October 3, 2018

Diane Rath
Executive Director
Alamo Area Council of Governments
8700 Tesoro Dr, Ste 160
San Antonio, TX 78217

Re: Alamo Area Council of Governments Method of Distribution (MOD) — 2017 Hurricane Harvey CDBG-DR Funds

Dear Ms Rath:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has completed its review of materials submitted in support of Alamo Area Council of Governments’ (AACOG) 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 AACOG’s MOD submitted on July 15, 2018, with supplemental material submitted on August 6, 2018, is approved.

GLO-CDR approves AACOG’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. AACOG’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.
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: Stella Garcia, Senior Director of Operations, AACOG
    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
Council of Government (COG) Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information
Contact Information
Council of Government (COG): Alamo Area Council of Governments
Principal Contact Name, Title: Stella E. Garcia, Sr. Director of Operations
Principal Contact Telephone: 210-362-5252
Principal Contact Email: Sgarcia1@aacog.com
Principal Contact Address: 8700 Tesoro Drive, Suite 160
City, State, Zip: San Antonio, Texas 78230

Allocation Summary
COG Allocation for All Programs: $5,682,165
Local Buyout and Acquisition Program Total: $4,152,165
Local Infrastructure Program Total: $1,530,000

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:

The Alamo Area Council of Governments held two public meetings. The first was a Public Planning meeting held in Karnes City at the Karnes County Courthouse Annex on Monday, June 18, 2018, at 10:00 am. Prior to this meeting, AACOG staff visited with communities within the three affected counties of Comal, Guadalupe, and Karnes County to inform them of the development of the Method of Distribution for the Housing Buyout and Acquisition Program and the Local Infrastructure Program as well as sending out email notices to housing and other non-governmental organizations. The PowerPoint presentation presented during the Public Planning Meeting and draft allocation were presented to the AACOG Board of Directors on June 27, 2018, at 10:00 am for review and approval. The draft allocation was posted for public comment on Wednesday, June 27, 2018 by 3:00 pm on the AACOG website for 14 calendar days. A Public Hearing was held on Friday, July 6, 2018, at 10:00 am at the Seguin Event Center in Seguin, Texas.
First Public Hearing Information

Date/Time: June 18, 2018/10:00 am  Location: Karnes County Courthouse Annex, Karnes City, Texas
Attendance: 11  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):

<table>
<thead>
<tr>
<th>Method</th>
<th>Date Sent</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Mail</td>
<td>June 5, 2018</td>
<td>Emailed affected communities to schedule a meeting with them on the process for the MOD and what it means for their communities;</td>
</tr>
<tr>
<td></td>
<td>June 6, 2018</td>
<td></td>
</tr>
<tr>
<td></td>
<td>June 13, 2018</td>
<td></td>
</tr>
<tr>
<td>Fax</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand Delivery</td>
<td>June 7, 2018</td>
<td>held one on one meetings with various communities and provided copy of the Public Notice for posting at their local offices; city of Seguin; New Braunfels/Comal County, Guadalupe County, Karnes County/Karnes City, Karnes County Housing Authority</td>
</tr>
<tr>
<td></td>
<td>June 12, 2018</td>
<td></td>
</tr>
<tr>
<td></td>
<td>June 13, 2018</td>
<td></td>
</tr>
<tr>
<td></td>
<td>June 14, 2018</td>
<td></td>
</tr>
<tr>
<td>Certified Mail</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Method</th>
<th>Date Published</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>COG Website</td>
<td>June 13, 2018</td>
<td><a href="http://www.aacog.com">www.aacog.com</a> Screenshot of webpage</td>
</tr>
</tbody>
</table>

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):

<table>
<thead>
<tr>
<th>Newspaper Name</th>
<th>Date Published</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA Express News</td>
<td>June 17, 2018</td>
<td>Affidavit</td>
</tr>
<tr>
<td>Seguin Gazette</td>
<td>June 13, 2018</td>
<td>Actual Newspaper</td>
</tr>
<tr>
<td>New Braunfels Herald-Zeitung</td>
<td>June 14, 2018</td>
<td>Affidavit</td>
</tr>
<tr>
<td>Karnes Countywide</td>
<td>June 13, 2018</td>
<td>Affidavit</td>
</tr>
</tbody>
</table>

Citizen Comment Documentation

- The required copy of a sign-in sheet from the public hearing is attached.
- 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).  Posting included information on how to request accommodations; meeting facility was accessible.

None were requested
Second Public Hearing Information

Date/Time: July 6, 2018/10:00 am Location: Seguin Event Center, Seguin, Texas
Attendance: 4

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):

<table>
<thead>
<tr>
<th>Method</th>
<th>Date Sent</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Mail</td>
<td>June 27, 2018, July 3, 2018 (reminder)</td>
<td>Email to affected communities as well as Guadalupe Blanco River Authority</td>
</tr>
<tr>
<td>Fax</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand Delivery</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Certified Mail</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Method</th>
<th>Date Published</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>COG Website</td>
<td>06/26/2018</td>
<td><a href="http://www.aacog.com">www.aacog.com</a> (screen shot of webpage)</td>
</tr>
</tbody>
</table>

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):

<table>
<thead>
<tr>
<th>Newspaper Name</th>
<th>Date Published</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA Express News</td>
<td>July 4, 2018</td>
<td>Pending affidavit</td>
</tr>
<tr>
<td>Seguin Gazette</td>
<td>June 27, 2018, July 4, 2018</td>
<td>Pending affidavit</td>
</tr>
<tr>
<td>New Braunfels Herald-Zeitung</td>
<td>June 27, 2018, July 4, 2018</td>
<td>Pending affidavit</td>
</tr>
</tbody>
</table>

Citizen Comment Documentation

- The required copy of a sign-in sheet from the public hearing is attached.
- 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.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Posting information included directions on how to request accommodations. Meeting facility was accessible</td>
<td></td>
</tr>
<tr>
<td>None requested</td>
<td></td>
</tr>
</tbody>
</table>
Long-Term Planning and Recovery
Below is an explanation of how the COG’s method of distribution fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing and the local economy and primarily, how these activities will contribute to the long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

The three affected counties, Comal, Guadalupe and Karnes County were not included as “most impacted” by HUD in the General Land Office’s Action Plan. However, over 412 residents from communities in Karnes County (the smallest of the three counties) indicated some sort of damage based on the number of FEMA Individual Assistance and Small Business Administration (SBA) loan applications more than Comal and Guadalupe County combined. The Housing Acquisition and Buyout Program method of distribution gives Karnes County the greatest allocation of $1,725,606 based on the number of households with reported damage. The other two counties did not have the same level of damage reported but has been included in three weather federal disaster declarations since 2015 and have homes that have had repetitive damage. Each county (as lead) will have an opportunity to acquire or buy damaged properties in their respective communities to promote long-term planning and recovery in their communities for mitigation of future events.

The impacted communities will have the opportunity to buy out or acquire homes prone to weather events to move families, especially the hardest to serve low and moderate income families, out of harm’s way proactively before future weather events. In addition, communities will be able to address drainage concerns and fortify facilities (i.e., roofs) that had damage exacerbated by Harvey. Infrastructure investments may also support hazard mitigation plans which address not only long range planning but more importantly recovery.

In addition, AACOG has hired a part-time Regional Disaster Recovery Coordinator who will work primarily out of Karnes County to assist the communities with long term planning and recovery and related applications for related funding.

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.

In accordance with the FEMA Individual Assistance reports there were some homes in Karnes County that did report damage but were not fully compensated by FEMA for the reported loss. Residents of Comal and Guadalupe Counties were not eligible for FEMA individual assistance short term recovery funds; these counties were only eligible for public assistance funds. However, residents from these counties did report damage related to Harvey.

The funds will be allocated at the county level to address unmet housing with Karnes County receiving the largest allocation based on their proportion of related damage reports (as stated above).
Affirmatively Furthering Fair Housing Statement
All subrecipients will certify that they will affirmatively further fair housing ("AFFH") in their grant agreements, and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval of projects. Such review will include assessment of a proposed project’s area demography, socioeconomic characteristics, housing configuration and needs, educational, transportation, and health care opportunities, environmental hazards or concerns, and all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

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

Using the Excel Spreadsheet provided to us by the General Land Office (GLO), the 70% Low to Moderate Income (LMI) threshold was listed and was stressed during the Public Planning Meeting and Public Hearing as well as all one on one meetings held with eligible entities. $3,977,516 of the $5,682,165 allocation must benefit LMI and are allocated accordingly.

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

Distribution Factors
The COG has selected the following distribution factors:

<table>
<thead>
<tr>
<th>Distribution Factor*</th>
<th>Weight</th>
<th>Documentation Source</th>
<th>Explanation of Factor Selection and Weighting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Damage Reports</td>
<td>50</td>
<td>FEMA Individual Assistance applications and SBA loan</td>
<td>Residents who filed a claim for damages incurred from Hurricane Harvey is an indicator of the level</td>
</tr>
<tr>
<td>Population</td>
<td>25</td>
<td>Census Data</td>
<td>Proportionately allocates the available funding</td>
</tr>
<tr>
<td>------------</td>
<td>----</td>
<td>-------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Disasters since 2015</td>
<td>25</td>
<td>Federal Disaster Declarations</td>
<td>Indicates repetitive loss for communities in the last 3 years and their vulnerability</td>
</tr>
</tbody>
</table>

*Add more rows if needed

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

**Eligible Activities**

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

The COG has addressed prioritization of eligible activities as follows:

- **The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.**

- **OR**

- **The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:**
  - Buyout
  - Acquisition
  - Relocation Assistance with buyout or acquisition activities
  - Demolition only
  - Activities designed to relocate families outside of floodplains
  - Public service within the 15 percent cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services)
  - FEMA Hazard Mitigation Grant Program (HMGP) cost share

**Ineligible Activities**

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

**Local Infrastructure Program Method of Distribution Detail**

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

**Distribution Factors**

The COG has selected the following distribution factors:

<table>
<thead>
<tr>
<th>Distribution Factor*</th>
<th>Weight</th>
<th>Documentation Source</th>
<th>Explanation of Factor Selection and Weighting</th>
</tr>
</thead>
</table>

Page 6 of 8
Damage Reports | 50 | FEMA Public Assistance applications from communities in the Harvey disaster declaration | Communities who filed a claim for damages incurred from Hurricane Harvey is an indicator of the level of damage received by the communities

Population | 25 | Census Data | Proportionately allocates the available funding

Disasters since 2015 | 25 | Federal Disaster Declarations | Indicates repetitive loss for communities in the last 3 years and their vulnerability

*Add more rows if needed

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

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

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

The COG has addressed prioritization of eligible activities as follows:

- The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.

-OR-

☐ The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:

☐ Water Facilities
☐ Sewer Facilities
☐ Other Public Utilities (gas, etc)
☐ Street Improvements
☐ Flood and Drainage Improvements
☐ Debris Removal
☐ Community Centers & Emergency Shelters (Existing)
☐ Fire Protection Facilities and Equipment

☐ Specially Authorized Public Facilities & Improvements
☐ Public Services
☐ Clearance & Demolition Activities
☐ Code Enforcement
☐ Senior Centers
☐ Economic Development
☐ Parks, Playgrounds and other Recreational Facilities
☐ 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 COG is attached approving the method of distribution and authorizing its submittal to the Texas General Land Office. I certify that the contents of this document and all related attachments are complete and accurate.

signature

Date

Diane D. Rath
Printed Name

Executive Director
Title

drath@aacog.com
Email Address

210-362-5201
Telephone Number
Resolution
A RESOLUTION TO APPROVE THE METHOD OF DISTRIBUTION FOR THE
ALLOCATION OF HURRICANE HARVEY DISASTER RECOVERY FUNDING

WHEREAS, the Alamo Area Council of Governments (AACOG) which was
established in 1967 under Chapter 391 of the Local Government Code as a voluntary
association of local governments and organizations that serves its members through
planning, information, and coordination activities and serves the Alamo Area/State
Planning Region 18, which covers 13 counties and 12,582 square miles comprising of
Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr,
Medina, McMullen, and Wilson counties; and

WHEREAS, on February 9, 2018 the US Department of Housing and Urban
Development (HUD) announced the allocation of $5.024 billion dollars in disaster
recovery assistance to the State of Texas; and

WHEREAS, the Texas General Land Office (GLO) developed an Action Plan
approved by HUD on June 25, 2018, which allocated funds to local governments for
the local residential buyout/acquisition and local infrastructure programs through
Methods of Distributions (MODs) developed by the COGs, of which, $4,152,165 was
allocated for the local buyout/acquisition program and $1,530,000 was allocated for
the infrastructure program to Comal, Guadalupe, and Karnes Counties in the AACOG
region; and

WHEREAS, on June 18th and July 6th 2018, the AACOG conducted two public
meetings and established the Method of Distribution of disaster recovery assistance
to eligible local governments within the AACOG region.

NOW THEREFORE, BE IT RESOLVED by the Alamo Area Council of Governments:

1. That the Alamo Area Council of Government accepts and approves the
   Method of Distribution (MOD) for Hurricane Harvey – Round 1.

2. That the Alamo Area Council of Government reviewed and accepts into the
   MOD, the comments made during the public meetings and public comment
   period.

3. That this Resolution shall become effective immediately upon adoption.

Passed and approved this 26th day of September, 2018.

Chris Schuchart, Chairman
AACOG Board of Directors and
Judge, Medina County

Diane Rath, Executive Director
AACOG
Allocation Summary Spreadsheet
### Hurricane Harvey
#### Regional Method of Distribution Allocation Summary

<table>
<thead>
<tr>
<th>City, County or Eligible Entity</th>
<th>Allocation</th>
<th>Percentage of Allocation</th>
<th>Percentage of Total Regional Allocation</th>
<th>Total Allocation</th>
<th>Percentage of Total Regional Allocation</th>
<th>70% Low-to-Moderate Income Benefit Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comal County</td>
<td>$1,015,805</td>
<td>24.46%</td>
<td>11.42%</td>
<td>$1,190,553</td>
<td>20.95%</td>
<td>$833,387</td>
</tr>
<tr>
<td>New Braunfels</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$372,103</td>
<td>6.55%</td>
<td>$260,472</td>
</tr>
<tr>
<td>Bulverde/Spring Branch</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$61,928</td>
<td>1.08%</td>
<td>$43,070</td>
</tr>
<tr>
<td>Guadalupe County</td>
<td>$1,430,753</td>
<td>33.98%</td>
<td>14.78%</td>
<td>$1,636,933</td>
<td>28.81%</td>
<td>$1,145,853</td>
</tr>
<tr>
<td>Seguin</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$226,348</td>
<td>3.98%</td>
<td>$158,444</td>
</tr>
<tr>
<td>Schertz</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$103,801</td>
<td>1.83%</td>
<td>$72,661</td>
</tr>
<tr>
<td>Marion</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$56,593</td>
<td>1.00%</td>
<td>$39,615</td>
</tr>
<tr>
<td>McQueeney</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$58,322</td>
<td>1.03%</td>
<td>$40,832</td>
</tr>
<tr>
<td>Lake Dunlap</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$91,592</td>
<td>1.61%</td>
<td>$64,114</td>
</tr>
<tr>
<td>Karnes County</td>
<td>$1,725,606</td>
<td>41.56%</td>
<td>4.85%</td>
<td>$1,799,783</td>
<td>31.67%</td>
<td>$1,259,848</td>
</tr>
<tr>
<td>Karnes City</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$33,745</td>
<td>0.59%</td>
<td>$23,622</td>
</tr>
<tr>
<td>Kenedy</td>
<td>$0</td>
<td>0.00%</td>
<td>0.00%</td>
<td>$50,853</td>
<td>0.89%</td>
<td>$35,597</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>$4,152,164</td>
<td>100.00%</td>
<td>100.00%</td>
<td>$5,682,164</td>
<td>100.00%</td>
<td><strong>$3,977,155</strong></td>
</tr>
</tbody>
</table>

Percentage of Total Allocation: 73.07%  26.93%
Low-to-Moderate Income Benefit Requirement: 70%

**Final Allocations are based on minimum rule of $100,000 for Infrastructure grants; therefore the communities highlighted above with less than $100,000 will be rolled into the county's allocation.**

Bulverde/Spring Branch: 61,528
Comal County: 174,748
Revised Comal County Allocation: 236,276
Marion: 56,593
McQueeney: 58,332
Lake Dunlap: 91,592
Guadalupe County: 226,180
Revised Guadalupe County Allocation: 432,697
Karnes City: 33,745
Kenedy: 50,853
Karnes County: 74,177
Revised Karnes County Allocation: 158,775
# Buyout Acquisition Allocation
## Alamo Area Council of Governments

<table>
<thead>
<tr>
<th>City, County or Eligible Entity</th>
<th>SUM of Factors</th>
<th>SUM of Factors</th>
<th>SUM of Factors</th>
<th>Factor Measure (FM)</th>
<th>Weight (W)</th>
<th>Proportion of Weight W(FM/SUM)</th>
<th>Factor Measure (FM)</th>
<th>Weight (W)</th>
<th>Proportion of Weight W(FM/SUM)</th>
<th>Proportion of Weight W(FM/SUM)</th>
<th>Proportional Weighted Factor (PWF)</th>
<th>Proportional Distribution for Formulaic Distribution (AFD)</th>
<th>Proportional Distribution for Formulaic Distribution (PWF x AFD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comal County</td>
<td>29</td>
<td>50%</td>
<td>0.03</td>
<td>141,009</td>
<td>25%</td>
<td>0.11</td>
<td>3</td>
<td>25%</td>
<td>0.11</td>
<td>24%</td>
<td>4,152,165</td>
<td>$1,015,805</td>
<td></td>
</tr>
<tr>
<td>Guadalupe County</td>
<td>119</td>
<td>50%</td>
<td>0.11</td>
<td>159,659</td>
<td>25%</td>
<td>0.13</td>
<td>3</td>
<td>25%</td>
<td>0.11</td>
<td>34%</td>
<td>4,152,165</td>
<td>$1,410,753</td>
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</table>
# Local Infrastructure Allocation

**Alamo Area Council of Governments**

## SUM of Factors:

<table>
<thead>
<tr>
<th>City or County</th>
<th>Factor Measure (FM)</th>
<th>Weight (W)</th>
<th>Proportion of Weight W(FM/SUM)</th>
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Citizen Participation Plan
Citizen Participation Plan
COG Method of Distribution
Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information
Contact Information
Council of Government (COG): Alamo Area Council of Governments (AACOG)
Principle Contact Name, Title: Stella E. Garcia, Sr. Director of Operations
Principle Contact Telephone: 210-362-5252
Principle Contact Email: Sgarcia1@aacog.com
Principle Contact Address: 8700 Tesoro Drive, Suite 100
City, State, Zip: San Antonio, Texas 78217

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:

Citizens will be encouraged, through the AACOG website (www.aacog.com), public notices, flyers, and the Method of Distribution (MOD) prepared for public review to submit their views and comments regarding housing and community development (infrastructure) needs resulting from Hurricane Harvey. Citizens will be instructed to submit their comments in writing to AACOG via written letter, email to disaster_recovery@aacog.com, or in person by attending a scheduled public hearing.
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:

4 Housing Authorities in Karnes County: Falls City HA, Karnes City HA, Kenedy HA, and Runge HA; the city and county administrators/elected officials of Karnes County, Falls City, Karnes City, Kenedy, and Runge; the Karnes City and Kenedy Chambers of Commerce (small business membership organizations; they do not have economic development organizations; and the Karnes City Health and Human Services Department.

2 Housing Authorities in Comal County: New Braunfels HA and Schertz HA; city and county administrators/elected officials of Comal County, New Braunfels, Canyon Lake, Bulverde, Garden Ridge, and Schertz. Texas Health and Human Services located in New Braunfels and economic development corporations of Bulverde, New Braunfels, Comal County, and Schertz.

1 Housing Authority in Guadalupe County: Seguin HA; the city/county administrators and elected officials of Guadalupe County, Seguin, Kingsbury, Geronimo, and Marion. The economic development corporations of Seguin and Cibolo. Texas Health and Human Services office in Seguin, Texas.

Community Council of South Central Texas, Local Media, churches and school districts will also be notified in all 3 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:

Besides receiving notice of the public meetings, the following organizations will be contacted: National Association of Latino Community Asset Builders (NALCAB), San Antonio Branch NAACP, LULAC Seguin (#682 District 2), LULAC New Braunfels (#4217, District 2), Texas Rural Legal Aid, Mexican American Legal Defense and Education Fund (MALDEF) Southwest Regional Office (located in San Antonio) to request a meeting to seek input from them on how the people they represent in Karnes, Comal, and Guadalupe were affected by the disaster and to brief them on the available resources.

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. Notices will be posted in The Karnes Countywide publication (https://www.mysoutex.com/karnes_countywide/), the New Braunfels Herald-Zeitung (http://herald-zeitung.com/), Seguin Gazette (http://seguingazette.com/news/), and San Antonio Express News (https://www.mysanantonio.com/). All of these publications are available in paper and digitally. La Prensa (https://laprensasa.com/), a Spanish publication, and Seguin Daily News (http://www.seguintoday.com/) are only available digitally and public notices will be posted on those websites as well.

In addition, notices will also be published on the AACOG website and on the city/county websites of the impacted incorporated communities (Karnes County, Karnes City, Runge, Kenedy; Comal County, New Braunfels, Schertz; Guadalupe County, Seguin, Cibolo, and Kingsbury) and GLO website. If the community does not have an updated website, public notices will also be posted in the communities public building, such as court house, city office, library.

AACOG will also email the notices in English and Spanish to its extensive email distribution lists.

AACOG will also share notices on its FaceBook and Twitter pages.

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.

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: June 27, 2018/1:00 pm  Website Address: www.aacog.com

Public Hearings Scheduling Information
Public Planning Meeting – 1st Public Hearing
Date/Time: June 18, 2018 at 10:00 am  Location: Karnes County Courthouse Annex in Karnes City

2nd Public Hearing During Comment Period
Date/Time: July 6, 2018 at 10:00 am  Location: Seguin Event Center (Gudalupe County)

Notification consistent with GLO requirements will be provided on or before the following dates:
Dates Personal Notice of Hearings will be sent to entities: June 6, 2018
Dates Notice of Hearings will be published on the COG's Website:
June 6, 2018

Dates Notice of Hearings will be published in regional newspaper(s):
June 13, 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:

- All venues for the public planning meeting and public hearings will also be accessible to individuals with disabilities.
- If a sign language interpreter is needed, instruction will be provided on the public notice to contact AACOG 72 hours in advance of the meeting to arrange for a sign language interpreter.

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 AACOG’s public meetings, 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:
While we are only required to hold two public meetings, we have discussed having a 3rd meeting (2nd public hearing) during the 2nd week of July (on or before July 10th) in Comal County.

The MOD will be posted to the AACOG website and available at our office in San Antonio for public review. We will also ask our impacted counties/cities to post the MOD on their public websites and make a copy of the MOD available for review in their local offices as well.

AACOG is also creating a custom email address: disaster_recovery@aacog.com to receive comments from the public.
Meeting #1 Materials
Method of Distribution (MOD)  
Community Development Block Grant  
Disaster Recovery (CDBG DR) Funds

Public Planning Meeting  
Karnes County

presented by  
Stella E. Garcia, PhD  
Sr. Director of Operations  
Alamo Area Council of Governments (AACOG)

June 18, 2018 at 10:00 am

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Purpose and Role

Purpose: Public Planning Meeting to gain input on factors for developing a Method of Distribution (MOD)

Roles:

- Alamo Area Council of Governments (AACOG) is facilitating the meeting and will be developing the MOD to submit to GLO
- General Land Office (GLO) will administer the programs in the Action Plan
General Land Office (GLO)
Action Plan

- US Housing and Urban Development (HUD) allocated $5.024 billion to Texas in response to Hurricane Harvey, DR-4332
- General Land Office (GLO) has been designated by the governor to administer CDBG DR funds
- GLO developed an Action Plan (submitted May 8, 2018)
- Action Plan includes proposed use of funds
- Use of the funds is limited to unmet recovery needs from DR-4332

Action Plan

- 80% of $5.024 billion will go to most impacted counties (16) and certain zip codes
- 20% of funds go to the remaining 33 eligible counties, including Comal, Guadalupe, and Karnes
- COGs will develop local method of distributions (MOD) to local governments and eligible entities for CDBG DR housing and infrastructure funds for 2 of the 8 programs
- National Objectives: low and moderate income (LMI); elimination of slum/blight; urgent need; low/mod buyout (LMB); and low/mod incentive
Action Plan

- Homeowner Assistance Program ($4.2 M/$6.0 M)
- Local Buyout and Acquisition Program ($2.9 M/$4.1 M)
- Homeowner Reimbursement Program
- Homelessness Prevention Program
- Affordable Rental Program
- Partial Repair and Essential Power for Sheltering (PREPS) Program
- Local Infrastructure Program ($1 M/$1.5M)
- Economic Revitalization Program

Local Buyout and Acquisition Program ($4,152,165)

- Remove homes from harm's way
- Administered by local units of government and entities with the power of eminent domain authority
- Meet the 70% low and moderate income benefit requirement
- Examples of Eligible activities:
  - Buyouts
  - Acquisitions
  - Relocation/Down Payment assistance with buyout and acquisition;
  - Demolition only;
  - Activities designed to relocate families outside of floodplains;
  - FEMA Hazard Mitigation Grant Program cost share.
Local Buyout and Acquisition Program ($4,152,165)

**Acquisition:** The utilization of CDBG-DR disaster funds to acquire real property. Acquisition only is typically not considered a complete activity in the Program and must be combined with another eligible use (i.e., relocation assistance). The purchase price must be consistent with applicable uniform cost principles, and pre-disaster Fair Market Value (FMV) may not be used.

- Purchased at Post Event Fair Market Value
- Does not need to revert to Greenspace
- Local entity can rebuild on acquired property
- Down Payment Assistance
- Relocation Assistance

Local Buyout and Acquisition Program ($4,152,165)

**Buyout:** A type of acquisition with the purchase of an eligible property with the intent to reduce risk from future flooding or to reduce risk from the hazard that led to the property’s Disaster Risk Reduction Area. The property acquired will be dedicated and maintained in perpetuity for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

- Purchased at Pre-Event Fair Market Value
- Becomes Greenspace in perpetuity
- Comes off tax roll
- Down Payment Assistance
- Relocation Assistance
Local Buyout and Acquisition Program ($4,152,165)

- Minimum grant of $1,000,000
- Local entity must choose Buyout OR Acquisition (cannot do both in same community)
- Factors to Consider in development MOD
  - Up to 4 entities could be listed
  - $4,152,165 divided by $1,000,000 = 4.15
- 70% of the funds must benefit Low Moderate Income (LMI)
- Home must have had damage associated with Harvey (or exacerbated by Harvey)

Local Infrastructure Program ($1,530,000)

- Administered by GLO with local units of government (cities and counties) as subrecipients
- Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing
- Examples of Eligible Activities
  - Flood control and drainage repair and improvements, including the construction of rehabilitation of storm water management system;
  - 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
### Local Infrastructure Program ($1,530,000)

- Minimum grant of $100,000
- Factors to Consider in development of MOD
  - Up to 15 entities could be listed in MOD
  - $1,530,000 divided by $100,000 = 15.3
- 70% of the funds must benefit Low Moderate Income (LMI)
- Infrastructure must have been damaged by Harvey (or exacerbated by Harvey)

### Method of Distribution

- COG will facilitate a method of distribution (MOD) process with support of GLO
- Establish objective process for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need)
- Citizen Participation Process
  - Develop citizen participation plan
  - Conduct a minimum of two (2) public hearings prior to finalizing the MOD
  - One (1) public hearing shall be a “Public Planning Meeting”
  - Ensure a public comment period of at least 14 days
### Method of Distribution

- For Local Buyout and Acquisition: implement a minimum of $1,000,000 to any local entity receiving funding through the MOD
- For Local Infrastructure: implement a minimum of $100,000 to any local entity receiving funding through the MOD
- Facilitate local prioritization through the MOD
- A plan to meet the 70% low- and moderate-income benefit requirement
- Establish any additional parameters for eligibility beyond what is required by HUD or the GLO
- MOD is due to GLO by July 13, 2018

### MOD Factors

- Factors that have been used by COGs in past disasters
  - LMI percentage for entity AND/OR share of county LMI
  - Population of entity
  - FEMA claims by Household
  - NFIP repetitive claims
  - Reported Value of Disaster Impact of entity
  - FEMA/SBA/TDEM Damage Reports
  - Number of times affected by declared disaster since 2015
## Possible MOD Factor: Population

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<th>Community</th>
<th>Population</th>
<th>Percent</th>
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<tbody>
<tr>
<td>Comal</td>
<td>141,009</td>
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<tr>
<td>Guadalupe</td>
<td>159,659</td>
<td>50.54%</td>
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<tr>
<td>Karnes</td>
<td>15,187</td>
<td>4.81%</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>315,855</strong></td>
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Weighted against other factors  
Cities within each county  
US Census Bureau, Population Estimates 2017

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## Possible MOD Factor: # of damage reports

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<th># of Individual Assistance Applications</th>
<th># of Public Assistance Reports</th>
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<td>19</td>
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<td>Guadalupe</td>
<td>106</td>
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<td>Karnes</td>
<td>389</td>
<td>6</td>
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<td><strong>Total</strong></td>
<td><strong>521</strong></td>
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Weighted against other factors  
Cities within each county
### Possible MOD Factor: # of times affected by declared disaster since 2015

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<th># of times affected by disaster since 2015</th>
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<tr>
<td>Karnes</td>
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### Other MOD Factors to Consider

- **Comal County**: New Braunfels, Bulverde/Spring Branch, Garden Ridge, Canyon Lake
- **Guadalupe County**: Sequim, Cibolo, Schertz, Selma, Marion, McQueeny, Lake Dunlap, Kingsbury, Geronimo, Martindale
- **Karnes County**: Karnes City, Kenedy, Falls City, Runge, Gillett

Public Assistance
Housing/IA
Other MOD Factors to Consider

Public Feedback

- Open Forum

- Can also send feedback to disaster_recovery@aacog.com

Next Steps

June 27, 2018: draft Method of Distribution presented to AACOG Board of Directors

June 27, 2018: by 3:00 pm, draft MOD will be placed on AACOG website: www.aacog.com (14 day public comment begins); will distribute to cities/counties as well

July 6, 2018: Public Hearing at Seguin Event Center at 10:00 am for comments on MOD

July 13, 2018: MOD submitted to General Land Office (GLO)
Point of Contact

Stella Garcia
Sr. Director of Operations
210-362-5252
sgarcia1@aacog.com
# Public Planning Meeting
June 18, 2018 at 10:00 am

## AACOG Method of Distribution

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Phone Number</th>
<th>Email Address</th>
<th>Organization</th>
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</thead>
<tbody>
<tr>
<td>1. Kevin Meier</td>
<td>400 S Front ST</td>
<td>830 780 3722</td>
<td><a href="mailto:kmeier@co.karnes.tx.us">kmeier@co.karnes.tx.us</a></td>
<td>AACOG</td>
</tr>
<tr>
<td>2. Barbara Shinn</td>
<td>303 W Main St</td>
<td>583-2230</td>
<td><a href="mailto:barbara@co.karnes.tx.us">barbara@co.karnes.tx.us</a></td>
<td>CLOK</td>
</tr>
<tr>
<td>3. Amanda White</td>
<td></td>
<td></td>
<td><a href="mailto:amanda@co.karnes.tx.us">amanda@co.karnes.tx.us</a></td>
<td>CLOK</td>
</tr>
<tr>
<td>4. Brando Kase</td>
<td>512-915-7560</td>
<td></td>
<td><a href="mailto:Brando.Kase@co.karnes.tx.us">Brando.Kase@co.karnes.tx.us</a></td>
<td>CLO</td>
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<tr>
<td>5. Jillian Foster</td>
<td>307 S South St</td>
<td></td>
<td><a href="mailto:jill@co.karnes.tx.us">jill@co.karnes.tx.us</a></td>
<td>C. Council Knowledge</td>
</tr>
<tr>
<td>6. David N. Morgan</td>
<td>600 W Main St</td>
<td>830 583 9670</td>
<td><a href="mailto:dmorgan@co.karnes.tx.us">dmorgan@co.karnes.tx.us</a></td>
<td>NAIDA</td>
</tr>
<tr>
<td>7. Mary Lozano</td>
<td>210 W Calvert St 1100  EC</td>
<td>830 623 1344</td>
<td><a href="mailto:mllozano@co.karnes.tx.us">mllozano@co.karnes.tx.us</a></td>
<td>Karnes Co. Mgr.</td>
</tr>
<tr>
<td>8. Shelby Dupnik</td>
<td></td>
<td></td>
<td><a href="mailto:shelby.dupnik@co.karnes.tx.us">shelby.dupnik@co.karnes.tx.us</a></td>
<td>Karnes Co. Comm.</td>
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<tr>
<td>9. Judge Long</td>
<td></td>
<td>830 623 1344</td>
<td><a href="mailto:countj@co.karnes.tx.us">countj@co.karnes.tx.us</a></td>
<td>Karnes Co. Judge</td>
</tr>
<tr>
<td>10. J. Matthew</td>
<td>210 W Calvert St 100  Karnes City</td>
<td>830 400 2670</td>
<td><a href="mailto:countj@co.karnes.tx.us">countj@co.karnes.tx.us</a></td>
<td>Karnes County Admin.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Kennedy County Councilman (District 4)</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
<td>Phone Number</td>
<td>Email Address</td>
<td>Organization</td>
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</tr>
<tr>
<td>Robert Evans</td>
<td>314 E Calvert Ave</td>
<td>530-780-3422</td>
<td><a href="mailto:reves@cityofkecity.com">reves@cityofkecity.com</a></td>
<td>Karnes City</td>
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| 12.        |                            |                |                        |                       |
| 13.        |                            |                |                        |                       |
| 14.        |                            |                |                        |                       |
| 15.        |                            |                |                        |                       |
| 16.        |                            |                |                        |                       |
| 17.        |                            |                |                        |                       |
| 18.        |                            |                |                        |                       |
| 19.        |                            |                |                        |                       |
| 20.        |                            |                |                        |                       |
Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of $4,152,165 for Housing (Local Buyout and Acquisition Program) and $1,530,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4332 Hurricane Harvey) are Comal, Guadalupe, and Karnes County. A Public Planning Meeting is scheduled for the following date, time and location:

Monday, June 18, 2018, at 10:00 am at the Karnes County Courthouse Annex located at 210 W. Calvert, Karnes City, Texas, 78118.

A draft MOD will be developed from input received at the Public Planning Meeting. The draft MOD will be submitted to the AACOG Board of Directors on June 27, 2018, (10:00 am) for review and approval. Written and oral comments regarding this draft MOD will be taken at a Public Hearing scheduled for the following date, time and location:

Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Coliseum) located at 950 S. Austin Street, Seguin, Texas 78155.

The Draft MOD will be posted on Wednesday, June 27, 2018, at 3:00 pm on AACOG’s website (www.aacog.com) and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.com.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.
Invitación al público para hacer comentarios

Por este medio se informa que el Consejo de Gobiernos de la Región del Álamo (Alamo Area Council of Governments - AACOG) va a recibir sugerencias sobre el método de distribución (Method of Distribution - MOD) de $4,152,165 para la Vivienda (Programa Local de Adquisiciones) y de $1,530,000 para infraestructura, con fondos del programa de subsidios para el desarrollo de la comunidad para la recuperación del desastre del Huracán Harvey Hurricane Harvey Community Development Block Grant Disaster Recovery Funds(CDBG DR).

Los condados de AACOG designados como que sufrieron un impacto, con base en la Declaración de Desastre Federal (DR 4332 Huracán Harvey) son los Condados de Comal, Guadalupe, y Karnes.

Una reunión pública para la planificación está programada para la siguiente fecha, hora y ubicación:

Lunes, 18 de junio de 2018, a las 10:00 a.m. en el Anexo a Karnes County Courthouse, situado en 210 W. Calvert, Karnes City, Texas, 78118.

Se hará un proyecto MOD preliminar a partir de los comentarios y sugerencias recibidos en la reunión pública de planificación. El proyecto MOD será presentado a la Junta de Directores de AACOG el 27 de junio de 2018 (10:00) para su revisión y aprobación.

Habrá otra audiencia pública para recibir comentarios y observaciones escritas y orales sobre este proyecto MOD que está programada para la siguiente fecha, hora y ubicación:

Viernes, 6 de julio de 2018, a las 10:00 am en la Seguin Event Center (Coliseo) ubicado en 950 S. Austin Street, Seguin, Texas 78155.

El proyecto MOD será publicado el miércoles, 27 de junio de 2018, a las 3:00 pm en el sitio web de AACOG (www.aacog.com) y también estará disponible en el 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Los comentarios y observaciones adicionales, por escrito, deberán ser recibidos por AACOG a más tardar a las 5:00 p.m. del jueves, 12 de julio de 2018, a la atención de Stella García, Directora de Operaciones Senior, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 o disaster_recovery@aacog.com.

AACOG proporcionará adaptaciones razonables para las personas que asisten a las reuniones de AACOG. Las solicitudes de las personas que necesitan adaptaciones especiales deberán ser recibidas por los empleados de AACOG 72 horas antes del evento. Las reuniones públicas se llevarán a cabo en inglés y las solicitudes de intérpretes para otro idioma, o de otras necesidades especiales en materia de comunicación, deberán hacerse al menos 72 horas antes de cada evento. Por favor llame al 210-362-5252 para recibir más información.
Event Details

*Public Hearing Notice-
Solicitation for Public
Comment*

Monday, June 18, 2018
Notice is hereby given that the Alamo
Area Council of Governments
(AACOG) is seeking input on the
Method of Distribution (MOD) of
$4,152,165 for Housing (Local Buyout
and Acquisition Program) and
$1,530,000 for Infrastructure in
Hurricane Harvey Community
Development Block Grant Disaster
Recovery (CDBG DR) Funds. The
AACOG impacted counties as
designated from federal disaster
declaration (DR 4332 Hurricane
Harvey) are Comal, Guadalupe, and Karnes
County. A Public Planning Meeting is
scheduled for the following date, time and
location: Monday, June 18, 2018, at 10:00
am at the Karnes County Courthouse Annex
located at 210 W. Calvert, Karnes City,
Texas, 78118.

Date: June 18, 2018
Time: 10:00 AM - 12:00 PM
Details:
Location: Karnes County Courthouse Annex
Address: 210 W. Calvert
Karnes City, TX 78118
Contact: 210-362-5252
Email: Contact
(mailto:disaster_recovery@aacog.com)

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the
attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons
needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public
meetings will be conducted in English and requests for language interpreters or other special communication needs
should be made at least 72 hours prior to a function.
Affidavit of Publication

STATE OF TEXAS }  SS
COUNTY OF COMAL }

Jennifer Saunders-Debruyn, being duly sworn, says:

That she is Designee of the New Braunfels Herald-Zeitung, a daily newspaper of general circulation, printed and published in New Braunfels, Comal County, Texas; that the publication, a copy of which is attached hereto, was published in the said newspaper on the following dates:
June 14, 2018

That said newspaper was regularly issued and circulated on those dates.
SIGNED:

Designee

Subscribed to and sworn to me this 14th day of June 2018.

JENICE R. MARTINEZ, Customer Service Manager, Comal County, Texas
My commission expires: November 11, 2020

b0102196 00203429 (210)824-6011

Lisy Velazquez
Alamo Area Council of Governments-PBS
8700 Tesoro Dr., Ste. 700
SAN ANTONIO, TX 78217
Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of $4,452,085 for Housing (Local Repair and Acquisition Program) and $5,580,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDFG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4312 Hurricane Harvey) are Comal, Guadalupe, and Karnes County. A Public Planning Meeting is scheduled for the following date, time and location:

Monday, June 11, 2018, at 10:00 am at the Karnes County Courthouse Annex located at 218 W. Calvert, Karnes City, Texas, 78118.

A draft MOD will be developed from input received at the Public Planning Meeting. The draft MOD will be submitted to the AACOG Board of Directors on June 27, 2018, (10:00 am) for review and approval. Written and oral comments regarding this draft MOD will be taken at a Public Hearing scheduled for the following date, time and location:

Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Coliseum) located at 950 S. Austin Street, Seguin, Texas 78155.

The Draft MOD will be posted on Wednesday, June 27, 2018, at 3:00 pm on AACOG’s website (www.aacog.org) and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster.recovery@aacog.com.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-3752 for assistance.
AFFIDAVIT OF PUBLICATION

THE STATE OF TEXAS

COUNTY OF BEE

Before me, the undersigned authority, on this day personally appeared George G. Latcham, known to me, who, by me duly sworn, on his oath deposes and says that he is the Publisher of the Karnes Countywide, having general circulation in Karnes County, who being by me duly sworn, deposes and says that the foregoing attached notice was published in said newspaper on the following date(s), to wit:
June 13, 2018

George G. Latcham, Publisher

Sworn to and subscribed before me by George G. Latcham, this the 13 day of June 2018 AD
to certify which witness my hand and official seal.

Mary Virginia Massey
Notary Public in and for the State of Texas
Solicit active for Public

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of $4,152,165 for Housing (Local Buyout and Acquisition Program) and $1,500,000 for Infrastructure in Hurricane Harvey, Development Block grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4932 Hurricane Harvey) are Comal, Guadalupe, and Karnes County. A Public Planning Meeting is scheduled for the following date, time and location:

Monday, June 18, 2018
at 10:00 am at the
Karnes County
Conf. Room
located at 210 W. Calvert
Karnes City, Texas, 78118

A draft MOD will be developed and a draft MOD will be submitted to the AACOG Board of Directors on June 7, 2018, (10:00 am) for review and approval. Written and oral comments regarding this draft MOD will be taken at a Public Hearing scheduled for the following date, time and location:

Friday, July 6, 2018
at 10:00 am at the
Seguin Event Center
(Colliseum) located at
900 S. Austin St.
Seguin, Texas 78155.

The Draft MOD will be posted on AACOG’s website at www.aacog.org and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Additional written comments may be submitted to AACOG later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.org. AACOG will provide for reasonable accommodations for persons with disabilities. Requests from persons needing special accommodations should be received no later than 7:00 p.m. prior to the function. Public meetings will be conducted in English and requests for language interpreters or other special accommodations should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.

LaJuan Ihrig - Certified Real Estate Broker
OFFICE: (830) 583-2900

John D. Ihrig - Sales
Wes Stout - Sales
SAN ANTONIO EXPRESS NEWS
AFFIDAVIT OF PUBLICATION

STATE OF TEXAS:
COUNTY OF BEXAR

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this
cay personally appeared: Lynette Nelson, who after being duly sworn, says that she is the
BOOKKEEPER of HEARST NEWSPAPERS, LLC - dba: SAN ANTONIO EXPRESS-
NEWS, a daily newspaper published in Bexar County, Texas and that the publication, of
which the annexed is a true copy, was published to wit:

Customer ID: 705701
Customer Name: Alamo Area Council Of Govt
Order ID: 2966423

Lynette Nelson
Bookkeeper

Sworn and subscribed to before me, this 20 day of June, A.D. 2018

Notary public in and for the State of Texas

MONIQUE EGAN
Notary Public, State of Texas
Comm. Expires 09-03-2020
Notary ID 3183735
Meeting #2 Materials
AACOG Public Hearing
Community Development Block Grant Disaster Recovery (CDBG DR)
Development of Method of Distribution (MOD)

Meeting Minutes
July 6, 2018

Seguin Event Center
Seguin, Texas
10:00 am

I. Guests were asked to sign in (refer to attached sign in sheet).

II. Public Hearing was convened by Dr. Stella Garcia, Senior Director of Operations from AACOG.

III. Dr. Garcia provided an overview of the Action Plan and the purpose of the Public Hearing and used a PowerPoint presentation to guide the discussion (attached).

IV. Dr. Garcia described which two programs AACOG had developed a method of distribution (MOD) and provided definitions as well (refer to attached PowerPoint).

V. Dr. Garcia provided a list of factors that had been used by other COGs in past MOD developments to consider and then reviewed the three (3) factors that AACOG used and the associated data that was used to calculate the allocations. Dr. Garcia indicated that she had access to certain FEMA reports, such as Individual Assistance and Public Assistance reports as well as Small Business Administration (SBA) loan reports. For damage reports, Dr. Garcia indicated that almost 400 residents in Karnes County had submitted an Individual Assistance application to FEMA indicated damage to their homes more than Comal and Guadalupe County combined. But for Infrastructure, not as many FEMA Public Assistance reports were submitted between the cities and county compared to Comal County. For repeat disasters, Dr. Garcia indicated that while Karnes County had only been included in the most recent federal disaster declaration (Hurricane Harvey), the other two counties, Comal and Guadalupe had been named in three (3) federal disaster declarations since 2015. (Refer to attached PowerPoint).

The weighted factors are proposed as follows: 50% for damage reports; 25% for population; 25% for repeat disasters for both housing and infrastructure allocations.

VI. Because some of the towns/cities did not meet the $100,000 threshold for the infrastructure allocations as required in the GLO Action Plan, an alternative method of distribution was described which would add the allocations of those cities/towns to the county allocation. A copy of the allocations (spreadsheet) was also made available (refer to attached allocation spreadsheet).

VII. No Questions were asked nor comments made.
VIII. Public Hearing concluded at approximately 10:25 am.
Method of Distribution (MOD)  
Community Development Block Grant  
Disaster Recovery (CDBG DR) Funds

Public Hearing  
Seguin Event Center

presented by  
Stella E. Garcia, PhD  
Sr. Director of Operations  
Alamo Area Council of Governments (AACOG)

July 6, 2018 at 10:00 am

Purpose and Role

Purpose: Public Hearing is to hear comments on the draft Method of Distribution (MOD)

Roles:

Alamo Area Council of Governments (AACOG) is facilitating the meeting and has developed the MOD to submit to GLO

General Land Office (GLO) will administer the programs in the Action Plan
General Land Office (GLO) Action Plan

- US Housing and Urban Development (HUD) allocated $5.024 billion to Texas in response to Hurricane Harvey, DR-4332
- General Land Office (GLO) has been designated by the governor to administer CDBG DR funds
- GLO developed an Action Plan (submitted May 8, 2018)
- Action Plan includes proposed use of funds
- Use of the funds is limited to unmet recovery needs from DR-4332

Action Plan

- 80% of $5.024 billion will go to most impacted counties (16) and certain zip codes
- 20% of funds go to the remaining 33 eligible counties, including Comal, Guadalupe, and Karnes
- COGs will develop local method of distributions (MOD) to local governments and eligible entities for CDBG DR housing and infrastructure funds for 2 of the 8 programs
- **National Objectives:** low and moderate income (LMI); elimination of slum/blight; urgent need; low/mod buyout (LMB); and low/mod incentive
Action Plan

- Homeowner Assistance Program ($4.2 M/$6.0 M)
- Local Buyout and Acquisition Program ($2.9 M/$4.1 M)
- Homeowner Reimbursement Program
- Homelessness Prevention Program
- Affordable Rental Program
- Partial Repair and Essential Power for Sheltering (PREPS) Program
- Local Infrastructure Program ($1 M/$1.5M)
- Economic Revitalization Program

Local Buyout and Acquisition Program ($4,152,165)

- Remove homes from harm's way
- Administered by local units of government and entities with the power of eminent domain authority
- Meet the 70% low and moderate income benefit requirement
- Examples of Eligible activities:
  - Buyouts
  - Acquisitions
  - Relocation/Down Payment assistance with buyout and acquisition;
  - Demolition only;
  - Activities designed to relocate families outside of floodplains;
  - FEMA Hazard Mitigation Grant Program cost share.
**Local Buyout and Acquisition Program ($4,152,165)**

**Acquisition:** The utilization of CDBG-DR disaster funds to acquire real property. Acquisition only is typically not considered a complete activity in the Program and must be combined with another eligible use (i.e., relocation assistance). The purchase price must be consistent with applicable uniform cost principles, and pre-disaster Fair Market Value (FMV) may not be used.

- Purchased at Post Event Fair Market Value
- Does not need to revert to Greenspace
- Local entity can rebuild on acquired property
- Down Payment Assistance
- Relocation Assistance

---

**Local Buyout and Acquisition Program ($4,152,165)**

**Buyout:** A type of acquisition with the purchase of an eligible property with the intent to reduce risk from future flooding or to reduce risk from the hazard that led to the property’s Disaster Risk Reduction Area. The property acquired will be dedicated and maintained in perpetuity for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

- Purchased at Pre-Event Fair Market Value
- Becomes Greenspace in perpetuity
- Comes off tax roll
- Down Payment Assistance
- Relocation Assistance
Local Buyout and Acquisition Program
($4,152,165)

- Minimum grant of $1,000,000
- Local entity must choose Buyout OR Acquisition (cannot do both in same community)
- Factors to Consider in development MOD
  - Up to 4 entities could be listed
  - $4,152,165 divided by $1,000,000 = 4.15
- 70% of the funds must benefit Low Moderate Income (LMI)
- Home must have had damage associated with Harvey (or exacerbated by Harvey)

Local Infrastructure Program
($1,530,000)

- Administered by GLO with local units of government (cities and counties) as subrecipients
- Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing
- Examples of Eligible Activities
  - Flood control and drainage repair and improvements, including the construction of rehabilitation of storm water management system;
  - 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
Local Infrastructure Program
($1,530,000)

- Minimum grant of $100,000

- Factors to Consider in development of MOD
  Up to 15 entities could be listed in MOD
  $1,530,000 divided by $100,000 = 15.3

- 70% of the funds must benefit Low Moderate Income (LMI)

- Infrastructure must have been damaged by Harvey (or exacerbated by Harvey)

Method of Distribution

- COG will facilitate a method of distribution (MOD) process with support of GLO

- Establish objective process for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need)

- Citizen Participation Process
  Develop citizen participation plan
  Conduct a minimum of two (2) public hearings prior to finalizing the MOD
  One (1) public hearing shall be a “Public Planning Meeting”
  Ensure a public comment period of at least 14 days
Method of Distribution

- For Local Buyout and Acquisition: implement a minimum of $1,000,000 to any local entity receiving funding through the MOD
- For Local Infrastructure: implement a minimum of $100,000 to any local entity receiving funding through the MOD
- Facilitate local prioritization through the MOD
- A plan to meet the 70% low- and moderate-income benefit requirement
- Establish any additional parameters for eligibility beyond what is required by HUD or the GLO
- MOD is due to GLO by July 13, 2018

MOD Factors

- Factors that have been used by COGs in past disasters
  - LMI percentage for entity AND/OR share of county LMI
  - Population of entity
  - FEMA claims by Household
  - NFIP repetitive claims
  - Reported Value of Disaster Impact of entity
  - FEMA/SBA/TDEM Damage Reports
  - Number of times affected by declared disaster since 2015
**Possible MOD Factor: Population**

<table>
<thead>
<tr>
<th>Community</th>
<th>Population</th>
<th>Percent</th>
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<tbody>
<tr>
<td>Comal</td>
<td>141,009</td>
<td>44.64</td>
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<tr>
<td>Guadalupe</td>
<td>159,659</td>
<td>50.54</td>
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<tr>
<td>Karnes</td>
<td>15,187</td>
<td>4.81</td>
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<tr>
<td>Total</td>
<td>315,855</td>
<td>99.99</td>
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Weighted against other factors
Cities within each county

US Census Bureau, Population Estimates 2017

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**Possible MOD Factor: # of damage reports**

<table>
<thead>
<tr>
<th>Community</th>
<th># of Individual Assistance Applications</th>
<th># of Public Assistance Reports</th>
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<tbody>
<tr>
<td>Comal</td>
<td>26</td>
<td>19</td>
</tr>
<tr>
<td>Guadalupe</td>
<td>106</td>
<td>20</td>
</tr>
<tr>
<td>Karnes</td>
<td>389</td>
<td>6</td>
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<tr>
<td>Total</td>
<td>521</td>
<td>45</td>
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</table>

Weighted against other factors
Cities within each county

Aging Area Council of Governments
Communities which submitted Damage Reports

- Comal County: New Braunfels, Bulverde/Spring Branch, Garden Ridge, Canyon Lake
- Guadalupe County: Seguin, Cibolo, Schertz, Selma, Marion, McQueeney, Lake Dunlap, Kingsbury, Geronimo, Martindale
- Karnes County: Karnes City, Kenedy, Falls City, Runge, Gillett

Public Assistance
Housing/IA

Possible MOD Factor: # of times affected by declared disaster since 2015

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<th>Community</th>
<th># of times affected by disaster since 2015</th>
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<td>Comal</td>
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<td>Karnes</td>
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Public Comments

- Open Forum

- Can also send feedback to disaster_recovery@aacog.com

Next Steps

July 6, 2018: Public Hearing at Seguin Event Center at 10:00 am for comments on MOD

July 13, 2018: MOD submitted to General Land Office (GLO)

July 25, 2018: AACOG Board ratifies MOD

July/August: GLO will release guidelines for Housing and Infrastructure Programs

Fall 2018: GLO will survey communities for Planning activities
# Points of Contact

**Primary Contact**  
Stella Garcia  
Sr. Director of Operations  
210-362-5252  
sgarcia1@aacog.com

**Secondary Contracts**  
Claudia Mora  
Director of Regional Services  
cmora@aacog.com

Al Cervera  
Regional Disaster Recovery Coordinator  
acervera@aacog.com
**Public Hearing**  
**July 6, 2018 at 10:00 am**  
**Seguin Event Center**  
**AACOG Method of Distribution**

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<th>Name</th>
<th>Address</th>
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<tr>
<td>1. Deane Paul</td>
<td>8700 Tesoro</td>
<td>210-362-3221</td>
<td><a href="mailto:dmpaul@aaco.org">dmpaul@aaco.org</a></td>
<td>AACOG</td>
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<td>2. Claudia Mora</td>
<td>8700 Tesoro</td>
<td>210-918-1234</td>
<td><a href="mailto:cmora@aaco.org">cmora@aaco.org</a></td>
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<td>3. Al Conners</td>
<td>8700 Tesoro</td>
<td>210-687-3264</td>
<td><a href="mailto:aconners@aaco.org">aconners@aaco.org</a></td>
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<td>4. Stella Garcia</td>
<td>8700 Tesoro</td>
<td>210-362-5352</td>
<td><a href="mailto:stgarcia1@aaco.org">stgarcia1@aaco.org</a></td>
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Public Hearing  
July 6, 2018 at 10:00 am  
Seguin Event Center  
AACOG Method of Distribution

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Stella Garcia

From: Stella Garcia
Sent: Wednesday, June 27, 2018 3:09 PM
To: 'cdr@glo.texas.gov'; 'Shawn Strange'; Alexandra Gambè; 'Ginny Lewis'
Subject: AACOG MOD on website

http://aacog.com/ found at the bottom left corner of the page under the heading of “public comments”

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell

Celebrating 50 Years of Uniting the Region

Please take a moment to complete the AACOG Customer Satisfaction Survey.
2017 Annual Report

Archive / Agenda Center

Bid Opportunities

COG State Reports & Agency Documents

Employment

Equal Opportunity Statement

Open Records Request

Vendor Information

Veteran Programs

Volunteer Opportunities

BE SAFE Certification Course

There is a recognized gap between the needs and responsibilities of the law enforcement community and the optimal way to interact with persons with special needs, especially those on the autism spectrum. This course strives to bridge that gap. Read on...

View All
The Alamo Area Council of Governments (AACOG) has drafted a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling $5,682,165 for the three disaster identified counties — Comal, Guadalupe and Karnes. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The summary MOD can be found here. AACOG will be taking public comments for the next 14 calendar days. A public hearing will take place on July 6, 2018, at 10:00 a.m. at the Seguin Event Center to take comments on the MOD. You may submit your comments to disaster_recovery@aacog.com.

Want to learn more about Medicare Fraud?
Have you been searching for a way to give back to your community? Join us today and become a Senior Medicare Patrol Volunteer! We are looking for volunteers to help us educate Medicare beneficiaries in the Alamo Region.

For more information, contact: Teresa Banda (210) 918-1281 / tbanda@aacog.com

Membership
The AACOG regional membership directory contains contact information for all AACOG members. View information on becoming an AACOG member. For more information, please contact Heman Rozemberg, (210) 362-5203, or hrozemberg@aacog.com.
Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of $4,152,165 for Housing (Local Buyout and Acquisition Program) and $1,530,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4332 Hurricane Harvey) are Comal, Guadalupe, and Karnes County.

The draft MOD will be reviewed by the AACOG Board of Directors on June 27, 2018, at 10:00 am. The draft MOD will be posted on AACOG’s website (www.aacog.com) on Wednesday, June 27, 2018, at 3:00 pm and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Written and oral comments regarding this draft MOD will be taken at a Public Hearing scheduled for the following date, time and location:

Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Coliseum) located at 950 S. Austin Street, Seguin, Texas 78155.

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.com.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.
Fyi – also sent to Judge Long and other 2 commissioners under separate emails –Open meetings caution.

Per previous discussions on funding opportunities with CDBG DR funds. Please share with other folks as you see fit.

Mary J. Lozano
KC Commissioner Pct. 3
210 W. Calvert, Ste. 160
Karnes City, Tx 78118
830 623 1344

Stella Garcia
Stella Garcia <sgarcia1@aacog.com>
Tuesday, June 05, 2018 5:18 PM
To: m.lozano <m.lozano@co.karnes.tx.us>; shelby.dupnik@co.karnes.tx.us
Subject: Karnes County Meetings

Good afternoon Mary,

Here is the information to share with city/county officials and any other organization that has eminent domain authority with property in Karnes County.

Join us on Thursday, June 14, 2018, at 1:00 pm at County Jail Courtroom (500 E. Wall St., Karnes City, Tx). Stella Garcia with Alamo Area Council of Governments (AACOG) will be here to share information on Community Development Block Grant Disaster Recovery (CDBG DR) funds for Housing and Infrastructure associated with damage caused by Hurricane Harvey. The AACOG region has been allocated $4.5 million in Housing (Acquisition and Buyout Program) and $1.5 million in Infrastructure for the 3 counties in the federal disaster declaration which are Karnes, Comal, and Guadalupe. No match is required. AACOG is working with the General Land Office (GLO) and is required to develop a method of distribution (allocations) for the affected communities and have established criteria for us to do so.

Stella will provide information on not only these two programs but others in the state’s Action Plan (http://texasrebuidls.org/Documents/Action%20Plan%20-%20%205%20Billion%20Final%20Draft%20Q5-8-2018.pdf) during this meeting. She will also share data provided by FEMA on individual assistance applications for Karnes County.

Stella will also share information related to the public participation plan which includes holding a Public Planning Meeting and Public Hearing associated with developing the method of distribution.
Here is the proposed schedule of events:

June 14, 2018: AACOG meets with city/county officials to give detailed information on the programs and next steps (closed meeting).

June 18, 2018: Public Planning Meeting at 10:00 am in County Courthouse Annex to seek feedback from the community, housing authorities and other interested stakeholders on method of distribution (MOD) factors to consider (such as FEMA applications, low moderate income population, repetitive flood claims).

June 27, 2018: AACOG Board of Directors review and approve draft method of distribution and release the MOD on website and forward to affected communities to post on their website/local offices for 14 day public comment period.

July 6, 2018: Public Hearing at 10:00 am at Seguin Event Center (Coliseum) for comment on MOD.

July 13, 2018: AACOG submits MOD to General Land Office for review and approval.

Once GLO approved the MOD, eligible entities (city, county, etc) will apply for funding from GLO.

We look forward to seeing you on Thursday, June 14th.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
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Thank you for meeting with me this morning. It was very helpful to me, and I hope I was able to provide relevant information to you.

The following links are resources that you might want to review:


New release for 2016 Disaster Funds (Bandera County included) [http://texasrebuids.org/Pages/2016Floods.aspx](http://texasrebuids.org/Pages/2016Floods.aspx) I'm sharing this one so you can have an idea what to expect when the 2015 flood funds and additional Harvey funds are released.

I'll also be sending questions to the GLO staff regarding the items you raised in our meeting this morning. I'll keep you posted of what I learn.

Please do not hesitate to contact me if you have any questions/concerns on this or any other AACOG matter.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell
Good afternoon!

I look forward to meeting you all tomorrow afternoon. I hope you and/or your designee is able to attend the meeting.

I've also attached the Public Notice that should have been in today's area newspapers. I have included an English and Spanish version. Please share/post accordingly.

Thank you. See you tomorrow.

Stella

---

From: Mary Lozano [mailto:m.lozano@co.karnes.tx.us]
Sent: Wednesday, June 06, 2018 8:00 AM
To: 'revans@cityofkctx.com'; 'patronlott@att.net'; 'barbara@cityofkenedy.org'; 'mbhoudmann@yahoo.com'
Cc: 'robert.ebrom@co.karnes.tx.us'; 'dwayne.villanueva@co.karnes.tx.us'; 'shelby.dupnik@co.karnes.tx.us'
Subject: FW: Karnes County Meetings

Per previous discussions on funding opportunities with CDBG DR funds. Please share with other folks as you see fit.

Mary J. Lozano
KC Commissioner Pct. 3
210 W. Calvert, Ste. 160
Karnes City, Tx 78118
830 623 1344

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Sent: Tuesday, June 05, 2018 5:18 PM
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We look forward to seeing you on Thursday, June 14th.

Stella

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Virus-free. www.avast.com
Dr. Garcia:

Please be advised that Kenedy desires to participate in the GLO/AACOG grant funding. It appears that infrastructure would be most beneficial to us.

I am cc’ing Mayor Lott from Runge, he is my sister city. He was not able to attend yesterday; however, I am sure that he is interested in grants for his city as well. He asked me to relay the information to him. I’m attaching the GLO information you handed out.

Please keep us in the loop of what we need to do next to secure our funds.

Thanks,

Barbara Najvar Shaw, M.S.
830-583-2230
830-583-2063 Fax
barbara@cityofkenedy.org
Stella Garcia

From: Jonathan Stinson <jstinson@gbra.org>
Sent: Monday, July 02, 2018 10:26 AM
To: Stella Garcia; Darrell Nichols
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella:
Yes, we would appreciate being included when y’all discuss regional planning associated with flood hazard mitigation.

Thanks again.

Jonathan Stinson
Deputy General Manager
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, Texas 78155
830-379-5822 – office
jstinson@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>
Sent: Friday, June 29, 2018 3:32 PM
To: Jonathan Stinson <jstinson@gbra.org>; Darrell Nichols <dnichols@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Jonathan,

Thanks for the information. This is helpful. I don’t anticipate we will need any additional information from you related to the Method of Distribution we are finalizing.

On another note, I anticipate we will be involved in regional planning associated with hazard mitigation in flood prone communities based on funding we expect in the future. May we call on you when we begin these discussions?

Stella

From: Jonathan Stinson [mailto:jstinson@gbra.org]
Sent: Thursday, June 28, 2018 4:15 PM
To: Stella Garcia <sgarcia1@aacog.com>; Darrell Nichols <dnichols@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella:

Thanks for the information, I apologize for my delay in responding. I’m not certain that GBRA has any projects that would qualify for these CDBG funds. As an entity, GBRA did not receive any damage to our facilities or infrastructure in Comal or Guadalupe counties related to Harvey. Additionally, GBRA is not a participating entity in NFIP or SRL where we acquire properties described for this program. For properties along the Guadalupe river in these counties I believe the
cities of New Braunfels and Seguin, along with the counties, have conducted the buy-outs and raising of properties above the 100 yr floodplain.

Please let me know if this addresses GBRA’s ability, or limitation, on participation or if you need additional info.

Thanks for reaching out and making us aware.

Jonathan Stinson
Deputy General Manager
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, Texas 78155
830-379-5822 – office
jstinson@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>
Sent: Thursday, June 21, 2018 3:15 PM
To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

This is the presentation I conducted at a public planning meeting in Karnes County this past Monday.

As stated below, there is $4.1 million for buyout and acquisition program in the Harvey impacted counties (in the AACOG region). Comal, Karnes, and Guadalupe County had over 500 households that applied for federal aid after Harvey. Not all were awarded funds but what it tells me is that people indicated Harvey damaged their homes. For homes damaged or exacerbated by Harvey, HUD has allocated CDBG DR funds to GLO to allocate to eligible entities to buyout or acquire homes. For buyout, the homes are purchased at pre-event fair market value and demolished. The site becomes greenspace and off the tax rolls in perpetuity. Funding should also be made available for down payment or relocation assistance. For acquisition, the homes are purchased at post event fair market value and demolished. You can rebuild upon the site but obviously with proper safeguards to protect the homes. Few of the communities I have spoken to feel that they want to exercise either option. But if they did, it would be through a voluntary program, meaning they would let the homeowners know that they would buy them out (or through acquisition) and let the homeowner decide. But it would be entirely up to the eligible entity.

An eligible entity is a unit of local government and entities with the power of eminent domain authority. The caveat is that the use of the funds has to meet the HUD National Objectives of low moderate income (LMI) with at least 70% of the allocated funds.

I’m happy to have a conversation with Jonathan. I’ll try him later today. We are taking a draft Method of Distribution to our Board of Directors on Wednesday, June 27th.

Stella

From: Darrell Nichols <dnichols@gbra.org>
Sent: Thursday, June 21, 2018 1:45 PM
To: Stella Garcia <sgarcia1@aacog.com>; Jonathan Stinson <jstinson@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella,
Thank you for the information. My initial thought is that GBRA would like to be considered as an eligible entity but I would like more information on what it means for GBRA to be an eligible entity. I would also be interested in any information you might have on the type of projects/buy-outs or locations that AACOG may be focusing its recommendation for distribution of any funds.

I will be out of the office until July 2nd but you can also reach Jonathan Stinson at 830-379-5822.

Darrell Nichols  
Senior Deputy General Manager  
Guadalupe-Blanco River Authority  
933 East Court Street  
Seguin, Texas 78155  
830-379-5822 – office  
512-917-6065 – cell  
dnichols@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>  
Sent: Wednesday, June 20, 2018 2:04 PM  
To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>  
Subject: Buyout and Acquisition Program—CDBG DR Funds

Good afternoon,

I just left a message on Mr. Nichols phone regarding a Method of Distribution (MOD) Alamo Area Council of Governments (AACOG) is developing at the request of the General Land Office as stated in their Action Plan to HUD (http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf). Anyhow, the COGs are developing MODs for the Housing Buyout and Acquisition Program and Infrastructure Program. The Housing Program is for entities with eminent domain authority. I have spoken to Comal, Guadalupe, and Karnes County (listed in Federal Disaster Declaration associated with Hurricane Harvey) representatives as well as the larger cities in those counties to inform them of this option. It was suggested that I contact your agency as well to see if you all may want to be considered as an eligible entity for the Buyout and Acquisition program. There is $4,152,165 allocated to the AACOG region for this program. AACOG is developing the method to distribute or allocate these funds to eligible entities. The minimum allocation we can make according to GLO’s Action Plan is $1,000,000; therefore, only up to 4 entities will be included in our drafted MOD. A draft MOD will be brought to the AACOG board of directors on June 27th and then posted for a 14 day public comment period. We will have a Public Hearing in Seguin on Friday, July 6th at 10:00 am (see attached Public Notice).

I’m happy to have a conversation with you or your designee(s) on what this may mean to your agency. Please do not hesitate to contact me via either phone number listed below (in my signature block) or via reply to this email.

I look forward to hearing from you.

Stella

Stella E. Garcia, PhD  
Senior Director of Operations  
Alamo Area Council of Governments  
8700 Tesoro Drive, Suite 160  
San Antonio, Texas 78217-6221
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Stella Garcia

From: Darrell Nichols <dnichols@gbra.org>
Sent: Thursday, June 21, 2018 1:45 PM
To: Stella Garcia; Jonathan Stinson
Cc: Kevin Patteson
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

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dnichols@gbra.org

---

From: Stella Garcia <sgarcia1@aacog.com>
Sent: Wednesday, June 20, 2018 2:04 PM
To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>
Subject: Buyout and Acquisition Program--CDBG DR Funds

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I’m happy to have a conversation with you or your designee(s) on what this may mean to your agency. Please do not hesitate to contact me via either phone number listed below (in my signature block) or via reply to this email.
I look forward to hearing from you.

Stella

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Stella Garcia

From: Stella Garcia
Sent: Tuesday, July 03, 2018 11:25 AM
To: m.lozano@m.lozano@co.karnes.tx.us; shelby.dupnik@co.karnes.tx.us;
'revans@cityofkctx.com'; 'Barbara Shaw'; 'Robin Shadr'; 'meckmann@nbtx.org';
'acardiel@nbtx.org'; 'gford@nbtx.org'; 'kellej@co.comal.tx.us';
'valadm@co.comal.tx.us'; 'contact2@co.comal.tx.us'; 'dfaseler@seguintexas.gov';
'dlosey@seguintexas.gov'; 'wolverton@co.guadalupe.tx.us'; 'krause@co.comal.tx.us';
'Patrick Pinder'; 'Trish Tumlinson'; 'city.of.runge@sbcglobal.net'; 'Homer Lott'
Cc: Claudia Mora; Alfredo Cervera
Subject: REMINDER Public Hearing--CDBG DR Funds--July 6th at 10:00 am in Seguin

Good morning!

Just a reminder that there will be a Public Hearing on the draft Method of Distribution (MOD) for the Housing Buyout and Acquisition Program ($4,152,165) and the Local Infrastructure Program ($1,530,000) on Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Seguin Coliseum) located at 950 S. Austin Street in Seguin, Texas.

The draft Method of Distribution (MOD) can be found on the AACOG website: http://aacog.com/ Information can be found on lower left corner of our home page under “Public Comments”. The AACOG Board of Directors reviewed and approved this draft on Wednesday, June 27th. Public Comments will be open until next Wednesday, July 13th. You may provide comment during the Public Hearing or email to disaster_recovery@aacog.com.

Thank you!

I look forward to seeing you there.

Have a happy and safe 4th of July!

Stella

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Senior Director of Operations
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Public Comments
Hi Ms. Garcia,

I was wondering where the data used in the BVCOG MOD comes from. Specifically, what is the source for the repeat disasters and damage reports?

Thanks!

Amelia

--

Amelia Clare Adams
Community Planner
Fair Housing and Disaster Recovery Analyst
Texas Housers
510.418.7480
Thank you for your comments.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
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From: Maddie Sloan [mailto:msloan@texasappleseed.net]
Sent: Thursday, July 12, 2018 2:57 PM
To: Disaster <disaster_recovery@aacog.com>
Cc: Brennan Griffin <bgriffin@texasappleseed.net>; Bridgette Guzman <bguzman@texasappleseed.net>
Subject: Comments on AACOG MOD

My apologies, I did not attach the comments to my original email.

Thank you,
Maddie Sloan

--

M. Madison Sloan

Director, Disaster Recovery and Fair Housing Project
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**

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.

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.

<table>
<thead>
<tr>
<th>Income Category</th>
<th>Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low Income (ELI)</td>
<td>0-30% AMI</td>
</tr>
<tr>
<td>Very Low Income (VLI)</td>
<td>30-50% AMI</td>
</tr>
<tr>
<td>Low Income (LI)</td>
<td>50-80% AMI</td>
</tr>
<tr>
<td>Not Low or Median Income (Non-LMI)</td>
<td>80%+ AMI</td>
</tr>
</tbody>
</table>
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 Undercounted Renters

<table>
<thead>
<tr>
<th>Rank</th>
<th>Zip Code</th>
<th>Area</th>
<th>Additional Unmet Need*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>77642</td>
<td>Port Arthur</td>
<td>$12,958,749</td>
</tr>
<tr>
<td>2</td>
<td>77026</td>
<td>Houston - Kashmere Gardens, Fifth Ward</td>
<td>$9,381,477</td>
</tr>
<tr>
<td>3</td>
<td>77060</td>
<td>Houston - Greater Greenspoint</td>
<td>$8,288,539</td>
</tr>
<tr>
<td>4</td>
<td>77078</td>
<td>East Houston, East Little York, uninc. Harris County</td>
<td>$6,232,608</td>
</tr>
<tr>
<td>5</td>
<td>77539</td>
<td>Texas City, Dickinson, League City</td>
<td>$6,161,607</td>
</tr>
<tr>
<td>6</td>
<td>77640</td>
<td>Port Arthur</td>
<td>$5,868,415</td>
</tr>
<tr>
<td>7</td>
<td>77044</td>
<td>Lake Houston and unincorporated Harris County</td>
<td>$5,830,581</td>
</tr>
<tr>
<td>8</td>
<td>78382</td>
<td>Rockport, Fulton, uninc. Aransas County</td>
<td>$5,665,630</td>
</tr>
<tr>
<td>9</td>
<td>77013</td>
<td>Houston - Northshore, Eldorado/Oates Prairie</td>
<td>$5,313,604</td>
</tr>
<tr>
<td>10</td>
<td>77028</td>
<td>Houston - Trinity, Kashmere Gardens, Settegast, East Houston</td>
<td>$5,129,694</td>
</tr>
<tr>
<td>11</td>
<td>77089</td>
<td>Houston - Southbelt/Ellington and uninc. Harris County</td>
<td>$5,008,949</td>
</tr>
<tr>
<td>12</td>
<td>77034</td>
<td>Houston - South Belt/Ellington, Edgbrook, Clear Lake</td>
<td>$5,002,261</td>
</tr>
<tr>
<td>13</td>
<td>77084</td>
<td>Houston - Addicks Park Ten, uninc. Harris County</td>
<td>$4,793,499</td>
</tr>
<tr>
<td>14</td>
<td>77096</td>
<td>Houston - Meyerland, Willow Meadows, Westbury, Brays Oaks</td>
<td>$4,162,645</td>
</tr>
<tr>
<td>15</td>
<td>77101</td>
<td>Houston - East Little York/Homestead, Trinity/Houston Gardens</td>
<td>$4,052,771</td>
</tr>
<tr>
<td>16</td>
<td>78336</td>
<td>Aransas Pass, Ingleside, uninc. Aransas and San Patricio County</td>
<td>$3,862,104</td>
</tr>
<tr>
<td>17</td>
<td>77015</td>
<td>Houston - Northshore, Galena Park, uninc. Harris County</td>
<td>$3,568,755</td>
</tr>
<tr>
<td>18</td>
<td>77630</td>
<td>Orange, West Orange, Pinehurst, uninc. Orange County (south)</td>
<td>$3,455,840</td>
</tr>
<tr>
<td>19</td>
<td>77090</td>
<td>Houston - Greater Greenspoint, uninc. Harris County</td>
<td>$3,410,527</td>
</tr>
<tr>
<td>20</td>
<td>77075</td>
<td>Houston - Greater Hobby, South Belt/Ellington</td>
<td>$3,392,014</td>
</tr>
</tbody>
</table>

**TOTAL** | **$11,520,079**

### Most Undercounted Owners

<table>
<thead>
<tr>
<th>Rank</th>
<th>Zip Code</th>
<th>Area</th>
<th>Additional Unmet Need*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>77642</td>
<td>Port Arthur</td>
<td>$28,281,485</td>
</tr>
<tr>
<td>2</td>
<td>77044</td>
<td>Lake Houston and unincorporated Harris County</td>
<td>$27,154,740</td>
</tr>
<tr>
<td>3</td>
<td>77539</td>
<td>Texas City, Dickinson, League City</td>
<td>$21,640,536</td>
</tr>
<tr>
<td>4</td>
<td>77037</td>
<td>Houston - Greenspoint</td>
<td>$21,325,458</td>
</tr>
<tr>
<td>5</td>
<td>77662</td>
<td>Vidor, Pine Forest, Rose City, uninc. Jefferson County</td>
<td>$21,181,682</td>
</tr>
<tr>
<td>6</td>
<td>77640</td>
<td>Port Arthur</td>
<td>$20,920,065</td>
</tr>
<tr>
<td>7</td>
<td>77028</td>
<td>Houston - East Houston, Trinity/Houston Gardens, Settegast, Kashmere Gardens</td>
<td>$20,624,860</td>
</tr>
<tr>
<td>8</td>
<td>77089</td>
<td>Houston - Southbelt/Ellington and uninc. Harris County</td>
<td>$18,824,792</td>
</tr>
<tr>
<td>9</td>
<td>77034</td>
<td>Houston - South Belt/Ellington, Edgbrook, Clear Lake</td>
<td>$16,911,624</td>
</tr>
<tr>
<td>10</td>
<td>77039</td>
<td>Houston - Greater Greenspoint</td>
<td>$15,387,093</td>
</tr>
<tr>
<td>11</td>
<td>78382</td>
<td>Rockport, Fulton, uninc. Aransas County</td>
<td>$15,163,049</td>
</tr>
<tr>
<td>12</td>
<td>77630</td>
<td>Orange, West Orange, Pinehurst, uninc. Orange County (south)</td>
<td>$14,570,598</td>
</tr>
<tr>
<td>13</td>
<td>77632</td>
<td>Orange, uninc. Orange County (north)</td>
<td>$14,549,059</td>
</tr>
<tr>
<td>14</td>
<td>77078</td>
<td>East Houston, East Little York, uninc. Harris County</td>
<td>$14,162,279</td>
</tr>
<tr>
<td>15</td>
<td>77511</td>
<td>Alvin, Hillcrest, League City, uninc. Brazoria and Galveston Counties</td>
<td>$14,047,116</td>
</tr>
<tr>
<td>16</td>
<td>77093</td>
<td>Houston - Eastex-Jensen Area, uninc. Harris County</td>
<td>$12,065,163</td>
</tr>
<tr>
<td>17</td>
<td>77587</td>
<td>South Houston (city)</td>
<td>$11,007,245</td>
</tr>
<tr>
<td>18</td>
<td>77535</td>
<td>Dayton, Dayton Lakes, Kenefick, Liberty, Mont Belvieu, Old River-Winfree, uninc. Liberty County</td>
<td>$10,838,771</td>
</tr>
<tr>
<td>19</td>
<td>77075</td>
<td>Houston - Greater Hobby, South Belt/Ellington</td>
<td>$10,484,490</td>
</tr>
<tr>
<td>20</td>
<td>77084</td>
<td>Houston - Addicks Park Ten, uninc. Harris County</td>
<td>$10,408,647</td>
</tr>
</tbody>
</table>

**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.*
Alamo Area Council of Governments  
ATTN: Stella Garcia, Sr. Director of Operations  
8700 Tesoro Drive, Suite 160  
San Antonio, Texas 78217  
Submitted via email to: disaster_recovery@aacog.com  

Re: Texas Appleseed Comments on AACOG MOD for Disaster Recovery: Hurricane Harvey  

Dear Ms. Garcia:  

We appreciate the opportunity to provide comments on the AACOG Plan for Disaster Recovery: Hurricane Harvey, covering $5,682,165 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.  

AACOG’s MOD is not compliant with GLO requirements as it does not follow the MOD form provided by GLO and consists only of data and allocation tables, with no explanation on method of distribution. According to the “Councils of Government Method of Distribution Guidance” issued by GLO, allocation tables do not constitute a MOD. Additionally, with no MOD Summary form, 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 AACOG will meet its LMI benefit and affirmatively furthering fair housing obligations.

Nor does the published draft include a certification that AACOG will certify that it is in compliance with its obligation to affirmatively further fair housing (AFFH) and will receive GLO training and technical assistance on AFFH.

In addition, the MOD does not provide any details about its local buyout and acquisition program, or its infrastructure program. Nor does the MOD indicate whether AACOG will limit or prioritize the types of projects allowed or the process and factors that were used to determine which subrecipient will receive funds under the MOD.

Therefore, AACOG 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 AACOG has not yet published a draft MOD, we offer the following comments for the draft MOD:

A. Local Buyout and Acquisition Program:

Program guidelines for this 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. We strongly encourage We recommend that AACOG, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions. **Local program guidelines must be identical, no family should have unequal access to disaster recovery simply because of where they live.**

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; to ensure that they can actually move to a safer area. 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.

AACOG’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. AACOG should be particularly careful that they are not using a program that provides lesser benefits to serve communities and homeowners of color.

AACOG should also consider whether its allocation formula and threshold factors are effectively targeting the areas of highest risk, and not simply making sure every jurisdiction gets the minimum amount, regardless where damage is concentrated. The MOD should focus on ensuring that the highest risk communities are moved to safety, versus each jurisdiction buying out a handful of homes.
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. 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.

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 AACOG 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.
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 AACOG 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 are concerned that the data and formula used to determine unmet need results in a distribution that does not accurately reflect the critical needs of low to moderate income populations. Using the methodology provided by HUD and GLG will not include the severity of damage suffered by low-income homeowners and will 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 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.
2015 Pew Charitable Trust study found that less than half (45%) of American households have even one month’s income in savings in case of an emergency. Lower income households are in an even more precarious situation, with only two weeks of savings. Those at the bottom of the income scale could only survive 9 days on their liquid assets. The study also indicates that even middle-income households could only scrape together about four months of income; it has been nearly 10 months since Hurricane Harvey.

Pew also looked at disparities in liquid savings among various racial and ethnic groups and found that,

[The typical white household has slightly more than one month’s income in liquid savings, compared with just 12 days for the typical Hispanic household and only five days for the typical African-American household. In fact, a quarter of black households would have less than $5 if they liquidated all of their financial assets, compared with $199 and $3,000 for the bottom 25 percent of Hispanic and white households, respectively.]

In addition, median white wealth is twelve times median black wealth, a disparity that can be traced to the history of segregation and discrimination in the United States, from government redlining to current lending discrimination.

The primary purpose of the CDBG program is to benefit LMI populations, yet the HUD methodology the State, and therefore AACOG, is 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 AACOG would budget 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. AACOG’s use of FVL 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 AACOG 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 AACOG's work on the action plan and disaster recovery, and we look forward to seeing your final MOD. Please let us know if we can provide further information or be helpful in any way.

Madison Sloan
Director, Disaster Recovery and Fair Housing Project
Texas Appleseed
msloan@texasappleseed.net
512-473-2800 ext. 108
From: Disaster  
Sent: Friday, July 13, 2018 4:12 PM  
To: 'Amelia Adams'  
Subject: RE: Method of Distribution Question

For the Damage Reports for the Housing Buyout and Acquisition Program, we counted the number of FEMA Individual Assistance applications and Small Business Administration home loan applications from residents of Karnes, Comal, and Guadalupe County.

For Damage Reports for the Local Infrastructure Program, we counted the number of Public Assistance requests submitted by local governments from Comal, Guadalupe, and Karnes Counties.

For repeat disasters, we counted the number of times the county was included in a federal disaster declaration since 2015. We applied the same number for both the Housing and Infrastructure Program. Comal and Guadalupe have been included in 3 federal disaster declarations (including Hurricane Harvey since 2015). Karnes County was only included in 1. For any town/city in those counties, we used the same number for that county.

I hope that answers your question.

Stella

From: Amelia Adams [mailto:amelia@texashousing.org]  
Sent: Friday, July 13, 2018 1:08 PM  
To: Disaster <disaster_recovery@aacog.com>  
Subject: Re: Method of Distribution Question

I'm sorry! I meant AACOG!

On Fri, Jul 13, 2018 at 8:43 AM, Disaster <disaster_recovery@aacog.com> wrote:

Sorry for the delay in my response. Are you asking about the BVCOG or AACOG MOD?

Stella

Stella E. Garcia, PhD

Senior Director of Operations

Alamo Area Council of Governments

8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221

(210) 362-5252 direct
(210) 428-0347 cell

Celebrating 50 Years ofUniting the Region

Please take a moment to complete the AACOG Customer Satisfaction Survey.

From: Amelia Adams [mailto:amelia@texashousing.org]
Sent: Wednesday, July 11, 2018 5:35 PM
To: Disaster <disaster_recovery@aacog.com>
Subject: Method of Distribution Question

Hi Ms. Garcia,

I was wondering where the data used in the BVCOG MOD comes from. Specifically, what is the source for the repeat disasters and damage reports?

Thanks!

Amelia
Outreach and Contacts
The Alamo Area Council of Governments is accepting nominations for the 2018 Regional Awards.

Any person, corporation, government project, or governmental project that has contributed to the significant positive advancement of the region and for any reason connected to the Alamo Area.

Nomination Categories:
- Regional Citizen of the Year
- Corporate/Business Person of the Year
- Community/Non-Profit Project of the Year
- Governmental Project of the Year
- Lifetime Achievement Award (Not Awarded Every Year)

You can view the form here.

For more information contact Vanessa Gallegos
(210) 339-1101 ext. 2423
vgallegos@aacog.com

Hurricane Harvey Disaster Recovery Solicitation for Public Comment

AACOG has developed a method of distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant. A solicitation totaling $4.667 million for the flood disaster-affected counties—Bexar, Comal, and Wilson—was released. Current elected officials and public sector employees are invited to attend the consultation, unless otherwise provided in a governmental regional project.

Nominations are due by 11:59 PM on October 1, 2018.

For more information on nominating an AACOG member, click here.

For more information, please contact Vanessa Gallegos at (210) 339-5580 or vgallegos@aacog.com

A public hearing was held in San Antonio on June 18, 2018, to solicit feedback on the development of the MOD. A public hearing was held in Seguin on July 6, 2018, to solicit feedback on the MOD and solicitations.

The MOD can be found here, and the application form is here. AACOG has reopened the public comment for the next 14 calendar days, through Monday, September 10, 2018, at 5:00 pm. We encourage you to review the MOD and solicitations. You may submit your comments to disaster_recovery@aacog.com.
Here is screen shot of the email I sent to the individuals on the attached distribution list. I sent via “bcc” to the individuals to avoid a reply all situation. This email is saved in my Disaster Recovery folder and will be available for any to review if audited/monitored.

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Good afternoon stakeholders,

The Alamo Area Council of Governments (AACOG) has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) allocations totaling $5,582,165 for the three disaster-identified counties — Comal, Guadalupe, and Hidalgo. AACOG created the MOD for a Housing Recovery & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds in a structured manner, emphasize a focus on the permanent restoration of infrastructure, and use local buyout and acquisition of land and property to remove hurricane Harvey sweptaway out of harm’s way.

A Public Planning Meeting was held in Kames City on June 18, 2018, to solicit feedback on the development of the MOD and a Public Hearing was held in Seguin on July 6, 2018 to solicit feedback on the MOD and allocations. The MOD and allocations are attached, they can also be found on our website www.aacog.com.

AACOG has reopened the public comment for 14 calendar days (August 27, 2018 through September 10, 2018). You may submit your comments to disaster_recovery@aacog.com. Please also feel free to share this with other interested stakeholders by forwarding this email, posting to your website or social media and posting at your place of business.

The AACOG Board of Directors is expected to review the MOD and consider public comments received during its monthly Board of Directors meeting scheduled for Wednesday, September 26, 2018.

Feel free to reach out to me if you would like to schedule some time to review this in more detail or just want more information about it.

Thank you!

Stella Garcia, Ph.D.
Senior Director of Operations
Alamo Area Council of Governments
7700 Sesame Drive, Suite 360
San Antonio, Texas 78217-6211
(210) 363-3122 direct
(210) 438-6547 extension

---
Stella Garcia

From: Stella Garcia
Sent: Tuesday, August 28, 2018 2:06 PM
To: "kallen@hillcountry.org"; "Janet.Brunette@bluebonnetmhmr.org"; "beckyy@caminoreals.org"
Subject: FW: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened
Attachments: COG MOD Summary Form- 4-18-18_aacog_revision 1_August 6 2018.pdf; HarveyMODAAllocationSummary 4-19-18_aacog1_Revision 1_August 6 2018.xlsx

Good afternoon!

I wanted to be sure that your organizations were aware of a Method of Distribution that the Alamo Area Council of Governments (AACOG) has developed for Community Development Block Grant Disaster Recovery (CDBG DR) funds for housing and infrastructure. Please see email below. Feel free to call upon me if you would like more information about this.

Thank you!

Stella

From: Stella Garcia
Sent: Monday, August 27, 2018 12:41 PM
Subject: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened

Good afternoon stakeholders,

The Alamo Area Council of Governments (AACOG) has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling $5,682,165 for the three disaster identified counties — Comal, Guadalupe, and Karnes. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds to foster long-term recovery, emphasize a focus on the permanent restoration in infrastructure, and to use local buyout and acquisition of land and property to remove Hurricane Harvey survivors out of harm’s way.

A Public Planning Meeting was held in Karnes City on June 18, 2018, to solicit feedback on the development of the MOD, and a Public Hearing was held in Seguin on July 6, 2018 to solicit feedback on the MOD and allocations. The MOD and allocations are attached; they can also be found on our website: www.aacog.com

AACOG has reopened the public comment for 14 calendar days (August 27, 2018 through September 10, 2018). You may submit your comments to disaster_recovery@aacog.com. Please also feel free to share this with other interested stakeholders by forwarding this email, posting to your website or social media, and/or posting at your place of business.

The AACOG Board of Directors is expected to review the MOD and consider public comments received during its monthly Board of Directors meeting scheduled for Wednesday, September 26, 2018.

Feel free to reach out to me if you would like to schedule some time to review this in more detail or just want more information about it.

Thank you!
Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell

Celebrating 50 Years of Uniting the Region

Please take a moment to complete the AACOG Customer Satisfaction Survey.
Good morning Ms. Tamez,

I wanted to be sure that your organization was aware of a Method of Distribution that the Alamo Area Council of Governments (AACOG) has developed for Community Development Block Grant Disaster Recovery (CDBG DR) funds for housing and infrastructure. Please see email below. Feel free to call upon me if you would like more information about this.

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Stella

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Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell

Celebrating 50 Years ofUniting the Region

Please take a moment to complete the AACOG Customer Satisfaction Survey.
Contact Us

Thank you for contacting MALDEF. We appreciate your feedback on the work that we are doing. This account is checked daily, and your email will be forwarded to the appropriate office and department at the organization.

If you are a press outlet and you are on deadline, please contact Samantha Hernandez at (019) 656-0575.

Once again, thank you for contacting MALDEF and letting us know what is important to you as a member of our community.
## AACOG Method of Distribution
### Email Distribution List

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Email address</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City of New Braunfels</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Robin Shellard</td>
<td>Interim Grants Administrator/Finance</td>
<td><a href="mailto:rshellard@nbtexas.org">rshellard@nbtexas.org</a></td>
</tr>
<tr>
<td>Matthew Eckmann</td>
<td>Real Estate Manager</td>
<td><a href="mailto:meckmann@nbtexas.org">meckmann@nbtexas.org</a></td>
</tr>
<tr>
<td>Andrew Cardiel</td>
<td>Emergency Management Coordinator/Fire</td>
<td><a href="mailto:acardiel@nbtexas.org">acardiel@nbtexas.org</a></td>
</tr>
<tr>
<td>Garry Ford, P.E.</td>
<td>City Engineer</td>
<td><a href="mailto:gford@nbtexas.org">gford@nbtexas.org</a></td>
</tr>
<tr>
<td>Nancy Davison</td>
<td>CDBG Manager City of New Braunfels</td>
<td><a href="mailto:ndavison@nbtexas.org">ndavison@nbtexas.org</a></td>
</tr>
<tr>
<td><strong>City of Seguin</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Don Faseler</td>
<td>Seguin City Manager</td>
<td><a href="mailto:dfaseler@seguintexas.gov">dfaseler@seguintexas.gov</a></td>
</tr>
<tr>
<td>Dana Losey</td>
<td>Seguin Grants Administrator</td>
<td><a href="mailto:dlosey@seguintexas.gov">dlosey@seguintexas.gov</a></td>
</tr>
<tr>
<td>Kayla Kappelmann</td>
<td>Events Complex Coordinator</td>
<td><a href="mailto:kkappelmann@seguintexas.gov">kkappelmann@seguintexas.gov</a></td>
</tr>
<tr>
<td><strong>Comal County</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Brenda Ritzen</td>
<td>Environmental Health Coordinator</td>
<td><a href="mailto:Contact2@co.comal.tx.us">Contact2@co.comal.tx.us</a></td>
</tr>
<tr>
<td>Sherman Krause</td>
<td>Comal County Judge</td>
<td><a href="mailto:krause@co.comal.tx.us">krause@co.comal.tx.us</a></td>
</tr>
<tr>
<td>Kathy Griffin</td>
<td>Floodplain Coordinator</td>
<td><a href="mailto:Contact2@co.comal.tx.us">Contact2@co.comal.tx.us</a></td>
</tr>
<tr>
<td>Tom Hornseth, P.E.</td>
<td>County Engineer</td>
<td><a href="mailto:rabthh@co.comal.tx.us">rabthh@co.comal.tx.us</a></td>
</tr>
<tr>
<td>Jeff Kelley</td>
<td>Emergency Management Coordinator</td>
<td><a href="mailto:kellej@co.comal.tx.us">kellej@co.comal.tx.us</a></td>
</tr>
<tr>
<td>Michelle Valadez</td>
<td>Grants Coordinator</td>
<td><a href="mailto:valadm@co.comal.tx.us">valadm@co.comal.tx.us</a></td>
</tr>
<tr>
<td><strong>Karnes County</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Mary Lozano</td>
<td>Karnes County Commissioner, Pct 3</td>
<td><a href="mailto:m.lozano@co.karnes.tx.us">m.lozano@co.karnes.tx.us</a></td>
</tr>
<tr>
<td>Walter Long</td>
<td>Karnes County Judge</td>
<td><a href="mailto:walter.long@co.karnes.tx.us">walter.long@co.karnes.tx.us</a></td>
</tr>
<tr>
<td>Robert Ebroms</td>
<td>Karnes County Chief Deputy Sheriff</td>
<td><a href="mailto:Robert.ebroms@co.karnes.tx.us">Robert.ebroms@co.karnes.tx.us</a></td>
</tr>
<tr>
<td>Dwayne Villanueva</td>
<td>Karnes County Sheriff</td>
<td><a href="mailto:Dwayne.villanueva@co.karnes.tx.us">Dwayne.villanueva@co.karnes.tx.us</a></td>
</tr>
<tr>
<td>Shelby Dupnik</td>
<td>Karnes County Commissioner, Pct 1 and Emergency Management Coordinator</td>
<td><a href="mailto:Shelby.dupnik@co.karnes.tx.us">Shelby.dupnik@co.karnes.tx.us</a></td>
</tr>
<tr>
<td></td>
<td>Karnes County</td>
<td><a href="mailto:mbhoudmann@yahoo.com">mbhoudmann@yahoo.com</a></td>
</tr>
<tr>
<td><strong>City of Karnes City</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Bob Evans</td>
<td>Karnes City Manager</td>
<td><a href="mailto:revans@cityofkc.tx.com">revans@cityofkc.tx.com</a></td>
</tr>
<tr>
<td><strong>City of Runge</strong></td>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Homer Lott</td>
<td>Runge Mayor</td>
<td><a href="mailto:patronlott@att.net">patronlott@att.net</a></td>
</tr>
<tr>
<td>Esmeralda</td>
<td>Runge City Secretary</td>
<td><a href="mailto:Cityofrunge@sbcglobal.net">Cityofrunge@sbcglobal.net</a></td>
</tr>
</tbody>
</table>
## AACOG Method of Distribution
### Email Distribution List

<table>
<thead>
<tr>
<th>City of Kenedy</th>
<th></th>
<th><a href="mailto:barbarashaw@cityofkenedy.org">barbarashaw@cityofkenedy.org</a></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Guadalupe Blanco River Authority (GBRA)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Darrell Nichols</td>
<td>Senior Deputy General Manager, Guadalupe-Blanco River Authority</td>
<td><a href="mailto:dnichols@gbra.org">dnichols@gbra.org</a></td>
</tr>
<tr>
<td>Jonathon Stinson</td>
<td>Deputy General Manager, GBRA</td>
<td><a href="mailto:jstinson@gbra.org">jstinson@gbra.org</a></td>
</tr>
<tr>
<td><strong>Fair Housing Organizations/Organizations that Represent Protected Classes</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sandra Tamez</td>
<td>Executive Director of Fair Housing Council of Greater San Antonio</td>
<td><a href="mailto:sandra@myfairhousing.org">sandra@myfairhousing.org</a></td>
</tr>
<tr>
<td>Bernardo Ramirez</td>
<td>National Association of Latino Community Asset Builders (NALCAB)</td>
<td><a href="mailto:bramirez@nalcab.org">bramirez@nalcab.org</a></td>
</tr>
<tr>
<td>Oliver Hill</td>
<td>San Antonio Branch NAACP</td>
<td><a href="mailto:sanaacp@satx.rr.com">sanaacp@satx.rr.com</a></td>
</tr>
<tr>
<td>Wanda Rosales</td>
<td>LULAC Council Number: 682 District: 2 Location: Seguin, TX 78155</td>
<td><a href="mailto:wandarosales1955@gmail.com">wandarosales1955@gmail.com</a></td>
</tr>
<tr>
<td>Ann Zaragoza</td>
<td>Texas Rural Legal Aid</td>
<td><a href="mailto:azaragoza@trla.org">azaragoza@trla.org</a></td>
</tr>
<tr>
<td>Steven R. Sanchez</td>
<td>LULAC Council Number: 4217 District: 2 Location: New Braunfels, TX 78130</td>
<td><a href="mailto:lulac4217@yahoo.com">lulac4217@yahoo.com</a></td>
</tr>
<tr>
<td>MALDEF (Mexican American Legal Defense and Education Fund)</td>
<td>Called to get email address and did not get a return address; sent notice via web “contact us”</td>
<td>Sent via website (see print screens)</td>
</tr>
<tr>
<td><strong>Housing Authorities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nadine Mardock</td>
<td>New Braunfels Housing Authority</td>
<td><a href="mailto:nmardock@nbhatx.org">nmardock@nbhatx.org</a></td>
</tr>
<tr>
<td>Brenda Edwards</td>
<td>Seguin Housing Authority</td>
<td><a href="mailto:bedwards@seguinha.org">bedwards@seguinha.org</a></td>
</tr>
<tr>
<td>Mynette Benedict</td>
<td>Schertz Housing Authority</td>
<td><a href="mailto:schertzha1@satx.rr.com">schertzha1@satx.rr.com</a></td>
</tr>
<tr>
<td>Name</td>
<td>Organization</td>
<td>Email Address</td>
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<tr>
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<tr>
<td>Cristi Lajeunesse</td>
<td>Kenedy Housing Authority</td>
<td><a href="mailto:khatex@kenedyhousing.info">khatex@kenedyhousing.info</a></td>
</tr>
<tr>
<td>Mary Culpepper</td>
<td>Falls City Housing Authority</td>
<td><a href="mailto:fcpha@sbcglobal.net">fcpha@sbcglobal.net</a></td>
</tr>
<tr>
<td>Pablo Nunez</td>
<td>Runge Housing Authority</td>
<td><a href="mailto:rha@karnesec.net">rha@karnesec.net</a></td>
</tr>
<tr>
<td>Gilbert Piette</td>
<td>Prospera Housing and Community Services Organization</td>
<td><a href="mailto:patty@prosperahcs.org">patty@prosperahcs.org</a></td>
</tr>
<tr>
<td>Health and Human Services/Community Services Organizations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bobby Deike</td>
<td>Community Council of South Central Texas</td>
<td><a href="mailto:bdeike@ccsct.org">bdeike@ccsct.org</a></td>
</tr>
<tr>
<td>Michael Weaver</td>
<td>Regional Director, Health and Human Services (Region 8)</td>
<td><a href="mailto:michael.weaver@hhsc.state.tx.us">michael.weaver@hhsc.state.tx.us</a></td>
</tr>
<tr>
<td>Esther Rodriguez</td>
<td>Program Manager (Region 8)</td>
<td><a href="mailto:esther.rodriguez@hhsc.state.tx.us">esther.rodriguez@hhsc.state.tx.us</a></td>
</tr>
<tr>
<td>Keely Lee</td>
<td>Texas Department of Health and Human Services</td>
<td><a href="mailto:Keely.Lee@hhsc.state.tx.us">Keely.Lee@hhsc.state.tx.us</a></td>
</tr>
<tr>
<td>Economic/Community Development Organizations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Josh Schneuker</td>
<td>Seguin EDC</td>
<td><a href="mailto:jschneuker@seguintexas.gov">jschneuker@seguintexas.gov</a></td>
</tr>
<tr>
<td>Christopher Looney</td>
<td>New Braunfels Planning and Community Development</td>
<td><a href="mailto:clooney@nbtexas.org">clooney@nbtexas.org</a></td>
</tr>
<tr>
<td>Meagen Dennison</td>
<td>Texas Agrilife Extension Service</td>
<td><a href="mailto:Karnes-tx@tamu.edu">Karnes-tx@tamu.edu</a></td>
</tr>
<tr>
<td>Sherry Mosier</td>
<td>Bulverde Spring Branch EDF</td>
<td><a href="mailto:sherry.mosier@bsbedf.com">sherry.mosier@bsbedf.com</a></td>
</tr>
<tr>
<td>Mark Luft</td>
<td>Cibolo EDC</td>
<td><a href="mailto:mluft@cibolotx.gov">mluft@cibolotx.gov</a></td>
</tr>
<tr>
<td>Chambers of Commerce</td>
<td></td>
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</tr>
<tr>
<td>Amelia Martinez</td>
<td>Karnes City Chamber of Commerce</td>
<td><a href="mailto:karnescitychamber@att.net">karnescitychamber@att.net</a></td>
</tr>
<tr>
<td>Jolene Terwillinger</td>
<td>Kenedy Chamber of Commerce</td>
<td><a href="mailto:kenedycc@outlook.com">kenedycc@outlook.com</a></td>
</tr>
<tr>
<td>Guadalupe County</td>
<td></td>
<td></td>
</tr>
<tr>
<td>James Wolverton</td>
<td>Guadalupe County Commissioner</td>
<td><a href="mailto:wolverton@co.guadalupe.tx.us">wolverton@co.guadalupe.tx.us</a></td>
</tr>
<tr>
<td>Trish Tumlinson</td>
<td>Guadalupe County Commissioners Court Administrator</td>
<td><a href="mailto:trish.tumlinson@co.guadalupe.tx.us">trish.tumlinson@co.guadalupe.tx.us</a></td>
</tr>
<tr>
<td>Patrick Pinder</td>
<td>Fire Marshall/EMC Guadalupe County</td>
<td><a href="mailto:patrick.pinder@co.guadalupe.tx.us">patrick.pinder@co.guadalupe.tx.us</a></td>
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<tr>
<td>City of Santa Clara</td>
<td></td>
<td></td>
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<tr>
<td>Jeff Hunt</td>
<td>Mayor of Santa Clara</td>
<td><a href="mailto:mayor@cisantaclaratx.us">mayor@cisantaclaratx.us</a></td>
</tr>
<tr>
<td>Area School Districts</td>
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<td></td>
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</table>
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<table>
<thead>
<tr>
<th>Name</th>
<th>Position/Location</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew Kim</td>
<td>Comal ISD Superintendent</td>
<td><a href="mailto:Andrew.kim@comalisd.org">Andrew.kim@comalisd.org</a></td>
</tr>
<tr>
<td>Dr. Greg Gibson</td>
<td>Schertz-Cibolo-Universal City ISD</td>
<td><a href="mailto:ggibson@scuc.txed.net">ggibson@scuc.txed.net</a></td>
</tr>
<tr>
<td>Ms. Kelly Walters</td>
<td>Marion ISD</td>
<td><a href="mailto:kwalters@marionisd.net">kwalters@marionisd.net</a></td>
</tr>
<tr>
<td>Dr. Norman Hall</td>
<td>Richard Milburn Academy</td>
<td><a href="mailto:nhall@rma-tx.org">nhall@rma-tx.org</a></td>
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**MHMR/Local Mental Health Organizations**

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<th>Name</th>
<th>Position/Location</th>
<th>Email Address</th>
</tr>
</thead>
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<tr>
<td>Kent Allen</td>
<td>Director of Service Coordination</td>
<td><a href="mailto:kallen@hillcountry.org">kallen@hillcountry.org</a></td>
</tr>
<tr>
<td></td>
<td>Hill Country Community MHDD Centers (Comal)</td>
<td></td>
</tr>
<tr>
<td>Janet Brunette,</td>
<td>Director of DDR Essential Services</td>
<td><a href="mailto:Janet.Brunette@bluebonnetmhmr.org">Janet.Brunette@bluebonnetmhmr.org</a></td>
</tr>
<tr>
<td></td>
<td>(Guadalupe) Bluebonnet Trails Community Services</td>
<td></td>
</tr>
<tr>
<td>Becky Ynclan</td>
<td>Intellectual and Developmental Disabilities Director (Karnes)</td>
<td><a href="mailto:beckyy@caminorealcs.org">beckyy@caminorealcs.org</a></td>
</tr>
<tr>
<td></td>
<td>Camino Real Community Services</td>
<td></td>
</tr>
</tbody>
</table>

**Entities/Individuals who Commented during first 14 Calendar Public Comment Period**

<table>
<thead>
<tr>
<th>Name</th>
<th>Position/Location</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Madison (Maddie) Sloan</td>
<td>Director, Disaster Recovery and Fair Housing Project Texas Appleseed</td>
<td><a href="mailto:msloan@texasappleseed.net">msloan@texasappleseed.net</a></td>
</tr>
<tr>
<td>Amelia Adams</td>
<td>Community Planner, Fair Housing and Disaster Recovery Analyst Texas Housers</td>
<td><a href="mailto:amelia@texashousing.org">amelia@texashousing.org</a></td>
</tr>
</tbody>
</table>

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Page 4