



## Regional Mitigation Program

Clarification of Urgent Need Mitigation (UNM) National Objective

### Urgent Need Mitigation (UNM) National Objective

This memorandum is meant to further define application reporting requirements under the Regional Mitigation Program. In establishing a benefit service area, applicants are required to determine the appropriate beneficiary identification method, either using a methodically sound survey method or use of FY 2021 LMISD with State Median Waiver Applied data. In the event a project's beneficiary outcome is below the established Low to Moderate Income (LMI) percentage, considering applicable upper quartile waivers, the project has to meet the Urgent Need Mitigation (UNM) National Objective. Per the Federal Register Notice, 84 FR 45838 (August 30, 2019):

"This notice provides a waiver and establishes an alternative requirement to include new urgent need national objective criteria that are applicable to CDBG-MIT funds only, as described in section V.A.13. of this notice. This urgent need mitigation (UNM) national objective requires activities funded with the CDBG-MIT grant to result in measurable and verifiable reductions in the risk of loss of life and property from future disasters and yield community development benefits." <sup>1</sup>

With the creation of this newly established National Objective, and if applicable, applicants are now required to further define the project's measurable and verifiable reduction in the risk of loss of life and property.

If a project qualifies under the UNM National Objective applicants are required to select UNM under the applicable project's "National Objective" tab within the QuickBase application.

The screenshot shows a navigation bar with six tabs: 'Project Info', 'National Objective', 'Environmental', 'Permits', 'Budget Activity Lines', and 'Mitigation'. The 'National Objective' tab is highlighted with a blue border. Below the tabs, a dropdown menu is open, displaying the question 'Which HUD national objective does the project meet?' and the option 'UNM' selected.

Upon indicating that a \_\_\_\_\_ project will meet the UNM National Objective, the applicant will be required to address a subsequent question in the QuickBase application to confirm the projects applicability in meeting the UNM National Objective.

<sup>1</sup> 84 FR 45838 (August 30, 2019), <https://www.govinfo.gov/content/pkg/FR-2019-08-30/pdf/2019-18607.pdf>



## Regional Mitigation Program

### Clarification of Urgent Need Mitigation (UNM) National Objective

“Does the proposed project address the current and future risks as identified in the State’s Mitigation Needs Assessment of most impacted and distressed areas; and yield a community development benefit and will it result in a measurable and verifiable reduction in the risk of loss of life and property?”

To provide an adequate response to this application question, applicants should consider the following:

- What risks are affecting the project benefit service area?
- What past events have occurred within the project benefit service area?
- What type of mitigation techniques or enhancements will take place that will result in a measurable and verifiable reduction in risk and loss of life of property for the benefit service area?
- What are the measurable and verifiable reduction(s) in risk and loss of life of property for the benefit service area?

#### **Example Scenario:**

Rango County is a fictitious County within the State of Texas and has been unfortunately hit by multiple hurricanes that have caused mass flooding throughout the County. During the creation of possible mitigation projects to address the risk of hurricanes, Rango County reviewed the entirety of the County to better understand the demographics and areas that have historically been at risk of flooding during storm events. After a meaningful analysis of protected classes and their past impacts due to this risk, the County has elected to upsize existing drainage and create a detention pond within a neighborhood (Calvin Pointe), within the City of Rango, to better protect its residents from area flooding during hurricanes or other high rain events.

- What risks are affecting the project benefit service area?
  - The individuals within Calvin Pointe reside in a low part of the City of Rango. This naturally occurring topography is further exacerbated by undersized drainage and lack of water detention. During hurricanes or high rain events this area is susceptible to area flooding.
- What past events have occurred within the project benefit service area?
  - The individuals within Calvin Pointe have been hit by two subsequent hurricanes in 2017 & 2019. During these two weather events approximately 250 households were impacted due to flooded homes, and there was an inability for emergency services to reach the individuals
- What type of mitigation techniques or enhancements will take place that will result in a measurable and verifiable reduction in risk and loss of life of property for the benefit service area?
  - During the creation of the proposed drainage project scope the local engineer analyzed the threat affecting the area and reviewed existing drainage capacity. The conclusion of this analysis was that the current drainage system is not capable of addressing proper conveyance of water during high rain events. Due to this, the engineer proposed that the current culvert system be upsized and, in conjunction to this, a detention pond should be created to assist the overall system during high rain events.



## Regional Mitigation Program

### Clarification of Urgent Need Mitigation (UNM) National Objective

- What are the measurable and verifiable reduction(s) in risk and loss of life of property for the benefit service area?
  - The engineer estimated during the creation of the project scope that these improvements will result in a fifteen percent (15%) reduction in the amount water affecting the area during high rain events. This was estimated due to the fact that the detention pond will have an acre-foot capacity and will mitigate a possible inundation within surrounding streets.

#### **Example Application Response:**

As indicated in the Mitigation section of this project application, the County of Rango has identified hurricanes as the main risk affecting its residents. More specifically, Rango County has identified Calvin Pointe within the City of Rango as being the most susceptible during such events. This is due to the neighborhood residing in a low part of the city and the naturally occurring topography is further exacerbated by undersized drainage and lack of water detention. The individuals within Calvin Pointe have been hit by two subsequent hurricanes in 2017 & 2019. During these two weather events approximately 250 households were impacted due to flooded homes, and there was an inability for emergency services to reach the individuals.

During the creation of the proposed drainage project scope the local engineer analyzed the threat affecting the area and reviewed existing drainage capacity. The conclusion of this analysis was that the current drainage system is not capable of addressing proper conveyance of water during high rain events. Due to this, the engineer proposed that the current culvert system be upsized and, in conjunction to this, a detention pond should be created to assist the overall system during high rain events. The engineer estimated during the creation of the project scope that these improvements will result in a fifteen percent (15%) reduction in the amount water affecting the area during high rain events. This was estimated due to the fact that the detention pond will have an acre-foot capacity and will mitigate a possible inundation within surrounding streets.

If you have any question related to this guidance, please email questions to [cdr.mitigation@recovery.texas.gov](mailto:cdr.mitigation@recovery.texas.gov)