



TEXAS GENERAL LAND OFFICE
COMMISSIONER DAWN BUCKINGHAM, M.D.

August 29, 2023

Diane Rath, Executive Director
Alamo Area Council of Governments
2700 N.E. Loop 410, Suite 101
San Antonio, TX 78217

Re: Alamo Area Council of Governments (AACOG) CDBG-MIT Regional Mitigation Program
Method of Distribution (MOD) Approval

Ms. Rath:

The Texas General Land Office (GLO) Community Development and Revitalization Division is approving the AACOG Mitigation Method of Distribution (MOD). The MOD delivered to the GLO was initially submitted March 30, 2023, underwent review by GLO staff, and was submitted a final time with corrections made on August 10, 2023.

With this approval, entities receiving funding from the MOD will receive information regarding the application process from the GLO. If you have any questions or require additional information, please contact Alex Swift at alex.swift.glo@recovery.texas.gov.

Sincerely,

Shawn Strange

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

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

Texas General Land Office

State of Texas CDBG-Mitigation Regional Mitigation Program
MIT COG MOD Summary



Delivered to the GLO:

Approved by the GLO:

Council of Governments: Alamo
Allocation Calculation Sheet Packet Page Number: 10

HUD MID and State MID Allocations

HUD MID Total	
State MID Total	\$29,888,000.00
Grand Total COG Allocation	\$29,888,000.00

Table 1

Funding Limits

<i>Minimum Amount</i> Waiver Requested	Yes X	No
Minimum Amount	\$900,000.00	
Maximum Amount		

Table 2

Regional Risk Mitigation

Explain how the method of distribution reduces regional risks, how it will foster long-term community resilience that is forward-looking and encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, and flooding in the HUD-identified and State-identified most impacted and distressed areas.

For the Method of Distribution (MOD), AACOG chose to allocate 50% of the total available funds to the seven (7) identified cities that are at 51% or higher low-to-moderate income (LMI) population (Group A communities). The Group A communities and residents are prioritized by various direct-service providers, including several other AACOG programs; however infrastructure improvements are relegated to local governments. Providing financial support to make much needed infrastructure improvements in high-risk areas is a priority for local governments, AACOG, the State, and HUD. Of the seven (7) identified cities, four (4) are communities within Hurricane Harvey impacted counties: Karnes City and Kenedy in Karnes County; and Marion and Seguin in Guadalupe County (also impacted by the 2015 floods). The other communities are within counties impacted by the 2015 floods: Charlotte in Atascosa County; and Dilley and Pearsall in Frio County.

The other 50% of the total funds were allocated to the nine (9) counties that were impacted by Hurricane Harvey and the 2015/2016 floods (Group B communities). Of the Hurricane Harvey impacted counties, only Karnes County was not impacted by the 2015 or 2016 floods; both Comal and Guadalupe Counties were impacted by the 2015 floods. Allocations were calculated using three weighted factors: LMI, SoVi, and total population. By separating allocations between Group A communities and Group B communities, we ensure every impacted county has the opportunity to invest in necessary projects – ideally projects that positively impact downstream communities. Additionally, Group B communities (counties) that have Group A

communities already receiving funding can use their allocation amounts to further support or enhance the Group A community project.

The MOD will reduce regional risk by targeting investment in areas impacted by Hurricane Harvey, 2015 Floods and 2016 Floods. Infrastructure improvements in the impacted areas will repair damage caused by the aforementioned weather events. In addition, flooding caused by future weather events should be reduced – with the goal being to eliminate flooding.

Determining which Distribution Factors to use in developing the AACOG MOD included discussions on resources available to the communities within the region. It was no surprise to find that urban communities tended to have more resources available to them including larger populations, property owners and businesses which contribute to the tax base. Smaller and rural communities do not have the larger numbers of these resources that urban communities do. With that in mind, staff turned to the Distribution Factors provided as options by the Texas GLO for COGs to select from and use in developing the MOD to assist the counties impacted by the 2015 and 2016 Floods, and Hurricane Harvey.

Use of the LMI Distribution Factor (source identified below in “Distribution Factors”) was included in determining the Alamo Region MOD based on the guidance provided in the Texas CDBG-MIT Regional Mitigation Program COG Method of Distribution Guidance document provided by the Texas GLO. In the document, 50% or more of the allocated funds must serve low- and moderate-income (LMI) populations. LMI was chosen as a distribution factor because high LMI communities largely represent historically underserved areas that have been identified by both HUD and the State as being the most distressed and suffer the most impact during natural disasters. In addition, LMI was considered a means to ensure that funds were allocated to distressed areas impacted by the 2015 and 2016 Floods, as well as Hurricane Harvey.

The waiver to include the counties impacted by the 2015 and 2016 floods was determined by the need for infrastructure improvements or repairs after repeated rain events damage streets, roads, and bridges while simultaneously deteriorating drainage adjacent to the damaged streets, roads and bridges in primarily rural areas. While several communities in the Alamo Region seek state and federal assistance to do infrastructure projects, they do not always possess the capability to provide a financial and/or in-kind match for grants. As indicated earlier, urban communities tend to have more resources to respond to weather disaster events. Providing an opportunity for the rural communities to have access to other sources of funding for projects is one way to help mitigate disasters and better plan for future events.

Table 3

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
LMI	50%	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important for historically underserved areas and populations to receive services.
Population	25%	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important for historically underserved areas and populations to receive services.

SoVI	25%	CDBG-MIT AP Analysis; Provided by TxGLO	Important that historically underserved areas and populations receive services.

Table 4

*Add more rows if needed

Threshold Factors

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

Threshold Factor*	Documentation Source	Explanation of Factor Selection
LMI to identify eligible communities with LMI percentage at 51% or higher	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important to ensure 50% of allocation goes to those eligible communities with a minimum of 51% LMI, and to better serve communities with high LMI percentages

Table 5

*Add more rows if needed

Eligible Activities

Activities must meet the criteria outlined in the Regional Mitigation Program (COG MODs) section of the State of Texas CDBG Mitigation Action Plan.

The COG has addressed prioritization of eligible activities as follows:

X	The COG has chosen not to limit subrecipients in the region to projects meeting regional priority activities.		
-OR-			
<input type="checkbox"/>	The COG has limited subrecipients in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Flood control and drainage improvement, including the construction or rehabilitation of stormwater management systems	<input type="checkbox"/>	Water and sewer facilities
<input type="checkbox"/>	Natural or green infrastructure	<input type="checkbox"/>	Communications infrastructure
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/>	Provision of generators
<input type="checkbox"/>	Economic development (assistance to businesses for the installation of disaster	<input type="checkbox"/>	Removal of debris
		<input type="checkbox"/>	Streets or bridges
		<input type="checkbox"/>	Other infrastructure improvements
		<input type="checkbox"/>	Public Services (<i>within the 15% cap</i>)

mitigation improvements and technologies; financing to support the development of technologies, systems and other measures to mitigate future disaster impacts; “hardening” of commercial areas and facilities; and financing critical infrastructure sectors to allow continued commercial operations during and after disasters)	<input type="checkbox"/>	FEMA Hazard Mitigation Grant Program (HMGP) cost share for CDBG-MIT eligible project
	<input type="checkbox"/>	Buyouts or Acquisitions with or without relocation assistance, down payment assistance, housing incentives, or demolition
	<input type="checkbox"/>	Activities designed to relocate families outside of floodplains

Table 6

Ineligible Activities

Ineligible activities are outlined in the Regional Mitigation Program section of the State of Texas CDBG Mitigation Action Plan, as amended, and should be referenced accordingly.

Covered Projects

A Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds, regardless of source (CDBG-DR, CDBG-MIT, or CDBG). Covered projects included in the Regional Mitigation Program must meet specific criteria set forth by HUD’s CDBG-MIT Notice 84 FR 45838 (August 30, 2019) and the State of Texas Mitigation Action Plan. Inclusion of a Covered Project in the MOD does not guarantee funding until a full eligibility review is completed and the subsequent action plan amendment receives HUD approval.

Will the Method of Distribution include a Covered Project?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Table 7

If yes, please provide the following information:

- The eligible entity benefitting from the project;
- A description of the project and how it meets the definition of a mitigation activity; and
- The cost of the Covered Project.

Not Applicable

Table 8

Low-and Moderate-Income Requirements

Below is the strategic plan of how the method of distribution meets the minimum 50 percent low- and moderate-income (LMI) requirement.

<p>Using the Excel workbooks provided to AACOG by the Texas General Land Office (GLO), the 50% low-and moderate-income (LMI) threshold information was given at the March 16 Public Planning Meeting. Additionally, the information will provided at the Public Hearing, as well as during all one-on-one meetings with eligible entities.</p> <p>\$14,944,000 of the \$29,888,000 allocation must benefit LMI areas, and are allocated accordingly based on the provided city LMI. 100% of the funds allocated to cities over 51% LMI must be spent on projects benefitting populations that meet the HUD LMI national objective.</p> <p>The LMI requirement will help allocate funds to rural areas impacted by the 2015 and 2016 Floods, and Hurricane Harvey.</p>

Table 9

Public Hearing Information

The Action Plan requires at least one Public Planning Meeting prior to submitting the Preliminary MOD to the GLO for review and one Public Hearing before submission of the Preliminary MOD to GLO for final approval. If the COG holds multiple outreach activities, please contact the GLO for additional documentation forms.

Meeting Type	Public Planning Meeting	MOD Public Hearing
Date(s):	March 16, 2022	July 17, 2023
Location(s):	2700 NE Loop 410, San Antonio, TX	2700 NE Loop 410, San Antonio, Texas 78217
Total Attendance:	2	4 (Not including 2 staff)

Table 10

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

Method		Public Planning Meeting	MOD Public Hearing
		Date(s) Sent	Date(s) Sent
<input checked="" type="checkbox"/>	Email	March 9, March 16, 2022	July 11, July 17, 2023
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

Table 11

Website Notice. As required, public notice was posted on the COG website at least **five (5)** days in advance:

Website Notice	Public Planning Meeting	MOD Public Hearing
Date(s)	March 9, 2022	July 3, 2023

Table 12

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 the public hearings were published in the following regional newspaper(s):

Newspaper Name	Public Planning Meeting	MOD Public Hearing
	Date Published	Date Published
Seguin Gazette	March 9, 2022	July 5, 2023
Wilson County News	March 9, 2022	July 5, 2023
Karnes Countywide	March 10, 2022	See documentation
Hondo Anvil	March 10, 2022	
Frio-Nueces Current	March 10, 2022	July 6, 2023
Boerne Star	March 8, 2022	July 9, 2023
Bandera Bulletin	March 9, 2022	July 5, 2023
Pleasanton Express	March 9, 2022	July 5, 2023
San Antonio Express-News	March 9, 2022	
New Braunfels Herald-Zeitung		July 9, 2023

Table 13

Public Comment Period

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

Start Date:	July 3, 2023	End Date:	July 20, 2023	No. of Days:	17
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Table 14

NOTE: Public Comment Period for this COG MOD was held during the planning phase of the MOD development – March 16, 2022 through April 1, 2022, or 16 days.

Citizen Participation

Describe how the COG conducted their citizen and non-governmental organization outreach, including any efforts exceeding GLO minimum public participation requirements. These efforts should comply with the Citizen Participation Plan provided to the GLO.

AACOG held a public planning meeting after normal business hours, and used several mediums of communication to promote this event. Outreach efforts included email newsletters, newspaper advertisements, and targeted social media posts and advertisements being pushed to residents of the zip codes that make up the eligible counties. Public Meeting details were sent out via Constant Contact software to the AACOG member government list (city and county elected officials and staff), the Comprehensive Economic Development Strategy (CEDS) committee, economic development contacts, and area housing authorities within those 9 counties.

Additionally, the meeting was offered virtually for attendees who could not attend in person. This opportunity to tune in live from your home or work was prominently advertised on the AACOG website and print/digital promotions. The public meeting was also recorded and uploaded onto our website, along with information to review the PowerPoint presentation – which was also made available on the AACOG website – and submit public comments before the April 1 deadline.

On June 2, AACOG held a virtual meeting with the housing authorities from the region. These authorities were listed in the Citizen Participation Plan.

Table 15

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

The details for the MOD, its development process, and public meeting access was produced in English and Spanish. Necessary and appropriate accommodations were made available at public meetings for residents needing assistance, and were promoted on all print and digital promotions of the public meeting.

Table 16

Affirmatively Furthering Fair Housing (AFFH) 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.

COG Principal Contact Information

Contact Name:	Claudia Mora
Title:	Regional Services Administrator

Table 17

Contact and Signatory Authority

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

Diane Rath
Signature

7/27/23
Date

Diane Rath
Printed Name

Executive Director
Title

drath@aacog.com
Email Address

210-362-5201
Telephone Number

COG: **ALAMO**
 Total Allocation: \$ **29,888,000.00**

State MID - Group A				
Entity	Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage
Charlotte	\$ 2,134,900.00	14.29%	\$ 2,134,900.00	100.00%
Karnes City	\$ 2,134,900.00	14.29%	\$ 2,134,900.00	100.00%
Pearsall	\$ 2,134,900.00	14.29%	\$ 2,134,900.00	100.00%
Dilley	\$ 2,134,900.00	14.29%	\$ 2,134,900.00	100.00%
Seguin	\$ 2,134,800.00	14.29%	\$ 2,134,800.00	100.00%
Kenedy	\$ 2,134,800.00	14.29%	\$ 2,134,800.00	100.00%
Marion	\$ 2,134,800.00	14.29%	\$ 2,134,800.00	100.00%
Total	\$ 14,944,000.00	100.00%	\$ 14,944,000.00	100.00%
State MID - Group B				
Entity	Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage
Atascosa	\$ 1,505,200.00	10.07%	\$ -	0.00%
Bandera	\$ 1,317,100.00	8.81%	\$ -	0.00%
Comal	\$ 1,733,100.00	11.60%	\$ -	0.00%
Frio	\$ 2,184,200.00	14.62%	\$ -	0.00%
Gillespie	\$ 1,395,600.00	9.34%	\$ -	0.00%
Guadalupe	\$ 1,850,700.00	12.38%	\$ -	0.00%
Karnes	\$ 2,197,900.00	14.71%	\$ -	0.00%
Kendall	\$ 1,472,800.00	9.86%	\$ -	0.00%
Wilson	\$ 1,287,400.00	8.61%	\$ -	0.00%
Total	\$ 14,944,000.00	100.00%	\$ -	0.00%
REGIONAL LMI ALLOCATION				50.00%

Summary Sheet Allocation has been rounded.

- Falls City*
- Jourdanton*
- Pleasanton*
- Poteet*
- La Vernia*
- Poth*
- Stockdale*
- Bandera*
- Lytle*
- New Braunfels*

*City does not have an LMI percentage of 50% or higher, and will not receive funding

COG: **ALAMO**

Total Allocation: \$ **29,888,000.00**

HUD MID Allocation:

State MID Allocation: \$ **29,888,000.00**

Group B

City or County	First Distribution Factor: LMI				Second Distribution Factor: Population				Third Distribution Factor: SoVI				Entity Weighted Factor Total (EWFtot)	Weighted Factor Total (WFtot)	Proportional Weighted Factor (PWF) EWFtot/WFtot	Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD	50% of \$29,888,000 for LMI
	Maximum Factor Measure: 50.25%				Maximum Factor: 158,966				Maximum Factor: 5									
	Factor Weight: 50				Factor Weight: 25				Factor Weight: 25									
	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)						
Atascosa	37.79%	50.25%	50	37.60	49,528	158,966	25	7.78908697	1	5	25	5.00	50.39	500.31	10.07%	\$ 14,944,000.00	\$ 1,505,159.03	
Bandera	35.78%	50.25%	50	35.60	22,215	158,966	25	3.49	1	5	25	5.00	44.10	500.31	8.81%	\$ 14,944,000.00	\$ 1,317,117.78	
Comal	30.90%	50.25%	50	30.75	141,642	158,966	25	22.28	1	5	25	5.00	58.02	500.31	11.60%	\$ 14,944,000.00	\$ 1,733,084.93	
Frio	50.25%	50.25%	50	50.00	19,871	158,966	25	3.13	4	5	25	20.00	73.13	500.31	14.62%	\$ 14,944,000.00	\$ 2,184,212.36	
Gillespie	37.75%	50.25%	50	37.56	26,459	158,966	25	4.16	1	5	25	5.00	46.72	500.31	9.34%	\$ 14,944,000.00	\$ 1,395,604.14	
Guadalupe	32.12%	50.25%	50	31.96	158,966	158,966	25	25.00	1	5	25	5.00	61.96	500.31	12.38%	\$ 14,944,000.00	\$ 1,850,723.56	
Karnes	46.37%	50.25%	50	46.14	15,545	158,966	25	2.44	5	5	25	25.00	73.58	500.31	14.71%	\$ 14,944,000.00	\$ 2,197,921.57	
Kendall	37.61%	50.25%	50	37.42	43,769	158,966	25	6.88	1	5	25	5.00	49.31	500.31	9.86%	\$ 14,944,000.00	\$ 1,472,756.50	
Wilson	30.52%	50.25%	50	30.37	49,173	158,966	25	7.73	1	5	25	5.00	43.10	500.31	8.61%	\$ 14,944,000.00	\$ 1,287,420.12	
													500.31		100%		\$ 14,944,000.00	\$ -



**Alamo Area Council of Governments
Public Hearing
Texas CDBG-MIT Regional Mitigation Program
Method of Distribution Development (MOD)
Monday, July 17, 2023
5:00 p.m.**

AGENDA

Welcome and Introductions

Overview of Regional Method of Distribution Process

Receive Public Comments

Adjourn

**AACOG CDBG-MIT MOD
Public Hearing
July 17, 2023, 5:30 p.m.
AACOG Board Room
2700 N E Loop 410
San Antonio, Texas 78217**

Minutes

The public hearing on the AACOG CDBG-Mitigation Method of Distribution (CDBG-MIT MOD) began at 5:00 P.M. The public hearing was held in the board room at the Alamo Area Council of Governments (AACOG). There were 4 attendees (non-AACOG staff) and 2 AACOG staff present in the board room.

Claudia Mora, Regional Services Administrator, opened the public hearing.

Ms. Mora gave a PowerPoint presentation on the CDBG-MIT MOD development process. The presentation cited the reason for a second round of MOD postings and public hearing. The incorrect allocation calculations for the counties eligible for funds were posted and presented at the November 2022 public hearing, and letters to the counties contained the incorrect figures. The allocation calculation for each of the 9 eligible counties was fixed and new letters with the correct allocations were issued. The allocations to the 7 eligible cities were not impacted; therefore, no changes were made to those figures.

Comments from attendees began with Kathy Wood, representing the City of Seguin. She stated that she opposes the methodology used to distribute the funds to cities. Ms. Wood mentioned that a number of Seguin residents attended the November public hearing and were also opposed to equally distributing the funds among the cities. She felt that population should be used in the MOD so that Seguin received a more equitable allocation. Ms. Wood also mentioned that smaller communities may not have the staffing or resources to administer the grant.

Donna Dodge, Mayor of Seguin, stated that the City of Seguin City Council passed a resolution opposing the methodology used to allocate funds to eligible cities. She questioned why not use the same distribution factors that were used to allocate funds to the counties for the allocation to cities. Mayor Dodge indicated that using the distribution factors would distribute funds equitably.

The third comment was submitted in writing.

Miguel Segura, Director of Public Affairs and Regional Development, told the public hearing attendees that responses to comments and questions would be posted on the AACOG website in the next day or two.

With no one else commenting, Ms. Mora reminded the attendees that the deadline to submit comments was 5:00 p.m. on July 20. In addition, she mentioned that various AACOG CDBG-MIT MOD documents were located at aacog.com/regional-services.

Ms. Mora thanked everyone for attending and closed the public hearing at 5:18 p.m.



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on July 19, 2023.

The City of Seguin ~~thinks~~ feels the fairest method of distribution would be to allocate the available funds based on percentage of population.

If more room needed, use back of page

Name:	Steve Parker
Organization/Business (if applicable):	City of Seguin City Manager
Phone #:	210 2736266
Email:	sparker@seguintexas.gov

**AACOG CDBG-MIT MOD
PUBLIC COMMENTS AND QUESTIONS**

QUESTION(S):

1. Kathy Wood, City of Seguin – What path of recourse do entities have regarding the allocation amounts? What happens to allocations not spent by entities within the region?

Response: Communities who have projects in mind that are anticipating the need for additional Mitigation (MIT) Method of Distribution (MOD) funding are encouraged to contact their County Commissioners Court to inform them of the project, and potentially enter into an Interlocal Agreement (ILA) between the city and county to aide with their project. Any unspent funds will be reallocated to other State of Texas programs and will not be scheduled for a reallocation under this program.

Additionally, the MOD is currently out for public comment and stakeholders are encouraged to provide comments online, via email to cmora@aacog.com or at the public hearing on July 17 at 5 p.m.. The public comment period will be open through July 20, 2023 at 5:00PM.

PUBLIC HEARING COMMENTS:

1. Kathy Wood, City of Seguin – Ms. Wood opposes Method of Distribution (MOD) for the eligible cities. Ms. Wood believes the MOD should be based on population. She mentioned Seguin community representatives attended the first public hearing and voiced their concerns over the methodology used, which divides the total funds equally among the seven (7) eligible cities. Ms. Wood expressed concern for some smaller, eligible entities who may not have the resources to administer the funds and end up having to return the funds to the TxGLO, and thus, have the funds leave the region and not be available to communities like Seguin. Ms. Wood also stated she felt that the methodology used to distribute funds among the nine (9) counties – using the factors of Low-to-Moderate Income (LMI), Societal Vulnerability Index (SoVI), and Population – was fair and equitable for the allocation of funds. (*Verbal Comments*)
 - a. **Response:** AACOG believes a formula-based calculation of funding for eligible counties is necessary to ensure counties have an appropriate amount of dollars available to meet the needs of the cities and overall population within their respective county. AACOG also believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. Providing historically underserved communities the access to increased public funding, specifically for the purposes of building infrastructure to alleviate the adverse effects on people and property during natural disasters, can be transformational for these communities and their residents. Letters were sent out to all the communities’

mayors and city councils to inquire about their need and use of the preliminary-approved allocation amounts. All seven cities approved and signed the commitment to use the funds if funding was indeed allocated to them.

2. Donna Dodgen, Mayor, City of Seguin – Mayor Dodgen stated the City of Seguin City Council passed a resolution opposing the MOD that allocated funds evenly to the seven (7) eligible cities, to formally express their opposition to the proposed MOD allocations. Mayor Dodgen stated that the methodology used to determine the allocations for the counties was equitable and should have been used for the cities. (*Verbal Comment*)
 - a. **Response:** AACOG sincerely appreciates the engagement and involvement from the City of Seguin on this program and process. The factors, separation, and distribution of amounts allocated to eligible cities and counties was performed strategically, and after much consideration. If cities have a project in mind for their allocations and anticipate needing supplementary dollars to complete it, AACOG strongly encourages cities contact their County Commissioners Court to inform them of the project and request to enter into an Interlocal Agreement (ILA) between the city and county to aide with the project(s).

3. Steve Parker, City Manager, City of Seguin – Mr. Parker stated the fairest method of distribution would be to allocate the available funds based on the percentage of population. (*Written Comment*)
 - a. **Response:** AACOG believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. AACOG does agree that population is a considerable factor, which is why ‘Population’ was used on the county allocations. By doing this, eligible cities - regardless of population – have the opportunity to take on significant projects that can truly alleviate the adverse effects on people and property during natural disasters; and cities and counties with higher populations can come together through an Interlocal Agreement (ILA) to supplement funds for any one project beneficial to the residents of said city.

No questions were asked during the Public Hearing.

**AACOG CDBG-MIT MOD
PUBLIC COMMENTS AND QUESTIONS**

QUESTION(S):

1. Kathy Wood, City of Seguin – What path of recourse do entities have regarding the allocation amounts? What happens to allocations not spent by entities within the region?

Response: Communities who have projects in mind that are anticipating the need for additional Mitigation (MIT) Method of Distribution (MOD) funding are encouraged to contact their County Commissioners Court to inform them of the project, and potentially enter into an Interlocal Agreement (ILA) between the city and county to aide with their project. Any unspent funds will be reallocated to other State of Texas programs and will not be scheduled for a reallocation under this program.

Additionally, the MOD is currently out for public comment and stakeholders are encouraged to provide comments online, via email to cmora@aacog.com or at the public hearing on July 17 at 5 p.m.. The public comment period will be open through July 20, 2023 at 5:00PM.

PUBLIC HEARING COMMENTS:

1. Kathy Wood, City of Seguin – Ms. Wood opposes Method of Distribution (MOD) for the eligible cities. Ms. Wood believes the MOD should be based on population. She mentioned Seguin community representatives attended the first public hearing and voiced their concerns over the methodology used, which divides the total funds equally among the seven (7) eligible cities. Ms. Wood expressed concern for some smaller, eligible entities who may not have the resources to administer the funds and end up having to return the funds to the TxGLO, and thus, have the funds leave the region and not be available to communities like Seguin. Ms. Wood also stated she felt that the methodology used to distribute funds among the nine (9) counties – using the factors of Low-to-Moderate Income (LMI), Societal Vulnerability Index (SoVI), and Population – was fair and equitable for the allocation of funds. (*Verbal Comments*)
 - a. **Response:** AACOG believes a formula-based calculation of funding for eligible counties is necessary to ensure counties have an appropriate amount of dollars available to meet the needs of the cities and overall population within their respective county. AACOG also believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. Providing historically underserved communities the access to increased public funding, specifically for the purposes of building infrastructure to alleviate the adverse effects on people and property during natural disasters, can be transformational for these communities and their residents. Letters were sent out to all the communities’

mayors and city councils to inquire about their need and use of the preliminary-approved allocation amounts. All seven cities approved and signed the commitment to use the funds if funding was indeed allocated to them.

2. Donna Dodgen, Mayor, City of Seguin – Mayor Dodgen stated the City of Seguin City Council passed a resolution opposing the MOD that allocated funds evenly to the seven (7) eligible cities, to formally express their opposition to the proposed MOD allocations. Mayor Dodgen stated that the methodology used to determine the allocations for the counties was equitable and should have been used for the cities. (*Verbal Comment*)
 - a. **Response:** AACOG sincerely appreciates the engagement and involvement from the City of Seguin on this program and process. The factors, separation, and distribution of amounts allocated to eligible cities and counties was performed strategically, and after much consideration. If cities have a project in mind for their allocations and anticipate needing supplementary dollars to complete it, AACOG strongly encourages cities contact their County Commissioners Court to inform them of the project and request to enter into an Interlocal Agreement (ILA) between the city and county to aide with the project(s).

3. Steve Parker, City Manager, City of Seguin – Mr. Parker stated the fairest method of distribution would be to allocate the available funds based on the percentage of population. (*Written Comment*)
 - a. **Response:** AACOG believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. AACOG does agree that population is a considerable factor, which is why ‘Population’ was used on the county allocations. By doing this, eligible cities - regardless of population – have the opportunity to take on significant projects that can truly alleviate the adverse effects on people and property during natural disasters; and cities and counties with higher populations can come together through an Interlocal Agreement (ILA) to supplement funds for any one project beneficial to the residents of said city.

No questions were asked during the Public Hearing.

NOTATION OF CORRECTED DEFICIENCIES
(as cited in letter of May 24, 2023)

1. Allocation Calculation for Group B – The corrected allocation calculation worksheet was used.
 - a. The correct allocation figures were populated into the Allocation Summary.
 - b. The correct allocation figures were rounded to the nearest \$100.
 - c. The correct allocation figures were posted July 7, 2023 on the ACOG website along with inclusion in the PowerPoint presentation for the July 17, 2023 public hearing.
2. Funding Acknowledgement Letters to Group B Entities.
 - a. Funding letters with the correct allocation figures rounded to the nearest \$100 were re-issued to the Group B entities.
 - b. All Group B entities acknowledged and accepted the funding.
 - c. Copies of the signed acknowledgement and acceptance form are part of the Final MOD package.
3. Public Comment Period Notification Procedure
 - a. Email notification regarding the revised MOD and public hearing was sent to all eligible entities and interested parties on July 11, 2023.
 - b. A reminder was sent on July 17, 2023.
 - c. Comment period was July 3 through July 20, 2023.
 - d. The MOD was posted on the ACOG website on July 3, 2023, along with information on making comments and a comment form.
 - e. Publication of the public hearing and comment period took place July 5, 6 and 9 in newspapers within the 9 eligible counties. The eligible communities are within the eligible counties. Copies of publisher affidavits and tear sheets are part of the MOD package.
 - f. ACOG purchased ads on Facebook for the MOD and public hearing. The ads targeted the zip codes of eligible communities and counties. Copies are part of the MOD package.
4. ACOG Board of Directors Approval of Corrected MOD
 - a. The revised MOD was presented to the ACOG Board of Directors on July 26, 2023.
 - b. The board of directors approved the revised MOD.
 - c. A copy of the ACOG Board of Directors agenda for July 26, 2023 is provided in the MOD package.



TEXAS GENERAL LAND OFFICE
COMMISSIONER DAWN BUCKINGHAM, M.D.

May 24, 2023

Diane Rath
Executive Director
Alamo Area Council of Governments
2700 N.E. Loop 410, Suite 101
San Antonio, TX 78217

Re: Alamo Area Council of Governments (AACOG) Mitigation MOD Final Review

Ms. Rath:

The Texas General Land Office (GLO) Community Development and Revitalization division has reviewed the AACOG mitigation Method of Distribution (MOD) delivered to the GLO that was most recently submitted with updated information on April 26, 2023. The GLO is unable to approve the MOD at this time due to the following deficiencies:

- Based on the documentation provided, AACOG did not follow the MOD Public Hearing and public comment period notification procedure described in its citizen participation plan that was approved on February 14, 2022. As outlined in the MOD contract, notices must “Be delivered directly to stakeholders and all eligible entities within Subrecipient’s region.” The public outreach documentation provided indicates that notification was:
 - Not sent to all eligible entities in the region, or to the stakeholders outlined in the citizen participation plan.
 - Not published in newspapers at least three days in advance.
 - Posted on the COG website the day after the MOD Public Hearing, not at least five days in advance as required.
- The formula used to calculate the allocation for “Group B” in the submitted final MOD used a methodology containing calculation errors that were corrected by AACOG in the October 13, 2022 preliminary MOD submission. This resulted in the final allocations for each entity in the group to be incorrect in the Final MOD submission. Upon review of the COG website, the correctly calculated allocations were posted as the “AACOG Calculation Allocation Worksheet”, but a different incorrect set of allocations were used in the PowerPoint presentation for the MOD Public Hearing.

- The funding acknowledgement letters did not have the correct allocations. The allocations used in the funding acknowledgement letters to “Group B” entities reflect the totals from the incorrectly calculated allocations and are not rounded to the nearest \$100, as required in section 3.3.vi(d) of the guidance document.

In order to obtain final MOD approval, please:

1. Utilize the correct calculations used for the allocations in the approved preliminary MOD for “Group B”.
2. Send funding acknowledgement letters with the corrected allocations rounded to the nearest \$100 for all “Group B” entities.
3. Follow the notification process outlined in the approved citizen participation plan and hold an additional 15-day public comment period and MOD Public hearing.
4. Obtain AACOG board of directors’ approval for the corrected MOD.

If you have any questions or require any additional information, please contact Alex Swift at alex.swift.glo@recovery.texas.gov

Sincerely,

Alexandra Gamble

Alexandra Gamble, Policy Development Director
Community Development and Revitalization

cc: Heather Lagrone, Community Development and Revitalization Senior Deputy Director

Shawn Strange, Community Development and Revitalization Policy Development Manager

**A RESOLUTION TO APPROVE THE METHOD OF DISTRIBUTION FOR THE
ALLOCATION OF COMMUNITY DEVELOPMENT BLOCK GRANT MITIGATION (CDBG-MIT)
REGIONAL MITIGATION PROGRAM**

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

WHEREAS, on March 18, 2022, the U.S. Department of Housing and Urban Development (HUD) approved the State of Texas Community Development Block Grant-Mitigation (CDBG-MIT) Action Plan Amendment 1, developed and administered by the Texas General Land Office (GLO);

WHEREAS, the Texas CDBG-MIT Action Plan Amendment 1 increased the allocation to the Alamo Area from \$12.8M to \$29.8M in CDBG-MIT Regional Program funds;

WHEREAS, at the April AACOG Board of Directors meeting, the board ratified the development of a Method of Distribution (MOD) for the Texas CDBG-MIT Regional Mitigation Program to address hazard mitigation needs;

WHEREAS, the AACOG Board of Directors also ratified two (2) waiver requests to include in the MOD the counties impacted by the 2015 and 2016 floods, and to lower the minimum funding limit for projects to \$900,000;

WHEREAS, AACOG held a public planning meeting on March 16, and public hearings on November 9 and July 17, and used comments to establish the AACOG CDBG-MIT Regional Program assistance to eligible local governments within the Alamo Area;

WHEREAS, the AACOG CDBG-MIT MOD allocates 50% or \$14.9M to seven (7) communities with Low-to-Moderate (LMI) percentages of 51% and higher (Charlotte, Karnes City, Pearsall, Dilley, Seguin, Kenedy, Marion); and

WHEREAS, 50% or \$14.9M is allocated to nine (9) eligible counties (Atascosa, Bandera, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall and Wilson) using the Distribution Factors of LMI, Societal Vulnerability Index; and Population to determine allocation amounts.

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

1. That the Alamo Area Council of Governments accepts and approves the AACOG CDBG-MIT Regional Mitigation Program MOD.
2. That the Alamo Area Council of Governments reviewed and accepts into the MOD, comments made during the public meetings and public comment period.
3. That this Resolution shall become effective immediately upon adoption.

Passed and approved this 26th day of July, 2023.



James Teal, Chairman
AACOG Board of Directors and
Judge, McMullen County



Diane Rath, Executive Director
AACOG

**A RESOLUTION TO APPROVE THE METHOD OF DISTRIBUTION FOR THE
ALLOCATION OF COMMUNITY DEVELOPMENT BLOCK GRANT MITIGATION (CDBG-MIT)
REGIONAL MITIGATION PROGRAM**

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

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WHEREAS, the AACOG CDBG-MIT MOD allocates 50% or \$14.9M to seven (7) communities with Low-to-Moderate (LMI) percentages of 51% and higher (Charlotte, Karnes City, Pearsall, Dilley, Seguin, Kenedy, Marion); and

WHEREAS, 50% or \$14.9M is allocated to nine (9) eligible counties (Atascosa, Bandera, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall and Wilson) using the Distribution Factors of LMI, Societal Vulnerability Index; and Population to determine allocation amounts.

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

1. That the Alamo Area Council of Governments accepts and approves the AACOG CDBG-MIT Regional Mitigation Program MOD.
2. That the Alamo Area Council of Governments reviewed and accepts into the MOD, comments made during the public meetings and public comment period.
3. That this Resolution shall become effective immediately upon adoption.

Passed and approved this 25th day of January, 2023.


James Teal, Chairman
AACOG Board of Directors and
Judge, McMullen County


Diane Rath, Executive Director
AACOG

**AACOG
CDBG-MIT MOD
FUNDING ACKNOWLEDGMENT SUMMARY**

ENTITY	ACCEPT	DECLINE	DESIGNATED OFFICIAL
City of Charlotte	X		Stephen Porter
City of Dilley	X		Gilbert Equia
City of Karnes City	X		Leroy Skloss
City of Kenedy	X		Brandon Briones
City of Marion	X		Victor Contreras
City of Pearsall	X		Fred Reyes
City of Seguin	X		Steve Parker
Atascosa County	X		Weldon Cude
Bandera County	X		Richard Evans
Comal County	X		Sherman Krause
Frio County	X		Rochelle Camacho
Gillespie County	X		Daniel Jones
Guadalupe County	X		Kyle Kutscher
Karnes County	X		Wade Hedtke
Kendall County	X		Shane Stolarczyk
Wilson County	X		Henry Whitman



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may leave the completed form with AACOG staff or mail to AACOG Public Affairs - CDBG-MIT Comments, 2700 NE Loop 410, Suite 101 San Antonio, TX 78217 by November 21st, 2022.

I am representing the City of Seguin at today's public meeting. The City of Seguin was impacted by the 2015 floods and Hurricane Harvey. We have an LMI of 53.76% and a growing population of 30,902 residents. The Method of Allocation being proposed by AACOG for the seven impacted cities, identified as Group A, is simply dividing the proposed allocation by seven. AACOG is proposing an allocation of \$2,134,857.14 for each of the seven cities listed in Group A. This does not take into account population. The methodology used for the Group B, counties, uses population as a factor in determining funding allocations. The methodology used by AACOG is not consistent for Group A and Group B.

The City of Seguin is the largest city listed in Group A. In fact, we are 300% bigger than the next largest city of 7,637 residents. We believe that our size and overall greater proportion of LMI residents warrants an allocation method that reflects our community.

We are proposing that AACOG use the total amount of \$14,943,999.98 and divide this number by the total population of all seven cities. \$14.9M divided by a total population of 51,793 is \$288.53 per person. The amount per person should be multiplied by each city's population. Any City less than the \$900,000 floor should be brought up to \$900,000. Under this method, Seguin would accurately reflect 30,902 residents x \$288.53 or roughly \$8.9M. We are proposing that the difference between the floor amount and the actual calculation for any less than \$900,000 be subtracted from the amount that will be allocated to Seguin with the final allocation for our city closer to \$7.6M ^{city}

It is only fair that all communities receive funding that reflects their population and needs.

Kathy Wood	Kathy J. Wood
City of Seguin	
11/9/22	

AACOG CDBG-MIT MOD
Public Hearing
November 9, 2022, 5:30 p.m.
City of Marion City Hall

Minutes

The public hearing on the AACOG CDBG-Mitigation Method of Distribution (CDBG-MIT MOD) began at 5:32 P.M. The public hearing was held in the City Council Chambers at the City of Marion City Hall in Guadalupe County. There were nine (9) non-AACOG staff present in the chambers, 15 non-AACOG staff online, and Alex Swift from GLO present via GoToMeeting.

Claudia Mora, Regional Services Administrator, opened the public hearing.

Comments from attendees began with Kathy Wood, representing the City of Seguin. Ms. Wood indicated that Seguin was affected by the 2015 floods as well as Hurricane Harvey. She spoke on the methodology used to develop the MOD. Ms. Wood indicated that the methodology used for the cities and counties allocated funds was not consistent. She recommended that distribution factors be used for the cities as they were used for the counties. She felt that population should be used in the MOD so that Seguin received a more equitable allocation. The current MOD allocated 30% per capita less than the other cities.

Mayor Victor Contreras from the City of Marion spoke on how smaller cities usually ended up with the burden of paying more for infrastructure projects. He spoke in favor of the AACOG CDBG-MIT MOD because it evenly allocated funds to cities with over 51% Low to Moderate Income (LMI).

Jayce Robbins with the Meadow Lake WCID spoke in favor of increasing the allocation for Seguin. He talked about LMI being an important factor for distribution; and that when paired with population, the MOD would have a greater impact per capita for the cities. Increased funding would help in the repair of flood gates for the river that goes through Seguin. Mr. Robbins also expressed that he did not understand why LMI is evenly split among the cities and why a population factor was not included in the MOD for the cities' allocations. He felt that LMI per capita was a better distribution.

Whitney Beschoff spoke about the park and river in Seguin being a popular destination for residents and tourists. She was in support of Seguin receiving a larger allocation.

Jenny Margrave indicated she would send in her comments. She also stated that she was in support of Seguin receiving a larger allocation.

Mark McCoy indicated he would send in his comments. He also stated that he was in support of Seguin receiving a larger allocation.

Lynn Campaigne stated she would submit her comments.

Jill Stechschulte stated that tourism was a huge factor for more funds allocated to maintain what is needed to preserve and repair the river and dam. She indicated she would submit her comments.

Sydney Burton spoke on preserving and fixing the gates at Nolte Dam so that tragedies would be prevented. She supported increased funds to Seguin.

Roxanne Hendrickson indicated she did not have comments.

Jaycee Robbins clarified that his reason for supporting increased funding to Seguin was because the State did not use funds to maintain the dams and gates.

With no one else commenting, Miguel Segura, Director of Public Affairs and Regional Development, reminded the attendees that the deadline to submit comments was noon on November 21st. Mr. Segura also mentioned that various AACOG CDBG-MIT MOD documents were located at aacog.com/regional-services.

Mr. Segura and Ms. Mora thanked everyone for attending and closed the public hearing at 6:14 p.m.

**AACOG CDBG-MIT MOD
Public Hearing – November 9, 2022**

**Public Hearing Comments
Comment Period: November 9 – 21, 2022**

The public comments received on the Alamo Area Council of Governments (AACOG) Community Development Block Grant Mitigation (CDBG-MIT) Method of Distribution (MOD) were divided into four (groups):

1. Public Comments in Favor of the Proposed AACOG CDBG-MIT MOD
2. Public Comments Opposed to the Proposed AACOG CDBG-MIT MOD – Meadow Lake Nolte Dam Association Information on Lake's and Dam's Impact and Population Factor Consideration
3. Public Comments Opposed to the Proposed AACOG CDBG-MIT MOD – Fair and Equitable Distribution of Funds
4. Public Comments Opposed to the Proposed AACOG CDBG-MIT MOD – Use of Population as a Distribution Factor

General responses are provided for each category, as the comments received addressed specific information in similar manners.

Public Comments in Favor of Proposed ACOG CDBG-MIT MOD



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may leave the completed form with AACOG staff or mail to AACOG Public Affairs - CDBG-MIT Comments, 2700 NE Loop 410, Suite 101 San Antonio, TX 78217 by November 21st, 2022.

Good morning, these are some follow up comments from the ones I gave at the Public hearing in the City of Marion. I would like to thank all that are involved with the decisions that are needing to be made. The city of Marion like many other small cities across Texas are in need of infrastructure updates. The \$2,134,000.00 will go a long way to help offset the costs to our citizens. We have roughly 625 families that have to pay for the infrastructure within our city. After thinking about the public hearing if possible I would like to see an increase in the funding to \$3,134,000.00. Either way this MIT funds will not only help the city of Marion but our sister Cities of Santa Clara and New Berlin as we can share the proposed road work equipment that we would like to purchase (estimated \$1.1 million) Then we also need the to replace our outdated waterline, sewer lines and raise our sewer plant out of the floodplain. We have streets and drainage issues which these monies can help us with engineering costs and materials. The CDBG-MIT is a great start but as most will remind us that the larger cities with the larger tax base can pay for these services I can't tax my citizens for that amount. As I have tried to explain our situation this will not only help the City of Marion but the cities around us and I appreciate your consideration on my request to at the very least keep the City of Marion at the proposed \$2,134,000.00. Our LMI rating is 51.43%, Most small cities are in our predicament and are trying to do what is best for their citizens.

Thank you,
Mayor Victor Contreras

RESPONSE: Thank you for your comments regarding the proposed AACOG Region Mitigation Method of Distribution (MOD), as presented at the November 9, 2022 public hearing held in Marion, Texas. Your insight to a small community's tax base and how much needed funds will impact other communities in your area was good information shared. AACOG looks to have as many communities as possible benefit from CDBG-MIT funds.

**Public Comments Opposed to the Proposed AACOG CDBG-MIT MOD –
Meadow Lake Nolte Dam Association Information on Lakes' and
Dam's Impact and Population Factor Consideration**



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

I am writing regarding the distribution of the Texas Community Block Grant Mitigation Program. Instead of an equal distribution of funds, I would encourage you to distribute the funds more equitably, considering the population and socio-economics of Seguin as compared to other receiving cities. I believe the project to replace the Nolte Dam spill gates is an excellent use of these grant dollars as Meadow Lake is of great importance to the the City of Seguin and Guadalupe County.

The natural beauty of Meadow Lake is the reason we decided to move and build in Seguin after spending weekends on it for the last eight years. Meadow Lake and the Nolte Dam both positively impact the economic and cultural life of the Seguin community. Some examples include:

The Meadow Lake and the Nolte Dam recreation area offers the potential for high-end housing and enhanced recreation and tourism. We are a great example of this.

As a retired Texas public school superintendent I am very much aware of how the city and school taxes will be negatively impacted if the Nolte Dam spill gates are not repaired and Meadow Lake is subsequently drained.

The public recreation Meadow Lake provides is a draw to the Seguin Community as well with the Texas Paddling Trails, a program where Texas Parks and Wildlife and the local community have partnered to expand public access. The lake also offers boating, skiing and other water sport activities.

In the current condition, the spill gates at Nolte Dam cannot be used to manage the flood waters of the Guadalupe River and therefore pose a major hazard risk. Replacing the gates would lead to a substantial improvement in the resilience of the infrastructure.

Meadow Lake and the dams spill gates have provided a constant water level for the surrounding nature to thrive. The wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake.

The good news is MLNDA has diligently worked to be proactive and have already created and

If more room needed, use page 2

Name: Dr. Sherri Bays

Organization/Business (if applicable): Bays Consulting, LLC

Phone #: 210-825-4397

Email: bayssherri@gmail.com

The good news is MLNDA has diligently worked to be proactive and have already created and initiated a pragmatic and actionable plan to replace the spill gates at Nolte Dam which has been supported by both the city and community, and we will use any funding both wisely and effectively. This plan includes future continuation of hydroelectric power, an important green energy resource. Again, a more equitable distribution of the funds is being requested.

Thank you for your consideration.

Dr. Sherri Bays



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

I am writing to address the distribution of the Texas Community Block Grant Mitigation Program.

Nolte Dam spill gate replacement would be a prudent use of these funds. Spill gate replacement would pay dividends to the City of Seguin, Guadalupe County and Seguin I.S.D. for years to come in the form of property taxes. Without spill gate replacement, it is estimated tax values would fall to near 50%.

These gates impound waters which have created a very unique eco-system. Without spill gate replacement the waters would be returned to river levels and this eco-system would simply disappear, near hundred year old cypress trees would be gone forever, as well as the Wood ducks who use them to nest.

The impounded waters would be lost as well as the recreational value of the lake and the revenues from visitors that frequent the lake, fishermen, skiers and kayakers.

Spill gate replacement would ensure hydro electric generation continues at Nolte Dam.

Seguin and Guadalupe County have the largest population in the distribution area and have a vested interest in replacing the spill gates on Nolte Dam. Grant funding for this purpose would impact more citizens than any other project in the region, this factor should be the prime consideration for distribution of the grant funds.

Thank you for your consideration.

Tim Bays

If more room needed, use page 2

Name: Tim Bays
Organization/Business (if applicable): Bays Consulting, LLC
Phone #: 210-867-1319
Email: timbays12@gmail.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

We would like to submit our opinion on the distribution of the tax generated grant money referenced above.

We believe that instead of dividing the grant evenly among unequally populated communities it would make more sense to return it to the taxpayers on a per capita basis. Seguin has more folks in its community than all the other communities combined.

Seguin is a destination for surrounding areas to enjoy fishing and water recreation in our beautiful 90 year old Meadow Lake. It is vital to preserve this lake from draining by replacing the aging spill gates. Meadow Lake impacts the community as a whole by providing higher property values which generate more tax revenue for city, county, schools, roads; it protects wildlife habitats, fishing habitats, the century old bald cypress trees along the banks; it will insure the continuation of flood control.

The Meadow Lake Nolte Dam Association has created and initiated a plan to replace the spill gates that has the support of both the city and community. The burden of funding falls upon the few property owners along the banks of the lake but it would be wonderful if Seguin received a larger share of the grant to help.

Thank you for your consideration in the distribution of this grant in favor of per capita.

Respectful,

Hank and Helen Garrison

If more room needed, use page 2

Name: Helen Garrison
Organization/Business (if applicable):
Phone #: 210-326-3767
Email: Stillwatersfarm@gvec.net



THE HERITAGE MUSEUM

114 N River Street • Seguin, Texas 78155

November 11, 2022

To: Texas Community Block Grant Regional Mitigation Program

As president of the board of the Seguin Heritage Museum, I write this letter in request for grant funds to replace the spillgate at Nolte Dam. There are many factors involved in which our regional museum depends highly on Meadow Lake.

We rely heavily on tourism. Being a non-profit 501©(3) regional museum, we utilize income from admissions, sales of gift shop items and fundraiser items by tourists for our operations. The tourists look for affordable lodging, attractions, scenery, recreation as well as commerce. Water recreation is a large factor that offers tourists just that. The need for the lake is vital to tourism.

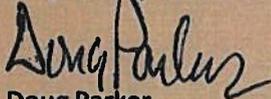
Other factors include attracting relocation of people and businesses. We also rely on memberships to support the museum. Local community is necessary for this. The existing high-end properties along the lake suffer due to decreased property values. This in turn decreases taxes for the city and school system. When this occurs the infrastructure collapses. There would no longer be attraction for growth in our city.

Flood control is the utmost value of the spillgate. Without the gates working right now, risks to upstream and downstream people and properties are exponential.

In all fairness we ask that the fund distribution is equaled proportionately to the population in each city.

Please consider all that this dam is to our community and grant the funds.

Respectfully submitted,



Doug Parker

830-660-5566

Heritagemuseum1898@gmail.com

Telephone 830-372-0965 • Email: heritagemuseum1898@gmail.com
Website: www.heritagemuseum.net

PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

Greetings,

Thank you for allowing the public the chance to express why we would like to be awarded funds from the Block Grant Regional Mitigation Program. I understand that this grant is based on community development, which is of the utmost importance to all of Seguin. The city of Seguin has a population of around 30,000, and is obviously experiencing growth. Most of these residents, whether they live in the city, the county, on the river, or out of town, enjoy the Guadalupe River.

Meadow Lake has had a huge impact on the success and future development of our city. Upon arriving in Seguin, you may pass over Meadow Lake on both the 123 ByPass, or the 123 Business Hwy. The first thing one will notice is the natural beauty and the alluring and peaceful presence of our great river, the Guadalupe, which is Meadow Lake in the city of Seguin. Meadow Lake is pictured in almost every brochure by the chamber of commerce, and other magazines and invitational advertisements as an enticement to promote Seguin, to visit Seguin, play in Seguin, and spend money in Seguin. The economic impact is a huge generator of funds for the City of Seguin, not only from the residents, but from tourism, outdoor recreation, and of course for the Seguin Independent School District. In essence, the Nolte Dam is inextricably linked to the economic and cultural success of the Seguin Community. If the floodgates are not replaced and maintained, the river will return to its natural state, and there will be a decrease in the property values of homes on the river, which in turn hurts the progress and future of our schools.

As a Seguin resident of forty-three years, I have witnessed the importance of Nolte Dam. Flash flooding has occurred many times, and if it wasn't for opening the

gates on Nolte Dam, many more lives and properties and businesses would have been lost or suffered. Texas has more "flash flooding" than any other state, and it is important we do everything we can to save lives and properties, and still be able to enjoy the river. The gates at Nolte Dam are in disrepair and have not been maintained properly. If these gates fail, the potential of flooding, loss of lives, and destruction of property is eminent. MLNDA, Meadow Lake Nolte Dam Association, has created a plan to replace the flood gates at Nolte Dam, which is supported by both the city and the community. The property owners on Meadow Lake do not have the resources to replace the floodgates without help from grants and other types of revenue. We are working hard to figure out the best way to save our Dam, not as much for the property owners, but for the the City of Seguin.

Nolte Dam has provided a constant water level for over ninety years now, and if the gates fail, or are not replaced, the environmental impact could be catastrophic. Wildlife habitats, fishing habits, the beautiful Sycamore and Bald Cypress trees, and the peaceful allure, would be greatly diminished. I fear our State Nature and Paddling Trails would be harmed and impacted as well. Tourism would be impacted and the much needed funds to keep Seguin great, would be harmed too.

Thank you for considering Seguin's need for flood control and floodgate replacement.

Sincerely,
Janet Hudson

If more room needed, use page 2

Name:Janet Hudson
Organization/Business (if applicable):
Phone #: 830-401-1461
Email: janet.hudson4@gmail.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Dear AACOG

The block grant our area is receiving will be wonderful for many needed projects. I would like you to consider Meadow Lake and the Nolte Dam spillgate replacement for some of these funds.

Meadow Lake and Nolte Dam have historically been part of Seguin recreation for many years and hopefully will be for many more. The lake is part of the Texas paddling trails program where Texas Parks and Wildlife and the local community have partnered to expand public access to the lake. The spillgates of Nolte Dam manage floodwaters of the Guadalupe river, a river known for historical flood events, and help control up stream and down stream flood events by being raised or lowered. The failure of these spillgates would severely affect the flora, fauna and recreational benefits of Meadow lake.

MLNDA has already created and initiated a pragmatic and actionable plan to replace the spillgates at Nolte Dam which has been supported by both the city and the community, and will use any funding both wisely and effectively. This plan also includes future continuation of hydroelectric power, an important green energy source.

As you deliberate the allocation of these funds, please take into consideration population, low to moderate income percentage and community size. Seguin and Nolte Dam would greatly benefit from receiving some of these funds.

Thank you for your time.

John Hudson

If more room needed, use page 2

Name: John Hudson
Organization/Business (if applicable):
Phone #: 830-379-9541
Email: johnhudson120@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Dear AACOG,

I write to you as a homeowner in the city of Seguin. For many years, our town has been blessed with Meadow Lake. Its natural beauty has served as an economic generator for Seguin. Meadow Lake and its dam, Nolte Dam, are closely linked to the economic life of Seguin.

Allowing ongoing disrepair of the Nolte Dam spillgates and resultant draining of Meadow Lake will result in a substantial decrease in values within the city of Seguin, and in its outlying neighborhoods, further resulting in substantially decreased tax revenue for the city and its school system.

I am a member of MLNDA (the Meadow Lake Nolte Dam Association), which has already created and initiated an actionable plan to replace the aged spillgates at Nolte Dam. Our plan has the support of both the city and the community at large.

Any funding received will be used effectively to repair the spillgates, and recreate the generation of hydroelectric power, an important green energy source.

Seguin's Max Starcke Park is also located along Meadow Lake and offers public lake access for recreation, including kayaking and fishing. Texas Parks and Wildlife has even partnered with the local community to further expand the trail system alongside the lake.

Nolte Dam helps manage floodwaters of the Guadalupe River. In its current condition, the dam poses risk for upstream flooding as its gates cannot be safely lowered to allow passage of flood waters. Conversely, if the gates fail, this could lead to catastrophic flooding downstream. Replacing the gates would improve the flooding infrastructure, and would help preserve the natural wildlife habitat, including not only massive riparian zones, but also hundreds of enormous bald cypresses. Distribution of the grant funds should take into account population size, relative income, and social vulnerability. The city of Seguin has a larger population than all of the other eligible cities combined. However, it appears that every eligible city is slated to receive the same amount of funding. The larger population and lower socioeconomic status of Seguin should be taken into account.

Our dam spillgate replacement plan is eligible for funding under this grant program.

Please take these factors into consideration when allocating grant funds. The city of Seguin stands to benefit immensely from Nolte Dam spillgate repair.

Thank you for your consideration

If more room needed, use page 2

Name: Mason Jones
Organization/Business (if applicable):
Phone #: 512-670-6770
Email: masondjones@yahoo.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Meadow Lake Nolte Dam Association (MLNDA) is a non-profit organization with the goal of working with Meadow Lake property owners and the Seguin community to replace the outdated spillgates on Nolte Dam. We are supporting increased funding for the city of Seguin because a portion of the CDBG-MIT funds allocated to Seguin could help to replace the spillgates and save Meadow Lake, an important economic, recreational, flood mitigation and historical resource for the city.

MLNDA has reviewed the proposed Method of Distribution (MOD) of the funds including having a representative attend and speak at the MOD public meeting. We see that the AACOG has designated that half of the grant amount (\$14.944M) be divided up evenly (\$1.494M each) between the communities of Charlotte (pop 1,554), Karnes City (pop 3,272), Lake Dunlap (pop 1,934 - 2010 census), Pearsall (pop 7,624), Dilley (pop 3,308), Seguin (pop 29,419), Kenedy (pop 3,670), Comfort (pop 2,363), Marion (pop 1,035) and Hilltop (pop 287 - 2010 census). Population numbers are Census.gov 2021 numbers unless noted. As you can see, Seguin has many times more people in its community than any of the others. In fact, Seguin has more people than all of the other communities combined. Because of that, we believe distributing even half of the funds evenly does not at all make sense, and that it would be more fair if all of these funds are distributed on a per capita basis. These funds come from the state of Texas and we assume were ultimately generated from general tax revenues; it seems that returning the funds to the taxpayers on a fair and equitable per capita basis makes more sense.

MLNDA would also like to explain how Meadow Lake benefits the Seguin community. For nearly a century, Meadow Lake's natural beauty has served as an economic generator within and near the city limits of Seguin. From housing development to outdoor recreation and tourism, Meadow Lake and the Nolte Dam area are inextricably linked to the economic and cultural life of the Seguin community. Meadow Lake and the Nolte Dam recreation area are intrinsic to the future of Seguin's economy, offering the potential for high-end housing and enhanced recreation and tourism. Allowing the disrepair of the Nolte Dam spillgates and resulting draining of Meadow Lake to the natural Guadalupe River will result in a decrease of property values on the river and a subsequent decrease in taxes for the city of Seguin and its school system. Note that MLNDA has already created and initiated a pragmatic and actionable plan to replace the spillgates at Nolte Dam which has been supported by both the city and community, and will use any funding wisely and effectively. This plan includes future continuation of hydroelectric power, an important green energy resource.

If more room needed, use page 2

Name: Meadow Lake Nolte Dam Association
Organization/Business (if applicable):
Phone #: 832-656-0520
Email: asstsecretary@mlnda.org

Public Recreation: The City of Seguin's Max Starke Park is located along Meadow Lake and offers fishing and paddling opportunities for the public. The paddling trail along Meadow Lake is part of the Texas Paddling Trails, a program where Texas Parks and Wildlife and the local community have partnered to expand public access. The lake also offers boating, skiing, fishing and other water sport activities.

Hazard Mitigation: The spillgates at Nolte Dam manage the flood waters of the Guadalupe River, a river basin known for historical flood events. In the current condition, the spillgates pose a risk to upstream flooding as some of the gates may not reliably lower to safely pass flood waters. If the spillgates catastrophically fail (as in the case of one of the sister lakes upstream), this could potentially lead to further downstream flooding. In the current condition, the gates pose a hazard risk and replacing the gates will lead to a substantial improvement in the resilience of the infrastructure.

Environmental Impact: For over 90 years, Meadow Lake and the dam's spillgates have provided a constant water level for the surrounding nature to thrive. The wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake.

Historical Significance: Built in the 1930's with steel from Carnegie Steel Company, the site is listed on the National Historic Registry. The gates are the largest of their type built in the United States and have a unique Swiss patented design, formally known as Huber & Lutz roof weir gates.

Thank you for your attention.

MLNDA Board of Directors



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Meadow Lake has been an intrinsic and valuable part the economy of Seguin for almost 100 years. Outdoor recreation, tourism, and housing development have all been positively impacted because Meadow Lake and the Nolte Dam area are linked to Seguin's culture and economy. Additionally, the Max Starke Park is located along Meadow Lake in Seguin, with fishing, boating, skiing and paddling available for the public. This paddling trail is part of the Texas Paddling Trails, a joint program between Texas Parks and Wildlife and the local communities.

The floodgates have historical significance as well. They are the largest of their type in the US, were of a Swiss design, and made from Carnegie Steel Company steel in the 1930 s. The site is listed on the National Historic Registry.

If the Nolte Dam spillgates are not repaired, Meadow Lake will cease to exist as the Guadalupe River would return to its natural level. This will lower property values on the river and result in decreased tax revenue for the city of Seguin and its school system. The beautiful cypress trees along the banks of the river and fishing habitats would also be negatively affected if the lake were drained.

The Nolte Dam spillgates are vital in management of Guadalupe River flood waters. Currently upstream flooding is a risk because some of the gates cannot be lowered to allow flood water to pass. As was demonstrated in a sister lake in recent years, if the spillgates experience catastrophic failure, severe downstream flooding could result.

MLNDA has developed a plan to replace the spillgates at Nolte Dam. This plan is supported by the city and community. All funding that is obtained will be used judiciously and prudently. The plan includes continuation of green hydroelectric power.

The grant program is tasked to consider many factors to ensure a fair distribution of funds. These include: population, low to moderate income percentage, and social vulnerability index. Current proposal is to evenly divide the funds between 10 cities. This is not an equitable distribution based on population. Seguin has a larger population than all the other eligible cities combined and also ranks well in all other factors. I respectfully request the program reconsider how funds are distributed amongst eligible cities and allocate a higher percentage of the funding to the City of Seguin.

Thank you for your time and consideration of this important issue.

If more room needed, use page 2

Name: Sandra Pence

Organization/Business (if applicable):

Phone #: 907-350-2047

Email: spence5863@yahoo.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Good Afternoon,

Seguin is unique and historic town with hard working community members. Many good things can be done to make the Seguin area safer and allow community for sustainable function within proximity to Guadalupe river.

River flow management and area improvements are essential not only to river property residents but everybody in town. City finances do not allow to do many needed improvements, including river flow management projects. Local residents cannot generate funding necessary for costly water management projects.

Considering the size of the community and number of projects required to address the needs of the Seguin it is evident that the Method of Distribution of the funds available must reflect the size of the community and number of tasks in hands to be completed: flood control, Infrastructure improvements, public facilities, development of economic opportunities and many more.

Being involved to Meadow Lake status discussions and the project to replace the spill gates and seeing how dedicated Seguin community is to sustaining the traditional river flow and how everybody cares for the river - It would be the right decision to distribute the grant to support such large projects which will be investment not only to cover current needs but also impact the future of the thousands of people and new generations of Seguin residents, tourists, new residents attracted by developments and safety made possible with grant money we are discussing today.

Respectfully,

Eugene P

If more room needed, use page 2

Name: Eugene Ponomarev
Organization/Business (if applicable):
Phone #: 210-422-1125
Email: eugene.ponomarev@outlook.com

Claudia Mora

From: Information
Sent: Tuesday, November 22, 2022 10:33 AM
To: Claudia Mora
Subject: FW: Meadow lake

Miguel Segura
Director of Public Affairs & Regional Development
Alamo Area Council of Governments
2700 NE Loop 410, Suite 101
San Antonio, TX 78217
O: (210) 362-5203
F: (866) 332-3252
www.aacog.com

From: Amy Shepherd [mailto:ameryshepherd@hotmail.com]
Sent: Wednesday, November 16, 2022 3:33 PM
To: Information <info@aacog.com>
Subject: Meadow lake

Save a Meadow Lake. If there is no river, there is no tax dollars. Texas depends on the rivers.

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PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Good day

Thank you for taking the time to round up community input. I appreciate it. Here in Seguin we have a larger population for grant dollars to make an impact. We would use the money towards the replacement of the spill gates on Meadow Lake/Guadalupe River. Meadow Lake provides a variety of public entertainment from canoeing, kyaking, paddleboards, swimming, fishing, and water skiing. Being outside in nature are activies that promote health and wellness. Additionally, these activities promote tourism that provides income to various residents but also stimulate the local economy through tourism and shopping from restuarants, groceries and recreation related equipment thus stimulating the tax base. As a two year long property owner on Meadow Lake I assure you we bought the property specifically because it was on the water as was a lifelong dream of ours. Loosing the spill gates would cause our property values to plummet and being a senior citizen with a home loan of the current property value we would become upside down on our loan and unable to sell without loosing a great deal of money and not ever be able to recoup that loss. I know that is selfish but this issue is so much bigger. Its also about prior caretakers of the damm failing to upkeep said dams for a multitude of years all along the Guadelpupe River. I assure you that I have made a donation to this endeavor and promise to make a yearly contribution to see this project to completion. We are invested this and also volunteer our time to the project as well.

Thank you for your consideration,
Jill and Alan Stechschulte - 419-583-6686 jillstechschulte@gmail.com
268 Meadow Lake Drive, Seguin Texas
Kelly and John Brumby

If more room needed, use page 2

Name: Jill and Alan Stechschulte
Organization/Business (if applicable):
Phone #: 419-583-6685
Email: jillstechschulte@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN:

I am writing to encourage the AACOG to allocate more funds to the City of Seguin. Specifically, we need funds to help with the rehabilitation of the antiquated spillway gates / dam on Meadow Lake, otherwise known as "Nolte Dam." Because these funds are designed to have a community impact, Seguin deserves an increased allocation. For nearly a century, Meadow Lake has served as an economic and community resource for the citizens of Seguin and the surrounding area. From housing developments to outdoor recreation for all citizens, Meadow Lake is a significant part of Seguin. If Nolte Dam is not repaired replaced in the near future, there is a substantial risk that Meadow Lake will be drained (see Lake Dunlap and Lake Placid - similar fates). This would severely impact property values and recreation / tourism in and around Seguin. The significant reduction in property values would substantially reduce property tax revenues for Seguin and its school system.

The local lake association is taking steps to try to repair / renovate the spillway gates on Nolte Dam, but funding is a significant issue. The grant program is designed to take into account a number of factors that fairly distribute funds, including population, low-to-moderate income percentage, and social vulnerability index. The City of Seguin has a larger population than all of the other eligible cities combined. It is not fair or equitable for AACOG to allocate even 1/2 of the funds to the eligible cities equally. Seguin deserves a much larger share based on population alone. But Seguin also ranks favorably in all the other relevant factors. Allocation of the grants needs to take into consideration the large population of Seguin, as well as the other significant needs, including renovation of Nolte Dam.

There is also a hazard mitigation consideration, that further supports increased allocation to Seguin. The spillgates of Nolte Dam manage the flood waters of the Guadalupe River. The current antiquated floodgates pose a risk to upstream properties, as some of the gates may not properly lower to pass floodwaters at the dam. Also, if the spillgates were to fail (as in Lake Dunlap), this could cause flooding downstream. Theses spillgates need to be replaced as soon as possible. The AACOG's funds could help with this repair.

I appreciate your consideration of these comments.

If more room needed, use page 2

Name: Andy Taylor
Organization/Business (if applicable): Meadow Lake Nolte Dam Association
Phone #: 713-213-5546
Email: Andytaylor78701@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

My wife and I own property on Meadow Lake in Seguin. We are members of the Meadow Lake Nolte Dam Association (MLNDA) and support that organization's efforts to find a solution to replace Nolte Dam's deteriorating spillgates and save the lake. We are hopeful some of the funds from the CDBG-MIT allocated to Seguin would be used in this effort since Meadow Lake is such an important economic, social, recreational and environmental part of the Seguin Community, as well as aiding in flood mitigation along the Guadalupe River. MLNDA has initiated a plan to replace the spillgates, but the project needs funding. We just voted in creating a WCID (90.6% support) which would pay for the replacement by taxing property owners adjacent to lake. We are concerned that the tax rate will not pass in next year's election though if we cannot get it low enough (with supplemental funds) to make sense for property owners on the lake. If the WCID rate does not pass, the district will be dissolved and Meadow Lake will be drained. GBRA has already made it clear that this is their intention if MLNDA cannot show them that the spillgate replacement can be funded. It would be a shame for Seguin to lose such an important resource. I have reviewed the PowerPoint presented. I do not understand why the AACOG has designated that half of the grant amount be divided up evenly (\$1.494M each) instead of based on population. Seguin has many times more people in its community than any of the others, more people than all of the other communities combined. I feel like the AACOG should re-visit this MOD and find a more equitable way to divide up this portion of the funds. Even if you decided on a minimum amount each community should receive, then based the remainder on per capita division, that would be a much fairer than the current MOD. Thank you for your consideration.

if more room needed, use page 2

Name: Grant and Rose Wilson
Organization/Business (if applicable):
Phone #: 210-630-0389
Email: grant_wilson@att.net



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

To Whom It May Concern:

I am writing to request re-consideration for the method of distribution for CDBG-MIT funds. If I understand correctly, grant funds will be distributed evenly among 10 communities without consideration for population. Seguin has a higher population than all other 9 communities combined, yet will receive the same amount as each of the other 9 communities.

This method of distribution doesn't seem right, as it would seem more equitable if funds were distributed on a per capita basis. These funds coming from the State of Texas were generated from general tax revenue (again, if I understand correctly). It seems that returning the funds to the taxpayers on an equal basis per capita makes more sense.

Regarding the importance of the project to replace the spill gates at Meadow Lake: this lake is a treasure for anyone visiting, as it is beautiful and peaceful. It brings together families and communities as the water draws them to spend time together. Just one example: our church has conducted 20-30 baptisms in the lake at our property, and it is always a moment that binds us.

In addition to the natural beauty and relationships built and strengthened on the lake, it brings in a great deal of money to our community. We run a vacation rental on Meadow Lake, and I can't tell you how many people this summer asked about water levels because of the drought. They came here because we have water. Our guests come to town, eat at Burnt Bean and La Playa Pop Shop, play at Starke Park, fill their gas tanks at Pic Pac, shop at Gifts and Gourmet, and buy lots of groceries and beer. The activity of our guests generates the need for housekeepers and tradespeople, who all come from our community. And I pay a large amount of hotel occupancy taxes every quarter, back to the City, County, and State based on our revenues.

As a comparison, our vacation rental on what used to be Lake Placid has dropped >50% in gross income over the past year that the lake has been drained. If the spillgates fail and aren't replaced at Meadow Lake, our community's financial health will be significantly affected.

Thank you for your time and attention to this matter.

Sincerely, Laura Wooley

If more room needed, use page 2

Name: Laura Wooley
Organization/Business (if applicable): CtxBnb
Phone #: 830-433-7778
Email: ctxbnb@gmail.com

RESPONSE: Thank you for your comments regarding the proposed AACOG Region Mitigation Method of Distribution (MOD), as presented at the November 9, 2022 public hearing held in Marion, Texas. MLNDA's information regarding Meadow Lake and the Nolte Dam was very insightful. AACOG supports infrastructure projects which maintain the quality of life and economic development of communities in the Alamo region. In developing the MOD, AACOG sought to allocate funding to communities that meet the LMI national objective city-wide an equal distribution of half of the total allocation to AACOG. Small communities typically do not have the population or tax base to support much needed infrastructure maintenance, repairs and replacement projects in their municipalities. AACOG believes prioritizing LMI for the allocation of CDBG-MIT funds at the county level, and affording communities with a 51% LMI population an equal distribution of the remaining funds, is the best way to ensure equity and impact in the qualifying communities. Guadalupe County is receiving an allocation out of the other 50% that is designated for the eligible counties, totaling \$3,082,235.04. These allocations were strategically distributed to encourage partnerships for regional projects, and afford the county the ability to supplement any of their cities' projects that may need additional funds for their local projects. The CDBG-MIT funds are from Federal grants. The Texas General Land Office (TxGLO) administers the CDBG-MIT funds from the U.S. Department of Housing and Urban Development (HUD) on behalf of the State of Texas.

**Public Comments Opposed to the Proposed ACOG CDBG-MIT MOD –
Fair and Equitable Distribution of Funds**



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Dear Members of the Texas Community Block Grant Regional Mitigation Program,

We are 25-year residents of Seguin, Guadalupe County, Texas. Our town is one of historical significance, commercial force, and great future potential. However, we currently find ourselves in a dangerous plight regarding an aging and failing infrastructure which shapes a central feature of our community -- Meadow Lake. Formed by the placement of flood-mitigating/hydroelectric-producing gates placed on the Guadalupe River within Seguin in the 1930's, these critical structures are now deteriorating and imminently, they will fail.

The existence of this lake generates tax funds with which Seguin operates and represents future funds possible through development opportunities along its banks, as well as potential increased hydroelectric revenue. By repairing these imminently failing floodgates before they catastrophically fail, significant damage to/loss of life and property will be avoided. There is no question that these floodgates must be replaced and that all Seguin residents will benefit.

As the population of our town is a large portion of Guadalupe County's population, a grant to assist with the replacement of infrastructure of such significance to our community provides a tremendous opportunity to impact a great number of people with the limited resources provided within this grant.

Thank you for your consideration of our critical need.

Janna and Brian Fink
(830) 660-7967 and (830) 857-0455
jannafink@ymail.com and bwfink@yahoo.com

If more room needed, use page 2

Name: Janna and Brian Fink
Organization/Business (if applicable):
Phone #: (830) 660-7967 and (830) 857-0455
Email: jannafink@ymail.com and bwfink@yahoo.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

The following comments are based on the information presented in your April 27, 2022 slide presentation (MOD) for cities MOD A.

My family and I respectfully request that your method of distribution be based on a population density basis as opposed to your slide distribution of equal amounts per each city.

As taxpayers, the funds to be distributed are a result of our individual taxation and should be distributed on a population basis. Thank you.

If more room needed, use page 2

Name: Atlee E. Fritz
Organization/Business (if applicable): Taxpayer
Phone #: 830-433-0140
Email: Atlee@aefmfg.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

I encourage the AACOG to (1) distribute the block grants funds based on population distribution, (2) economic impact, (3) environmental impact, (4) hazard mitigation, and historical significance.

Hazard Mitigation: The spillgates at Nolte Dam manage the flood waters of the Guadalupe River, a river basin known for historical flood events. In the current condition, the spillgates pose risk to upstream stream flooding as some of the gates cannot currently lower to safely pass flood waters. If the spillgates catastrophically fail (as in the case of one of the sister lakes upstream), this could potentially lead to further downstream flooding and severe consequences. In the current condition, the gates pose a major hazard risk and replacing the gates would lead to a substantial improvement in the resilience of the infrastructure.

Environmental Impact: For over 90 years, Meadow Lake and the dam's spillgates have provided a constant water level for the surrounding nature to thrive. The wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake. Meadow Lake has created an ecosystem that supports numerous plants and wildlife unique to Central Texas and within AACOG.

Historical Significance: Built in the 1930s with steel from Carnegie Steel Company, the site is listed on the National Historic Registry. The gates are the largest of their type built in the United States and have a unique Swiss patented design, formally known as Huber & Lutz roof weir gates. Unlike the other dams within the Guadalupe River Basis, the proposed repairs at Nolte Dam will not change the dam foundation or size and thus preserve the dam's historical significance.

Public Recreation: The City of Seguin's Max Starke Park is located along Meadow Lake and offers fishing and paddling opportunities for the public. The paddling trail along Meadow Lake is part of the Texas Paddling Trails, a program where Texas Parks and Wildlife and the local community have partnered to expand public access. The lake also offers boating, skiing and other water sport activities.

If more room needed, use page 2

Name: Brent Hammond

Organization/Business (if applicable): Meadow Lake WCID Board Member

Phone #: 512-744-5734

Email: jbrent95@yahoo.com

PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN:

I own property on Meadow Lake in Seguin. I have lived on Meadow Lake for 6 years. I am a member of Meadow Lake Nolte Dam Association. We recently voted on creating a WCID (90.6% support) which would pay to replace the spillgate by taxing property owners adjacent to the lake. We are needing supplemental funds to help lower the tax rate to make sense for the property owners. If the WCID rate does not pass the district would be dissolved and GBRA would drain Meadow Lake. This would be bad for the property owners and for the City of Seguin.

I do not understand why the AACOG has designated that half of the grant amount be divided up evenly (1.49M each) instead of based on population. Seguin has many times more people than any of the other cities. I think the Method of Distribution should be per capita than the way it is divided now.

Thank you very much,

If more room needed, use page 2

Name: Roxanne Henricksen
Organization/Business (if applicable): n/a
Phone #:210-710-4769
Email:roxxy1031@gmail.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Thank you for giving us the opportunity to speak on how the funds are distributed by the AACOG.

Population of each town

Seguin (pop 30,902)
Pearsall (pop 7,637)
Kenedy (pop 3,626)
Dilley (pop 3,310)
Karnes City (pop 3,270)
Comfort (pop 3,018)
Lake Dunlap (1,934)
Charlotte (pop 1,554)
Marion (pop 1,044)
Hilltop (pop 196)

I am in favor of splitting the available funds on a per capita basis which seems like a more fair and equitable distribution. I am sure every town has a need. Giving taxpayers back equitably what they have contributed seems like the most reasonable way of splitting the funds. I also ask to consider the 50/ 50 split and maybe that needs to change to allocate more money to the above listed towns. I am sure everyone has a project they would love to fund, but let's be fair in how we give that money. It does not seem right to allocate \$7622 per person living in Hilltop and Seguin only receive \$48 per citizen. I appreciate your thoroughness and thoughtfulness on this and look forward to hearing what you come up with!

If more room needed, use page 2

Name: Jenny Litten

Organization/Business (if applicable): Realtor

Phone #: 336-254-9560

Email: iamjennylitten@gmail.com

PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

My wife and I moved to Seguin about 10 months ago, specifically to be on Meadow Lake. We had visited here in past years and always found the community to be open, friendly and 'authentic'. So when I retired we decided to make Seguin our home.

We were specifically drawn to Meadow Lake, as we had rented homes, kayaks and tubes for family fun over the years and spent time in the town and various restaurants.

The possible failure of Nolte Dam would be devastating to the community of Seguin, especially those individuals living on the lake and those whose livelihoods are tied to the lake. The loss of income from a failure of the dam would be substantial, not to mention the loss of tax revenue from the devaluation of property values, impacting not only Seguin, but the school district and county as well.

This community is not a 'rich' one. I would characterize Seguin as a blue collar town, with most folks working service or manual labor jobs. We have followed the saga of the dam failures on the Guadalupe River with alarm, and hold our breath every time there is a heavy rain in the watershed. When we learned of the grant program available thru AACOG, it seemed heaven sent. However, when we learned of the allocation of approximately half of the funds to the various communities, we were shocked to hear that Seguin, with a population of approximately 30,000 souls, was allocated essentially the same funds as communities with populations around 3,000. This allocation is patently unfair to the residents of Seguin and we ask AACOG to reconsider this allocation to more fairly represent the number of citizens of Seguin.

If more room needed, use page 2

Name: Mark & Vicki McCoy
Organization/Business (if applicable):
Phone #: 210-827-2974
Email: markgmccoy7@gmail.com

PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

It is our understanding that AACOG has designated that half of the grant amount (\$14.944M) be divided up **evenly** (\$1.494M each) between the communities of Charlotte (pop 1,554), Karnes City (pop 3,270), Lake Dunlap (pop 1,934), Pearsall (pop 7,637), Dilley (pop 3,310), Seguin (pop 30,902), Kenedy (pop 3,626), Comfort (pop 3,018), Marion (pop 1,044) and Hilltop (pop 196).

Seguin has **many** more people in its community than any of the others. These funds come from the state of Texas and we assume were generated from general tax revenues; it seems that returning the funds to the taxpayers on an equal basis makes more sense.

We feel that these funds should be distributed on a per capita basis rather than giving each city no matter their size the same amount.

In addition, there are significant infrastructure needs in Seguin with respect to the Meadow Lake Dam. This and the other lakes provide significant cultural, social and economic benefit to the community. This grant would go a long way to ensuring the long-term viability of the Dam for this and future generations.

If more room needed, use page 2

Name: Sean Ramsey

Organization/Business (if applicable):

Phone #: 512-801-3630

Email: seanrmsy@gmail.com

A. ROBERT RAETZSCH

Attorney at Law
202 North Camp Street
Seguin, Texas 78155
(830) 303-2906
E-mail: Raetzsch@aol.com

RE: PUBLIC COMMENT REGARDING TEXAS COMMUNITY DEVELOPMENT BLOCK GRANT REGIONAL MITIGATION PROGRAM (CDBG-MIT)

November 19, 2022

The City of Seguin has by far the largest population of any city or community being considered for receiving half of the current CDBG-MIT grant ("Grant") based on an equal amount per community. The population of the City of Seguin is more than the population of all the other communities combined. This does not make sense because the population of the communities varies so greatly and it will result in skewed results. For example, the Hilltop Community with a population of 196 will receive the same amount of this portion as Seguin with a population of 30,902. The amount being divided equally between communities is \$14,944,000. There are nine communities to receive equal shares of this amount. Therefore, Hilltop will receive \$8,471.66 per resident of this money while the City of Seguin, will receive \$53.74 per person of this portion of the Grant. **This is not fair to the people of Seguin, and a much more equitable way to divide the half of the Grant being considered to be divided equally between the various communities is to divide the money on a per capita basis instead.**

The City of Seguin certainly qualifies under the criteria for distributing the Grant. Seguin is also a community that has a high level of people living in poverty and of moderate income. There is also a large Spanish speaking population and a majority of its residents are Hispanic, an ethnic group that has traditionally been at risk. My assumption is that if you were to divide the communities being considered by number of people in poverty and moderate income, the number of Seguin residents fitting into that category would be greater than the rest of the communities combined.

The City also often has a flooding control problem which will affect economic development, which are both eligible activities for the Grant. Currently, the flood gates at Nolte Dam on the Guadalupe River are in peril of being lowered or destroyed. This will result in a catastrophic impact on the City and its residents as the amount of water remaining will be more akin to a creek than a lake.

Meadow Lake has served the Seguin community and been an economic boost for almost a century. It is a focal point for visitors and tourism to the City and many homes are located on it. There is also public access at a number of locations to Meadow Lake and one of Seguin's nicest parks, Starcke Park East is located on it. People can access the lake from the park and use it for canoeing, fishing, kayaking and swimming. It is also a listed Paddle Trail by the State Parks and Wildlife.

Page 2

November 19, 2022

Comment regarding Community Development Block Grant Regional Mitigation Program
(CDBG-MIT)

The destruction of the lake will also have an impact on the values of the property adjacent to it affecting the taxes generated for the City of Seguin, Seguin Independent School District and Guadalupe County. There is undeveloped land along Meadow Lake and the destruction of the lake will have a serious impact on future economic development where the lake currently is, which has a lot of land that is eligible and ripe for development, assuming it remains lake front property.

Additionally, there will be an impact on flooding which could have catastrophic results. The gates of the dam are manipulated during periods of high rain to regulate the amount of water that flows through the river in an attempt to mitigate potential damage along the river.

The residents along the lake have created a Water Control Improvement District and are confident that the organizations are in place which will allow the dam creating the lake to be maintained and repaired. The organization is working on ways to finance the needed improvements and any source of revenue will be beneficial to the continuance of Meadow Lake, which is a major asset to the City of Seguin and its residents.

For the reasons above, and many others, the City of Seguin is an exemptional beneficiary of as large a portion of the Grant as it can receive. Certainly based on the number of people affected in Seguin versus the other communities to receive half the Grant equally per community among nine communities with much smaller populations is not fair to the City of Seguin, nor its residents and is not an equitable way to allocate the Grant.

Sincerely,

A. Robert Raetzsch

A. Robert Raetzsch

ARR/hs



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

AACOG,

As a business owner in the City of Seguin, I am writing today to urge the council to consider the importance of rehabilitating Nolte Dam at Meadow Lake.

The lake is an important part of our city and our county. JMC Associates relocated our home and our business to Seguin based on Meadow Lake and the proximity to Downtown Seguin. The lake is a beautiful asset to our community, and if drained will become an eyesore as Placid has become. The Downtown and Meadow Lake draw people to our town and our waterway to enjoy water activities, shopping, dining and the history of Guadalupe County's Seat.

Seguin has a population 30,902, more than Charlotte, Karnes City, Lake Dunlap, Pearsall, Dilley, Kenedy, Comfort, Marion and Hilltop combined. Please reconsider the method of distribution weighing the population into your calculation and the distribution of funds.

JMC Associates
104 N Austin Street
Seguin, TX 78155

If more room needed, use page 2

Name: Miriam Jones

Organization/Business (if applicable): JMC Associates

Phone #: 512.587.2298

Email: miriam@jmcassociates.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

After hearing how the AACOG currently is designating that half of the grant money (\$14.944M) is to be distributed equally between the communities of Charlotte (pop 1,554), Karnes City (pop 3,270), Lake Dunlap (pop 1934), PearsLL (pop 7,637), Dilley (pop 3,310), Seguin (pop 30,902), Kenendy (pop 3,626), Comfort (pop 3,018), Marion (pop 1,044), and Hilltop (pop 196). As you can see, Seguin has many more people than any of the other communities even if all the others were combined. These funds come from the state of Texas and assume that they are generated from general tax revenues. To distribute the funds evenly does not make sense to me. The funds should be allocated per capita rather than evenly. Meadow Lake/Nolte dam is located in the City of Seguin and provides an attraction for the visitors of the City as well as its citizens. Please consider allocating these funds on a per capita basis or at the very least give the City of Seguin the maximum allowable grant funding.

Thank you for your consideration,

Rick Miller
Property Owner Meadow Lake
184 Wampum Way
Seguin, Tx 78155

If more room needed, use page 2

Name:
Organization/Business (if applicable):
Phone #:
Email:

Claudia Mora

From: Information
Sent: Tuesday, November 22, 2022 10:29 AM
To: Claudia Mora
Subject: FW: Texas Community Block Grant Public Comment

Miguel Segura
Director of Public Affairs & Regional Development
Alamo Area Council of Governments
2700 NE Loop 410, Suite 101
San Antonio, TX 78217
O: (210) 362-5203
F: (866) 332-3252
www.aacog.com

From: Doug Parker [mailto:doughparker@yahoo.com]
Sent: Monday, November 21, 2022 11:18 AM
To: Information <info@aacog.com>
Subject: Texas Community Block Grant Public Comment

Dear AACOG Community Block Grant Review Committee Members,
I wish to go on record of supporting for the rewarding of The Texas Community Block Grant to the City of Seguin for our share of the \$29,888,000.00 for the use of repairing the spillway of the Meadow Lake/Nolte Dam.

I am the owner of Parker's City Pharmacy, 1005 E. Court Street and the Past Chair of The Seguin Area Chamber of Commerce (2020 - 2022) and as such I am well informed as to the importance of the repair of that spillway to the continue financial growth and health of our community.

Additionally, I wish to express that I feel that it is inappropriate for that \$29,888,000.00 to be divided up EQUALLY rather than the City of Seguin not getting a larger share that the less populated other grant recipients such as Karnes City, Kennedy, Pearsall and Marion, Texas.

Sincerely,

Douglas H. Parker, R.Ph., President, and Immediate Past Chair Seguin Chamber of Commerce
Parker's City Pharmacy, Inc.
1005 E. Court St.
Seguin, Texas 78155



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

The CDBG-MIT program funds is a wonderful boon for communities trying to do great things. We appreciate its importance to us and surrounding communities.

I believe the intent of the program is to do the most good - tender the greatest impact. If so, then distributing the money on a per capita makes the most sense, is fair, and equitable.

Considering these are tax dollars being re-directed back to the communities from whence they originated, it is appropriate the money is directed accordingly.

Thank you for your efforts to make this program successful.

If more room needed, use page 2

Name: Scotland Roddy

Organization/Business (if applicable):

Phone #: 702.374.8570

Email: Scottlandroddy@yahoo.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

I would ask the council to give strong consideration to dividing the Grant funds on the basis of number of people who would benefit from funding. It doesn't make sense for a community of 1,500 people to get the same funding as a community of 30,000.

Thank you for considering my concerns.

Regards,
Brent Wenger

If more room needed, use page 2

Name: Brent Wenger
Organization/Business (if applicable):
Phone #: 512 791-8920
Email: brentwenger75@gmail.com

RESPONSE: Thank you for your comments regarding the proposed AACOG Region Mitigation Method of Distribution (MOD), as presented at the November 9, 2022 public hearing held in Marion, Texas. We appreciate the insight into Meadow Lake as an economic generator for Seguin. AACOG believes prioritizing LMI for the allocation of CDBG-MIT funds at the county level, and affording communities that meet the LMI national objective city-wide an equal distribution of half of the total allocation to AACOG. Guadalupe County is receiving an allocation out of the other 50% that is designated for the eligible counties, totaling \$3,082,235.04. These allocations were strategically distributed to encourage partnerships for regional projects, and afford the county the ability to supplement any of their cities' projects that may need additional funds for their local projects.

**Public Comments Opposed to the Proposed ACOG CDBG-MIT MOD –
Use of Population as a Distribution Factor**

CITY OF SEGUIN

RESOLUTION NO. 2022R-179

STATE OF TEXAS

RESOLUTION OF THE CITY COUNCIL OF SEGUIN, TEXAS REQUESTING THAT THE ALAMO AREA COUNCIL OF GOVERNMENTS ALLOCATE FUNDS FROM THE GENERAL LAND OFFICE REGIONAL MITIGATION PROGRAM BASED ON THE ACTUAL POPULATION FOR EACH CITY SUBJECT TO ALLOCATION OF THE FUNDS

WHEREAS, the Texas General Land Office (GLO) has allocated \$29,888,000 to the Alamo Area Council of Governments (AACOG) for the Regional Mitigation Program as part of the Texas Community Bloc Grant Mitigation; and

WHEREAS, AACOG is proposing to divide the funds between the counties and seven cities that are low-to-moderate income (LMI Cities); and

WHEREAS, the AACOG formulation proposes to allocate funds equally to the LMI Cities; and

WHEREAS, the LMI Cities vary greatly in population and percentage of LMI population; and

WHEREAS, AACOG is, as required, holding a public hearing on the funding allocation.

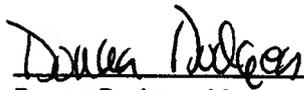
NOW THEREFORE BE IT RESOLVED BY THE CITY OF SEGUIN, TEXAS:

SECTION 1. The City Council of Seguin, Texas, believes that given the wide disparity of population size the allocation of funds should be based on the population for each of the LMI Cities.

SECTION 2. The Seguin City Council believes that the actual number of low-to-moderate income persons is directly related to a city's need for mitigation funding and should be considered in formulating an equitable allocation.

SECTION 3. The Seguin City Council hereby urges that the Alamo Area Council of Governments consider population for formulating the method of distribution for the GLO funding.

PASSED this 15th day of November, 2022.



Donna Dodgen, Mayor

Attest:



Naomi Manski, City Secretary



11-15-2022

2022R-179



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may leave the completed form with AACOG staff or mail to AACOG Public Affairs - CDBG-MIT Comments, 2700 NE Loop 410, Suite 101 San Antonio, TX 78217 by November 21st, 2022.

My name is Jason and I am a resident of
Seguin.
I believe AACOG should use population as the factor in allocating
Funds rather than just dividing it up between the 7 cities.
With the size of Seguin compared to the size of the other cities I
believe Using population would be a better way to divide up the
fun ds. Seguin has many projects that the 8.9M could be applied
to for the benefit of the city.
Thanks,
Jason B.



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

The Meadow Lake community and the city of Seguin are raising funds to replace the spillgates on the dam in Seguin. Please consider allocating funds from the state of Texas based on per capita basis. Since we generate the taxes, it makes sense to allocate the funds per capita.

Thank you for considering this position.

Dianne Billings
Owner 298 Meadow Lake
Seguin, Texas

If more room needed, use page 2

Name: Dianne Billings
Organization/Business (if applicable):
Phone #: 713-598-5243
Email: diannebillings@sbcglobal.net



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Thank you for the opportunity to speak at AACOG's Method of Distribution meeting in Marion on November 9, 2022, to discuss the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. Two scenarios were presented: 1) equal distribution of available funds to each jurisdiction resulting in an equal amount of dollars allocated to each geographic area, and 2) per capita distribution of funds to each jurisdiction resulting in an equal amount of dollars allocated to the population of each jurisdiction. Since the grant funds come from the state of Texas and those funds ultimately came from general tax revenues (assumption), it seems that returning the funds to the tax payers on an equal basis makes more sense. These grant funds, while generous and targeted for a variety of community improvements means that the competition for maximum grant funding is understandably fierce.

Regarding the purpose of the funds, Seguin is seeking these grant funds to assist in dam spillgate replacement to prevent further damage to the community's built and natural environments. Seguin has a long history of Guadalupe River flooding and with increased growth, it is anticipated that a larger "cement footprint" will result in less drainage from weather related events and a greater potential for adverse effects on the surrounding acreage and the people, animals, and buildings that occupy these areas. While the Guadalupe River is a main artery throughout the Hill Country all the way to the Gulf of Mexico, it runs right through the center of Seguin and is a key reason for residential and business growth and tourism in the area.

Starcke Park, just south of downtown Seguin is an area that boasts many recreational opportunities from a municipal golf course, tennis courts, volleyball courts, covered pavilion, little league fields, running trails, a disc golf course and an ideal location for water sports such as boating and canoeing/kayaking. The play areas attract families and visitors alike for such activities as birthday parties, chili cookoffs, cross country meets and 5k runs. There is a community pool nearby and a rodeo arena next to the coliseum that resides adjacent to the park. Nearing completion is a walking/hiking trail that will run from Highway 78 south to Starcke park offering a resource for exercise and transportation connecting many local amenities and organizations such as the MTR Skate Park, Spirit of Joy Church and the Seguin-Guadalupe County public library. All of these amenities are part of what

If more room needed, use page 2

Name: Whitney Bischoff

Organization/Business (if applicable): Meadow Lake Resident

Phone #: 830-556-7440

Email: wrbischoff@gmail.com

makes Seguin a great place to live and work for the young, families, and retired individuals alike.

Meadow Lake is a key part of the city's identity and charm. Water from the lake is what sustains the pecan grove in the park, hosts aquatic ecosystems and represents both a tangible and intangible asset to an area experiencing the effects of global warming. Having a body of water in the center of town is both an economic and ecologic asset that we do not want to lose.

Meadow Lake faces two scenarios. Continue to restrict activities on the lake due to the age of the existing dam and its potential to give way unexpectedly (this is the Lake Dunlap scenario) resulting in a dewatering of the lake and a loss of the recreational, economic, and ecologic benefits it brings. The other scenario is to repair the dam spillgate in order to maintain our lake and its contribution to our quality of life.

Those of us who have proximity to the lake or who regularly access the many activities associated with the lake and its adjacent parks and recreation areas fear that failure to maintain the dam in a timely fashion may result in a loss of businesses and area growth if this main asset ceases to exist. Losing the lake would result in the type of desertion experienced by towns that lose their railroad or their seaport. Growth would stop and people seeking the quality of life we now enjoy would move elsewhere.

The Guadalupe River is literally the life blood of our city and many of our businesses. This grant offers us an opportunity to move forward with our preferred scenario of repairing the dam spillgate of the Nolte Dam to maintain the recreational, ecologic, and economic asset that is so intertwined with life in Seguin. A grant from HUD through AACOG would help us to maintain our quality of life in Seguin.



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Community Impact: As this grant is based on community development, it's important to discuss the ways Meadow Lake benefits the community. Examples include:

For nearly a century, Meadow Lake's natural beauty has served as an economic generator within the city limits of Seguin. From housing development to outdoor recreation and tourism, Meadow Lake and the Nolte Dam area are inextricably linked to the economic and cultural life of the Seguin community.

The Meadow Lake and the Nolte Dam recreation area are intrinsic to the future of Seguin's economy, offering the potential for high-end housing and enhanced recreation and tourism.

Allowing the disrepair of the Nolte Dam spillgates and resulting draining of Meadow Lake to the natural Guadalupe River will result in a decrease of property values on the river and a subsequent decrease in taxes for the city of Seguin and its school system.

MLNDA has already created and initiated a pragmatic and actionable plan to replace the spillgates at Nolte Dam which has been supported by both the city and community, and will use any funding both wisely and effectively. This plan includes future continuation of hydroelectric power, an important green energy resource.

Public Recreation: The City of Seguin's Max Starke Park is located along Meadow Lake and offers fishing and paddling opportunities for the public. The paddling trail along Meadow Lake is part of the Texas Paddling Trails, a program where Texas Parks and Wildlife and the local community have partnered to expand public access. The lake also offers boating, skiing and other water sport activities.

If more room needed, use page 2

Name: Ashley Buchanan
Organization/Business (if applicable):
Phone #: 830.708.0109
Email: ashley@lakehouses4sale.net

Hazard Mitigation: The spillgates at Nolte Dam manage the flood waters of the Guadalupe River, a river basin known for historical flood events. In the current condition, the spillgates pose risk to upstream stream flooding as some of the gates cannot currently lower to safely pass flood waters. If the spillgates catastrophically fail (as in the case of one of the sister lakes upstream), this could potentially lead to further downstream flooding and severe consequences. In the current condition, the gates pose a major hazard risk and replacing the gates would lead to a substantial improvement in the resilience of the infrastructure.

Environmental Impact: For over 90 years, Meadow Lake and the dam's spillgates have provided a constant water level for the surrounding nature to thrive. The wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake.

Historical Significance: Built in the 1930's with steel from Carnegie Steel Company, the site is listed on the National Historic Registry. The gates are the largest of their type built in the United States and have a unique Swiss patented design, formally known as Huber & Lutz roof weir gates.

Claudia Mora

From: Information
Sent: Tuesday, November 22, 2022 10:32 AM
To: Claudia Mora
Subject: FW: Mitigation Program (CDBG-MIT) funds

Miguel Segura
Director of Public Affairs & Regional Development
Alamo Area Council of Governments
2700 NE Loop 410, Suite 101
San Antonio, TX 78217
O: (210) 362-5203
F: (866) 332-3252
www.aacog.com

From: Sydney Burton [mailto:sydney.burton@gmail.com]
Sent: Thursday, November 17, 2022 7:22 PM
To: Information <info@aacog.com>
Subject: Mitigation Program (CDBG-MIT) funds

PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

The idea that half of the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds might be equally distributed, no matter how many people reside in the 6 different communities, defies imagination. How can this be fair to all of the citizens within the area, when one of the communities (Hilltop) has a population of 196 and Seguin's population is 30,902? It would be far more equitable if all of the funds were distributed on a "per capita" basis.

Regarding the purpose of the grant, I would like to mention that Seguin is facing a possible catastrophic flood event, due to the probability that Nolte Dam/Meadow Lake gates will fail in the not too distant future. Out of the 6 Guadalupe River Dams within the purview of GBRA, 4 have already failed, due to the fact that they are about 90 years old & have not been properly maintained by the River Authority for decades.

Meadow Lake winds through a large section of Seguin. When there is a flood event (which we all know periodically occurs), without functioning gates, there could be catastrophic consequences. Large items such as RVs, autos, and large structures that swiftly move down a raging river will create a dangerous situation, with bodily injuries or death to our citizens, along with profound property damage. Don't we want to take steps NOW to PREVENT this from occurring? Flood mitigation is vital to this area!

This is why I am recommending that Seguin receives its fair share of the grant being distributed by AACOG based on its population. Please consider the importance of saving lives and property. **FUND COMMUNITIES BASED ON THEIR POPULATIONS!** Thank You

If more room needed, use page 2

Name: SYDNEY BURTON
Organization/Business (if applicable): MEMBER OF MLNDA
Phone #: 830-305-3654
Email: sydney.burton@gmail.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Aside from the residents of Meadow Lake suffering significant financial loss should they not secure funds to replace their deteriorated spillgates, the lake has provided recreational value to the citizens of Seguin for nearly 100 years. Having funds allocated to their project would go a long ways to help them secure the future of the lake for generations to come!

If more room needed, use page 2

Name: Hagan Cohle
Organization/Business (if applicable): Keller Williams Realty -The Lakefront Group
Phone #: 830-708-6287
Email: hagan@lakehouses4sale.net



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

I am writing to you today regarding the allocation of funds for the Texas Community Block Grant Mitigation Program. I am concerned that at this time all of the communities are receiving equal amounts of funding. I urge you to consider the distribution of these funds on a per capita basis rather than giving each community, no matter their size, the same amount.

Seguin not only has more people in its community than any of the other receiving entities, it has more people than the others combined. In light of this, I ask that you allocate to the city of Seguin the maximum grant funding.

The City of Seguin and Guadalupe County benefit both economically and culturally from Meadow Lake. MLNDA has developed and initiated a pragmatic and actionable plan to replace the spill gates at Nolte Dam which has both city and community support.

I urge you to reconsider the allocation of funds and award Seguin in the maximum grant funding. Thank you for your consideration.

Darrin Dugi

If more room needed, use page 2

Name: Darrin Dugi
Organization/Business (if applicable):
Phone #: 210-442-8168
Email: dugiranch@outlook.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

I am excited to learn the project to replace the Nolte Dam spill gates is eligible to receive funding from the Texas Community Block Grant Mitigation Program. However, I am asking that you reconsider the distribution of these funds based on the population and socio-economic status of Seguin as compared to other receiving entities. Seguin not only has more people in its community than any of the other receiving entities, it has more people than the others combined. In light of this, I ask that you consider the funds to be distributed on a I ask that you allocate to the city of Seguin the maximum grant funding. The City of Seguin and Guadalupe County benefit both economically and culturally from Meadow Lake.

Meadow Lake and the Nolte Dam recreation area offers the potential for high-end housing and enhanced recreation and tourism. The lake also offers boating, skiing and other water sport activities. The paddling trail along Meadow Lake is part of the Texas Paddling Trails, a program where Texas Parks and Wildlife and the local community have partnered to expand public access.

Meadow Lake and the dam's spill gates have provided a constant water level for the surrounding nature to thrive. The wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake.

If the Nolte Dam spill gates are not repaired they cannot be used to manage the flood waters of the Guadalupe River and therefore pose a major hazard risk. Replacing the gates would lead to a substantial improvement in the resilience of the infrastructure. Likewise, if the spill gates are not repaired, and Meadow Lake is subsequently drained, the city and school taxes will be negatively impacted.

MLNDA has developed and initiated a pragmatic and actionable plan to replace the spill gates at Nolte Dam which has both city and community support. This plan includes future continuation of hydroelectric power, an important green energy resource. Any grant funding would be used both wisely and effectively.

I urge you to distribute the funds more equitably, considering the population and socio-economics of Seguin as compared to other receiving cities.

Francine Dugi



If more room needed, use page 2

Name: Francine Dugi
Organization/Business (if applicable):
Phone #: 210-422-0126
Email: francinedugi@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN and Guadalupe County

Current Infrastructure, Meadow Lake Dam, located on Guadalupe River created and sustaining Meadow Lake is in need of replacement. Dam is in disrepair. Determined that it is not repairable. Currently used as of a Flood and drainage control of storm water affecting Seguin and downstream communities. Replacement of Original Structure is required.

If more room needed, use page 2

Name: Jesus T Garcia Jr
Organization/Business (if applicable): Meadow Lake Homeowners
Phone #: 210 844-4686
Email: jtgarciajr@yahoo.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

We are writing today to discuss the benefits of MeadowLake to the City of Seguin and surrounding areas and the extreme need to replace the spillgate/floodgate on MeadowLake.

The City of Seguin is the largest population and economic center for allocation of populated Texas residents and has the biggest potential for economic return on investment in saving the lake by replacing the floodgates supported with grant money. For over 90 years, MeadowLake with its natural beauty has served as an economic generator within the city limits of Seguin. From housing development to outdoor recreation and tourism, Meadow Lake and the Nolte Dam area are a key to the economic and cultural life of the Seguin community providing enhanced recreation and tourism to the area.

These original historical floodgates were built in 1930 with steel from Carnegie Steel Company, the site is listed on the National Historic Registry. The gates are the largest of their type built in the United States and have a unique Swiss patented design, formally known as Huber & Lutz roof weir gates.

Meadowlake and its spillgates provide environmental impact with wildlife habitats, fishing habitats and tall bald cypress trees that line the banks of the river would all be severely impacted by loss of the lake.

The Hazard Mitigation of the MeadowLake spillgates at Nolte Dam manage the flood waters of the Guadalupe River, a river basin known for historical flood events. These 90+yr old gates pose risk to upstream stream flooding as some of the gates cannot currently lower to safely pass flood waters. If the spillgates catastrophically fail (which has already happened with one of the sister lakes upstream), this could potentially lead to further downstream flooding and severe consequences. In the current condition, the gates pose a major hazard risk and replacing the gates would lead to a substantial improvement in the resilience of the infrastructure insuring a Lake for future generations.

We respectfully submit that MeadowLake is an environmental treasure worth investing in for the future and appreciate consideration of grant funds.

If more room needed, use page 2

Name: Tim and Barbara Green
Organization/Business (if applicable):
Phone #: 713-598-6043
Email: bgreentx@prodigy.net



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

My name is Benna Hunter and I live in Seguin with my family of 4. We moved to Seguin in 2017 and bought a house that backed up to Meadow Lake, though it did not have water access at the time. Eventually, the undeveloped lot connecting us to Meadow Lake went up for sale and we spent every last dollar to purchase it. Knowing that we only get 18 summers with our children motivated us to work towards this goal to spend summers on the lake and hopefully create lasting traditions that bring them back home.

Now Meadow Lake is in danger of disappearing forever as the hydroelectric dams are nearing 100 years old with current owners neglecting to fix it. This means Seguin's community lake will potentially be drained forever, unless our community figures out an affordable solution for repairing the spill gates. Aside from the ecological impact, we have to consider the economic impact on the homeowners and Seguin's tax base, as well.

We are blessed to have an amazing team of people at the Meadow Lake-Nolte Dam Association (MLNDA) who are all homeowners donating their free time discover a solution. We are 100% community funded up to this point and have community leaders, brilliant engineers, and hydroelectric operators ready to join our cause. When a development program like CDGB-MIT comes along, it could potentially be a huge piece of the solution.

Looking at the fund distribution, I noticed communities with under 1,000 residents receive the same funds as a community with 30,000 residents. Please reconsider the distribution based off of population as the funds will impact may more families.

Thank you,
Benna

If more room needed, use page 2

Name: Benna Hunter

Organization/Business (if applicable):

Phone #: 270-860-2246

Email: bennahunter@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

As I'm sure you are aware, the GBRA and State of Texas decision to not properly maintain repair and replace the Guadalupe Dams has and may continue to cause great harm to the economic and environmental stability of Central Texas. The City of Seguin, recreational visitors, businesses, and home and property owners along Meadow lake are adversely affected. The property owners along Meadow Lake do not have the financial resources available to cover 100% of the cost associated with the dam replacement. Most of us are local Seguin residents, not second home owners and weekenders from Houston. This being said it is evident from the recent WCID election that residents are willing to do what they can to help save Meadow Lake.

Support from the Texas Community Block Grant Regional Mitigation Program will go along way to help the residents of Meadow Lake cover the cost to replace our aging dam. I would only hope you might consider the size and population of Seguin (30,902) and the overall impact to Central Texas compared to the other smaller communities requesting these funds.

Thank you for your consideration.

Brad Jones
206 S Heideke Street
Seguin, TX 78155

If more room needed, use page 2

Name: Brad Jones

Organization/Business (if applicable):

Phone #: 210-417-0392

Email: brad@jmcassociates.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Please consider dividing the grant amount for AACOG communities to be divided up PER CAPITA, as Seguin is 4-10x the population of the other cities involved. It just makes sense that a much larger city of 30,000 could use more funds than one of 1900.

Also we would like to be sure repair of the spillgate of Meadow Lake remains a top priority and keeps moving forward.

Thank you.

If more room needed, use page 2

Name: Deanna Molinaro
Organization/Business (if applicable):
Phone #: 469-964-0144
Email: chickenshoot@gmail.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

As of September 2022, my wife and I purchased a home in Seguin, Texas located at 128 Wampum Way, 78155. We picked the city of Seguin as its a small town < 50,000 population but at 30,000 population its large enough to provide our family of five plenty of restaurants, activities (e.g. fairs) and attractions (downtown shops, museums, parks, wineries etc). Prior to owning a home in Seguin, we would come out for downtown attractions and restaurants.

For my family and the rest of the Seguin population, I am requesting that Seguin obtain a larger allocation of the \$14.9 million which is currently allocated evenly among the ten selected communities (\$1.4M per community). Based on the current allocation methodolgy, Seguin with a population of 30,000 (\$49.66 allocation per citizen) will receive the same \$ allocation as Hiltop with a population of 196 (\$7,600 allocation per citizen). Seguin's population is 10x larger, or more, than the majority of other nine communities that will be receiving an equal allocation.

The cost of flood control and drainage improvements, infrastructure improvements, and the other eligible grant activies will be significantly greater for a community of 30,000 than a community of 196.

I am requesting that AACOG consider revising the allocation formula for the \$14.9 million (50% of total grant) currently divided evenly among 10 communities to also include a per capita allocation. For example, only allocate 25% (vs 50%) of the total grant of \$29.8 million evenly among the 10 communities and allocate the other 25% on a per capita basis.

My family and I are grateful for the allocation and your consideration of my request above. please feel free to email me at noscari@outlook.com or callll at 210-857-0728

Nicolas Oscari

If more room needed, use page 2

Name: nicolas oscari
Organization/Business (if applicable):
Phone #: 2108570728
Email: noscari@outlook.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

My family and I purchased a home in Seguin, Texas located at 128 Wampum Way, 78155. We have been visiting Seguin for years, enjoying the small town charm, activities on the river, locally owned restaurants and shops and more. It was a dream of ours to finally purchase our own home on Meadow Lake. Our family of five now regularly enjoys fishing off the dock, kayaking on the river and patronizing all the attractions the city of Seguin has to offer.

For my family and the rest of the Seguin population, I am requesting that Seguin obtain a larger allocation of the \$14.9 million which is currently allocated evenly among the ten selected communities (\$1.4M per community). Based on the current allocation methodology, Seguin with a population of 30,000 (\$49.66 allocation per citizen) will receive the same \$ allocation as Hiltop with a population of 196 (\$7,600 allocation per citizen). Seguin's population is 10x larger, or more, than the majority of other nine communities that will be receiving an equal allocation.

As we have seen with many of the surrounding lakes, the Meadow Lake spill gates are in imminent danger of failing. The failure of the spill gates would have devastating impact on the community, including flooding, tourism and the livelihood of many citizens. The cost of flood control and drainage improvements, infrastructure improvements, and the other eligible grant activities will be significantly greater for a community of 30,000 than a community of 196.

I am requesting that AACOG consider revising the allocation formula for the \$14.9 million currently divided evenly among 10 communities to also include per capita considerations to more fairly allocate the funds for the benefit of all citizen impacted.

My family and I are grateful for the allocation and your consideration of my request above.

If more room needed, use page 2

Name: Victoria Oscari

Organization/Business (if applicable):

Phone #: 210-279-3842

Email: victoriaoscari@hotmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

I would like to thank AACOG and GLO for providing a way in which citizens can participate and have their voices heard. The Texas Community Development Block Grant Mitigation Program (CDBG-MIT) has the potential to support funding to needed projects in our local community. I along with many members of the local community have worked closely with city and county officials over the past 3 years to see our project come to fruition. The project would replace the outdated spill gates at Nolte Dam leading to the preservation of Meadow Lake, a recreational and economic driver for the city historically. Unfortunately, the Guadalupe Blanco River Authority, a Texas State agency, does not have the funding available to maintain the gates and responsibility for funding has falling to the local community. With the City's low socio-economic make-up this is a tremendous burden to the community and something unexpected due to the long history of the River Authority maintaining the gates. The grant program could provide a path way to fix this governmental lapse in funding.

I attended AACOG's Method of Distribution meeting in Marion on November 9, 2022. The method proposed a 50% split in funding between eligible counties and eligible LMI cities. The counties funding portion weigh both population and LMI while the cities funding portion are evenly distributed among the eligible cities. The distribution of the cities funding seems to follow no objectively or verifiable calculation only a completely even distribution with no factors weighted. This seems unique as I also attended the Golden Crescent Regional Planning Method of Distribution a month prior and for both cities and counties, population was a weighted factor. I cannot find a method of distribution from any regional council of governments in which a completely even distribution is made without weighing any factors. While low to moderate income (LMI) is an important factor without considering population it provides little context. For example, City of Seguin with a population of 30,902 and LMI of 53.76% is receiving the same amount as Marion with a population of 1,044 and LMI of 51.43%. Meaning City of Seguin has 16,612 (30,902 x 53.76%) LMI households and Marion has 537 (1,044 x 51.43%) LMI households. This means City of Seguin is receiving 31 times less then City of Marion per LMI household. My question to AACOG and GLO is why a low to moderate household in Seguin provided so much less than a low to moderate household in Marion? Geographical location or politics can have no part in the distribution of funds. A fair distribution has to include a per capita basis and population must be considered as one of the factors. The grant program's own guidelines describe these factors.



If more room needed, use page 2

Name: Jacy Robbins
Organization/Business (if applicable):
Phone #: 281-702-7435
Email: jrobbins2005@gmail.com

If, the grant program does aim to target the most in need and vulnerable communities then I would also recommend a different split between counties and LMI cities funding portions. Large majority of the eligible counties have a LMI below 50% while all cities have a LMI above 50%. Cities, especially with low socio-economic make-ups, inherently have more infrastructure needs. Therefore, a larger portion of the funding should go to LMI cities as a whole.



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

I am a citizen of the city of Seguin and live on Meadow Lake. I was made aware that AACOG is allocating funding from GLO for flood midigation. With the city's large population and low socioeconomic status the distribution of funds should fairly account for this. We are requesting that more funds be distributed to the city so that the much needed projects can be completed. The lake has been an important historical and economic resource for the city and funding resource through tax revenues for the school district. We love this lake and would love your help to preserve it.

If more room needed, use page 2

Name: Tammie Robbins
Organization/Business (if applicable):
Phone #: 210-385-8073
Email: trobbins722@aol.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

My husband and I own property on Meadow Lake in Seguin. We are members of the Meadow Lake Nolte Dam Association (MLNDA) and support that organization's efforts to find a solution to replace Nolte Dam's deteriorating spillgates and save the lake. We are hopeful some of the funds from the CDBG-MIT allocated to Seguin would be used in this effort since Meadow Lake is such an important economic, social, recreational and environmental part of the Seguin Community, as well as aiding in flood mitigation along the Guadalupe River. MLNDA has initiated a plan to replace the spillgates, but the project needs funding. We just voted in creating a WCID (90.6% support) which would pay for the replacement by taxing property owners adjacent to lake. The tax rate will not pass in next year's election though if we cannot get it low enough (with supplemental funds) to make sense for property owners on the lake. If the WCID rate does not pass, the district will be dissolved and Meadow Lake will be drained. GBRA has already made it clear that this is their intention if MLNDA cannot show them that the spillgate replacement can be funded. It would be a shame for Seguin to lose such an important resource.

I attended the Method of Distribution (MOD) meeting last week and reviewed the PowerPoint presented. I do not understand why the AACOG has designated that half of the grant amount be divided up evenly (\$1.494M each) instead of based on population. Seguin has many times more people in its community than any of the others, more people than all of the other communities combined. I feel like the AACOG should re-visit this MOD and find a more equitable way to divide up this portion of the funds. Even if you decided on a minimum amount each community should receive, then based the remainder on per capita division, that would be a much fairer than the current MOD.

Thank you for your time.

If more room needed, use page 2

Name: Christy Sellers
Organization/Business (if applicable): n/a
Phone #: 832-656-0520
Email: crsty68@yahoo.com



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may email completed forms to info@aacog.com by 12:00pm on November 21st, 2022.

COMMUNITY IMPACTED: CITY OF SEGUIN

Hello,

I'm writing to ask for the Texas Community Block Grant from AACOG to be distributed differently. As someone born and raised in Seguin this grant would mean a lot, especially for the Meadow Lake/ Nolte Dam. I have seen many floods in Seguin and when it rains/floods all the water in Seguin flows into Meadow Lake. We need a working dam in order to lower the gates during these flood events. The lake and surrounding area is also important to bring tourism to Seguin.

The distribution of money should be based on the population of the low socioeconomic cities, not split evenly as proposed. Seguin has 23,265 more residents than the second largest city. It is unfair to think that each citizen in Seguin is worth less than all the citizens in the other cities. I know there is a minimum amount to be given per city and this could be met if the city/county split is 70% for cities, 30% for counties.

I hope that the people get represented fairly and thank you for your consideration.

If more room needed, use page 2

Name: Michelle Smith
Organization/Business (if applicable):
Phone #: 830-481-7803
Email: michellems92@yahoo.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

I am writing to express my concern about the spillgate of Mead Lake, which I hope remains a big priority and is moving forward.

More importantly I think the AACOG communities should be allotted the CDBG-MIT grant funds based on their population. I find it unreasonable for a community of 1700 to receive the same amount as Seguin with a population of 30,000. It isn't a practical or logical division of funds, and I hope you will reconsider.

Thank you.

If more room needed, use page 2

Name: Aaron Thedford
Organization/Business (if applicable):
Phone #: 972-567-8195
Email: arthedford@gmail.com

Eilen Thedford
898 Buerger Lane
Seguin, TX 78155
817-368-4637
eilen@paintingsbyeilen.com

Alamo Area Council of Governments
Block Grant Regional Mitigation Program

To Members of the committee,

As a property owner on Meadow Lake in Seguin, I recognize the impact these grants will have on our communities. Meadow Lake is a valuable asset in the community of Seguin. It generates millions of tax dollars for our schools, tourism, and serves to protect the ecology of this area...We have already seen the outcome when one of the area lakes is drained, and the protection the dam provides in flood events can not be minimized. In its current condition it will fail, and countless acres of land will be washed down to the coast.

The current plan is to distribute these funds on an equal basis to ten communities on an equal basis. The residents of Seguin will receive the very same amount of funding as Hilltop , population 196 and Marion, population 1,044. At first glance it looks to be a good plan, but on further evaluation, one can realize that larger communities have larger needs, and it would be more equitable if funds were distributed on a per capita basis.

Increasing the funding for Seguin would replace the spillgates to Nolte dam and would benefit everyone downstream. A new and functional spill gate would save lives in a flood event, and prevent immeasurable loss of property and life. The Meadow Lake Nolte Dam Association has initiated a pragmatic and actionalble plan to replace the spillgates at Nolte Dam, a plan the has been supported by the city and community..the plan includes future continuation of hydroelectric power, an important green energy source. There is no way to estimate the value of these improvements.

In determining the disbursement of funds, please consider providing funding on a per capital basis...returning the funds to the taxpayers equally makes more sense, and would provide benefits to many other communities.

Thank you for your consideration.

Sincerely,

Eilen Thedford

Eilen Thedford



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

My wife and I own property on Meadow Lake in Seguin. We are members of the Meadow Lake Nolte Dam Association (MLNDA) and support that organization's efforts to find a solution to replace Nolte Dam's deteriorating spillgates and save the lake. We are hopeful some of the funds from the CDBG-MIT allocated to Seguin would be used in this effort since Meadow Lake is such an important economic, social, recreational and environmental part of the Seguin Community, as well as aiding in flood mitigation along the Guadalupe River. MLNDA has initiated a plan to replace the spillgates, but the project needs funding. We just voted in creating a WCID (90.6% support) which would pay for the replacement by taxing property owners adjacent to lake. The tax rate will not pass in next year's election though if we cannot get it low enough (with supplemental funds) to make sense for property owners on the lake. If the WCID rate does not pass, the district will be dissolved and Meadow Lake will be drained. GBRA has already made it clear that this is their intention if MLNDA cannot show them that the spillgate replacement can be funded. It would be a shame for Seguin to lose such an important resource.

I do not understand why the AACOG has designated that half of the grant amount be divided up evenly (\$1.494M each) instead of based on population. Seguin has many times more people in its community than any of the others, more people than all of the other communities combined. I feel like the AACOG should re-visit this MOD and find a more equitable way to divide up this portion of the funds. Even if you decided on a minimum amount each community should receive, then based the remainder on per capita division, that would be a much fairer than the current MOD.

Thank you for your time.

If more room needed, use page 2

Name: travis vickery
Organization/Business (if applicable):
Phone #: 512-495-6068
Email: tevickery@gmail.com



PUBLIC COMMENT FORM

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COMMUNITY IMPACTED: CITY OF SEGUIN

Please consider allocation a larger portion to Seguin and Meadow Lake. The cost of the dam repair is significant, and without additional funding the work may not be done. This would result in the city of Seguin losing important property tax revenue, which is needed to continue development. As a homeowner on Meadow Lane, we are committed to supporting the lake with increased taxes for a water district and personal financial donations, but we need additional help and request that CDBG-MIT funds be allocated to Meadow Lake/Seguin at a higher level to reflect the per capita impact that it will have on this population. Thank you for your consideration.

If more room needed, use page 2

Name: Cathleen Wenger

Organization/Business (if applicable):

Phone #: (512)694-0109



PUBLIC COMMENT FORM

Please use the space below to give us your thoughts on the Texas Community Development Block Grant Regional Mitigation Program (CDBG-MIT) funds. You may leave the completed form with AACOG staff or mail to AACOG Public Affairs - CDBG-MIT Comments, 2700 NE Loop 410, Suite 101 San Antonio, TX 78217 by November 21st, 2022.

I am representing the City of Seguin at today's public meeting. The City of Seguin was impacted by the 2015 floods and Hurricane Harvey. We have an LMI of 53.76% and a growing population of 30,902 residents. The Method of Allocation being proposed by AACOG for the seven impacted cities, identified as Group A, is simply dividing the proposed allocation by seven. AACOG is proposing an allocation of \$2,134,857.14 for each of the seven cities listed in Group A. This does not take into account population. The methodology used for the Group B, counties, uses population as a factor in determining funding allocations. The methodology used by AACOG is not consistent for Group A and Group B.

The City of Seguin is the largest city listed in Group A. In fact, we are 300% bigger than the next largest city of 7,637 residents. We believe that our size and overall greater proportion of LMI residents warrants an allocation method that reflects our community.

We are proposing that AACOG use the total amount of \$14,943,999.98 and divide this number by the total population of all seven cities. \$14.9M divided by a total population of 51,793 is \$288.53 per person. The amount per person should be multiplied by each city's population. Any City less than the \$900,000 floor should be brought up to \$900,000. Under this method, Seguin would accurately reflect 30,902 residents x \$288.53 or roughly \$8.9M. We are proposing that the difference between the floor amount and the actual calculation for any ^{city} less than \$900,000 be subtracted from the amount that will be allocated to Seguin with the final allocation for our city closer to \$7.6M

It is only fair that all communities receive funding that reflects their population and needs.

Kathy Wood	Kathy J. Wood
City of Seguin	
11/9/22	

RESPONSE: Thank you for your comments regarding the proposed AACOG Region Mitigation Method of Distribution (MOD), as presented at the November 9, 2022 public hearing held in Marion, Texas. Understanding the general concern over distributing \$14.9M evenly among seven cities, regardless of population, the intention was to prioritize Low-to-Moderate Income (LMI). Small communities typically do not have the population or tax base to support much needed infrastructure maintenance, repairs and replacement projects in their municipalities. AACOG sought to provide a funding resource to smaller communities with LMI percentages over 51% so that historically underserved areas had funding to complete infrastructure projects. Seguin receives a lower allocation per LMI household than Marion because there are more households in Seguin and the split is even across the board.