

The background of the right side of the image is a photograph of a two-story house with a wooden deck and stairs. The entire image is overlaid with a semi-transparent blue filter. The text "The Regional Mitigation Program" is centered over this image in a white, sans-serif font.

The Regional Mitigation Program

TEXAS GENERAL
LAND OFFICE

Community Development and Revitalization



AGENDA

- **Application:**
Grant Management Team
- **Quickbase:**
Grant Management Team
- **Procurement Practices:**
Monitoring & Quality Assurance Team
- **Environmental Regulations:**
Regulatory Oversight
- **CDBG Mitigation Viewer:**
GIS Team
- **Fair Housing:**
Grant Management Team
- **Section Recaps**



Application: Grant Management Team

- Application Resources available on the GLO's Recovery website
- A high-level overview of the application by section



Application Resources

The Regional Mitigation Application Guide and other resources can be found on the recovery.texas.gov website:

<https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html>

Application Material Resources

- > [Regional Mitigation Application Guide](#)
- > [Federal SF-424 Form](#)
- > [Federal SF-424 Form Instructions](#)
- > [Budget Justification of Retail Costs](#)
- > [Local Certification Form](#)
- > [2021 LMISD Data](#)
- > [Survey Methodology Manual](#)
- > [FY 2021 Non-entitlement Upper Quartile Counties](#)
- > [FY 2021 Entitlement Upper Quartile Communities](#)
- > [FY 2022 Survey Questionnaire – 80% \(English\)](#)
- > [FY 2022 Survey Questionnaire – 80% \(Spanish\)](#)
- > [Survey Tabulation Form](#)
- > [Random Number Generator](#)
- > [Race and Ethnicity/Gender Calculator](#)
- > [Procurement Guidance](#)
- > [Geographic Information Systems \(GIS\) CDBG-MIT Mapping Viewer](#)



Application Sections

General Tab

Program Selection
Application Contacts
SF-424 Information

Activities

Project Details

Eligibility, Beneficiaries, Census Information, Schedule, Budget

Duplication of Benefits

Other Project Funding

Local, Insurance, TPWD, FEMA, Other Assistance

Fair Housing

Methods and Criteria Used To Prioritize Fair Housing
Project Impact To Protected Classes
Project Impact To Areas of Poverty

Citizen Participation

Requirements For This Application
Documentation Needed

Procurement

2 CFR §200.318-§200.327
Guidelines



General Tab

- Program Selection
- Application Contacts
- Application Requested Amount
- DUNS/UEI
- Financial Information (Fiscal Year)
- SF-424

Employer Identification Number (EIN)
134652649

Taxpayer Identification Numbers (TIN)
265498712

UEI (Unique Entity Identifier)
1364652975

* a. Legal Name: City of Rango

* b. Employer/Taxpayer Identification Number (EIN/TIN): 265498712

* c. Organizational DUNS: 1326549875

For more info, refer to the [Unique Entity Identifier \(UEI\) Fact Sheet \(ed.gov\)](#) or watch this short video: [Get a Unique Entity ID](#)

Please note a requirement to complete all contracting actions is to have a valid and current DUNS registration. Based on the date indicated, you may be required to update the DUNS registration in the future as to not delay the contracting process.

Data Universal Numbering System (DUNS)
1326549875

DUNS numbers must be 9 digits. Please exclude special characters (dashes, etc.)

SAM.gov Registration Expiration Date
12-31-2022

Please upload a current printout of the SAM.gov registration.
Add Document

Document Attached Edit
No documents found

* a. Federal \$3,000,000.00

* b. Applicant \$151,000.00

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL \$3,151,000.00

Program Budget Code	CDBG-MIT Planned Amount	Other Funds	Total		
Construction	\$2,400,000.00	\$150,000.00	\$2,550,000.00	80.9%	✓
Engineering	\$340,000.00	\$0.00	\$340,000.00	10.8%	✓
Grant Administration	\$230,000.00	\$1,000.00	\$231,000.00	7.3%	✓
Special Environmental	\$0.00	\$0.00	\$0.00	0.0%	✓
Environmental	\$10,000.00	\$0.00	\$10,000.00	0.3%	✓
Acquisition	\$20,000.00	\$0.00	\$20,000.00	0.6%	✓
TOT	\$3,000,000.00	\$151,000.00	\$3,151,000.00	100.0%	



Activities

- Eligible Activity
- Project Details
- National Objective
- Beneficiaries
(Race/Ethnicity/Gender)
- Census Tracts/Block Groups
- Project Schedule
- Project Budget

National Objective

Provide Total Number of Beneficiaries
1150

Provide number of LMI Beneficiaries
750

Percentage of LMI Beneficiaries
65.22%

Is the applicant a HUD Exception Grantee?
No

Which HUD national objective does the project meet?
LMI

Describe activities that benefit low- and moderate-income people.
Flood and Drainage activities to benefit low to moderate

Method(s) used to determine the beneficiaries:
LMI Area Benefit

What method was used for Beneficiary Identification?
Census (HUD LMISD)

Provide a brief description of the beneficiary identification method used to determine this national objective and upload supporting beneficiary maps, census data, and/or survey documents. (Recommended 200 words)
Census tract was used as a significant number of households within the block group in which this project falls will benefit from the flood and drainage activities

Please upload supporting beneficiary maps, census data (maps), and LMISD data.
Add Document

- > [FY 2021 Non-entitlement Upper Quartile Counties](#)
- > [FY 2021 Entitlement Upper Quartile Communities](#)

Budget

Construction

Does the construction budget include all costs necessary to complete the project?

- Total materials in linear feet or units from the Budget Justification of Retail Costs?

Engineering

Does the engineering budget include all costs necessary to complete the project?

- Permitting costs
- Required hydrology work
- Required design work

Engineering is capped at 15% of construction costs

Acquisition

Does the acquisition budget include all costs necessary to complete the project?

- Total parcel costs
- Appraisal costs
- Notification to owner costs

Environmental and Grant Administration

TABLE 3: CDBG-MIT PROJECT CAPS

Total CDBG-MIT Award (Non-Housing Activities)	Percentage Cap
\$249,999.99 or less	13%
\$250,000-\$749,999.99	11%
\$750,000-\$999,999.99	10%
\$1 million-\$24,999,999.99	8%
\$25 million or over	6%

Duplication of Benefits (DOB)

- Local Funds
- Insurance
- Texas Water Development Board
- FEMA
- Other Types of Assistance

All Project Funding Must Be Disclosed

FEMA Coverage

Any and all FEMA funds received for benefit of any project proposed in this application must be fully disclosed and detailed to ensure the best cross-agency coordination and that duplication of benefits does not occur.

Did you receive any FEMA funding?

Yes

Do you anticipate receiving any FEMA funding?

No

Was the project previously funded by FEMA?

No

Insurance Coverage

Any and all insurance proceeds received for benefit of any project proposed in this application must be fully disclosed and detailed to ensure that funds are used most efficiently, and that duplication of benefits does not occur.

Did the applicant have insurance coverage on the proposed project?

Yes

Name of Insurance Company

Other Funding

Any and all funds identified for use on any project proposed in an application must be fully disclosed. Make sure information is complete and matches the budget provided.

Has the applicant submitted a request to fund a part of or the whole project described in the application?

Yes

Are local or other funds available to address the proposed project in whole or in part?

Disclose source(s) and use(s) of non-CDBG-MIT funds (Each row is a funding source)

[Add Other Funds](#)

Full Report | Email | More ▾ 2 Other funds

Funding Source	Use of Funds	Amount	
Local Funds	Acquisition	\$1,000.00	✓
Local Funds	Construction	\$150,000.00	✓
TOT		\$151,000.00	



Fair Housing

- What are the identified protected classes, racially and ethnically concentrated areas, and concentrated areas of poverty that may be impacted by this project?
- Provide a meaningful analysis that describes how these identified populations may be impacted by the project
- Create and upload an AFFH Outcome Report on the Mitigation Viewer located at the link below.

<https://gis-glo-cdr.hub.arcgis.com/pages/cdbg-mitigation-viewer>

Affirmatively Furthering Fair Housing

Any locality receiving CDBG-MIT funds must certify that it will affirmatively further fair housing. Identify the activities already achieved to affirmatively further fair housing, and those new activities to be undertaken if a CDBG-MIT award is made. Please also provide an estimate of when that activity will be complete. Localities should be aware that, in the event of funding, these fair housing efforts will be monitored. Other activities may be eligible, and the applicant may contact the GLO to determine eligibility.

What methods and criteria were used to prioritize the projects in the application, including affirmatively furthering fair housing?

Please reference the CDBG Mitigation Viewer for access to information and data on how to identify your populations that may be impacted by this project: <https://gis-glo-cdr.hub.arcgis.com/pages/cdbg-mitigation-viewer>. Please provide the document generated using the CDBG Mitigation Viewer to the document upload at the bottom of this screen.

What are the identified protected classes, racially and ethnically concentrated areas, and concentrated areas of poverty that may be impacted by this project?

Provide a meaningful analysis that describes how these identified populations may be impacted by this project.

Citizen Participation

- An application under the CDBG-MIT program may be awarded only if the locality certifies provides evidence that, at a minimum, the substantially complete* application was publicly posted for at least a 14-day public comment period, comments received, and responses provided.

* A substantially complete application must include all project descriptions, locations, budgets and beneficiary information.

Citizen Participation

The streamlined requirements do not mandate public hearings but do require a reasonable opportunity (at least 14 days) for citizen comment and ongoing citizen access to information about the use of grant funds.

Did the applicant post the CDBG-MIT application for a minimum of fourteen (14) days?

Yes

When did your jurisdiction post the project for public comment?

Start Date 07-28-2022

End Date 08-11-2022

Please upload proof of public posting.

Add Document

Document Attached Edit

No Document records found

Although a public hearing is not required, if your jurisdiction held one, list the date and attach the supporting documents.

mm-dd-yyyy

If a public hearing was held, please upload documentation in support to the public hearing.

Add Document

Document Attached Edit

No Document records found

Although a resolution is not required, did your jurisdiction approve one?

Procurement

- Applicants must follow the procurement process guidelines set forth in 2 CFR §200.318-§200.327 for grant administration, environmental, and engineering services if using CDBG-MIT funds to pay third-party vendors for those services. These rules and regulations also apply to procurement of construction services

Rango County > Vendor

Grant Administration

Please provide the current status of procurement(s) intentions for this vendor

Procured

In House
Procured
Procured Later

Contact Name
Mary Stone

Contact Phone
(555) 555-5555

Contact Email
mary.stone@TxRecovery.com

Save & Return to Intake

Grant Administration

Please provide the current status of procurement(s) intentions for this vendor

In House

If in house, how will this activity be performed?

Contact Name

Save & Return to Intake

Quickbase Application Details: Grant Management Team

The GLO has created the program's application through a Quickbase platform. Applicants will be required to register for the platform and complete an application to be considered by the GLO.



Register for Quickbase

- Access the recovery.texas.gov website under the "Mitigation"- "Regional Mitigation" page
- Registration can occur by accessing the "Application Registration" link on the "Regional Mitigation" page
- Applicants can always access the application portal by accessing the "Application Portal" link on the "Regional Mitigation" page

The screenshot shows a dark blue navigation bar with the following items: Disasters, Mitigation (highlighted with a blue box), Planning Studies, Grant Administration, and HUD Requirements. Below the navigation bar is a vertical menu with the following items: Programs (highlighted with a blue box), Resilient Communities Program, Coastal Resiliency, Regional Mitigation (highlighted with a blue box), Local Hazard Mitigation Plans, Mitigation Competitions, Planning, and Homeowner Programs. Below the menu are social media icons for Facebook, Twitter, Instagram, Pinterest, YouTube, and Medium. To the right of the menu is a content area with the following text:

METHOD OF DISTRIB

Under the Regional Mitigation Program (MOD) allocating CDBG-MIT funds to elig differently and has different hazards and tropical storms and depressions, flooding

Program Process:

1. COGs will develop a COG MOD thro
2. GLO will review and approve respec
3. GLO will make available an applicat
4. Eligible entities will apply for mitiga
5. GLO will review applications for pro
6. GLO will execute a contract betwee

Application Information:

Entities who have been identified in resp receive direct notification from the GLO, notification letter for the specific due dat

All applications must be completed thro

> [Application Registration](#)

> [Application Portal](#)



Register for Quickbase

- To register, the applicant will be required to provide an email address, name, and agree to the terms and conditions (example)
- Applicants will receive a registration email to the respective email account provided during registration
- The applicant should use the links within this email to create a password
- If you have questions, please contact cdr.mitigation@recovery.texas.gov

Email Address *	First Name *	Last Name *
<input type="text"/>	<input type="text"/>	<input type="text"/>

By using or accessing this tool ('Quickbase Database'), You (the individual or legal entity) agree to be bound by the terms of this End User License Agreement ('EULA') between You ('You' or 'Your') and ICF Incorporated LLC ('ICF' or 'we' or 'us').

Your use of (a) the website located at <https://dmsrecovery.quickbase.com/> sub-domains (each, a 'Site') and (b) services through the Site (and any updates thereto) ('Site Services') is governed by this EULA.

BY ACCESSING AND USING THE QUICKBASE DATABASE, YOU ARE ACCEPTING AND AGREEING TO THIS EULA ON BEHALF OF YOURSELF OR THE ENTITY YOU REPRESENT IN CONNECTION WITH THE ACCESS. YOU REPRESENT AND WARRANT THAT YOU HAVE THE RIGHT, AUTHORITY, AND CAPACITY TO ACCEPT AND AGREE TO THIS EULA ON BEHALF OF YOURSELF OR THE ENTITY YOU REPRESENT.

1. Restrictions

Except as otherwise agree to in writing by the parties, You agree not to, and You will not permit others to:

- 1.1. Share or disseminate personally identifiable information contained in the Quickbase Database.
- 1.2. license, sell, rent, lease, assign, distribute, transmit, host, outsource, disclose or otherwise commercially exploit the Quickbase Database or make the Quickbase Database available to any third party.
- 1.3. copy or use the Quickbase Database for any purpose,
- 1.4. modify, make derivative works of, decompile, disassemble, reverse compile or reverse engineer or attempt to derive source code of any part of the Quickbase Database (except to the extent applicable laws specifically prohibit such restriction for interoperability purposes, in which case You agree to first contact us and provide us an opportunity to create such changes as are needed for interoperability purposes).
- 1.5. share Access Credentials with others.
- 1.6. use the Quickbase Database to provide third party training.
- 1.7. display, store, process or transmit any Content, that may (i) menace or harass any person or cause damage or injury to any person or property; (ii) involve the publication of any material that is false, defamatory, harassing or obscene; (iii) violate privacy rights or promote bigotry, racism, hatred or harm; (iv) constitute unsolicited bulk e-mail, "junk mail", "spam" or chain letters; (v) constitute an infringement of intellectual property or other proprietary rights.
- 1.8. use the Quickbase Database for any unlawful purposes.

2. Confidentiality. You agree to use the Quickbase Database and ICF's other Confidential and Proprietary Information only as expressly set forth herein, not to disclose such Confidential and Proprietary Information to any third party and to maintain adequate procedures to prohibit the unauthorized disclosure, duplication, misuse or removal of the Quickbase Database.

3. Site Policies. You agree to comply with the Terms of Service and Privacy Policy governing use of the Site.

4. Indemnification. You agree to defend, release and indemnify ICF, Quickbase, and their respective employees, agents, officers, directors, representatives, successors, heirs, assigns, affiliates, shareholders, parent companies, subsidiaries, indemnities, and insurers from any and all claims arising from Your use of the Quickbase Database or breach of this EULA.

5. No Warranty. ICF makes no warranty that the Quickbase Database will be uninterrupted, free of viruses or other harmful code, timely, completely secure or error-free. You agree Your use of the Quickbase Database is on an 'as is' basis.

I have read and agree to ICF's Term of Service and Privacy Policy *



Quickbase Home Page

- The home page will have a place to begin the application
- The home page will contain a banner to indicate the status of each section of the application, “Complete” or “Incomplete”
- Using the “Edit” button will allow the applicant to address any “Incomplete” sections or responses

The screenshot shows the Quickbase interface for the Regional Mitigation Program Applicant Homepage. At the top, there is a navigation bar with a 'Home' button. Below this is a breadcrumb trail: 'Regional Mitigation Program > Applicant Homepage'. A dark blue banner features the Texas General Land Office seal and the text 'Regional Mitigation Program Texas General Land Office | Community Development & Revitalization | CDBG-MIT'. The main content area starts with a 'Welcome' message, followed by instructions: 'To start a new Application, click [HERE](#)' and 'To continue an existing application, locate the Application in the table below and click “Edit” or “View” to open it.' Below the text is a table with application details. The table has columns for 'Ref ID', 'Applicant Name', and several status categories: 'General', 'Activities', 'Duplication of Benefits', 'Fair Housing', 'Citizen Participation', 'Procurement', and 'Edit'. The 'Edit' button is highlighted in yellow. The table also shows 'Last edited on 05-25-2022'.

Ref ID	Applicant Name	General	Activities	Duplication of Benefits	Fair Housing	Citizen Participation	Procurement	Edit
2022-100037-RMP	Rango County	Complete	Complete	Incomplete	Complete	Complete	Complete	Edit

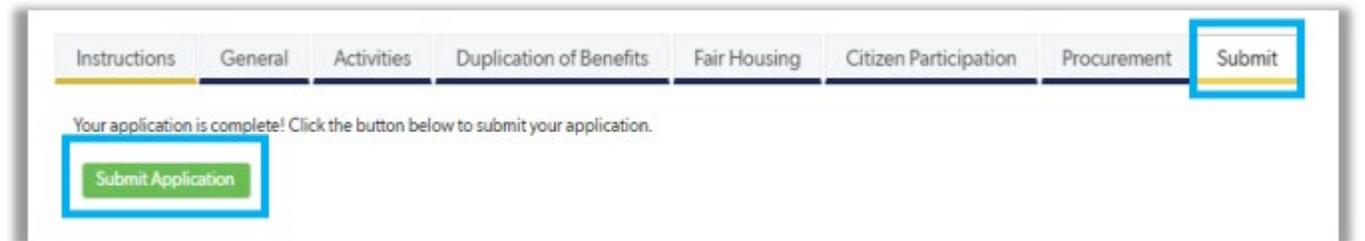
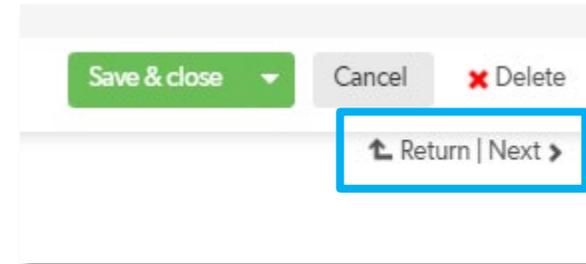
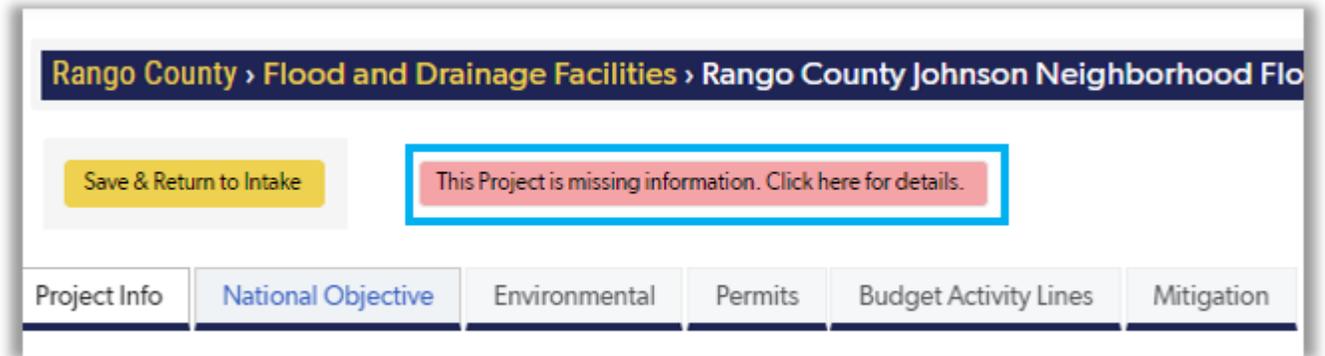
Quickbase Print Option

- All items, with the exception of Citizen Participation information, must be populated to allow printing
- Access the “Citizen Participation” tab to print
- To edit after posting, select the “Continue Editing Application” button on the Citizen Participation” tab

The screenshot shows the 'Regional Mitigation Program' interface. At the top, there is a header with the Texas General Land Office logo and the text 'Regional Mitigation Program Texas General Land Office | Community Development & Revitalization | CDBG-MIT'. Below the header is a navigation bar with tabs for 'Instructions', 'General', 'Activities', 'Duplication of Benefits', 'Fair Housing', 'Procurement', and 'Citizen Participation'. The 'Citizen Participation' tab is selected and highlighted. Underneath, the page title is 'Citizen Participation'. A message states: 'Your application is ready for public comment! Click the button below to print your application.' Below this message is a yellow button labeled 'Print Application for Public Comment' which is highlighted with a blue box. Further down, another message states: 'Your application is pending public posting.' Below this, there is a section titled 'What happens next?' with instructions: 'The Regional Mitigation Program requires citizen participation with a minimum 14 day public posting. Please share your application and return to this portal once the public posting is complete and submit proof of public posting.' Below this is a section titled 'Download a copy of your application here' with a message: 'Click the button below to print your application.' Below this message is a link: 'RMP_Aop_Form_2022-100105-RMP_(09-15-2022_0959_AM).pdf' with a lock icon. At the bottom of the page, there is a yellow button labeled 'Continue Editing Application' which is highlighted with a blue box.

Quickbase Useful Tips

- The application will inform the applicant if a necessary component has not been addressed
- The application will require entry of information that may require pop-up tables. In such case the applicant can utilize the “Next” and “Return” functions to navigate the section



Procurement Overview: Monitoring & Quality Assurance Team

- General overview of MQA
- Summary of procurement methodologies
- Best business procurement practices
- Resources/References



General MQA Overview

MQA's Mission Statement:

- Strives to provide an independent, objective, community-oriented approach to compliance monitoring and facilitate process improvements for the Community Development & Revitalization division.
- 2CFR Compliance
- Fraud, Waste, or Abuse
- Single Audit Reviews



Summary of Procurement Methodologies

Procurement Type	Methods of Reasonableness	Solicitation Method	Example Applications	Dollar Thresholds
Small Purchases	<ul style="list-style-type: none"> • Price Analysis 	<ul style="list-style-type: none"> • Quotes • Submitted bids 	<ul style="list-style-type: none"> • Supplies • Produced items • Single-task service 	<ul style="list-style-type: none"> • Federal: Under \$250,000 for produced items, services or supplies • Texas*: Under \$50,000 for other purchases
Sealed Bid	<ul style="list-style-type: none"> • Price Analysis 	<ul style="list-style-type: none"> • Submitted bids 	<ul style="list-style-type: none"> • Construction Services 	<ul style="list-style-type: none"> • Federal: Contracts over \$250,000 • Texas*: Contracts over \$50,000
Competitive Proposal	<ul style="list-style-type: none"> • Cost Analysis 	<ul style="list-style-type: none"> • Submitted proposals 	<ul style="list-style-type: none"> • Professional services • Design services 	<ul style="list-style-type: none"> • Federal: Services over \$250,000 and when sealed bids are not applicable • Texas*: Services over \$50,000 and when sealed bids are not applicable
Non-competitive	<ul style="list-style-type: none"> • Cost Analysis 	<ul style="list-style-type: none"> • Competition determined inadequate 	<ul style="list-style-type: none"> • Equipment or other items that may be specific to a provider. 	<ul style="list-style-type: none"> • Cannot exceed the aggregate dollar threshold of a micro purchase



Best Procurement Practices

- Updated policies and procedures (November 12, 2020)
- Independent Cost Estimate
- Cost analysis and Profit Negotiation
- Non-competitive procurements: Sole source and single bidder
 - Documentation for exemption
- GLO Implementation Manual ([LINK](#))
 - Documentation to be maintained for 3 years after state grant closure
- Procurement history documentation
- State Comptroller's debarment verification



References & Resources

- 2 CFR 200.318-327
- GLO Resources: Includes GLO Contract reports, GLO procurement policies, State of Texas Procurement and Contract Management Guide
- Appendix II to Part 200
- HUD Buying Right CDBG-DR and Procurement Guide



Environmental Regulations: Regulatory Oversight Team

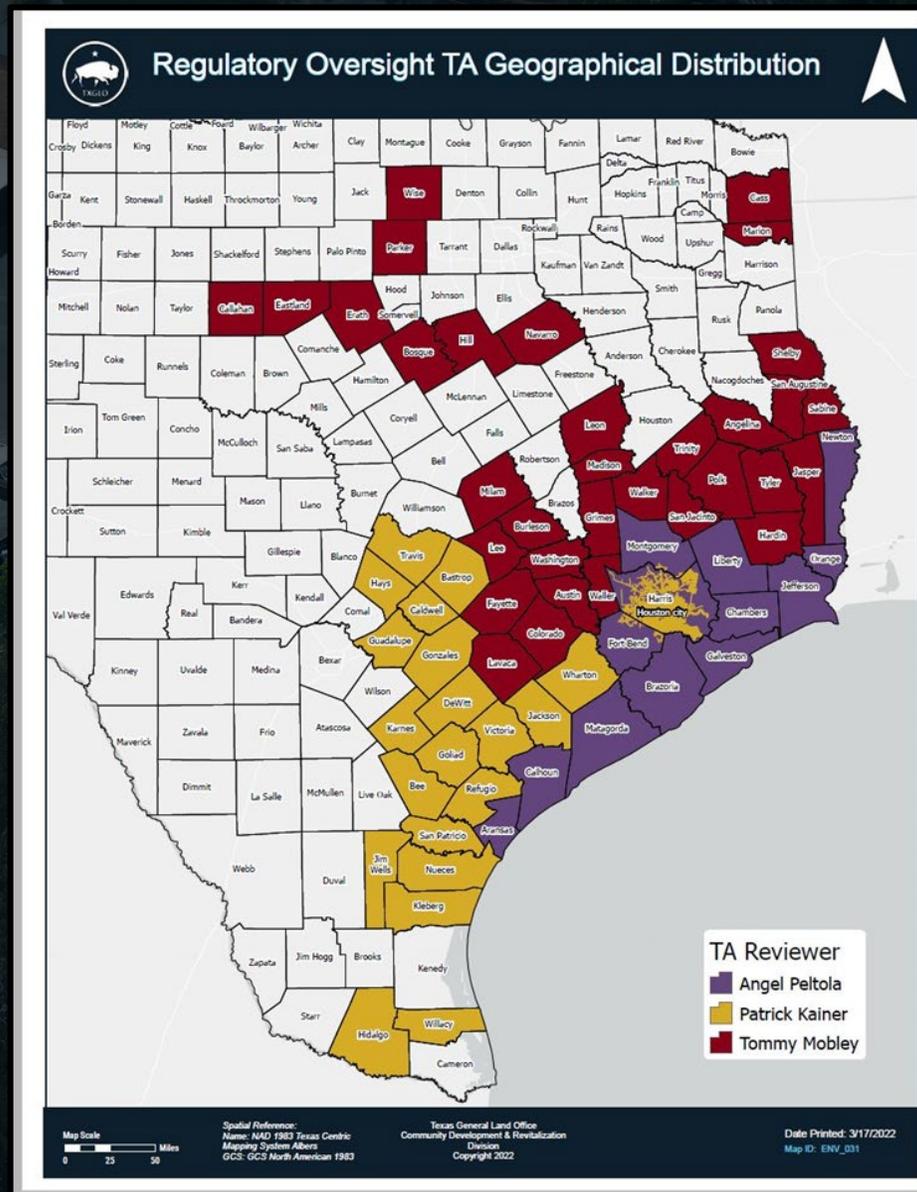
- Resources and Technical Assistance
 - Geographic Regions/Reviewers
 - Regulatory Oversight Webpage/Listserv
 - Environmental Review Mapping Application (ERMA)
- Environmental Review & Timing
 - FEMA Floodway Types
 - Critical Actions
 - Responsible Entities & Certifying Officers
 - Choice Limiting Actions
- CDBG-MIT Federal Register & State Action Plan
 - Nature Based Solutions/Green Infrastructure Resources
 - HUD, EPA and FEMA Examples
 - GLO Stormwater Retrofit Resiliency Design Guide



Technical Assistance

- Attend project kickoff meetings
- Provide project-specific guidance
- Resource planning
- Attend meetings as requested
- Attend field visits as requested
- Troubleshooting
- Collaboration
- One-on-One technical assistance and training as requested

env.reviews@recovery.texas.gov



Regulatory Oversight Resources

Webpage

- <https://recovery.texas.gov/grant-administration/environmental/index.html>
- Training Calendar
- Guidance Documents
- One Pagers & Policy Memos
- Videos
- HUD Guidance
- Contact Information

Environmental Listserv

Environmental Review Mapping Application

Regulatory - Environmental Guidance

Pursuant to 24 CFR Part 58, environmental reviews must be conducted on every activity involving CDBG-DR and / or CDBG-MIT funds.

The GLO will use contracted Environmental Service Providers to assist in the Environmental Review Process for Hurricane Harvey related tasks. These reviews must be completed prior to beginning funded activity to satisfy all federal, state and local requirements. Additionally, local entities administering CDBG-DR / CDBG-MIT programs must follow the same requirements even if CDBG-DR / CDBG-MIT funds only account for a small portion of the project. The GLO has developed a Regulatory Oversight department to manage the environmental review process and provide technical assistance to subrecipients within the program.

Announcement - ENVLIVE: A series of Trainings and Unscripted Conversations with your GLO Environmental Team

The GLO announces the following virtual training sessions titled "EnvLive: A series of Trainings and Unscripted Conversations with your GLO Regulatory Oversight Team". This free series provides resource specific training, and the "Unscripted Conversations" sessions provide an open forum to ask questions or raise concerns on environmental requirements.

Training Dates and Topics

Environmental Review Mapping Application

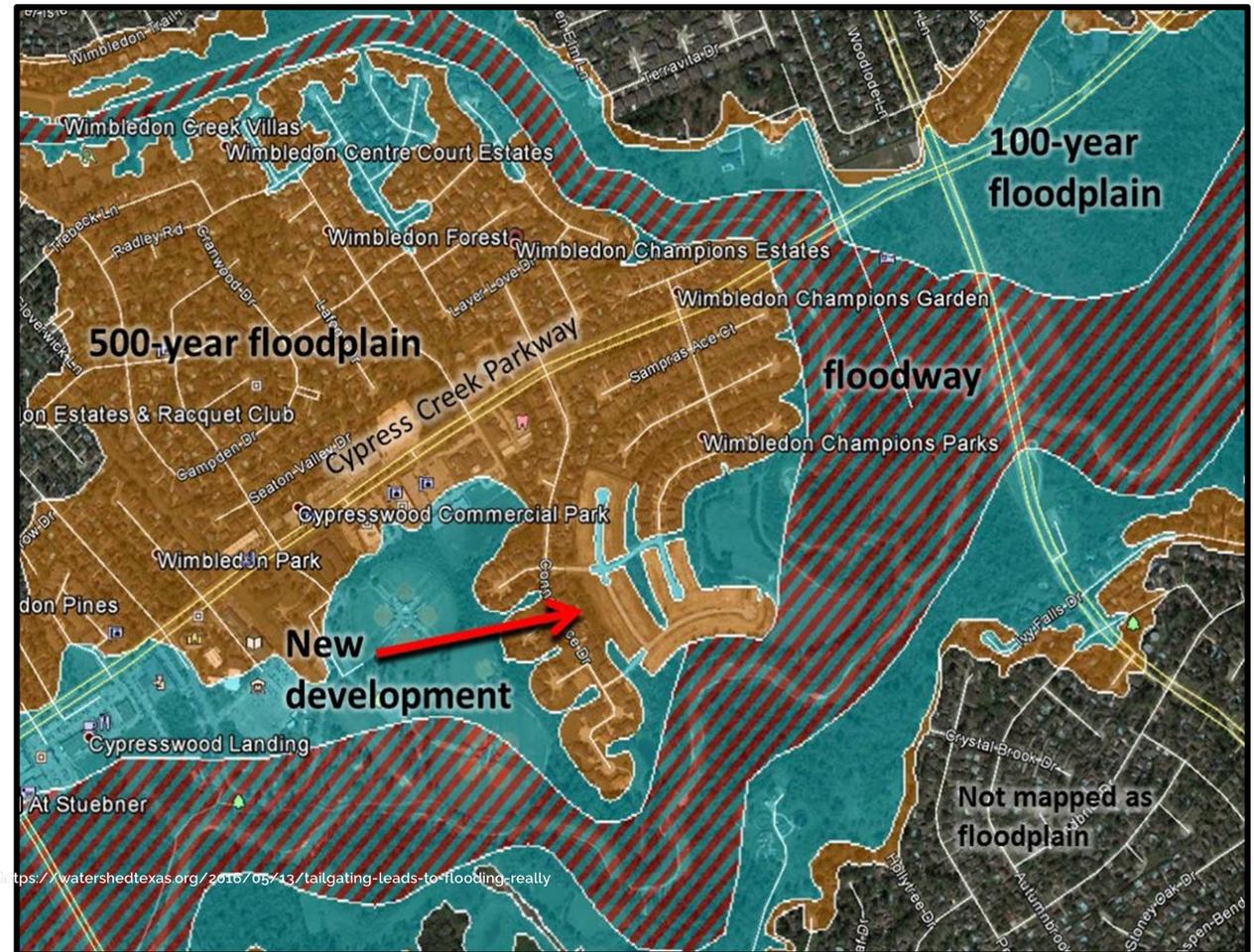
Legend

- Texas County Boundaries
- National Register of Historic Places Points
 - National Historic Landmark
 - National Register of Historic Places
- National Register of Historic Places Polygons
 - National Historic Landmark
 - National Register of Historic Places
- Coastal Zone Boundary



FEMA Floodplain Types

- **500-Year Floodplains** (Zone X-Shaded) are areas of moderate flood hazard, with at least a .2% chance of flood occurrence in any given year.
- **100-Year Floodplains** (A Zones) are areas of high flood hazard near body water with at least a 1% chance of flood occurrence in any given year.
- **A Regulatory Floodway** is the segment of the floodplain that will generally carry a flow of flood waters during a flood and is typically the area of greatest risk to structures in the floodplain. HUD assistance is prohibited unless exception is applicable.
- **Coastal High Hazard Areas** (or V Zones) are areas along the coasts subject to inundation by a 1% annual chance flood event (100-year floodplain) with additional hazards associated with storm or tidal-induced waves.



FEMA Floodplain Maps

Comparison of Flood Hazard
Effective & Preliminary Flood Hazards

Effective		Preliminary	
POI Longitude/Latitude	-97.8807, 29.9241	POI Longitude/Latitude	-97.8807, 29.9241
Effective FIRM Panel	48209C0392F	Preliminary FIRM Panel	48209C0392G
Effective Date	9/2/2005	Preliminary Issue Date	12/14/2022
Flood Zone	X	Flood Zone	AE
Static BFE*	Not Available	Estimated Static BFE*	Not Available
Flood Depth	Not Available	Estimated Flood Depth	Not Available
Vertical Datum	Not Available	Vertical Datum	Not Available

The FEMA Flood Insurance Rate Map (FIRM) is relied upon for the designation of “100-year floodplains” ([§ 55.2\(b\)\(9\)](#)), “500-year floodplains” ([§ 55.2\(b\)\(4\)](#)), and “floodways” ([§ 55.2\(b\)\(5\)](#)).

When FEMA provides interim flood hazard data, such as Advisory Base Flood Elevations (ABFE) or preliminary maps and studies, HUD or the Responsible Entity shall use the latest of these sources. **However**, base flood elevation from an interim, preliminary, or non-FEMA source cannot be used if it is less stringent than the current FIRM and Flood Insurance Study (FIS), **meaning you must use the more stringent map requirements when designing your project.**

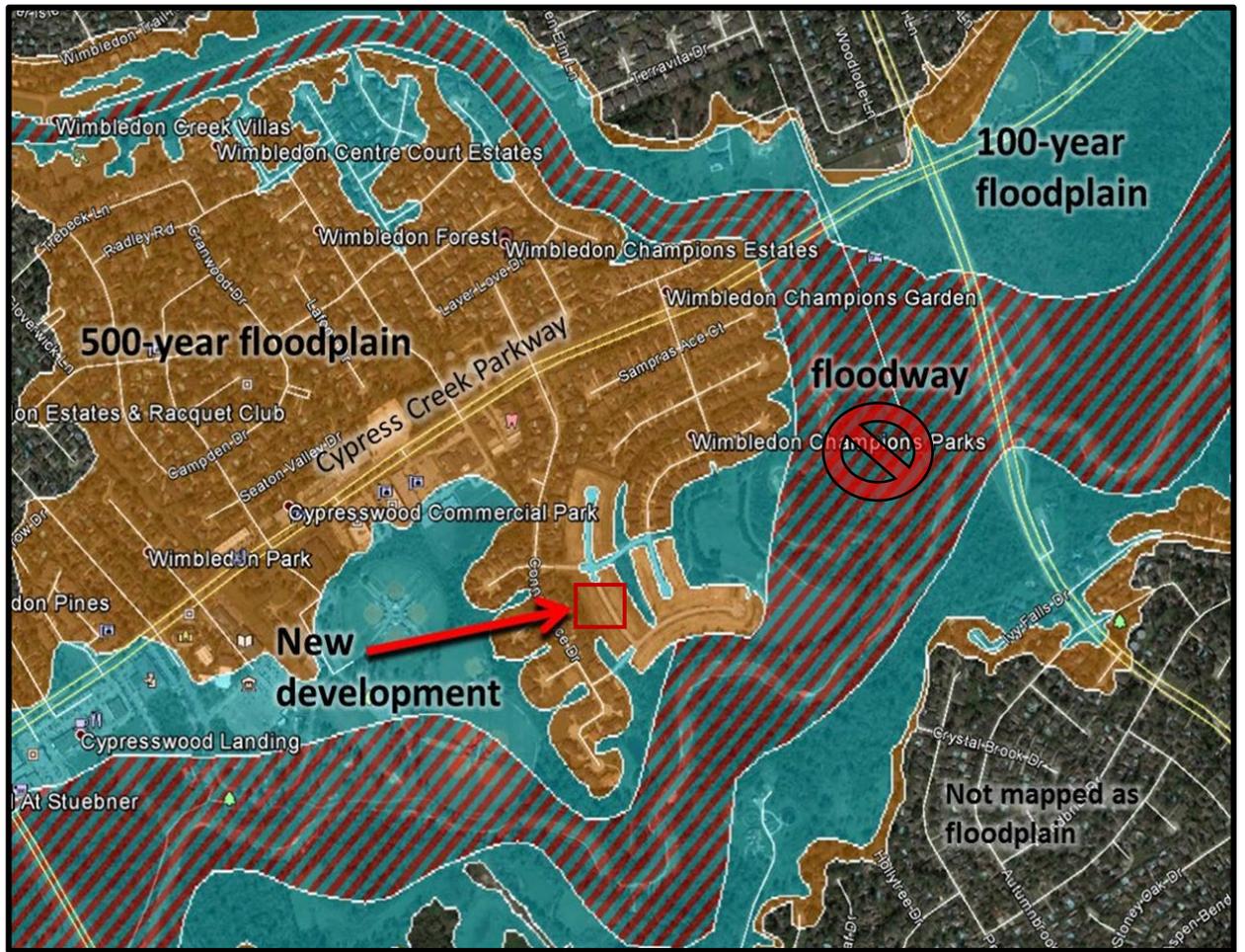
Critical Actions

24 CFR 55.2(b)(3)

REQUIRES SPECIFIC DESIGN: ELEVATION/FLOODPROOFING

Critical actions cannot occur in a floodway or coastal high hazard area.

- Nursing homes, hospitals, fire stations, care facilities, etc.
- Ingress/egress into critical action facilities
- Wastewater or water treatment plants
- Back-up generators for services considered "critical" (i.e., wastewater treatment plants)
- Provide essential and irreplaceable records or utility or emergency services
- Facilities that produce, use, or store highly volatile, flammable, explosive toxic, or water-reactive substances or compounds



Responsible Entity & Certifying Officer Duties

HUD Responsible Entity (RE) 24 CFR 58.10

- Assumes federal responsibilities
- Can only be a city, county, tribe or state
- Cannot be a public housing authorities, councils of government, water control district or school district

Responsible Entity Certifying Officer 24 CFR 58.13

- Evaluates the environmental review
- Is responsible for scope/content/compliance
- Makes environmental finding
- Goes to court in the event of a lawsuit

Part 2. Environmental Certification (to be completed by responsible entity)

With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did did not require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.
6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.
7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.

As the duly designated certifying official of the responsible entity, I also certify that:

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.
9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity.

Signature of Certifying Officer of the Responsible Entity	Title of Certifying Officer
<input checked="" type="checkbox"/>	<input type="text"/>
	Date signed
	<input type="text"/>
Address of Certifying Officer	
<input type="text"/>	

Part 3. To be completed when the Recipient is not the Responsible Entity

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient	Title of Authorized Officer
<input checked="" type="checkbox"/>	<input type="text"/>
	Date signed
	<input type="text"/>

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Previous editions are obsolete form HUD-7015.15 (1/99)

[HUD Request for Release of Funds and Certification Form 7015.15](#)



Choice Limiting Actions: 24 CFR 58.22

HUD's regulations at 24 CFR 58.22 prohibit grant recipients or any participant in the development process, including public or private nonprofit or for-profit entities, or any of their contractors, from **committing or spending HUD or non-HUD funds on any activity** that could have an adverse environmental impact or limit the choice of reasonable alternatives **prior to completion of an environmental review** once a project has become **federal** [[24 CFR 58.30\(b\)](#)]. This rule on "choice-limiting actions" prohibits physical activity, including acquisition, rehabilitation, and construction, as well as contracting for or committing to any of these actions.

Choice limiting activities occur in two commonly observed missteps:

1. Action taken on a project prior to the completion of the environmental review.
Example: committing funds (HUD or non-HUD funds) post-application submission, property acquisition, leasing, demolition, rehabilitation, construction, and site improvements (including site clearance).
2. Failing to adhere to the project re-evaluation process required by [24 CFR 58.47](#)
Example: making changes to the project post-AUGF without applicable review and/or consultations prior to the proposed changes being implemented.



CDBG-MIT Federal Register & State of Texas Action Plan

- The Federal Notice states: (8) Natural infrastructure. Grantees are **encouraged to develop a process to incorporate nature-based solutions and natural or green infrastructure in the selection and/or design of CDBG-MIT projects**. Each grantee is encouraged to describe how it will consider natural infrastructure during the project selection process (e.g., alternatives and benefit-cost analysis); or propose projects and programs in the action plan that incorporate natural infrastructure. Natural or green infrastructure is defined as the integration of natural processes or systems (such as wetlands or land barriers) or engineered systems that mimic natural systems and processes into investments in resilient infrastructure, including, for example, using permeable pavements and amended soils to improve infiltration and pollutant removal. (CDBG-MIT Federal Register: <https://www.govinfo.gov/content/pkg/FR-2019-08-30/pdf/2019-18607.pdf>)
- The State of Texas Action Plan states: **The GLO will encourage projects that incorporate nature-based solutions and natural or green infrastructure in the selection and/or design of CDBG-MIT projects**. The GLO will encourage subrecipients to consider natural infrastructure during the project selection process (e.g., alternatives and benefit-cost analysis). (CDBG-MIT Action Plan: <https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-ap.pdf>)



Green Infrastructure - Case Study #1



Lancaster, Pennsylvania is converting impervious areas such as parking lots (shown here in red) to permeable pavement within their combined sewer area. By using green infrastructure to infiltrate water on site, the city estimates they will reduce flows into their system by 700 million gallons – reaping over \$600,000 annually in savings. Photo credit: City of Lancaster

https://www.epa.gov/sites/default/files/2015-10/documents/climate_res_fs.pdf

Site, Neighborhood & Watershed Scale



RAIN GARDENS

A rain garden is a shallow, vegetated basin that collects and absorbs runoff from rooftops, sidewalks, and streets.

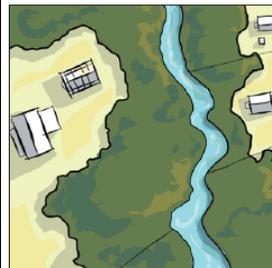
Rain gardens can be added around homes and businesses to reduce and treat stormwater runoff.



GREEN ROOFS

A green roof is fitted with a planting medium and vegetation. A green roof reduces runoff by soaking up rainfall. It can also reduce energy costs for cooling the building.

Extensive green roofs, which have deeper soil, are more common on commercial buildings. Intensive green roofs, which have shallower soil, are more common on residential buildings.



LAND CONSERVATION

Land conservation is one way of preserving interconnected systems of open space that sustain healthy communities.

Land conservation projects begin by prioritizing areas of land for acquisition. Land or conservation easements can be bought or acquired through donation.



PERMEABLE PAVEMENT

Permeable pavements allow more rainfall to soak into the ground. Common types include pervious concrete, porous asphalt, and interlocking pavers.

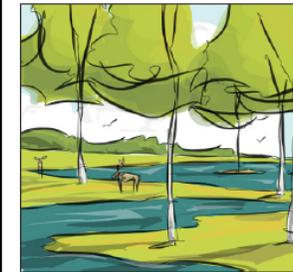
Permeable pavements are most commonly used for parking lots and roadway shoulders.



VEGETATED SWALES

A vegetated swale is a channel holding plants or mulch that treats and absorbs stormwater as it flows down a slope.

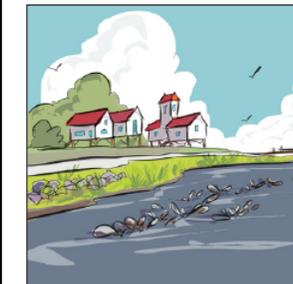
Vegetated swales can be placed along streets and in parking lots to soak up and treat their runoff, improving water quality.



WETLAND RESTORATION AND PROTECTION

Restoring and protecting wetlands can improve water quality and reduce flooding. Healthy wetlands filter, absorb, and slow runoff.

Wetlands also sustain healthy ecosystems by recharging groundwater and providing habitat for fish and wildlife.



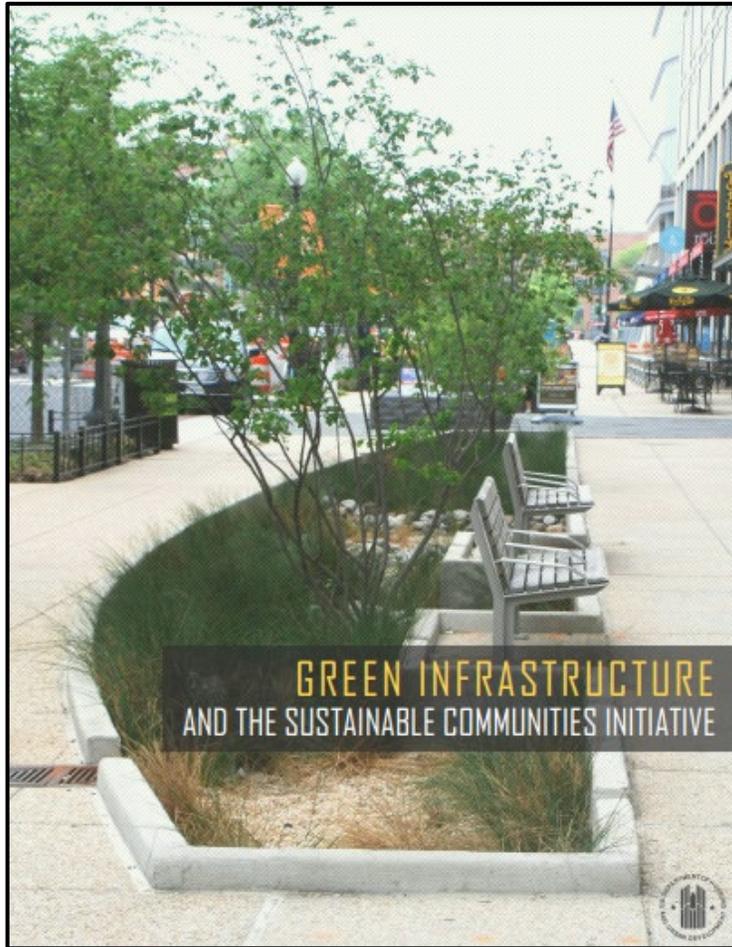
LIVING SHORELINES

Living shorelines stabilize a shore by combining living components, such as plants, with structural elements, such as rock or sand.

Living shorelines can slow waves, reduce erosion, and protect coastal property.

https://www.fema.gov/sites/default/files/documents/fema_riskmap-nature-based-solutions-guide_2021.pdf

Green Infrastructure - Resources



<https://www.hud.gov/sites/documents/GREENINFRASTRUCTSCI.PDF>

Green Infrastructure Cost-Benefit Resources

Green infrastructure can be a cost-effective approach to improve water quality and help communities stretch their infrastructure investments further by providing multiple environmental, economic and community benefits also known as the triple bottom line. On this page, learn more about how other communities have estimated the costs and benefits of their green infrastructure programs as well as the tools you can use to inform your own cost-benefit analysis.

On this page:

- [Cost Analysis](#)
- [Cost-Benefit Analysis](#)
- [Tools](#)

Cost Analysis

Decision makers commonly use cost comparison as a method to determine whether to install gray or green infrastructure. The two basic approaches to perform a cost comparison analysis address the following:

- Only initial construction costs.
- Life cycle costs, including planning, design, installation, operation and maintenance, and replacement.

Analyzing cost alone ignores the difference in performance between green infrastructure and gray infrastructure. As a result, they provide an incomplete basis for decision-making. The following publications provide a review of cost-comparison tools, case studies to demonstrate realized cost savings, and cost comparisons of conservational and conventional approaches to stormwater management practices. These resources serve as a good starting point to understand some basic differences between gray and green infrastructure.

[Urban green infrastructure: A review on valuation toolkits from an urban planning perspective](#) (EXIT) (Oijstaeijen, et. al. Journal of Environmental Management, August 2020)—This paper reviews the potential of 10 shortlisted and existing valuation tools to support investment decisions of urban green infrastructure. Making the economic case for green infrastructure remains a burden when comparing grey and green alternatives. Toolkits should be the result of co-development between the scientific community and local authorities to create toolkits that are tailored to the specific needs of the urban planning process.

<https://www.epa.gov/green-infrastructure>

BUILDING COMMUNITY RESILIENCE WITH NATURE-BASED SOLUTIONS

A GUIDE FOR LOCAL COMMUNITIES

JUNE 2021

RiskMAP
Increasing Resilience Together

https://www.fema.gov/sites/default/files/documents/fema_risk_map-nature-based-solutions-guide_2021.pdf



Retrofit Engineering: The Process

- Retrofits are prioritized in areas of identified water quality problems or flood zones.
- Options can be evaluated to determine the most appropriate measures for the site, soil conditions, topography, existing infrastructure, and community goals.
- The desired stormwater goals should be met and have minimal maintenance needs.



STORMWATER RETROFIT RESILIENCY DESIGN GUIDE Water Quality & Flood Mitigation

About This Guide

Stormwater retrofits are constructed in the existing urban environment to improve runoff quality and help mitigate flooding. Retrofits include new installations or upgrades to existing stormwater management measures where there is a lack of water quality treatment and/or management of flooding. These measures can target trash, sediment, nutrients, bacteria, or other concerns. Often, retrofits can be completed in tandem with other capital projects including roads, parks, and downtown revitalization efforts to achieve multiple benefits and manage cost. This document provides concise guidance on how to plan for, identify, locate, design, construct and maintain retrofit projects.

Retrofit Engineering: The Process

Retrofits are prioritized in areas of identified water quality problems or flood zones, then, multiple retrofit options can be evaluated to determine the most appropriate measures for the site, soil conditions, topography, existing infrastructure, and community goals. All retrofit sites are unique and no single solution fits all conditions. In the end, the final project should be attractive in appearance, satisfy the desired stormwater goals, and have minimal maintenance needs.



Texas General Land Office

2021 Stormwater Retrofit 1

Retrofit Techniques

Stormwater retrofits can improve water quality and reduce flood flow rates in existing urbanized areas. As noted above, one size does not fit all, potential retrofit sites are unique and in some situations only one type of solution will work while in other areas multiple solutions could function well.

Stormwater Management Measures

Stormwater Management Measures	Construction Cost	Recommended Drainage Area	Maintenance Requirement	Liability/Safety Issues	Other Benefits
Buffers	N/A	creek, river and tidal water boundaries	very low to none	none	<ul style="list-style-type: none"> Water quality and flood management Water supply and resilience
Natural Area Preservation	N/A	N/A	low	none	<ul style="list-style-type: none"> Water quality and flood management Water supply and resilience
Roof-top Disconnection	low	house and business roof-top	low	none	<ul style="list-style-type: none"> Water quality and flood management Water supply and resilience
Vegetated Filter Strip	low	<3 acres or downstream of other measures	low	none	<ul style="list-style-type: none"> Water quality Resilient
Vegetated Swale	low	<2 acres	low	low	<ul style="list-style-type: none"> Water quality Resilient
Extended Detention Basins	mod	less than 128 acres	low - med	low, short term standing water	<ul style="list-style-type: none"> Flood and water quality management Promote baseflow enhancement
Bioretention/Rain Gardens	mod	<10 acres	med - high	low, shallow standing water depth	<ul style="list-style-type: none"> Water quality Promote baseflow enhancement
Infiltration	mod	downstream of BMP	med - high	mod, standing water	<ul style="list-style-type: none"> Water quality Water supply
Rainwater Harvesting	mod	house roof-top	mod	low, rainwater stored in property owner tanks	<ul style="list-style-type: none"> Water quality Water supply
Wet Basins	mod - high	>20 acres and less than 128	med - high	high, long term standing water	<ul style="list-style-type: none"> Water quality and flood management Habitat
Constructed Wetlands	mod - high	>20 acres and less than 128	med - high	mod, longterm standing water	<ul style="list-style-type: none"> Water quality and flood management Habitat
Porous Pavement	mod - high	no off-site area drains to pavement	mod	low, potential pavement issues	<ul style="list-style-type: none"> Water quality Peak flow reduction Water supply
Water Quality Vaults on Storm Drain Systems	high	varies, typically less than 2 acres	high	limited safety issues since underground but could have moderate liability if not maintained and the storm drain system becomes clogged	<ul style="list-style-type: none"> Manage water quality at hot spots such as gas stations, industrial sites

Texas General Land Office

2021 Stormwater Retrofit 7

Developed by the Clean Coast Texas team: <https://cleancoast.texas.gov/>



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Texas General Land Office

2021 Stormwater Retrofit 7

Developed by the Clean Coast Texas team: <https://cleancoast.texas.gov/>



CDBG Mitigation Viewer: GIS Team

This interactive tool displays the Community Development Block Grant Mitigation (CDBG-MIT) Program information, including demographics, low- and moderate-income summary data, Social Vulnerability Index (SoVI), and Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).



MIT Viewer and Resources

- The Mitigation Viewer (CDR GIS Hub):
 - <https://gis-glo-cdr.hub.arcgis.com/pages/cdbg-mitigation-viewer>
- On the MIT Viewer's GLO-CDR GIS Hub page, the viewer can be opened by clicking *Explore*
- Viewer documentation is provided:
 - **User Guide** walks the user through the Screening Tool process
 - **Layer List** provides data source information for all layers in the viewer
- Contact information and link back to the Regional Mitigation Program webpage are provided

GLO - CDR GIS Hub

CDBG Mitigation Viewer

This interactive tool displays the Community Development Block Grant Mitigation (CDBG-MIT) Program information, including demographics, low- and moderate-income, Social Vulnerability Index (SoVI), and Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Application

Texas General Land Office
Community Development & Revitalization Division

CDBG-MIT Viewer

Explore

Documentation

- [CDBG-MIT Viewer User Guide](#)
- [CDBG-MIT Viewer Layer List](#)

Contact

For technical questions regarding the viewer functionality, please contact cdr.gis@recovery.texas.gov.

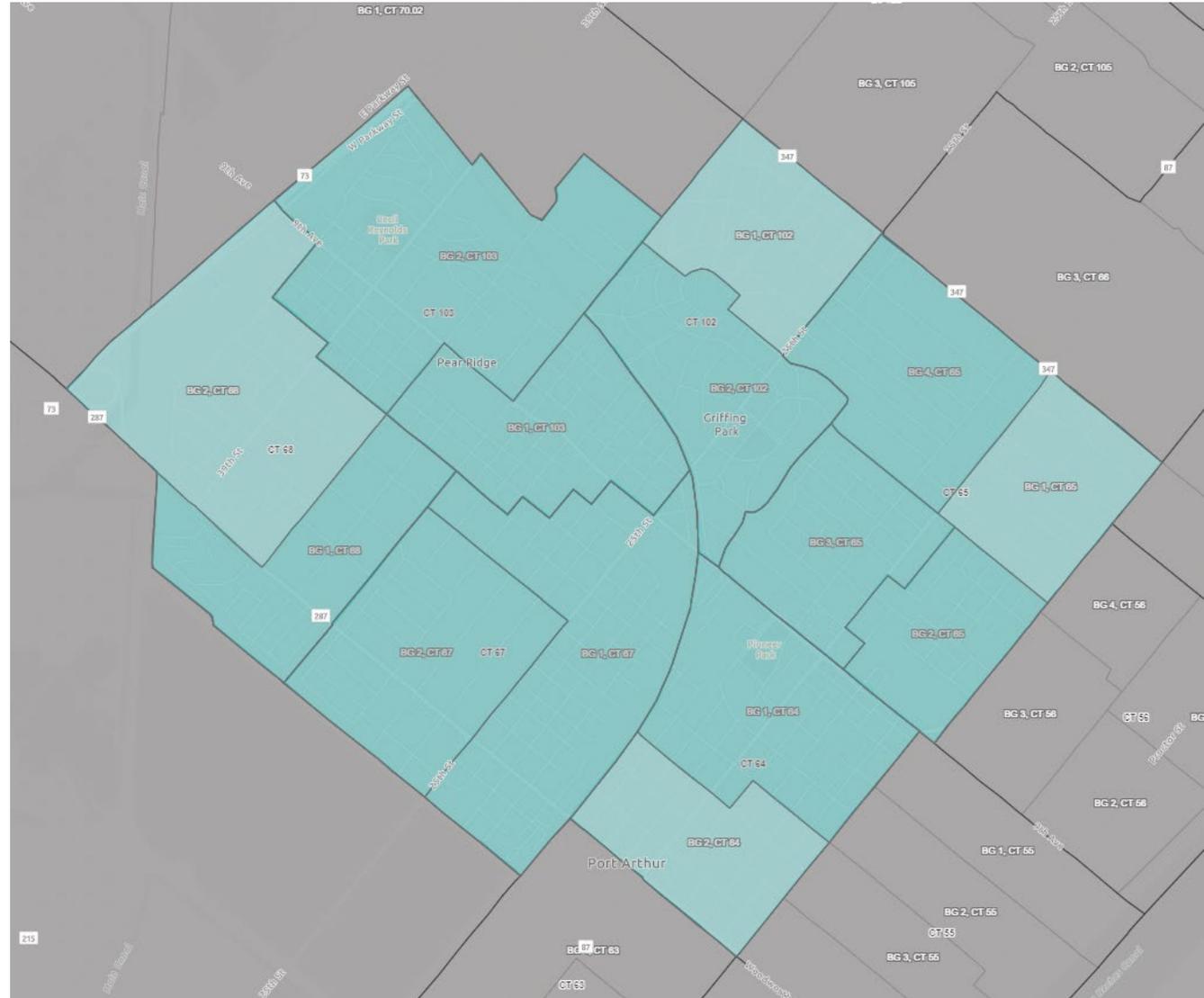
For CDBG-MIT program related questions, please contact cdr.mitigation@recovery.texas.gov.

Additional Resources

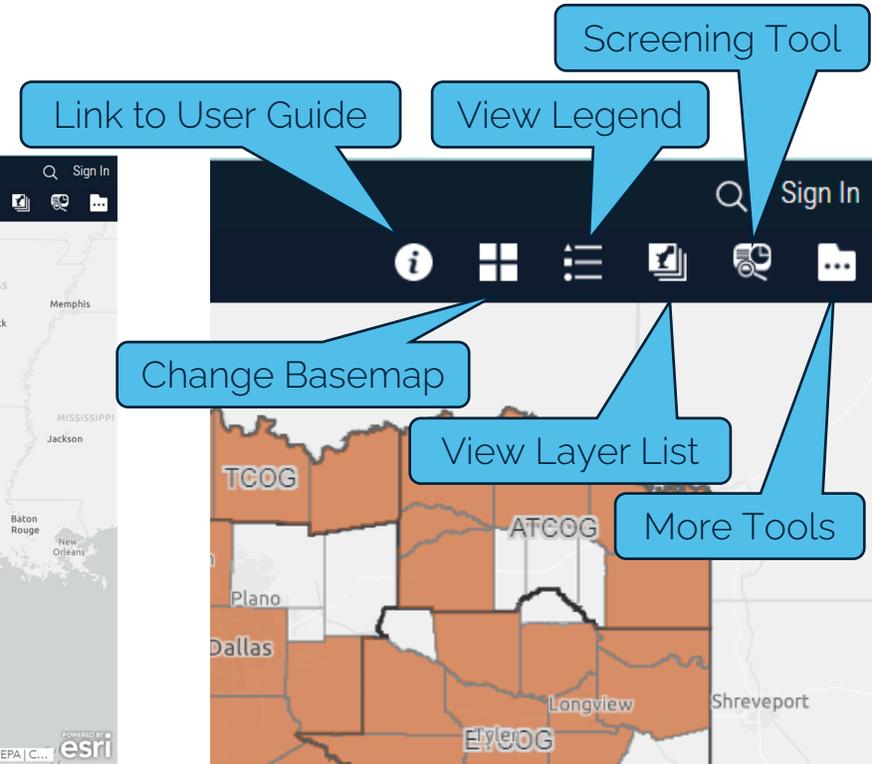
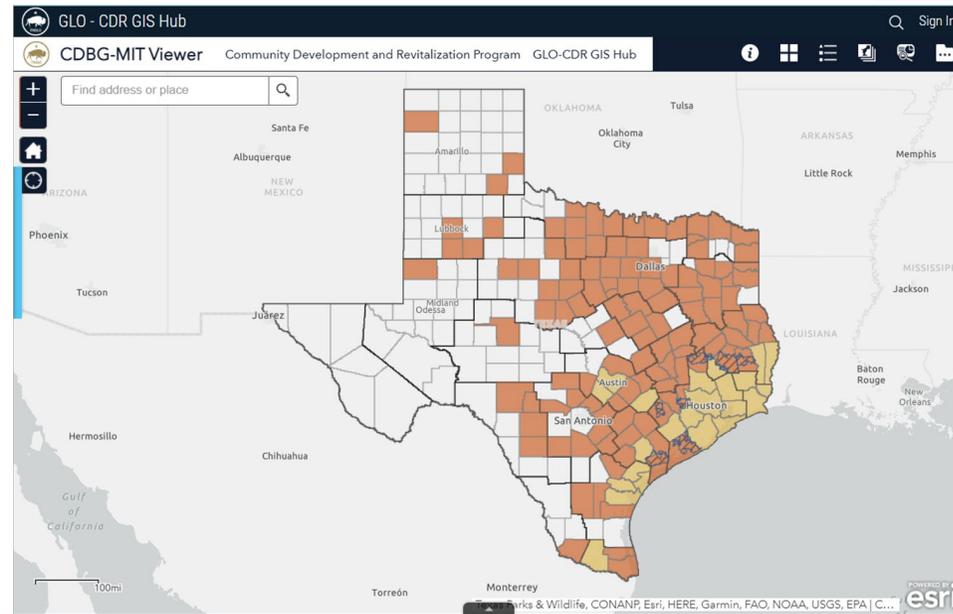
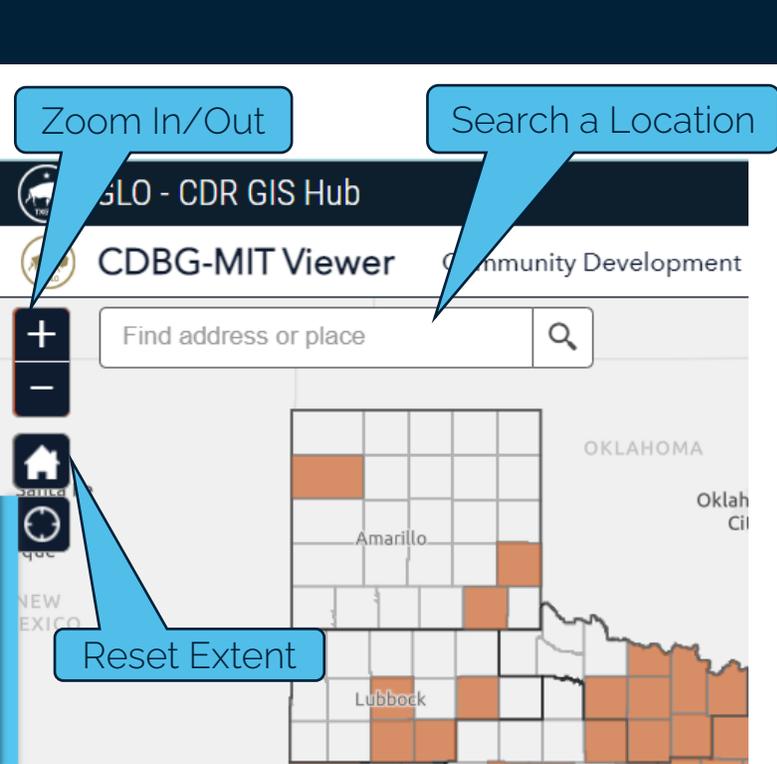
For information specific to the Regional Mitigation - Council of Governments Method of Distribution (COG MODs) Program, please visit the [Regional Mitigation Program webpage](#).

Use Case

- Looks at service area data
- Reports on data and demographics for application submittals
- Serves as a geographic tool to assess and project benefit areas

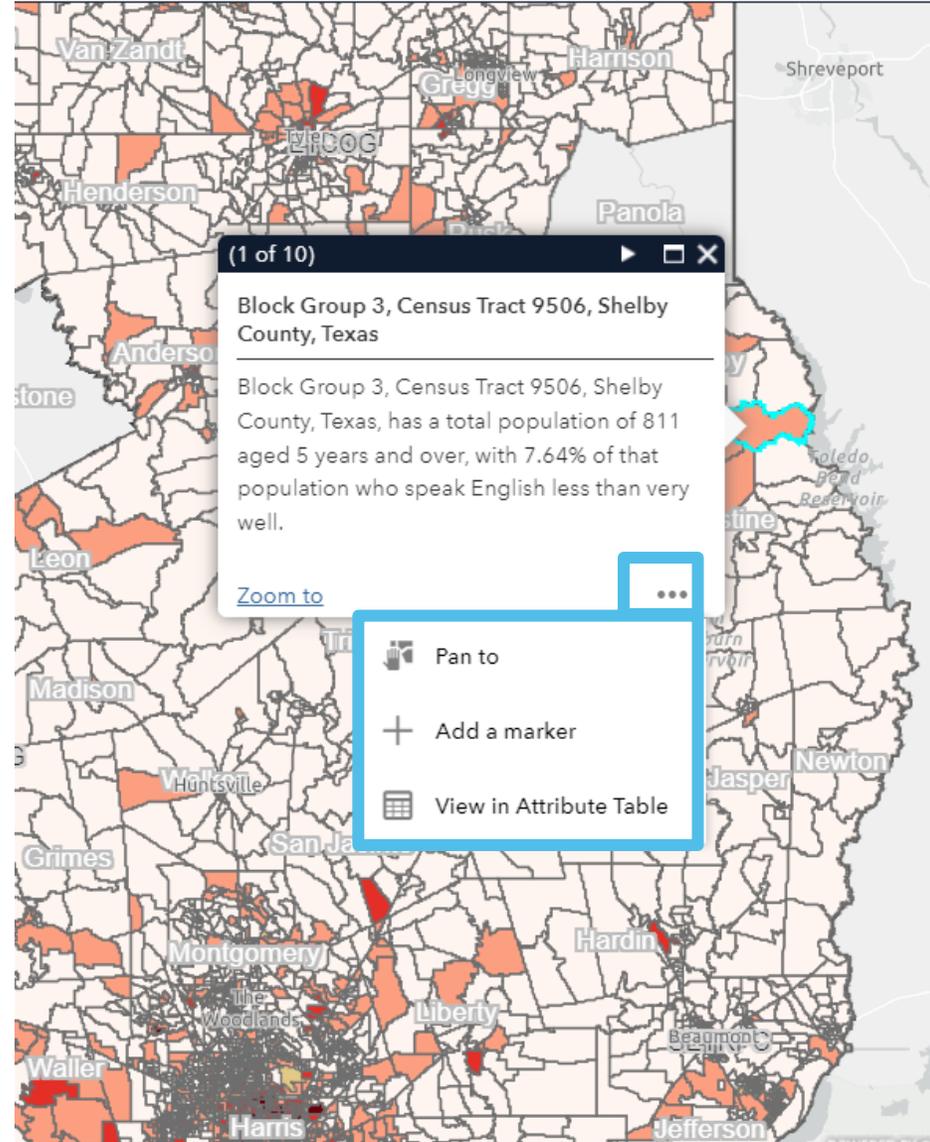


Functionality



Pop-ups & Layer List

- Click on polygons to see data pop-up displays
 - Access additional options through ellipses
- Each layer's legend can be made visible by clicking on the arrow down to the left of the layer name
- Clicking on the layer ellipses displays additional layer options
- *Tip:* If a layer appears greyed out then you must zoom in further for the layer to become visible



Layer List

Layers

- LMISD FY2021 by Block Group
- LMISD FY2021 by County
- LMISD FY2021 by Place
- Limited English Proficiency by Block Group (ACS 5YR 2020)
- Population Age 65+ (ACS 5YR 2020)
- Minority Population (ACS 2020)
- Population with a Disability (ACS 2020)
- Population in Poverty (ACS 2020)
- National Origin by Block Group (ACS 5YR 2020)
- Total Population (Male/Female) by Block Group (ACS 5YR 2020)

Percent Speak English

- Greater than 35%
- 20% - 35%
- 5% - 20%
- 0% - 5%

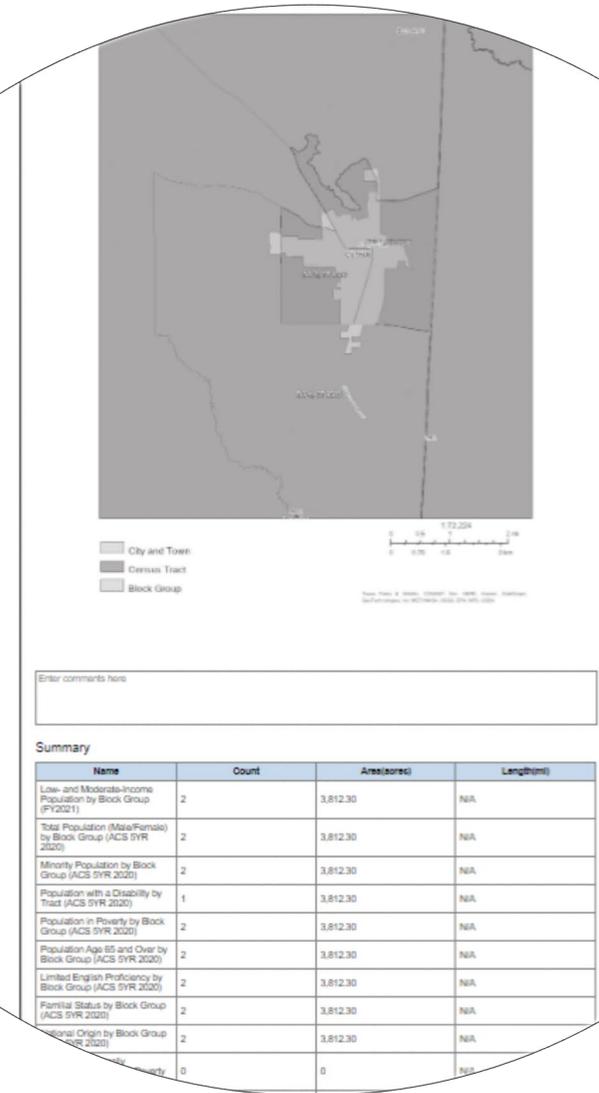
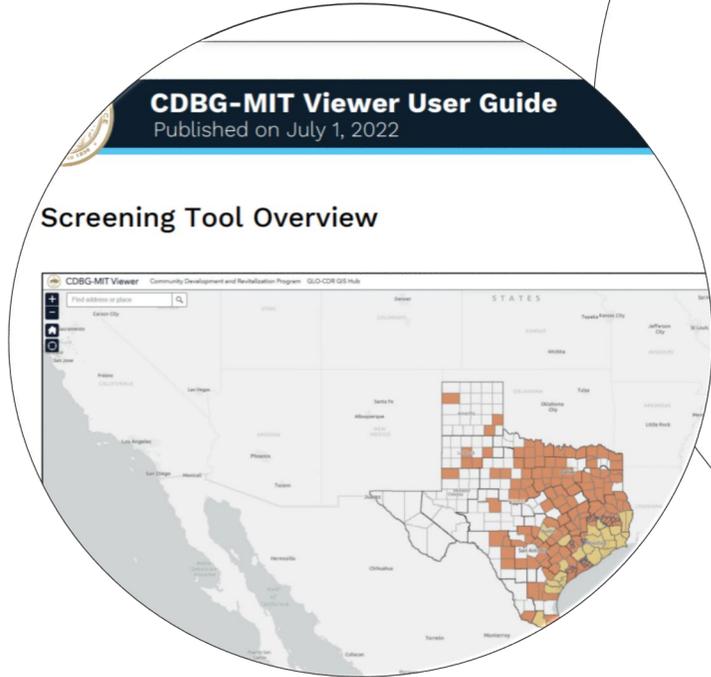
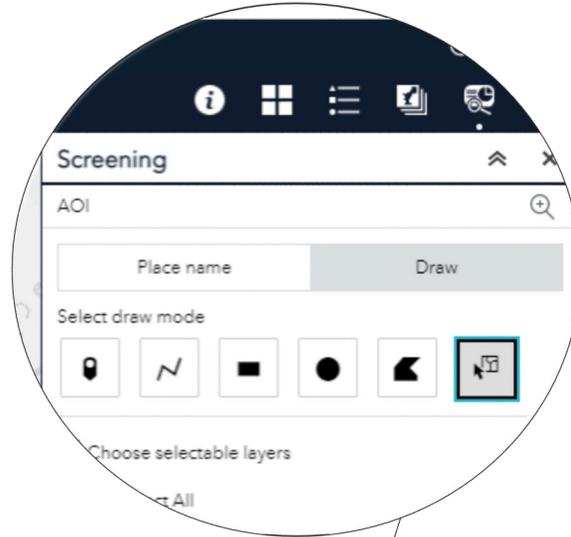
More options:

- Zoom to
- Transparency
- Set visibility range
- Disable pop-up
- Move up
- Move down
- View in Attribute Table



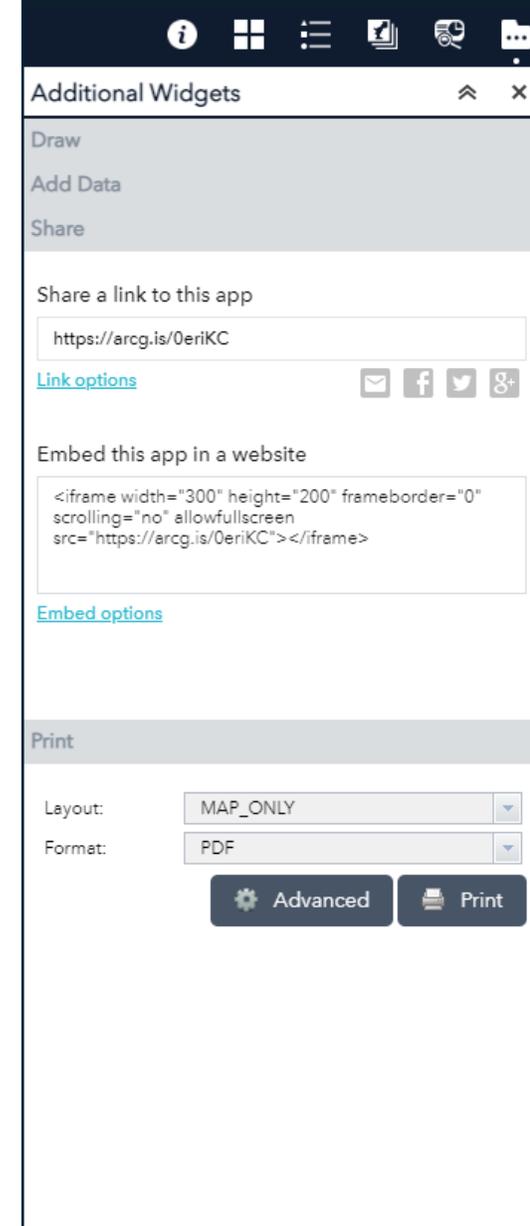
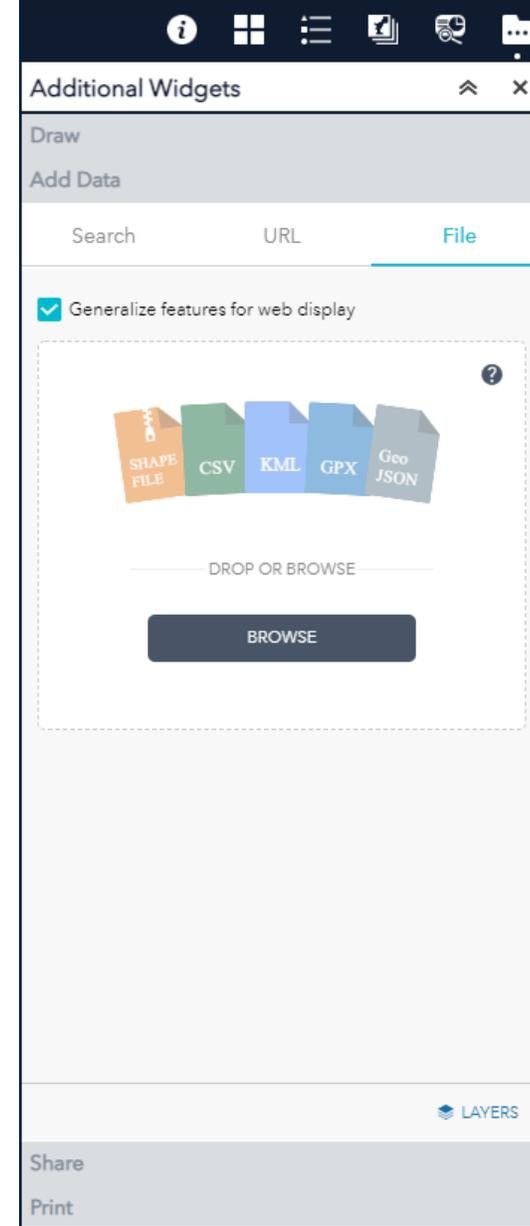
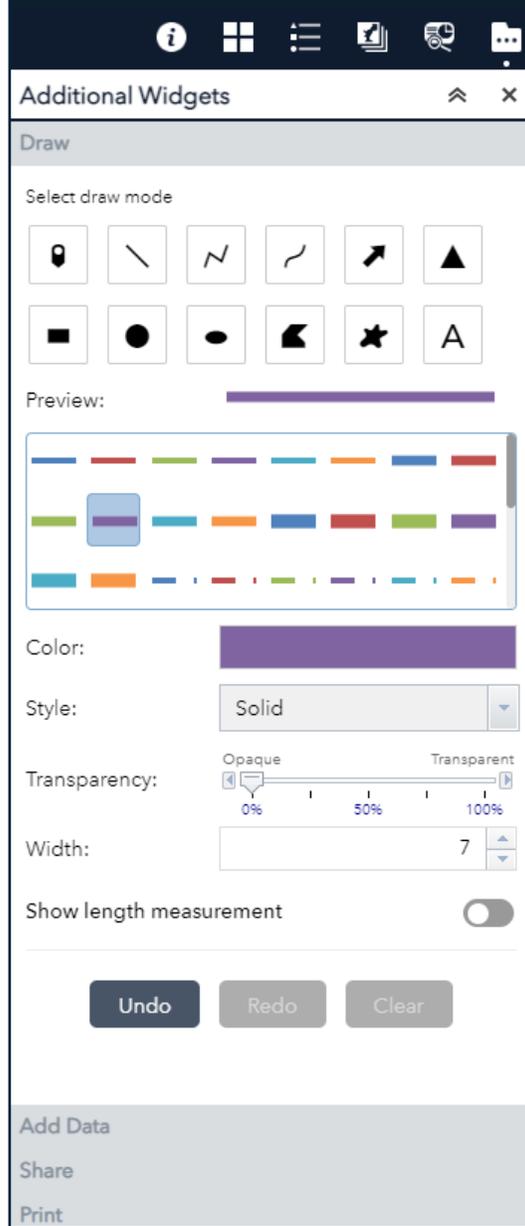
Screening Tool & User Guide

- Follow along using the **User Guide** to step by step complete the Screening Tool Process
- This guide shows the user how to **select the service area** and produce a **downloadable PDF** report as well as .csv data files



Additional Widgets

- More Tools are available in the Additional Widgets section of the viewer
 - **Draw:** Allows a variety of markers and shapes to be drawn directly on the map, which will be visible in the Screening Tool Report map and map printouts
 - **Add Data:** Search through available Esri layers, add via URL or upload a file
 - **Share:** Provides a URL to easily share the viewer
 - **Print:** Create PDF printouts of the map



Additional Viewers

- GLO-CDR GIS Hub: <https://gis-glo-cdr.hub.arcgis.com/>
- Environmental Review Mapping Application: <https://gis-glo-cdr.hub.arcgis.com/pages/environmental-review>
- Additional data and viewers being developed

Texas General Land Office Community Development & Revitalization

Geographic Information Systems (GIS) Resources

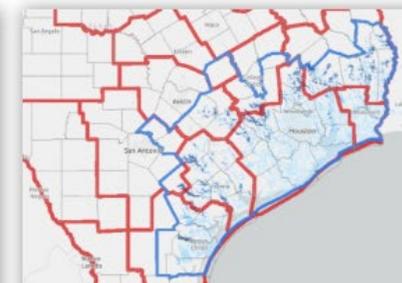
The Texas General Land Office makes no representations or warranties regarding the accuracy or completeness of the information depicted in these applications, in downloads from this page, or the data from which it was produced. These datasets ARE NOT suitable for navigational purposes and do not purport to depict or establish boundaries between private and public land. Additionally, no representations or warranties are made regarding the utility of any of the data or data representations on this page for purposes other than those stated on this page.



Environmental Review Mapping Application

This mapping application was created to provide a real time tool that can be used for reference when preparing environmental reports in accordance with.

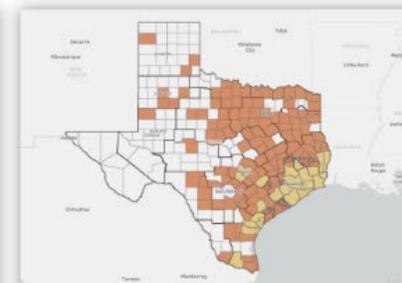
Explore



Hurricane Harvey CDBG-DR Mapping Viewer

This interactive tool displays the historical Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG-DR) Program information,...

Explore



CDBG Mitigation Viewer

This interactive tool displays the Community Development Block Grant Mitigation (CDBG-MIT) Program information, including demographics, low...

Explore

Fair Housing: Grant Management Team

- Fair Housing Definition
- Example case
- Example Fair Housing Answers



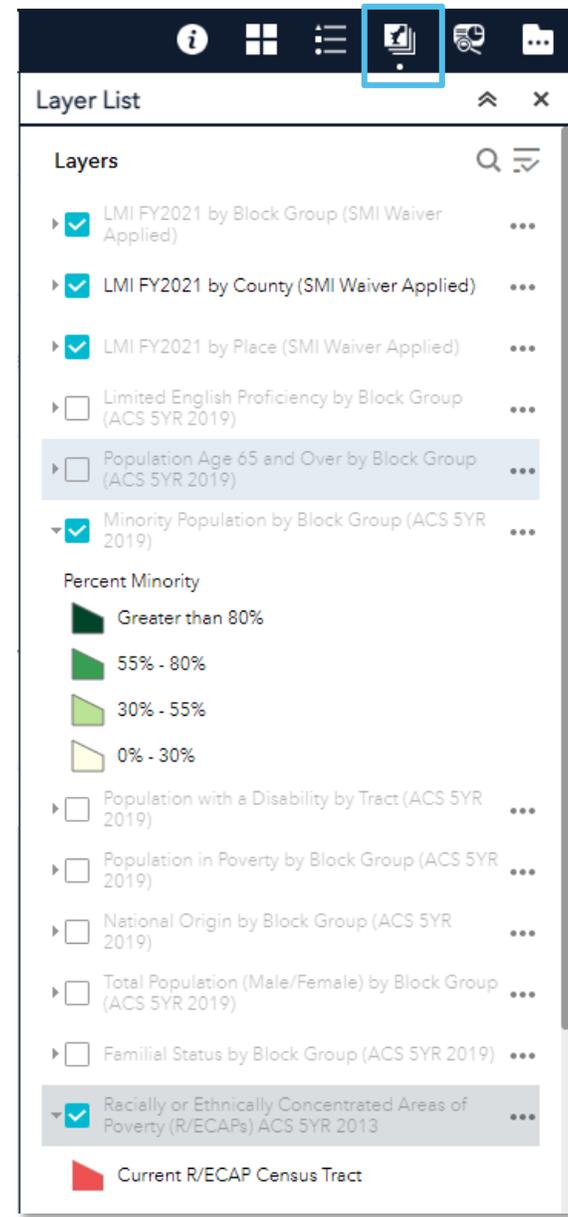
Affirmatively Furthering Fair Housing (AFFH)

- For purposes of the AFFH rule , the duty to "affirmatively further fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development.
- Applicants are required to provide a meaningful analysis that describes how identified populations may be impacted by the proposed project.



Fair Housing

- What are the identified protected classes per the AFFH rule?
- **Race, ethnicity, if the new rule is adopted it will add disability.** (not all protected classes are covered under AFFH)
- Using the MIT Viewer, a user can better understand the make up of protected classes by selecting applicable layers but race and ethnicity are the key AFFH terms

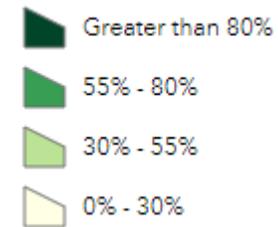


Example

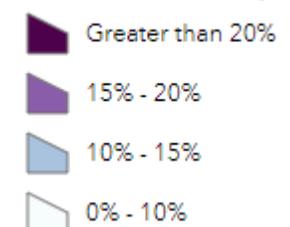
- Rango County has received a Method of Distribution allocation and has past and future threats related to riverine flooding.
- Rango County uses the Mitigation Viewer to better understand the overall demographics of the county.
- Through this analysis the County better understands the concentration of racial and ethnic minorities within the County. Note: Rango has no established Racial and Ethnic Concentration of Poverty (R/ECAP)



Percent Minority



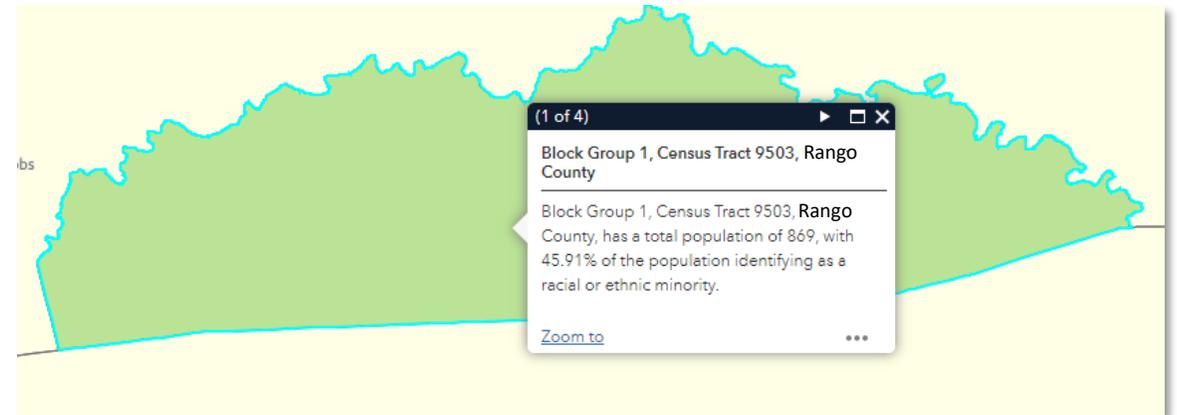
Percent with a disability



Current R/ECAP Census Tract

Example

- Now that Rango County better understands the concentration of minorities within the County, they look for the effects of riverine flooding that have occurred in the past.
- Rango County has one watershed that intersects the County and happens to fall within an area where 45.91% of individuals are reported to be of racial or ethnic minority.



Example Response

What methods and criteria were used to prioritize the projects in the application, including affirmatively furthering fair housing?

Using the Mitigation Viewer, Rango County has analyzed the demographics of protected classes. Within the County, there are three primary areas of protected classes. The City of Rango makes up two block groups (CT 9504.00 BG 2 & 4) where the reported ethnic and minority population is between 55% or greater. Another is a large area within the central part of the County, CT 9503.00 BG 1, in which 45.91% of individuals are reported to be of racial or ethnic minority. The remainder of the County reports areas that are 0-30 % of reported racial or ethnic minority.

Due to the known risks, the County has prioritized a flood protection project located in CT 9503.00 BG 1 to better protect individuals that have been affected by riverine flooding. The other areas of ethnic and minority populations were reviewed and due to no known riverine flooding impacts, the County has prioritized this project. In addition, other areas of interest have been addressed through previous CDBG funding to address localized flooding.



Example Response

What are the identified protected classes, racially and ethnically concentrated areas, and concentrated areas of poverty that may be impacted by this project?

The proposed flood and drainage improvement will impact CT 9503.00 BG 1, in which 45.91% of individuals are reported to be of racial or ethnic minority.

Example Response

Provide a meaningful analysis that describes how these identified populations may be impacted by this project?

The proposed flood and drainage project within CT 9503.00 BG 1 will mitigate future impacts that have impacted this population. By creating interment detention areas along the riverbank, the individuals residing in this service area will be better protected by future river flooding events.

Fair Housing

- Every jurisdiction that has a R/ECAP (50% race and/or ethnicity in a census tract and 40% concentration of poverty) have the responsibility for looking at ways to improve the area and/or provide a meaningful option for residents to move to areas of opportunity.
- For example:
 - The R/ECAP is City of Rango
 - Rango is within Rango County
 - Rango County is in RANCOG

Each of these groups has a responsibility to work together with their funds to assist the R/ECAP in helping areas in this category before other projects are funded.



Fair Housing

- AFFH meaningful analysis must include a detailed review of a jurisdiction's racial and ethnic populations and placing a priority on those areas even when there is not a R/ECAP present.
- HUD considers AFFH to be a process of removing intentional or unintentional historical discrimination.
- In 2021, HUD reverted to the 2015 AFFH Final Rule except for the planning reports—but planning may be returning under the new Equity Plan in the proposed AFFH Rule.



Section Recaps

- Section summaries
 - Application
 - Quickbase
 - Procurement
 - Environmental Regulations
 - CDBG Mitigation Viewer
 - Fair Housing



Application Section Recap

- Application resources can be found on the [Regional Mitigation section of the recovery website](#), including the Beneficiary Determination tools.

Construction

Does the construction budget include all costs necessary to complete the project?

- Total materials in linear feet or units from the Budget Justification of Retail Costs?

Engineering

Does the engineering budget include all costs necessary to complete the project?

- Permitting costs
- Required hydrology work
- Required design work

Engineering is capped at 15% of construction costs

Acquisition

Does the acquisition budget include all costs necessary to complete the project?

- Total parcel costs
- Appraisal costs
- Notification to owner costs

Environmental and Grant Administration

TABLE 3: CDBG-MIT PROJECT CAPS

Total CDBG-MIT Award (Non-Housing Activities)	Percentage Cap
\$249,999.99 or less	13%
\$250,000-\$749,999.99	11%
\$750,000-\$999,999.99	10%
\$1 million-\$24,999,999.99	8%
\$25 million or over	6%

Quickbase Section Recap

- Register and access the QuickBase Portal under [the Regional Mitigation Program section](#) of the recovery.texas.gov website.
- Any questions about registering for the application process or the application itself, please contact cdr.mitigation@recovery.texas.gov



Procurement Section Recap

- Review your procurement and purchasing policies and procedures for changes to 2 CFR regulations (November 12, 2020).
 - 2 CFR 200.322: Domestic Preference
 - 2 CFR 200.216: Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment
- For all competitive procurements, document an Independent Cost Estimate (ICE), Cost Analysis, and Profit Negotiation.
- For all non-competitive procurements including sealed bids that only receive one bidder, maintain documentation for exemption.



Environmental Section Recap 1/2

- As a “subrecipient”, if you are a unit of general local government such as a town, city, county, Indian tribe, or the State, you will assume the role of the Responsible Entity, or “RE” (Responsible Entity). The RE is responsible for the environmental review, decision-making, and action pertaining to the project.
- A Critical Action project located in the 100 and 500-year floodplain must be designed to include elevation and/or floodproofing, to the current FEMA requirements, with a signed and sealed design plan from the project engineer. HUD financial assistance is prohibited for critical actions in floodways or coastal high hazard areas. HUD requires you to verify floodplains and coastal areas with FEMA effective and preliminary flood maps. The most stringent of the two will need to be used.



Environmental Section Recap 2/2

- Financial assistance is prohibited in floodways unless an exception in the HUD Floodplain regulation applies, or the project is a functionally dependent use (e.g., dams, marinas, and port facilities) or a floodplain function restoration activity.
- Because of the increased risks associated with V Zones, HUD prohibits new construction in these coastal areas unless an exception applies, or the project is a functionally dependent use and otherwise requires a project to be designed for location in a coastal high-hazard area.
- The project proponent has to utilize the most stringent of the available FEMA Flood Insurance Rate Maps, also known as FIRM, for HUD Floodplain compliance. That would include the effective and preliminary if available, FIRM. Once the project site has been overlain with the appropriate FEMA floodplain map, the Responsible Party could assess whether the proposed project qualifies for HUD assistance.



Mitigation Viewer Section Recap

- For Geographic Information Systems (GIS) tools and resources for your Mitigation COG MOD, be sure to review the [mitigation viewer](#).
- Follow the [CDBG-MIT Viewer User Guide](#) for instructions on how to develop your beneficiaries and demographics report using the Screening Tool for local downloading and subsequent uploading to the your Quickbase application.
- Reach out to the CDR GIS Team with any questions or issues: cdr.gis@recovery.texas.gov



AFFH Section Recap

- AFFH meaningful analysis must include a detailed review of a jurisdiction's racial and ethnic populations and placing a priority on those areas even when there is not a R/ECAP present.
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- In 2021, HUD reverted to the 2015 AFFH Final Rule except for the planning reports—but planning may be returning under the new Equity Plan in the proposed AFFH Rule.



QUESTIONS?

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COMMUNITY DEVELOPMENT AND REVITALIZATION

