MOD) as requested by the Texas General Land Office. Final versions of all revised MOD documentation can be found in the attached .zip file.

Additional MOD documentation can be found on our website homepage at www.gcrpc.org.

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Please feel free to contact myself or Hannah Crone (hannahc@gcrpc.org) with any questions or concerns.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Tuesday, August 21, 2018 2:56 PM
Cc: 'hannahc@gcrpc.org'; Susan Cerf; 'Alexandra Gamble'; 'Shawn Strange'; 'Christopher Smith'; 'Zachary Stern'
Subject: NEW - Additional Public Comment Period - HUD CDBG-DR - Regional Methods of Distribution
Attachments: GCRPC_MOD_PublicCommentForm.pdf; MOD Final Public Comment Docs.zip

Tracking:

Recipient	Delivery
'hannahc@gcrpc.org'	Failed: 8/21/2018 4:04 PM
Susan Cerf	Failed: 8/21/2018 4:04 PM
'Alexandra Gamble'	Failed: 8/21/2018 4:04 PM
'Shawn Strange'	Failed: 8/21/2018 4:04 PM
'Christopher Smith'	Failed: 8/21/2018 4:04 PM
'Zachary Stern'	Failed: 8/21/2018 4:04 PM
Charlotte Baker	Failed: 8/21/2018 4:04 PM
'mike.pfeifer@calhouncotx.org'	Failed: 8/21/2018 4:04 PM
'lois.kolkhorst@senate.texas.gov'	Failed: 8/21/2018 4:04 PM
'geanie.morrison@house.texas.gov'	Failed: 8/21/2018 4:04 PM
'pcmayor2016@yahoo.com'	Failed: 8/21/2018 4:04 PM
'jwhitlow@portlavaca.org'	Failed: 8/21/2018 4:04 PM
'Daryl.fowler@co.dewitt.tx.us'	Failed: 8/21/2018 4:04 PM
'mayor@cityofcuero.com'	Failed: 8/21/2018 4:04 PM
'mayor@cityofhallettsville.org'	Failed: 8/21/2018 4:04 PM
'citymanager@cityofyoakum.org'	Failed: 8/21/2018 4:04 PM
'office@yorktowntx.com'	Failed: 8/21/2018 4:04 PM
Judge P.T. (Pat) Calhoun	Failed: 8/21/2018 4:04 PM
'citysec@cityofmoulton.com'	Failed: 8/21/2018 4:04 PM
'citysecretary@cityofgonzales.org'	Failed: 8/21/2018 4:04 PM
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'countyjudge089@co.gonzales.tx.us'	Failed: 8/21/2018 4:04 PM
'ckacir@cityofgonzales.org'	Failed: 8/21/2018 4:04 PM
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'd.simons@co.jackson.tx.us'	Failed: 8/21/2018 4:04 PM
'ddoering@cityofedna.com'	Failed: 8/21/2018 4:04 PM
'cityofedna@cityofedna.com'	Failed: 8/21/2018 4:04 PM
'cityofnordheim@att.net'	Failed: 8/21/2018 4:04 PM
'danap@lavacacounty.net'	Failed: 8/21/2018 4:04 PM
'zim1958@att.net'	Failed: 8/21/2018 4:04 PM
'ppolasek@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'citymanager@victoriatx.org'	Failed: 8/21/2018 4:04 PM
John Kaminski, Asst. City Manager	Failed: 8/21/2018 4:04 PM

Recipient**Delivery**

'judgetw@lavacacounty.net'	Failed: 8/21/2018 4:04 PM
'ktlafleur@yahoo.com'	Failed: 8/21/2018 4:04 PM
'jsoliz@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'amorales@goliadcountytexas.gov'	Failed: 8/21/2018 4:04 PM
'annier@jacobs-webber.com'	Failed: 8/21/2018 4:04 PM
'monmac@tisd.net'	Failed: 8/21/2018 4:04 PM
'Efs1@att.net'	Failed: 8/21/2018 4:04 PM
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'comishjeb@ykc.com'	Failed: 8/21/2018 4:04 PM
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'seadrift@tisd.net'	Failed: 8/21/2018 4:04 PM
'comm@lavacacounty.net'	Failed: 8/21/2018 4:04 PM
'adaniels@gbra.org'	Failed: 8/21/2018 4:04 PM
'cpap@papacek.net'	Failed: 8/21/2018 4:04 PM
'richard.randle@co.dewitt.tx.us'	Failed: 8/21/2018 4:04 PM
'ajsummers3196@att.net'	Failed: 8/21/2018 4:04 PM
'chuck.benavides@goliadtx.net'	Failed: 8/21/2018 4:04 PM
'Daryl.fowler@co.dewitt.tx.us'	
'pcalhoun@goliadcountytexas.gov'	
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'mayor@cityofcuero.com'	
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'Ganado@cityofganado.com'	Failed: 8/21/2018 4:04 PM
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'jcozza@cityofhallettsville.org'	Failed: 8/21/2018 4:04 PM
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'fredhilscher@sbcglobal.net'	Failed: 8/21/2018 4:04 PM
'smileytx@gvec.net'	
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'cwaelder@gvtc.com'	Failed: 8/21/2018 4:04 PM
'annier@jacobs-weber.com'	Failed: 8/21/2018 4:04 PM
'yorktownmayor@sbcglobal.net'	Failed: 8/21/2018 4:04 PM

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'rzella@cityofcuero.com'	Failed: 8/21/2018 4:04 PM
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'ktlafleur@yahoo.com'	

Recipient**Delivery**

'cboatright@co.gonzales.tx.us'	Failed: 8/21/2018 4:04 PM
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'muncriefdistrict1@cityofedna.com'	Failed: 8/21/2018 4:04 PM
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'ljrodriguez9245@gmail.com'	Failed: 8/21/2018 4:04 PM
'goliadcc_mburns@sbcglobal.net'	Failed: 8/21/2018 4:04 PM
'ralanizcitycouncil@goliadtx.net'	Failed: 8/21/2018 4:04 PM
'charles.benavides@goliadtx.net'	Failed: 8/21/2018 4:04 PM
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'mayor@cityofhallettsville.org'	
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'jcozza@cityofhallettsville.org'	
'Koch_rn@yahoo.com'	Failed: 8/21/2018 4:04 PM
'erv-mary@sbcglobal.net'	

Recipient	Delivery
'zim1958@att.net'	
'darrylhelfer78@gmail.com'	Failed: 8/21/2018 4:04 PM
'mike_cbrrr@hotmail.com'	Failed: 8/21/2018 4:04 PM
'wagner_donald@att.net'	Failed: 8/21/2018 4:04 PM
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'pcmayer2016@yahoo.com'	
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'tdent@portlavaca.org'	Failed: 8/21/2018 4:04 PM
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'rpadron@portlavaca.org'	Failed: 8/21/2018 4:04 PM
'jward@portlavaca.org'	Failed: 8/21/2018 4:04 PM
'kbarr@portlavaca.org'	Failed: 8/21/2018 4:04 PM
'resse1108@yahoo.com'	Failed: 8/21/2018 4:04 PM
'councilman.boehm@shinertexas.gov'	Failed: 8/21/2018 4:04 PM
'councilman.herman@shinertexas.gov'	Failed: 8/21/2018 4:04 PM
'councilman.bates@shinertexas.gov'	Failed: 8/21/2018 4:04 PM
'councilman.murrile@shinertexas.gov'	Failed: 8/21/2018 4:04 PM
'councilman.schroeder@shinertexas.gov'	Failed: 8/21/2018 4:04 PM
'jsoliz@victoriatx.org'	
'thalepaska@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'rdelagarza@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'jbauknight@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'ayoung@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'janscott@victoriatx.org'	Failed: 8/21/2018 4:04 PM
'cwaelder@gctx.com'	Failed: 8/21/2018 4:04 PM
'info@cityofwaelder.org'	Failed: 8/21/2018 4:04 PM
'annier@jacobs-weber.com'	
'tbowe@cityofyoakum.org'	
'yorktownmayor@sbcglobal.net'	

Dear Elected Officials and Community Leaders:

GCRPC has completed various updates and revisions to the Local Buyout & Acquisition Program and Local Infrastructure Program funding Methods of Distribution (MOD) as requested by the Texas General Land Office. Final versions of all revised MOD documentation can be found in the attached .zip file.

Additional MOD documentation can be found on our website homepage at www.gcrpc.org.

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Please feel free to contact myself or Hannah Crone (hannahc@gcrpc.org) with any questions or concerns.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Wednesday, August 22, 2018 8:52 AM
To: 'hannahc@gcrpc.org'; Susan Cerf; 'Alexandra Gamble'; 'Shawn Strange'; 'Christopher Smith'; 'Zachary Stern'
Subject: NEW - Additional Public Comment Period - HUD CDBG-DR - Regional Methods of Distribution
Attachments: GCRPC_MOD_PublicCommentForm.pdf

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
Susan Cerf	Read: 8/22/2018 8:54 AM
'Alexandra Gamble'	
'Shawn Strange'	
'Christopher Smith'	
'Zachary Stern'	
'Charlotte Baker'	
'mike.pfeifer@calhouncotx.org'	
'lois.kolkhorst@senate.texas.gov'	
'geanie.morrison@house.texas.gov'	
'pcmayer2016@yahoo.com'	
'jwhitlow@portlavaca.org'	
'Daryl.fowler@co.dewitt.tx.us'	
'mayor@cityofcuero.com'	
'mayor@cityofhallettsville.org'	
'citymanager@cityofyoakum.org'	
'office@yorktowntx.com'	
'Judge P.T. (Pat) Calhoun'	
'citysec@cityofmoulton.com'	
'citysecretary@cityofgonzales.org'	
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'ckacir@cityofgonzales.org'	
'smileytx@gvec.net'	
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'ddoering@cityofedna.com'	
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'cityofnordheim@att.net'	
'danap@lavacacounty.net'	
'zim1958@att.net'	
'ppolasek@victoriatx.org'	
'citymanager@victoriatx.org'	
'John Kaminski, Asst. City Manager'	

Recipient**Read**

'judgetw@lavacacounty.net'
'ktlafleur@yahoo.com'
'jsoliz@victoriatx.org'
'amorales@goliadcountytexas.gov'
'monmac@tisd.net'
'Efs1@att.net'
'perezrb40@yahoo.com'
'comishjeb@ykc.com'
'countyjudge089@co.gonzales.tx.us'
'gburns@vctx.org'
'wedierlam@gmail.com'
'seadrift@tisd.net'
'comm@lavacacounty.net'
'adaniels@gbra.org'
'cpap@papacek.net'
'richard.randle@co.dewitt.tx.us'
'ajsummers3196@att.net'
'chuck.benavides@goliadtx.net'
'Daryl.fowler@co.dewitt.tx.us'
'pcalhoun@goliadcountytexas.gov'
'd.simons@co.jackson.tx.us'
'bzeller@vctx.org'
'mayor@cityofcuero.com'
'cityofedna@cityofedna.com'
'Ganado@cityofganado.com'
'citysecretary@cityofgonzales.org'
'jcozza@cityofhallettsville.org'
'Koch_m@yahoo.com'
'erv-mary@sbcglobal.net'
'nixoncityclerk@gvec.net'
'cityofnordheim@att.net'
'pcmayer2016@yahoo.com'
'indianolatrader@yahoo.com'
'fredhilscher@sbcglobal.net'
'smileytx@gvec.net'
'ppolasek@victoriatx.org'
'cwaelder@gvtc.com'
'annier@jacobs-weber.com'
'yorktownmayor@sbcglobal.net'
'bturner@portlavaca.org'

Recipient**Read**

'pcomfort@tisd.net'
 'rzella@cityofcuero.com'
 'jbarth@yorktowntx.gov'
 'citymanager@cityofgonzales.org'
 'mdzepeda@hotmail.com'
 'ddoering@cityofedna.com'
 'Ganado@ykc.com'
 'citymanager@cityofyoakum.org'
 'tbowe@cityofyoakum.org'
 'city_of_shiner@sbcglobal.net'
 'citysec@cityofmoulton.com'
 'cgarrett@victoriatx.org'
 'trudia.preston@goliadtx.net'
 'citysecretary@goliadtx.net'
 'mike.pfeifer@calhouncotx.org'
 'mayor@cityofhallettsville.org'
 'pkennedy@cityofcuero.com'
 'cueroed@cityofcuero.com'
 'glawing@gcec.org'
 'humphreysj@uhv.edu'
 'adriancannady@victoriaedc.com'
 'vedc@victoriaedc.com'
 'bmiska@cityofedna.com'
 'pkaup@portofvictoria.com'
 'info@wscnd.com'
 'annier@jacobs-weber.com'
 Annie Rodriguez
 hannahc@gcrpc.org

Read: 8/22/2018 8:57 AM
 Read: 8/22/2018 9:14 AM

Dear Elected Officials and Community Leaders:

GCRPC has completed various updates and revisions to the Local Buyout & Acquisition Program and Local Infrastructure Program funding Methods of Distribution (MOD), as requested by the Texas General Land Office.

Our office attempted email delivery of final versions of all revised MOD documentation (in PDF and .zip file format) at 2:56 PM and 4:21 PM yesterday. We received rejection messages from the all email addresses in our “Elected Officials and Community Leaders” distribution list. This is likely due to either the inclusion of a .zip file or the size of the distribution list.

In the alternative, the Final MOD documentation will be available to review through our website homepage at www.gcrpc.org by noon today August 22, 2018.

Additionally, we can also share digital copies of all final MOD documentation through other means (i.e. DropBox, separate emails, or other file sharing applications) upon request.

An additional public comment period is being provided beginning August 22, 2018. Public comments will be received in writing until close of business (5:00 pm), September 6, 2018. The public comment period may be adjusted to ensure the 14-day requirement is met.

All public comments must be submitted with the completed Public Comment Form. See attached.

Thank you for your patience and please feel free to contact myself or Hannah Crone (hannahc@gcrpc.org) with any questions or concerns.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

Confidentiality Note

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Friday, July 13, 2018 1:34 PM
To: 'hannahc@gcrpc.org'; 'melodyl@gcrpc.org'
Cc: 'Susan Cerf'
Subject: UPDATE: HUD-GLO, Hurricane Harvey Regional CDBG-DR Funds Regional Methods of Distribution
Attachments: 07132018_GCRPC_MOD_CommentResponseSummary.pdf; 07132018_GCRPC_MODNarrative_Submission.pdf; 07132018_GCRPC_MODSummary_Signed.pdf

Dear Housing and Public Health Sector Leadership,

As you know, GCRPC was tasked with the development of Methods of Distribution (MODs) for funding to support two Hurricane Harvey CDBG-DR programs: 1) the Local Buyout & Acquisition Program and 2) the Local Infrastructure Program. After a public planning, review, and comment process beginning in early June; and two public planning hearings, final drafts of the GCRPC MODs are ready for submission to the Texas General Land Office (GLO). These final drafts are attached for your review.

This documentation is being submitted to the GLO as a final draft pending GCRPC Board of Directors approval on July 25, 2018. GCRPC Board Meeting details are available on the GCRPC Homepage at www.gcrpc.org.

Feel free to further distribute or post these materials as you see fit. Additionally, please continue to submit any questions or comments while the MOD is being reviewed for approval by the GCRPC Board of Directors and reviewed for final approval by the GLO.

Thank you for your consideration.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Friday, July 13, 2018 1:24 PM
To: 'hannahc@gcrpc.org'; 'melodyl@gcrpc.org'
Cc: 'Joe Brannan'; 'Susan Cerf'
Subject: UPDATE: HUD-GLO, Hurricane Harvey Regional CDBG-DR Funds Regional Methods of Distribution
Attachments: 07132018_GCRPC_MODSummary_Signed.pdf; 07132018_GCRPC_MOD_CommentResponseSummary.pdf; 07132018_GCRPC_MODNarrative_Submission.pdf

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
'melodyl@gcrpc.org'	
'Joe Brannan'	
'Susan Cerf'	
Charlotte Baker	
'mike.pfeifer@calhouncotx.org'	
'lois.kolkhorst@senate.texas.gov'	
'geanie.morrison@house.texas.gov'	
'pcmayor2016@yahoo.com'	
'jwhitlow@portlavaca.org'	
'Daryl.fowler@co.dewitt.tx.us'	
'mayor@cityofcuero.com'	
'mayor@cityofhallettsville.org'	
'citymanager@cityofyoakum.org'	
'office@yorktowntx.com'	
Judge P.T. (Pat) Calhoun	
'citysec@cityofmoulton.com'	
'citysecretary@cityofgonzales.org'	
'citysecretary@goliadtx.net'	
'countyjudge089@co.gonzales.tx.us'	
'ckacir@cityofgonzales.org'	
'smileytx@gvec.net'	
'd.simons@co.jackson.tx.us'	
'ddoering@cityofedna.com'	
'cityofedna@cityofedna.com'	
'cityofnordheim@att.net'	
'danap@lavacacounty.net'	
'zim1958@att.net'	
'ppolasek@victoriatx.org'	
'citymanager@victoriatx.org'	
John Kaminski, Asst. City Manager	

Recipient**Read**

'judgetw@lavacacounty.net'
'ktlafleur@yahoo.com'
'jsoliz@victoriatx.org'
'amorales@goliadcountytexas.gov'
'annier@jacobs-webber.com'
'monmac@tisd.net'
'Efs1@att.net'
'perezrb40@yahoo.com'
'comishjeb@ykc.com'
'countyjudge089@co.gonzales.tx.us'
'gburns@vctx.org'
'wedierlam@gmail.com'
'seadrift@tisd.net'
'comm@lavacacounty.net'
'adaniels@gbra.org'
'cpap@papacek.net'
'richard.randle@co.dewitt.tx.us'
'ajsummers3196@att.net'
'chuck.benavides@goliadtx.net'
'Daryl.fowler@co.dewitt.tx.us'
'pcalhoun@goliadcountytexas.gov'
'd.simons@co.jackson.tx.us'
'bzeller@vctx.org'
'mayor@cityofcuero.com'
'cityofedna@cityofedna.com'
'Ganado@cityofganado.com'
'citysecretary@cityofgonzales.org'
'jcozza@cityofhallettsville.org'
'Koch_m@yahoo.com'
'erv-mary@sbcglobal.net'
'nixoncityclerk@gvec.net'
'cityofnordheim@att.net'
'pcmayor2016@yahoo.com'
'indianolatrader@yahoo.com'
'fredhilscher@sbcglobal.net'
'smileytx@gvec.net'
'ppolasek@victoriatx.org'
'cwaelder@gvtc.com'
'annier@jacobs-weber.com'
'yorktownmayor@sbcglobal.net'

Recipient**Read**

'bturner@portlavaca.org'
 'pcomfort@tisd.net'
 'rzella@cityofcuero.com'
 'jbarth@yorktowntx.gov'
 'citymanager@cityofgonzales.org'
 'mdzepeda@hotmail.com'
 'ddoering@cityofedna.com'
 'Ganado@ykc.com'
 'citymanager@cityofyoakum.org'
 'tbowe@cityofyoakum.org'
 'city_of_shiner@sbcglobal.net'
 'citysec@cityofmoulton.com'
 'cgarrett@victoriatx.org'
 'trudia.preston@goliadtx.net'
 'citysecretary@goliadtx.net'
 'mike.pfeifer@calhouncotx.org'
 'mayor@cityofhallettsville.org'
 'pkennedy@cityofcuero.com'
 'cueroed@cityofcuero.com'
 'glawing@gcec.org'
 'humphreysj@uhv.edu'
 'adriancannady@victoriaedc.com'
 'vedc@victoriaedc.com'
 'bmiska@cityofedna.com'
 'pkaup@portofvictoria.com'
 'info@wscnd.com'
 Geanie Morrison
 sharonbarnard@victoriaedc.com
 Rhonda

Read: 7/13/2018 1:33 PM
 Read: 7/13/2018 1:41 PM
 Read: 7/13/2018 3:43 PM

Dear Elected Officials and Community Leaders,

As you know, GCRPC was tasked with the development of Methods of Distribution (MODs) for funding to support two Hurricane Harvey CDBG-DR programs: 1) the Local Buyout & Acquisition Program and 2) the Local Infrastructure Program. After a public planning, review, and comment process beginning in early June; and two public planning hearings, final drafts of the GCRPC MODs are ready for submission to the Texas General Land Office (GLO). These final drafts are attached for your review.

This documentation is being submitted to the GLO as a final draft pending GCRPC Board of Directors approval on July 25, 2018. GCRPC Board Meeting details are available on the GCRPC Homepage at www.gcrpc.org.

Feel free to further distribute or post these materials as you see fit. Additionally, please continue to submit any questions or comments while the MOD is being reviewed for approval by the GCRPC Board of Directors and reviewed for final approval by the GLO.

Thank you for your consideration.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

Confidentiality Note

This email may contain information that is confidential or privileged and exempt from disclosure under applicable law. The information is intended to be solely for the use of the recipient(s) named in the email. If you are not an intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.

michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Friday, July 13, 2018 1:10 PM
To: Alejandro Camacho; Commissioner Alonzo Morales; david.hall@calhouncotx.org; Dolly Stokes; Dr. John McNeile; John Kaminski, Asst. City Manager; Joyce Dean; Judge P.T. (Pat) Calhoun; LaDonna Thigpen; Larry Garrett, DVM; Rebecca Murry; Sarah V. Quick
Cc: 'hannahc@gcrpc.org'; 'melodyl@gcrpc.org'; 'Susan Cerf'
Subject: UPDATE: HUD-GLO, Hurricane Harvey Regional CDBG-DR Funds - Regional Method of Distribution
Attachments: 07132018_GCRPC_MOD_CommentResponseSummary.pdf; 07132018_GCRPC_MODNarrative_Submission.pdf; 07132018_GCRPC_MODSummary_Signed.pdf

Tracking:	Recipient	Read
	'hannahc@gcrpc.org'	
	'melodyl@gcrpc.org'	
	'Susan Cerf'	
	Alejandro Camacho	
	Commissioner Alonzo Morales	
	david.hall@calhouncotx.org	
	Dolly Stokes	
	Dr. John McNeile	
	John Kaminski, Asst. City Manager	
	Joyce Dean	
	Judge P.T. (Pat) Calhoun	
	LaDonna Thigpen	
	Larry Garrett, DVM	
	Rebecca Murry	
	Sarah V. Quick	
	Susan Cerf	Read: 7/13/2018 1:18 PM

Regional Recovery & Resilience Guidance Group Members,

As you know, GCRPC was tasked with the development of Methods of Distribution (MODs) for funding to support two Hurricane Harvey CDBG-DR programs: 1) the Local Buyout & Acquisition Program and 2) the Local Infrastructure Program. After a public planning, review, and comment process beginning in early June; and two public planning hearings, final drafts of the GCRPC MODs are ready for submission to the Texas General Land Office (GLO). These final drafts are attached for your review.

This documentation is being submitted to the GLO as a final draft pending GCRPC Board of Directors approval on July 25, 2018. GCRPC Board Meeting details are available on the GCRPC Homepage at www.gcrpc.org.

Feel free to further distribute or post these materials as you see fit. Additionally, please continue to submit any questions or comments while the MOD is being reviewed for approval by the GCRPC Board of Directors and final approval by the Texas General Land Office.

Thank you for your consideration.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Friday, June 1, 2018 1:19 PM
To: 'eliasm@gcrpc.org'
Cc: 'hannahc@gcrpc.org'
Subject: Website Notices/Documents
Attachments: 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf; GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH_FINAL.pdf; 05292018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf

Tracking:	Recipient	Read
	'eliasm@gcrpc.org'	
	'hannahc@gcrpc.org'	
	Elias Moya	Read: 6/1/2018 1:24 PM
	hannahc@gcrpc.org	Read: 6/1/2018 3:56 PM

Eli,

These are the document/Public Notices that need to be posted on the GCRPC Website homepage.

For Bill:

The homepage can just have these hyperlinks:

- 1) "Public Notice – Method of Distribution Development - Hurricane Harvey CDBG-DR Funding
 - English
 - Spanish"

and

- 2) "6/1/2018 Draft Method of Distribution"

Linked to each appropriate document above – Public notices are labeled English/Spanish.

THANK YOU!!!!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Friday, June 1, 2018 1:19 PM
To: 'eliasm@gcrpc.org'
Cc: 'hannahc@gcrpc.org'
Subject: Website Notices/Documents
Attachments: 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf; GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH_FINAL.pdf; 05292018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf

Tracking:	Recipient	Read
	'eliasm@gcrpc.org'	
	'hannahc@gcrpc.org'	
	Elias Moya	Read: 6/1/2018 1:24 PM
	hannahc@gcrpc.org	Read: 6/1/2018 3:56 PM

Eli,

These are the document/Public Notices that need to be posted on the GCRPC Website homepage.

For Bill:

The homepage can just have these hyperlinks:

- 1) "Public Notice – Method of Distribution Development - Hurricane Harvey CDBG-DR Funding
 - English
 - Spanish"

and

- 2) "6/1/2018 Draft Method of Distribution"

Linked to each appropriate document above – Public notices are labeled English/Spanish.

THANK YOU!!!!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Monday, June 4, 2018 11:46 AM
To: 'Bill Beck'
Cc: 'Elias Moya'; 'Hanna Crone'
Subject: RE: Website Update Request
Attachments: FW: Website Update Request; GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH_FINAL.pdf; 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf

Tracking:	Recipient	Read
	'Bill Beck'	
	'Elias Moya'	
	'Hanna Crone'	
	hannahc@gcrpc.org	Read: 6/4/2018 11:50 AM
	Elias Moya	Read: 6/4/2018 12:56 PM

Hi Bill,

I double checked the website and the old attachment and hyperlinks are still on the homepage. There are some spelling errors (that are probably my fault) and the PDF linked to the Spanish Public Notice has formatting errors that I did not previously catch. I've attached the correct version of the Spanish Public Notice to replace currently linked PDF and the updated Draft Method of Distribution (PDF dated 06042018).

The corrected hyperlink text should read:

Public Notice – Method of Distribution Development – Hurricane Harvey CDBG-DR Funding – English

Aviso Público - Desarrollo del Método de Distribución - Huracán Harvey Community Development Block Grant Fondos de Recuperación de Desastres (CDBG-DR) – Español

Draft Method of Distribution 06/04/2018

Let me know if you have any questions. Thanks again!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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From: michaela@gcrpc.org
Sent: Thursday, June 7, 2018 1:00 PM
To: 'Bill Beck'
Cc: 'Elias Moya'; 'hannahc@gcrpc.org'
Subject: GCRPC Webpage Update
Attachments: BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT.pdf; 1. 06072018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Tracking:	Recipient	Read
	'Bill Beck'	
	'Elias Moya'	
	'hannahc@gcrpc.org'	
	Elias Moya	Read: 6/7/2018 1:09 PM
	hannahc@gcrpc.org	Read: 6/7/2018 1:28 PM

Hi Bill,

I have another update for the GCRPC homepage.

The two public notices (English/Spanish) will stay as is, no changes.

You can remove that last hyperlink ("Draft Method of Distribution 06/04/2018") and add the following text/hyperlinks with the attached PDFs:

Draft GCRPC Method of Distribution (Updated 6/7/2018) [no hyperlink]

1. MOD Narrative [link to PDF 1.]
2. Attachment 2 [Link to PDF 2.]
3. Attachment 3 [Link to PDF 3.]
4. Attachment 4 [Link to PDF 4.]
5. \$ Distribution Summary [Link to PDF "BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT"]

Let me know if you have any questions and thanks in advance!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.

michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Tuesday, June 19, 2018 2:33 PM
To: 'Bill Beck'
Cc: 'hannahc@gcrpc.org'; 'Susan Cerf'
Subject: Web Update
Attachments: 06182018_AGENDA_GCRPC_MOD_PublicHearing1.pdf; 06182018_FactSheet_GCRPC_MOD_PublicHearing1.pdf; 06182018_SignInSheet_GCRPC_MOD_PublicHearing1.pdf; FedRegVol83No28_HUD_2017-CDBG-DR.pdf; COG MOD guidance 4-19-18.pdf; HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD.pdf

Tracking:	Recipient	Read
	'Bill Beck'	
	'hannahc@gcrpc.org'	
	'Susan Cerf'	
	Susan Cerf	Read: 6/19/2018 2:54 PM
	hannahc@gcrpc.org	Read: 6/19/2018 3:14 PM

Good Afternoon Bill,

I've got another update for the commission's homepage.

Is it possible to take the five current documents and consolidate them under a single hyperlink?

If so, the update to the page would consist of that consolidation of old documents and the addition of a single hyperlink that also leads to multiple documents or links.

Remove:

Add:
(Homepage)
Draft Method of Distribution Documents (06/04/2018) [hyperlink link to new page #1 with 5 document links currently on the homepage]

Public Hearing #1 Documents (6/18/2018) [hyperlink to another new page with 6 hyperlinks]

(New page #1 – looks like the bottom of the homepage now, actual hyperlinks below copied from current homepage)

Draft Method of Distribution 06/04/2018

1. [MOD Narrative](#)
2. [Attachment 2](#)
3. [Attachment 3](#)
4. [Attachment 4](#)
5. [S Distribution Summary](#)

(New page #2 – using the attached PDFs)

Public Hearing #1, 06/18/2018

1. Agenda
2. Public Hearing #1 Fact Sheet
3. Sign-in Sheet
4. Federal Register / Federal Register / Vol. 83, No. 28 / Friday, February 9, 2018 / Notices
5. GLO – Councils of Governments Method of Distribution Guidelines [COG MOD guidance 4-19-18]
6. MOD Spreadsheets [“HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD”]

Let me know if you have any questions. I know this may be a little confusing as presented.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Wednesday, June 20, 2018 9:30 AM
To: 'Bill Beck'
Subject: RE: Web Update
Attachments: Re: Web Update

I took a look and refreshed the page a couple of times. I don't think the changes were applied. The homepage has not changed.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Monday, June 25, 2018 11:12 AM
To: 'Bill Beck'
Cc: 'hannahc@gcrpc.org'; 'Susan Cerf'
Subject: Website Update
Attachments: GCRPC_MOD_Website Hyperlink Titles - Format.docx; HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Tracking:	Recipient	Read
	'Bill Beck'	
	'hannahc@gcrpc.org'	
	'Susan Cerf'	
	hannahc@gcrpc.org	Read: 6/25/2018 11:34 AM

Good Morning Bill,

I have another update. This time I've attached a word document with the formatting for the home page and new pages. I've labeled items "New" if the item does not already exist on the page.

Also, can you give me an estimate of the hours you will invoice for any website work I've requested to date?

Thanks and let me know if you have any questions.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

Confidentiality Note

This email may contain information that is confidential or privileged and exempt from disclosure under applicable law. The information is intended to be solely for the use of the recipient(s) named in the email. If you are not an intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.

michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Tuesday, June 26, 2018 1:56 PM
To: 'Bill Beck'
Cc: 'Elias Moya'; 'hannahc@gcrpc.org'
Subject: FW: Website Update
Attachments: GCRPC_MOD_Website Hyperlink Titles - Format.docx; HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Tracking:	Recipient	Read
	'Bill Beck'	
	'Elias Moya'	
	'hannahc@gcrpc.org'	
	Elias Moya	Read: 6/26/2018 2:25 PM
	hannahc@gcrpc.org	Read: 6/26/2018 2:02 PM

Hi Bill,

Just wanted to follow up and make sure you received my request for a website update yesterday. These materials have been distributed via email but I need them posted as soon as possible to adhere to public comment period timelines.

Let me know if you have any questions.

Thanks,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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From: michaela@gcrpc.org <michaela@gcrpc.org>
Sent: Monday, June 25, 2018 11:12 AM
To: 'Bill Beck' <bbeck@oscenter.com>
Cc: 'hannahc@gcrpc.org' <hannahc@gcrpc.org>; 'Susan Cerf' <Susan.Cerf@glo.texas.gov>
Subject: Website Update

Good Morning Bill,

I have another update. This time I've attached a word document with the formatting for the home page and new pages. I've labeled items "New" if the item does not already exist on the page.

Also, can you give me an estimate of the hours you will invoice for any website work I've requested to date?

Thanks and let me know if you have any questions.

Michael Ada
Director of Economic Development, Response, & Recovery
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Fax (361) 578-6508

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Tuesday, June 26, 2018 3:42 PM
To: 'Bill Beck'
Cc: 'Bill Beck'; 'Elias Moya'; 'hannahc@gcrpc.org'
Subject: RE: FW: Website Update
Attachments: Re: FW: Website Update

Tracking:	Recipient	Read
	'Bill Beck'	
	'Bill Beck'	
	'Elias Moya'	
	'hannahc@gcrpc.org'	
	hannahc@gcrpc.org	Read: 6/26/2018 4:38 PM
	Elias Moya	Read: 6/27/2018 8:10 AM

Looks good and it's all working.

Thanks Bill!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Wednesday, July 11, 2018 4:50 PM
To: 'Bill Beck'
Cc: 'hannahc@gcrpc.org'; 'Elias Moya'
Subject: Website Update
Attachments: 07092018_AGENDA_GCRPC_MOD_PublicHearing2.pdf; 07062018_PublicHearing2_MainSlideShow_GCRPC_MOD.pdf; 07092018_FactSheet_GCRPC_MOD_PublicHearing2.pdf; 07092018_SignInSheet_GCRPC_MOD_PublicHearing2.pdf; FedRegVol83No28_HUD_2017-CDBG-DR.pdf; COG MOD guidance 4-19-18.pdf; HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf

Tracking:	Recipient	Read
	'Bill Beck'	
	'hannahc@gcrpc.org'	
	'Elias Moya'	
	hannahc@gcrpc.org	Read: 7/11/2018 4:52 PM
	Elias Moya	Read: 7/12/2018 9:24 AM

Hi Bill,

Can you update the website homepage with the following:

[UPDATE to Page 5 – See Attachments (attached in order) and link to each item below]

Public Hearing #2 Documents (7/9/2018)

- 1) Agenda
- 2) PowerPoint Presentation
- 3) Public Hearing #2 Fact Sheet
- 4) Sign-In Sheet
- 5) Federal Register / Vol. 83, No. 28 / Friday, February 9, 2018 / Notices
- 6) GLO – Councils of Governments Method of Distribution Guidelines
- 7) MOD Spreadsheets

Let me know if you have any questions.

Thanks!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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Advertising Statement

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1/1

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Fax: (361) 358-5323
URL: www.mysoutex.com

Golden Crescent Regional Planning
 1908 N. Laurent St
 Suite 600
 VICTORIA, TX 77901

Acct #: 02103244
Phone: (361)578-1587
Date: 06/30/2018
Due Date: 07/20/2018

PLEASE RETURN TOP PORTION WITH YOUR PAYMENT, RETAIN BOTTOM PORTION FOR YOUR RECORDS

Date	Trans #	Type	Description	Runs	Columns	Inches	Total
05/31/2018			Balance Forward				127.50
06/07/2018	301213094	INV	G 3x10.5 Public notice	1	3	31.50	267.75
06/11/2018	401202673	Check	Payment Check 67907 67907				-127.50
06/14/2018	301213550	INV	G 3x10.5 Public notice	1	3	31.50	267.75
06/21/2018	301214008	INV	G 3x10.5 Public notice	1	3	31.50	267.75
06/28/2018	301214774	INV	G 3x10.5 Public notice	1	3	31.50	267.75



Remarks

Reserve your spot in the 2018 High School Sports Preview for Inland and Coastal editions!

TERMS: Account due in full by 20th of the following month.

Total Due: \$ 1,071.00

June 18	May 18	April 18	March 18	February 18	January 18
\$ 1,071.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

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For accommodation requests or additional information about this posting, please call (361) 578-1587.

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para \$55,475,236 de **Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.**

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

- Lunes, el día **18 de junio del año 2018**, a la hora 9:00 a.m. en la Sala de Conferencias en Victoria Tower, situado por la calle 1908 N. Laurent, en el segundo piso, Victoria, Texas, 77901
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Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora 12:00 a.m., en el sitio Web del Internet www.gcrpc.org y también estará disponible para su revisión en los siguientes lugares:

- GCRPC, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten adaptaciones especiales, solicitudes de intérpretes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia.

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.

Gonzales Inquirer
 622 St. Paul
 Gonzales, TX 78629
 830-672-2861
 accounting@fenicecommunitymedia.com
 www.gonzalesinquirer.com



Statement

TO
 LOLLIE
 GOLDEN CRESCENT
 CINDY CORNISH
 1908 N. LAURENT SUITE 600
 VICTORIA, TX 77901

STATEMENT NO. 5074
 DATE 05/01/2018
 TOTAL DUE \$1,228.50
 ENCLOSED

DATE	SERVICE	AMOUNT	BALANCE
05/31/2018	Balance Forward		0.00
06/07/2018	Invoice #5009: 3X14 - PUBLIC COMMENT - ENGLISH/SPANISH - BW	346.50	346.50
06/14/2018	Invoice #5010: 3X14 - PUBLIC COMMENT - ENGLISH/SPANISH - BW	294.00	640.50
06/21/2018	Invoice #5011: 3X14 - PUBLIC COMMENT - ENGLISH/SPANISH - BW	294.00	934.50
06/28/2018	Invoice #5012: 3X14 - PUBLIC COMMENT - ENGLISH/SPANISH - BW	294.00	1,228.50

Current Due	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	90+ Days Past Due	Amount Due
588.00	640.50	0.00	0.00	0.00	\$1,228.50

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §

COUNTY OF GONZALES §

Before me, the undersigned authority, on this day personally appeared

TERRY FITZWATER, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the PUBLISHER
(title of newspaper representative)

of the GONZALES INQUIRER; that said newspaper is generally circulated
(name of newspaper)

in GONZALES, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

June, 7, 14, 21, 28, 2018

Terry Fitzwater
(newspaper representative's signature)

Subscribed and sworn to before me this the 3rd day of July, 2018,

to certify which witness my hand and seal of office.

Sanya D. Harkey
Notary Public in and for the State of Texas

(Seal)



Sanya D. Harkey
Print or Type Name of Notary Public

June 6, 2021
My Commission Expires

SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

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For accommodation requests or additional information about this posting, please call (361) 578-1587.

Serving Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca and Victoria counties
Equal Opportunity / Affirmative Action Employer

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para \$55,475,236 de Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

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El GCRPC recibirá comentarios adicionales por escrito desde el lunes, el día 4 de junio del año 2018, hasta el viernes, el día 9 de junio del año 2018. Los comentarios escritos deben recibirse a más tardar a la hora 5:00 p.m., el viernes, el día 9 de junio del año 2018, Atención: Michael Ada, director de desarrollo económico, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora

PUBLIC HEARING NOTICE CITY OF GONZALES CITY COUNCIL

The City Council of the City of Gonzales, by this instrument, notifies the public of a PUBLIC HEARING on the following project that will be presented to the City Council for their consideration:

PUBLIC HEARING for early citizen input regarding the use of City Funds for Fiscal Year Beginning October 1, 2018 and ending September 30, 2019.

The City Council will hold a Public Hearing June 14, 2018 at 6:00 p.m. at the Gonzales City Hall, 820 St. Joseph St., to allow for public comment on the upcoming budget.

The City Council encourages citizens to participate in the public comment and public hearing stages of all City Council projects. Citizens unable to attend meetings may submit their views to Kristina Vega, City Secretary for the City of Gonzales, by mailing them to P.O. Box 547, Gonzales, TX 78629. For additional information, contact the City Secretary office at (830)-672-2815.

I certify that a copy of the June 14, 2018, Notice of Public Hearing was posted on the City Municipal Building bulletin board on the 29th day of May 2018, at 5:00 p.m. and remained posted continuously for at least 16 days prior to the scheduled time of the meeting.

Kristina Vega, City Secretary



**FREI
MILITAR
SUBSCRIPTIO**

All active duty military personnel are eligible for renewal one-year subscription by calling Gonzales Inquiries or filling out the subscription form.

for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
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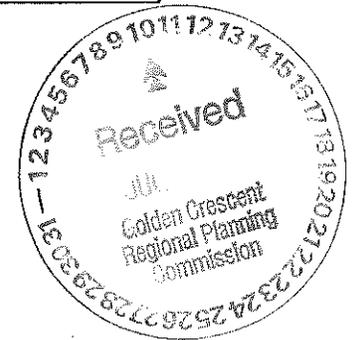
GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten

Hallettsville Tribune-Herald

P.O. Drawer 427
 Hallettsville, TX 77964
 (361) 798-2481

Statement

Date
6/30/2018



To:
Golden Crescent Regional Planning Commission 1908 N Laurent Ste 600 Victoria, TX 77901

		Amount Due	Amount Enc.		
		\$494.00			
Date	Transaction	Amount	Balance		
05/31/2018	Balance forward		121.50		
06/06/2018	2x9.5 - Combo - Soliciation for Public Comment	123.50	245.00		
06/13/2018	2x9.5 - Combo - Soliciation for Public Comment	123.50	368.50		
06/15/2018	PMT #67957.	-121.50	247.00		
06/20/2018	2x9.5 - Combo - Soliciation for Public Comment	123.50	370.50		
06/27/2018	2x9.5 - Combo - Soliciation for Public Comment	123.50	494.00		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
494.00	0.00	0.00	0.00	0.00	\$494.00

HALLETTSVILLE TRIBUNE-HERALD

Classified

NOTICES

NOTICES

NOTICES

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Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora 12:00 a.m., en el sitio Web del Internet www.gcrpc.org y también estará disponible para su revisión

NO.

ESTATE OF

LORENZO B. TAYLOR,

DECEASED

**NOTICE TO ALL PERSONS
THE ESTATE OF**

Notice is hereby given tary for the estate of Lorenzo B. Taylor, Deceased issued on May 31, 2018 in the County Court of Latt as Independent Ex

The residence of the Inc County, Texas. The post Lorenzo B. Taylor, Deceased bell & Riggs, P.c., 1980 F Houston, Texas 77056.

All persons having claim currently being administered within the time and in the

Dated the 15 day of June,

Respectfully submitted

CAMPBELL & RIGGS

By: Kelley M. Ben

State Bar No.:

Brian D. Corcoran

State Bar No.:

Emily M. Radke

State Bar No.:

1980 Post Office

Houston, Texas

(713) 621-672

(713) 621-545

bcorcorve@campbellandriggs.com

eradke@campbellandriggs.com

kbentley@campbellandriggs.com

ATTORNEYS FOR

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SEEKING CARING, dependable CNA/Caregivers, full time part time and PRN, to care for the elderly/disabled in Hallettsville and surrounding communities. Must pass drug screen and have clean criminal history. Helping Hearts Sitter Service 361-798-9400. (47-TFN-CF)

LOOKING FOR Detail, kitchen

and repairs as needed prior to painting. Questions: 361/596-7509 or 512/581-2826

Please submit bids prior to August 1, 2018:

Vic Christenson, Secretary
301 N. Lavaca

Lives Installed • All Plumbing Fixtures

Leroy Mikulencak - Owner

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SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

- GCRPC Conference Room located at 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC will provide for reasonable accommodations for persons attending the GCRPC public hearings. Public hearings will be conducted in English. Requests from persons needing special accommodations, requests for language interpreters, or requests for other special communication needs should be made at least 48 hours prior to each hearing.

For accommodation requests or additional information about this posting, please call (361) 578-1587.

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para \$55,475,236 de Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

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I BUY ANTIQUES and Collectibles. One piece to entire estate. 512-496-6556. (41-1-CH)

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PREGNANT? NEED HELP? Confidential and caring assistance available for the following needs: Emotional, Material, Spiritual, Educational. Providing immediate and practical help. We have a special concern for you and your unborn child. We await your call. Gabriel Project. Toll free: 1-866-627-9243. (24-TFN-NC)

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Jackson County Herald Tribune

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Statement of Account

Account Number	Statement Date	Due Date	Account Balance Aging				
			CURRENT	31-60	61-90	91-120	OVER 120
RA1701	06/30/18	07/15/18	\$1,344.00	\$0.00	\$0.00	\$0.00	\$0.00

LISA CORTINAS
GOLDEN CRESCENT REGIONAL PLANNING COMMISSION
1908 N. Laurent Street
Suite 600
VICTORIA, TX 77901

NET 10 DAYS. A late payment penalty of 1.5% per month will be added to charges past 30 days. Return the attached remittance stub with your payment. If you have any questions concerning this statement, contact our billing office at 361-782-3547.

Date	Type / No.	Description	Size	Total	Amount	Due
New Charges						
06/06/18	Inv. 82295	Display Inv. PUBLIC NOTICE-SPANISH Herald Tribune	3 X 7=21ci	\$168.00	\$168.00	\$168.00
06/06/18	Inv. 82299	Display Inv. PUBLIC NOTICE-ENGLISH Herald Tribune	3 X 7=21ci	\$168.00	\$168.00	\$168.00
06/13/18	Inv. 82296	Display Inv. PUBLIC NOTICE-SPANISH Herald Tribune	3 X 7=21ci	\$168.00	\$168.00	\$168.00
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Payments and Applications						
06/18/18	Pmt. 40625	Check 67959 \$136.50 applied to: Inv. 81846, 05/09/2018, HEALTHY AGING		-\$136.50		-\$0.00

Page 1 of 1

Total Due: **\$1,344.00**

Jackson County Herald Tribune

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Advertiser Information	Account No.	Total Due:
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Top 10 Industrial High School graduates and their chosen teachers from left are, front, Katri Reagan Doyle, Daniel Gonzales, and Kenneth Densman; and back, Miriam Patton, Cheryl Wery Marlow, and Sarah Bradley.

Top 10 seniors recognized by

The Industrial Education Foundation, along with In-teplast Group, hosted the 7th annual Academic Recognition and Awards Luncheon at In-teplast Café on Tuesday, May 22.

The event honored the top 10 students in the 2018 graduating class of the Industrial Independent School District High School along with their inspirational educators. Each top 10 graduate submitted written essays on one teacher that

influenced them the most during their journey through the Industrial District.

Tears were shed and memories shared as each graduate's moving testimony was read expressing appreciation for teachers, coaches, and other staff. The graduates and selected educators included: Lexey Mikulec – Chasity Matula, Jaron Hayden – Cheryl Weixelman, Kenneth (Jay) Densman – Sarah Bradley, Chessali Sackett – Lisa Bul-

lock, Katrina Wisofski Miriam Patton, Karaganl – Anne McCain, Reganl – Jenna Treybig, Daniel zales – Zachery Marlow, Darilek – Melody Vi Sam Smith – Kensey All Sam Smith shared i essay that Mr. Kensey A “impact extended far b the football field. Fu more, the example he s man will influence how the rest of my life”. Reagan Doyle was pr



GOLDEN CRESCENT REGIONAL PLANNING COMMISSION

1908 N Laurent, Suite 600, Victoria, TX 77901
(361) 578-1587 / Fax (361) 578-8865
www.gcrpc.org

Golden Crescent Economic Development District

June 1, 2018

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Industrial Education Foundation

say that Ms. Jenna Treybig was "always supportive through the ups and downs and I will be forever grateful for the impact she has had on my life."

Chessali Sackett chose Ms. Lisa Bullock as her favorite teacher and wrote that "Ms. Bullock has impacted my high school years greatly. She taught me to believe in myself and my capabilities."

All of the students shared the love and appreciation that

they had for their favorite educator.

IEF's mission is to provide resources that enrich teaching, inspire learning and skills development, and maximize innovation opportunities for all teachers and students – the mission coming to life is clearly visible on a day where students and staff are honored for their accomplishments. IEF would like to take this opportunity to thank all of community businesses and

individuals that support the organization.

IISD Superintendent Paul Darilek closed the event sharing that he was thankful to everyone in the district for this year's efforts. Darilek expressed sincere thanks "for taking in Chloe, a new senior to this class, and making her senior year wonderful. This first year at Industrial was exhausting, yet invigorating, and we are proud to be a part of the Cobra tradition."



GOLDEN CRESCENT REGIONAL PLANNING COMMISSION

1908 N Laurent, Suite 600, Victoria, TX 77901

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Golden Crescent Economic Development District

SOLICITUD DE COMENTARIO PÚBLICO

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From: michaela@gcrpc.org
Sent: Thursday, June 7, 2018 1:17 PM
To: Alejandro Camacho; Commissioner Alonzo Morales; david.hall@calhouncotx.org; Dolly Stokes; Dr. John McNeile; John Kaminski, Asst. City Manager; Joyce Dean; Judge P.T. (Pat) Calhoun; LaDonna Thigpen; Larry Garrett, DVM; Rebecca Murry; Sarah V. Quick 'Hanna Crone'
Cc:
Subject: Hurricane Harvey - Guidance Group: Funding Method of Distribution and Public Comment Info
Attachments: 1. 06072018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf; BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT.pdf; 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH.pdf; 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf

Tracking:	Recipient	Read
	Alejandro Camacho	
	Commissioner Alonzo Morales	
	david.hall@calhouncotx.org	
	Dolly Stokes	Read: 6/7/2018 1:29 PM
	Dr. John McNeile	
	John Kaminski, Asst. City Manager	
	Joyce Dean	Read: 6/7/2018 1:18 PM
	Judge P.T. (Pat) Calhoun	
	LaDonna Thigpen	
	Larry Garrett, DVM	
	Rebecca Murry	
	Sarah V. Quick	
	'Hanna Crone'	
	hannahc@gcrpc.org	Read: 6/7/2018 1:28 PM

Dear Guidance Group Members,

I've attached some items related to Disaster Recovery Funding that has been allocated to our region through the Department of Housing and Urban Development (HUD) and the Texas General Land Office for your information.

GCRPC has been tasked with developing a method of distribution for the funding and conducting public hearings throughout a public comment period.

These funds are to be utilized for the Home Buyout and Acquisition Program and the Local Infrastructure Program.

We welcome any and all comments regarding this project.

Additionally, GCRPC has finally acquired access to technology that may make it easier for everyone to participate in future Guidance Group activities. Skype for business will provide webinar/web conference capability for the group as we move forward. Be on the lookout for an invitation to join us for our next meeting.

Again, thanks for your participation in Guidance Group activities and please let me know if you have any questions or concerns.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Thursday, June 7, 2018 2:48 PM
Cc: 'Joe Brannan'; 'Hanna Crone'; 'Susan Cerf'; 'melodyl@gcrpc.org'
Subject: Community Development Block Grant - Disaster Recovery Funding - GCRPC Method of Distribution
Attachments: 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf; 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH.pdf; 1. 06072018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf; BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT.pdf

Tracking:

Recipient	Read
'Joe Brannan'	
'Hanna Crone'	
'Susan Cerf'	
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 'adriancannady@victoriaedc.com'
 'vedc@victoriaedc.com'
 'bmiska@cityofedna.com'
 'pkaup@portofvictoria.com'
 'info@wscnd.com'

Kristi K Rogers

Read: 6/8/2018 10:50 AM

Daryl Fowler

Read: 6/8/2018 9:05 AM

Susan Cerf

Read: 6/7/2018 6:24 PM

John Barth

Read: 6/7/2018 3:58 PM

Adrian Cannady

Read: 6/7/2018 3:21 PM

Annie Rodriguez

Read: 6/7/2018 2:56 PM

Gabriela Torres

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hannahc@gcrpc.org

Read: 6/7/2018 2:51 PM

Gary Burns

Deleted: 6/12/2018 9:35 AM

Richard Randle

Deleted: 6/26/2018 1:35 PM

Dear Elected Officials and Community Leaders,

The Golden Crescent Regional Planning Commission (GCRPC) was tasked by the Texas General Land Office (GLO) to develop Methods of Distribution (MODs) for Community Development Block Grant – Disaster Recovery Funding allocated to our seven county region in response to Hurricane Harvey.

The attached documents are being provided to insure you have the most recent versions of the Draft MODs and associated MOD Attachments. Additionally, copies of the English/Spanish Public Notices, released to encourage public participation in the MOD development process, have been included for your review, distribution, and posting in public spaces as you see fit. These public notices are currently being run in newspapers regionwide throughout the entire public comment period beginning June 3rd and ending on July 9th.

Let me know if you have any questions or comments regarding these materials or the MOD process.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-6508

Confidentiality Note

This email may contain information that is confidential or privileged and exempt from disclosure under applicable law. The information is intended to be solely for the use of the recipient(s) named in the email. If you are not an intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.

From: michaela@gcrpc.org
Sent: Thursday, June 14, 2018 10:04 AM
Cc: 'hannahc@gcrpc.org'; 'Susan Cerf'
Subject: Community Development Block Grant - Disaster Recovery Funding - GCRPC Method of Distribution

Attachments: 05282018_GCRPC_HH_CDBG-DR_MOD_Public-Notice_ENGLISH.pdf; GCRPC_HH_CDBG-DR_MOD_Public-Notice_SPANISH_FINAL.pdf; 1. 06072018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT.pdf; 4. 06042018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
'Susan Cerf'	
'carolvillarreal@hhsc.state.tx.us'	
'hector.amaya@hhsc.state.tx.us'	
'dalia.villa@bbtrails.org'	
'jtunnell@gulfbend.org'	
'lgrohman@devereux.com'	
'gschmidt@tisd.net'	
'srpohl@sbcglobal.net'	
'yhatx@sbcglobal.net'	
'goliadha@gmail.com'	
'jeangreen99@hotmail.com'	
'ehac@att.net'	
hannahc@gcrpc.org	Read: 6/14/2018 10:58 AM
Yorktown Housing Authority	Read: 6/14/2018 11:31 AM

Dear Housing and Public Health Sector Leadership,

The Golden Crescent Regional Planning Commission (GCRPC) was tasked by the Texas General Land Office (GLO) to develop Methods of Distribution (MODs) for Community Development Block Grant – Disaster Recovery Funding allocated to our seven county region in response to Hurricane Harvey.

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Let me know if you have any questions or comments regarding these materials or the MOD process.

Best Regards,

Michael Ada
Director of Economic Development, Response, & Recovery
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From: michaela@gcrpc.org
Sent: Monday, June 25, 2018 11:36 AM
To: 'hannahc@gcrpc.org'; 'Susan Cerf'
Subject: UPDATE - HUD CDBG-DR - Regional Method of Distribution
Attachments: HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Importance: High

Tracking:	Recipient	Read
	'hannahc@gcrpc.org'	
	'Susan Cerf'	
	Alejandro Camacho	
	Commissioner Alonzo Morales	
	david.hall@calhouncotx.org	
	Dolly Stokes	Read: 6/25/2018 11:50 AM
	Dr. John McNeile	
	John Kaminski, Asst. City Manager	
	Joyce Dean	Read: 6/25/2018 11:57 AM
	Judge P.T. (Pat) Calhoun	
	LaDonna Thigpen	
	Larry Garrett, DVM	
	Rebecca Murry	
	Sarah V. Quick	
	hannahc@gcrpc.org	Read: 6/25/2018 11:49 AM

Regional Recovery & Resilience Guidance Group Members,

The attached documentation is being provided to you for your consideration as community leaders, members of the public, and members of the Guidance Group.

The public comment period began on Sunday June 3, 2018 and will end on July 9, 2018, at 5:00 p.m..

These Methods of Distribution (MODs) concern over \$54 million in federal funding for Hurricane Harvey related Housing Buyouts and Acquisitions, as well as, Local Infrastructure Projects. There have been changes made to the previously published MODs as a result of errors found, public comments, and amended/clarified Texas General Land Office guidance.

Additional documentation is available through our website homepage at www.gcrpc.org. Feel free to contact me if you have any questions or if you wish to submit public comment(s).

Best Regards,

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Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
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Fax (361) 578-6508

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From: michaela@gcrpc.org
Sent: Monday, June 25, 2018 11:51 AM
To: 'hannahc@gcrpc.org'; 'melodyl@gcrpc.org'
Cc: 'Susan Cerf'
Subject: UPDATE - HUD CDBG-DR - Regional Method of Distribution
Attachments: HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Tracking:

Recipient	Read
'hannahc@gcrpc.org'	
'melodyl@gcrpc.org'	
'Susan Cerf'	
Charlotte Baker	
'mike.pfeifer@calhouncotx.org'	
'lois.kolkhorst@senate.texas.gov'	
'geanie.morrison@house.texas.gov'	
'pcmayor2016@yahoo.com'	
'jwhitlow@portlavaca.org'	
'Daryl.fowler@co.dewitt.tx.us'	
'mayor@cityofcuero.com'	
'mayor@cityofhallettsville.org'	
'citymanager@cityofyoakum.org'	
'office@yorktowntx.com'	
Judge P.T. (Pat) Calhoun	
'citysec@cityofmoulton.com'	
'citysecretary@cityofgonzales.org'	
'citysecretary@goliadtx.net'	
'countyjudge089@co.gonzales.tx.us'	
'ckacir@cityofgonzales.org'	
'smileytx@gvec.net'	
'd.simons@co.jackson.tx.us'	
'ddoering@cityofedna.com'	
'cityofedna@cityofedna.com'	
'cityofnordheim@att.net'	
'danap@lavacacounty.net'	
'zim1958@att.net'	
'ppolasek@victoriatx.org'	
'citymanager@victoriatx.org'	
John Kaminski, Asst. City Manager	

Recipient**Read**

'judgetw@lavacounty.net'
'ktlafleur@yahoo.com'
'jsoliz@victoriatx.org'
'amorales@goliadcountytexas.gov'
'annier@jacobs-webber.com'
'monmac@tisd.net'
'Efs1@att.net'
'perezrb40@yahoo.com'
'comishjeb@ykc.com'
'countyjudge089@co.gonzales.tx.us'
'gburns@vctx.org'
'wedierlam@gmail.com'
'seadrift@tisd.net'
'comm@lavacounty.net'
'adaniels@gbra.org'
'cpap@papacek.net'
'richard.randle@co.dewitt.tx.us'
'ajsummers3196@att.net'
'chuck.benavides@goliadtx.net'
'Daryl.fowler@co.dewitt.tx.us'
'pcalhoun@goliadcountytexas.gov'
'd.simons@co.jackson.tx.us'
'bzeller@vctx.org'
'mayor@cityofcuero.com'
'cityofedna@cityofedna.com'
'Ganado@cityofganado.com'
'citysecretary@cityofgonzales.org'
'jcozza@cityofhallettsville.org'
'Koch_m@yahoo.com'
'erv-mary@sbcglobal.net'
'nixoncityclerk@gvec.net'
'cityofnordheim@att.net'
'pcmayer2016@yahoo.com'
'indianolatrader@yahoo.com'
'fredhilscher@sbcglobal.net'
'smileytx@gvec.net'
'ppolasek@victoriatx.org'
'cwaelder@gvtc.com'
'annier@jacobs-weber.com'
'yorktownmayor@sbcglobal.net'

Recipient**Read**

'bturner@portlavaca.org'
 'pcomfort@tisd.net'
 'rzella@cityofcuero.com'
 'jbarth@yorktowntx.gov'
 'citymanager@cityofgonzales.org'
 'mdzepeda@hotmail.com'
 'ddoering@cityofedna.com'
 'Ganado@ykc.com'
 'citymanager@cityofyoakum.org'
 'tbowe@cityofyoakum.org'
 'city_of_shiner@sbcglobal.net'
 'citysec@cityofmoulton.com'
 'cgarrett@victoriatx.org'
 'trudia.preston@goliadtx.net'
 'citysecretary@goliadtx.net'
 'mike.pfeifer@calhouncotx.org'
 'mayor@cityofhallettsville.org'
 'pkennedy@cityofcuero.com'
 'cueroed@cityofcuero.com'
 'glawing@gcec.org'
 'humphreysj@uhv.edu'
 'adriancannady@victoriaedc.com'
 'vedc@victoriaedc.com'
 'bmiska@cityofedna.com'
 'pkaup@portofvictoria.com'
 'info@wsccnd.com'

City Secretary

Read: 6/25/2018 11:56 AM

hannahc@gcrpc.org

Read: 6/25/2018 11:52 AM

Paul Polasek

Read: 6/25/2018 12:01 PM

sharonbarnard@victoriaedc.com

Read: 6/25/2018 12:02 PM

John Barth

Read: 6/25/2018 1:21 PM

Gabriela Torres

Read: 6/25/2018 2:07 PM

Kristi K Rogers

Read: 6/25/2018 4:13 PM

Daryl Fowler

Read: 6/26/2018 9:38 AM

Gary Burns

Read: 6/26/2018 10:15 AM

Richard Randle

Deleted: 6/26/2018 1:35 PM

Dear Elected Officials and Community Leaders:

The attached documentation is an update to the previously published Draft Regional Methods of Distribution (MODs). As a reminder, the public comment period began on Sunday June 3, 2018 and will end on July 9, 2018, at 5:00 p.m.. GCRPC will conduct its second public hearing concerning these MODs on Monday, July 9, 2018.

These Methods of Distribution (MODs) concern over \$54 million in federal funding for Hurricane Harvey related Housing Buyouts and Acquisitions, as well as, Local Infrastructure Projects.

NOTE: There have been changes made to the previously published MODs as a result of errors found, public comments, and amended/clarified Texas General Land Office guidance. All previously published documentation and public hearing information is available through our website homepage at www.gcrpc.org.

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Director of Economic Development, Response, & Recovery
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Fax (361) 578-6508

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Sent: Monday, June 25, 2018 11:58 AM
To: 'hannahc@gcrpc.org'
Cc: 'Susan Cerf'
Subject: UPDATE - HUD CDBG-DR - Regional Method of Distribution
Attachments: HUD-GLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Importance: High

Tracking:	Recipient	Read
	'hannahc@gcrpc.org'	
	'Susan Cerf'	
	'carolvillarreal@hhsc.state.tx.us'	
	'hector.amaya@hhsc.state.tx.us'	
	'dalia.villa@bbtrails.org'	
	'jtunnell@gulfbend.org'	
	'lgrohman@devereux.com'	
	'gschmidt@tisd.net'	
	'srpohl@sbcglobal.net'	
	'yhatx@sbcglobal.net'	
	'goliadha@gmail.com'	
	'jeangreen99@hotmail.com'	
	'ehac@att.net'	
	hannahc@gcrpc.org	Read: 6/25/2018 12:57 PM

Dear Housing and Public Health Sector Leadership:

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Golden Crescent Regional Planning Commission
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Fax (361) 578-6508

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Statement

Moulton Eagle

P.O. Box 427
 Hallettsville, TX 77964
 (361) 798-2481

Date
6/30/2018



To:
Golden Crescent Reg Planning 1908 N Laurent St Ste 600 Victoria, TX 77901

Amount Due	Amount Enc.
\$448.40	

Date	Transaction	Amount	Balance		
05/31/2018	Balance forward		79.88		
06/07/2018	2x9.5 - Combo - Soliciation for Public Comment	112.10	191.98		
06/14/2018	2x9.5 - Combo - Soliciation for Public Comment	112.10	304.08		
06/15/2018	PMT #67964.	-79.88	224.20		
06/21/2018	2x9.5 - Combo - Soliciation for Public Comment	112.10	336.30		
06/28/2018	2x9.5 - Combo - Soliciation for Public Comment	112.10	448.40		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
448.40	0.00	0.00	0.00	0.00	\$448.40

0; 700-800: 112-134.
 55-182.50; 200-300:
 0: 132-154; 500-600:
 00-800 Lbs.: 100-121.
 : 155-215.

018
ST WEEK: 1613
 ay. The packer market
 are increasing further
 oday were at the same
 re is hope that market

d of the last few weeks
 a weak futures market
 quality calves were fully
 l-\$6/cwt.
 arket for lighterweights.

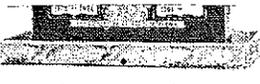
40-58; Light & Weak:

0 Lbs.: None; 200-249
 5; 300-350 Lbs.: 148-
 0 Lbs.: 144-170; 450-
 2-162; 550-600 Lbs.:
 0-800 Lbs.: 125-137.
 0 Lbs.: 134-194; 250-
 5-176; 350-400 Lbs.:
 50-500 Lbs.: 147-168;
 s.: 137-150; 600-700
 0.
 r 200 Lbs.: 132-185;
 s.: 137-155; 300-350
 00-450 Lbs.: 142-170;
 s.: 136-156; 550-600
 35-replacement heifer;

**VILLE
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WEDSDAY
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**YOU
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**STOCK
 N CO.**
RIDAY
 Paid!
business!
 Cuero



A Modern Memorial
For Your Departed Loved One

Isn't this the least
 you could do?
 Call us or come by soon.

Ben & Marian Darilek
 (361) 596-7009

Pesek-Hermes
Memorial, Inc.
Serving Moulton & surrounding area

Tuesday, June 12
 Enchilada casserole,
 red beans, crackers, jello

Wednesday, June 13
 Baked chicken, dress-
 ing, zucchini, banana
 pudding

Thursday, June 14
 Beef steak w/gravy,
 whipped potatoes, green
 beans, peaches

Friday, June 15
*Centers closed - Sack
 Lunch for home delivery*

Flatonia Livestock Commission Co.
Sale Every Monday 11:00 am

361-865-3538 Fax 361-865-2111

"Selling your Livestock is our Business"
 Hauling Available

Ronnie Beck (Owner) **Ron Beck, Jr.**
 361-865-2579 Home 361-865-2775 Home
 979-561-6170 Mobile 361-772-4806 Mobile

We appreciate your Business! Family Owned & Operated



Lavaca County
CRIME STOPPERS
Crime of the Week

*Lavaca County Crime Stoppers Serving and Protecting
 the Citizens and Businesses of Lavaca County*

The following subjects have warrants for their arrests:

- Angel Aguayo, w/m (dob 09/08/95)
- Santo Portillo, w/m (dob 04/17/81)
- Brenda Beltran Rosales, off (dob 08/01/72)

If you have information on the current location of these subjects, call
 Lavaca County Crimestoppers at (361) 594-3700 for a cash reward.
 Any information you give will remain confidential, including your identity.



Speed Queen

**BUILT TO DO 25 YEARS
 WORTH OF LAUNDRY**

**INDUSTRY-BEST
 WARRANTY**

SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds. Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901. Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

- GCRPC Conference Room located at 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC will provide for reasonable accommodations for persons attending the GCRPC public hearings. Public hearings will be conducted in English. Requests from persons needing special accommodations, requests for language interpreters, or requests for other special communication needs should be made at least 48 hours prior to each hearing.

For accommodation requests or additional information about this posting, please call (361) 578-1587.

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para \$55,475,236 de Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

- Lunes, el día **18 de junio del año 2018**, a la hora 9:00 a.m. en la Sala de Conferencias en Victoria Tower, situado por la calle 1908 N. Laurent, en el segundo piso, Victoria, Texas, 77901
- Lunes, el día **19 de julio del año 2018**, a la hora 9:00 a.m. por la calle 120 S. Main; segundo piso, en la Sala de Conferencias de Sam Houston, Victoria, Texas, 77901.

El GCRPC recibirá comentarios adicionales por escrito desde el lunes, el día 4 de junio del año 2018, hasta el viernes, el día 9 de junio del año 2018. Los comentarios escritos deben recibirse a más tardar a la hora 5:00 p.m., el viernes, el día 9 de junio del año 2018, Atención: Michael Ada, director de desarrollo económico, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora 12:00 a.m., en el sitio Web del Internet www.gcrpc.org y también estará disponible para su revisión en los siguientes lugares:

- GCRPC, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten adaptaciones especiales, solicitudes de intérpretes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia. Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.

Your Life - Your newspaper
THE MOULTON EAGLE
"WE'RE MOULTON PROUD!"

Port Lavaca Wave

PO Box 88
Port Lavaca TX 77979

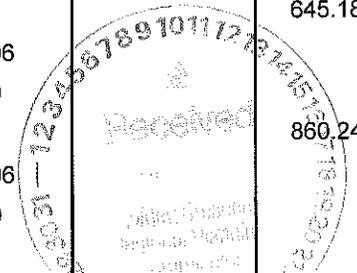
ADVERTISING INVOICE / STATEMENT

BILLING DATE	TERMS OF PAYMENT
06/30/2018	Port Lavaca Standard Terms

BILLED ACCOUNT
GOLDEN CRESCENT REGIONAL PLANNING COMMISSION 1908 N. LAURENT, STE 600 VICTORIA, TX 77901

BILLED ACCOUNT NO.	AGENCY/CLIENT
00000361	00000361
NAME OF AGENCY/CLIENT	
GOLDEN CRESCENT REGIONAL PLANNING	

DATE	TRANS #	DESCRIPTION	INCHES	RATE	CHARGES	PAYMENTS	AMOUNT
05/31/2018		Balance Forward					176.63
06/06/2018	300031985	#1081 Soliciation for Public 01 The Wave - #1081 03 The Wave Online -	3 x 9.75	0.10 0.10	212.06 3.00		391.69
06/13/2018	300032087	#1081 Soliciation for Public 01 The Wave - #1081 03 The Wave Online -	3 x 9.75	0.10 0.10	212.06 3.00		606.75
06/19/2018	400007958	Payment Check 67968				-176.63	430.12
06/20/2018	300032184	#1081 Soliciation for Public 01 The Wave - #1081 03 The Wave Online -	3 x 9.75	0.10 0.10	212.06 3.00		645.18
06/27/2018	300032344	#1081 Soliciation for Public 01 The Wave - #1081 03 The Wave Online -	3 x 9.75	0.10 0.10	212.06 3.00		860.24



Balance Forward	Total Payments	Total Charges	Total Inches	TOTAL NET AMOUNT DUE
176.63	-176.63	860.24	351	860.24

CURRENT	AGING			
	1 - 30	31 - 60	61 - 90	91 - 120
\$ 860.24	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

TERMS - NET 30 DAYS. ALL PAST DUE CHARGES ARE SUBJECT TO A SERVICE CHARGE OF 1.5% PER

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THE STATE OF TEXAS §
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Schelly Bartels, being duly sworn on his/her oath states that he/she is an authorized representative of The Port Lavaca Wave and that said newspaper meets the requirements of Section 2051.044 of the Texas Government code, to wit:

1. It devotes not less than twenty-five percent (25%) of its total column lineage to general interest items;
2. It is published at least once each week;
3. It is entered as second-class postal matter in the county where it is published;
4. It has been published regularly and continuously since 1891;
5. It is generally circulated within Calhoun County.

(CLIPPING)(S)



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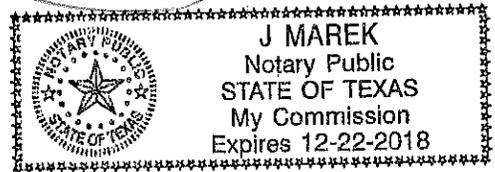
6/6, 6/13, 6/20, 6/27, 7/4, A.D. 2018

Schelly Bartels

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Schelly Bartels

- a) is personally known to me, or
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On this the 5 day of July, A.D. 2018,
to certify which witness my hand and seal of office

J. Marek
Judy Marek
Notary Public, State of Texas

SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, June 18, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

- Monday, July 9, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

- GCRPC Conference Room located at 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC will provide for reasonable accommodations for persons attending the GCRPC public hearings. Public hearings will be conducted in English. Requests from persons needing special accommodations, requests for language interpreters, or requests for other special communication needs should be made at least 48 hours prior to each hearing.

For accommodation requests or additional information about this posting, please call (361) 578-1587.

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la media luna dorada) está buscando aportes del público sobre el método de distribución para \$55,475,236 de Huracán Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Desastres.

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:

- Lunes, el día 18 de junio del año 2018, a la hora 9:00 a.m. en la Sala de Conferencias en Victoria Tower, situado por la calle 1908 N. Laurent, en el segundo piso, Victoria, Texas, 77901

- Lunes, el día 19 de julio del año 2018, a la hora 9:00 a.m. por la calle 120 S. Main; segundo piso, en la Sala de Conferencias de Sam Houston, Victoria, Texas, 77901.

El GCRPC recibirá comentarios adicionales por escrito desde el lunes, el día 4 de junio del año 2018, hasta el viernes, el día 9 de junio del año 2018. Los comentarios escritos deben recibirse a más tardar a la hora 5:00 p.m., el viernes, el día 9 de junio del año 2018, Atención: Michael Ada, director de desarrollo económico, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

Un proyecto de método de distribución se publicará a partir del lunes, el día 4 de junio del año 2018, a la hora 12:00 a.m., en el sitio Web del Internet www.gcrpc.org y también estará disponible para su revisión en los siguientes lugares:

- GCRPC, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inglés. Las solicitudes de personas que necesiten adaptaciones especiales, solicitudes de intérpretes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia.

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.

(#1081)

GET YOU

Sandcrabs got big win, look toward Friday's game vs. Lamar Consolidated. Page B1

THE PORT LAVACA WAVE

Galveston County's Newspaper As Constant As The Waves - Since 1990

75 CENTS Volume 126, No. 99 PLWAVE.COM Wednesday, September 27, 2018

City makes progress in brush debris removal

By NOLA WEBER
The City of Victoria has made significant progress in the removal of brush debris from the city's streets and public areas. The city's brush debris removal crews have been working hard to clear up the mess left behind by Hurricane Harvey. The city's brush debris removal crews have been working hard to clear up the mess left behind by Hurricane Harvey. The city's brush debris removal crews have been working hard to clear up the mess left behind by Hurricane Harvey.

Volunteers bag 'Harvey' debris, trash during beach cleanup

By NOLA WEBER
A group of volunteers gathered at the beach to help with the cleanup of debris and trash left behind by Hurricane Harvey. The volunteers spent the day picking up trash and debris from the beach. The volunteers spent the day picking up trash and debris from the beach. The volunteers spent the day picking up trash and debris from the beach.

THE MIRACLE BOAT



Sea grant agent, business team to rescue vessels that were damaged by Harvey

By NOLA WEBER
A team of experts is working to rescue and recover vessels that were damaged by Hurricane Harvey. The team includes a sea grant agent and a business team. The team includes a sea grant agent and a business team. The team includes a sea grant agent and a business team.

'Harvey' takes her home a tax office but not her spirit

By NOLA WEBER
A woman whose home was destroyed by Hurricane Harvey has found a new place to live. She has moved to a new home, but she says she still feels the pain of losing her old home. She has moved to a new home, but she says she still feels the pain of losing her old home. She has moved to a new home, but she says she still feels the pain of losing her old home.

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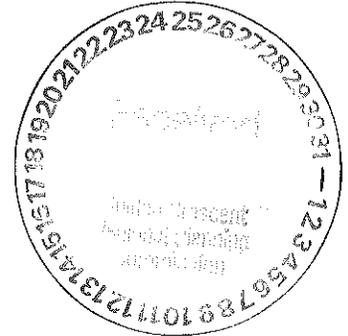
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Revista de Victoria

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Michael Ada
GCRPC
1908 N Laurent, Ste. 600
Victoria, TX 77901



June 18, 2018

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to the community," said Glenn. "I feel confident that there are great things ahead and I'm eager to take advantage of all the skills and abilities that are already there."

Pending approval from the UH System Board of Regents, Glenn is expected to succeed Vic Morgan. Last year, Morgan announced he would retire as UHV president in fall 2018. He took the reins as interim president in 2014 and was named president in 2016.

A thorough and exhaustive national search was conducted to fill the UHV presidency, chaired by former UH System Regent Roger Welder and Dona Cornell, vice chancellor of legal affairs and general counsel for the UH System. Aided by an executive search firm, the presidential search committee – which includes representatives

to become the director of student services. His father, grandfather and great-grandfather all attended the school. He received a Master

and concentrations in the arts and sciences, business administration, education, health professions and human development fields.

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SOLICIATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for \$55,475,236 in **Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds**.

Written and oral comments regarding the Method of Distribution will be taken at public hearings scheduled for the following dates, times, and locations:

- Monday, **June 18, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- Monday, **July 9, 2018**, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901. A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

- GCRPC Conference Room located at 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

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For accommodation requests or additional information about this posting, please call (361) 578-1587.

Public Comments

GCRPC CDBG-DR Methods of Distribution

Public Comment and Response Overview

I. PUBLIC COMMENT(S) RECEIVED FROM JUNE 6TH THROUGH JUNE 18TH, 2018:

No public comments received.

II. ORAL PUBLIC COMMENT(S) RECEIVED AND RESPONSES GIVEN DURING PUBLIC HEARING#1:

- **BRUCE SPITZENGEL**, President, GrantWorks
 1. **Why are where entities with eminent domain authority included in the draft allocation for the Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD)?**

Response:

Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Councils of Government/Regional Planning Commissions for regional MOD development.

2. **What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?**

Response:

Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

3. **CDBG-DR funds should remain within regions for redistribution at the discretion of each county under which an allocation is made through the approved Methods of Distribution.**

[No oral response provided. Comment recorded.]

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria
 1. **When can public comments be submitted?**

Response:

At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

2. **Is there a required format for public comments?**

Response:

No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission (GCRPC) staff in the task of recording and organizing any comments made.

III. PUBLIC COMMENT(S) RECEIVED FROM JUNE 19TH THROUGH JULY 9TH, 2018:

- **JOHN KAMINSKI**, Assistant City Manager, City of Victoria, *received 6/27/2018 via letter*



June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1908 N. Laurent Street
Victoria, TX 77901

Re: Public Comments on Proposed GCRPC Method of Distribution (MOD) – Hurricane Harvey CDBG-DR LBAP and LIP Funding

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled "1.06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf", primarily address and clarify which entities are eligible to receive funds for the Local Buyout/Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

The City of Victoria has one additional comment on the revised version of the proposed MOD. Our comment is in regards to the proposed reallocation method for LBAP and LIP funds. The revised MOD states "Reallocation of LBAP funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region." The same language is repeated in the reallocation paragraph for LIP funds. It is respectfully requested that the GLO consider first reallocating such funds at the County level before returning them to the region-wide 80% pool.

Within Victoria County, the City and County of Victoria are the only two entities to receive LBAP and LIP funding through the revised MOD. It is our belief that if either of these two entities fails to utilize their full allocation of funds, the other entity within the County should have an opportunity to apply for such de-obligated funds before they are rolled back into the region-wide 80% allocation.

Thank you for the opportunity to submit public comments and thank you for your ongoing efforts to assist local entities within the Golden Crescent Region with the implementation of post-Harvey disaster recovery programs.

Respectfully submitted,



John K. Kaminski
Assistant City Manager

P. O. BOX 1758 VICTORIA, TX 77902
PHONE (361) 485-3030 • FAX (361) 485-3534
www.victoriatx.org

[No response provided. Comment recorded.]

- **RICK MCBRAYER**, Emergency Management Coordinator, Victoria Office of Emergency Management, *received 7/3/2018 via email*

- A. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?**

Response:

Entities with eminent domain authority within the region were compiled using the Texas Comptroller's Online Eminent Domain Database (COEDD). <https://coedd.comptroller.texas.gov/>.

Bloomington ISD, local water control districts, and The Port of Victoria are either 1) Non-compliant with Texas Government Code, Chapter 2206, Subchapter D, or 2) they do not have eminent domain authority.

*The Comptroller's database only provides info on **compliant** entities.*

Example: Quail Creek MUD is listed as having an Eminent Domain function with TCEQ; However, they are not included in the Comptroller's database.

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the MOD.

- **HANNAH DYAL, Staff Attorney**, Texas RioGrande Legal Aid, Corpus Christi, received 7/9/2018 via email/attachment.

- A. GCRPC should conduct a regional needs assessment to better understand the extent of damage in the GCRPC eligible counties and meet its goal of equitable regional recovery**

Response:

GCRPC is a voluntary association of local governments within the seven-county region of Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, and Victoria counties. GCRPC was tasked by the GLO to develop a public participation plan and facilitate the MOD development process. GCRPC was given approximately sixty (60) calendar days to complete the task with parameters set forth in the document entitled "Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines," available for review at <http://www.gcrpc.org/gcrpc-PublicHearing.html>. The guidance provides that "[e]ach COG will be provided data sets produced by the GLO in partnership with the University of Texas at Austin to inform methods of distribution[;] [v]ariences from these data sets will be allowable."¹

While the use of data produced by "[c]onduct[ing] a regional needs assessment to better evaluate whether the extent to which properties were rendered inhabitable as result of the storm [sic]" is allowable, this suggested GCRPC activity falls outside of the scope of work tasked to GCRPC by the GLO.

Additionally, GCRPC is in possession of Small Business Administration and Insurance award data provided by, and pre-approved for use by, the GLO. However, the suggestion for use of

such data does not provide a solution to incorporate new data into the currently developed draft MOD formulas.

B. The MOD should establish criteria for areas to qualify for buyout programs.

Response:

The Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines¹ provide:

“1. Local Buyout and Acquisition Program

The local buyout and acquisition program will remove homes from harm’s way. [sic]

a. Local MOD Requirements:

- i. Each COG will facilitate a MOD process with support of the GLO;*
- ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);*
- iii. Citizen participation process:*
 - 1. Develop a citizen participation plan;*
 - 2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;*
 - 3. One (1) public hearing shall be a “Public Planning Meeting;”*
 - 4. Ensure a public comment period of at least 14 days.*
- iv. Implement a minimum of \$1,000,000 in CDGB-DR funds to any local entity receiving funding through the MOD*
- v. Ensure a minimum percentage of funds are allocated to the HUD most impacted and distressed counties and zip codes;*
- vi. Facilitate local prioritization through the MOD;*
- vii. Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region;*
- viii. A plan to meet the 70 percent low- and moderate-income benefit requirement;*
- ix. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.”*

GCRPC has established the draft objective criteria for allocation of funds to the various eligible entities according to the GLO requirements stated above. Population data, FEMA Individual Assistance Data, Unmet Need calculations, Social Vulnerability data, and a resilience factor are the objective criteria utilized.

The current draft MOD distribute funds to all eligible entities for all eligible activities in order to provide eligible entities with maximum flexibility to administer their respective local programs. Conditions of funding for all eligible entities include the requirement that any entity use 70% of its allocation to benefit Low-to-Moderate Income households, as well as, the requirement that funding be utilized to address HUD and GLO priorities as stated in the Federal Register and State Action Plan.

C. The MOD should standardize the benefits provided in buyout programs

Response:

GCRPC is not a sub-recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds. Thus, this comment goes beyond the scope of GCRPC's current task(s). Per GLO guidance, eligible entities identified in the MOD are the planned subrecipients tasked with administration of funds for each program. Funding is conditioned on each eligible entity administering these programs in adherence to HUD & GLO priorities, requirements, and guidelines.

- **Brennan Griffin, Deputy Director**, Texas Appleseed, *received 7/9/2018 via email/attachment.*

A. [A] description of methodology and attached allocation tables do not constitute a MOD according to the “Councils of Government Method of Distribution Guidance” issued by GLO. The required MOD Summary form is not included, so the draft does not document:

- **The Citizen Participation Plan and its implementation;**
- **An explanation of how the MOD fosters long term planning and recovery;**
- **An explanation of how unmet housing needs will be met; or,**
- **How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.**

Therefore, GCRPC has not published a MOD for public comment, and must publish a compliant document for 14 days of public comment according to its Citizen Participation Plan.

Response:

The GLO “required MOD Summary form” is a working document intended to summarize 1) the MOD public development process and 2) the final Draft MOD submitted for review and approval by the GLO. All form responses concisely reiterate the resulting methodology developed throughout the public planning process. GCRPC has published, and continuously updated, draft

MOD materials for public review and comment since June 4, 2018. Compliance with GLO Guidelines will be confirmed by the GLO after the submission of GCRPC MOD Materials on July 13, 2018.

- B. We recommend that GCRPC, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions, and that an accountability system is set up to make sure that local jurisdictions are abiding by the program guidelines.**

Response:

The GCRPC is a regional voluntary association of local governments and other agencies. HUD and GLO rules for Local Buyout and Acquisition Program funding require eligible entities directly receive and administer program funds. GCRPC stands ready to assist regional membership upon the request, direction, and approval of its Board of Directors and membership.

- C. We are also concerned that GCRPC has chosen to use the threshold allocation of \$1,000,000 as a cap on local buyout programs.**

Response:

HUD and GLO rules require a minimum (floor) \$1,000,000 allocation to eligible entities to ensure the viability and efficacy of local buyout and acquisition programs.

- D. Infrastructure programs must prioritize the needs of low- and middle-income households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. A key issue for many of these communities is environmental justice, as they were impacted not only by flooding but also by hazards related to chemicals, oils, sewage, waste or air pollution during the event... We appreciate GCRPC's effort to take this social vulnerability into account. Our concern is that local jurisdictions won't follow through with these guidelines, and so we suggest that an accountability program is set in place to ensure all jurisdictions are abiding by these norms.**

Response:

Eligible entities who receive and utilize CDBG-DR funding are required to adhere to all HUD and GLO conditions of funding. Additionally, eligible entities must still submit project proposals for review and approval by the GLO and HUD prior to the expenditure of program funds.

- E. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously**

enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

Response:

GCRPC is not identified as an eligible direct recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds.

- F. We strongly recommend that GCRPC use the methodology proposed by the Texas Low Income Housing Information Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household's FVL to their income, thereby considering the level of impact on a household, acknowledging the loss valuation variations produced by the FEMA/HUD methodology, and more accurately counts households with unmet housing needs that are the least able to recover and most vulnerable to housing insecurity.**

Response:

This recommendation has been recorded and will be submitted to the GCRPC Board of Directors and GLO for consideration.

IV. ORAL PUBLIC COMMENT(S) RECEIVED AND RESPONSES GIVEN DURING PUBLIC HEARING#2:

- **Dina Hardwick, Texas RioGrande Legal Aid**

- A. How is Low to Moderate Income (LMI) status calculated?**

Response:

70% of allocated funds must benefit 51% or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI). Census block groups that have a LMI population of 51 percent or more have been identified using HUD's 2017 Low- and Moderate-Income Summary Data.

- B. Who decides if pre-storm or post-storm market value will be utilized in the Local Buyout and Acquisition program?**

Response:

Each entity administering a Local Buyout and Acquisition program will determine which value to utilize.

- C. The GLO is currently conducting a Housing Needs Assessment with the assistance of the University of Texas at Austin; where and how will the resulting data from the assessment be utilized?**

Response:

For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Marett Hanes,**
 - A. What department from the University of Texas at Austin is conducting the Housing Needs Assessment?**

Response:

The University of Texas at Austin, IC² Institute, Bureau of Business Research. For more information go to <https://ic2.utexas.edu/bbr-harvey-survey/>.

- **Stacy Kirkham, City of Seadrift Resident**
 - A. What happens if the GLO or HUD determines there are deficiencies or issues with the submitted GCRPC Method of Distribution?**

Response:

GLO will inform GCRPC of any deficiencies and provide guidance on how deficiencies may be addressed.

- B. How long will the HUD-GLO review take?**

Response:

The deadline for submission of MODs is Friday, July 13, 2018. GLO has estimated they may begin responding as early as the last week of July.

- C. When will funding be awarded to eligible entities/communities?**

Response:

Eligible entities will be required to submit project proposals to the GLO. Guidance regarding project proposal format will be provided by GLO. Awards will follow review and approval of an eligible entity's proposed projects.

NOTE: All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.



July 9, 2018

Golden Crescent Regional Planning Commission
Attn: Michael Ada, Director of Economic Development
1908 N. Laurent, Suite 600
Victoria, Texas, 77901
Submitted via email to: michaela@gcrpc.org

Re: Texas Appleseed Comments on GCRPC MOD for Disaster Recovery: Hurricane Harvey

Dear Mr. Ada,

We appreciate the opportunity to provide comments on the GCRPC Plan for Disaster Recovery: Hurricane Harvey, covering \$110,413,925 in Community Development Block Grant for Disaster Recovery (CDBG-DR) funds allocated by the U.S. Department of Housing and Urban Development (HUD) by Federal Register Notice, 83 F.R. 5844, February 9, 2018.

Texas Appleseed is a public interest justice center that works to change unjust laws and policies that prevent Texans from realizing their full potential. Since Hurricanes Katrina and Rita in 2005, Texas Appleseed has worked with a network of organizations in Texas, including housing advocates, policy experts, and grassroots community groups, to ensure that all Texas families are able to recover in the wake of a natural disaster, that communities are rebuilt to be more resilient, and that all families have the opportunity to live in safe, decent neighborhoods with equal access to educational and economic opportunity.

While we appreciate the detailed explanation of GCRPC's methodology, a description of methodology and attached allocation tables do not constitute a MOD according to the "Councils of Government Method of Distribution Guidance" issued by GLO. The required MOD Summary form is not included, so the draft does not document:

- The Citizen Participation Plan and its implementation;
- An explanation of how the MOD fosters long term planning and recovery;
- An explanation of how unmet housing needs will be met; or,
- How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.

Therefore, GCRPC has not published a MOD for public comment, and must publish a compliant document for 14 days of public comment according to its Citizen Participation Plan.

While GCRPC has not yet published a draft MOD, we offer the following comments for that draft MOD:

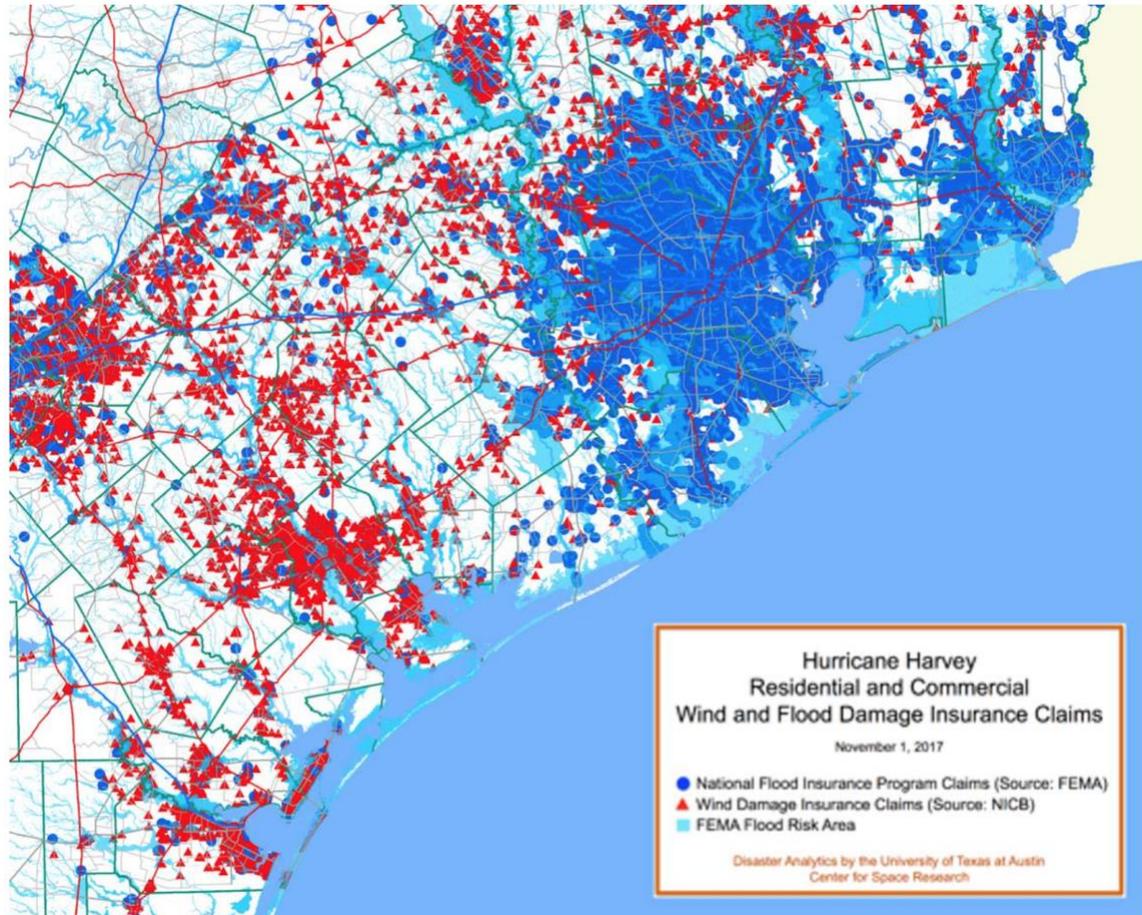
A. Local Buyout and Acquisition Program:

The Buyout and Acquisition Program's allocation methodology is seriously flawed.

First, it assumes damage weights will reflect the suitability of these areas for buyouts, Within the GCRPC region, the majority of Harvey damage claims appear to be caused by wind and not



flooding, which is not the case in all parts of the disaster area. This is based on the damage claims map provided in the state Action Plan. For those wind-damaged units, buyouts will not solve the problem, which is why it is necessary to distinguish whether the FVL was caused by wind or flooding in order to truly consider suitability of damaged homes for buyouts.



Second, local jurisdictions and GCRPC must make use of data available through the National Flood Insurance Program about concentrations of repetitive loss properties in order to allocate this funding. The Community Rating System (CRS) offers jurisdictions advice on locating concentration areas of repetitive loss properties, collecting remote data on these properties and determining the cause of the ongoing flooding problems there. This type of investigation will be essential in locating areas that are suited to buyouts, as opposed to individual homes that were damaged and should be rebuilt with mitigation in mind or areas where poor infrastructure is to blame.

Program guidelines for this buyout program must be developed in a transparent process with extensive community input. Local communities must have a citizen participation process for drafting buyout guidelines. Regardless of whether these planned buyouts are voluntary or



mandatory, relocating, away from an existing community or a home that has been in a family for generations, can be difficult and even traumatic. Without planning and community buy-in, a voluntary individual buyout program can result in a patchwork of empty and occupied homes, creating a blighted neighborhood. One of the critical issues in ensuring a successful buyout program is equity and ensuring that program rules and processes do not have a disparate impact on particular groups of homeowners.

Local buyout and acquisition programs must also prioritize LMI households in floodways and floodplains, who have the least resources with which to relocate on their own, leaving them a choice between housing instability and potential homelessness, or continuing to live in homes that may be structurally compromised or present health risks because of mold. It is particularly critical for LMI families that this buyout program includes not only acquisition and demolition, but relocation payments and other assistance and incentives as well. As the Federal Register Notice states, “a buyout program that merely pays homeowners to leave their existing homes does not result in a low- and moderate-income household occupying a residential structure and, thus, cannot meet the requirements of the LMH national objective.” (83 FR 5863) Local buyout programs should include plans to build housing in safer areas.

Low- and moderate-income households must be provided with enough funds that the choice to move is a realistic one (or to ensure that they can actually move to a safer area in the case of mandatory buyouts.) The worst-case scenario is that families who accept a buyout are unable to find housing in safer areas and are forced to move back into their original or less safe neighborhoods.

The decision of whether to use pre- or post-storm home value is an important one. In particular, using the pre-storm value of a home to determine disaster recovery program benefit limits often has a discriminatory impact on the basis of race or ethnicity as well. Following Hurricane Katrina, the National Fair Housing Alliance (NFHA), the Greater New Orleans Fair Housing Action Center (GNOFAC), and African-American homeowners sued the State of Louisiana and the U.S. Department of Housing and Urban Development (HUD) alleging racial discrimination in the State’s CDBG-DR funded Road Home Program, which provided grants to homeowners to repair or rebuild their homes. The original grant formula was based on the pre-storm value of a home, which resulted in African-American homeowners receiving less repair money than White homeowners, because their homes were located in neighborhoods with lower home values based on market discrimination and the legacy of segregation. Many African-American families were left unable to complete repairs or return home or living in uninhabitable houses. As Louisiana Congressman Cedric Richmond said when the case was settled in 2011,

[e]veryone knew that the Road Home formula for calculating grant awards was deeply flawed and punished folks in neighborhoods where home values were lower. . . . After all, if two families are both rebuilding a three bedroom home then their construction costs will be the same—regardless of the neighborhood. In that case, each family deserves the same assistance from their government. Unfortunately, the flawed formula was effectively discriminatory, locking many families out of equitable assistance.



GCRPC's and local program guidelines must ensure that buyout and acquisition programs are consistent regardless of whether the cost is funded by FEMA or CDBG-DR. CDBG-DR funding could be used to provide additional funds for LMI families in FEMA programs that would not provide them with enough funding to move, for example. GCRPC should be particularly careful that they are not using a program that provides lesser benefits to serve communities and homeowners of color. **Local program guidelines must be identical, no family should have unequal access to disaster recovery simply because of where they live.** We recommend that GCRPC, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions, and that an accountability system is set up to make sure that local jurisdictions are abiding by the program guidelines.

We are also concerned that GCRPC has chosen to use the threshold allocation of \$1,000,000 as a cap on local buyout programs. Small amounts of funding are not sufficient to engage in a well-planned buyout program that does not result in "checker-boarding" of neighborhoods or strain resources and city services (due to the continued need to serve areas that have been partially bought out). One million dollars, which is the cutoff for any jurisdiction to receive its own buyout funding (before it is rolled up to the next highest jurisdiction) is not enough to fund a significant buyout program that doesn't exacerbate these problems. Buyout programs need to be concentrated in areas that have repetitive flood losses that can only be addressed through an organized acquisition program that offers households sufficient money to move to an equivalent home in a safer area.

B. Local Infrastructure Program

Resilience is the ability to withstand and recover from disasters quickly, in a way that mitigates future damage and vulnerability, and in a way that goes beyond physical infrastructure. We commend GCRPC for considering the important role that resiliency has within this recovery process. Low-income communities and communities of color are disproportionately affected by and have a harder time recovering from a disaster because of both geographic and social vulnerability forced on them by segregation, discrimination, and often the cumulative effects of previous disasters, on wealth and access to opportunity. For its Natural Disaster Resilience Competition (NDRC) HUD defined a resilient community as one which "is able to resist and rapidly recover from disasters or other shocks with minimal outside assistance," and that plan and implement disaster recovery that mitigates future threats "while also improving quality of life for existing residents and making communities more resilient to economic stresses or other shocks." Improving the quality of life for existing residents and making them more resilient to other shocks, including economic stress that can push middle and working class families into poverty following a disaster, is at the core of our concern for equity in disaster recovery.

Infrastructure programs must prioritize the needs of low- and middle-income households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. A key issue for many of these communities is environmental justice, as they were impacted not only by flooding but also by hazards related to chemicals, oils, sewage, waste or air pollution during the event. Neighborhoods that were doubly impacted



by floodwaters polluted with chemicals, oils, waste, or sewage should be prioritized for mitigation as well. We appreciate GCRPC's effort to take this social vulnerability into account. Our concern is that local jurisdictions won't follow through with these guidelines, and so we suggest that an accountability program is set in place to ensure all jurisdictions are abiding by these norms.

Also key to economic recovery and future resilience is ensuring that the jobs generated by recovery projects and programs are filled by local workers and those who lost jobs because of Harvey to create real jobs and job training for community residents, and create additional opportunities for community businesses. An economic development program that provides loans to small business will not be successful unless that business has access to a workforce. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

Other options for increasing the number of jobs going to affected individuals and communities are ensuring that contractor qualifications include a commitment to local hiring and best value bidding processes that give more points to bidders who can comply with job quality and targeted hiring standards. CDBG-DR presents an opportunity to leverage housing and infrastructure funds into economic development funds as well.

C. Needs Assessment and Funding Allocation

We appreciate the great detail that GCRPC has included in their MOD methodology, including definitions of the various factors. However, because this methodology is based on incomplete FEMA data and the methodology provided by HUD and GLO, we are concerned that GCRPC will not be accurately addressing the critical housing and infrastructure needs of low and moderate income people in the area. The methodology provided by HUD and GLO for determining unmet housing needs underestimates the amount of loss to low-income populations. Using this methodology will not include the severity of damage suffered by low-income homeowners and distort the geographic allocation of money based on that standard.

Using FEMA Verified Loss (FVL) of real property (owners) to determine unmet need at the State level found that 54% of affected homeowners had no unmet needs on the basis that their FVL



was below the thresholds set for the FEMA damage categories. However, when this is broken down by income level, 69 percent of extremely low-income (ELI) owners were found to have no unmet needs. Conversely, only 41 percent of non-LMI owners were found to have no unmet needs. The conclusion, based on FEMA data, that families making less than 30% of Area Median Income (AMI), which, for example, is \$12,060 in the Beaumont-Port Arthur MSA and \$13,100 in the Corpus Christi MSA, have been better able to recover than families making more than double that amount is simply not credible. The inaccuracy of this calculation is borne out by a study conducted by the Episcopal Health Foundation and the Kaiser Family Foundation three months after Hurricane Harvey. The study found that lower-income families and Black and Latinx Texans were less likely to have homeowners', renters', or flood insurance, and that,

[n]early half (46%) say they or someone else in their household lost job-related income as a result of the storm, such as getting fewer hours at work (32%), losing a job entirely (12%) or losing income from a small business or unpaid missed days (32%). These income disruptions affected a greater share of Hispanic (65%) and Black (46%) residents compared to White residents (31%).

Lower- and even middle-income families are less likely to have the savings and access to credit that let them access safe housing (including more immediate repairs) and are more likely to be forced to relocate far from jobs and schools, to live in overcrowded housing or double up with family or friends, remain in unsafe housing, or become homeless.

The primary purpose of the CDBG program is to benefit LMI populations, yet the HUD methodology the State and therefore GCRPC are using has the clear, disproportionate effect on LMI populations of excluding them from the unmet needs assessment conclusions. This disproportionate effect is not only on low- and moderate-income Texans, but on Black and Latinx populations as well.

Using this methodology means that GCRPC is budgeting for unmet housing needs with the expectation that most LMI households, who fall into lower level damage categories if they are represented at all, are not severely damaged and will not need their homes rebuilt. While the average FVL for non-LMI homeowners was about twice that of ELI owners, the average income for non-LMI owners is over 14 times that of ELI owners. This methodology underrepresents LMI housing needs by income level, particularly misrepresenting the level of unmet rental housing need for ELI families. GCRPC's use of HUD's provided method for damage categories to weight the geographic distribution of CDBG-DR funds, therefore, will end up allocating resources away from areas that need them the most, affecting not only those families, but those communities as a whole.

Texas Appleseed supports the use of a data-based formula to allocate federal disaster recovery funds. But that formula must be adjusted to account for deficiencies in FEMA and other data and ensure that the needs of all Texans affected by Hurricane Harvey are taken into account. We strongly recommend that GCRPC use the methodology proposed by the Texas Low Income Housing Information Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household's FVL to their income, thereby considering the

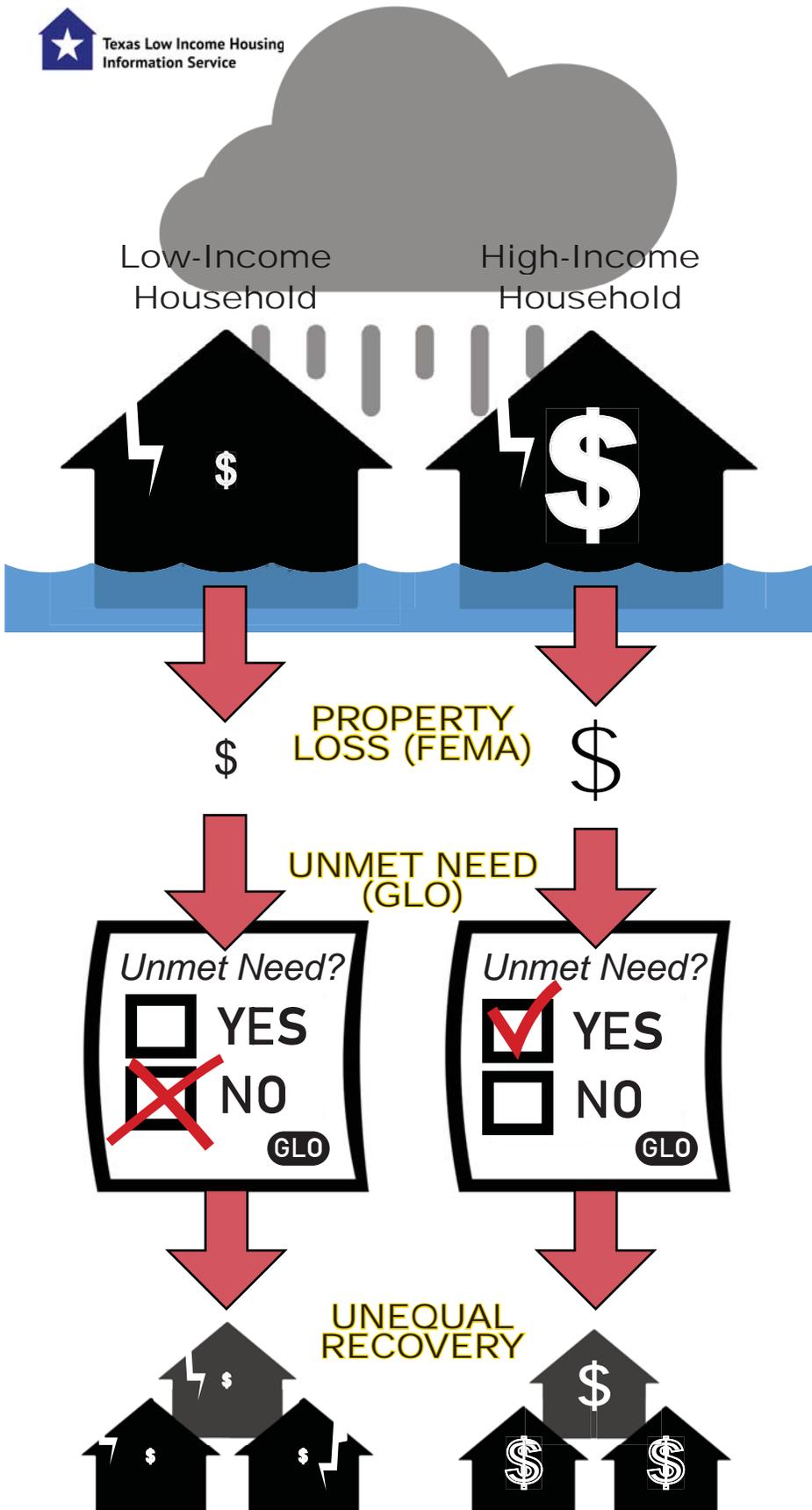


level of impact on a household, acknowledging the loss valuation variations produced by the FEMA/HUD methodology, and more accurately counts households with unmet housing needs that are the least able to recover and most vulnerable to housing insecurity. This method also ensures that the geographic allocation of funding addresses the actual levels of unmet housing needs in each locality.

In conclusion, we appreciate GCRPC's work on the MOD methodology and disaster recovery in general, and we look forward to seeing your MOD. Please let us know if we can provide further information or be helpful in any way.

Brennan Griffin
Deputy Director
Texas Appleseed
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How Texas is Underestimating Unmet Need for Low-Income Families



Assessing “Unmet Need”

FEMA collects information on the disaster’s impact on **PROPERTY**, not **PEOPLE**. Lower-income households have fewer financial resources to recover, but households with higher incomes generally have more property to lose.

When a disaster hits, homes may be impacted similarly, but when FEMA verifies their property loss (FVL), lower-income households have significantly lower average loss.

This already results in unequal distribution of assistance, but the problems are compounded in the long-term recovery phase. This is because the Texas General Land Office (GLO) is using this FEMA data to determine the unmet housing need in affected areas. This assessment determines where long-term recovery funding will go.

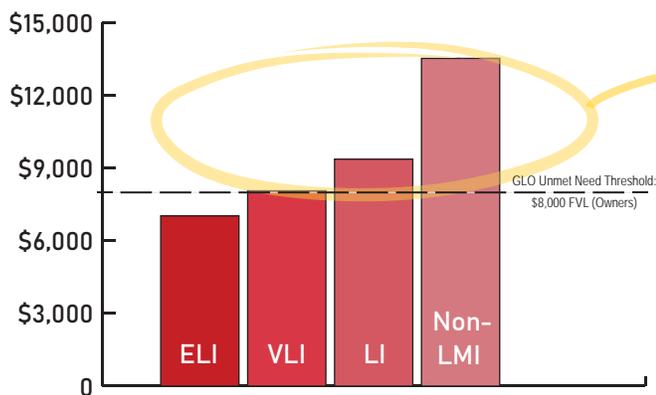
The GLO uses an arbitrary threshold of \$8,000 of FVL for owners and \$2,000 for renters when calculating the unmet need amount per household. This assumes that any loss under that amount can be taken care of without additional funds and is not considered “unmet need”.

As a result, the property loss of many low-income households is not included in the unmet need calculation. This means the GLO does not consider this loss when allocating funding to different areas of the state. Areas with more low-income residents will see less funding than is really needed for their recovery.

How we can do BETTER!

How we define and count “Unmet Need” matters for disaster recovery. If we systematically fail to count low-income* households, we will systematically fail to fund them in the long-term recovery phase. Crucially, these households are much less likely to have the funds to recover on their own. Below is a comparison of the GLO’s methodology and Texas Housers’ proposed methodology.

GLO Methodology: A Standardized Threshold



Average FEMA-Verified Loss (FVL) by Income Category

A standardized threshold that doesn't take into account household income excludes most low-income households from the unmet need calculation. As a result...

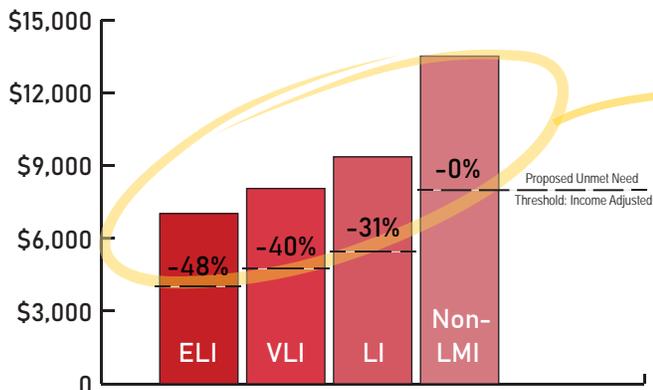
69%

of ELI owners are excluded from the count (compared to only 41% of non-LMI owners)



Proposed Methodology: An Income-Adjusted Threshold

For each income level, the \$8000 threshold for owners is reduced proportionately to the average FVL for each income group. For example, the average FVL for ELI owners is 48% lower than the average for Non-LMI households. Therefore, the \$8000 threshold is lowered 48%, as illustrated in the chart below.



Average FEMA-Verified Loss (FVL) by Income Category

An income-adjusted threshold allows the assessment to capture damage to low-income households! As a result...

an additional

49%

would be budgeted for ELI owners under this methodology.



* Income Category	Income
Extremely Low Income (ELI)	0-30% AMI
Very Low Income (VLI)	30-50% AMI
Low Income (LI)	50-80% AMI
Not Low or Median Income (Non-LMI)	80%+ AMI

Texas' Most Undercounted Zipcodes

The stakes are high when assessing the unmet housing need of disaster survivors. In some areas of Texas, especially those that are home to many low-income families, being undercounted could mean being passed over for the funds necessary to bring people back to safe, affordable and comfortable homes. Below are the most severely undercounted zip codes in the state of Texas.

Most Underfunded Renters

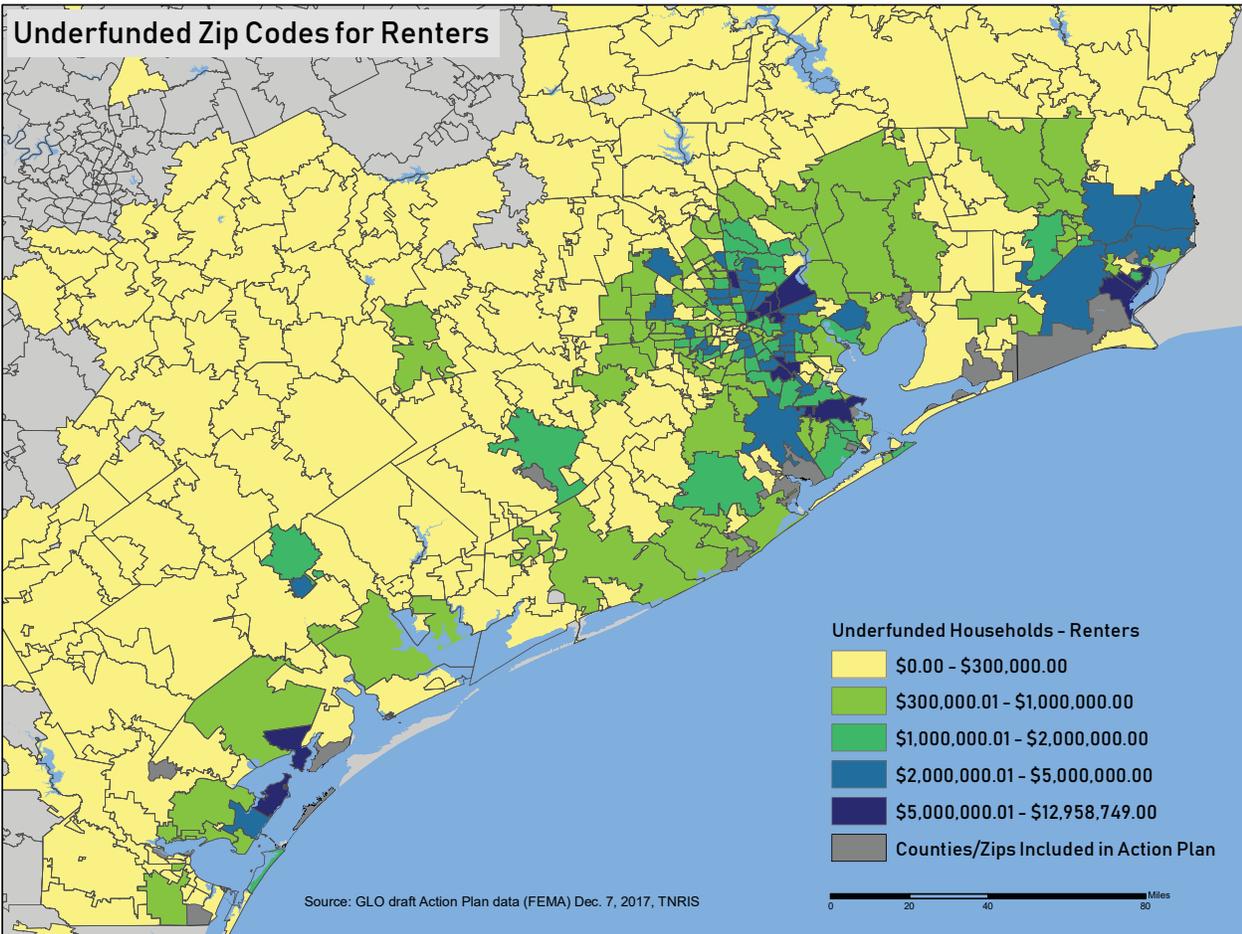
Rank	Zip Code	Area	Additional Unmet Need*
1	77642	Port Arthur	\$12,958,749
2	77026	Houston - Kashmere Gardens, Fifth Ward	\$9,381,477
3	77060	Houston - Greater Greenspoint	\$8,288,539
4	77078	East Houston, East Little York, uninc. Harris County	\$6,212,408
5	77539	Texas City, Dickinson, League City	\$6,161,407
6	77640	Port Arthur	\$5,868,615
7	77044	Lake Houston and unincorporated Harris County	\$5,830,581
8	78382	Rockport, Fulton, uninc. Aransas County	\$5,665,630
9	77013	Houston - Northshore, El Dorado/Oates Prairie	\$5,313,404
10	77028	Houston - Trinity, Kashmere Gardens, Settegast, East Houston	\$5,129,894
11	77089	Houston - Southbelt/Ellington and uninc. Harris County	\$5,008,949
12	77034	Houston - South Belt/Ellington, Edgebrook, Clear Lake	\$5,002,261
13	77084	Houston - Addicks Park Ten, uninc. Harris County	\$4,793,499
14	77096	Houston - Meyerland, Willow Meadows, Westbury, Brays Oaks	\$4,162,645
15	77016	Houston - East Little York/Homestead, Trinity/Houston Gardens	\$4,052,771
16	78336	Aransas Pass, Ingleside, uninc. Aransas and San Patricio County	\$3,862,106
17	77015	Houston - Northshore, Galena Park, uninc. Harris County	\$3,568,755
18	77630	Orange, West Orange, Pinehurst, uninc. Orange County (south)	\$3,455,848
19	77090	Houston - Greater Greenspoint, uninc. Harris County	\$3,410,527
20	77075	Houston - Greater Hobby, South Belt/Ellington	\$3,392,014
		TOTAL	\$111,520,079

Most Underfunded Owners

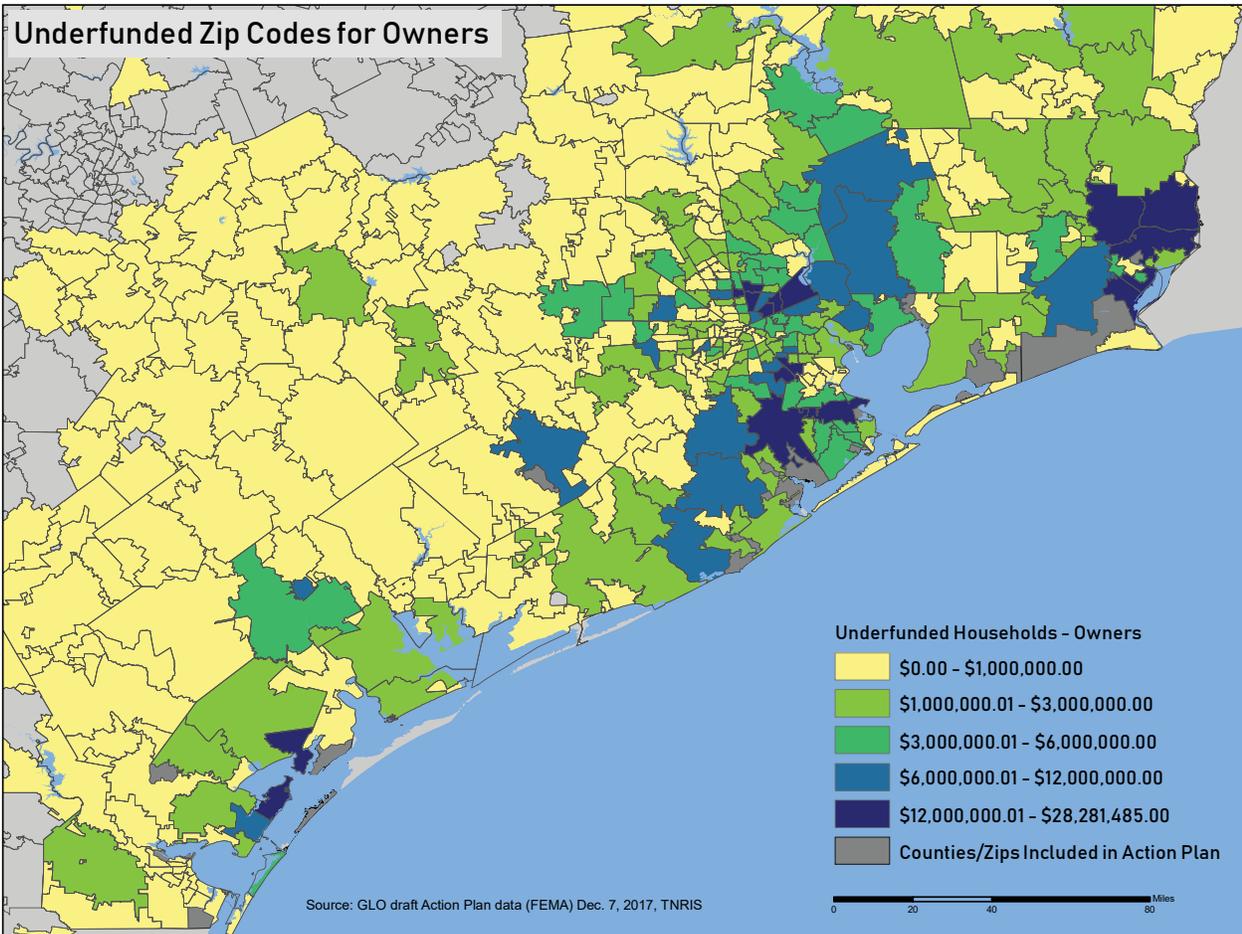
Rank	Zip Code	Area	Additional Unmet Need*
1	77642	Port Arthur	\$28,281,485
2	77044	Lake Houston and unincorporated Harris County	\$27,154,740
3	77539	Texas City, Dickinson, League City	\$21,640,536
4	77037	Houston - Greenspoint	\$21,325,458
5	77662	Vidor, Pine Forest, Rose City, uninc. Jefferson County	\$21,181,682
6	77640	Port Arthur	\$20,920,065
7	77028	Houston - East Houston, Trinity/Houston Gardens, Settagast, Kashmere Gardens	\$20,424,860
8	77089	Houston - Southbelt/Ellington and uninc. Harris County	\$18,824,792
9	77034	Houston - South Belt/Ellington, Edgebrook, Clear Lake	\$16,511,824
10	77039	Houston - Greater Greenspoint	\$15,487,093
11	78382	Rockport, Fulton, uninc. Aransas County	\$15,163,049
12	77630	Orange, West Orange, Pinehurst, uninc. Orange County (south)	\$14,570,598
13	77632	Orange, uninc. Orange County (north)	\$14,549,859
14	77078	East Houston, East Little York, uninc. Harris County	\$14,162,279
15	77511	Alvin, Hillcrest, League City, uninc. Brazoria and Galveston Counties	\$14,047,116
16	77093	Houston - Eastex-Jensen Area, uninc. Harris County	\$12,065,163
17	77587	South Houston (city)	\$11,007,245
18	77535	Dayton, Dayton Lakes, Kenefick, Liberty, Mont Belvieu, Old River-Winfree, uninc. Liberty County	\$10,838,771
19	77075	Houston - Greater Hobby, South Belt/Ellington	\$10,484,490
20	77084	Houston - Addicks Park Ten, uninc. Harris County	\$10,408,647
		TOTAL	\$339,049,752

*This is based not just on added LMI households, but also on already included households moving to a higher damage category.

Underfunded Zip Codes for Renters



Underfunded Zip Codes for Owners





June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1908 N. Laurent Street
Victoria, TX 77901

Re: Public Comments on Proposed GCRPC Method of Distribution (MOD) – Hurricane Harvey CDBG-DR LBAP and LIP Funding

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled "1.06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf", primarily address and clarify which entities are eligible to receive funds for the Local Buyout/Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

The City of Victoria has one additional comment on the revised version of the proposed MOD. Our comment is in regards to the proposed reallocation method for LBAP and LIP funds. The revised MOD states "Reallocation of LBAP funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region." The same language is repeated in the reallocation paragraph for LIP funds. It is respectfully requested that the GLO consider first reallocating such funds at the County level before returning them to the region-wide 80% pool.

Within Victoria County, the City and County of Victoria are the only two entities to receive LBAP and LIP funding through the revised MOD. It is our belief that if either of these two entities fails to utilize their full allocation of funds, the other entity within the County should have an opportunity to apply for such de-obligated funds before they are rolled back into the region-wide 80% allocation.

Thank you for the opportunity to submit public comments and thank you for your ongoing efforts to assist local entities within the Golden Crescent Region with the implementation of post-Harvey disaster recovery programs.

Respectfully submitted,

John K. Kaminski
Assistant City Manager



LAW OFFICE OF
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Corpus Christi -Pueblo Office
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July 9, 2018

Joe E. Brannan
Golden Crescent Regional Planning Commission
1908 N. Laurent, Suite 600
Victoria, TX 77901

Via email: jbrannan@gcrpc.org

**In Re: GCRPC Method of Distribution for Community Development Block Grant –
Disaster Recovery Program Disaster Recovery Allocation for Hurricane Harvey**

Dear Mr. Brannan,

Below are comments on the Golden Crescent Regional Planning Commission's (GCRPC) draft Method of Distribution (MOD) for Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

The majority of these comments focus on the buyout/acquisition program. However, the same comments apply to the infrastructure allocation methodology.

- 1. GCRPC should conduct a regional needs assessment to better understand the extent of damage in the GCRPC eligible counties and meet its goal of equitable regional recovery**

In its allocation methodology, GCRPC calculates FEMA Verified Loss figures for those individuals who filed FEMA claims following Hurricane Harvey. These figures likely misrepresent the extent of damage experienced by low-income property owners and thus is building a bias against the damage done to low-income neighborhoods into its allocation methods.

Data obtained by Texas Housers, an organization dedicated to supporting Texans in the pursuit of affordable and accessible housing throughout the State, indicates that the average value of FVL increases as the income of a household increases.¹ For homeowners who earn 30% or less of area median income the state-wide average for FVL was \$7,028 which is just less than half that for non-LMI households.² Any attempt to explain the discrepancy in these figures would be

¹ Housers SAP comments, 7.

² HSAP coms 7.

conjectures as very little is publicly available as to what goes into an FVL determination.³

Despite the disparity in damage FVL data indicates, LMI households are just as, if not more, likely to experience devastation as a result of flooding than their wealthier counterparts.⁴ This is true for the low-income household of Texas following Hurricane Harvey. In the coastal counties impacted by the storm, households of color and low-income households were more likely to be impacted by property damage or loss.⁵ This means that any county with wealthier households impacted by the storm is likely favored in the outcome of GCRPC's calculations.

An equitable recovery plan requires an allocation methodology that recognizes the flaws in existing data sets. It should seek to correct any unintentional biases that may be present in the available figures. Instead of relying on just the FVL figures to allocate funds, it should conduct a regional needs assessment to better evaluate whether the extent to which properties were rendered inhabitable as a result of the storm. The GLO's draft Housing Guidelines permit COGs to use qualified data sources approved by GLO in advance in their needs assessments.⁶ These include SBA or Insurance awards, as well as other forms of data. GCRPC should make an effort to quantify damage beyond the flawed FVL figures it is currently relying on. In doing so it will design a methodology that captures the full extent of damage inflicted because of Harvey.

2. The MOD should establish criteria for areas to qualify for buyout programs.

The MOD draft does not articulate criteria to determine which areas qualify for buyouts. In its State Action Plan, the General Land Office tasked the regional Councils of Government (COGs) with "establish[ing] objective criteria for allocation of funds to eligible entities and activities".⁷ Although the current MOD draft uses data to prioritize funding for the four counties in its area (the eligible entities), it establishes no criteria to allocate funds to buyout activities.

GCRPC's current method of allocation considers the total harm that each county experienced. Although this method attempts to equitably distribute funds by prioritizing those counties which experienced a greater amount of harm, the method does not give GCRPC the flexibility to determine the actual needs of the populations of each of these counties and whether buyout/acquisition programs will meet those needs.⁸ GCRPC's allocation method would be more sensible and equitable if it were tasked with allocating funds for all housing programs. However, GCRPC only needs to allocate those funds intended for only the buyout and acquisition portion of the state housing programs. The allocation methodology should therefore be structured to identify which counties are most in need of buyout and acquisition funds

Establishing program criteria for buyouts would enable GCRPC to identify areas in the counties

³ FEMA defines "verified loss" as "the total dollar amount of IHP-eligible real or personal property items of average quality, size, and capacity, as verified by FEMA"; an ambiguous and circuitous definition to say the least. IAPP-G, 67.

⁴ <https://www.brookings.edu/blog/social-mobility-memos/2017/09/18/hurricanes-hit-the-poor-the-hardest/>

⁵ <http://files.kff.org/attachment/Report-An-Early-Assessment-of-Hurricane-Harveys-Impact-on-Vulnerable-Texans-in-the-Gulf>

⁶ HG 13.

⁷ Texas General Land Office, State Action Plan at 79.

⁸ GCRPC is required to allocate funds in a way that will satisfy "unmet needs." SAP at 79

that qualify for the buyout program based on need, prioritize those in its buyout fund allocation, and estimate the cost of a buyout program. GCRPC can then use its limited funds to target the areas that stand to benefit the most from acquisition.

Buyout program eligibility criteria should focus on achieving two goals: meeting the GLO's stated objectives of the buyout program, and meeting the national objective to support lower-income households. First, According to the GLO, buyouts serve to (1) provide resiliency over rebuilding in a floodplain; (2) prevent repetitive loss; and (3) end extreme risk to health and human safety.⁹ GCRPC should establish criteria for buyouts that target these three objectives. For example, it could require that areas targeted for buyouts (1) be in a floodplain; (2) demonstrate housing damage due to Hurricane Harvey, as well as from prior recent floods; and (3) the flooding from Hurricane Harvey caused an extreme risk to health and human safety in that area from flood waters reaching several feet.

Second, buyout programs should be designed to meet the national objective that 70% of all CDBG-DR funds benefit Low-to-Moderate Income (LMI) Households. To do this, GCRPC could set criteria that areas are only eligible for or receive priority for buyouts if at least 70% of the households targeted for a buyout are LMI. Such criteria would help CAPCOG identify those counties or cities in need of buyouts, as opposed to those in need of the individual homeownership programs available through the state.

3. The MOD should standardize the benefits provided in buyout programs

According to the State Action Plan, subrecipients are required to develop guidelines, regulations, maximum assistance levels, target areas, and additional eligibility requirements for program.¹⁰ The current MOD sets no standards for the benefits required in a buyout program. In its MOD, GCRPC should establish those program requirements that ensure individual households are provided with the assistance necessary to relocate to a comparable home, such as relocation assistance, down payment assistance, and relocation consultation services. These benefits should be available to all qualified persons, but can be denied to individuals who have already received similar assistance in order to avoid duplication of benefits.

Through standardization of benefits and services, GCRPC guarantees that residents in each county are treated in the same manner and avoids potential unintentional discriminatory impacts to residents depending on their county or city.

Conclusion

GCRPC has the opportunity to be on the forefront of disaster recovery planning. It has the opportunity to realize that there are communities within its region that have been ignored time and again after a storm and for whom the political will to mitigate the impacts of disasters does not exist. It has the opportunity to hear the voices of those impacted. By taking a more considerate and inclusive look at the damage caused by Hurricane Harvey, instead of using

⁹ SAP at 17.

¹⁰ SAP at 80. The Housing Guidelines include the COGs in its definition of "subrecipients". HG at 11.

FEMA's flawed methods, GCRPC will be able to impact these communities for the better for decades to come.

I am available for questions by email at hdyal@trla.org and phone at (361) 880-5423. Thank you for your consideration of these comments.

Respectfully Submitted,

Hannah Dyal

Staff Attorney
Texas RioGrande Legal Aid
3825 Agnes St.
Corpus Christi, TX 78405

michaela@gcrpc.org

From: Rick McBrayer <rmcbrayer@victoriatoem.org>
Sent: Tuesday, July 3, 2018 11:43 AM
To: Michael Ada (michaela@gcrpc.org)
Subject: State Action Plan

Follow Up Flag: Follow up
Flag Status: Completed

Michael,

Looking back through the State Action Plan (SAP) total Regional Allocation Budget for the GCRPC I noticed that we have the following listed:

City of Victoria, Victoria County, VISD, NISD, VC, and VEC....

However I don't see BISD, the water control districts, or the Port of Victoria, is there any explanation to this?

Thanks,

Rick McBrayer
Emergency Management Coordinator
Victoria Office of Emergency Management
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Victoria TX, 77901
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rmcbrayer@victoriatoem.org

Website: <http://www.vctx.org/index.php/en/county-departments?id=409>

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michaela@gcrpc.org

From: Rick McBrayer <rmcbrayer@victoriatoem.org>
Sent: Tuesday, July 3, 2018 1:39 PM
To: michaela@gcrpc.org
Subject: Re: State Action Plan

Thanks that's a perfect explanation.

Rick McBrayer
Emergency Management Coordinator
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On Jul 3, 2018, at 12:48 PM, "michaela@gcrpc.org" <michaela@gcrpc.org> wrote:

Hi Rick,

Entities with eminent domain authority within the region were compiled using the Texas Comptroller's Online Eminent Domain Database (COEDD).
<https://coedd.comptroller.texas.gov/>

Bloomington ISD, local water control districts, and The Port of Victoria are either 1) Non-compliant with Texas Government Code, Chapter 2206, Subchapter D, or 2) they do not have eminent domain authority.

The Comptroller's database only provides info on **compliant** entities.

Example: Quail Creek MUD is listed as having an Eminent Domain function with TCEQ; However, they are not included in the Comptroller's database.

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the Method of Distribution.

Let me know if this answers your question.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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