

September 13, 2023

Michael Ada, Executive Director Golden Crescent Regional Planning Commission 1908 N Laurent Street, Suite 600 A Victoria, TX 77901

Re: Golden Crescent Regional Planning Commission (GCRPC) Hurricane Harvey CDBG-DR Local Infrastructure Program MOD Amendment Approval

Mr. Ada:

The Texas General Land Office (GLO) Community Development and Revitalization division is approving the GCRPC Hurricane Harvey CDBG-DR Local Infrastructure Program Method of Distribution (MOD) Amendment. The amendment was initially submitted July 7, 2023, underwent review by GLO staff, was submitted a final time with corrections made on August 8, 2023. The below entities have been allocated funds in addition to their initial totals:

Entity	Initial Allocation	Reallocation Amount	Final Total Allocation
Victoria County	\$3,515,651	\$ 117,421.61	\$3,633,072.61
City of Victoria	\$6,056,722	\$ 175,300.55	\$6,232,022.55
Calhoun County -77979	\$3,704,301	\$ 140,585.14	\$3,844,886.14
Port Lavaca	\$5,113,395	\$ 133,754.70	\$5,247,149.70
Calhoun County	\$2,196,247	\$ 100,000.00	\$2,296,247
Seadrift	\$1,536,581	\$ 100,000.00	\$1,636,581
Goliad County	\$723,030	\$ 100,000.00	\$823,030
City of Goliad	\$477,108	\$ 100,000.00	\$577,108
Nixon	\$671,903	\$ 100,000.00	\$771,903
Jackson County	\$840,270	\$ 100,000.00	\$940,270
Edna	\$730,897	\$ 100,000.00	\$830,897
Total	\$25,566,105	\$ 1,267,062.00	\$26,833,167

Please note that only entities with active contracts may be supplemented with the reallocated funds will be able to utilize them due to the limitations of the approaching grant term expiration set by the US Department of Housing and Urban Development (HUD).

Acceptance of the MOD amendment does not indicate approval of any proposed reallocation recommendations. With this approval, entities receiving reallocated funds will receive additional information regarding the application process from the GLO. If you have any questions or require any additional information, please contact Alex Swift at alex.swift.glo@recovery.texas.gov

Sincerely,

Shawn Strange

Shawn Strange, Regulatory Policy & Mapping Director Community Development and Revitalization

Cc: Alexandra Gamble, Community Development and Revitalization Regulatory Policy Deputy Director



Council of Governments (COG) Method of Distribution Amendment 1 Hurricane Harvey CDBG-Disaster Recovery Local Infrastructure Program

Contact Information

Council of Governments: Golden Crescent Regional Planning Commission

Principal Contact Name, Title: Jenn Putman, Member Services Coordinator

Principal Contact Telephone: 361 – 578 – 1587 x312

Local Infrastructure Program COG MOD Amount:

\$1,267,062
\$1,207,002

Reallocation Amount:

HUD MID Total	n/a
State MID Total	n/a
Total Reallocation Amount	\$1,267,062

Local Infrastructure Program Method of Distribution Amendment Detail

The COG is required to prepare a method of distribution amendment for the Local Infrastructure Program funds between the eligible cities and counties. The GLO has directed the COG to use a direct allocation technique based on objective and verifiable data. The distribution should be based on, but not limited to, unmet need tied back to Hurricane Harvey damages.

Reallocation Summary

The following is a summary of the reallocation process of funds, including entities that have declined funds, entities that are receiving reallocated funds, and eligible activities.

GCRPC elected to reallocate funds to entities with measurable impacts from Hurricane Harvey to ensure funds address unmet need tied back to Hurricane Harvey damages and to achieve the floor allocation of \$100,000 per entity. DeWitt and Lavaca County declined funds from the original funding opportunity and were therefore ineligible to receive reallocated funds; no entities declined reallocated funds. GCRPC chose not to limit eligible activities, beyond what is already described by the GLO.

Entities receiving reallocated funds are:

- Victoria County
- City of Victoria
- Calhoun County zip code 77979 (excluding the City of Port Lavaca)
- City of Port Lavaca
- Calhoun County (excluding zip code 77979 Calhoun County, Point Comfort, and Seadrift)
- City of Seadrift
- Goliad County (excluding City of Goliad)
- City of Goliad
- City of Nixon
- Jackson County (excluding cities of Edna, Ganado, and La Ward)
- City of Edna

Reallocation Changes Table:

Attached is a table showing all jurisdictions that have had a change in allocation, including jurisdictions that have declined funds and the jurisdictions that have been reallocated those funds. All allocations must meet or exceed a floor of \$100,000 to help ensure sufficient funds for at least one eligible project.

Reallocation Table Page Number:	n/a
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Distribution Factors

Have the distribution factors been amended?

⊠ Yes	□ No	
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The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Population Total	25	2019 5-Year American Community Survey US Census Bureau/GLO	Standard population factors for funding distribution based on % of population in relation to total
			population of all eligible entities.
LMI Total	25	HUD	Disasters disproportionately affect LMI populations; this factor ensures recovery funds strengthen the resilience of LMI populations in

			accordance with state and federal priorities for this funding.
Flood Risk to Critical Infrastructure	20	First Street Foundation/NOAA	Specifically addresses risk to public facilities identified as critical infrastructure (e.g. utilities, airports, and emergency services) most likely to fall under eligible activities and most likely to increase community resilience through potential mitigation projects.
Unmet Need per Capita	15	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.	Factor was calculated to help represent the ability of a county, city, or ZIP code, population to sustain and/or recover from the disaster without federal or state support. 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 the unmet need amount (plus resiliency factor) developed by severity level by the population size.
FEMA Risk Assessment	15	FEMA applicant data	Data represents measured direct effects of Hurricane Harvey on each entity. Factor further ensures distribution of funds is aligned to both address the impacts of Hurricane Harvey, mitigate future risks, and increase entity resilience.

^{*}Add more rows if needed

Threshold Factors

(New Added Section)

If any, please describe threshold factors that were used to allocate funds.

Threshold Factor	Documentation Source	Explanation of Factor Selection
FEMA Damage	FEMA Damage Assessment data	Funds meant to help communities recover from
Assessment > 0	from Hurricane Harvey	Hurricane Harvey; allocation of funds depended on
		whether the community was affected and therefore
		could qualify its needs as recovery-related.

Eligible Activities

Have	e the e	eligible	activitie	es been	amended?
	Yes		No		

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 as amended.

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

The COG has addressed prioritization of eligible activities as follows:

\boxtimes	The COG has chosen not to limit Subrecipients in the region to projects meeting regional priority activities.						
	-OR-						
	The COG has limited Subrecipients in the region to activities:	sele	cting projects meeting the following regional priority				
	Water Facilities		Specially Authorized Public Facilities &				
			Improvements				
	Sewer Facilities		Public Services				
	Other Public Utilities (gas, et al)		Clearance & Demolition Activities				
	Street Improvements		Code Enforcement				
	Flood and Drainage Improvements		Senior Centers				
	Debris Removal		Economic Development				
	Community Centers & Emergency Shelters (Existing)		Parks, Playgrounds and other Recreational Facilities				
	Fire Protection Facilities and Equipment		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 and should be referenced accordingly.

Low- and Moderate-Income Requirement

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

GCRPC's MOD utilized a weighted allocation where each community's LMI population data carried 25 percent of the weight. Each allocation to an eligible entity is coupled with a 70 percent low-to-moderate income (LMI) requirement amount. Thus, each entity allocated funding is aware of the total amount of funding required to either benefit areas that are 70 percent or more LMI populations or populations with incomes below 80 percent of the Area Median Income (AMI). Each entity responsible for the management and administration of allocated funds is required to generate, maintain, and submit all evidence supporting a project's adherence to their 70 percent LMI requirement.

Citizen Participation

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

GCRPC engaged the public and local NGOs through the GCRPC website, public notices, and press releases. Community members and NGOs were encouraged to review the GCRPC MOD online or at scheduled public hearings. GCRPC accepted feedback online, in-person, and by mail; public comment period lasted 30 days, in accordance with MOD requirements. County and municipal governments, housing authorities, and other relevant stakeholders received direct notice. GCRPC distributed press releases to all area newspapers to give all communities the chance to share the opportunity and provided Spanish-language translations. All postings included information on how to submit a request for accommodations as well as alternative ways to participate—online, by mail, or in person—to enable the greatest amount of participation possible.

Public Hearing Information

Meeting Type	Public Planning Meeting	MOD Public Hearing
Date(s):	December 7 th , 2022	May 31 st , 2023
Location(s):	GCRPC	GCRPC
Total Attendance:	4	1

Citizen Participation Plan submitted Nov 2022 indicated GCRPC intended a 21 Dec 2022 Public Hearing; internal records indicate the hearing schedule was modified.

Direct Notice. As required, direct 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):

		Public Planning Meeting	MOD Public Hearing
Method		Date(s) Sent	Date(s) Sent
\boxtimes	Email	16 Nov 2022	23 May 2023
	Fax		
	Hand Delivery		
	Certified Mail		

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

Website Notice	Public Planning Meeting	MOD Public Hearing
Date(s)	16 Nov 2022	15 May 2023

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

Novyananau Nama	Public Planning Meeting	MOD Public Hearing				
Newspaper Name	Date Published	Date Published				
Gonzales Inquirer		2 June 2023				

Goliad Advance-		1 June 2023
Guard		
Port Lavaca Wave	23 November 2022	
Revista	November 2022	
Victoria Advocate	29 November 2022	

Public Comment Period

Provide the dates of the public comment period for the COG MOD Amendment.

Start Date:	15 May 2023	End Date:	15 June 2023	No. of Days:	31

Accommodations. Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for persons with Limited English Proficiency and for people with hearing impairments or other access and functional needs (ADA compliance).

All postings included information of	on how participants can	go about	accessing	accommodations.	All postings
also provided alternative means of 1	participating: in-person.	by mail.	and online.	,	

Postings were provided in Spanish and specifically submitted to Spanish-language publications.

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.

Approval and Signatory Authority

Attached is a Resolution from the COG 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.

1-1-1-1	08/04/2023
Signature	Date
Michael Ada	Executive Director
Printed Name	Title
michaela@gcrpc.org	361-578-1587 ext. 301
Email Address	Telephone Number

COG:

Total Allocation: \$1,267,062

Entity		Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage	
Victoria County	\$	117,421.61	9.27%	\$82,195.13	70.00%	
City of Victoria	\$	175,300.55	13.84%	\$122,710.38	70.00%	
Calhoun County Zip 77979						
(Excluding the City of Port	_			4		
Lavaca)	\$	140,585.14	11.10%	\$98,409.60	70.00%	
City of Port Lavaca	\$	133,754.70	10.56%	\$93,628.29	70.00%	
Calhoun County (Excluding Zip						
77979 Calhoun County, Point Comfort, and Seadrift)	\$	100,000.00	7.89%	\$70,000.00	70.00%	
	7	100,000.00	7.0370	\$70,000.00	70.0070	
Seadrift city	\$	100,000.00	7.89%	\$70,000.00	70.00%	
·	7	100,000.00	7.1667,0	<i>47 6)666.66</i>	7 0.0075	
Goliad County (Excluding City of Goliad)						
Gonady	\$	100,000.00	7.89%	\$70,000.00	70.00%	
Goliad city	\$	100,000.00	7.89%	\$70,000.00	70.00%	
Nixon city	\$	100,000.00	7.89%	\$70,000.00	70.00%	
Jackson County (Excluding City of						
Edna, City of Ganado, and City of	_			4		
La Ward)	\$	100,000.00	7.89%	\$70,000.00	70.00%	
Edna city	\$	100,000.00	7.89%	\$70,000.00	70.00%	
Total	\$:	1,267,062.00	100.00%	\$ 886,943.40	70.00%	

DR-MOD (Harvey Infrastructure)

GCRPC | DR-MOD | Page 2

Total Allocation: \$ 1,267,062.00

	7		-,-	77,002.00	_																									
		Populat	ion Tota	I		LMI	Total		FI	ood Risk	to Critic	cal	Un	met Need	l per Ca	pita	FEI	MA Risk	Assessm	ent										
	Fa	ctor Weight:	25		F	actor Weight:	25		Fa	actor Weight:	20		F	actor Weight: 1	15		F	Factor Weight: 15		Factor Weight: 15		Factor Weight: 15		Factor Weight: 15		1	Proportional			
City or County	Factor Measure (FM)	Measure Maximum (EMmax)	Weight (W)	Weighted Factor	Factor Measure (FM)	Measure Maximum (EMmax)	Weight (W)	Weighted Factor	Factor Measure (FM)	Measure Maximum (EMmax)	Weight (W)	Weighted Factor	Factor Measure (FM)	Measure Maximum (EMmax)	Weight (W)	Weighted Factor	Factor Measure (FM)	Measure Maximum (EMmax)	Weight (W)	Weighted Factor	Entity Weighted Factor Total (EWFtot)	Weighted Factor (PWF) EWFtot/WFtot	Proportional Distribution PWF X AFD	Floor	Final Allocation					
Victoria County	25,054	67,055	25	9.34	7,425	26,730	25	6.94	24.56%	100%	20	4.91	12.93%	37.07%	15	5.23	33	35	15	14.14	40.57	0.13	\$ 162,377.77	\$ -	\$ 117,421.61					
City of Victoria	67,055	67,055	25	25.00	26,730	26,730	25	25.00	5.26%	100%	20	1.05	12.93%	37.07%	15	5.23	10	35	15	4.29	60.57	0.19	\$ 242,416.30	\$ -	\$ 175,300.55					
Calhoun County Zip 77979 (Excluding the City of Port Lavaca)	4,522	67,055	25	1.69	1,255	26,730	25	1.17	78.57%	100%	20	15.71	37.07%	37.07%	15	15.00	35	35	15	15.00	48.57	0.15	\$ 194,409.72	\$ -	\$ 140,585.14					
City of Port Lavaca	12,147	67,055	25	4.53	5,875	26,730	25	5.49	95.24%	100%	20	19.05	37.07%	37.07%	15	15.00	5	35	15	2.14	46.21	0.15	\$ 184,964.16	\$ -	\$ 133,754.70					
Calhoun County (Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)	3,122	67,055	25	1.16	5 760	26,730	25	0.71	88.37%	100%	20	17.67	21.32%	37.07%	15	8.62	10	35	15	4.29	32.46	0.10	\$ 129,914.58	\$ 100,000.00	\$ 100,000.00					
Seadrift city	1,181	67,055	25	0.44	870	26,730	25	0.81	100.00%	100%	20	20.00	21.32%	37.07%	15	8.62	10	35	15	4.29	34.16	0.11	\$ 136,737.78	\$ 100,000.00	\$ 100,000.00					
Goliad County (Excluding City of Goliad)	5,005	67,055	25	1.87	7 1,915	26,730	25	1.79	12.50%	100%	20	2.50	2.28%	37.07%	15	0.92	2	35	15	0.86	7.94	0.03	\$ 31,758.95	\$ 100,000.00	\$ 100,000.00					
Goliad city	2,300	67,055	25	0.86	685	26,730	25	0.64	0.00%	100%	20	0.00	2.28%	37.07%	15	0.92	1	35	15	0.43	2.85	0.01	\$ 11,397.18	\$ 100,000.00	\$ 100,000.00					
Nixon city	2,510	67,055	25	0.94	1,325	26,730	25	1.24	33.33%	100%	20	6.67	1.29%	37.07%	15	0.52	1	35	15	0.43	9.79	0.03	\$ 39,189.64	\$ 100,000.00	\$ 100,000.00					
City of Edna, City of Ganado, and City of La	6,608	67,055	25	2.46	1,890	26,730	25	1.77	45.83%	100%	20	9.17	2.70%	37.07%	15	1.09	2	35	15	0.86	15.35	0.05	\$ 61,434.21	\$ 100,000.00	\$ 100,000.00					
Edna city	5,767	67,055	25	2.15	2,600	26,730	25	2.43	60.00%	100%	20	12.00	2.70%	37.07%	15	1.09	1	35	15	0.43	18.10	0.06	, , , ,	\$ 100,000.00						
																				Total:	316.58	1.00	\$ 1,267,062.00	\$ 700,000.00	\$ 1,267,062.00					



A Resolution

of the Board of Directors to adopt the CDBG- Disaster Recovery Local Infrastructure Program Method of Distribution of \$1,267,062,

WHEREAS, the Golden Crescent Regional Planning Commission entered into an agreement with the Texas General Land Office as amended on March 31, 2021, to create a method of distribution for \$1,267,062 of Community Development Block Grant – Disaster Recovery Local Infrastructure Program (CDBG-DR) funding; and

WHEREAS, the Golden Crescent Regional Planning Commission held a public meeting on June 28th, 2023 where the Board of Directors approved a final method of distribution for CDBG-MIT program funding based on an approved process; and

WHEREAS, the Golden Crescent Regional Planning Commission finds it in the best interest of the citizens of the Golden Crescent region that Golden Crescent Regional Planning Commission's CDBG-DR Method of Distribution be approved to allocate funds to the region's counties and municipalities for the funding of disaster recovery projects; and

Now, therefore, be it resolved by the Golden Crescent Regional Planning Commission;

- 1. That Golden Crescent Regional Planning Commission's CDBG-DR Method of Distribution is correct, true, and through the approved process, received final approval from the Texas General Land Office;
- 2. That the Golden Crescent Regional Planning Commission's CDBG-DR Method of Distribution meets the requirements issued by the Texas General Land Office for inclusion in the State Mitigation Action Plan, as amended;
- 3. That the attached document outlines Golden Crescent Regional Planning Commission's CDBG-DR Method of Distribution for \$1,267,062 for the Golden Crescent Region; and
- 4. That this Resolution is effective upon its adoption.

Passed and approved by the Board of Directors for the Golden Crescent Regional Planning Commission in Victoria, Texas, on this the 28th day of June 2023.

Councilman Tony Allen

Board President

ATTEST:

Alderwoman Robin Alaniz Board Secretary-Treasurer

GOLDEN CRESCENT REGIONAL PLANNING COMMISSION

Public Planning Meeting for Reallocation of
Texas Community Development Block Grant
Disaster Recovery Funds for Local Infrastructure Projects
Method of Distribution Amendment
December 7, 2022
6:00 PM - 6:30 PM

In-Person

1908 N. Laurent St., Suite 600 Board Room Victoria, Texas 77901

REMOTE ACCESS

Join on your computer, mobile app or room device

Click here to join the meeting Meeting ID: 225 105 139 02

Passcode: WLiVRC

Download Teams | Join on the web

Or call in (audio only)

+1 806-503-5127,,341579138# United States,

Lubbock

Phone Conference ID: 341 579 138#

MINUTES

In Attendance:

GCRPC Staff: Michael Ada, Hannah Crone,

and Rebecca Spears

Rick Villa

David Spears

Mayor Katherine Payne, Nordheim

Gentleman from Nordheim, unnamed

Online:

Katy Connally

Jill Phinney

Robin Knipling

Councilman Craig Hughes

Shannon Longoria

AGENDA

- 1. Call Meeting to Order 6:05pm
- 2. Welcome & Introductions

Hannah Crone called the meeting to order.

Pursuant to VTCA, Texas Government Code, Section 551.041 NOTICE OF MEETING OF THE

3. Project Details

Ms. Crone described source and purpose of funding.

4. Eligibility

DeWitt and Lavaca counties declined initial allocation and were therefore ineligible for reallocation.

5. MOD Development Process

Ms. Crone walked attendees through the DR-MOD process.

6. MOD Amendment Requirements

Ms. Crone described guidance from the GLO for GCRPC's MOD development: objective, local prioritization; minimum \$100k allocation, minimum percentage must be LMI; two public hearings required.

7. Public Comment Summary

Shared public comment avenues: Mail, email, or in-person.

8. Open Forum/Public Comments

No comments/questions online. Gentleman on behalf of Victoria County Long-term Recovery Group inquired about use of funds for organization's facilities; Ms. Crone explained that organizations may partner with the city or county to use funds. Gentleman's follow-up question requested information on use of funds to help residents directly, through nonprofit organization; Ms. Crone clarified that a nonprofit entity was not eligible for this funding opportunity.

9. Adjournment 6:22pm





Public Comment Hearing for DR MOD 5/31/2023: Minutes

Meeting Begins at 5:10

Michael Ada introduced Jennifer Putman. Jennifer Putman provided an overview of the changes based on the GLO (General Land Office) not accepting the original data. The GLO wanted GCRPC to use data that is more closely aligned to Hurricane Harvey. The new distribution factors caused a shift coastward in allocations. Floor opened for comment.

Clinton Tegeler – Ganado is no longer on the distribution list.

Michael Ada - Unfortunately, due to the nature of the MOD factors some entities were considered ineligible such as Jackson County.

Clinton Tegeler – What were the factors?

Michael Ada - The cause rejected original factors does not apply to Jackson it was population as it did not meet the minimum threshold for funds, he requests for a redo. He then makes a clarification that the funds are wide open on what the funds can be used for.

Josephine Soliz - Do we have to submit a request to the GLO?

Michael Ada - Yes.

Josephine Soliz - Do smaller amounts take less time?

Michael Ada- Unsure but from what we have seen the answer seems to be no.

Michael Ada - What they sent back is what they sent us. The FEMA data set that we originally used was a generalized dataset to capture vulnerability in general, but the new dataset is specifically related to Hurricane Harvey which because of that new dataset had to be added.

Clinton Tegeler - The county is getting the equal amount as the highest town why not get the two highest population centers rather than the county and the city?

Michael Ada - It was a balance to not exclude anyone and get a good mix of counties and municipalities. There isn't enough to go around.

Clinton Tegeler - No one here from the county yet they get some funds.

Michael Ada- we had to pull back on eligible municipalities due to limited funds.

Clinton Tegeler - Is it allowable to require different factors? Is there a threshold moneywise?

Michael Ada – Yes, \$100,000.

Lindsey Mikulenka confirmed there were no further public comments during the public comment period and emphasized that entities can make comments via email or traditional mail until the 15th of June.

Michael and Jennifer will get an official response on the previous factors as to why entities such as Ganado (Mayor Tegeler) were excluded from the calculation in the MOD.

Meeting ends at 5:24

5/31/2023	In-Person	Tegeler, Clinton	Mayor		GCRPC utilized limitation factors to ensure all funding was distributed to entities affected by Hurricane Harvey, with FEMA Damage Assessments >0.
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