



TEXAS GENERAL LAND OFFICE  
GEORGE P. BUSH, COMMISSIONER

October 5, 2022

Jim Reed, Executive Director  
Central Texas Council of Governments  
2180 N. Main Street  
Belton, TX 76513

Re: Central Texas Council of Governments (CTCOG) CDBG-MIT Regional Mitigation Program Method of Distribution (MOD) Approval

Mr. Reed:

The Texas General Land Office (GLO) Community Development and Revitalization division (GLO-CDR) is approving the CTCOG Mitigation Method of Distribution (MOD). The MOD delivered to the GLO was initially submitted September 15, 2022, underwent review by GLO staff, and was submitted a final time with corrections made on September 20, 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](mailto: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

**Texas General Land Office**

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



Delivered to the GLO: 9/15/22 & 9/20/22

Approved by the GLO: 10/5/22

**Council of Governments:** Central Texas Council of Governments

**Allocation Calculation Sheet Packet Page Number:** \_\_\_\_\_

**HUD MID and State MID Allocations**

HUD MID Total	N/A
State MID Total	\$6,769,000
<b>Grand Total COG Allocation</b>	\$6,769,000

Table 1

**Funding Limits**

<i>Minimum Amount Waiver Requested</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Minimum Amount	1,000,000	
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.

The program will help create projects for risk mitigation in both Coryell and Milam counties. Due to Hurricane Harvey and the 2015-2016 storms, extensive flooding took place causing widespread damage throughout the respective counties. As a results of the damage to the counties of Milam and Coryell, CTCOG is choosing to directly allocate to these entities. These projects will help the counties' mitigation efforts for such hazards and reduce the potential impact of future flooding events, tropical storms, and hurricanes. Allocating directly to the counties furthers the regional mitigation priorities and results in a more comprehensive mitigation strategy. This funding will provide hazard mitigation projects which will prevent future flooding and damage to infrastructure and communities throughout the counties. This preparation will in turn save lives and money, creating community resiliency.

Table 3

## Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Eligible county for this program.	100%		CTCOG staff proposed an equal distribution of funds to accommodate for county level, regional mitigation projects.

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.		
<b>-OR-</b>			
<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.

CTCOG's strategic plan to meet the minimum 50% low- and moderate-income populations begins with our data selections and weights. LMI % is weighted at 50% in the allocation worksheet. Therefore, 50% of the allocation are focused on serving the economically distressed areas that are 51% or more LMI households or benefit households with incomes below 80% of the Area median Income (AMI). 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.

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):	Coryell County 2/17/2022 12:00PM & 6:00 PM Milam County 3/22/2022 12:00 PM & 6:00 PM	Coryell County 8/2/2022 12:00PM & 6:00 PM Milam County 8/3/2022 12:00 PM & 6:00 PM
Location(s):	Gatesville Council Chambers, 110 N 8th Street, Gatesville, TX 76528 Milam County Courthouse, 102 S Fannin Ave, Cameron, TX 76520	Gatesville Council Chambers, 110 N 8th Street, Gatesville, TX 76528 Milam County Annex, 806 N. Crockett, Cameron, TX 76520
Total Attendance:	Coryell:4 Milam:3	Coryell:1 Milam:6

Table 10

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

Method	Public Planning Meeting	MOD Public Hearing
	Date(s) Sent	Date(s) Sent
<input checked="" type="checkbox"/> Email	Emails process began for Coryell County February 9, 2022 and completed February 10, 2022 Emails for Milam County were sent out on March 14, 2022	July 27, 2022
<input checked="" type="checkbox"/> Fax	One fax sent out for Milam County on March 14, 2022	One fax sent out for Milam County on July 27, 2022
<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:

<b>Website Notice</b>	<b>Public Planning Meeting</b>	<b>MOD Public Hearing</b>
Date(s)	February 9, 2022	July 26, 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):

<b>Newspaper Name</b>	<b>Public Planning Meeting</b>	<b>MOD Public Hearing</b>
	Date Published	Date Published
Copperas Cove Leader-Press	February 11, 2022	July 29, 2022
The Gatesville Messenger	February 12, 2022	July 30, 2022
Rockdale Reporter	March 17, 2022	July 29, 2022
The Cameron Herald	March 17, 2022	July 28, 2022

Table 13

**Public Comment Period**

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

Start Date:	July 28, 2022	End Date:	August 11, 2022	No. of Days:	15
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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.

Prior to development of this Method of Distribution, CTCOG conducted public planning meetings in Cameron, at the Milam County Courthouse, and Gatesville, at the Gatesville Council Chambers. Comments were also accepted by mail, email, or fax. A Solicitation of Public Comment notice was published in English and Spanish in the Cameron Herald, Rockdale Reporter, Copperas Cove Leader-Press, and the Gatesville Messenger newspaper. Notices were sent to the County Judges and County Emergency Management Coordinators for Milam and Coryell Counties and the notices were posted publicly in the same location that meetings of the County Commissioners Court/Council Chambers are posted. The notices were posted at the CTCOG office in an area that is available for public viewing 24 hours a day. The notices were also posted on CTCOG's website. Notices were also emailed to identified impacted individuals. Following the first public hearing CTCOG drafted this document with insight and feedback that had been provided to the COG. In addition to the initial public hearing for input regarding the development of the MOD, once the draft MOD was posted, a public comment period of 14 days, 5/2/2022-5/16/2022, was open. During this period there was a second public hearing, on the 3rd of May at the Milam County Courthouse and the 4th of May Gatesville Council Chambers from 12pm-1pm, for the public to provide any additional feedback on the draft MOD. Similar to the Preliminary MOD process, Public Hearings were held in each county twice each day, as well as a published open comment period from 7/27/2022-8/11/2022.

Table 15

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

The COG will include information in all of the public hearing information about accommodations for those with disabilities and those with Limited English Proficiency. The facilities at the COG are ADA compliant. The COG will provide reasonable accommodations for those that request assistance at least 48 hours in advance. This can be done by calling 254-770-2365 or emailing [jesse.hennage@ctcog.org](mailto:jesse.hennage@ctcog.org). The COG will also work with local agencies that work with those with disabilities to help find the best ways to market the public sessions.

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:	Jesse Hennage
Title:	Assistant Director of Planning/Public Safety

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.

DocuSigned by:

*Jim Reed*

9/15/2022

9A28DF68BD25443...  
Signature

Date

Jim Reed

CTCOG Executive Director

Printed Name

Title

jim.reed@ctcog.org

(254) 770-2236

Email Address

Telephone Number

COG: **Central Texas Council of Governments**

Total Allocation: **\$6,769,000**

<b>State MID</b>				
<b>Entity</b>	<b>Allocation</b>	<b>Percentage of Total Allocation</b>	<b>LMI Portion</b>	<b>LMI Percentage</b>
Milam	\$3,384,500.00	50.00%	\$1,692,250.00	50.00%
Coryell	\$3,384,500.00	50.00%	\$1,692,250.00	50.00%
<b>Total</b>	<b>\$6,769,000.00</b>	<b>100.00%</b>	<b>\$3,384,500.00</b>	<b>100.00%</b>
<b>Calculation</b>				
<b>Entity</b>	<b>Equal Share of Total Allocation (1/2 * Total Allocation)</b>			
Milam County	\$3,384,500.00			
Coryell County	\$3,384,500.00			
<b>Total:</b>	<b>\$6,769,000.00</b>			



**RESOLUTION AUTHORIZING Final Method of Distribution for Milam and  
Coryell County General Land Office Mitigation Projects**

**09-22-PRS07**

**WHEREAS**, the Central Texas Council of Governments (CTCOG) Executive Committee, a Regional Planning Commission designated by the Office of the Governor, State of Texas, under the provisions of Article 1011mm, V.A.C.S., with jurisdictional lines encompassing the counties of Bell, Coryell, Hamilton, Lampasas, Milam, Mills and San Saba, is desirous of approving the final Method of Distribution (MOD) which will allow Milam and Coryell County the ability to apply for mitigation projects through the General Land Office (GLO). The Central Texas Council of Governments finds it in the best interest of the citizens of the CTCOG's seven county region, that the MOD is approved for submission to the GLO; and

**WHEREAS**, the governing body of the Central Texas Council of Governments finds that the final MOD will serve to implement the goals, objectives, and recommendations of CTCOG staff, general public, and local jurisdictions within Milam and Coryell County.

**WHEREAS**, the Executive Committee of Central Texas Council of Governments has reviewed and agrees with the contents of the final Method of Distribution to be approved by the GLO;

**NOW, THEREFORE, BE IT RESOLVED** that the Method of Distribution has been approved:

**PASSED AND APPROVED** at a regular meeting of the Central Texas Council of Governments, this the 08<sup>th</sup> day of September 2022.

The Honorable David Blackburn, President

The Honorable Roger Miller, Secretary/Treasurer

<b>Funding Acknowledgment Summary</b>	
<b>County</b>	<b>Accepted Y/N</b>
Coryell County	Yes
Milam County	Yes



## **Minutes**

- Budd Johnson, Administrator of the Coryell County Preparedness Hub, and Alex Swift, GLO, were the only attendees (both virtual). Jesse Hennage went through the agenda with Budd and Alex.

## **Comments**

- Budd said he was asking for a lady within the county, her question was: How were the funds distributed during the previous GLO distribution.
- CTCOG Response: Jesse explained that Coryell County did not receive funds in the last round. Alex explained that for Milam County, there was a scoring process and the funds were competitive however, this time they would not be using that process.



## **Minutes**

- No one in attendance

## **Comments**

- No comments made

## **Responses to Comments**

- No responses



## Minutes

- The following people were in attendance:
  - Amy Dohnalik Granados, Rockdale Housing Authority
  - Linda Thompson, Rockdale Housing Authority
  - Mario Casarez, Rockdale Housing Authority
  - Brett Boren, Rockdale Mayor
  - Julia Cordona, Workforce Solutions/Rockdale ISD Schoolboard Trustee (virtual)
  - Ricky Tow, City of Cameron City Manager (virtual)
  - Alex Swift, GLO (virtual)
- Jesse went through the agenda and asked for any comments from attendees.

## Comments/Response

- Amy stated there is a constant flow of people needing housing, many of which are currently homeless, and there aren't enough units available for them. She continued that flood mitigation projects would allow for repairs to be made to existing units, by preventing future flooding less damage would equate to more livable units. She also mentioned she would like to see more activities and housing created outside of the known flood plains.
- CTCOG Response: Jesse responded that this same mitigation project was previously mentioned by Mario in the Public Comment meeting along with supporting documentation. He stated it would be addressed again in the Public Hearing comments.
- Linda stated for the past our years, there has been zero vacancy for available housing units. She suggested mitigation projects such as drainage would help preserve existing units and prevent damage to units currently needing repair due to water damage. This would allow for more available units and quicker turnaround time.
- CTCOG Response: Jesse reiterated that these were they types of projects the Housing Authority needed to concentrate on. He emphasized when creating projects and/or providing additional documentation, it is important to focus on the mitigation activity and how it could potentially assist in creating the additional units needed.
- Mario agreed with the two ladies and said he would send me the latest Physical Needs Assessment.
- CTCOG Response: Jesse ensured Mario had the contact information needed to send Jesse the Physical Needs Assessment.
- Mayor Boren said he had been Mayor for 21/2 months but said he could see the need for more housing and shelters for the homeless problem they are experiencing. He stated affordable housing is difficult to find and that Rockdale is a hub for new growth being so close to Houston.
- CTCOG Response: Jesse stated the need for additional housing was well established and that Mario was working diligently on having Rockdale Housing Authority Projects considered for Milam County's portion of the MOD.
- Julia mentioned the need to expand housing and that she would send additional comments via email. She then asked if flooding from a large freeze would qualify as a mitigation project.
- CTCOG Response: Jesse ensured Julia had the contact information needed to send Jesse the comments.
- Mario stated he would like to see a new public facility, or shelter, for those who needed shelter from a flood or loss of their home due to flooding. He also made a point that this funding originates from HUD funding and housing projects should be funded. He finished by stating they are only requesting \$190,000.
- CTCOG Response: Jesse asked Mario if all of these projects were mentioned in previous



- supporting documents and in the Physical Needs Assessment. Mario said they were and that he would send the assessment in a few days.



## **Minutes**

- In attendance was Ricky Tow, City of Cameron City Manager. Alex Swift from the GLO was present virtually. Ricky attended the noon session virtually, but missed the first portion of the meeting and wanted to attend again to make sure he received all of the information. Jesse went through the agenda and explained the process of the GLO MOD and what to expect moving forward. Mr. Tow didn't have any questions, but stated he would send comments via email.

## **Comments**

- No comments made

## **Responses to Comments**

- No responses



**Notation of Updates made to the MOD in Response to Public Comments**

- Comments received by Mario Casarez, Rockdale Housing Authority, 8/5/2022
- These comments were reviewed and considered prior to submission of final MOD to the GLO
- CTCOG response to comments: Informed Mr. Casarez that his documentation was received and would be added to the Final MOD submission. Jesse also reiterated that final mitigation project approval would be at the discretion of the Milam County Judge's Office.

Attached is the Professional Assessment we had done by a certified architect. He uses driveways as the same as streets. He also said we need sidewalks redone as well. The streets, driveways and sidewalks have had a lot of flooding in the past. (His estimate is below.)

I would like to add that part of the mitigation is to 'relocate families outside of floodplains'. I feel what we to do by adding housing and a general facility shelter will help mitigate the issue.

Sincerely,

***Mario Casarez***

***Executive Director***

***Rockdale Housing Authority***

***100 Cordova Dr.***

***Rockdale, TX 76567***

***512-446-4180***

(letter from Architect below)

Mario,

Still recovering from COVID.

It is hard to tell because of the price volatility. What I suggest doing is to ask for between 50-100,000 for each.

So you can ASK FOR BETWEEN 150-200,000.

If you have any left, use it for miscellaneous items. If not enough, you can fill in with Capital Funds.



Bill Tamminga

William Tamminga Architects

**From:** William Tamminga <[btamminga@austin.rr.com](mailto:btamminga@austin.rr.com)>

Mario

Still recovering.

It is hard to tell because of the price volatility. What I suggest doing is to ask for between 50-100,000 for each.

So you can ASK FOR BETWEEN 150-200,000.

If you have any left, use it for miscellaneous items. If not enough, you can fill in with Capital Funds.

Bill Tamminga

William Tamminga Architects

### **Needs Assessment**

#### **All Units**

##### **Year #1**

1/3 of driveways

1/3 of sidewalks need redoing

1/3 window blinds

##### **Year #2**

¼ soffit repairs

1/3 Repair fascia

Paint all fascia

¼ HVAC replace

¼ hot water heaters replace

¼ new HVAC



All Stoves

New fridge 10%

**Year #3**

Touch up cabinets ¼

¼ Replace Countertops

No particle board in cabinets or countertops

Repoint some brick mortar 5%

Interior of storage closets need paint and texture

Facia repairs and painting

Dimples in metal front door – watch so does not get too bad

Level AC compressor pads

Paint lines on parking spaces

Missing and Broken parking stops 10

Water diverters at roof above front doors

**Year #4**

Energy Improvements:

New led lights

New light over kitchen sinks

Ceiling Fans in Bedrooms and Living room

Thermal break double Pane low e Windows currently only double pane

Low flow toilets needed

Low flow shower heads needed

Paved pads for Handicap Access

Add R7 to roof insulation

**Year #5**



Handicap ramps to code

Accessibility Improvements ramps at all front porches and doors

Paint grille on HVAC

Grille on Filter in closet - optional

Level & Paint clothesline supports

## **2 Bedrooms**

Clean overpaint at doors and windows

Repair damage to corner of slabs 10%

Replace 7 hot water heaters

## **3 bedrooms**

Paint columns at front porch

New stove 3 units

## **4 bedrooms Units-4**

Kitchen Cabinets need paint touch ups

Dumpster pad replace

Clean and Paint AC grilles

Plant Ivy under trees

Cover plates above kitchen sink replace 4

Handrails at front porch need paint

Clean and Paint AC grilles

Fix tile at thresholds

Header over front door replace or repair 2

Touch up interior door paint

Clean tub surrounds

Fix tub faucet leaks

1 unit needs new fridge



- Comments received by Ricky Tow, Cameron City Manager, 8/9/2022
- These comments were reviewed and considered prior to submission of final MOD to the GLO
- CTCOG response to comments: Informed Mr. Tow that his documentation was received and would be added to the Final MOD submission. Jesse also reiterated that final mitigation project approval would be at the discretion of the Milam County Judge's Office.

Hello Jesse,

It was great talking with you the other evening at the annex. As we talked you were asking for commits on the funding coming to the county! During our talk I mentioned GENERATORS, the City applied for funding thru hazard mitigation would these funds you talked about be able to apply to the City's match (our 20%) needed to fund the project if awarded? Attached is a little info on what we said they would help with.

Ricky Tow

City Manager



City of Cameron

100 S. Houston Avenue

P. O. Box 833

Cameron, Texas 76520

P. 254-697-6646

F. 254-697-3040

[www.camerontexas.net](http://www.camerontexas.net)

<b>Proposed Action:</b>	Hardening of critical facilities and lift stations to include installation of generators and other measures necessary to ensure continuous operation.
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**BACKGROUND INFORMATION**

<b>Site and Location:</b>	WWTP, lift stations, public buildings, other facilities throughout the City
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<b>Risk Reduction Benefit</b> ( <i>Current Cost/Losses Avoided</i> ):	Ensure continuous operation of critical facilities to reduce environmental impacts due to failure to function, reduce threat to public health and safety.
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<b>Type of Action:</b> ( <i>Local Plans and Regulations, Structure and Infrastructure Projects, Natural Systems Protection, or Education and Awareness</i> )	Structure and Infrastructure
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**MITIGATION ACTION DETAILS**

<b>Hazard(s) Addressed:</b>	Flood, Winter Storm, Thunderstorm, Wind
<b>Effect on new/existing buildings:</b>	Reduce risk to existing and future structures
<b>Priority (High, Moderate, Low):</b>	High
<b>Estimated Cost:</b>	\$2,000,000
<b>Potential Funding Sources:</b>	FEMA, HMGP, GLO
<b>Lead Agency/Department Responsible:</b>	City, Approved Contractor
<b>Implementation Schedule:</b>	Start within 12 – 24 months of plan adoption pending available funding
<b>Incorporation into Existing Plans:</b>	Existing Infrastructure/CIP

**COMMENTS:**

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**ADDITIONAL CONSIDERATIONS:** *(Rate action as indicated below)*  
The following STAPLEE criteria were evaluated on a scale of 1 to 5 indicating the extent to which this action satisfies each consideration. (1= Does Not Satisfy 3 = Moderately Satisfies 5 = Strongly Satisfies)

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Socially Acceptable = ; Technically Feasible = ; Administratively Possible = ; Politically Acceptable = ; Legal = ; Economically Sound = ; and Environmentally Sound =



- Below are comments received by Meg Duffy, Texas Appleseed, 8/11/2022
- Please see “CTCOG Preliminary Method of Distribution August 2022” attachment in packet
- These comments were reviewed and considered prior to submission of final MOD to the GLO
- CTCOG response to comments by section:
  - **I.** During previous allocations, Coryell County was not considered eligible for funding, therefore they were not a part of the \$27 million distribution of funds. During meetings with County Judges and CTCOG staff, it was determined that a 50/50 split between two participating counties and the 2021 funds was the most appropriate action to take.
  - **II.** CTCOG staff did not elect to limit subrecipients for what eligible activities are to be prioritized. Public comments and discussions with county leadership produced project ideas which include infrastructure repair and mitigation projects such as low water crossings, roads, sewage & water improvements, and generators.
  - **III.** All Public meeting, Public Hearing, and Public Comment Period requirements outlined by the GLO were met to standard.

Dear Mr. Hennage,

I have attached a public comment on the CTCOG CDBG-MIT Preliminary MOD to this email on behalf of the Texas Appleseed team. Please do not hesitate to contact me if you have any questions or would like to discuss it further.

--

Meg Duffy

Policy Analyst  
Disaster Recovery and Fair Housing Project  
[Texas Appleseed](#)  
*she/her*  
737-900-9439

August 11, 2022

Jesse Hennage

Assistant Director of Planning and Public Safety

Central Texas Council of Governments

2180 North Main Street, P.O. Box 729,

Belton, Texas, 76513

via email to [jesse.hennage@ctcog.org](mailto:jesse.hennage@ctcog.org).

**Texas Appleseed Comments on the Central Texas Council of Government (CTCOG)  
Preliminary Method of Distribution for Community Development Block Grant - Mitigation  
(CDBG-MIT) Regional Mitigation Funds**

Dear Mr. Hennage:

Thank you for the opportunity to comment on Milam and Coryell County MODs. Texas Appleseed is a non-profit public interest law center whose mission is to promote social, racial, and economic justice for all Texans by changing unjust laws and policies that prevent Texans from realizing their full potential. Appleseed has worked on disaster recovery issues in Texas since Hurricane Rita in 2005.

The CDBG-MIT program is a unique and significant opportunity for Texas to carry out strategic and high-impact activities in high-risk areas to mitigate future disasters and losses. The program defines mitigation as activities that: Increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

*The Administration cannot emphasize strongly enough the need for grantees to fully and carefully evaluate the projects that will be assisted with CDBG–MIT funds. One of the goals of CDBG–MIT is to set a nationwide standard that will help guide not just future Federal investments in mitigation and resilience activities—to include the mitigation of community lifelines, but state and local investments as well. The level of CDBG– MIT funding available to most grantees cannot address the entire spectrum of known mitigation and resilience needs. Accordingly, HUD expects that grantees will rigorously evaluate proposed projects and activities and view them through several lenses before arriving at funding decisions, including ensuring that already committed public or private resources are not supplanted by CDBG–MIT funds. (84 Fed. Reg. 45838; 45839-45840)*

The point of CDBG MIT is to fund forward-looking projects and enable the coordinated government action necessary to reduce future risk. While all Texas communities deserve protection from flooding and major storms, CDBG-MIT funding should be addressing the

greatest risks, the most vulnerable communities, and protecting as many people as possible.

## **I. Distribution Factors**

GLO’s COG Method of Distribution Guidance states that, “[t]he COG must use a direct allocation technique based on objective, replicable, and verifiable data that accounts for vulnerable populations and potential impacts from future disasters to distribute funds.”<sup>1</sup> Examples of objective, verifiable data included in the MOD Guidance include population, LMI percentage, Social Vulnerability Index (SoVI), and FEMA Individual and Public Assistance data. CTCOG has not used an allocation formula based on objective, replicable, and verifiable data, it has simply divided the available funding evenly between the two eligible counties with no explanation. This is contrary to both the MOD Guidance and the intended purpose of CDBG-MIT funds; addressing urgent mitigation needs in the most vulnerable communities. CTCOG’s division of funds does not take into account:

### **A. Population**

According to the 2020 Census, 24,754 people live in Milam County while 83,093 people live in Coryell County. Despite the considerable difference in population, population was not considered as a factor in CTCOG allocation calculation.

### **B. Previous Allocations of CDBG-MIT Funds**

During Round 1 of CDBG-MIT allocations Milam County received over \$27 million dollars while Coryell did not receive any funding.<sup>2</sup>

### **C. Social Vulnerability**

The CDC’s Social Vulnerability Index is a tool specifically designed to assess how communities will fare in times of extreme stress, including during natural disasters. Many other Texas COGs have applied the Social Vulnerability Index when allocating CDBG-MIT funds for this reason.

## **II. Prioritization of Projects and Eligible Uses**

The MOD should prioritize projects that protect the most people over the most property value.

Any methodology that uses property value will fail to prioritize LMI families and communities as required by the Notice. If an assessment of risk is based on the total cost of damages to property, assets, and public infrastructure, then damage costs would be higher in wealthier areas because of the higher value of the property and assets, and because of higher past investments in

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<sup>1</sup> GLO, Texas CDBG-MIT Regional Mitigation Program COG Method of Distribution Guidance, October 1, 2021

<sup>2</sup> Texas.Gov. \$27.3 million granted by Texas GLO for historic disaster mitigation projects in Milam County”  
<https://recovery.texas.gov/documents/mitigation/recovery-funds-awarded/1-milam-county.pdf>

infrastructure. Lower-income people and communities have lower-value properties and fewer investments in public infrastructure. As a result, mainstream approaches to calculating the “most impacted” will disproportionately privilege wealthier areas.

FEMA Hazard Mitigation Grant (HMGP) projects, for example, must meet a cost-benefit standard that counts property value over people. These grants are more available to and have historically benefited, higher-income communities. FEMA Public Assistance funds, likewise, favor communities with the capacity to apply for and manage complex federal grants, and with money to meet the federal match requirements. These disparities are increased and compounded by the history of racial segregation, which has not only depressed property values in communities of color through redlining, ongoing lending discrimination, and the location of environmental hazards, but has been marked by historical disinvestment in infrastructure and public services - including both basic drainage and other infrastructure, and protective infrastructure that would mitigate disaster damage, leaving these communities most vulnerable to disasters.

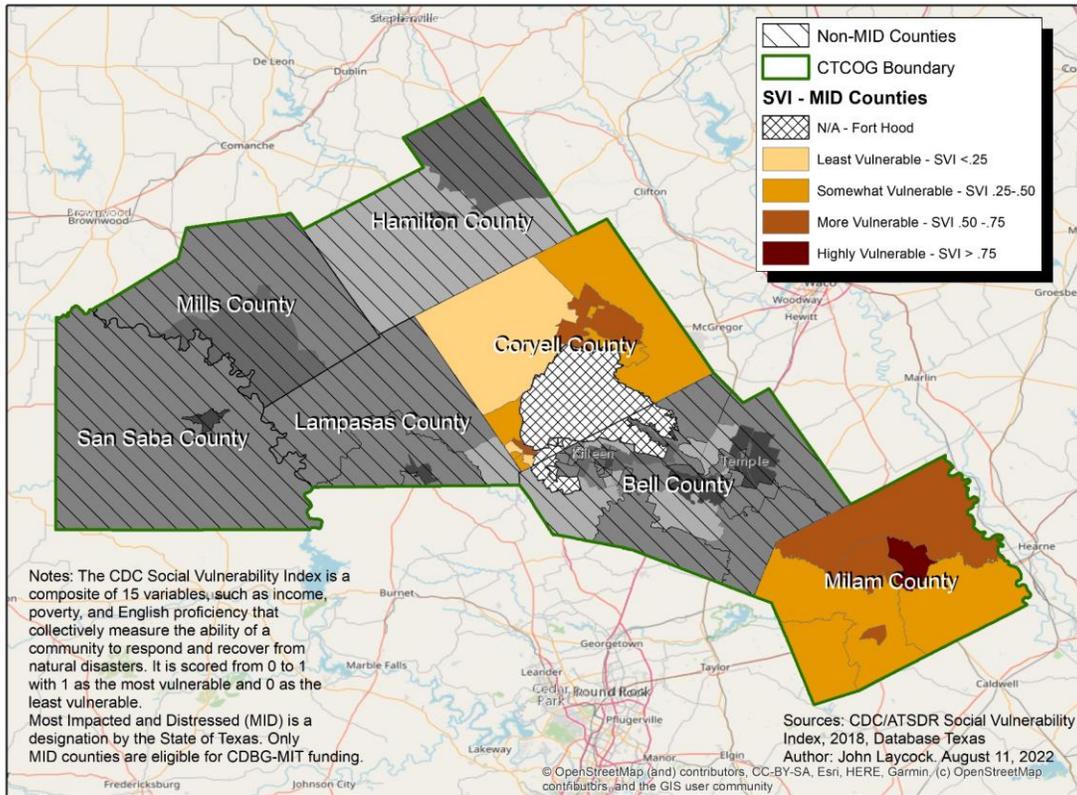
However, “[u]nlike other forms of Federal disaster recovery assistance, CDBG-DR and CDBG-MIT grants have a statutory focus on benefiting vulnerable lower-income people and communities and targeting the most impacted and distressed areas.” Not only are CDBG-DR and CDBG-MIT funds statutorily required to benefit LMI persons and communities, but they are also in many cases the only disaster recovery funds available to LMI households, and to protect the most vulnerable communities from future risks. Milam and Coryell Counties should prioritize infrastructure projects, and projects that protect the largest number of people in the most vulnerable communities. Projects that benefit LMI and historically disinvested communities should be prioritized, and regional projects must include local projects that ensure these communities can benefit from larger regional or jurisdiction-wide projects.<sup>3</sup>

The map below identifies the most socially vulnerable areas - using an objective verifiable source of data recommended by GLO - in Coryell and Milam Counties.

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<sup>3</sup> 84 Fed. Reg. 45838; Other disaster recovery programs, including both infrastructure and individual assistance programs, primarily benefit higher-income families and communities; in counties with major disasters (areas with at least \$10 billion in damages), higher-income white communities gained an average of \$126,000 in wealth following the damage and recovery efforts. Lower-income communities of color lost up to \$29,000 on average in personal wealth following events like hurricanes and wildfires. Junia Howell and James R. Elliott, “Damages Done: The Longitudinal Impact of Natural Hazards on Wealth Inequality in the United States”. *Social Problems*, Oxford University Press (August 14, 2018). Available: <https://academic.oup.com/socpro/advance-article/doi/10.1093/socpro/spy016/5074453>; see, also, Rebecca Hersher, “How Disaster Recovery Favors the Rich”, *All Things Considered*, National Public Radio (March 5, 2019). Available: <https://www.npr.org/2019/03/05/688786177/how-federal-disaster-money-favors-the-rich>

## Social Vulnerability by Census Tract in Milam and Coryell Counties



The majority of this CDBG-MIT funding should be dedicated to flood protection infrastructure, rather than other potentially allowable uses like economic development or communication infrastructure. Flood mitigation projects would actually protect residents from the impact of flooding and allow the county to get the maximum value out of these funds.

### II. Public Participation

Although CTCOG has published a citizen participation plan, the fact that no members of the public (in fact only one individual from the Rockdale Housing Authority) participated in Milam or Coryell County MOD Public Hearings indicates that the level of citizen engagement has been insufficient.

While involving the public at the earliest possible stage in planning and processes around disaster planning, response, recovery, and mitigation is crucial, the public should also be offered more opportunities to comment on Milam and Coryell proposed MOD before it is submitted to GLO. Not only will the data, objective factors, weighting, and project priorities these counties use have a substantive impact on the allocation of funds, but the public must also have an

opportunity to comment on any waivers Milam and Coryell Counties is requesting from GLO before those waivers are submitted.

Milam and Coryell Counties should also conduct the specific outreach necessary to “bring non-elected members of the community into discussions regarding the MOD.” The guidance states,

*[T]he COG must contact and work with local organizations representing protected classes of individuals, as well as organizations interested in fair housing issues, to gain additional perspective on fair housing and civil rights issues in the COG. This exercise should also help the COG understand how the people they represent are affected by natural disasters. Approaches beyond simple written notification of public hearings are encouraged. For example, the COG could host a separate meeting with housing advocacy groups active in the region or visit local offices of civil rights groups. The COG could also pursue personal outreach by calling groups individually.*

As the guidance notes, “simple written notification of public hearings” is likely to be insufficient. The low public participation in the MOD Public Hearings to date indicates that members of the public who would be affected by these funding decisions have not had a meaningful opportunity to participate.

Please don’t hesitate to contact us if you have questions or concerns about our comments. We look forward to an extension of the citizen participation process that will fully consider these and other issues and result in a more effective and equitable MOD Process.

Sincerely,

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