October 3, 2018

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

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

Dear Mr. Brannan:

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

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

1. As part of the application process, subrecipients are required to hold a public hearing and conduct outreach to local governments; housing advocacy organizations; faith-based organizations; community groups representing protected classes and vulnerable populations; groups interested in fair housing issues; and limited English proficient (LEP) persons.

2. Acceptance of the MOD does not indicate eligibility or approval of funding for any proposed projects.

3. GCRPC’s allocation must meet the requirement that 70 percent of funds benefit low- to moderate-income persons. Projects that do not meet HUD’s national objective for benefitting low- to moderate-income persons may not be approved until this allocation requirement is met.
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,

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

cc: Michael Ada, Director, GCRPC
Alexandra Gamble, Manager, Policy Development, GLO-CDR
Shawn Strange, Program Manager, Policy Development, GLO-CDR
Zachary Stern, Planner, Policy Development, GLO-CDR
Christopher Smith, Planner, Policy Development, GLO-CDR
MOD Summary Form
Golden Crescent Regional Planning Commission (RPC) Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information

Contact Information
Regional Planning Commission (RPC):
Golden Crescent Regional Planning Commission (GCRPC)

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

Principal Contact Telephone:
361-578-1587

Principal Contact Email:
michaela@gcrpc.org

Principal Contact Address:
1908 N. Laurent, Suite 600

City, State, Zip:
Victoria, Texas 77901

Allocation Summary
Regional Allocation for All Programs: $54,475,236
Local Buyout and Acquisition Program Total: $18,430,647
Local Infrastructure Program Total: $36,044,589

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

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

Date/Time: 6/18/2018 – 6:00 PM  
Location: Victoria Tower Conference Room, 1908 N. Laurent, 2nd Floor, Victoria, Texas 77901
Attendance: 5

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>6/7/2018</td>
<td>See Attachments.</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>RPC Website</td>
<td>6/4/2018 - Continuous</td>
<td><a href="http://www.gcrpc.org">www.gcrpc.org</a></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>Various</td>
<td>Beginning 6/3/2018</td>
<td>See Attachments.</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).

<table>
<thead>
<tr>
<th>Description</th>
<th>Accommodations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Notices were published in English and Spanish. Additionally,</td>
<td>GCRPC offered accommodations for those with modified communication needs upon timely request.</td>
</tr>
<tr>
<td>GCRPC offered accommodations for those with modified communication needs</td>
<td></td>
</tr>
<tr>
<td>upon timely request.</td>
<td></td>
</tr>
</tbody>
</table>
Second Public Hearing Information

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

Attendance: 5  
Public Planning Meeting: ✗

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

<table>
<thead>
<tr>
<th>Method</th>
<th>Date Sent</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Mail</td>
<td>6/7/2018</td>
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</tbody>
</table>

Fax  
Hand Delivery  
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<tr>
<td>🔺</td>
<td>A summary of the citizen comments, responses, and meeting discussion is attached.</td>
<td></td>
</tr>
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</table>

Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages.
Long-Term Planning and Recovery
Below is an explanation of how the RPC’s method of distribution fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing and the local economy and primarily, how these activities will contribute to the long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

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

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

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

Similarly, funding allocated to the GCRPC region for the Local Infrastructure Program may be utilized by eligible counties and cities for all eligible local infrastructure activities that adhere to GLO and HUD guidelines. This approach provides entities with maximum flexibility to develop customized Local Infrastructure programs to address any unmet infrastructure needs unique to their respective communities. Local control local control will ensure long-term recovery and housing restoration efforts in the HUD-identified most impacted and distressed areas and/or other impacted areas 1) align with local, state, and federal guidelines; and 2) prioritize the use of funding according to local infrastructure needs.
Affirmatively Furthering Fair Housing Statement
All subrecipients will certify that they will affirmatively further fair housing ("AFFH") in their grant agreements, and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval of projects. Such review will include assessment of a proposed project’s area demography, socioeconomic characteristics, housing configuration and needs, educational, transportation, and health care opportunities, environmental hazards or concerns, and all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

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

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

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

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

Distribution Factors
The RPC has selected the following distribution factors:

<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>Unmet Need + Resiliency</td>
<td>50</td>
<td>U.S. Census Bureau; FEMA; GLO SAP</td>
<td>See Attached Narrative.</td>
</tr>
<tr>
<td>1+ (Raw SoVI – Min Raw SoVI)</td>
<td>40</td>
<td>GLO SAP; Dr. Christopher Emrich, University of Central Florida</td>
<td>See Attached Narrative.</td>
</tr>
<tr>
<td>Unmet Need Per Capita</td>
<td>10</td>
<td>U.S. Census Bureau; FEMA</td>
<td>See Attached Narrative.</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 Disastery Recovery: Hurricane Harvey (Section IV.F.2.d).

The RPC has addressed prioritization of eligible activities as follows:

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

-OR-

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

**Distribution Factors**
The RPC has selected the following distribution factors:

<table>
<thead>
<tr>
<th>Distribution Factor*</th>
<th>Weight</th>
<th>Documentation Source</th>
<th>Explanation of Factor Selection and Weighting</th>
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<tr>
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</tr>
<tr>
<td>1 + (Raw SoVI – Min Raw SoVI)</td>
<td>40</td>
<td>GLO SAP; Dr. Christopher Emrich, University of Central Florida</td>
<td>See Attached Narrative.</td>
</tr>
</tbody>
</table>
Unmet Need Per Capita | 10 | U.S. Census Bureau; FEMA | See Attached Narrative.

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

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

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

The RPC has addressed prioritization of eligible activities as follows:

| ☒ | The RPC has chosen not to limit Grantees in the region to projects meeting regional priority activities. |

-OR-

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

- ☐ Water Facilities
- ☐ Sewer Facilities
- ☐ Other Public Utilities (gas, et al)
- ☐ 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 Disastery Recovery: Hurricane Harvey (Section IV.F.7.e) and should be referenced accordingly.

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

Signature: Joe Brannan
Printed Name: Joe Brannan
Email Address: jbrannan@gerpc.org

08/7/2018
Date

Executive Director
Title

361-578-1587
Telephone Number
The GCRPC was tasked by the GLO to develop methods of distribution (MOD) for Hurricane Harvey, CDBG-DR funds for the state’s Local Buyout and Acquisition Program (LBAP) and Local Infrastructure Program (LIP). The GCRPC will implement a funding distribution scheme based on the analysis and methodology utilized by the GLO in its distribution of CDBG-DR funds to the regions within the Hurricane Harvey declared disaster areas. See State Action Plan, Regional Methods of Distributions: XI. Appendix F, pp 118-128. Baseline funding amounts, to be distributed amongst eligible entities throughout the region, have been provided by the GLO. Amounts allocated to HUD Most Impacted Areas (80%) and State Most Impacted Areas (20%) for LBAP and LIP are not subject to change.

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

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

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

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

**Local Buyout and Acquisition Program (LBAP) FACTORS:**

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

- **State Most Impacted Areas (20%)**
  - County or City Population
  - Median Value of Housing Units for Homeowners/Median Value of Constructing Rental Unit for Renters
  - FEMA Verified Count of Unmet Need—Major/Low Damage Severity
  - FEMA Verified Count of Unmet Need—Major/High Damage Severity
  - FEMA Verified Count of Unmet Need—Severe Damage
  - Total FEMA Verified Count of Unmet Need Units
  - Unmet Need $ Amount - Derived Using Severity Levels
  - 15% Resiliency
  - Unmet Need $ Amount + (plus) 15% Resiliency - Derived Using Severity Levels
  - Unmet Need + (plus) Resiliency Removing Any Overlap
  - Raw SoVI
  - Positive SoVI
  - Estimated Unmet Need + (plus) Resiliency Amount Per Capita
Resulting LBAP Distribution PERCENTAGES:

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

Local Infrastructure Program (LIP) FACTORS:

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

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

Resulting LIP Distribution PERCENTAGES:

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

A. State Housing Program Allocation

   1. State Homeowner Assistance Program Allocation
      a. Amount(s)

<table>
<thead>
<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
<th>LMI Amount (70% of Total Allocation)</th>
<th>Total</th>
<th>% of Total Regional Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeowner Assistance Program</td>
<td>$32,657,218</td>
<td>$23,281,471</td>
<td>$39,157,082</td>
<td>$55,938,689</td>
<td>50.66%</td>
</tr>
</tbody>
</table>
b. **Method of Distribution** – Not Applicable
   i. The Texas General Land Office (GLO) will directly manage and administer the Homeowner Assistance Program for the Golden Crescent Regional Planning Commission (GCRPC) region. Additional information regarding purpose, scope, eligibility, and applying for assistance will be provided by the GLO.


2. **Local Buyout and Acquisition Program (LBAP) Allocation**
   a. **Amount(s)**

<table>
<thead>
<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
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<th>Total</th>
<th>% of Total Regional Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Buyout/Acquisition Program</td>
<td>$8,606,577</td>
<td>$9,824,070</td>
<td>$12,901,453</td>
<td>$18,430,647</td>
<td>16.69%</td>
</tr>
</tbody>
</table>

b. **Method of Distribution Detail** – see Attachment 2 – LBAP MOD Detail.

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

B. **Local Infrastructure Program (LIP) Allocation**
   a. **Amount(s)**

<table>
<thead>
<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
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<th>Total</th>
<th>% of Total Regional Allocation</th>
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<tbody>
<tr>
<td>Local Infrastructure Program</td>
<td>$18,426,069</td>
<td>$17,618,520</td>
<td>$25,231,212</td>
<td>$36,044,589</td>
<td>32.64%</td>
</tr>
</tbody>
</table>

b. **Method of Distribution Detail** – see Attachment 3 – LIP MOD Detail

c. **Reallocation** – “Reallocation of [LIP] funds from de-obligated funds and/or cost savings from completed projects will be [at] the discretion of the GLO within the region[].” Please see Page 87 of 203 of the *SAP, April 6, 2018*, available at [http://www.glo.texas.gov/recovery/reports/action-plans/index.html](http://www.glo.texas.gov/recovery/reports/action-plans/index.html).
## Local Buyout and Acquisition Program (LBAP) Distribution

<table>
<thead>
<tr>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties &amp; Zip Codes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Victoria County</strong> <em>(Excluding City of Victoria)</em></td>
</tr>
<tr>
<td><strong>City of Victoria</strong></td>
</tr>
<tr>
<td><strong>77979 Calhoun County</strong> <em>(Excluding City of Port Lavaca)</em></td>
</tr>
<tr>
<td>*<em>City of Port Lavaca (77979)</em></td>
</tr>
<tr>
<td><strong>80% LBAP Sub-total</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Initial 20% Allocation of Funds for HUD Impacted Counties</th>
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<tbody>
<tr>
<td><strong>Calhoun County</strong></td>
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<td><strong>DeWitt County</strong></td>
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<td><strong>Lavaca County</strong></td>
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<tr>
<td><strong>20% LBAP Sub-Total</strong></td>
</tr>
</tbody>
</table>

**GCRPC LBAP Grand Total(s)** $18,430,647

## Local Infrastructure Program (LIP) Distribution

<table>
<thead>
<tr>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties &amp; Zip Codes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Victoria County</strong> <em>(Excluding City of Victoria)</em></td>
</tr>
<tr>
<td><strong>City of Victoria</strong></td>
</tr>
<tr>
<td><strong>77979 Calhoun County</strong> <em>(Excluding City of Port Lavaca)</em></td>
</tr>
<tr>
<td>*<em>City of Port Lavaca (77979)</em></td>
</tr>
</tbody>
</table>
**LIP Distribution – Continued**

<table>
<thead>
<tr>
<th>County</th>
<th>Allocation Details</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Calhoun County</strong></td>
<td>(Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)</td>
<td>$2,196,247</td>
</tr>
<tr>
<td><strong>City of Point Comfort</strong></td>
<td></td>
<td>$1,031,252</td>
</tr>
<tr>
<td><strong>City of Seadrift</strong></td>
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<td>$1,536,581</td>
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<tr>
<td><strong>DeWitt County</strong></td>
<td>(Excluding City of Cuero, City of Yoakum, and City of Yorktown)</td>
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</tr>
<tr>
<td><strong>City of Cuero</strong></td>
<td></td>
<td>$1,426,977</td>
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<tr>
<td><strong>City of Yoakum</strong></td>
<td></td>
<td>$1,416,383</td>
</tr>
<tr>
<td><strong>City of Yorktown</strong></td>
<td></td>
<td>$793,105</td>
</tr>
<tr>
<td><strong>Goliad County</strong></td>
<td>(Excluding City of Goliad)</td>
<td>$723,030</td>
</tr>
<tr>
<td><strong>City of Goliad</strong></td>
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<td>$477,108</td>
</tr>
<tr>
<td><strong>Gonzales County</strong></td>
<td>(Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)</td>
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<tr>
<td><strong>City of Gonzales</strong></td>
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<td>$852,300</td>
</tr>
<tr>
<td><strong>City of Nixon</strong></td>
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<td>$671,903</td>
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<tr>
<td><strong>City of Smiley</strong></td>
<td></td>
<td>$595,907</td>
</tr>
<tr>
<td><strong>City of Waelder</strong></td>
<td></td>
<td>$623,785</td>
</tr>
<tr>
<td><strong>Jackson County</strong></td>
<td>(Excluding City of Edna, City of Ganado, and City of La Ward)</td>
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</tr>
<tr>
<td><strong>City of Edna</strong></td>
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<td>$730,897</td>
</tr>
<tr>
<td><strong>City of Ganado</strong></td>
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<tr>
<td><strong>City of La Ward</strong></td>
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<tr>
<td><strong>Lavaca County</strong></td>
<td>(Excluding City of Hallettsville, City of Moulton, and City of Shiner)</td>
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<tr>
<td><strong>City of Hallettsville</strong></td>
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<tr>
<td><strong>City of Moulton</strong></td>
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<td>$263,295</td>
</tr>
<tr>
<td><strong>City of Shiner</strong></td>
<td></td>
<td>$272,693</td>
</tr>
</tbody>
</table>

Attachment 4 - LBAP and LIP MOD Data Sources

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

AS OF 7/10/2018
The GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution (MOD) allocates available funding in a manner similar to the methodology utilized by the GLO to distribute HUD CDBG-DR funding to regions throughout the affected area.

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

a. Unmet Need

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

i. Homeowner Unmet Need

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

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

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

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

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

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

ii. Renter Unmet Need
A similar procedure was used for renters. The HUD method provides damage category thresholds for renters based on the renter’s FEMA Verified Loss (FVL). FVL is based on a renter’s personal property loss. The HUD method does not, however, specify a multiplier for the damage severity categories for renters. Thus, the DTSV percentage estimates used for homeowners were also applied to renter damage severity categories (57.8% for the Major-Low Damage Severity category, 71.5% for the Major-High Damage Severity category, and 100% for the Severe Damage category).

For renters, in contrast to using the median value of a damaged home as the basis of the calculation, the construction cost of providing an 861 square feet rental unit with a footprint of 24’×35’ was utilized. This construction cost has a nationwide range of $64,575 to $86,100 per unit. The midpoint of $75,337.50 was used to represent the value of a total loss for a rental unit and the percentage in each severity category was applied to this value. The percentage multiplied by the rental unit construction cost values were then multiplied by the count of renters in the severity category to obtain an unmet need value for renters in each of the severity categories. Summing over severity categories yielded an estimate of unmet need to renters in the county, city, or ZIP code. The sum of unmet needs for homeowners and renters represents the total unmet need value for a county, city, or ZIP code.

b. Resiliency

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

c. Damage Data – County-ZIP Code Overlap

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

d. Social Vulnerability

Both HUD and the GLO recommended the use of a social vulnerability factor in determining the distribution of CDBG-DR funding. Thus, GCRPC has utilized the same Social Vulnerability Index data utilized by the GLO in its distribution of HUD CDBG-DR funds to the Hurricane Harvey impacted regions in Texas. The raw Social Vulnerability Index indices utilized by the GLO in its distribution of HUD funds to the 49 Hurricane Harvey impacted counties were obtained from Dr. Christopher Emrich at the University of Central Florida, a leading expert in the development of the Social Vulnerability Index (SoVI). Dr. Emrich is the Boardman Endowed Associate Professor of Environmental Science and Public Administration and a member of the National Center for Integrated Coastal Research at the University of Central Florida. Dr. Emrich completed the SoVI computations and supplied the SoVI scores for all of the 49 declared disaster counties to the GLO.
The Social Vulnerability Index (SoVI), was created by Cutter et al. (Cutter, S. L., Boruff, B. J., & Shirley, W. L. (2003). “Social vulnerability to environmental hazards,” Social Science Quarterly, 84(2), 242–261). The idea behind social vulnerability, and its relevance in the context of the distribution methodology presented here, is that social vulnerability arises from certain geographically identifiable population groups who have limited access to political power and resources; have certain physical limitations; or are bound by customs, social capital, beliefs, and characteristics of the built environment (such as density and infrastructure type, building age and stock, etc.). The idea of social vulnerability is that it makes the socially vulnerable people (here, counties, cities, or ZIP codes) more susceptible and less resilient to catastrophic events. Vulnerable groups are less likely to have the ability to respond and recover from catastrophic events on their own. The index is useful to quantify, describe, and understand the social burdens of risks, such as catastrophic natural disasters.

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

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

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

### e. Unmet Need Per Capita

An Unmet Need Per Capita factor was calculated to help represent the ability of a county, city, or ZIP code, population to sustain and/or recover from the disaster by raising or utilizing their own funds. This factor also helps account for differences in population between rural and urban areas. For each county, city, or ZIP code the unmet need per capita was calculated by dividing unmet need + (plus) resiliency by the population size.
The allocation of funds to eligible entities involved a weighted combination of 1) the unmet needs per county (or ZIP code), 2) the positive SoVI, and 3) the per capita unmet need for each county (or ZIP code). To facilitate this, a separate distribution percentage was determined for each of these three factors providing the distribution percentages that would be applicable (were this factor the only factor in consideration). These factor distributions in turn were subsequently combined to present a single percentage allocation distribution across all entities. The distributions for the 80% allocation and the 20% allocations were determined separately with the 80% group and the 20% group delineated by the Federal Register and the GLO’s Draft State Action Plan. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each eligible entity by taking the county or ZIP code’s unmet need plus resiliency score and dividing it by the sum of the unmet need plus resiliency scores over all eligible entities in the 80% allocation group.

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

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

A shortfall column displays the unmet need plus resiliency factor for a county or ZIP code versus the amount they would receive using the unconstrained 50-40-10 model dollar allocation. This
column presents how much under or over their unmet need the county or ZIP codes is by using the unconstrained 50-40-10 weighting allocation process.

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

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

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

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

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

g. Overlap – Avoiding Double Allocation

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

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

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

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

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

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

Additional allocation restrictions required consideration as a result of the minimum required allocation and the number of eligible entities. **An allocation that adheres to HUD and GLO requirements was achieved for the 20% Allocation group** by limiting the regional allocation, for the 20% Allocation group, to only eligible counties, while still providing for the continued LBAP eligibility of cities and eminent domain authority entities through partnerships with eligible counties, an allocation that adheres to HUD and GLO requirements was achieved.
As previously stated, in order to achieve an equitable distribution of the limited funding provided, final allocation amounts reflect the sum of the $1,000,000 floor plus the sum of the percentage distribution based on the 50-40-10 model; without reference to the “Allocation Amount Using the 50-40-10 Model Without Imposed Distributional Constraints” column. This provides all eligible entities with an allocation that reduces “Unmet Need Plus Resiliency Removing Any Overlap” totals in a more holistic, or regional, manner.

This allocation methodology will be performed in a sequential manner for any future CDBG-DR allocations with each round’s final allocation amount reducing the “Unmet Need Plus Resiliency Removing Any Overlap” amount for each eligible entity. As the spreadsheet shows, all eligible entities in the 20% allocation group did not reach their “Unmet Need Plus Resiliency Removing Any Overlap” amount in the first allocation.
Attachment 3 – LIP MOD Detail

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

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

a. Public Assistance

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

b. Unmet Need

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

c. Resiliency

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

d. Social Vulnerability

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

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

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

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

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

e. Unmet Need Per Capita

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

f. Distribution of Funds

The allocation of funds involved a weighted combination of 1) the unmet needs per county or city, 2) the positive SoVI, and 3) the per capita unmet need for each county. To facilitate this a separate distribution percentage was determined for each of these three factors which were subsequently combined for a single distribution percentage across all eligible counties/cities.
The initial distributions for the 80% allocation (HUD Most Impacted Counties) and the 20% allocations (Impacted Counties and Most Impacted ZIP Codes were determined through the guidance provided by the Federal Register and the GLO SAP. Thus, for the 80% allocation group the distribution percentage based on unmet need plus resiliency was calculated for each entity by taking 1) the county unmet need plus (+) resiliency and dividing (/) it by 2) the sum of the unmet need plus resiliency over all eligible entities in the 80% allocation group. Similarly, for the SoVI based distribution percentage of \(1+(\text{Raw SoVI} - \text{Min (Raw SoVI)})\), the 1) \(1+(\text{Raw SoVI} - \text{Min (Raw SoVI)})\) value for the county was divided by 2) the sum of the \(1+(\text{Raw SoVI} - \text{Min (Raw SoVI)})\) values over all counties in the 80% allocation group which gives the distribution percentage for the positive SoVI scores. Finally, for the distribution percentage based on unmet needs per capita, the 1) county per capita unmet need plus (+) resiliency for a county was divided (/) by 2) the sum of the unmet need per capita value across all counties in the HUD Impacted Counties/Cities 80% allocation group for Local Infrastructure Program (LIP) funding. An analogous process was used for the HUD Impacted Counties/Cities 20% allocation group for LIP funding.

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

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

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

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

COG: GOLDEN CRESCENT REGIONAL PLANNING COMMISSION (GCRPC)

<table>
<thead>
<tr>
<th>City, County or Eligible Entity</th>
<th>Local Buyout and Acquisition Program</th>
<th>Local Infrastructure Program</th>
<th>Total</th>
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<tbody>
<tr>
<td></td>
<td>Required Allocation</td>
<td>Percentage of Allocation</td>
<td>Required Allocation</td>
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<tr>
<td>Victoria County (Excluding City of Victoria)</td>
<td>$2,545,545</td>
<td>13.81%</td>
<td>$3,515,651</td>
</tr>
<tr>
<td>City of Victoria</td>
<td>$2,441,508</td>
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<td>$6,056,722</td>
</tr>
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<td>77979 Calhoun County (Excluding City of Point Comfort)</td>
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<td><strong>$18,430,647</strong></td>
<td><strong>100.00%</strong></td>
<td><strong>$36,044,589</strong></td>
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</table>

- Percentage of Total Allocation: 33.83% 66.17%
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<thead>
<tr>
<th>City, County or Eligible Entity</th>
<th>First Distribution Factor: Unmet Need plus Resiliency</th>
<th>Second Distribution Factor: Social Vulnerability</th>
<th>Third Distribution Factor: Per Capita Unmet Need</th>
<th>Proportional Factor (PWF)</th>
<th>Proportional Distribution Floor for Formulaic Distribution (AFD)</th>
<th>Distribution Total</th>
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<td>42.93% 50% 0.21</td>
<td>20.83% 40% 0.08</td>
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<td>2,000,000</td>
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<td>Proportional Total: 100%</td>
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<td>Housing - Allocation for Formulaic Distribution (AFD)</td>
<td>Proportional Distribution PWF x AFD</td>
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<tr>
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<td>Weight (W)</td>
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<td>Proportion of Weight W(FM/SUM)</td>
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<td>8 40%</td>
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<td>29 10%</td>
<td>0.03</td>
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<td>DeWitt County</td>
<td>23 50%</td>
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<td>31 40%</td>
<td>0.12</td>
<td>25 10%</td>
<td>0.02</td>
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<tr>
<td>Goliad County</td>
<td>16 50%</td>
<td>0.08</td>
<td>14 40%</td>
<td>0.05</td>
<td>15 10%</td>
<td>0.02</td>
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<tr>
<td>Gonzales County</td>
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<td>0.05</td>
<td>29 40%</td>
<td>0.12</td>
<td>17 10%</td>
<td>0.02</td>
</tr>
<tr>
<td>Jackson County</td>
<td>8 50%</td>
<td>0.04</td>
<td>9 40%</td>
<td>0.03</td>
<td>8 10%</td>
<td>0.01</td>
</tr>
<tr>
<td>Lavaca County</td>
<td>3 50%</td>
<td>0.01</td>
<td>9 40%</td>
<td>0.04</td>
<td>5 10%</td>
<td>0.01</td>
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<tr>
<td>SUM</td>
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<td>100</td>
<td>100</td>
<td>100</td>
<td>Proportion Total Total:</td>
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Hurricane Harvey  
Regional Method of Distribution Allocation  
GCRPC - Infrastructure Factors - 80% Most Impacted Areas  

Summary

<table>
<thead>
<tr>
<th>City or County</th>
<th>First Distribution Factor: Unmet Need plus Resiliency</th>
<th>Second Distribution Factor: Social Vulnerability</th>
<th>Third Distribution Factor: Per Capita Unmet Need</th>
<th>Proportional Weighted Factor (PWF)</th>
<th>Proportional Distribution for Formulaic Distribution (AFD)</th>
<th>Proportional Distribution PWF x AFD</th>
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</thead>
<tbody>
<tr>
<td>Victoria County</td>
<td>18.64% 50% 0.09</td>
<td>21% 40% 0.08</td>
<td>13% 10% 0.01</td>
<td>19%</td>
<td>$ 18,026,069</td>
<td>$ 3,415,651</td>
</tr>
<tr>
<td>(Excluding City of Victoria)</td>
<td></td>
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<td></td>
<td>$ 100,000</td>
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<tr>
<td>City of Victoria</td>
<td>46.84% 50% 0.23</td>
<td>21% 40% 0.08</td>
<td>13% 10% 0.01</td>
<td>33%</td>
<td>$ 18,026,069</td>
<td>$ 5,956,722</td>
</tr>
<tr>
<td>77979 Calhoun County</td>
<td>9.64% 50% 0.05</td>
<td>29% 40% 0.12</td>
<td>37% 10% 0.04</td>
<td>20%</td>
<td>$ 18,026,069</td>
<td>$ 3,640,301</td>
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<tr>
<td>(Excluding City of Port Lavaca)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$ 100,000</td>
</tr>
<tr>
<td>City of Port Lavaca (77979)</td>
<td>24.88% 50% 0.12</td>
<td>29% 40% 0.12</td>
<td>37% 10% 0.04</td>
<td>28%</td>
<td>$ 18,026,069</td>
<td>$ 5,013,395</td>
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<tr>
<td>SUM</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td></td>
<td></td>
<td>$ 400,000</td>
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</table>

Proportion Total: 100%

Distribution Floor: $ 18,026,069
Total Distribution: $ 18,426,069
### Hurricane Harvey

**Regional Method of Distribution Allocation**

**GCRPC - Infrastructure Factors - 20% Impacted Areas**

**Summary**

<table>
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<tr>
<th>City or County</th>
<th>First Distribution Factor: Unmet Need plus Resiliency</th>
<th>Second Distribution Factor: Social Vulnerability</th>
<th>Third Distribution Factor: Per Capita Unmet Need</th>
<th>Infrastructure - Allocation for Formulaic Distribution (AFD)</th>
<th>Proportional Distribution PWF x AFD</th>
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<tr>
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<td>Proportion of Weight W(FM/SUM)</td>
<td>Factor Weight: 40%</td>
<td>Proportion of Weight W(FM/SUM)</td>
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<td>0.11</td>
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<td>21% 10%</td>
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<tr>
<td>City of Point Comfort</td>
<td>6.15% 50%</td>
<td>0.03</td>
<td>2.08% 40%</td>
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<tr>
<td>City of Seadrift</td>
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<tr>
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<td>7.90% 40%</td>
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<td>3% 10%</td>
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<td>3% 10%</td>
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<td>2% 10%</td>
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<td>1.64% 50%</td>
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<td>3.49% 40%</td>
<td>0.01</td>
<td>2% 10%</td>
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<td>Gonzales County</td>
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<td>7.34% 40%</td>
<td>0.03</td>
<td>1% 10%</td>
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<td>7.34% 40%</td>
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<td>7.34% 40%</td>
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<td>1% 10%</td>
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<tr>
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<td>7.34% 40%</td>
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<td>0.03</td>
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<td>Jackson County</td>
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<tr>
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<td>3% 10%</td>
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<tr>
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<td>3% 10%</td>
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<td>0% 10%</td>
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<td>City of Shiner</td>
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<td>0% 10%</td>
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**Proportion Total Distribution**

$15,418,520$
### GCRPC Regional Funding

#### REGIONAL CDBG-DR METHOD OF DISTRIBUTION ALLOCATION SUMMARY

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<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
<th>LMI Amount (70% of Total Allocation)</th>
<th>Total</th>
<th>% of Total Regional Allocation</th>
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<tbody>
<tr>
<td>Local Buyout/Acquisition Program</td>
<td>$ 8,606,577</td>
<td>$ 9,824,070</td>
<td>$ 12,901,453</td>
<td>$ 18,430,647</td>
<td>33.83%</td>
</tr>
<tr>
<td>Local Infrastructure Program</td>
<td>$ 18,426,069</td>
<td>$ 17,618,520</td>
<td>$ 25,231,212</td>
<td>$ 36,044,589</td>
<td>66.17%</td>
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<tr>
<td><strong>Total Regional Allocation</strong></td>
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<td><strong>$ 54,475,236</strong></td>
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#### CDBG-DR Program Funding Requiring Regional Methods of Distribution

<table>
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<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
<th>LMI Amount (70% of Total Allocation)</th>
<th>Total</th>
<th>% of Total Regional Allocation</th>
</tr>
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<tbody>
<tr>
<td>Local Buyout/Acquisition Program</td>
<td>$ 8,606,577</td>
<td>$ 9,824,070</td>
<td>$ 12,901,453</td>
<td>$ 18,430,647</td>
<td>33.83%</td>
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<tr>
<td>Local Infrastructure Program</td>
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<td>$ 17,618,520</td>
<td>$ 25,231,212</td>
<td>$ 36,044,589</td>
<td>66.17%</td>
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## GCRPC LBAP MOD Allocation Summary

### Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes

<table>
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<th>COG</th>
<th>County/Zip Code (Excluding City of)</th>
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<td>2</td>
<td>GCRPC</td>
<td>City of Victoria</td>
<td>$2,441,508</td>
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<tr>
<td>3</td>
<td>GCRPC</td>
<td>77979 Calhoun County (Excluding City of Port Lavaca)</td>
<td>$1,858,095</td>
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<td>4</td>
<td>GCRPC</td>
<td>City of Port Lavaca (77979)</td>
<td>$1,761,429</td>
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**80% LBAP Sub-total**

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<td>GCRPC Victoria Count (Excluding City of Victoria)</td>
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<td>$1,781,881</td>
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<td>GCRPC City of Victoria</td>
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<td>$1,709,055</td>
</tr>
<tr>
<td>GCRPC 77979 Calhoun County (Excluding City of Port Lavaca)</td>
<td>$1,858,095</td>
<td>$1,300,667</td>
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<tr>
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<td>$1,761,429</td>
<td>$1,233,000</td>
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### Initial 20% Allocation of Funds for HUD Impacted Counties

<table>
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<tr>
<th>#</th>
<th>COG</th>
<th>County/Zip Code</th>
<th>70% LMI</th>
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<tr>
<td>5</td>
<td>GCRPC</td>
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<td>GCRPC</td>
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<td>$1,583,333</td>
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<td>8</td>
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<td>10</td>
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**20% LBAP Sub-Total**

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<td>GCRPC DeWitt County</td>
<td>$1,952,614</td>
<td>$1,366,830</td>
</tr>
<tr>
<td>GCRPC Goliad County</td>
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<td>$1,108,333</td>
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<tr>
<td>GCRPC Gonzales County</td>
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<td>$1,167,400</td>
</tr>
<tr>
<td>GCRPC Jackson County</td>
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<tr>
<td>GCRPC Lavaca County</td>
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<td>$839,301</td>
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**GCRPC LBAP Grand Total(s)**

<p>| | | |</p>
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<tr>
<td>GCRPC LBAP MOD Allocation Summary</td>
<td>$18,430,647</td>
<td>$12,901,453</td>
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As of: 7/10/2018
### Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes

<table>
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<tr>
<th>#</th>
<th>COG</th>
<th>Description</th>
<th>70% LMI</th>
<th>80% LBAP Sub-total</th>
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<tbody>
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<td>1</td>
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<td>3</td>
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<td>4</td>
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<td>5</td>
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<tr>
<td>6</td>
<td>GCRPC</td>
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<tr>
<td>7</td>
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<td>$1,300,667</td>
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<tr>
<td>8</td>
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<td>9</td>
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<td>11</td>
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<td>80% LBAP Sub-total</td>
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### Initial 20% Allocation of Funds for HUD Impacted Counties

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<td>La Ward Telephone Exchange, Inc.</td>
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<td>63</td>
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<td>$839,301</td>
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<td>64</td>
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**As of:** 8/6/2018

**GCRPC LBAP Grand Total(s)** $18,430,647 $12,901,433
GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>HUD Total LBAP Funding to Allocate</th>
<th>$18,430,647</th>
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<tbody>
<tr>
<td>Required Minimum Distribution (Per Eligible Entity)</td>
<td>$1,000,000</td>
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<td>4,000,000</td>
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<tr>
<td>80% Allocation $ Left After Required Minimum Distribution</td>
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| Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes | $ 8,606,577 |

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Median $ Value of Housing Units for Homeowners/ Median Value of Constructing Rental Unit for Renters</th>
<th>FEMA Verified Count of Unmet Need --Major-Low Damage Severity</th>
<th>FEMA Verified Count of Unmet Need --Major-High Damage Severity</th>
<th>FEMA Verified Count of Unmet Need --Severe Damage</th>
<th>Total FEMA Verified Count of Unmet Need Units</th>
<th>Unmet Need $ Amount Derived Using Severity Levels</th>
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<tbody>
<tr>
<td>1</td>
<td>GCRPC Victoria County (Excluding City of Victoria)</td>
<td>26,328</td>
<td>382</td>
<td>178</td>
<td>44</td>
<td>604</td>
<td>38,728,213</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homeowner</td>
<td>124,100</td>
<td>184</td>
<td>76</td>
<td>28</td>
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<tr>
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<td>Renter</td>
<td>75,338</td>
<td>198</td>
<td>102</td>
<td>16</td>
<td>316</td>
<td>15,317,660</td>
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<td>382</td>
<td>178</td>
<td>44</td>
<td>604</td>
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<td>15,317,660</td>
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<td>7</td>
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<td>4,555,850</td>
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As of: 7/10/2018  
Totals For More
## GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount, Plus 15% Resiliency Derived Using Severity Levels</th>
<th>Unmet Need Plus Resiliency Removing Any Overlap</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min SoVI)</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
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<tbody>
<tr>
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<td>5,809,232</td>
<td>44,537,445</td>
<td>44,537,445</td>
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<td>1,691.64</td>
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<tr>
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<td>17,615,309</td>
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<td>GCRPC City of Victoria</td>
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<td>5,809,232</td>
<td>44,537,445</td>
<td>44,537,445</td>
<td>-0.817484</td>
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<td>673.39</td>
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<td>17,615,309</td>
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</tr>
<tr>
<td>10</td>
<td>GCRPC City of Port Lavaca (77979)</td>
<td>12248</td>
<td>956,525</td>
<td>7,333,361</td>
<td>7,333,361</td>
<td>-0.41746</td>
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<tr>
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<td>683,377</td>
<td>5,239,227</td>
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<td>2,094,134</td>
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As of: 7/10/2018

Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes $8,606,577

Required Minimum Distribution (Per Eligible Entity) $1,000,000

80% Allocation $ Left After Required Minimum Distribution $4,606,577

As of: 7/10/2018

Min SoVI -0.8175

<table>
<thead>
<tr>
<th>Code</th>
<th>SoVI</th>
<th>Positive SoVI</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
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<tr>
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<tr>
<td>0.8175</td>
<td>0.40</td>
<td>860.47</td>
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### GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>HUD Total LBAP Funding to Allocate</th>
<th>$18,430,647</th>
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<tbody>
<tr>
<td>Required Minimum Distribution (Per Eligible Entity)</td>
<td>$1,000,000</td>
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<tr>
<td>80% Allocation $ Left After Required Minimum Distribution</td>
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#### Distribution Percentages:

<table>
<thead>
<tr>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes</th>
<th>$8,606,577</th>
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<tbody>
<tr>
<td><strong>COG</strong></td>
<td><strong>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</strong></td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-------------</td>
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<td></td>
<td>Renter</td>
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</table>

As of: 7/10/2018

| 100% | 100% | 100% | 100% | $8,606,577 |
### GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>HUD Total LBAP Funding to Allocate</th>
<th>$18,430,647</th>
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</thead>
<tbody>
<tr>
<td>Required Minimum Distribution (Per Eligible Entity)</td>
<td>$1,000,000</td>
</tr>
<tr>
<td>80% Allocation $ Left After Required Minimum Distribution</td>
<td>$4,606,577</td>
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<tr>
<td>Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes</td>
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<tr>
<td>HUD-GLO Additional LBAP Allocation</td>
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<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount × (Percentage Allocation Using Unconstrained 50-40-10 Model)</th>
<th>Total $ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints</th>
<th>Maximum Future Additional Distribution #1</th>
<th>Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency</th>
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<tr>
<td></td>
<td>Renter</td>
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</tr>
<tr>
<td>2</td>
<td>GCRPC City of Victoria</td>
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<tr>
<td>7</td>
<td>GCRPC 77979 Calhoun County (Excluding City of Port Lavaca)</td>
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<td>5,730,161</td>
<td>$1,858,095</td>
<td>$3,872,066</td>
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<tr>
<td></td>
<td>Renter</td>
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<td></td>
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<tr>
<td>10</td>
<td>GCRPC City of Port Lavaca (77979)</td>
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<td>Renter</td>
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</table>

As of: 7/10/2018

| Remaining Regional Unmet Need Plus Resiliency Cost | $86,528,457 |
### GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Maximum Future Additional Distribution #2</th>
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</thead>
<tbody>
<tr>
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<td>GCRPC Victoria County (Excluding City of Victoria)</td>
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<tr>
<td></td>
<td>Renter</td>
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</tr>
<tr>
<td>2</td>
<td>GCRPC City of Victoria</td>
<td>66139</td>
<td>$39,402,734</td>
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<tr>
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<tr>
<td>7</td>
<td>GCRPC 77979 Calhoun County (Excluding City of Port Lavaca)</td>
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<td>$3,872,066</td>
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<tr>
<td></td>
<td>Homeowner</td>
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<tr>
<td></td>
<td>Renter</td>
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<tr>
<td>10</td>
<td>GCRPC City of Port Lavaca (77979)</td>
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<td>$4,149,335</td>
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</table>

As of: 7/10/2018

Remaining Regional Unmet Need Plus Resiliency Cost After Allocation of Additional Funding

$86,528,457
## GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution % for Counties Not Hitting Max in First Distribution</th>
<th>HUD Dollar Value Severity Category Multipliers</th>
<th>Unmet Need Severity Category</th>
<th>HUD $ Damage Thresholds by Severity Category for Owners</th>
<th>HUD $ Damage Thresholds by Severity Category for Renters</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 GCRPC</td>
<td>Victoria County <em>(Excluding City of Victoria)</em></td>
<td>26,328</td>
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<td>7500</td>
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</tr>
<tr>
<td>2 GCRPC</td>
<td>City of Victoria</td>
<td>66119</td>
<td>NO</td>
<td>31.29%</td>
<td>0.5777</td>
<td>Major-Low</td>
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<td></td>
<td>0.7150</td>
<td>Major-High</td>
<td>1.0000</td>
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<tr>
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<td>Renter</td>
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<td></td>
</tr>
<tr>
<td>7 GCRPC</td>
<td>Calhoun County <em>(Excluding City of Port Lavaca)</em></td>
<td>4747</td>
<td>NO</td>
<td>18.63%</td>
<td>1.0000</td>
<td>Severe</td>
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<tr>
<td></td>
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<td></td>
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<td>1.0000</td>
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<tr>
<td></td>
<td>Renter</td>
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<tr>
<td>10 GCRPC</td>
<td>City of Port Lavaca <em>(77979)</em></td>
<td>12248</td>
<td>NO</td>
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<tr>
<td></td>
<td>Renter</td>
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</tbody>
</table>

As of: 7/10/2018 100%
GCRPC Local Buyout and Acquisition Program (LBAP) Method of Distribution

**HUD Total LBAP Funding to Allocate** $18,430,647

- **Required Minimum Distribution (Per Eligible Entity)** $1,000,000
- **80% Allocation** $4,606,577

**Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes** $8,606,577

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Median $ Value of Housing Units for Homeowners</th>
<th>Median Value of Constructing Rental Unit for Renters</th>
<th>FEMA Verified Count of Unmet Need—Major-Low Damage Severity</th>
<th>FEMA Verified Count of Unmet Need—Major-High Damage Severity</th>
<th>FEMA Verified Count of Unmet Need—Severe Damage</th>
<th>Total FEMA Verified Count of Unmet Need Units</th>
<th>Unmet Need $ Amount Derived Using Severity Levels</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount, Plus 15% Resiliency Derived Using Severity Levels</th>
<th>Unmet Need Plus Resiliency Removing Any Overlap</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min SoVI)</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
<th>Distribution Percentage Based on Unmet Need plus Resiliency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>GCRPC Victoria County (Excluding City of Victoria)</td>
<td>26,328</td>
<td>182</td>
<td>178</td>
<td>44</td>
<td>804</td>
<td>38,326,253</td>
<td>5,809,252</td>
<td>44,537,445</td>
<td>0.8174</td>
<td>4,437,445</td>
<td>-0.81748</td>
<td>1.00</td>
<td>1,691.64</td>
<td>42.93%</td>
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</tr>
<tr>
<td></td>
<td>Homeowners</td>
<td>144</td>
<td>184</td>
<td>178</td>
<td>44</td>
<td>804</td>
<td>38,326,253</td>
<td>5,809,252</td>
<td>44,537,445</td>
<td>0.8174</td>
<td>4,437,445</td>
<td>-0.81748</td>
<td>1.00</td>
<td>1,691.64</td>
<td>42.93%</td>
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<tr>
<td></td>
<td>Renters</td>
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<td>198</td>
<td>102</td>
<td>16</td>
<td>316</td>
<td>15,317,660</td>
<td>2,297,649</td>
<td>17,615,309</td>
<td>0.8174</td>
<td>2,297,649</td>
<td>-0.81748</td>
<td>1.00</td>
<td>673.39</td>
<td>42.93%</td>
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</tr>
<tr>
<td>2</td>
<td>GCRPC City of Victoria</td>
<td>60,139</td>
<td>182</td>
<td>178</td>
<td>44</td>
<td>804</td>
<td>38,326,253</td>
<td>5,809,252</td>
<td>44,537,445</td>
<td>0.8174</td>
<td>4,437,445</td>
<td>-0.81748</td>
<td>1.00</td>
<td>1,691.64</td>
<td>42.93%</td>
<td></td>
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<tr>
<td></td>
<td>Homeowners</td>
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<td>178</td>
<td>44</td>
<td>804</td>
<td>38,326,253</td>
<td>5,809,252</td>
<td>44,537,445</td>
<td>0.8174</td>
<td>4,437,445</td>
<td>-0.81748</td>
<td>1.00</td>
<td>1,691.64</td>
<td>42.93%</td>
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<tr>
<td></td>
<td>Renters</td>
<td>75,338</td>
<td>198</td>
<td>102</td>
<td>16</td>
<td>316</td>
<td>15,317,660</td>
<td>2,297,649</td>
<td>17,615,309</td>
<td>0.8174</td>
<td>2,297,649</td>
<td>-0.81748</td>
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<td>673.39</td>
<td>42.93%</td>
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<tr>
<td>3</td>
<td>GCRPC Victoria ISD (Grand Total County minus Nursery ISD)</td>
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<td>11</td>
<td>7</td>
<td>60</td>
<td>4,555,850</td>
<td>683,377</td>
<td>5,239,227</td>
<td>0.8175</td>
<td>4,555,850</td>
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<td>1.00</td>
<td>1,544.84</td>
<td>7.07%</td>
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<td>4</td>
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<td>44</td>
<td>804</td>
<td>38,326,253</td>
<td>5,809,252</td>
<td>44,537,445</td>
<td>0.8174</td>
<td>4,437,445</td>
<td>-0.81748</td>
<td>1.00</td>
<td>1,691.64</td>
<td>42.93%</td>
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<td>5</td>
<td>GCRPC Victoria County Junior College District (Enrollment 2016-17)</td>
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<td>7,333,361</td>
<td>-0.41746</td>
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<td>1,544.84</td>
<td>7.07%</td>
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<tr>
<td>6</td>
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<td>21</td>
<td>9</td>
<td>98</td>
<td>6,376,835</td>
<td>956,525</td>
<td>7,333,361</td>
<td>0.41746</td>
<td>7,333,361</td>
<td>-0.41746</td>
<td>1.40</td>
<td>1,544.84</td>
<td>7.07%</td>
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<tr>
<td>7</td>
<td>GCRPC Calhoun County (Excluding City of Port Lavaca)</td>
<td>4747</td>
<td>36</td>
<td>11</td>
<td>7</td>
<td>60</td>
<td>4,555,850</td>
<td>683,377</td>
<td>5,239,227</td>
<td>0.8175</td>
<td>4,555,850</td>
<td>-0.8175</td>
<td>1.00</td>
<td>598.30</td>
<td>7.07%</td>
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<tr>
<td>8</td>
<td>GCRPC Calhoun County Independent School District (Enrollment 2016-17)</td>
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<td>116429</td>
<td>42</td>
<td>11</td>
<td>7</td>
<td>60</td>
<td>4,555,850</td>
<td>683,377</td>
<td>5,239,227</td>
<td>0.8175</td>
<td>4,555,850</td>
<td>-0.8175</td>
<td>1.00</td>
<td>598.30</td>
<td>7.07%</td>
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<tr>
<td>9</td>
<td>GCRPC South Calhoun County Water Control &amp; Improvement District (Enrollment 2016-17)</td>
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<td>42</td>
<td>11</td>
<td>7</td>
<td>60</td>
<td>4,555,850</td>
<td>683,377</td>
<td>5,239,227</td>
<td>0.8175</td>
<td>4,555,850</td>
<td>-0.8175</td>
<td>1.00</td>
<td>598.30</td>
<td>7.07%</td>
</tr>
<tr>
<td>10</td>
<td>GCRPC City of Port Lavaca (77979)</td>
<td>32248</td>
<td>116429</td>
<td>42</td>
<td>11</td>
<td>7</td>
<td>60</td>
<td>4,555,850</td>
<td>683,377</td>
<td>5,239,227</td>
<td>0.8175</td>
<td>4,555,850</td>
<td>-0.8175</td>
<td>1.00</td>
<td>598.30</td>
<td>7.07%</td>
</tr>
</tbody>
</table>

- **As of:** 6/20/2018
- **Totals For Most Impacted Counties and Zip Codes:** 103,741,611
- **Min SoVI:** -0.8175
### GCRPC LBAP MOD 80%

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

**HUD Total LBAP Funding to Allocate**: $18,430,647

**Required Minimum Distribution (Per Eligible Entity)**: $1,000,000

**80% Allocation Left After Required Minimum Distribution**: $4,606,577

**Initial 80% Allocation of Funds For HUD Most Impacted Counties and Zip Codes**: $8,606,577

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Distribution Percentage Based on 1-(Raw SoVI - Min(Raw SoVI))</th>
<th>Distribution Percentage Based on Per-Capita Unmet Needs</th>
<th>Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI-MinSoVI), and 10% (Unmet Need Per Capita)</th>
<th>$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints</th>
<th>Shortfall: (Unmet Need Plus Resiliency) minus Funding Amount × (Percentage Allocation Using Unconstrained 50-40-10 Model)</th>
<th>Total $ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints</th>
<th>Maximum Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency</th>
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<td>Victoria County (Excluding City of Victoria)</td>
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<td>37.52%</td>
<td>33.55%</td>
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<tr>
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<td>9</td>
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<td>10</td>
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<td>13.28%</td>
<td>16.53%</td>
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<td>5,910,764</td>
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**As of: 6/20/2018**

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<td>$86,528,457</td>
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Remaining Regional Unmet Need Plus Resiliency Cost
GCRPC LBAP MOD 80%

**Local Buyout and Acquisition Program (LBAP)**

Method of Distribution

<table>
<thead>
<tr>
<th>HUD Total LBAP Funding to Allocate</th>
<th>$18,430,647</th>
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<tbody>
<tr>
<td>Required Minimum Distribution (Per Eligible Entity)</td>
<td>$1,000,000</td>
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<tr>
<td>80% Allocation $ Left After Required Minimum Distribution</td>
<td>$4,606,577</td>
</tr>
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</table>

| Initial 80% Allocation of Funds for HUD Most Impacted Counties and Zip Codes | $ 8,606,577 |

<table>
<thead>
<tr>
<th>COG</th>
<th>Most Impacted Declared Disaster County or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Maximum Future Additional Distribution #2</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution % for Counties Not Hitting Max in First Distribution</th>
<th>HUD Dollar Value Severity Category Multipliers</th>
<th>Unmet Need Severity Category</th>
<th>HUD $ Damage Thresholds by Severity Category for Owners</th>
<th>HUD $ Damage Thresholds by Severity Category for Renters</th>
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<tbody>
<tr>
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<td>26,328</td>
<td>$39,104,522</td>
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<td>$72,961.00</td>
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<td>3000-7499</td>
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<td>$102,046.00</td>
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<td>≥ 7500</td>
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<td>Renter: 1.0000</td>
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<td>2</td>
<td>GCRPC</td>
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<td>66139</td>
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<td>Renter: 1.0000</td>
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<td>3</td>
<td>GCRPC</td>
<td>Victoria ISD (Grand Total County minus Nursery ISD)</td>
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<td>4</td>
<td>GCRPC</td>
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<td>5</td>
<td>GCRPC</td>
<td>Victoria County Junior College District (Enrollment 2016-17)</td>
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<td>GCRPC</td>
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<td>7</td>
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<td>77979 Calhoun County (Excluding City of Port Lavaca)</td>
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<td>8</td>
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<td>Calhoun County Independent School District (City of Port Lavaca and 77979)</td>
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<td>GCRPC</td>
<td>South Central Calhoun County Water Control &amp; Improvement District #1</td>
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<td>16.53%</td>
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<td>0.5777 3500-7499</td>
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As of: 6/28/2018

$86,528,457 100%

Remaining Regional Unmet Need Plus Resiliency Cost after Allocation of Additional Funding
As of: 7/10/2018

### Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority

<table>
<thead>
<tr>
<th>COG</th>
<th>County/City Population</th>
<th>Median $ Value of Housing Units for Homeowners</th>
<th>Median Value of Constructing Rental Unit for Renter</th>
<th>FEMA Verified Count of Unmet Need—Major-Low Damage Severity</th>
<th>FEMA Verified Count of Unmet Need—Major-High Damage Severity</th>
<th>FEMA Verified Count of Unmet Need—Severe Damage</th>
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<tbody>
<tr>
<td>GCRPC</td>
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<tr>
<td>22</td>
<td>Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)</td>
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<td>111,500</td>
<td>36</td>
<td>13</td>
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<tr>
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<td>$</td>
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<tr>
<td>Renter</td>
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<td>City of Point Comfort</td>
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<td>Renter</td>
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<td>Renter</td>
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<tr>
<td>GCRPC</td>
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<tr>
<td>25</td>
<td>Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)</td>
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<td>98,800</td>
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<td>Renter</td>
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<td>Renter</td>
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<td>City of Shiner</td>
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$ 9,824,070

Required Minimum Distribution (Per Eligible Entity)

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<th>$ 6,000,000</th>
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<td>HUD</td>
<td>$ 3,824,070</td>
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HUD = Lg UmNed Need%( % units high or severe damage)

Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority

- $ 9,824,070
- Required Minimum Distribution (Per Eligible Entity)
  - County/City Population
  - Homeowner
  - Renter
- Minimum Distribution
  - HUD

- HUD = Lg UmNed Need%( % units high or severe damage)
As of: 7/10/2018
Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority

<table>
<thead>
<tr>
<th>COG</th>
<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
<th>County/City Population</th>
<th>Total FEMA Verified Count of Unmet Need Units</th>
<th>Unmet Need $ Amount Derived Using Severity Levels</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount, Plus 15% Resiliency Derived Using Severity Levels</th>
<th>Unmet Need Plus Resiliency Removing Any Overlap</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min(SoVI))</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
<th>Distribution Percentage Based on Unmet Need Plus Resiliency</th>
<th>Distribution Percentage Based on 1+(Raw SoVI - Min(Raw SoVI))</th>
<th>Distribution Percentage Based on Per-Capita Unmet Needs</th>
<th>Percentage Distribution Based on Model with 50% (Unmet Need plus Resiliency), 40% (1+SoVI - Min(SoVI)), and 10% (Unmet Need Per Capita)</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Calhoun County (Excluding Zip 77979 Calhoun, Point Comfort, and Seadrift)</td>
<td>4970</td>
<td>55</td>
<td>$ 3,686,209</td>
<td>552,931</td>
<td>$ 4,239,141</td>
<td>$ 4,239,141</td>
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<td>39.42%</td>
<td>8.18%</td>
<td>64.18%</td>
<td>29.40%</td>
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<td>Homeowners</td>
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<td>15</td>
<td>$ 704,579</td>
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</table>

Totals For Not Most Impacted and Distressed Areas: 10,753,171 12.22 1,329 100% 100% 100% 100%
As of: 7/10/2018

Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority $ 9,824,070

Required Minimum Distribution (Per Eligible Entity) $ 1,000,000

Minimum Distribution $ 3,824,070

<table>
<thead>
<tr>
<th>COG</th>
<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
<th>County/City Population</th>
<th>Total $ Available to Allocate After Minimum Distribution</th>
<th>Total $ Allocation Using the 50-40-10 Model Without Imposed Distributional Constraints</th>
<th>Maximum Future Additional Distribution #1</th>
<th>Maximum Future Additional Distribution #2</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution % for Counties Not Hitting Max in First Distribution</th>
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<td>Callahan County (Excluding Zip 77979 Callahan, Point Comfort, and Seadrift)</td>
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9,824,070 | 9,824,070 | 1,692,331.54 | - | $ 1,692,332 | 77% | Remaining Regional | Unmet Need Plus Resiliency Cost After Allocation of Additional Funding | Remaining Regional | Unmet Need Plus Resiliency Cost After Allocation of Additional Funding |
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<tr>
<th>COG</th>
<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
<th>County/City Population</th>
<th>Median $ Value of Housing Units' Median Value of Constructing Rental Unit for Renters</th>
<th>FEMA Verified Count of Unmet Need--Major- Low Damage Severity</th>
<th>FEMA Verified Count of Unmet Need--Major- High Damage Severity</th>
<th>FEMA Verified Count of Unmet Need--Severe Damage</th>
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### Initial 20% Allocation of Funds for Impacted Counties, Cities, & Entities with Eminent Domain Authority

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<tr>
<th>COG</th>
<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
<th>County/City Population</th>
<th>Total FEMA Verified Count of Unmet Need Units</th>
<th>Unmet Need $ Amount Derived Using Severity Levels</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount Plus 15% Resiliency Derived Using Severity Levels</th>
<th>Unmet Need Plus Resiliency Remaining Any Overlap</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min SoVI)</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
<th>Distribution Percentage Based on Unmet Need Plus Resiliency</th>
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**Totals For Not Most Impacted and Distressed Areas**

- $10,753,171
- 12.22
- 1.329
- 100%
**GCRPC LBAP MOD 20%**

**As of: 6/28/2018**

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<tr>
<th>COG</th>
<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
<th>County/City Population</th>
<th>Distribution Percentage Based on F(I)(Raw SoVI - Min(Raw SoVI))</th>
<th>Distribution Percentage Based on Per-Capita Unmet Need</th>
<th>Percentage Distribution Based on Model with 80% (Unmet Need plus Resiliency), 40% (F(I)+SeVI-MinSeVI), and 18% (Unmet Need Per Capita)</th>
<th>$ Allocation Amount Using The 50-40-10 Model Without Imposed Distributional Constraints</th>
<th>Total $ Available to Allocate After Minimum Distribution</th>
<th>Total $ Allocation Amount Using the 50-40-10 Model With Imposed Distributional Constraints</th>
<th>Maximum Future Additional Distributional Constraints</th>
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**Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority**

**Required Minimum Distribution (Per Eligible Entity)**

**Distribution**

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<th>Impacted Eligible Entity to Receive at Least 20% Allocation</th>
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**HUD-GLO Additional LBAP Allocation**
### Table: Initial 20% Allocation of Funds For Impacted Counties, Cities, & Entities with Eminent Domain Authority

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<th>COG</th>
<th>Initial 20% Allocation of Funds For Impacted Counties, Cities, &amp; Entities with Eminent Domain Authority</th>
<th>Required Minimum Distribution Per Eligible Entity</th>
<th>Future Additional Distribution #1 Constrained by a Maximum of 100% of Remaining Unmet Need Plus Resiliency</th>
<th>Maximum Future Additional Distribution #2</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution % for Counties Not Hitting Max in First Distribution</th>
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<td>Calhoun County (Excluding City of Point Comfort, and Seadrift)</td>
<td>$ 1,580,551</td>
<td>NO</td>
<td>29.48%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>City of Point Comfort</td>
<td>$ -</td>
<td>-</td>
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<td></td>
<td></td>
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<tr>
<td>16</td>
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<td>$ -</td>
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</tr>
<tr>
<td>17</td>
<td>Ganado Independent School District</td>
<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>City of Ganado</td>
<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>City of Hallettsville</td>
<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
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<td>$ -</td>
<td>-</td>
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</tr>
<tr>
<td>26</td>
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<td>$ -</td>
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<td>33</td>
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<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>34</td>
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<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>40</td>
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<td>$ -</td>
<td>-</td>
<td></td>
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<tr>
<td>41</td>
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<tr>
<td>42</td>
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<td>-</td>
<td></td>
<td></td>
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<tr>
<td>43</td>
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<tr>
<td>44</td>
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<td></td>
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<td>53</td>
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<tr>
<td>56</td>
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<td>-</td>
<td></td>
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<td>57</td>
<td>City of Yoakum</td>
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<td>-</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>58</td>
<td>City of Yoakum</td>
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<td>-</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>59</td>
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<td>-</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>61</td>
<td>City of La Ward</td>
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<td>-</td>
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<td></td>
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<tr>
<td>64</td>
<td>City of Hallettsville</td>
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<td>-</td>
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</tr>
<tr>
<td>65</td>
<td>City of Hallettsville</td>
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<td>-</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>66</td>
<td>City of Hallettsville</td>
<td>$ -</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** Remaining Regional Unmet Need Plan Resiliency Cost After Allocation of Additional Funding

**As of:** 6/24/2018

**Table:**

- **COG:** Calhoun Regional Planning Center (GCRPC)
- **Future Additional Distribution #1** and **#2** are constrained by a maximum of 100% of remaining unmet need plus resiliency.
- **Maximum Allocation Reached?** indicates if the distribution reached the maximum allowed.
- **Original Distribution % for Counties Not Hitting Max in First Distribution** is calculated based on the original allocation.
# GCRPC LIP MOD Allocation Summary

## Initial 80% Allocation of Funds for HUD Most Impacted Counties & Zip Codes

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>County/Zip Code</th>
<th>Amount (80%)</th>
<th>Amount (70% LMI)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>GCRPC</td>
<td>Victoria County (Excluding City of Victoria)</td>
<td>$3,515,651</td>
<td>$2,460,956</td>
</tr>
<tr>
<td>2</td>
<td>GCRPC</td>
<td>City of Victoria</td>
<td>$6,056,722</td>
<td>$4,239,706</td>
</tr>
<tr>
<td>3</td>
<td>GCRPC</td>
<td>Calhoun County (Excluding City of Port Lavaca)</td>
<td>$3,740,301</td>
<td>$2,618,211</td>
</tr>
<tr>
<td>4</td>
<td>GCRPC</td>
<td>City of Port Lavaca (77979)</td>
<td>$5,113,395</td>
<td>$3,579,376</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>80% LIP Sub-Total</strong></td>
<td><strong>$18,426,069</strong></td>
<td><strong>$12,898,248</strong></td>
</tr>
</tbody>
</table>

## Initial 20% Allocation of Funds for HUD Impacted Counties

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>County/Zip Code</th>
<th>Amount (20%)</th>
<th>Amount (70% LMI)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>GCRPC</td>
<td>Calhoun County (Excluding Zip 77979 Calhoun County, Point Comfort, and Seadrift)</td>
<td>$2,196,247</td>
<td>$1,537,373</td>
</tr>
<tr>
<td>6</td>
<td>GCRPC</td>
<td>City of Point Comfort</td>
<td>$1,031,252</td>
<td>$721,877</td>
</tr>
<tr>
<td>7</td>
<td>GCRPC</td>
<td>City of Seadrift</td>
<td>$1,536,581</td>
<td>$1,075,607</td>
</tr>
<tr>
<td>8</td>
<td>GCRPC</td>
<td>DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)</td>
<td>$866,608</td>
<td>$606,626</td>
</tr>
<tr>
<td>9</td>
<td>GCRPC</td>
<td>City of Cuero</td>
<td>$1,426,977</td>
<td>$998,884</td>
</tr>
<tr>
<td>10</td>
<td>GCRPC</td>
<td>City of Yoakum</td>
<td>$1,416,383</td>
<td>$991,468</td>
</tr>
<tr>
<td>11</td>
<td>GCRPC</td>
<td>City of Yorktown</td>
<td>$793,105</td>
<td>$555,174</td>
</tr>
<tr>
<td>12</td>
<td>GCRPC</td>
<td>Goliad County (Excluding City of Goliad)</td>
<td>$723,030</td>
<td>$506,121</td>
</tr>
<tr>
<td>13</td>
<td>GCRPC</td>
<td>City of Goliad</td>
<td>$477,108</td>
<td>$333,975</td>
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<tr>
<td>14</td>
<td>GCRPC</td>
<td>Gonzales County (Excluding City of Gonzales, City of Nixon, City of Smiley, and City of Waelder)</td>
<td>$903,466</td>
<td>$632,426</td>
</tr>
<tr>
<td>15</td>
<td>GCRPC</td>
<td>City of Gonzales</td>
<td>$852,300</td>
<td>$596,610</td>
</tr>
<tr>
<td>16</td>
<td>GCRPC</td>
<td>City of Nixon</td>
<td>$671,903</td>
<td>$470,332</td>
</tr>
<tr>
<td>17</td>
<td>GCRPC</td>
<td>City of Smiley</td>
<td>$595,907</td>
<td>$417,135</td>
</tr>
<tr>
<td>18</td>
<td>GCRPC</td>
<td>City of Waelder</td>
<td>$623,785</td>
<td>$436,649</td>
</tr>
<tr>
<td>19</td>
<td>GCRPC</td>
<td>Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)</td>
<td>$840,270</td>
<td>$588,189</td>
</tr>
<tr>
<td>20</td>
<td>GCRPC</td>
<td>City of Edna</td>
<td>$730,897</td>
<td>$511,628</td>
</tr>
<tr>
<td>21</td>
<td>GCRPC</td>
<td>City of Ganado</td>
<td>$418,493</td>
<td>$292,945</td>
</tr>
<tr>
<td>22</td>
<td>GCRPC</td>
<td>City of La Ward</td>
<td>$297,827</td>
<td>$208,479</td>
</tr>
<tr>
<td>23</td>
<td>GCRPC</td>
<td>Lavaca County (Excluding City of Hallettsville, City of Moulton, and City of Shiner)</td>
<td>$400,454</td>
<td>$280,318</td>
</tr>
<tr>
<td>24</td>
<td>GCRPC</td>
<td>City of Hallettsville</td>
<td>$279,939</td>
<td>$195,957</td>
</tr>
<tr>
<td>25</td>
<td>GCRPC</td>
<td>City of Moulton</td>
<td>$263,295</td>
<td>$184,301</td>
</tr>
<tr>
<td>26</td>
<td>GCRPC</td>
<td>City of Shiner</td>
<td>$272,693</td>
<td>$190,885</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>20% LIP Sub-Total</strong></td>
<td><strong>$17,618,520</strong></td>
<td><strong>$12,332,964</strong></td>
</tr>
</tbody>
</table>

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

As of: 7/10/2018
## GCRPC Local Infrastructure Program Method of Distribution

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties, Cities, and Zip Codes</th>
<th>Required Minimum Allocation ($100,000/entity)</th>
<th>Grand Total</th>
<th>As of: 7/10/2018</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>$ 18,426,069</td>
<td>$ 400,000</td>
<td>$ 36,044,589</td>
<td></td>
</tr>
</tbody>
</table>

### Most Impacted Declared Disaster County, City, or Zip Code to Receive at Least 80% Allocation

<table>
<thead>
<tr>
<th></th>
<th>COG</th>
<th>County or Zip Code July 2016 Population</th>
<th>% of Total County Population</th>
<th>Public Assistance</th>
<th>Unmet Need $ Amount Derived Using 10% Match of Public Assistance Requests</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount Plus (+) 15% Resiliency</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min SoVI)</th>
<th>Estimated Unmet Need Plus Resiliency Amount per Capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>GCRPC Victoria County (Excluding City of Victoria)</td>
<td>26,328</td>
<td>28.47%</td>
<td>$ 10,785,033</td>
<td>$ 1,078,503</td>
<td>$ 161,775</td>
<td>$ 1,240,279</td>
<td>-0.817484</td>
<td>1.00</td>
<td>$ 47.11</td>
</tr>
<tr>
<td>2</td>
<td>GCRPC City of Victoria</td>
<td>66139</td>
<td>71.53%</td>
<td>$ 27,093,257</td>
<td>$ 2,709,326</td>
<td>$ 406,399</td>
<td>$ 3,115,725</td>
<td>-0.817484</td>
<td>1.00</td>
<td>$ 47.11</td>
</tr>
<tr>
<td>3</td>
<td>GCRPC 77979 Calhoun County (Excluding City of Port Lavaca)</td>
<td>4747</td>
<td>21.61%</td>
<td>$ 5,576,865</td>
<td>$ 557,686</td>
<td>$ 83,653</td>
<td>$ 641,339</td>
<td>-0.41746</td>
<td>1.40</td>
<td>$ 135.10</td>
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<tr>
<td>4</td>
<td>GCRPC City of Port Lavaca (77979)</td>
<td>12248</td>
<td>55.76%</td>
<td>$ 14,389,181</td>
<td>$ 1,438,918</td>
<td>$ 215,838</td>
<td>$ 1,654,756</td>
<td>-0.41746</td>
<td>1.40</td>
<td>$ 135.10</td>
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</tbody>
</table>

### Totals For Most Impacted Counties and Zip Codes

- **GCRPC Local Infrastructure Program Method of Distribution Totals For Most Impacted Counties and Zip Codes**: $57,844,336
- **Min SoVI**: -0.817484
- **Unmet Need Plus Resiliency Amount per Capita**: $6,652,099
- **364.43**
<table>
<thead>
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<th>#</th>
<th>COG</th>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties, Cities, and Zip Codes</th>
<th>$ 18,426,069</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Most Impacted Declared Disaster County, City, or Zip Code to Receive at Least 80% Allocation</td>
<td>County or Zip Code July 2016 Population</td>
<td>Distribution Percentage Based on Unmet Need plus Resiliency</td>
</tr>
<tr>
<td>1</td>
<td>GCRPC</td>
<td>Victoria County (Excluding City of Victoria) 26,328</td>
<td>18.64%</td>
</tr>
<tr>
<td></td>
<td>GCRPC</td>
<td>City of Victoria 66139</td>
<td>46.84%</td>
</tr>
<tr>
<td>2</td>
<td>GCRPC</td>
<td>77979 Calhoun County (Excluding City of Port Lavaca) 4747</td>
<td>9.64%</td>
</tr>
<tr>
<td></td>
<td>GCRPC</td>
<td>City of Port Lavaca (77979) 12248</td>
<td>24.88%</td>
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Totals For Most Impacted Counties and Zip Codes: 100% 100% 100% 100%
### GCRPC Local Infrastructure Program Met

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties, Cities, and Zip Codes</th>
<th>Most Impacted Declared Disaster County, City, or Zip Code to Receive at Least 80% Allocation</th>
<th>County or Zip Code July 2016 Population</th>
<th>Minimum $ Allocation if #/Eligible Applicants * Minimum &lt; Funding Available</th>
<th>$ ALLOCATION: Using the 50-40-10 Model With Imposed Distribution Constraints</th>
<th>Funds Left to be Allocated Using Future CDBG-DR Allocations (Max - $ ALLOCATION)</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution % for Entities Not Hitting Max in Distribution #1</th>
<th>New Distribution % for Future Allocation</th>
<th>$ Allocation Using Additional CDBG-DR Distribution #2</th>
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<td>1</td>
<td>GCRPC</td>
<td>Victoria County (Excluding City of Victoria)</td>
<td>$18,426,069</td>
<td>26,328</td>
<td>$100,000</td>
<td>$3,515,651</td>
<td>-</td>
<td>YES</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>2</td>
<td>GCRPC</td>
<td>City of Victoria</td>
<td></td>
<td>66,139</td>
<td>$100,000</td>
<td>$6,056,722</td>
<td>$32,180</td>
<td>NO</td>
<td>33.05%</td>
<td>54.30%</td>
<td>TBD</td>
</tr>
<tr>
<td>3</td>
<td>GCRPC</td>
<td>77979 Calhoun County (Excluding City of Port Lavaca)</td>
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<td>47,476</td>
<td>$100,000</td>
<td>$3,740,301</td>
<td>-</td>
<td>YES</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>4</td>
<td>GCRPC</td>
<td>City of Port Lavaca (77979)</td>
<td></td>
<td>122,486</td>
<td>$100,000</td>
<td>$5,113,395</td>
<td>$11,248</td>
<td>NO</td>
<td>27.81%</td>
<td>45.70%</td>
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</table>

Totals For Most Impacted Counties and Zip Codes: $18,426,069 $43,428 60.86%
### GCRPC Local Infrastructure Program Method of Distribution

<table>
<thead>
<tr>
<th>COG</th>
<th>Initial 20% Allocation of Funds for HUD Impacted Counties</th>
<th>$</th>
<th>17,618,520</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>County or City to Receive 20% Allocation</td>
<td>County or Zip Code July 2016 Population</td>
<td>% of Total County Population</td>
</tr>
<tr>
<td>1</td>
<td>GCRPC Calhoun County, Point Comfort, and Seadrift</td>
<td>2634</td>
<td>11.99%</td>
</tr>
<tr>
<td>2</td>
<td>GCRPC City of Point Comfort</td>
<td>762</td>
<td>3.47%</td>
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<tr>
<td>3</td>
<td>GCRPC City of Seadrift</td>
<td>1574</td>
<td>7.17%</td>
</tr>
<tr>
<td>4</td>
<td>GCRPC DeWitt County (Excluding City of Cuero, City of Yoakum, and City of Yorktown)</td>
<td>2482</td>
<td>11.79%</td>
</tr>
<tr>
<td>5</td>
<td>GCRPC City of Cuero</td>
<td>8429</td>
<td>40.00%</td>
</tr>
<tr>
<td>6</td>
<td>GCRPC City of Yoakum</td>
<td>9685</td>
<td>4.39%</td>
</tr>
<tr>
<td>7</td>
<td>GCRPC City of Yorktown</td>
<td>8104</td>
<td>54.62%</td>
</tr>
<tr>
<td>8</td>
<td>GCRPC City of Goliad</td>
<td>9018</td>
<td>25.10%</td>
</tr>
<tr>
<td>9</td>
<td>GCRPC Goliad County (Excluding City of Goliad)</td>
<td>8800</td>
<td>42.15%</td>
</tr>
<tr>
<td>10</td>
<td>GCRPC City of Goliad</td>
<td>7440</td>
<td>35.64%</td>
</tr>
<tr>
<td>11</td>
<td>GCRPC City of Nixon</td>
<td>1775</td>
<td>12.07%</td>
</tr>
<tr>
<td>12</td>
<td>GCRPC City of Smiley</td>
<td>625</td>
<td>7.25%</td>
</tr>
<tr>
<td>13</td>
<td>GCRPC City of Waelder</td>
<td>1366</td>
<td>9.34%</td>
</tr>
<tr>
<td>14</td>
<td>GCRPC Jackson County (Excluding City of Edna, City of Ganado, and City of La Ward)</td>
<td>14447</td>
<td>72.93%</td>
</tr>
<tr>
<td>15</td>
<td>GCRPC City of Edna</td>
<td>2272</td>
<td>12.98%</td>
</tr>
<tr>
<td>16</td>
<td>GCRPC City of Ganado</td>
<td>932</td>
<td>4.70%</td>
</tr>
<tr>
<td>17</td>
<td>GCRPC City of Shiner</td>
<td>1858</td>
<td>9.38%</td>
</tr>
</tbody>
</table>

| Totals For Impacted Counties and Cities | $ 14,553,428 |

---

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

- Total Local Infrastructure Funding to Distribute: $36,044,589
- Required Minimum Allocation ($100,000/county) Grand Total: $2,200,000
- 20% Allocation Remaining for distribution after required minimum: $15,418,520
- 20% Initial 20% Allocation of Funds for HUD Impacted Counties: $17,618,520
GCRPC Local Infrastructure Program Method

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

| County or City to Receive 20% Allocation | $ 17,618,520 |

<table>
<thead>
<tr>
<th>County or Zip Code July 2016 Population</th>
<th>Unmet Need $ Amount Derived Using 10% Match of Public Assistance Requests</th>
<th>15% Resiliency</th>
<th>Unmet Need $ Amount Plus (+) Resiliency</th>
<th>Raw SoVI</th>
<th>Positive SoVI (1+SoVI - Min SoVI)</th>
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</thead>
<tbody>
<tr>
<td>Calhoun County (excluding City of Point Comfort, City of Seadrift)</td>
<td>2634 $ 309,647 $ 48,412 $ 358,864 $ -0.417463</td>
<td>1.00</td>
<td></td>
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<tr>
<td>DeWitt County (excluding City of Cuero, City of Yoakum, and City of Yorktown)</td>
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<tr>
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<tr>
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<tr>
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<td>City of Hallettsville</td>
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| Totals For Impacted Counties and Cities | $ 1,573,664 |

<p>| Min SoVI | -0.417463 |</p>
<table>
<thead>
<tr>
<th>COG</th>
<th>Initial 20% Allocation of Funds for HUD Impacted Counties</th>
<th>$17,618,520</th>
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<tr>
<td></td>
<td>County or City to Receive 20% Allocation</td>
<td></td>
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<tr>
<td></td>
<td>County or Zip Code July 2016 Population</td>
<td>Estimated Unmet Need Plus Resiliency Amount per Capita</td>
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<td>1</td>
<td>GCRPC: Calhoun County, Point Comfort, and Zip Code 77979</td>
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<tr>
<td>2</td>
<td>GCRPC: City of Point Comfort</td>
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<td>3</td>
<td>GCRPC: City of Seadrift</td>
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<tr>
<td>4</td>
<td>GCRPC: DeWitt County (Excluding City of Cuero, City of Edna, City of Gonzales, City of Nixon, City of Smiley, City of Yoakum, and City of Yorktown)</td>
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</tr>
<tr>
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<td>GCRPC: City of Cuero</td>
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<td>6</td>
<td>GCRPC: City of Edna</td>
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<td>7</td>
<td>GCRPC: City of Gonzales</td>
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<tr>
<td>8</td>
<td>GCRPC: Goliad County (Excluding City of Goliad)</td>
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</tr>
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<td>9</td>
<td>GCRPC: City of Goliad</td>
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<td>10</td>
<td>GCRPC: Gonzales, City of Nixon, City of Seadrift</td>
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<tr>
<td>11</td>
<td>GCRPC: City of Gonzales</td>
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<td>GCRPC: City of Edna</td>
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<td>GCRPC: City of Gonzales</td>
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<td>18</td>
<td>GCRPC: City of La Ward</td>
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<td>19</td>
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<td>20</td>
<td>GCRPC: City of Hallettsville</td>
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<td>GCRPC: City of Mathis</td>
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<td>GCRPC: City of Shame</td>
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<td></td>
<td>Totals For Impacted Counties and Cities</td>
<td>$633,80</td>
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## GCRPC Local Infrastructure Program Method

<table>
<thead>
<tr>
<th>HUD Total Local Infrastructure Funding to Distribute</th>
<th>Required Minimum Allocation</th>
<th>Additional CDBG Allocation</th>
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<tbody>
<tr>
<td>$36,044,589</td>
<td>$2,200,000</td>
<td>$</td>
</tr>
</tbody>
</table>

| 20% Allocation Remaining for distribution after required minimum | $15,418,520 |

### HUD Total Local Infrastructure Fundings

1. **Calhoun County, Point Comfort, and Seadrift**
   - County or City: Calhoun County
   - City: Point Comfort, Seadrift
   - Population: 2634
   - Allocation: $1,286,347
   - Distribution: $109,104
   - Minimum Allocated: $1,000,000
   - Max in Distribution: $13.60%
   - New Allocation: $0.00

2. **City of Seadrift**
   - Population: 1574
   - Allocation: $1,536,581
   - Distribution: $104,979
   - Minimum Allocated: $9.32%
   - Max in Distribution: $14.13
   - New Allocation: $0.00

### COG Initial 20% Allocation of Funds for HUD Impacted Counties

<table>
<thead>
<tr>
<th>COG</th>
<th>Initial 20% Allocation of Funds for HUD Impacted Counties</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>County or City to Receive 20% Allocation</td>
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### County or Zip Code July 2016 Population

<table>
<thead>
<tr>
<th>County or City</th>
<th>Population</th>
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<tbody>
<tr>
<td>Calhoun County</td>
<td>2634</td>
</tr>
<tr>
<td>City of Seadrift</td>
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### Funds Left to be Allocated Using Future CDBG-DR Allocations

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<tr>
<th>County or City</th>
<th>Funds Left</th>
<th>Maximum Allocation Reached?</th>
<th>Original Distribution %</th>
<th>New Distribution %</th>
<th>Original Allocation Using Additional CDBG-DR Distribution</th>
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<tr>
<td>Calhoun County</td>
<td>$1,286,347</td>
<td>NO</td>
<td>13.60%</td>
<td>20.61%</td>
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</tr>
<tr>
<td>City of Seadrift</td>
<td>$1,536,581</td>
<td>NO</td>
<td>9.32%</td>
<td>14.13%</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

### Totals For Impacted Counties and Cities

- **Total**: $17,618,520
- **Total Population**: 551,124
- **65.96%**
- **100%**
- **$0.00**
Resolution
A RESOLUTION AUTHORIZING THE ADOPTION AND SUBMISSION
OF THE GOLDEN CRESCENT REGIONAL METHODS OF DISTRIBUTION
FOR HURRICANE HARVEY (ROUND 1) COMMUNITY DEVELOPMENT BLOCK
GRANT – DISASTER RECOVERY FUNDS

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

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

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

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

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

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

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

WHEREAS, the Golden Crescent Regional Planning Commission is required to allocate 80% of the aforementioned funds to HUD identified Most Impacted Areas and 20% of the aforementioned funds to state identified Impacted Areas; and
WHEREAS, the Golden Crescent Regional Planning Commission is required to inform each eligible entity of the funding requirement that 70% of allocated funds must be utilized on low to moderate income projects; and

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

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

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

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

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

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

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

FURTHER RESOLVED, that Tramer J. Woytek, be and he hereby is authorized to certify the foregoing resolutions and the incumbency and authority of President to execute the Method of Distribution Summary Form for and on behalf of his Regional Planning Commission.
I do further certify that Tramer J. Woytek is the duly elected and serving President of the Golden Crescent Regional Planning Commission Board of Directors and that set forth below is a true and correct example of his signature:

[Signature]
Tramer J. Woytek, President
Golden Crescent Regional Planning Commission

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

[Signature]
Annie Rodriguez
Secretary-Treasurer
Golden Crescent Regional Planning Commission
Citizen Participation Plan
Summary Information

Contact Information


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

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

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

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

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

Citizen and Non-Governmental Organization Outreach

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

GCRPC will engage in Citizen and Non-Governmental Organization (NGO) outreach through 1) the GCRPC website, 2) public notices, and 3) press releases. Citizens and NGOs will be encouraged to review the GCRPC Method of Distribution (MOD) made available through the GCRPC website and participation in scheduled public hearings. Citizens and NGOs may submit written comments to the GCRPC via letter or email. Additionally, citizens and NGOs may comment when attending scheduled public hearings where comments will be recorded.
The following local organizations that provide services or housing for low-to-moderate income persons, including but not limited to, the local Public Housing Authorities, the local Health and Human Services offices, the local mental health and MHMR offices, Community Development Corporations and Community Housing Development Organizations, will receive written notification concerning the date, time, location and topics to be covered at the method of distribution public hearings:

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

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

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

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

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

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

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

Required Meeting and Public Hearing Information

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

Posting of Draft Method of Distribution for Public Review

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

Public Hearings Scheduling Information

Public Planning Meeting – 1st Public Hearing

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

2nd Public Hearing During Comment Period

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

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

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

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

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

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

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

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

**Efforts Exceeding Minimum Participation Requirements**

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

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

Further, an updated draft version of the GCRPC MOD will be posted and maintained on the GCRPC website and available at the GCRPC offices for public review. The GCRPC will request that all local cities and counties post hearing notices in their public areas and have a copy of the MOD available for public review.
Meeting #1 Materials
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

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

AGENDA

PLEASE SILENCE OR TURN OFF ANY CELL PHONES

I. Call Meeting to Order

II. Welcome

III. Introductions

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

V. Public Comment Period #1 Summary

VI. Open Forum/In-Person Public Comments

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

VII. Public Hearing #2 (2 of 2)

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

VIII. Adjournment
<table>
<thead>
<tr>
<th>Name (Print)</th>
<th>Signature</th>
<th>Public Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Betty Collier</td>
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</tr>
<tr>
<td>BARBARA REESE</td>
<td>Barbara Reese</td>
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<td>Kenneth Reese</td>
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<tr>
<td>B. Sperlengel</td>
<td>B. Sperlengel</td>
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<tr>
<td>JOHN KAMINSKI</td>
<td>JOHN KAMINSKI</td>
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COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) FUNDING METHOD OF DISTRIBUTION PUBLIC HEARING #1
PLEASE REMEMBER TO SILENCE OR TURN OFF ANY CELL PHONES
PUBLIC COMMENTS

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

I. Call Meeting to Order
II. Welcome
III. Introductions
IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary
V. Public Comment Period #1 Summary
VI. Open Forum/In-Person Public Comments
VII. Public Hearing #2 (2 of 2)
VIII. Adjournment
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

I. Call Meeting to Order

II. Welcome

III. Introductions
IV. Draft GCRPC CDBG-DR Funding Method of Distribution Summary
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

V. Public Comment Period #1 Summary

VI. Open Forum/In-Person Public Comments
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

VII. Public Hearing #2 (2 of 2)

Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #1 (1 OF 2)

VIII. Adjournment

Thank you.
GOLDEN CRESCENT REGIONAL PLANNING COMMISSION (GCRPC)
PUBLIC COMMENT FORM
Community Development Block Grant Disaster Recovery Funding – Methods of Distribution 2018

**Witness Affirmation – Public Comment Form**

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

**PLEASE PRINT LEGIBLY.**

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

Date of Statement: _______________ Location of Hearing: ______________________

My name is: __________________________________________________________

My occupation, profession or business is: __________________________________

My mailing address is: ___________________________________________________

_____________________________________________________________________

Phone: _______________________________________________________________

In appearing before this body, I represent:

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

_______________________________________________________

Their business address is:

_____________________________________________________________________

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

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

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

X

Signature of Witness

*Note: At the discretion of the Department, the length of time available for each public comment may be limited.*
My name is: ____________________________________________ (please print)
I want to submit my opinion regarding Agenda Item No. ________, but I do **NOT** want to speak:

My position is:

☐ APPROVE MOD as presented
☐ DENY MOD as presented

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

I am Representing:

Myself, my occupation, profession, business: ______________________________________________________

________________________________________

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

________________________________________

Date: ___________________ Signature of Witness: ___________________________
MINUTES

I. Call Meeting to Order – 6:00 p.m.

II. Welcome

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

III. Introductions

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

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

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

I. Homeowner Assistance Program

Funding Available: $55,938,689

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

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

II. Local Buyout and Acquisition Program (LBAP)

Funding Available: $18,430,647

Program Administration:
Local units of government and entities with eminent domain authority will administer this program. GCRPC will develop a method of distribution to allocate funds to all eligible entities (cities, counties, entities with eminent domain authority), per GLO and HUD requirements.
**Eligible Activities:**
Funds may be utilized to -
- buyout or acquire eligible homes at a pre-storm or post-storm fair market value to move homeowner’s out of harm’s way to a lower-risk area;
- Relocation Assistance with buyout or acquisition activities;
- Down-payment Assistance with buyout or acquisition activities;
- Demolition;
- Activities designed to relocated families outside of floodplains;
- Public Service within a 15% cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services);
- Match for FEMA Hazard Mitigation Grant Programs (HMGP).

**Ineligible Activities:**
- Incentive payments to households that move to disaster-impacted floodplains.

**III. Local Infrastructure Program (LIP)**

**Funding Available:**
$36,044,589

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

**Eligible Activities:**
Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:
- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

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

**Draft Method(s) of Distribution:**

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

**V. Public Comment Period #1 Summary**

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

**VI. Open Forum/In-Person Public Comments**

- **BRUCE SPITZENGERL, President, GrantWorks**

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

Response: Entities with eminent domain authority were included in the draft allocation for the LBAP MOD in order to adhere to Texas General Land Office (GLO) Guidelines provided to Counties of Government/Regional Planning Commissions for regional MOD development.
2. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?

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

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

Response: Comment recorded by GCRPC.

- JOHN KAMINSKI, Assistant City Manager, City of Victoria

1. When can public comments be submitted?

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

2. Is there a required format for public comments?

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

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

VII. Public Hearing #2 (2 of 2)
Monday, July 9, 2018
6:00 p.m.
1908 N. Laurent
Victoria Tower Conference Room, 2nd Floor
Victoria, Texas 77901

VIII. Adjournment
7:00 p.m.
PUBLIC HEARING #1 – Public Comment(s) and Response(s) Overview

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

No public comments were received.

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

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

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

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

[No oral response provided. Comment recorded.]

- JOHN KAMINSKI, Assistant City Manager, City of Victoria
  1. When can public comments be submitted?

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

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Ineligible Activities:

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**Public Comments Received:**
No public comments have been received to date.

**Public Comment(s) Responses:**
No responses at this time.
Meeting #2 Materials
PUBLIC HEARING #2 (2 OF 2)

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

AGENDA

PLEASE SILENCE OR TURN OFF ANY CELL PHONES

I. Call Meeting to Order

II. Welcome

III. Introductions

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

V. Public Comment Period #1 Summary

VI. Public Comment Period #2 Summary

VII. Open Forum/In-Person Public Comments

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

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

IX. Adjournment
<table>
<thead>
<tr>
<th>Name (Print)</th>
<th>Signature</th>
<th>Public Comment</th>
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<tbody>
<tr>
<td>1 BARBARA REESE</td>
<td>Barbara Reese</td>
<td>YES</td>
</tr>
<tr>
<td>2 Kenneth Reese</td>
<td>Kenneth Reese</td>
<td>NO</td>
</tr>
<tr>
<td>3 Marett Hones</td>
<td>Marett Hones</td>
<td>YES</td>
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<td>4 Dink Hardwick</td>
<td>Dink Hardwick</td>
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<td>5 Stacy Kirkham</td>
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COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) FUNDING METHODS OF DISTRIBUTION

PUBLIC HEARING #2
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

I. Call Meeting to Order
I. Call Meeting to Order
II. Welcome
III. Introductions
IV. 2nd Draft GCRPC CDBG-DR Funding Method of Distribution Summary
V. Public Comment Period #1 Summary
VI. Public Commend Period #2 Summary
VII. Open Forum/In-Person Public Comments
VIII. Final Draft, Board of Directors Approval, and Submission
IX. Adjournment
II. Welcome
PLEASE REMEMBER TO SILENCE OR TURN OFF ANY CELL PHONES
Golden Crescent Regional Planning Commission

Restrooms
PUBLIC COMMENTS

• Public comments will be accepted in written and oral format
• Please fill out the appropriate form
III. Introductions
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

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

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

Programs

1. Homeowner Assistance Program
2. Local Buyout and Acquisition Program (LBAP)
3. Local Infrastructure Program (LIP)
<table>
<thead>
<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
<th>LMI Amount (70% of Total Allocation)</th>
<th>Total</th>
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<tr>
<td>Homeowner Assistance Program</td>
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<td>$23,281,471</td>
<td>$39,157,082</td>
<td>$55,938,689</td>
</tr>
<tr>
<td>Local Buyout/Acquisition Program</td>
<td>$8,606,577</td>
<td>$9,824,070</td>
<td>$12,901,453</td>
<td>$18,430,647</td>
</tr>
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<td>Local Infrastructure Program</td>
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<td>$17,618,520</td>
<td>$25,231,212</td>
<td>$36,044,589</td>
</tr>
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<td><strong>sub-totals</strong></td>
<td><strong>$59,689,864</strong></td>
<td><strong>$50,724,061</strong></td>
<td><strong>$77,289,748</strong></td>
<td><strong>$110,413,925</strong></td>
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<tr>
<td><strong>Total Regional Allocation</strong></td>
<td></td>
<td></td>
<td></td>
<td>$110,413,925</td>
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</table>
1. Homeowner Assistance Program

$55,938,689

Eligible Activities:

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

Program Administration:

Texas General Land Office
2. Local Buyout and Acquisition Program (LBAP)

$ 18,430,647

Program Administration:
Local units of government and entities with eminent domain authority will administer this program.
2. Local Buyout and Acquisition Program (LBAP)

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

Ineligible Activities:
• Incentive payments to households that move to disaster-impacted floodplains.
2. Local Buyout and Acquisition Program (LBAP)

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<td>$ 9,824,070</td>
<td>$ 12,901,453</td>
<td>$ 18,430,647</td>
</tr>
</tbody>
</table>
2. Local Buyout and Acquisition Program (LBAP)

Method of Distribution Factors, Data, & Parameters:

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

Required $1,000,000 minimum allocation
## 2. Local Buyout and Acquisition Program (LBAP)

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>Description</th>
<th>Allocation</th>
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<tbody>
<tr>
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<td>GCRPC</td>
<td>Victoria County (Excluding City of Victoria)</td>
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<td>GCRPC</td>
<td>77979 Calhoun County: City of Port Lavaca (77979)</td>
<td>$1,761,429</td>
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**Initial 80% Allocation of Funds For HUD Most Impacted Counties & Zip Codes**


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<tr>
<th>#</th>
<th>COG</th>
<th>Description</th>
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<tr>
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<td>GCRPC</td>
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<td>Gonzales County</td>
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<td>GCRPC</td>
<td>Jackson County</td>
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<tr>
<td>10</td>
<td>GCRPC</td>
<td>Lavaca County</td>
<td>$1,199,001</td>
</tr>
</tbody>
</table>

**Initial 20% Allocation of Funds for HUD Impacted Counties**


**80% LBAP Sub-total**

$8,606,577

**20% LBAP Sub-Total**

$9,824,070
3. Local Infrastructure Program (LIP)

$36,044,589

Program Administration:
Local units of government (cities and counties) will administer this program.
3. Local Infrastructure Program (LIP)

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

• Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
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• Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
• Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).
3. Local Infrastructure Program (LIP)

Ineligible Activities:

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

- Funds may not be used to assist a privately-owned utility for any purpose;

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

- No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

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

<table>
<thead>
<tr>
<th>Program</th>
<th>HUD Most Impacted Areas (80%)</th>
<th>State Most Impacted Areas (20%)</th>
<th>LMI Amount (70% of Total Allocation)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Infrastructure Program</td>
<td>$18,426,069</td>
<td>$17,618,520</td>
<td>$25,231,212</td>
<td>$36,044,589</td>
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## 3. Local Infrastructure Program (LIP)

<table>
<thead>
<tr>
<th>#</th>
<th>COG</th>
<th>Initial 80% Allocation of Funds For HUD Most Impacted Counties &amp; Zip Codes</th>
<th>Amount</th>
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<tr>
<td>1</td>
<td>GCRPC</td>
<td>Victoria County (Excluding City of Victoria)</td>
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<tr>
<td>2</td>
<td>GCRPC</td>
<td>City of Victoria</td>
<td>$ 6,056,722</td>
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<tr>
<td>3</td>
<td>GCRPC</td>
<td>77979 Calhoun County (Excluding City of Port Lavaca)</td>
<td>$ 3,740,301</td>
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<tr>
<td>4</td>
<td>GCRPC</td>
<td>City of Port Lavaca (77979)</td>
<td>$ 5,113,395</td>
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<tr>
<td></td>
<td></td>
<td><strong>80% LIP Sub-Total</strong></td>
<td><strong>$ 18,426,069</strong></td>
</tr>
</tbody>
</table>
3. Local Infrastructure Program (LIP)

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

**GCRPC LIP Grand Total(s)** $36,044,589
3. Local Infrastructure Program (LIP)

Method of Distribution Factors, Data, Parameters:

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

Required $100,000 minimum allocation
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

V. Public Comment Period #1 Summary
V. Public Comment Period #1
Summary

• No Public Comments received from June 6\textsuperscript{th} through June 18\textsuperscript{th}, 2018.

• Public Hearing #1 – Public Comments
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VI. Public Comment Period #2 Summary
VI. Public Comment Period #2
Summary

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

• City of Victoria

• Victoria Office of Emergency Management

• Texas Rio Grand Legal Aid, Inc. (Corpus Christi – Pueblo Office)
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VII. Open Forum/In-Person Public Comments
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

VIII. Final Draft, Board of Directors Approval, and Submission
Hurricane Harvey – DR 4332
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding
Regional/Local Methods of Distribution

PUBLIC HEARING #2 (2 OF 2)

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

PUBLIC HEARING #2 (2 OF 2)

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

MINUTES

I. Call Meeting to Order – 6:05 p.m.

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

III. Introductions

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

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

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

I. HOMEOWNER ASSISTANCE PROGRAM

Funding Available:
$55,938,689

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

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

II. LOCAL BUYOUT AND ACQUISITION PROGRAM (LBAP)

Funding Available:
$18,430,647

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

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

**Ineligible Activities:**
- Provide incentive payments to households that move to disaster-impacted floodplains.

### III. LOCAL INFRASTRUCTURE PROGRAM (LIP)

**Funding Available:**
$36,044,589

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

**Eligible Activities:**
Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:
- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within a 15% cap).

**Ineligible Activities:**
- CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
Hurricane Harvey – DR 4332  
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding 
Regional/Local Methods of Distribution 

- Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams; 
- Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects); 
- Ensure the structure is accredited under the FEMA National Flood Insurance Program; 
- Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures. 

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

IV. DRAFT METHOD(S) OF DISTRIBUTION UPDATE:

Draft Methods of Distribution and allocations to eligible entities have been developed by GCRPC for both the Local Buyout and Acquisition Program and the Local Infrastructure Program. The initial Draft Methods of Distribution were developed in adherence to requirements and guidelines set forth by HUD and the GLO. Allocations to eligible entities in the GCRPC region were made using the same formulas and factors utilized by the GLO to allocate funds to the nine regions affected by Hurricane Harvey. This ensures consistency and minimizes any increase in existing margins of error. The formulas utilize U.S. Census Bureau population data, unmet need calculations, FEMA Individual Assistance data, and additional allocation methods required consideration as a result of the minimum required allocation and the number of eligible entities. An allocation that
adheres to HUD and GLO requirements was achieved for the 20% Allocation group by limiting the regional allocation to only eligible counties while still providing for the continued LBAP eligibility of cities and eminent domain authority entities through partnerships with eligible counties.

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

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

V. Public Comment Period #1 Summary

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

- **BRUCE SPITZENGEL**, President, GrantWorks

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

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

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

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

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

  No oral response provided. Comment recorded.

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

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

  Response: At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.
B. Is there a required format for public comments?

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

VI. Public Comment Period #2 Summary

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

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

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

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

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

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

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

The Comptroller’s database only provides info on compliant entities.

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

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

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

1) Hannah Dyal, Staff Attorney at Texas RioGrande Legal Aid, Pueblo Law Center. Email received this morning, July 9, 2018, at 7:43 a.m.
2) Brennan Griffin, Deputy Director, Texas Appleseed. Email received July 9, 2018, at 4:33 p.m.

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

VII. Open Forum/In-Person Public Comments

- Dina Hardwick, Texas RioGrande Legal Aid

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

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

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

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

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

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

- Marett Hanes,

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

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

- Stacy Kirkham, City of Seadrift Resident

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

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

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

  Response: The deadline for submission of MODs is Friday, July 13, 2018. GLO has estimated they may begin responding as early as the last week of July.
C. When will funding be awarded to eligible entities/communities?

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

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

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

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

IX. Adjournment - 7:20 p.m.
Hurricane Harvey – Community Development Block Grant, Disaster Recovery Funding

PUBLIC HEARING #2 - FACT SHEET

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

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

I. Homeowner Assistance Program

**Funding Available:**
$55,938,689

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

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

II. Local Buyout and Acquisition Program (LBAP)

**Funding Available:**
$18,430,647

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

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

III. Local Infrastructure Program (LIP)

Funding Available:
$36,044,589

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

Eligible Activities:
Projects seeking to repair, enhance, and restore infrastructure for communities impacted by Hurricane Harvey as part of a comprehensive long-term recovery program. All activities allowed under CDBG-DR, including but not limited to:
- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

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

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

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

**Public Comment(s) and Response(s):**

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

No public comments were received.

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

- BRUCE SPITZENGEL, President, GrantWorks

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

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

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

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

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

[No oral response provided. Comment recorded.]

- JOHN KAMINSKI, Assistant City Manager, City of Victoria

1. **When can public comments be submitted?**
At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

2. Is there a required format for public comments?

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

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

June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1906 N. Laurent Street
Victoria, TX 77901

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

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled "1.06192018_GCRPC_HH_CDBG-DR.MOD.11.06192018.pdf", primarily address and clarify which entities are eligible to receive funds for the Local Buyout/Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

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

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

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

Respectfully submitted,

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

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

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

The Comptroller’s database only provides info on compliant entities.

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

Ultimately, if a special district with eminent domain authority wishes to participate in buyouts and acquisitions they may. However, in regards to the method of distribution, GCRPC cannot meet HUD and GLO parameters for baseline allocation amounts if every entity with eminent domain authority wants a direct allocation. To remedy this issue, those entities can still collaborate with the cities/counties who will receive an allocation through the Method of Distribution.
On February 9, 2018, the U.S. Department of Housing and Urban Development (HUD) allocated $5,024,215,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to the State of Texas for necessary expenses for activities authorized under Title I of the Housing and Community Development of 1974 related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the “most impacted and distressed” areas affected by Hurricane Harvey.

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

I. HOMEOWNER ASSISTANCE PROGRAM

Funding Available: $55,938,689

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

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

II. LOCAL BUYOUT AND ACQUISITION PROGRAM (LBAP)

Funding Available: $18,430,647

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

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

_Ineligible Activities:_
• Provide incentive payments to households that move to disaster-impacted floodplains.

_III. LOCAL INFRASTRUCTURE PROGRAM (LIP)_

_Funding Available:_
$36,044,589

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

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

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

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

• No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

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

IV. DRAFT METHOD(S) OF DISTRIBUTION:

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

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

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

No public comments were received.

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

• BRUCE SPITZENGEL, President, GrantWorks

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

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

  B. What is the plan for redistribution of de-obligated Community Development Block Grant, Disaster Recovery (CDBG-DR) funds?
Rejected CDBG-DR allocations or any de-obligated CDBG-DR funds will revert to the GLO. Any redistribution of funds will occur at the sole discretion of the GLO.

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

[No oral response provided. Comment recorded.]

- JOHN KAMINSKI, Assistant City Manager, City of Victoria
  
  A. When can public comments be submitted?
  
  At any time throughout the public comment period. The public comment period began on June 3, 2018, and will end at close of business on July 9, 2018.

  B. Is there a required format for public comments?
  
  No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission staff in the task of recording and organizing any comments made.
3.  Public Comment(s) Received from June 19th through July 9th, 2018:

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

   June 27, 2018

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

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

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   Respectfully submitted,

   ![Signature]

   John K. Kaminski  
   Assistant City Manager

   [No response provided. Comment recorded.]

- **RICK MCBRAYER**, Emergency Management Coordinator, Victoria Office of Emergency Management, received 7/3/2018 via email
1. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?

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

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

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

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

¹Housers SAP comments, 7.
²HSAP coms 7.
discrepancy in these figures would be conjectures as very little is publicly available as to what goes into an FVL determination.³

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

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

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

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

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

³ FEMA defines “verified loss” as “the total dollar amount of IHP-eligible real or personal property items of average quality, size, and capacity, as verified by FEMA”; an ambiguous and circuitous definition to say the least. IAPP-G. 67.
⁶ HG 13.
⁷ Texas General Land Office, State Action Plan at 79.
⁸ GCRPC is required to allocate funds in a way that will satisfy “unmet needs.” SAP at 79
portion of the state housing programs. The allocation methodology should therefore be structured to identify which counties are most in need of buyout and acquisition funds.

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

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

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

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

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

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

9 SAP at 17.
10 SAP at 80. The Housing Guidelines include the COGs in its definition of “subrecipients”. HG at 11.
their county or city.

Conclusion

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

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

*Comment 1. GCRPC Response:*

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

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

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

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

*Comment #2 response:*

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

1Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines at 6.
“1. Local Buyout and Acquisition Program
The local buyout and acquisition program will remove homes from harm’s way. [sic]

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

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

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

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

Comment #3 response:
GCRPC is not a sub-recipient of Local Buyout and Acquisition Program or Local Infrastructure Program funds. Thus, this comment goes beyond the scope of GCRPC’s current task(s). Per GLO guidance, eligible entities identified in the MODs are the planned subrecipients tasked with administration of funds for each program. Funding is conditioned on each eligible entity administering these programs in adherence to HUD & GLO priorities, requirements, and guidelines.

All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.
PUBLIC HEARING #2 - FACT SHEET & COMMENT REVIEW

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

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

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

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

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

Response:
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[No oral response provided. Comment recorded.]

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Response:
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Dear Mr. Ada,

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

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

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

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

Respectfully submitted,

John K. Kaminski  
Assistant City Manager

[No response provided. Comment recorded.]

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

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

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

The Comptroller’s database only provides info on compliant entities.

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

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

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

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

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

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

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

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

Response:

The Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines\(^1\) provide:

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

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

\(^1\)Hurricane Harvey – Round 1, Councils of Governments Method of Distribution Guidelines at 6.
The current draft MOD distribute funds to all eligible entities for all eligible activities in order to provide eligible entities with maximum flexibility to administer their respective local programs. Conditions of funding for all eligible entities include the requirement that any entity use 70% of its allocation to benefit Low-to-Moderate Income households, as well as, the requirement that funding be utilized to address HUD and GLO priorities as stated in the Federal Register and State Action Plan.

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

Response:

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

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

A. [A] description of methodology and attached allocation tables do not constitute a MOD according to the “Councils of Government Method of Distribution Guidance” issued by GLO. The required MOD Summary form is not included, so the draft does not document:
   - The Citizen Participation Plan and its implementation;
   - An explanation of how the MOD fosters long term planning and recovery;
   - An explanation of how unmet housing needs will be met; or,
   - How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.

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

Response:

The GLO “required MOD Summary form” is a working document intended to summarize 1) the MOD public development process and 2) the final Draft MOD submitted for review and approval by the GLO. All form responses concisely reiterate the resulting methodology developed throughout the public planning process. GCRPC has published, and continuously updated, draft MOD materials for public review and comment since June 4, 2018. Compliance with GLO
Guidelines will be confirmed by the GLO after the submission of GCRPC MOD Materials on July 13, 2018.

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

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

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

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

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

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

E. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for
example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

Response:

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

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

Response:

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

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

- Dina Hardwick, Texas RioGrande Legal Aid

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

Response:

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

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

Response:

Each entity administering a Local Buyout and Acquisition program will determine which value to utilize.
C. The GLO is currently conducting a Housing Needs Assessment with the assistance of the University of Texas at Austin; where and how will the resulting data from the assessment be utilized?

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

• Marett Hanes,

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

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

• Stacy Kirkham, City of Seadrift Resident

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

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

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

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

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

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

NOTE: All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.
Outreach and Contacts
June 1, 2018

SOLICITATION FOR PUBLIC COMMENT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.
Who: Golden Crescent Regional Planning Commission;
Why: Hurricane Harvey Recovery Funding ($55,475,236) for Home Buyouts and Infrastructure
What: Public Comment Period and Public Hearing Schedule;
When:
Public Comment Period – Open until July 9th.
Monday, June 18, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
Monday, July 9, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
More info available at www.gcrpc.org

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

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

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

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

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Good afternoon all:

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

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

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

Hope this clears up any confusion. It is also in the GCRPC website at www.GCRPC.org
100 W. Walker Street, League City

- Public Planning Meeting Wednesday, June 6, 2018 – 10 a.m. to noon – Houston-Galveston Area Council, Conference Room A, Second Floor, 3555 Timmons Lane, Houston

- Public Planning Meeting Thursday, June 7, 2018 – 5 p.m. to 7 p.m. – Liberty County Community Center, 318 San Jacinto, Liberty

- Public Hearing Thursday, June 28, 2018 – 5 p.m. to 7 p.m. - Courtyard Marriott at Katy Mills, 25402 Kathy Mills Parkway, Katy

- Public Hearing Friday, June 29, 2018 – 10 a.m. to noon – Hilton Homewood Suites, 3000 Interstate 45 North, Conroe

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

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From: Susan Cerf
Sent: Thursday, May 31, 2018 8:40 AM
To: Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>; Alexandra Gamble <Alexandra.Gamble@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>
Subject: RE: COG Public Meeting Dates -- please send

Here is Golden Crescents link
http://www.gcrpc.org

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Susan L. Cerf
Grant Coordinator III | Community Oversight
Community Development & Revitalization
Texas General Land Office
GEORGE P. BUSH, Commissioner
From: Rose Walker  
Sent: Thursday, May 31, 2018 8:32 AM  
To: Susan Cerf <Susan.Cerf@glo.texas.gov>; Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>  
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <ShawnStrange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>; Alexandra Gamble <Alexandra.Gamble@GLO.TEXAS.GOV>; Shawn Strange <ShawnStrange@GLO.TEXAS.GOV>  
Subject: RE: COG Public Meeting Dates -- please send

All,

This link is brand new.

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

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

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

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

I’m open to suggestions.

Thanks,

Rose

From: Susan Cerf  
Sent: Thursday, May 31, 2018 8:23 AM  
To: Mary Elen Williams <MaryElen.Williams@GLO.TEXAS.GOV>; Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>  
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <ShawnStrange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Shelby O’Brien <Shelby.O’Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>  
Subject: RE: COG Public Meeting Dates -- please send

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

What do I need to do to ensure Rose is aware of the Dates etc... I would like to make sure everything is taken care of on my end so we have nothing left hanging.
To: Rose Walker <Rose.Walker@GLO.TEXAS.GOV>; Madison Powell <Madison.Powell@GLO.TEXAS.GOV>; John Blount <John.Blount@glo.texas.gov>; Ty Petty <Ty.Petty@GLO.TEXAS.GOV>
Cc: Ellen Kinsey <Ellen.Kinsey@GLO.TEXAS.GOV>; Shawn Strange <Shawn.Strange@GLO.TEXAS.GOV>; Jonah Chen <Jonah.Chen@glo.texas.gov>; Robert Grimm <Robert.Grimm@GLO.TEXAS.GOV>; Susan Cerf <Susan.Cerf@glo.texas.gov>; Shelby O'Brien <Shelby.O'Brien@GLO.TEXAS.GOV>; Chelsea Buchholtz <ChelseaBuchholtz@glo.texas.gov>
Subject: COG Public Meeting Dates -- please send

Thank you, Rose.

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

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

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

Thank you,

Mary Elen

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

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

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

Newsletter Content Week of 5/21/18
The Houston-Galveston Area Council will be holding public meetings to seek input regarding the proposed Method of Distribution (MOD) to counties and local jurisdictions for buyout/acquisition and infrastructure projects associated with Hurricane Harvey. Harris County and the City of Houston are not included in this allocation and will receive funding directly from the General Land Office.

The public meetings will be held on the following dates:

June 4   - Wharton
June 5 – League City
June 6- H-GAC in Houston
June 28 – Katy
June 29 - Conroe

To learn more please visit:

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

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

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

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

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

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

Confidentiality Note

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Regional Recovery & Resilience Guidance Group Members,

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

Additional MOD documentation can be found on our website homepage at [www.gcrpc.org](http://www.gcrpc.org).

An additional public comment period is being provided beginning August 22, 2018. Public comments will be received in writing until close of business (5:00 pm), September 6, 2018. All public comments must be submitted with the completed Public Comment Form. See attached.
Please feel free to contact myself or Hannah Crone (hannahc@gcrpc.org) with any questions or concerns.

Best Regards,

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

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Dear Housing and Public Health Sector Leadership:

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

Best Regards,
Michael Ada  
Director of Economic Development, Response, & Recovery  
Golden Crescent Regional Planning Commission  
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Fax     (361) 578-6508  

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michaela@gcrpc.org

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

Tracking:

Recipient                   Delivery
'hannahc@gcrpc.org'        Failed: 8/21/2018 4:04 PM
Susan Cerf                 Failed: 8/21/2018 4:04 PM
'Alexandra Gamble'         Failed: 8/21/2018 4:04 PM
'Shawn Strange'            Failed: 8/21/2018 4:04 PM
'Christopher Smith'        Failed: 8/21/2018 4:04 PM
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Golden Crescent Regional Planning Commission  
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From: michaela@gcrpc.org
Sent: Wednesday, August 22, 2018 8:52 AM
To: 'hannahc@gcrpc.org'; Susan Cerf; 'Alexandra Gamble'; 'Shawn Strange'; 'Christopher Smith'; 'Zachary Stern'
Subject: NEW - Additional Public Comment Period - HUD CDBG-DR - Regional Methods of Distribution
Attachments: GCRPC_MOD_PublicCommentForm.pdf

Tracking:

Recipient Read
'hannahc@gcrpc.org'
'Susan Cerf' Read: 8/22/2018 8:54 AM
'Alexandra Gamble'
'Shawn Strange'
'Christopher Smith'
'Zachary Stern'
'Charlotte Baker'
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'lois.kolkhorst@senate.texas.gov'
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'danap@lavacacounty.net'
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'ppolasek@victoriatax.org'
'citymanager@victoriatax.org'
'John Kaminski, Asst. City Manager'
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Dear Elected Officials and Community Leaders:

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

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

In the alternative, the Final MOD documentation will be available to review through our website homepage at www.gcrpc.org by noon today August 22, 2018.
Additionally, we can also share digital copies of all final MOD documentation through other means (i.e. DropBox, separate emails, or other file sharing applications) upon request.

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

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

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

Best Regards,

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

Confidentiality Note

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

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

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

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

Thank you for your consideration.

Best Regards,

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

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UPDATE: HUD-GLO, Hurricane Harvey Regional CDBG-DR Funds Regional Methods of Distribution

07132018_GCRPC_MODSummary_Signed.pdf; 07132018_GCRPC_MOD_CommentResponseSummary.pdf; 07132018_GCRPC_MODNarrative_Submission.pdf
'judgetw@lavacacounty.net'
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'jsoliz@victoriatx.org'
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'annier@jacobs-webber.com'
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'comishjeb@ykc.com'
'countyjudge089@co.gonzales.tx.us'
'gburns@vctx.org'
'weiserlam@gmail.com'
'seadrift@tisc.net'
'comm@lavacacounty.net'
'adaniels@gbna.org'
'cpap@papacek.net'
'richard.randle@co.dewitt.tx.us'
'ajsummers3196@att.net'
'chuck.benavides@goliadtx.net'
'Daryl.fowler@co.dewitt.tx.us'
'pcalhoun@goliadcountytx.gov'
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'bzeller@vctx.org'
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'citysecretary@cityofgonzales.org'
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'smiletyx@gvec.net'
'ppolasek@victoriatx.org'
'cwaeliier@gvct.com'
'annier@jacobs-webber.com'
'yorhtownmayor@sbcglobal.net'
Dear Elected Officials and Community Leaders,

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

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

Thank you for your consideration.

Best Regards,

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

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Regional Recovery & Resilience Guidance Group Members,

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

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

Thank you for your consideration.
Best Regards,

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

These are the document/Public Notices that need to be posted on the GCRPC Website homepage.

For Bill:
The homepage can just have these hyperlinks:

1) “Public Notice – Method of Distribution Development - Hurricane Harvey CDBG-DR Funding
   - English
   - Spanish”

and

2) “6/1/2018 Draft Method of Distribution”

Linked to each appropriate document above – Public notices are labeled English/Spanish.

THANK YOU!!!!

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

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     - Spanish”

and

  2) “6/1/2018 Draft Method of Distribution”

Linked to each appropriate document above – Public notices are labeled English/Spanish.

THANK YOU!!!!

Michael Ada
Director of Economic Development, Response, & Recovery
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Hi Bill,

I double checked the website and the old attachment and hyperlinks are still on the homepage. There are some spelling errors (that are probably my fault) and the PDF linked to the Spanish Public Notice has formatting errors that I did not previously catch. I've attached the correct version of the Spanish Public Notice to replace currently linked PDF and the updated Draft Method of Distribution (PDF dated 06042018).

The corrected hyperlink text should read:

Public Notice – Method of Distribution Development – Hurricane Harvey CDBG-DR Funding – English

Aviso Público - Desarrollo del Método de Distribución - Huracán Harvey Community Development Block Grant Fondos de Recuperación de Desastres (CDBG-DR) – Español

Draft Method of Distribution 06/04/2018

Let me know if you have any questions. Thanks again!

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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Hi Bill,

I have another update for the GCRPC homepage.

The two public notices (English/Spanish) will stay as is, no changes.

You can remove that last hyperlink ("Draft Method of Distribution 06/04/2018") and add the following text/hyperlinks with the attached PDFs:

Draft GCRPC Method of Distribution (Updated 6/7/2018) [no hyperlink]
1. MOD Narrative [link to PDF 1.]
2. Attachment 2 [Link to PDF 2.]
3. Attachment 3 [Link to PDF 3.]
4. Attachment 4 [Link to PDF 4.]
5. $ Distribution Summary [Link to PDF "BOD_GLO-HUD_MOD_ProgramEntityTotals_DRAFT"]

Let me know if you have any questions and thanks in advance!

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

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that any disclosure, copying, distribution, or use of the contents of this information is without authorization and prohibited. If you receive this email in error, please notify us by return email and delete this email immediately.
Good Afternoon Bill,

I’ve got another update for the commission’s homepage.

Is it possible to take the five current documents and consolidate them under a single hyperlink?

If so, the update to the page would consist of that consolidation of old documents and the addition of a single hyperlink that also leads to multiple documents or links.

Remove:

Add:

(*Homepage*)
Draft Method of Distribution Documents (06/04/2018) [hyperlink link to new page #1 with 5 document links currently on the homepage]

Public Hearing #1 Documents (6/18/2018) [hyperlink to another new page with 6 hyperlinks]

(New page #1 – looks like the bottom of the homepage now, actual hyperlinks below copied from current homepage)

Draft Method of Distribution 06/04/2018

1. MOD Narrative
2. Attachment 2
3. Attachment 3
4. Attachment 4
5. Distribution Summary

(New page #2 – using the attached PDFs)
Public Hearing #1, 06/18/2018
Let me know if you have any questions. I know this may be a little confusing as presented.

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

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I took a look and refreshed the page a couple of times. I don’t think the changes were applied. The homepage has not changed.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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Good Morning Bill,

I have another update. This time I’ve attached a word document with the formatting for the home page and new pages. I’ve labeled items “New” if the item does not already exist on the page.

Also, can you give me an estimate of the hours you will invoice for any website work I’ve requested to date?

Thanks and let me know if you have any questions.

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission
Office (361) 578-1587 ext. 204
Fax (361) 578-8508

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Hi Bill,

Just wanted to follow up and make sure you received my request for a website update yesterday. These materials have been distributed via email but I need them posted as soon as possible to adhere to public comment period timelines.

Let me know if you have any questions.

Thanks,

Michael Ada
Director of Economic Development, Response, & Recovery
Golden Crescent Regional Planning Commission

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Michael Ada  
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Looks good and it’s all working.

Thanks Bill!!

Michael Ada  
Director of Economic Development, Response, & Recovery  
Golden Crescent Regional Planning Commission

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Hi Bill,

Can you update the website homepage with the following:

[UPDATE to Page 5 – See Attachments (attached in order) and link to each item below]

Public Hearing #2 Documents (7/9/2018)

1) Agenda
2) PowerPoint Presentation
3) Public Hearing #2 Fact Sheet
4) Sign-In Sheet
5) Federal Register / Vol. 83, No. 28 / Friday, February 9, 2018 / Notices
6) GLO – Councils of Governments Method of Distribution Guidelines
7) MOD Spreadsheets

Let me know if you have any questions.

Thanks!

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

**Golden Crescent Regional Planning**
1908 N. Laurent St
Suite 600
VICTORIA, TX 77901

**Acct #:** 02103244
**Phone:** (361) 578-1587
**Date:** 06/30/2018
**Due Date:** 07/20/2018

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**Remarks**

Reserve your spot in the 2018 High School Sports Preview for Inland and Coastal editions!

**TERMS:** Account due in full by 20th of the following month.

**Total Due:** $1,071.00
SOLICITATION FOR PUBLIC COMMENT

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

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

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

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

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

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

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

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

SOLICITUD DE COMENTARIO PÚBLICO

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

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

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

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

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

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

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

Para solicitudes de alojamiento o información adicional sobre esta publicación, llame al (361) 578-1587.
TO  
LOLLIE  
GOLDEN CRESCENT  
CINDY CORNISH  
1908 N. LAURENT SUITE 600  
VICTORIA, TX 77901

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Current Due: 588.00  
1-30 Days Past Due: 640.50  
31-60 Days Past Due: 0.00  
61-90 Days Past Due: 0.00  
90+ Days Past Due: 0.00  
Amount Due: $1,228.50
AFFIDAVIT OF PUBLICATION

STATE OF TEXAS

COUNTY OF GONZALES

Before me, the undersigned authority, on this day personally appeared

TERRY FITZWATER ______________________, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the PUBLISHER ______________________
(title of newspaper representative)

of the GONZALES INQUIRER ______________________; that said newspaper is generally circulated
(name of newspaper)

in GONZALES ______________________, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

Jun 21, 2018

(subscriber’s signature)

Subscribed and sworn to before me this the 21st day of July, 2018,
to certify which witness my hand and seal of office.

(Seal)

Sanya D. Harkey
Print or Type Name of Notary Public

June 6, 2021
My Commission Expires
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For accommodation requests or additional information about this posting, please call (361) 578-1587.

Serving Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca and Victoria counties
Equal Opportunity / Affirmative Action Employer

SOLICITUD DE COMENTARIO PÚBLICO

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

Los comentarios orales y escritos sobre el método de distribución se tomarán en audiencias públicas programadas para las siguientes fechas, horarios, y lugares:
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- Lunes, el día 19 de julio del año 2018, a la hora 9:00 a.m. en la calle 120 S. Main; segundo piso, en la Sala de Conferencias de Sam Houston, Victoria, Texas, 77901.

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for the following dates, times, and locations:

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Equal Opportunity / Affirmative Action: Employer

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GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en inmuebles. Las solicitudes de personas que necesiten
To:
Golden Crescent Regional Planning Commission
1908 N Laurent
Ste 600
Victoria, TX 77901

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NOTICIAS DE COMENTARIO PÚBLICO

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Atención: Michael Ada, director de desarrollo económico, por la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

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SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for $55,475,235 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

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

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

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- GCRPC, por la calle 1908 N. Laurent, Suite 630, Victoria, Texas, 77901.

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# Statement of Account

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LISA CORTINAS  
GOLDEN CRESCENT REGIONAL PLANNING COMMISSION  
1908 N. Laurent Street  
Suite 600  
VICTORIA, TX 77901

NET 10 DAYS. A late payment penalty of 1.5% per month will be added to charges past 30 days. Return the attached remittance stub with your payment. If you have any questions concerning this statement, contact our billing office at 361-782-3547.

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Payments and Applications

$136.50 applied to: Inv. 81846, 05/09/2018, HEALTHY AGING

Total Due: $1,344.00

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**Jackson County Herald Tribune**  
Payment Remittance - Detach and Send This Stub With Your Payment

**Advertiser Information**

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06/30/2018 |  
Remit To: Jackson County Herald Tribune  
Attn: Credit Department  
306 N. Wells  
Edna, TX 77957

LISA CORTINAS  
GOLDEN CRESCENT REGIONAL PLANNING COMMISSION  
1908 N. Laurent Street  
Suite 600  
VICTORIA, TX 77901
Top 10 seniors recognized by

The Industrial Education Foundation, along with In-teplast Group, hosted the 7th annual Academic Recognition and Awards Luncheon at In-teplast Café on Tuesday, May 22.

The event honored the top 10 students in the 2018 graduating class of the Industrial Independent School District High School along with their inspirational educators. Each top 10 graduate submitted written essays on one teacher that influenced them the most during their journey through the Industrial District.

Tears were shed and memories shared as each graduate’s moving testimony was read expressing appreciation for teachers, coaches, and other staff. The graduates and selected educators included: Lexey Mikulec — Chasity Matula, Jaron Hayden — Cheryl Weixelman, Kenneth (Jay) Densman — Sarah Bradley, Chessali Sackett — Lisa Bullock, Katrina Wisoski — Miriam Patton, Karagan — Anne McCain, Regan — Jenna Trebybig, Daniel zales — Zachery Marlow, Darlek — Melody Vu — Sam Smith — Kensey Allman Smith shared an essay that Mr. Kensey A “impact extended far beyond the football field. Furthermore, the example he set will influence how the rest of my life”. Reagan Doyle was pro

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GOLDEN CRESCENT REGIONAL PLANNING COMMISSION
1908 N Laurent, Suite 600, Victoria, TX 77901
(361) 578-1587 / Fax (361) 578-8865
www.gcrpc.org
Golden Crescent Economic Development District

June 1, 2018

SOLICITATION FOR PUBLIC COMMENT

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Serving Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca and Victoria counties
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say that Ms. Jenna Treybig was “always supportive through the ups and downs and I will be forever grateful for the impact she has had on my life.”

Chesali Sackett chose Ms. Lisa Bullock as her favorite teacher and wrote that “Ms. Bullock has impacted my high school years greatly. She taught me to believe in myself and my capabilities.”

All of the students shared the love and appreciation that they had for their favorite educator. IEF’s mission is to provide resources that enrich teaching, inspire learning and skills development, and maximize innovation opportunities for all teachers and students—the mission coming to life is clearly visible on a day where students and staff are honored for their accomplishments. IEF would like to take this opportunity to thank all of community businesses and individuals that support the organization.

ISD Superintendent Paul Darilek closed the event sharing that he was thankful to everyone in the district for this year’s efforts. Darilek expressed sincere thanks “for taking in Chloe, a new senior to this class, and making her senior year wonderful. This first year at Industrial was exhausting, yet invigorating, and we are proud to be a part of the Cobra tradition.”

GOLDEN CRESCENT REGIONAL PLANNING COMMISSION
1908 N. Laurent, Suite 600, Victoria, TX 77901
(361) 578-1587 / Fax (361) 578-8865
www.gcrpc.org
Golden Crescent Economic Development District

SOLICITUD DE COMENTARIO PÚBLICO

Se da aviso que el Golden Crescent Regional Planning Commission (GCRPC) (Comisión de planificación regional de la red de la Luna Dorada) está buscando aportes del público sobre el método de distribución para $55,475,236 de HURACAN Harvey Community Development Block Grant (Huracán Harvey desarrollo comunitario Block Grant) Fondos de Recuperación de Daños.

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

I’ve attached some items related to Disaster Recovery Funding that has been allocated to our region through the Department of Housing and Urban Development (HUD) and the Texas General Land Office for your information.

GCRPC has been tasked with developing a method of distribution for the funding and conducting public hearings throughout a public comment period.

These funds are to be utilized for the Home Buyout and Acquisition Program and the Local Infrastructure Program.

We welcome any and all comments regarding this project.
Additionally, GCRPC has finally acquired access to technology that may make it easier for everyone to participate in future Guidance Group activities. Skype for business will provide webinar/web conference capability for the group as we move forward. Be on the lookout for an invitation to join us for our next meeting.

Again, thanks for your participation in Guidance Group activities and please let me know if you have any questions or concerns.

Best Regards,

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

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amorales@goliadcountytx.gov
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monmac@tisd.net
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perezb40@yahoo.com
comishjeb@ykc.com
countyjudge089@co.gonzales.tx.us
gburns@vctx.org
wedieriam@gmail.com
seadrift@tisd.net
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bzeller@vctx.org
mayor@cityofcuero.com
cityoffedn@cityoffedn.com
Ganado@cityofganado.com
citysecretary@cityofgonzales.org
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Koch_m@yahoo.com
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cityofnordheim@att.net
pccmayor2016@yahoo.com
indianootrader@yahoo.com
fredhilscher@sbcglobal.net
smileyx@gvcc.net
ppolasek@victoriatx.org
cwaelder@gvtc.com
Dear Elected Officials and Community Leaders,

Kristi K Rogers
Daryl Fowler
Susan Cerf
John Barth
Adrian Cannady
Annie Rodriguez
Gabriela Torres
hannahc@gcpc.org
Gary Burns
Richard Randle

Read: 6/8/2018 10:50 AM
Read: 6/8/2018 9:05 AM
Read: 6/7/2018 6:24 PM
Read: 6/7/2018 3:58 PM
Read: 6/7/2018 3:21 PM
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Read: 6/7/2018 2:56 PM
Read: 6/7/2018 2:51 PM
Deleted: 6/12/2018 9:35 AM
Deleted: 6/26/2018 1:35 PM
The Golden Crescent Regional Planning Commission (GCRPC) was tasked by the Texas General Land Office (GLO) to develop Methods of Distribution (MODs) for Community Development Block Grant – Disaster Recovery Funding allocated to our seven county region in response to Hurricane Harvey.

The attached documents are being provided to insure you have the most recent versions of the Draft MODs and associated MOD Attachments. Additionally, copies of the English/Spanish Public Notices, released to encourage public participation in the MOD development process, have been included for your review, distribution, and posting in public spaces as you see fit. These public notices are currently being run in newspapers regionwide throughout the entire public comment period beginning June 3rd and ending on July 9th.

Let me know if you have any questions or comments regarding these materials or the MOD process.

Best Regards,

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

Confidentiality Note

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

The Golden Crescent Regional Planning Commission (GCRPC) was tasked by the Texas General Land Office (GLO) to develop Methods of Distribution (MODs) for Community Development Block Grant – Disaster Recovery Funding allocated to our seven county region in response to Hurricane Harvey.

The attached documents are being provided to insure you have the most recent versions of the Draft MODs and associated MOD Attachments. Additionally, copies of the English/Spanish Public Notices, released to encourage public participation in the MOD development process, have been included for your review, distribution, and posting in public spaces as you see fit. These public notices are currently being run in newspapers regionwide throughout the entire public comment period beginning June 3rd, and ending on July 9th. MOD materials will be periodically updated and posted on our website homepage at www.gcrpc.org.

Let me know if you have any questions or comments regarding these materials or the MOD process.
Best Regards,

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Director of Economic Development, Response, & Recovery
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Regional Recovery & Resilience Guidance Group Members,

The attached documentation is being provided to you for your consideration as community leaders, members of the public, and members of the Guidance Group.

The public comment period began on Sunday June 3, 2018 and will end on July 9, 2018, at 5:00 p.m..

These Methods of Distribution (MODs) concern over $54 million in federal funding for Hurricane Harvey related Housing Buyouts and Acquisitions, as well as, Local Infrastructure Projects. There have been changes made to the previously published MODs as a result of errors found, public comments, and amended/clarified Texas General Land Office guidance.

Additional documentation is available through our website homepage at www.gcrpc.org. Feel free to contact me if you have any questions or if you wish to submit public comment(s).

Best Regards,
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michaela@gcrpc.org

From: michaela@gcrpc.org
Sent: Monday, June 25, 2018 11:51 AM
To: 'hannahc@gcrpc.org'; 'melodyl@gcrpc.org'
Cc: 'Susan Cerf'
Subject: UPDATE - HUD CDBG-DR - Regional Method of Distribution
Attachments:
HUGLO_HH_CDBG-DR_2018_GCRPC-MOD_Ver2.pdf; 1. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf; 2. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment2-LBAPMODDetail.pdf; 3. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment3-LIPMODDetail.pdf; 4. 06192018_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT_Attachment4-DataSource.pdf

Tracking:
Recipient Read
'hannahc@gcrpc.org'
'melodyl@gcrpc.org'
'Susan Cerf'
Charlotte Baker
'mike.pfeifer@calhounco.tx.org'
'lois.kolkersterson@senate.texas.gov'
'geanie.morrison@house.texas.gov'
'pcmce2016@yahoo.com'
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'office@yorktowntx.com'
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John Kaminski, Asst. City Manager
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Dear Elected Officials and Community Leaders:


The attached documentation is an update to the previously published Draft Regional Methods of Distribution (MODs). As a reminder, the public comment period began on Sunday June 3, 2018 and will end on July 9, 2018, at 5:00 p.m. GCRPC will conduct its second public hearing concerning these MODs on Monday, July 9, 2018.

These Methods of Distribution (MODs) concern over $54 million in federal funding for Hurricane Harvey related Housing Buyouts and Acquisitions, as well as, Local Infrastructure Projects.

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Best Regards,

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Golden Crescent Regional Planning Commission  
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SOLICITATION FOR PUBLIC COMMENT

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

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

- Monday, June 11, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.
- Monday, July 9, 2018, at 6:00 p.m. at the Victoria Tower Conference Room located at 1908 N. Laurent, 2nd Floor, Victoria, Texas, 77901.

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m. on Monday, July 9, 2018. All comments will be considered and made public at the Method of Distribution hearing.

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

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

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

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

SOLICITACIÓN DE COMENTARIO PÚBLICO

Se da aviso que el Comité Regional de Planificación (GCRPC) (Comisión de planificación regional de la comuna localizada en la ciudad de Victoria en Texas) está buscando aportes del público sobre el método de distribución para $55,475,236 de fondos de recuperación de desastres de la tormenta Harvey (Huracán Harvey Development Block Grant - Fondo de Recuperación de Desastres).

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

- Lunes, el día 18 de junio del año 2018, a la hora 9:00 a.m. en la Sala de Conferencias en la Torre Victoria, situada en la calle 1908 N. Laurent, 2ª Planta, Victoria, Texas, 77901.
- Lunes, el día 19 de julio del año 2018, a la hora 9:00 a.m. en la Sala de Conferencias en la Torre Victoria, situada en la calle 120 S. Main, 2ª Planta, Victoria, Texas, 77901.

El GCRPC recibirá comentarios adicionales por escrito desde el lunes, el día 4 de junio del año 2018, hasta el viernes, el día 9 de julio del mismo año. Los comentarios escritos deben hacerse a más tardar a la hora 5:00 p.m. del viernes, el día 7 de julio del año 2018. Atención: Michael Adra, director de desarrollo económico, en la calle 1908 N. Laurent, Suite 600, Victoria, Texas, 77901.

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

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

GCRPC proporcionará adaptaciones razonables para las personas que asisten a las audiencias públicas de GCRPC. Las audiencias públicas se llevarán a cabo en Inglés. Las solicitudes de personas que necesitan adaptaciones especiales, solicitudes de interprétedes de idiomas, o solicitudes para otras necesidades especiales de comunicación se deben realizar al menos 48 horas antes de cada audiencia. Para solicitudes de aclaración o información adicional sobre esta publicación, llame al (361) 578-1587.

LAVACA COUNTY CRIME STOPPERS

Crime of the Week

Lavaca County Crime Stoppers Serving and Protecting the Citizens and Businesses of Lavaca County

The following subjects have warrants for their arrests:

- Angel Aguayo, w/m (dob 09/08/95)
- Santo Portillo, w/m (dob 04/17/81)
- Brenda Beltran Rosales, o/f (dob 08/01/72)

If you have information on the current location of these subjects, call Lavaca County Crime Stoppers at (361) 594-3700 for a cash reward.

Any information you give will remain confidential, including your identity.

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Port Lavaca TX 77979

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### BILLED ACCOUNT

**GOLDEN CRESCENT REGIONAL PLANNING COMMISSION**
1908 N. LAURENT, STE 600
VICTORIA, TX 77901

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**GOLDEN CRESCENT REGIONAL PLANNING COMMISSION**

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**TERMS - NET 30 DAYS. ALL PAST DUE CHARGES ARE SUBJECT TO A SERVICE CHARGE OF 1.5% PER**

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PO Box 88
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PUBLISHER’S AFFIDAVIT

THE STATE OF TEXAS §
COUNTY OF CALHOUN §

Schelly Bartels, being duly sworn on his/her oath states that he/she is an authorized representative of The Port Lavaca Wave and that said newspaper meets the requirements of Section 2051.044 of the Texas Government code, to wit:

1. It devotes not less than twenty-five percent (25%) of its total column lineage to general interest items;

2. It is published at least once each week;

3. It is entered as second-class postal matter in the county where it is published;

4. It has been published regularly and continuously since 1891;

5. It is generally circulated within Calhoun County.

Representative further deposes and says that the attached notice was published in said newspaper on the following date(s) to wit:

4/6, 6/13, 6/20, 6/27, 7/4 A.D. 2018

SUBSCRIBED AND SWORN BEFORE ME by

Schelly Bartels

X a) is personally known to me, or
b) provided the following evidence to establish his or her identity

On this the 5 day of July, A.D. 2018, to certify which witness my hand and seal of office

Judy Marek  
Notary Public, State of Texas
SOLICITUD DE COMENTARIO PÚBLICO

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

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

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

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

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

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

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

Para solicitudes de albergue o información adicional sobre esta publicación, llame al (361) 578-1587.
June 18, 2018

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to the community,” said Glenn. “I feel confident that there are great things ahead and I’m eager to take advantage of all the skills and abilities that are already there.”

Pending approval from the UH System Board of Regents, Glenn is expected to succeed Vic Morgan. Last year, Morgan announced he would retire as UHV president in fall 2018. He took the reins as interim president in 2014 and was named president in 2016.

A thorough and exhaustive national search was conducted to fill the UHV presidency, chaired by former UH System Regent Roger Welder and Dona Cornell, vice chancellor of legal affairs and general counsel for the UH System. Aided by an executive search firm, the presidential search committee— which includes representatives to become the director of student services. His father, grandfather and great-grandfather all attended the school. He received a Master and concentrations in the arts and sciences, business administration, education, health professions and human development fields.

SOLICITATION FOR PUBLIC COMMENT

Notice is hereby given that the Golden Crescent Regional Planning Commission (GCRPC) is seeking input on the method of distribution for $35,475,236 in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Funds.

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

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

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

Additional written comments will be received by the GCRPC from Monday, June 4, 2018, through Monday, July 9, 2018. Written comments must be received no later than 5:00 p.m., on Monday, July 9, 2018, Attn: Michael Ada, Director of Economic Development, 1908 N. Laurent, Suite 600, Victoria, Texas, 77901. A Draft Method of Distribution will be posted on Monday, June 4, 2018 at 12:00 a.m. on the Internet website, www.gcrpc.org, and will be available for review at the following locations:

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

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

For accommodation requests or additional information about this posting, please call (361) 578-1587.
Public Comments
I. PUBLIC COMMENT(S) RECEIVED FROM JUNE 6TH THROUGH JUNE 18TH, 2018:

No public comments received.

II. ORAL PUBLIC COMMENT(S) RECEIVED AND RESPONSES GIVEN DURING PUBLIC HEARING#1:

• BRUCE SPITZENGL, President, GrantWorks

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

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

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

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

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

  [No oral response provided. Comment recorded.]

• JOHN KAMINSKI, Assistant City Manager, City of Victoria

  1. When can public comments be submitted?

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

  2. Is there a required format for public comments?
Response:

No. Public comments can be provided in any oral or written formats in order to encourage public participation. Public comment forms are provided at public hearings to assist Golden Crescent Regional Planning Commission (GCRPC) staff in the task of recording and organizing any comments made.
III. PUBLIC COMMENT(S) RECEIVED FROM JUNE 19TH THROUGH JULY 9TH, 2018:

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

June 27, 2018

Michael Ada
Director of Economic Development
Golden Crescent Regional Planning Commission
1906 N. Laurent Street
Victoria, TX 77901

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

Dear Mr. Ada,

The City of Victoria appreciates and supports the revisions that have been made to the proposed Method of Distribution (MOD) in response to public comments received at the first Public Hearing on June 18, 2018. These changes, reflected in the revised version of your document titled “1.08192016_GCRPC_HH_CDBG-DR_MOD_Narrative_DRAFT.pdf”, primarily address and clarify which entities are eligible to receive funds for the Local Buyout/ Acquisition (LBAP) and Local Infrastructure (LIP) programs, and modify the distribution of funds among eligible entities.

The City of Victoria has one additional comment on the revised version of the proposed MOD. Our comment is in regards to the proposed reallocation method for LBAP and LIP funds. The revised MOD states “Reallocation of LBAP funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region.” The same language is repeated in the reallocation paragraph for LIP funds. It is respectfully requested that the GLO consider first reallocating such funds at the County level before returning them to the region-wide 60% pool.

Within Victoria County, the City and County of Victoria are the only two entities to receive LBAP and LIP funding through the revised MOD. It is our belief that if either of these two entities fails to utilize their full allocation of funds, the other entity within the County should have an opportunity to apply for such de-obligated funds before they are rolled back into the region-wide 60% allocation.

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

Respectfully submitted,

John K. Kaminski
Assistant City Manager

[No response provided. Comment recorded.]

- RICK MCBRAYER, Emergency Management Coordinator, Victoria Office of Emergency Management, received 7/3/2018 via email
A. Is there an explanation for why Bloomington Independent School District, the water control districts, or the Port of Victoria are not included in the Method of Distribution?

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

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

The Comptroller’s database only provides info on compliant entities.

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

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

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

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

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

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

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

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

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

“1. Local Buyout and Acquisition Program
The local buyout and acquisition program will remove homes from harm’s way. [sic]

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

GCRPC has established the draft objective criteria for allocation of funds to the various eligible entities according to the GLO requirements stated above. Population data, FEMA Individual Assistance Data, Unmet Need calculations, Social Vulnerability data, and a resilience factor are the objective criteria utilized.
The current draft MOD distribute funds to all eligible entities for all eligible activities in order to provide eligible entities with maximum flexibility to administer their respective local programs. Conditions of funding for all eligible entities include the requirement that any entity use 70% of its allocation to benefit Low-to-Moderate Income households, as well as, the requirement that funding be utilized to address HUD and GLO priorities as stated in the Federal Register and State Action Plan.

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

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

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

  A. [A] description of methodology and attached allocation tables do not constitute a MOD according to the “Councils of Government Method of Distribution Guidance” issued by GLO. The required MOD Summary form is not included, so the draft does not document:
  - The Citizen Participation Plan and its implementation;
  - An explanation of how the MOD fosters long term planning and recovery;
  - An explanation of how unmet housing needs will be met; or,
  - How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.

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

Response:
The GLO “required MOD Summary form” is a working document intended to summarize 1) the MOD public development process and 2) the final Draft MOD submitted for review and approval by the GLO. All form responses concisely reiterate the resulting methodology developed throughout the public planning process. GCRPC has published, and continuously updated, draft
MOD materials for public review and comment since June 4, 2018. Compliance with GLO Guidelines will be confirmed by the GLO after the submission of GCRPC MOD Materials on July 13, 2018.

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

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

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

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

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

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

E. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously
enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

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

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

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

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

- Dina Hardwick, Texas RioGrande Legal Aid

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

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

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

Response:
Each entity administering a Local Buyout and Acquisition program will determine which value to utilize.
C. The GLO is currently conducting a Housing Needs Assessment with the assistance of the University of Texas at Austin; where and how will the resulting data from the assessment be utilized?

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

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

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

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

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

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

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

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

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

NOTE: All comments and questions collected throughout the MOD development process and any responses are being forwarded to the GLO and HUD for further review.
Golden Crescent Regional Planning Commission  
Attn: Michael Ada, Director of Economic Development  
1908 N. Laurent, Suite 600  
Victoria, Texas, 77901  
Submitted via email to: michaela@gcrpc.org

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

Dear Mr. Ada,

We appreciate the opportunity to provide comments on the GCRPC Plan for Disaster Recovery: Hurricane Harvey, covering $110,413,925 in Community Development Block Grant for Disaster Recovery (CDBG-DR) funds allocated by the U.S. Department of Housing and Urban Development (HUD) by Federal Register Notice, 83 F.R. 5844, February 9, 2018.

Texas Appleseed is a public interest justice center that works to change unjust laws and policies that prevent Texans from realizing their full potential. Since Hurricanes Katrina and Rita in 2005, Texas Appleseed has worked with a network of organizations in Texas, including housing advocates, policy experts, and grassroots community groups, to ensure that all Texas families are able to recover in the wake of a natural disaster, that communities are rebuilt to be more resilient, and that all families have the opportunity to live in safe, decent neighborhoods with equal access to educational and economic opportunity.

While we appreciate the detailed explanation of GCRPC’s methodology, a description of methodology and attached allocation tables do not constitute a MOD according to the “Councils of Government Method of Distribution Guidance” issued by GLO. The required MOD Summary form is not included, so the draft does not document:
- The Citizen Participation Plan and its implementation;
- An explanation of how the MOD fosters long term planning and recovery;
- An explanation of how unmet housing needs will be met; or,
- How GCRPC will meet its LMI benefit and affirmatively furthering fair housing obligations.

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

While GCRPC has not yet published a draft MOD, we offer the following comments for that draft MOD:

A. Local Buyout and Acquisition Program:

The Buyout and Acquisition Program’s allocation methodology is seriously flawed.

First, it assumes damage weights will reflect the suitability of these areas for buyouts. Within the GCRPC region, the majority of Harvey damage claims appear to be caused by wind and not...
flooding, which is not the case in all parts of the disaster area. This is based on the damage claims map provided in the state Action Plan. For those wind-damaged units, buyouts will not solve the problem, which is why it is necessary to distinguish whether the FVL was caused by wind or flooding in order to truly consider suitability of damaged homes for buyouts.

Second, local jurisdictions and GCRPC must make use of data available through the National Flood Insurance Program about concentrations of repetitive loss properties in order to allocate this funding. The Community Rating System (CRS) offers jurisdictions advice on locating concentration areas of repetitive loss properties, collecting remote data on these properties and determining the cause of the ongoing flooding problems there. This type of investigation will be essential in locating areas that are suited to buyouts, as opposed to individual homes that were damaged and should be rebuild with mitigation in mind or areas where poor infrastructure is to blame.

Program guidelines for this buyout program must be developed in a transparent process with extensive community input. Local communities must have a citizen participation process for drafting buyout guidelines. Regardless of whether these planned buyouts are voluntary or
mandatory, relocating, away from an existing community or a home that has been in a family for generations, can be difficult and even traumatic. Without planning and community buy-in, a voluntary individual buyout program can result in a patchwork of empty and occupied homes, creating a blighted neighborhood. One of the critical issues in ensuring a successful buyout program is equity and ensuring that program rules and processes do not have a disparate impact on particular groups of homeowners.

Local buyout and acquisition programs must also prioritize LMI households in floodways and floodplains, who have the least resources with which to relocate on their own, leaving them a choice between housing instability and potential homelessness, or continuing to live in homes that may be structurally compromised or present health risks because of mold. It is particularly critical for LMI families that this buyout program includes not only acquisition and demolition, but relocation payments and other assistance and incentives as well. As the Federal Register Notice states, “a buyout program that merely pays homeowners to leave their existing homes does not result in a low- and moderate-income household occupying a residential structure and, thus, cannot meet the requirements of the LMH national objective.” (83 FR 5863) Local buyout programs should include plans to build housing in safer areas.

Low- and moderate-income households must be provided with enough funds that the choice to move is a realistic one (or to ensure that they can actually move to a safer area in the case of mandatory buyouts.) The worst-case scenario is that families who accept a buyout are unable to find housing in safer areas and are forced to move back into their original or less safe neighborhoods.

The decision of whether to use pre- or post-storm home value is an important one. In particular, using the pre-storm value of a home to determine disaster recovery program benefit limits often has a discriminatory impact on the basis of race or ethnicity as well. Following Hurricane Katrina, the National Fair Housing Alliance (NFHA), the Greater New Orleans Fair Housing Action Center (GNOFAC), and African-American homeowners sued the State of Louisiana and the U.S. Department of Housing and Urban Development (HUD) alleging racial discrimination in the State’s CDBG-DR funded Road Home Program, which provided grants to homeowners to repair or rebuild their homes. The original grant formula was based on the pre-storm value of a home, which resulted in African-American homeowners receiving less repair money than White homeowners, because their homes were located in neighborhoods with lower home values based on market discrimination and the legacy of segregation. Many African-American families were left unable to complete repairs or return home or living in uninhabitable houses. As Louisiana Congressman Cedric Richmond said when the case was settled in 2011, [e]veryone knew that the Road Home formula for calculating grant awards was deeply flawed and punished folks in neighborhoods where home values were lower. . . After all, if two families are both rebuilding a three bedroom home then their construction costs will be the same—regardless of the neighborhood. In that case, each family deserves the same assistance from their government. Unfortunately, the flawed formula was effectively discriminatory, locking many families out of equitable assistance.
GCRPC’s and local program guidelines must ensure that buyout and acquisition programs are consistent regardless of whether the cost is funded by FEMA or CDBG-DR. CDBG-DR funding could be used to provide additional funds for LMI families in FEMA programs that would not provide them with enough funding to move, for example. GCRPC should be particularly careful that they are not using a program that provides lesser benefits to serve communities and homeowners of color. **Local program guidelines must be identical, no family should have unequal access to disaster recovery simply because of where they live.** We recommend that GCRPC, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions, and that an accountability system is set up to make sure that local jurisdictions are abiding by the program guidelines.

We are also concerned that GCRPC has chosen to use the threshold allocation of $1,000,000 as a cap on local buyout programs. Small amounts of funding are not sufficient to engage in a well-planned buyout program that does not result in “checker-boarding” of neighborhoods or strain resources and city services (due to the continued need to serve areas that have been partially bought out). One million dollars, which is the cutoff for any jurisdiction to receive its own buyout funding (before it is rolled up to the next highest jurisdiction) is not enough to fund a significant buyout program that doesn’t exacerbate these problems. Buyout programs need to be concentrated in areas that have repetitive flood losses that can only be addressed through an organized acquisition program that offers households sufficient money to move to an equivalent home in a safer area.

**B. Local Infrastructure Program**

Resilience is the ability to withstand and recover from disasters quickly, in a way that mitigates future damage and vulnerability, and in a way that goes beyond physical infrastructure. We commend GCRPC for considering the important role that resiliency has within this recovery process. Low-income communities and communities of color are disproportionately affected by and have a harder time recovering from a disaster because of both geographic and social vulnerability forced on them by segregation, discrimination, and often the cumulative effects of previous disasters, on wealth and access to opportunity. For its Natural Disaster Resilience Competition (NDRC) HUD defined a resilient community as one which “is able to resist and rapidly recover from disasters or other shocks with minimal outside assistance,” and that plan and implement disaster recovery that mitigates future threats “while also improving quality of life for existing residents and making communities more resilient to economic stresses or other shocks.” Improving the quality of life for existing residents and making them more resilient to other shocks, including economic stress that can push middle and working class families into poverty following a disaster, is at the core of our concern for equity in disaster recovery.

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

Also key to economic recovery and future resilience is ensuring that the jobs generated by recovery projects and programs are filled by local workers and those who lost jobs because of Harvey to create real jobs and job training for community residents, and create additional opportunities for community businesses. An economic development program that provides loans to small business will not be successful unless that business has access to a workforce. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge GCRPC to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage GCRPC and its subrecipients to do so.

Other options for increasing the number of jobs going to affected individuals and communities are ensuring that contractor qualifications include a commitment to local hiring and best value bidding processes that give more points to bidders who can comply with job quality and targeted hiring standards. CDBG-DR presents an opportunity to leverage housing and infrastructure funds into economic development funds as well.

**C. Needs Assessment and Funding Allocation**

We appreciate the great detail that GCRPC has included in their MOD methodology, including definitions of the various factors. However, because this methodology is based on incomplete FEMA data and the methodology provided by HUD and GLO, we are concerned that GCRPC will not be accurately addressing the critical housing and infrastructure needs of low and moderate income people in the area. The methodology provided by HUD and GLO for determining unmet housing needs underestimates the amount of loss to low-income populations. Using this methodology will not include the severity of damage suffered by low-income homeowners and distort the geographic allocation of money based on that standard.

Using FEMA Verified Loss (FVL) of real property (owners) to determine unmet need at the State level found that 54% of affected homeowners had no unmet needs on the basis that their FVL
was below the thresholds set for the FEMA damage categories. However, when this is broken down by income level, 69 percent of extremely low-income (ELI) owners were found to have no unmet needs. Conversely, only 41 percent of non-LMI owners were found to have no unmet needs. The conclusion, based on FEMA data, that families making less than 30% of Area Median Income (AMI), which, for example, is $12,060 in the Beaumont-Port Arthur MSA and $13,100 in the Corpus Christi MSA, have been better able to recover than families making more than double that amount is simply not credible. The inaccuracy of this calculation is borne out by a study conducted by the Episcopal Health Foundation and the Kaiser Family Foundation three months after Hurricane Harvey. The study found that lower-income families and Black and Latinx Texans were less likely to have homeowners’, renters’, or flood insurance, and that,

[n]early half (46%) say they or someone else in their household lost job-related income as a result of the storm, such as getting fewer hours at work (32%), losing a job entirely (12%) or losing income from a small business or unpaid missed days (32%). These income disruptions affected a greater share of Hispanic (65%) and Black (46%) residents compared to White residents (31%).

Lower- and even middle-income families are less likely to have the savings and access to credit that let them access safe housing (including more immediate repairs) and are more likely to be forced to relocate far from jobs and schools, to live in overcrowded housing or double up with family or friends, remain in unsafe housing, or become homeless.

The primary purpose of the CDBG program is to benefit LMI populations, yet the HUD methodology the State and therefore GCRPC are using has the clear, disproportionate effect on LMI populations of excluding them from the unmet needs assessment conclusions. This disproportionate effect is not only on low- and moderate-income Texans, but on Black and Latinx populations as well.

Using this methodology means that GCRPC is budgeting for unmet housing needs with the expectation that most LMI households, who fall into lower level damage categories if they are represented at all, are not severely damaged and will not need their homes rebuilt. While the average FVL for non-LMI homeowners was about twice that of ELI owners, the average income for non-LMI owners is over 14 times that of ELI owners. This methodology underrepresents LMI housing needs by income level, particularly misrepresenting the level of unmet rental housing need for ELI families. GCRPC’s use of HUD’s provided method for damage categories to weight the geographic distribution of CDBG-DR funds, therefore, will end up allocating resources away from areas that need them the most, affecting not only those families, but those communities as a whole.

Texas Appleseed supports the use of a data-based formula to allocate federal disaster recovery funds. But that formula must be adjusted to account for deficiencies in FEMA and other data and ensure that the needs of all Texans affected by Hurricane Harvey are taken into account. We strongly recommend that GCRPC use the methodology proposed by the Texas Low Income Housing Information Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household’s FVL to their income, thereby considering the
level of impact on a household, acknowledging the loss valuation variations produced by the FEMA/HUD methodology, and more accurately counts households with unmet housing needs that are the least able to recover and most vulnerable to housing insecurity. This method also ensures that the geographic allocation of funding addresses the actual levels of unmet housing needs in each locality.

In conclusion, we appreciate GCRPC’s work on the MOD methodology and disaster recovery in general, and we look forward to seeing your MOD. Please let us know if we can provide further information or be helpful in any way.

Brennan Griffin
Deputy Director
Texas Appleseed
bgriffin@texasappleseed.net
512-473-2800 ext. 102
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 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.

* Income Category | Income
---|---
Extremely Low Income (ELI) | 0-30% AMI
Very Low Income (VLI) | 30-50% AMI
Low Income (LI) | 50-80% AMI
Not Low or Median Income (Non-LMI) | 80%+ AMI
The stakes are high when assessing the unmet housing need of disaster survivors. In some areas of Texas, especially those that are home to many low-income families, being undercounted could mean being passed over for the funds necessary to bring people back to safe, affordable and comfortable homes. Below are the most severely undercounted zip codes in the state of Texas.

### Most Underfunded Renters

<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>$6,212,608</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>77340</td>
<td>Port Arthur</td>
<td>$5,866,615</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>78362</td>
<td>Rockport, Fulton, uninc. Aransas County</td>
<td>$5,665,630</td>
</tr>
<tr>
<td>9</td>
<td>77013</td>
<td>Houston - Northshore, El Dorado/Oates Prairie</td>
<td>$5,313,404</td>
</tr>
<tr>
<td>10</td>
<td>77028</td>
<td>Houston - Trinity, Kashmere Gardens, Settegast, East Houston</td>
<td>$5,129,894</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, Edgemoor, 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>$4,793,699</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>77016</td>
<td>Houston - East Little York/Homestead, Trinity/Houston Gardens</td>
<td>$4,052,771</td>
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<tr>
<td>16</td>
<td>78336</td>
<td>Aransas Pass, Ingleside, uninc. Aransas and San Patricio County</td>
<td>$3,862,106</td>
</tr>
<tr>
<td>17</td>
<td>77015</td>
<td>Houston - Northshore, Galena Park, uninc. Harris County</td>
<td>$3,568,755</td>
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<tr>
<td>18</td>
<td>77630</td>
<td>Orange, West Orange, Pinehurst, uninc. Orange County (south)</td>
<td>$3,455,848</td>
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<tr>
<td>19</td>
<td>77090</td>
<td>Houston - Greater Greenspoint, uninc. Harris County</td>
<td>$3,410,527</td>
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<tr>
<td>20</td>
<td>77075</td>
<td>Houston - Greater Hobby, South Belt/Ellington</td>
<td>$3,392,014</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>TOTAL</strong></td>
<td><strong>$111,520,079</strong></td>
</tr>
</tbody>
</table>

### Most Underfunded 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>$20,424,860</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, Edgemoor, Clear Lake</td>
<td>$16,511,824</td>
</tr>
<tr>
<td>10</td>
<td>77039</td>
<td>Houston - Greater Greenspoint</td>
<td>$15,487,093</td>
</tr>
<tr>
<td>11</td>
<td>77382</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>$14,549,859</td>
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<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>
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<tr>
<td>20</td>
<td>77084</td>
<td>Houston - Addicks Park Ten, uninc. Harris County</td>
<td>$10,408,647</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>TOTAL</strong></td>
<td><strong>$339,049,752</strong></td>
</tr>
</tbody>
</table>

*This is based not just on added LMI households, but also on already included households moving to a higher damage category.
June 27, 2018

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

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

Dear Mr. Ada,

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

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

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

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

Respectfully submitted,

John K. Kaminski
Assistant City Manager
July 9, 2018

Joe E. Brannan  
Golden Crescent Regional Planning Commission  
1908 N. Laurent, Suite 600  
Victoria, TX 77901  
Via email: jbrannan@gcrpc.org

In Re: GCRPC Method of Distribution for Community Development Block Grant – Disaster Recovery Program Disaster Recovery Allocation for Hurricane Harvey

Dear Mr. Brannan,

Below are comments on the Golden Crescent Regional Planning Commission’s (GCRPC) draft Method of Distribution (MOD) for Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

The majority of these comments focus on the buyout/acquisition program. However, the same comments apply to the infrastructure allocation methodology.

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

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

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

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1 Housers SAP comments, 7.  
2 HSAP coms 7.
conjectures as very little is publicly available as to what goes into an FVL determination.\(^3\)

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

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

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

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

GCRPC’s current method of allocation considers the total harm that each county experienced. Although this method attempts to equitably distribute funds by prioritizing those counties which experienced a greater amount of harm, the method does not give GCRPC the flexibility to determine the actual needs of the populations of each of these counties and whether buyout/acquisition programs will meet those needs.\(^8\) GCRPC’s allocation method would be more sensible and equitable if it were tasked with allocating funds for all housing programs. However, GCRPC only needs to allocate those funds intended for only the buyout and acquisition portion of the state housing programs. The allocation methodology should therefore be structured to identify which counties are most in need of buyout and acquisition funds.

Establishing program criteria for buyouts would enable GCRPC to identify areas in the counties

\(^3\) FEMA defines “verified loss” as “the total dollar amount of IHP-eligible real or personal property items of average quality, size, and capacity, as verified by FEMA”; an ambiguous and circuitous definition to say the least. IAPP-G, 67.
\(^4\) https://www.brookings.edu/blog/social-mobility-memos/2017/09/18/hurricanes-hit-the-poor-the-hardest/
\(^6\) HG 13.
\(^7\) Texas General Land Office, State Action Plan at 79.
\(^8\) GCRPC is required to allocate funds in a way that will satisfy “unmet needs.” SAP at 79
that qualify for the buyout program based on need, prioritize those in its buyout fund allocation, and estimate the cost of a buyout program. GCRPC can then use its limited funds to target the areas that stand to benefit the most from acquisition.

Buyout program eligibility criteria should focus on achieving two goals: meeting the GLO’s stated objectives of the buyout program, and meeting the national objective to support lower-income households. First, According to the GLO, buyouts serve to (1) provide resiliency over rebuilding in a floodplain; (2) prevent repetitive loss; and (3) end extreme risk to health and human safety.\footnote{SAP at 17.} GCRPC should establish criteria for buyouts that target these three objectives. For example, it could require that areas targeted for buyouts (1) be in a floodplain; (2) demonstrate housing damage due to Hurricane Harvey, as well as from prior recent floods; and (3) the flooding from Hurricane Harvey caused an extreme risk to health and human safety in that area from flood waters reaching several feet.

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

\section{The MOD should standardize the benefits provided in buyout programs}

According to the State Action Plan, subrecipients are required to develop guidelines, regulations, maximum assistance levels, target areas, and additional eligibility requirements for program.\footnote{SAP at 80.} The current MOD sets no standards for the benefits required in a buyout program. In its MOD, GCRPC should establish those program requirements that ensure individual households are provided with the assistance necessary to relocate to a comparable home, such as relocation assistance, down payment assistance, and relocation consultation services. These benefits should be available to all qualified persons, but can be denied to individuals who have already received similar assistance in order to avoid duplication of benefits.

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

\section{Conclusion}

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

I am available for questions by email at hdyal@trla.org and phone at (361) 880-5423. Thank you for your consideration of these comments.

Respectfully Submitted,

Hannah Dyal

Staff Attorney
Texas RioGrande Legal Aid
3825 Agnes St.
Corpus Christi, TX 78405
Michael,

Looking back through the State Action Plan (SAP) total Regional Allocation Budget for the GCRPC I noticed that we have the following listed:

    City of Victoria, Victoria County, VISD, NISD, VC, and VEC....

However I don’t see BISD, the water control districts, or the Port of Victoria, is there any explanation to this?

Thanks,

Rick McBrayer
Emergency Management Coordinator
Victoria Office of Emergency Management
205 N Bridge St B101
Victoria TX, 77901
361-580-5770 Office
361-580-5779 Fax
361-649-8366 Cell
rmcbrayer@victoriatxoem.org

Facebook: https://www.facebook.com/victoria.oem
Thanks that’s a perfect explanation.

On Jul 3, 2018, at 12:48 PM, "michaela@gcrpc.org" <michaela@gcrpc.org> wrote:

Hi Rick,

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

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

The Comptroller’s database only provides info on compliant entities.

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

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

Let me know if this answers your question.

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