



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

December 21, 2022

Michael Parks, Executive Director
Brazos Valley Council of Governments
P.O. Box 4128
Bryan, Texas 77805

Re: Brazos Valley Council of Governments (BVCOG) CDBG-MIT Regional Mitigation Program
Method of Distribution (MOD) Approval

Mr. Parks:

The Texas General Land Office (GLO) Community Development and Revitalization division (GLO-CDR) is approving the BVCOG Mitigation Method of Distribution (MOD). The MOD delivered to the GLO was initially submitted November 18, 2022, underwent review by GLO staff, and was submitted a final time with corrections made on December 21, 2022.

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,

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

RESOLUTION
BVCOG Method of Distribution for Regional Mitigation Program

WHEREAS, the Brazos Valley Council of Governments, a regional planning commission organized under provisions of Chapter 570, Acts, 59th Legislature, Regular Session 1965 (codified as Article 1011 m, V.T.C.S.), is given area wide planning responsibility for Brazos, Burleson, Grimes, Leon, Madison, Robertson, and Washington counties; and

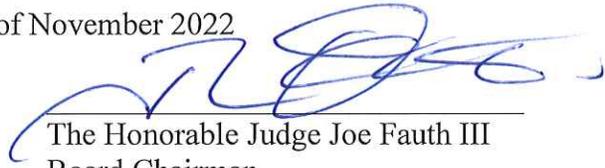
WHEREAS, the General Land Office (GLO) has required development of a Method of Distribution for the Regional Mitigation Program, also known as the Community Development Block Grant-Mitigation Method of Distribution (CDBG-MIT MOD).

WHEREAS, the Brazos Valley Council of Governments finds it in the best interest of the citizens of the Brazos Valley that the BVCOG Method of Distribution be approved to allocate funds to the region's municipalities for the funding of mitigation projects; and

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE BRAZOS VALLEY COUNCIL OF GOVERNMENTS:

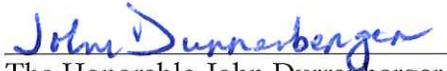
1. That the BVCOG MOD provides an allocation plan for the \$25,041,000.00 that was provided to the Brazos Valley region for mitigation projects;
2. That the BVCOG MOD meets the requirements issued by the General Land Office for inclusion in the State Mitigation Action Plan, as amended;
3. That this Resolution is effective upon its adoption.

PASSED AND APPROVED this is the 9th day of November 2022



The Honorable Judge Joe Fauth III
Board Chairman

ATTEST:



The Honorable John Durrenberger
Board Secretary



Council of Governments: Brazos Valley Council of Governments

HUD MID and State MID Allocations

HUD MID Total	N/A
State MID Total	\$25,041,000
Grand Total COG Allocation	\$25,041,000

Table 1

Funding Limits

<i>Minimum Amount</i> Waiver Requested	Yes	
Minimum Amount	\$500,000	
Maximum Amount	N/A	

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.

Many of the entities in our area have mitigation-related projects that they have identified. The method of distribution we have developed utilizes multiple data sets that offer a different perspective on the realities of our region. LMI and SoVi heavily factor in the portion of our population that would be most affected by a future natural disaster. Population ensures that we are still working to affect the most amount of people possible, while not over weighing that data point as to neglect our more rural, low-population areas. FEMA IA (RP) factors in the losses associated with damage of past hazards for the purpose of targeting areas that have experienced previous losses that could potentially be mitigated. With these data selections and justifications, we believe we are enabling our jurisdictions to complete projects that reduce risk, foster long-term resiliency, and fortify affected and distressed areas.

In addition, we have chosen to reserve the first \$10,729,000 for our 4 presidentially declared counties (Madison, Grimes, Washington, and Burleson) from Hurricane Harvey, as was originally intended by the original State Action Plan. The remaining \$14,312,000 will be made available to all 7 of our counties, with each of the entities in the other 3 counties (Brazos, Robertson, and Leon) receiving at least \$500,000 minimum to ensure a regionwide approach.

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%	HUD and Surveys	Supports efforts to meet LMI requirements from HUD. Supports efforts to serve most vulnerable, underserved populations.
Population	12.5%	2019 5-Yr American Survey from the U.S. Census Bureau from the GLO	Included to balance serving the most people possible while not overemphasizing this metric as to only serve our higher population areas. Todd Mission and Midway numbers are from citywide surveys.
FEMA IA (RP)	12.5%	FEMA	These datasets represent FEMA IA Non- PII applicant data at the place, census block, and American Indian Area geographies for declared disasters in Texas between 2002 and 2019. This data was directly requested from FEMA.
Social Vulnerability	25%	CDBG-MIT AP Analysis	Adds another metric for quantifying the vulnerability of a community, especially as it relates to its ability to withstand future disasters/hazards.

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

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:

<input checked="" type="checkbox"/>	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"/> Communications infrastructure <input type="checkbox"/> Provision of generators
<input type="checkbox"/>	Natural or green infrastructure	<input type="checkbox"/> Removal of debris
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/> Streets or bridges
<input type="checkbox"/>	Economic development (assistance to businesses for the installation of disaster 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"/> Other infrastructure improvements
		<input type="checkbox"/> Public Services (<i>within the 15% cap</i>)
		<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.

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.

Our strategic plan to meet the LMI national objective begins with our data selections and weights. LMI % is weighted at 50% in the allocation worksheet. SoVi is weighted at 25% in the allocation worksheet. This means that three-fourths of the allocation are focused on serving the economically distressed populations in our region. After the allocation has taken place, our regional partners have been well-informed about the intentions and purpose of this money and have already focused their attention on identifying projects that will have the best opportunity of meeting our regional threshold.

The LMI percentages in the “Allocation Summary” of our Preliminary Allocation spreadsheet were chosen to best give our jurisdictions the opportunity to hit the thresholds while maintaining the national objective. We are asking our jurisdictions with over 51% LMI to dedicate 100% of their funds to LMI projects, our jurisdictions with between 45% and 51% LMI to dedicate 50% of their funds to LMI projects, and our jurisdictions with between 40% and 45% LMI to dedicate 33% of their funds to LMI projects.

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):	January 19 th , 2022 @ 12:00 PM	October 14 th & November 4 th , 2022 @ 12:00 PM
Location(s):	BVCOG Board Room	BVCOG Board Room
Total Attendance:	20	60 / 30

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 Date(s) Sent	MOD Public Hearing Date(s) Sent
<input checked="" type="checkbox"/>	Email	January 12 th , 2022	October 7 th & October 28 th , 2022
<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)	January 14 th , 2022	October 5 th & October 27 th , 2022

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
The Eagle	1/12-1/19/2022	10/5-10/11/22 & 10/27-1/2/22
Madisonville Meteor	1/12/2022	10/5 & 10/12 & 11/2/22
Navasota Examiner	1/12/2022	11/2/2022
Burleson Cty. Tri.		10/6/2022 & 10/12/22

Table 13

Public Comment Period

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

Start Date:	10/14/2022	End Date:	11/7/2022	No. of Days:	21 days
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Table 14

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.

BVCOG sent detailed email invitations 7 days before the hearing and followed up with secondary notifications on at least one other occasion for all invited parties. BVCOG directly contacted the community service-oriented organizations by phone to ensure they knew what was taking place, when it was taking place, and how they could participate in the process. BVCOG received calls from community members and answered questions in detail to ensure any concern they had was accounted for. BVCOG maintained a virtual option to ensure travel barriers were not a factor.

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).

Notices for the public hearings was sent out to local media outlets, social media and public service announcements that reached residents who have Limited English Proficiency and disabilities such as auditory and visual impairments that may hamper their receipt of the notices in other ways.

BVCOG provided reasonable accommodations for persons attending the public hearings. Requests from persons needing special accommodations could have been received by BVCOG staff 48 hours prior to a meeting. The public hearing was conducted in English and requests for language interpreters or other special communication could have been made at least 48 hours prior to the 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:	Cagan Baldree
Title:	Public Safety Planning Manager

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.


Signature

11-18-22
Date

Michael Parks
Printed Name

Exec. Dir
Title

mparks@bvcog.org
Email Address

979-595-2800
Telephone Number

COG:	Brazos Valley							Brazos Valley				
Total Allocation:	\$ 10,729,000.00							\$ 25,041,000.00				
City or County	First Distribution Factor: LMI %				Second Distribution Factor: Population				Third Distribution Factor: FEMA IA			
	Maximum Factor		61.31%		Maximum Factor Measure:		35,163.00		Maximum Factor		418	
	Factor Weight:		50.0		Factor Weight:		12.5		Factor Weight:		12.5	
	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)
Burleson County	37.83%	61.31%	50.00	30.85	18,058	35,163	12.5	6.42	418	418	12.5	12.50
Caldwell	38.37%	61.31%	50.00	31.29	4,315	35,163	12.5	1.53	3	418	12.5	0.09
Snook	47.92%	61.31%	50.00	39.08	495	35,163	12.5	0.18	5	418	12.5	0.15
Somerville	43.56%	61.31%	50.00	35.52	1,473	35,163	12.5	0.52	52	418	12.5	1.56
Grimes County	42.40%	61.31%	50.00	34.58	27,984	35,163	12.5	9.95	233	418	12.5	6.97
Anderson	28.00%	61.31%	50.00	22.83	256	35,163	12.5	0.09	4	418	12.5	0.12
Iola	29.90%	61.31%	50.00	24.38	209	35,163	12.5	0.07	10	418	12.5	0.30
Bedias	56.45%	61.31%	50.00	46.04	374	35,163	12.5	0.13	23	418	12.5	0.69
Navasota	44.91%	61.31%	50.00	36.63	7,565	35,163	12.5	2.69	173	418	12.5	5.17
Plantersville	0.00%	61.31%	50.00	0.00	431	35,163	12.5	0.15	40	418	12.5	1.20
Todd Mission	61.31%	61.31%	50.00	50.00	121	35,163	12.5	0.04	13	418	12.5	0.39
Madison County	44.03%	61.31%	50.00	35.91	14,197	35,163	12.5	5.05	315	418	12.5	9.42
Madisonville	53.56%	61.31%	50.00	43.68	4,653	35,163	12.5	1.65	61	418	12.5	1.82
Midway	52.74%	61.31%	50.00	43.01	228	35,163	12.5	0.08	8	418	12.5	0.24
Washington County	43.57%	61.31%	50.00	35.53	35,163	35,163	12.5	12.50	209	418	12.5	6.25
Brenham	46.50%	61.31%	50.00	37.92	17,123	35,163	12.5	6.09	143	418	12.5	4.28
Burton	24.05%	61.31%	50.00	19.61	387	35,163	12.5	0.14	5	418	12.5	0.15

Fourth Distribution Factor: SoVi				Entity Weighted Factor Total (EWFtot)	Proportional Weighted Factor (PWF) EWFtot/WFtot	Proportional Distribution PWF X AFD	Floor (FL)	Final Allocation	Final Allocation
Maximum Factor Measure:		5							
Factor Weight:		25.0							
Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)						
3	5	25.0	15	64.77	0.07	\$ 746,870.51	\$ -	\$ 746,870.51	\$ 746,900.00
4	5	25.0	20	52.92	0.06	\$ 610,166.60	\$ -	\$ 610,166.60	\$ 610,200.00
3	5	25.0	15	54.41	0.06	\$ 627,349.32	\$ -	\$ 627,349.32	\$ 627,300.00
5	5	25.0	25	62.60	0.07	\$ 721,874.13	\$ -	\$ 721,874.13	\$ 721,900.00
2	5	25.0	10	61.49	0.07	\$ 709,086.17	\$ -	\$ 709,086.17	\$ 709,100.00
4	5	25.0	20	43.05	0.05	\$ 496,355.40	\$ -	\$ 496,355.40	\$ 496,400.00
3	5	25.0	15	39.76	0.04	\$ 458,444.10	\$ -	\$ 458,444.10	\$ 458,400.00
5	5	25.0	25	71.86	0.08	\$ 828,584.61	\$ -	\$ 828,584.61	\$ 828,600.00
3	5	25.0	15	59.49	0.06	\$ 685,955.28	\$ -	\$ 685,955.28	\$ 686,000.00
0	5	25.0	0	1.35	0.00	\$ 15,559.75	\$ -	\$ 15,559.75	\$ 15,600.00
5	5	25.0	25	75.43	0.08	\$ 869,801.89	\$ -	\$ 869,801.89	\$ 869,800.00
1	5	25.0	5	55.37	0.06	\$ 638,520.75	\$ -	\$ 638,520.75	\$ 638,500.00
3	5	25.0	15	62.16	0.07	\$ 716,741.29	\$ -	\$ 716,741.29	\$ 716,700.00
3	5	25.0	15	58.33	0.06	\$ 672,615.79	\$ -	\$ 672,615.79	\$ 672,600.00
3	5	25.0	15	69.28	0.07	\$ 798,895.26	\$ -	\$ 798,895.26	\$ 798,900.00
3	5	25.0	15	63.29	0.07	\$ 729,741.94	\$ -	\$ 729,741.94	\$ 729,700.00
3	5	25.0	15	34.90	0.04	\$ 402,437.21	\$ -	\$ 402,437.21	\$ 402,400.00
Weighted Factor Total:				930.45	1.00	\$ 10,729,000.00	\$ -	\$ 10,729,000.00	\$ 10,729,000.00

COG:	Brazos Valley				Brazos Valley							
Total Allocation:	\$ 14,312,000.00				\$ 25,041,000.00							
City or County	First Distribution Factor: LMI %				Second Distribution Factor: Population				Third Distribution Factor: FEMA IA			
	Maximum Factor			73.85%	Maximum Factor Measure:			222,981.00	Maximum Factor			418
	Factor Weight:			50.0	Factor Weight:			12.5	Factor Weight:			12.5
	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)
Burleson County	37.83%	73.85%	50.00	25.61	18,058	222,981	12.5	1.01	418	418	12.5	12.50
Caldwell	38.37%	73.85%	50.00	25.98	4,315	222,981	12.5	0.24	3	418	12.5	0.09
Snook	47.92%	73.85%	50.00	32.44	495	222,981	12.5	0.03	5	418	12.5	0.15
Somerville	43.56%	73.85%	50.00	29.49	1,473	222,981	12.5	0.08	52	418	12.5	1.56
Grimes County	42.40%	73.85%	50.00	28.71	27,984	222,981	12.5	1.57	233	418	12.5	6.97
Anderson	28.00%	73.85%	50.00	18.96	256	222,981	12.5	0.01	4	418	12.5	0.12
Iola	29.90%	73.85%	50.00	20.24	209	222,981	12.5	0.01	10	418	12.5	0.30
Bedias	56.45%	73.85%	50.00	38.22	374	222,981	12.5	0.02	23	418	12.5	0.69
Navasota	44.91%	73.85%	50.00	30.41	7,565	222,981	12.5	0.42	173	418	12.5	5.17
Plantersville	0.00%	73.85%	50.00	0.00	431	222,981	12.5	0.02	40	418	12.5	1.20
Todd Mission	61.31%	73.85%	50.00	41.51	121	222,981	12.5	0.01	13	418	12.5	0.39
Madison County	44.03%	73.85%	50.00	29.81	14,197	222,981	12.5	0.80	315	418	12.5	9.42
Madisonville	53.56%	73.85%	50.00	36.26	4,653	222,981	12.5	0.26	61	418	12.5	1.82
Midway	52.74%	73.85%	50.00	35.71	228	222,981	12.5	0.01	8	418	12.5	0.24
Washington County	43.57%	73.85%	50.00	29.50	35,163	222,981	12.5	1.97	209	418	12.5	6.25
Brenham	46.50%	73.85%	50.00	31.48	17,123	222,981	12.5	0.96	143	418	12.5	4.28
Burton	24.05%	73.85%	50.00	16.28	387	222,981	12.5	0.02	5	418	12.5	0.15
Brazos County	51.05%	73.85%	50.00	34.56	222,981	222,981	12.5	12.50	188	418	12.5	5.62
Bryan	51.76%	73.85%	50.00	35.04	84,096	222,981	12.5	4.71	173	418	12.5	5.17
College Station	56.00%	73.85%	50.00	37.91	113,686	222,981	12.5	6.37	7	418	12.5	0.21
Wixon Valley	5.88%	73.85%	50.00	3.98	213	222,981	12.5	0.01	0	418	12.5	0.00
Kurten	38.24%	73.85%	50.00	25.89	373	222,981	12.5	0.02	2	418	12.5	0.06
Robertson County	41.93%	73.85%	50.00	28.39	17,225	222,981	12.5	0.97	0	418	12.5	0.00
Bremond	53.04%	73.85%	50.00	35.91	911	222,981	12.5	0.05	0	418	12.5	0.00
Calvert	73.85%	73.85%	50.00	50.00	1,328	222,981	12.5	0.07	0	418	12.5	0.00
Franklin	52.97%	73.85%	50.00	35.86	1,989	222,981	12.5	0.11	0	418	12.5	0.00
Hearne	44.42%	73.85%	50.00	30.07	4,433	222,981	12.5	0.25	0	418	12.5	0.00
Leon County	38.90%	73.85%	50.00	26.34	16,990	222,981	12.5	0.95	0	418	12.5	0.00
Centerville	46.37%	73.85%	50.00	31.39	1,029	222,981	12.5	0.06	0	418	12.5	0.00
Jewett	52.31%	73.85%	50.00	35.42	994	222,981	12.5	0.06	0	418	12.5	0.00
Leona	30.30%	73.85%	50.00	20.51	182	222,981	12.5	0.01	0	418	12.5	0.00
Marquez	41.07%	73.85%	50.00	27.81	265	222,981	12.5	0.01	0	418	12.5	0.00
Normangee	60.00%	73.85%	50.00	40.62	586	222,981	12.5	0.03	0	418	12.5	0.00
Oakwood	40.78%	73.85%	50.00	27.61	787	222,981	12.5	0.04	0	418	12.5	0.00
Buffalo	59.19%	73.85%	50.00	40.07	1,917	222,981	12.5	0.11	0	418	12.5	0.00

Fourth Distribution Factor: SoVi				Entity Weighted Factor Total (EWFtot)	Proportional Weighted Factor (PWF) EWFtot/WFtot	Proportional Distribution PWF X AFD	Floor (FL)	Final Allocation	Final Allocation
Maximum Factor Measure:		5							
Factor Weight:		25.0							
Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)						
3	5	25.0	15	54.13	0.03	\$ 444,127.60	\$ -	\$ 329,442.80	\$ 329,400.00
4	5	25.0	20	46.31	0.03	\$ 380,000.18	\$ -	\$ 281,874.67	\$ 281,900.00
3	5	25.0	15	47.62	0.03	\$ 390,761.59	\$ -	\$ 289,857.22	\$ 289,900.00
5	5	25.0	25	56.13	0.03	\$ 460,577.98	\$ -	\$ 341,645.28	\$ 341,600.00
2	5	25.0	10	47.24	0.03	\$ 387,658.82	\$ -	\$ 287,555.66	\$ 287,600.00
4	5	25.0	20	39.09	0.02	\$ 320,767.12	\$ -	\$ 237,937.07	\$ 238,000.00
3	5	25.0	15	35.55	0.02	\$ 291,745.46	\$ -	\$ 216,409.52	\$ 216,400.00
5	5	25.0	25	63.93	0.04	\$ 524,567.73	\$ -	\$ 389,111.28	\$ 389,100.00
3	5	25.0	15	51.00	0.03	\$ 418,515.69	\$ -	\$ 310,444.52	\$ 310,400.00
0	5	25.0	0	1.22	0.00	\$ 10,013.55	\$ 484,400.00	\$ 484,400.00	\$ 484,400.00
5	5	25.0	25	66.91	0.04	\$ 548,997.63	\$ -	\$ 407,232.77	\$ 407,200.00
1	5	25.0	5	45.03	0.03	\$ 369,465.90	\$ -	\$ 274,060.61	\$ 274,100.00
3	5	25.0	15	53.35	0.03	\$ 437,749.10	\$ -	\$ 324,711.39	\$ 324,700.00
3	5	25.0	15	50.96	0.03	\$ 418,152.79	\$ -	\$ 310,175.33	\$ 310,200.00
3	5	25.0	15	52.72	0.03	\$ 432,599.89	\$ -	\$ 320,891.83	\$ 320,900.00
3	5	25.0	15	51.72	0.03	\$ 424,384.21	\$ -	\$ 314,797.64	\$ 314,800.00
3	5	25.0	15	31.45	0.02	\$ 258,100.31	\$ -	\$ 191,452.39	\$ 191,400.00
3	5	25.0	15	67.69	0.04	\$ 555,397.63	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	59.93	0.03	\$ 491,775.15	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
2	5	25.0	10	54.50	0.03	\$ 447,180.61	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	18.99	0.01	\$ 155,848.55	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	40.97	0.02	\$ 336,191.35	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
4	5	25.0	20	49.35	0.03	\$ 404,980.40	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	60.96	0.03	\$ 500,226.44	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	65.07	0.04	\$ 533,973.93	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
4	5	25.0	20	55.97	0.03	\$ 459,305.49	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	45.32	0.03	\$ 371,901.61	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
4	5	25.0	20	47.29	0.03	\$ 388,038.90	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	56.45	0.03	\$ 463,225.03	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
4	5	25.0	20	55.47	0.03	\$ 455,181.12	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	45.52	0.03	\$ 373,557.31	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
3	5	25.0	15	42.82	0.02	\$ 351,373.18	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	65.66	0.04	\$ 538,743.75	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	52.65	0.03	\$ 432,058.04	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
5	5	25.0	25	65.18	0.04	\$ 534,855.98	\$ 500,000.00	\$ 500,000.00	\$ 500,000.00
Weighted Factor Total:				1744.18	1.00	\$ 14,312,000.00	\$ 9,484,400.00	\$ 14,312,000.00	\$ 14,312,000.00

COG: Brazos Valley					
Total Allocation:		\$25,041,000			
Entity	Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage	
Burleson County	\$ 1,076,300.00	4.30%	\$ -	0.00%	0.3783
Caldwell	\$ 892,100.00	3.56%	\$ -	0.00%	0.3837
Snook	\$ 917,200.00	3.66%	\$ 458,600.00	50.00%	0.4792
Somerville	\$ 1,063,500.00	4.25%	\$ 354,500.00	33.33%	0.4356
Grimes County	\$ 996,700.00	3.98%	\$ 332,233.33	33.33%	0.424
Anderson	\$ 734,400.00	2.93%	\$ -	0.00%	0.28
Iola	\$ 674,800.00	2.69%	\$ -	0.00%	0.299
Bedias	\$ 1,217,700.00	4.86%	\$ 1,217,700.00	100.00%	0.5645
Navasota	\$ 996,400.00	3.98%	\$ 332,133.33	33.33%	0.45
Plantersville	\$ 500,000.00	2.00%	\$ -	0.00%	0
Todd Mission	\$ 1,277,000.00	5.10%	\$ 1,277,000.00	100.00%	0.6131
Madison County	\$ 912,600.00	3.64%	\$ 304,200.00	33.33%	0.4403
Madisonville	\$ 1,041,400.00	4.16%	\$ 1,041,400.00	100.00%	0.5356
Midway	\$ 982,800.00	3.92%	\$ 982,800.00	100.00%	0.5274
Washington County	\$ 1,119,800.00	4.47%	\$ 373,266.67	33.33%	0.4357
Brenham	\$ 1,044,500.00	4.17%	\$ 522,250.00	50.00%	0.465
Burton	\$ 593,800.00	2.37%	\$ -	0.00%	0.2405
Brazos County	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5105
Bryan	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5176
College Station	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.56
Wixon Valley	\$ 500,000.00	2.00%	\$ -	0.00%	
Kurten	\$ 500,000.00	2.00%	\$ -	0.00%	0.3824
Robertson County	\$ 500,000.00	2.00%	\$ 166,666.67	33.33%	0.4193
Bremond	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5304
Calvert	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.7385
Franklin	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5297
Hearne	\$ 500,000.00	2.00%	\$ 166,666.67	33.33%	0.4442
Leon County	\$ 500,000.00	2.00%	\$ -	0.00%	0.389
Centerville	\$ 500,000.00	2.00%	\$ 250,000.00	50.00%	0.4637
Jewett	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5231
Leona	\$ 500,000.00	2.00%	\$ -	0.00%	0.303
Marquez	\$ 500,000.00	2.00%	\$ 166,666.67	33.33%	0.4107
Normangee	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.6
Oakwood	\$ 500,000.00	2.00%	\$ 166,666.67	33.33%	0.4078
Buffalo	\$ 500,000.00	2.00%	\$ 500,000.00	100.00%	0.5919
Total	\$ 25,041,000.00	100.00%	\$ 12,612,750.00	50.37%	

Notation of Updates to BVCOG MIT MOD

1. Public Comments have led to changes to the nature of the MOD. The changes include the portioning of the original \$10,729,000 for the original 4 counties and their cities that were Presidentially declared disaster areas during Harvey. These 4 counties were the only ones eligible in our region according to the State Action Plan. Action Plan Amendment 1 allowed for the inclusion of our other 3 counties, and we will include them. However, they will only be eligible to receive the increased amount along with the original 4 counties.

BRAZOS VALLEY COUNCIL OF GOVERNMENTS

PUBLIC HEARING

October 17th, 2022 @ 12:00 PM

BVCOG Board Room

I. Call to Order – Meeting called to order at 12:04 PM by Cagan Baldree and members present face to face and online introduced themselves.

II. Presentation – Mr. Cagan Baldree, Public Safety Planning Manager, gave a detailed presentation on the history of the CDBG-MIT funds, the current Method of Distribution for the Regional Mitigation Program, the specifics of our regional allocation, and the requirements sent forth for the distribution of the money and the utilization of it.

III. Questions Regarding Presentation

The Honorable Judge Fauth III of Grimes County asked a question about the nature of the redistribution of funds in the case a municipality declined the funds. Mr. Baldree answered the question by clarifying it will go back into the entire pool for redistribution across all municipalities. Judge Fauth asked a follow-up question about his previously submitted comments via email.

Commissioner Hanath of Washington County asked a question about the nature of submitting public comments. Commissioner Hanath points out that the original \$10,729,000 was for the original 4 counties and pointed out the need for COG Board approval. Commissioner Hanath offers up details about Washington County's proposed project and the position of the county regarding the distribution.

Mr. Baldree clarified the nature of the distribution as an addition to his presentation.

IV. Public Comments

The Honorable Judge Keith Schroeder submitted public comment on behalf of Burleson County. He contends that the original \$10,729,000 should be reserved for the 4 counties it was originally intended for. He pointed out that Burleson County did pursue the funding during the statewide competitions, and the percentage affected criteria prevented Burleson County and other counties from being qualified for the money at that time.

Judge Fauth III concurs with the sentiments shared by Judge Schroeder and Commissioner Hanath and submitted comment on behalf of Grimes County. He points out that he is in fact the Chairman of the Board of Directors for BVCOG and did so to point out that his comment could be received as a conflict of interest. However, he is obligated to pursue the best interests of his county while working with the region to find the best solution.

The Honorable Judge Clark Osborne concurs with the statements made by the other three individuals and submitted comment on behalf of Madison County.

Mr. Jimmy Carrigan, Emergency Manager of Leon County, asks a question clarifying the nature of LMI in the program. Subsequent discussion is had about the nature of LMI and the requirements that are historically associated with it across other funding streams.

All members in the meeting concurred that the LMI requirements should be reduced because of the constraining nature of the requirement.

Mr. Wesley Stolz, County Engineer for Washington County, submitted public comment to clarify the need in their county and the nature of the project they have designed. They are hoping to use the funding from this program for the project outlined in his comments.

Mr. Roger Sheridan, Deputy Director of BVCOG, requests that the jurisdictions be sure that they have a project to complete with the funding. He notes that in past programs, jurisdictions have accepted funds but have been unable to complete projects, resulting in a delayed redistribution that does not contribute to the projects on hand at the initial disbursement.

Ms. Michele Bailey-Meade asks a question about the nature of the LMI requirements in BVCOG's MOD by jurisdiction. Mr. Baldree responded with an explanation of who would have to spend money on LMI populations and how that breakdown was designed.

Commissioner Hanath contends that this is where one of the problems with the design of the program is found because it is difficult to verify the efficacy of projects prior to disbursement. Judge Schroeder points out the future challenges associated with LMI as the region continues to change.

Mr. Stolz adds additional comment about his disagreement about using LMI as a distribution factor because he believes it does not address the needs related to mitigation and past storm damages.

The Honorable Judge Byron Ryder of Leon County asks Washington County's representatives if they will be able to meet the LMI requirements and afford the project with the funding from this program. Washington County responds in the affirmative.

Judge Schroeder comments that there were two versions of this allocation, and the original version should be considered in this current iteration. Commissioner Hanath states that any money not used from the \$10,729,000 portion should be made available to the entire region.

Mr. Baldree concurred with and elaborated on the statement that Mr. Sheridan made regarding the need for the jurisdictions to aid BVCOG in providing clarity about who can effectively use the money.

Judge Ryder asked what it would take to give jurisdictions from the original 4 counties the amount needed to complete their project. Judge Schroeder offered information on Burleson County's potential project.

Mr. Carrigan asked about the nature of match funding for this program. Mr. Baldree clarified that there is none.

Mr. Bryan Ruemke asked if each of the jurisdictions included in the presented MOD have indicated they plan to accept the funding. Mr. Baldree answered yes.

Mr. Neal Wendele of Todd Mission commented that it is important for jurisdictions to be

sure they can complete a project. The Harvey MOD process was used as an example by him to elaborate on his point.

Ms. Lauren Powers of Marquez asked about the LMI requirements. Mr. Baldree responded.

Mr. Carrigan asked about the cities and counties sharing the funding. Mr. Baldree responded by bringing up the possibility of interlocal agreements.

V. Adjourn – Meeting adjourned at 1:16 PM

00:18:50 shelly.butts: ShellyButts

00:19:10 Matthew and Stacy Pritt-2: Matthew Pritt, GrantWorks, Inc.

00:19:14 lacy.schilling: Hard to hear with all the chewing

00:19:31 Kelle Odom: yes hard to hear

00:29:56 Gentry Woodard: Please forward presentation to:

00:30:06 Gentry Woodard: gentry@thegrantlabllc.com

00:51:03 shelly.butts: agreed!

BRAZOS VALLEY COUNCIL OF GOVERNMENTS

PUBLIC HEARING

November 4th, 2022 @ 12:00 PM

BVCOG Board Room

- I. **Call to Order** – Meeting called to order at 12:05 PM by Cagan Baldree and members present face to face and online introduced themselves.

- II. **Presentation** – Mr. Cagan Baldree, Public Safety Planning Manager, gave a detailed presentation on the history of the CDBG-MIT funds, the current Method of Distribution for the Regional Mitigation Program, the specifics of our regional allocation, and the requirements sent forth for the distribution of the money and the utilization of it. Mr. Baldree detailed the changes that were made to the MOD between the first public hearing and the second public hearing.

- III. **Questions Regarding Presentation**

Mr. David Lilly of Grimes County asked Mr. Baldree if the materials had been sent to the region. Mr. Baldree explained that all documents can be found on the landing page on the BVCOG website.

The Honorable Byron Ryder of Leon County asked about the nature of the Harvey-declared counties being included in the “second \$14 million”. Mr. Baldree explained that though the original \$10 million can easily be tied to Harvey-declared counties, the second \$14 million is tied to the entire region in terms of disaster mitigation.

- IV. **Public Comments**

No public comments were submitted.

- V. **Adjourn** – Meeting adjourned at 12:35 PM



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

December 13, 2021

Michael Parks, Executive Director
Brazos Valley Council of Governments
P.O. Drawer 4128
Bryan, Texas 77805

Re: Brazos Valley Council of Governments (BVCOG) CDBG-MIT Regional Mitigation
Program waiver request

Dear Mr. Parks:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has reviewed the request to include Brazos, Leon, and Robertson Counties in the BVCOG's Method of Distribution (MOD) for the Community Development Block Grant - Mitigation (CDBG-MIT) Regional Mitigation Program. These counties received federal disaster declarations due to the 2015 and 2016 floods and storms and are CDBG-MIT eligible. Contingent upon the approval of the State of Texas CDBG-MIT Action Plan Amendment 1 by the U.S. Department of Housing and Urban Development, we are pleased to inform you the waiver request is approved.

Thank you for your hard work to help the region recover from the many disasters which have recently beset it, as well as better prepare Texas for any future storms. If you have any questions or require additional information, please feel free to contact Margaret Adams at margaret.adams.glo@recovery.texas.gov.

Sincerely,

Alexandra Gamble

Alexandra Gamble, Policy Development Director
Community Development and Revitalization

Cc: Roger Sheridan, Brazos Valley Council of Governments Deputy Director
Shawn Strange, Policy Development Manager



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

October 21, 2022

Michael Parks, Executive Director
Brazos Valley Council of Governments
P.O. Drawer 4128
Bryan, Texas 77805

Re: Brazos Valley Council of Governments (BVCOG) CDBG-MIT Regional Mitigation Program
Preliminary Method of Distribution (MOD) – Version 3 Conditional Approval

Mr. Parks:

The Texas General Land Office (GLO) is conditionally approving the BVCOG Preliminary Mitigation Method of Distribution (MOD) – Version 3. The MOD was first submitted on March 2, 2022, underwent review by GLO staff and was submitted with corrections made on September 7, 2022. The GLO conditionally approved the BVCOG MOD – Version 1 on September 7, 2022, which was subsequently retracted by BVCOG to remove the unincorporated area of Millican on September 26, 2022. The GLO conditionally approved BVCOG MOD – Version 2 on September 27, 2022. BVCOG requested to retract the conditionally approved MOD - Version 2 on October 20, 2022 based on public input. BVCOG submitted the MOD - Version 3 on October 21, 2022. BVCOG MOD – Version 3 updates the allocation methodology.

With this conditional approval, the preliminary MOD may now be presented at a MOD Public Hearing and posted online for a minimum of 15 days for public comment. If you have any questions or require 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



To whom it may concern:

The Brazos Valley Council of Governments would like to officially submit a waiver to lower the minimum allocation requirements for our region to \$500,000. Being that we are a smaller, rural region, our distribution is different in nature than that of some of our more populated areas in the state of Texas. Dividing \$25,041,000 among 35 potentially eligible jurisdictions does not lend itself to allocations that reach the \$1,000,000 minimum threshold set forth by the requirements of the program. For that reason, we are requesting to lower threshold and ensure our jurisdictions get the funding they need to bolster the mitigation capabilities of their area.

Thank you,

Cagan Baldree

Public Safety Planning Manager
Brazos Valley Council of Governments



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

March 16, 2022

Michael Parks, Executive Director
Brazos Valley Council of Governments
P.O. Drawer 4128
Bryan, Texas 77805

Re: Brazos Valley Council of Governments (BVCOG) CDBG-MIT Regional Mitigation
Program waiver request

Dear Mr. Parks:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has reviewed the request to reduce the minimum allocation to entities in the BVCOG Method of Distribution (MOD) for the Community Development Block Grant - Mitigation (CDBG-MIT) Regional Mitigation Program from \$1,000,000 to \$500,000. Because the approval of this waiver will allow for additional communities to benefit from the CDBG-MIT funding, we are pleased to inform you the waiver request is approved.

Thank you for your hard work to help the region recover from the many disasters which have recently beset it, as well as better prepare Texas for any future storms. If you have any questions or require additional information, please feel free to contact Margaret Adams at margaret.adams.glo@recovery.texas.gov.

Sincerely,

Alexandra Gamble

Alexandra Gamble, Policy Development Director
Community Development and Revitalization

Cc: Roger Sheridan, Brazos Valley Council of Governments Deputy Director
Shawn Strange, Policy Development Manager



BRAZOS VALLEY COUNCIL OF GOVERNMENTS
P.O. DRAWER 4128 · BRYAN, TEXAS 77805-4128

August 17, 2021

TO: Texas General Land Office, George P. Bush, Commissioner

RE: Regional Mitigation Program Council of Government Method of Distribution

Brazos Valley Council of Governments requests a waiver to the eligibility requirement limiting allocations to counties that received a Hurricane Harvey presidential major disaster declaration (DR-4332) that the state has deemed State MID.

Being the third smallest region in the state, the Brazos Valley continues to thrive because our jurisdictions share resources and partners often throughout the seven counties. BVCOG requests inclusion in this MOD the counties that were also impacted by events in 2015 and 2016: Brazos, Leon and Robertson Counties.

Bobby R. Kazmir
Program Manager, Public Safety Planning
Brazos Valley Council of Governments

BRAZOS VALLEY COUNCIL OF GOVERNMENTS

PUBLIC PLANNING MEETING

January 19th, 2022 @ 12:00 PM

BVCOG Board Room

- I. Call to Order** – Meeting called to order at 12:02 PM by Cagan Baldree and members present face to face and online introduced themselves.

- II. Presentation** – Cagan Baldree, Public Safety Planning Manager, gave a detailed presentation on the history of the CDBG-MIT funds, the current Method of Distribution for the Regional Mitigation Program, the specifics of our regional allocation, and the requirements sent forth for the distribution of the money and the utilization of it.

- III. Questions Regarding Presentation** – No questions

- IV. Public Comments** – No public comments

- V. Adjourn** – Meeting adjourned at 12:36 PM

Notation of Updates to BVCOG MIT MOD

1. Public Comments have led to changes to the nature of the MOD. The changes include the portioning of the original \$10,729,000 for the original 4 counties and their cities that were Presidentially declared disaster areas during Harvey. These 4 counties were the only ones eligible in our region according to the State Action Plan. Action Plan Amendment 1 allowed for the inclusion of our other 3 counties, and we will include them. However, they will only be eligible to receive the increased amount along with the original 4 counties.

From: [Debbie Zan](#)
To: [Cagan Baldree](#)
Cc: [Rick Swick](#)
Subject: City of Bremond MIT-MOD Allocation
Date: Monday, October 31, 2022 4:32:29 PM
Attachments: [20221031163642826.pdf](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Cagan good afternoon.

The City of Bremond has researched two projects that fall within the prescribed projects. These two projects will consume our entire allocation of approximately \$829,000.00 dollars.

The City of Bremond due to our size and our available City taxable value we could never mitigate these needs without this funding. I hope we will be able to receive the amount described above.

Thanks for your consideration in this matter.

Ricky Swick
Mayor
(254)-252-0149

NOTE: Please find attached the signed acknowledge and accept funding.

Response to Mayor Ricky Swick of Bremond:

- BVCOG fully understands the city's need as it pertains to a specific project, but we do not have enough funds as a region to cover each project. In addition, the amended distribution makes this even more evident because of the allocation of funds to the 4 counties that were Presidentially declared disaster areas during Hurricane Harvey. We stand by our decision to prioritize the distribution of the first \$10,729,000 to those 4 counties. That leaves us with the task of providing the 3 counties included by waiver (which included Robertson) with the minimum of \$500,000. The distribution contains the proof of this necessary change.

From: [Joe Fauth](#)
To: [Cagan Baldree](#)
Subject: My Public Comment
Date: Wednesday, October 12, 2022 11:12:17 AM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is my Public comment with regard to the MOD of the \$25,041,000.00 from the CBDG-MIT funds.

I oppose the addition of adding the three additional counties as has been proposed. The original four counties, Grimes, Washington, Burleson and Madison were those counties initially designated to get the money and just because the allocation was increased, does not justify adding the 3 additional counties.

Please make this comment email a part of the Public Hearing Record.

Response to the Honorable Judge Fauth III of Grimes County:

- BVCOG has made changes according to this comment and others like it by sectioning off the original \$10,729,000 for the original 4 counties. We did maintain the eligibility of the other 3 counties for additional allocation, and we did so in order to maintain a regionwide impact from this funding. We hope the Board of Directors will accept the distribution as currently designed.

From: [Byron Ryder](#)
To: [Cagan Baldree](#)
Subject: Re: FINAL NOTICE - CDBG-MIT Method of Distribution Public Hearing
Date: Friday, October 14, 2022 1:57:56 PM
Attachments: [image001.png](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Judge Ryder:

I do believe we need to give the first 4 counties more to finish their project(s) they were trying to do but did not have enough money. I see their point but the other entities need money also for their projects. We are a region and need to work together to achieve things. The comment about 4 to 3 on the vote hit me wrong. We all need to work together on all projects.

Thanks

Byron Ryder
Leon County Judge
O:(903)536-2331
F:(903)536-7044

From: Cagan Baldree <Cagan.Baldree@bvcog.org>
Sent: Thursday, October 13, 2022 11:52:47 AM
To: Byron Ryder <bryder@co.leon.tx.us>
Subject: RE: FINAL NOTICE - CDBG-MIT Method of Distribution Public Hearing

Yes sir. It should be attached below my signature.

Cagan Baldree, MPSA
Public Safety Planning Manager



Brazos Valley Council of Governments
3991 East 29th Street
Bryan, TX 77802-4128
979-595-2801, Ext. 2028

[Visit the BVCOG Public Safety Planning Website for resources and events!](#)

From: Byron Ryder <bryder@co.leon.tx.us>
Sent: Thursday, October 13, 2022 11:19 AM
To: Cagan Baldree <Cagan.Baldree@bvcog.org>
Subject: RE: FINAL NOTICE - CDBG-MIT Method of Distribution Public Hearing

Response to the Honorable Judge Ryder:

- BVCOG has decided to reserve the initial \$10,729,000 for the initial 4 counties and get their funding allocations as close to the amount they need for their projects as possible, though they may not receive all the funding for a project.

Proposal for CDBG-MIT, MOD

All seven of the counties in the Brazos Valley are represented at this meeting.

CDBG funds have been distributed under DR (disaster recovery) for 2015-2016 Floods, 2017-2018 Floods and Hurricane Harvey. In order to have received funds under the CDBG-DR program, projects had to be tied to damages sustained during these events.

This particular program is not tied to a disaster and is not a competitive grant.

When the program was first proposed, 4 counties were to be involved and would be splitting 10 million dollars. With the addition of the 3 remaining counties in the Brazos Valley, an additional 14 million dollars was added to the total amount to be distributed. Even with the additional 14 million dollars, there are not enough dollars in the combined total to allow every entity to receive \$500,000.

In contemplating a plan to get the money disbursed equitably, I propose the following:

All parties who have agreed to participate in this funding need to be evaluated based on whether or not they received CDBG-DR under the listed disasters and the LMI of their specific entity.

Entities that did not receive DR funds and have an LMI of 100% would be in Tier 1

Entities that did not receive DR funds and have an LMI of less than 100% would be Tier 2

Entities that received DR funds and have an LMI of 100% would be in Tier 3

Entities that received DR funds and have an LMI of less than 100% would be in Tier 4

All entities should present projects for consideration in the program.

Entities in Tier 1 should see all projects funded 100%

Entities in Tier 2 should see projects funded based on LMI ($\%LMI \times \$500,000 = \text{amt. To be rec'd}$)

Entities in Tier 3 (LMI of 100% and received DR funding) \$500,000 - amt DR funds rec'd = \$ amt to be rec'd (If the amt of DR funding rec'd exceeds the \$500,000, ineligible for MIT funding)

Entities in Tier 4 (LMI of less than 100% and rec'd DR funding) \$500,000 - amt DR funds rec'd = \$\$\$ x %LMI = amt to be rec'd. (if the amt of DR funding rec'd exceeds the \$500,000, ineligible for MIT funding.)

If any of the ineligible entities are a county, every effort should be made to verify that any unincorporated muds, suds or wsc's were included in the DR funding. If no mud's, sud's or wsc's rec'd DR funding through the respective county, the COG should consider a waiver to allow them to receive MIT funding.

Any monies that are not disbursed or are given back, should be divided among those participating in the program but disbursed from Tier 2 into Tier 1—start at the bottom and go up until the money runs out.

Response to the City of Midway:

- Thank you for the diligent work in seeking to understand the program and the purpose of it. BVCOG has decided to reserve the initial \$10,729,000 for the initial 4 counties and get their funding allocations as close to the amount they need for their projects as possible, though they may not receive all the funding for a project. We have chosen to maintain the relative simplicity of the distribution instead of instituting a tiers system as you have proposed, but we recognize the ingenuity of the idea and appreciate the work put into thinking through the process.

Method of Distribution (MOD) for the Community Development Block Grant-Mitigation (CDBG-MIT) Funds

The City of Navasota was planning to be in attendance to provide input during the last public hearing for the Method of Distribution (MOD) for the Community Development Block Grant-Mitigation (CDBG-MIT) funds. **Since there have been no scheduled public hearings since February 2022, we would like to submit our written comments with input on the allocations to be included in the October 14, 2022, public hearing comments to the GLO.**

The City of Navasota has received a preliminary allocation of \$693,800 from the BVCOG, which is approximately 2.77% of the total allocation of \$25,041,000. Per the original CDBG-MIT-MOD requirements, the only eligible entities for participation in the BVCOG \$25 million method of distribution are Burleson, Washington, Grimes, and Madison counties and the cities within those jurisdictions. Per BVCOG's most recent email, they are proceeding with a MOD that sends money to jurisdictions within Brazos, Robertson, and Leon counties as well.

Now that Brazos, Robertson, and Leon cities and counties are included in the MOD, their total allocation adds to \$13,662,800, which is 54.58%, over half, of the allocation going to the jurisdictions that were originally not intended to be eligible for participation.

We would like to receive feedback on how the fund allocations were determined for the CDBG-MIT and advocate for an allocation of \$1.5 to \$2 million for necessary water infrastructure projects.

Previous Projects – Water Infrastructure and Flooding in the City of Navasota

Since 2015, the city has allocated a significant amount of resources to address our flooding concerns. The City of Navasota initiated the Railroad Street Revitalization Project to address the need for updated storm drain and water infrastructure, along with revitalization and beautification of the streets and sidewalks to compliment the private development underway and promote future private investment and economic development. The overall project has been a phased approach, ongoing for the last few years, and has concluded with the most recent drainage and street improvements.

The City of Navasota received a 2016 GLO CDBG-DR award in the amount of \$2 million for the Railroad Street storm sewer/drainage improvements and the City contributed additional funds to the project. Construction began underway in 2021, and the drainage portion of the project included replacing and installing a storm sewer pipe, junction boxes, culverts, and all associated appurtenances. On Railroad Street this included going from 36-inch pipes to 7'x7' box culverts along Railroad Street to substantially mitigate flooding and drainage concerns in the downtown area. This is critical for the dozens of new businesses opening and private investment that is occurring in Downtown Navasota to ensure that future flooding will no longer be as major of an issue to the downtown area.

Also, the Navasota Economic Development Corporation (NEDC) has been a partner in the Railroad Street drainage project. In 2018, the NEDC approved the construction of a parking lot

and drainage improvements for downtown at the intersection of Railroad St. and Washington Ave. (located between 101 E. Washington Ave. and 100 W. Washington Ave.). This project was completed in 2020 and added approximately 32 new concrete parking spaces to the downtown area, landscaping, and an 8'x8' box culvert extending from Washington Avenue to Cedar Creek. The cost of this project was approximately \$1 million paid for by the NEDC.

Foster Street Drainage Improvements

In response to the 2015 Floods (2015 Flood Infrastructure Competition – Flood and Drainage), the City of Navasota received a \$999,000 GLO CDBG award in 2018 to address rehabilitation & reconstruction of public improvements. These funds, along with matching funds by the City, in the amount of \$9,990, were used to reconstruct an existing drainage system by installing storm sewer pipe, repairing pavement and driveways, relocating utilities, installing headwall at outfall, and completing associated appurtenances. The improvements covered 2,800 linear feet on Wright, Willie, and Foster streets and provided benefits to 489 persons, of which 81% were in the low to moderate income (LMI) range.

\$10 Million – Capital Improvement Projects

In January 2018, the City of Navasota adopted a Capital Improvement Program (CIP) to effectively identify anticipated infrastructure needs and opportunities for the period of 2018-2022. In addition to upgrading streets and sidewalks, the CIP identifies opportunities to mitigate future flooding events in the Downtown Business District and in low to middle income (LMI) neighborhoods, as well as, to address drainage issues in Cedar Creek, which is the primary drainage channel for the City. The city continues to seek funding from all available sources to support completion of the CIP Projects, in efforts to prevent future flood events such as the 2015 Flood and to ensure necessary and sustainable infrastructure throughout the city to satisfy the needs of our citizens.

The City of Navasota would like to advocate for an allocation of \$1.5 to \$2 million for necessary water infrastructure projects.

Currently, we have a high need for a new water tower, water plant, and water well. To determine current and future utility needs within Navasota, the city consulted with a third-party engineering firm to provide a water model study, which has been included as an attachment. Under the current configuration, additional elevated storage is needed (3,531 connections per TCEQ and only 3,250 existing elevated storage connection capacity). Results of the water model show the need for a 2nd pressure plane along Highway 90 near the Navasota High School and Navasota Junior High. Therefore, the recommendation is to add a water plant and elevated tower at a second pressure plane in that area (slide from water model presentation attached).

Prices shown assume multi-column water tower and bolted steel ground storage tank, which are the most economical options available. Prices are based on current costs which have risen significantly in the last 18 months (the tower was \$0.85M in mid-2020).

The water tower and the water plant each would typically fit on a square 1-acre tract. Each could be made to fit on 1/2-acre tracts depending on geometry and topography. But as the site shrinks, there is less room for future expansion and maintenance. The water tower and water plant do not need to be adjacent to each other, although the water plant should be kept as close to Hwy 6 as

feasible to minimize line extension costs. Also, a future water well would likely be located in this area assuming good quantity and quality of water is available in the area.

Budget Costs for a new Water Tower & Water Plant:

\$1.35 M – 500,000 Gallon Elevated Tower

\$1.20 M – Water Plant

\$0.15 M – Pressure Regulation Stations and Linework

\$0.70 M - Engineering and Contingencies (26%)

\$3.4 Million

\$1.5 Million CDBG MIT Funds

\$1.9 Million Difference

The cost of a water well is estimated at \$2 million, which includes land acquisition and construction. Based on recent discussions with real estate brokers and developers,

Navasota will be experiencing significant growth east of Hwy. 6 between Hwy. 90 and Hwy. 105 E. This will include nearly 1,400-acre residential master-planned development. This development will increase our utility needs by 5,600 water meters and increase our population by over 15,000. The City of Navasota continues to be pro-active in planning for the future infrastructure, utility and drainage needs within our corporate city limits and ETJ. As properties are annexed within our city limits, the ETJ will begin to expand. Again, the city is requesting additional funding above the allocated \$693,800 to assist mitigate funding needs.

Response to City of Navasota:

- BVCOG appreciates the detail the City of Navasota has included in their public comment. We recognize the need for the project and hope the changes we have made contribute to providing Navasota with more funding for this pressing need. BVCOG has decided to reserve the initial \$10,729,000 for the initial 4 counties and get their funding allocations as close to the amount they need for their projects as possible, though they may not receive all the funding for a project.

Public Comment for CDBG-MIT MOD

Agency: Washington County
Name: Wesley Stolz, P.E County Engineer
See attached for executive summary of discussed Washington County project.



Washington County, Texas

East County Storm Bypass Project Executive Summary

Overview

The East County Storm Bypass Project intent is to reduce emergency response time and allow traffic access and evacuation points for the eastern region of Washington County during significant storm events. All access routes that connect the Southeast to the Northeast regions of Washington County are subject to closure during storm events and have repeatedly been closed in previous years (See Figure 1 below). During flooding of the roadway crossings of New Year Creek the shortest detour would be State Highway 290 to State Highway 105 in Brenham, Texas which would require an additional twelve and a half (12.5) miles commute for first responders.

Flood Depth (1%)

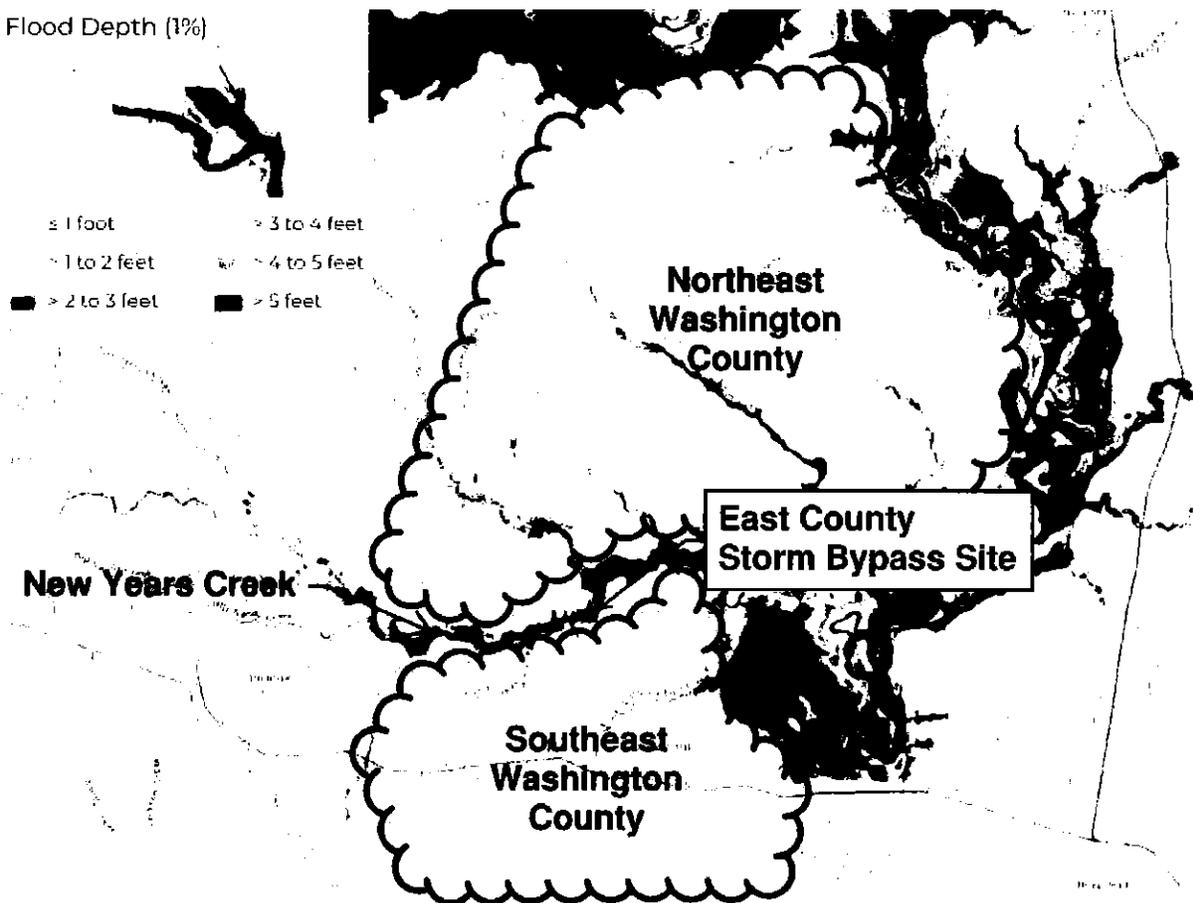


Figure 1 - Washington County Regions and Flood Depths

Impacts

The East County Storm Bypass Project would elevate the South Meyersville roadway surface to the adjacent base flood elevation (BFE) so as to allow emergency and vehicular crossings of up to 1% storm events. This crossing would reduce the anticipated detour by approximately eight (8) miles. See Figure 2 below for the existing and proposed detours due to significant storm events.

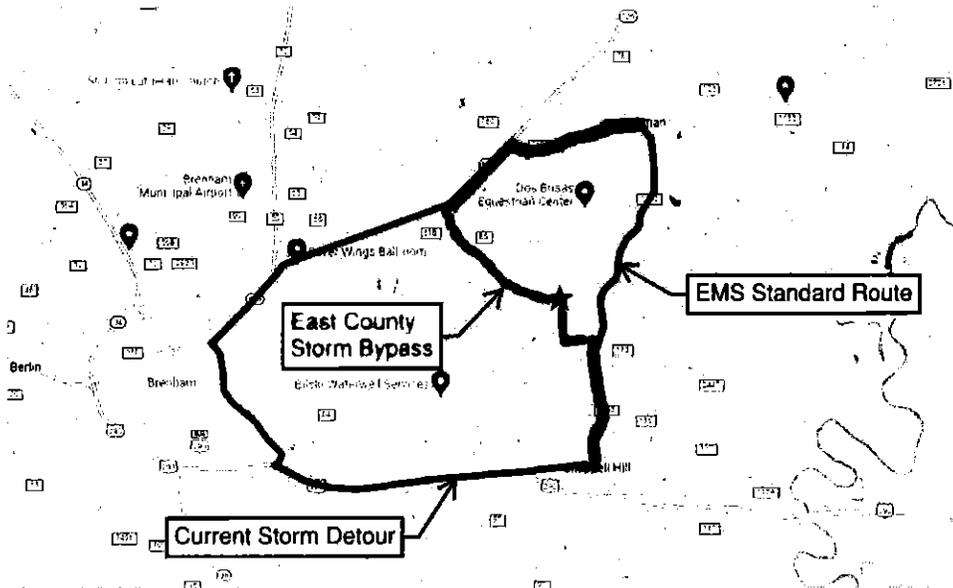


Figure 2 - Existing and Proposed Storm Detours

A significant area impacted by the New Year Creek floodplain is located within the designated low to moderate income area as established by the United States Census Bureau (see Figure 3 below). The response times to this area has historically been greatly impacted by the road closures during significant storm events. The East County Storm Bypass would provide significantly improved access from the Chappell Hill Emergency Services Station to the area during storm events.

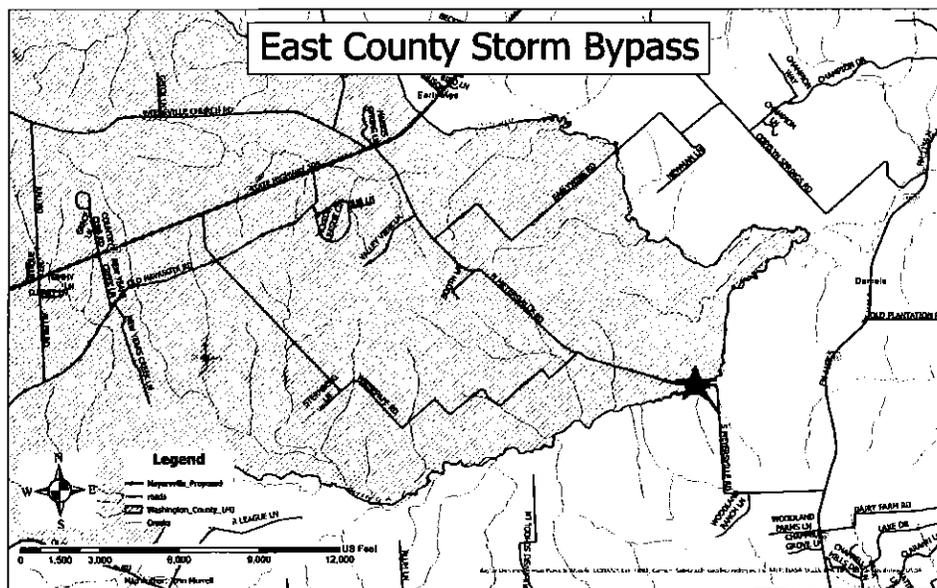


Figure 3 - Low to Moderate Income Designated Area (US Census Bureau)

Existing Conditions

The South Meyersville Road Crossing of New Year Creek consists of a 20'x30' steel bridge. South Meyersville Road includes a twenty (20) foot wide flexbase roadway (Figure 4 below). The South Meyersville roadway surface elevation at the creek crossing is approximately 174' and the corresponding BFE is 182'.



Figure 4 - Existing Conditions of South Meyersville Road New Year Creek Crossing

Project Description

The East County Storm Bypass focuses on the South Meyersville Road and New Year Creek Crossing. A new 120' bridge spanning the crossing is proposed along with elevating the roadway surface by a maximum of eight (8) feet over the course of approximately twelve hundred (1,200) feet. The South Meyersville Road reroute would require acquisition of an eighty (80) foot wide right of way resulting in approximately two and three quarter (2.75) acres. See Figure 5 below for the proposed East County Storm Bypass Project Layout. The opinion of probable construction costs for the East County Storm Bypass Project is \$1,466,780 and can be found in Exhibit A attached.

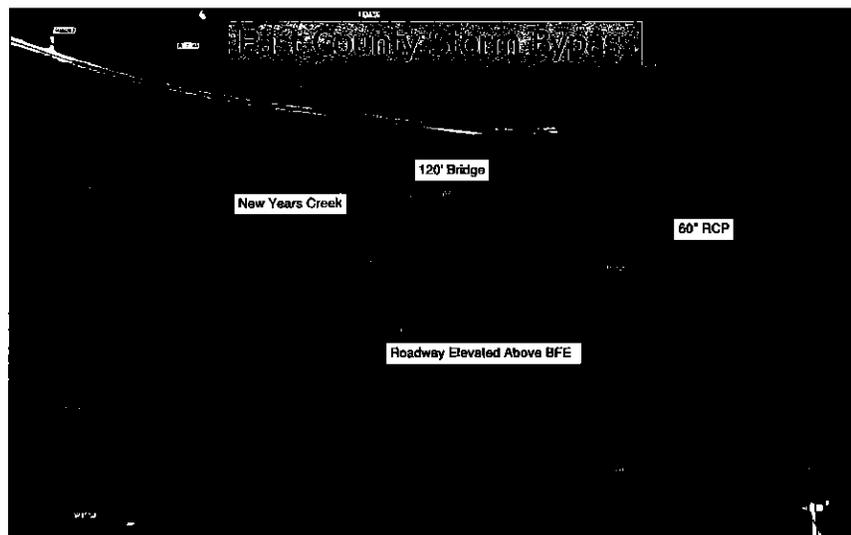


Figure 5 - East County Bypass System Site Plan

EXHIBIT A - OPCC

Central Gateway Sewer Bypass Project

One mile east of North Meyersville Road and Wiesepape Road Intersection

Item	Unit	Qty	Unit Cost	Total
Construction				
Embankment	CY	13,625	\$ 38.40	\$ 523,200.00
Bridge (120')	LS	1	\$ 334,800.00	\$ 334,800.00
60" RCP	LF	130	\$ 340.00	\$ 44,200.00
36" RCP	LF	120	\$ 96.00	\$ 11,520.00
Flexible Base	TON	2,820	\$ 30.00	\$ 84,600.00
Fly-Ash	TON	65	\$ 168.00	\$ 10,920.00
ROW Clearing	LS	1	\$ 18,000.00	\$ 18,000.00
Traffic Control	LS	1	\$ 12,000.00	\$ 12,000.00
Riprap	CY	30	\$ 168.00	\$ 5,040.00
Seeding	SY	7,500	\$ 1.80	\$ 13,500.00
Cement Stabilized Sand	CY	480	\$ 30.00	\$ 14,400.00
Fence Replacement	LF	1,500	\$ 6.00	\$ 9,000.00
Mobilization	LS	1	\$ 54,059.00	\$ 54,060.00
Construction Total				\$ 1,135,240.00

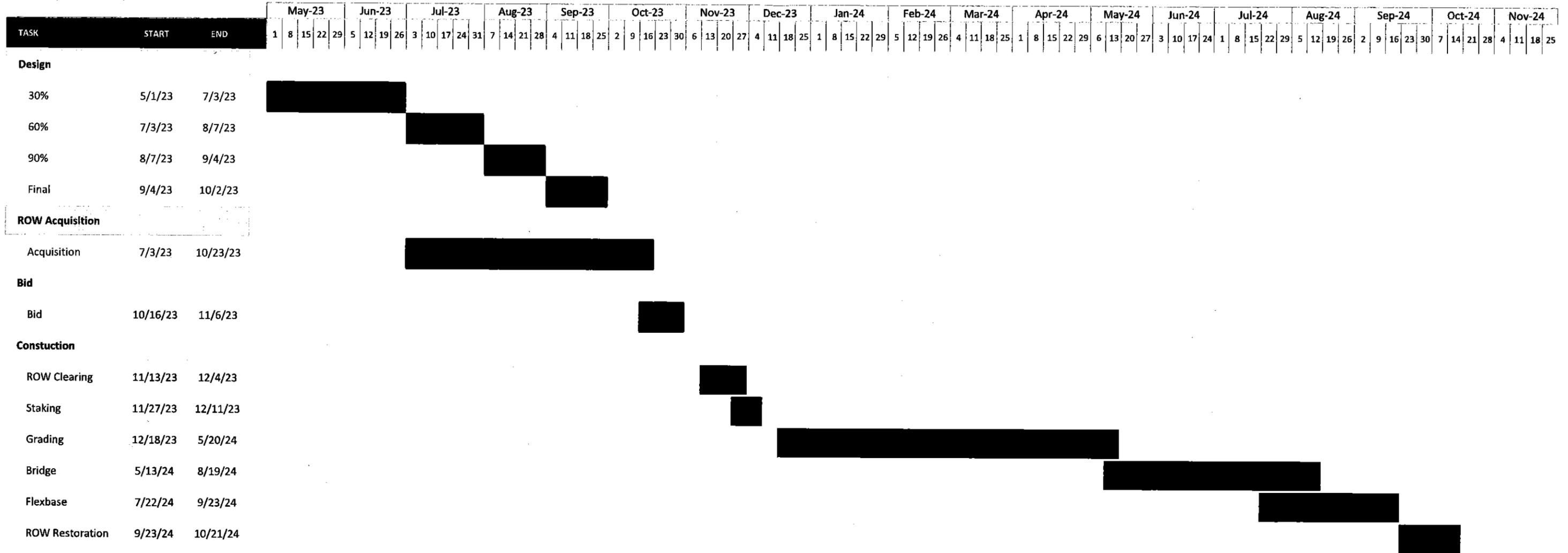
ROW Acquisition				
ROW Acquisition	Acre	2.75	35000	\$ 96,250.00

Professional Services	
Professional Services	\$ 170,290.00
Administration	\$ 65,000.00
Professional Services Total	\$ 235,290.00

Total \$ 1,466,780.00

East County Storm Bypass

Washington County



COG: **Brazos Valley**

Summary of Funding Acknowledgement Letters

Entity	Allocation	LMI Portion	LMI Percentage	Funding Letter Returned	Accepted or Denied?
Burleson County	\$ 1,076,300.00	\$ -	0.00%	Yes	Accepted
Caldwell	\$ 892,100.00	\$ -	0.00%	Yes	Accepted
Snook	\$ 917,200.00	\$ 458,600.00	50.00%	Yes	Accepted
Somerville	\$ 1,063,500.00	\$ 354,500.00	33.33%	Yes	Accepted
Grimes County	\$ 996,700.00	\$ 332,233.33	33.33%	Yes	Accepted
Anderson	\$ 734,400.00	\$ -	0.00%	Yes	Accepted
Iola	\$ 674,800.00	\$ -	0.00%	Yes	Accepted
Bedias	\$ 1,217,700.00	\$ 1,217,700.00	100.00%	Yes	Accepted
Navasota	\$ 996,400.00	\$ 332,133.33	33.33%	Yes	Accepted
Plantersville	\$ 500,000.00	\$ -	0.00%	Yes	Accepted
Todd Mission	\$ 1,277,000.00	\$ 1,277,000.00	100.00%	Yes	Accepted
Madison County	\$ 912,600.00	\$ 304,200.00	33.33%	Yes	Accepted
Madisonville	\$ 1,041,400.00	\$ 1,041,400.00	100.00%	Yes	Accepted
Midway	\$ 982,800.00	\$ 982,800.00	100.00%	Yes	Accepted
Washington County	\$ 1,119,800.00	\$ 373,266.67	33.33%	Yes	Accepted
Brenham	\$ 1,044,500.00	\$ 522,250.00	50.00%	Yes	Accepted
Burton	\$ 593,800.00	\$ -	0.00%	Yes	Accepted
Brazos County	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Bryan	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
College Station	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Wixon Valley	\$ 500,000.00	\$ -	0.00%	Yes	Accepted
Kurten	\$ 500,000.00	\$ -	0.00%	Yes	Accepted
Robertson County	\$ 500,000.00	\$ 166,666.67	33.33%	Yes	Accepted
Bremond	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Calvert	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Franklin	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Hearne	\$ 500,000.00	\$ 166,666.67	33.33%	Yes	Accepted
Leon County	\$ 500,000.00	\$ -	0.00%	Yes	Accepted
Centerville	\$ 500,000.00	\$ 250,000.00	50.00%	Yes	Accepted
Jewett	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Leona	\$ 500,000.00	\$ -	0.00%	Yes	Accepted
Marquez	\$ 500,000.00	\$ 166,666.67	33.33%	Yes	Accepted
Normangee	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Oakwood	\$ 500,000.00	\$ 166,666.67	33.33%	Yes	Accepted
Buffalo	\$ 500,000.00	\$ 500,000.00	100.00%	Yes	Accepted
Total	\$ 25,041,000.00	\$12,612,750.00	50.37%		