



# State of Texas Plan for Disaster Recovery Amendment No. 8

The Continuing Appropriations Act, 2017 (Pub. L. 114-223, approved September 29, 2016)  
81 FR 83254 (November 21, 2016) and The Furthering Continuing Appropriations Act, 2017  
(Pub. L. 114-254, approved December 10, 2016) & (Pub. L. 115-31, approved May 5, 2017)  
82 FR 5591 (January 18, 2017) & 82 FR 36812 (August 7, 2017)

HUD Approved: December 10, 2024

Prepared by

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Flood Damage in the Houston Region on June 3, 2016 – Photo Courtesy of [Twitter.com/GregAbbott\\_TX](https://twitter.com/GregAbbott_TX)

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# I. Amendment 8: Summary of Changes

This document constitutes the eighth amendment (Substantial) to the *State of Texas Plan for Disaster Recovery (Action Plan)* dated March 10, 2017, for CDBG Disaster Recovery funds related to the 2016 flood events (DR-4266, DR-4269, and DR-4272).

The following additional changes to the Action Plan are made in this amendment:

- Disaster Recovery Reallocation Program (DRRP) created to fully utilize deobligated and unutilized funds from all other programs.
- HUD Most Impacted County Method of Distribution budget changed to \$154,867,892.08
- Remaining County Allocation budget changed to \$39,862,156.23
- MI Project Delivery budget changed to \$2,264,562.35
- State Project Delivery budget changed to \$566,139.34
- Performance and Expenditure Schedule updated

**2016 Floods CDBG-DR Allocations – Updated APA 8**

<b>Program</b>	<b>Previous Allocation</b>	<b>Change</b>	<b>Revised Allocation</b>
HUD Most Impacted County Method of Distribution	\$160,824,122	(\$5,956,229.92)	\$154,867,892.08
HUD Most Impacted County Competition	\$19,000,000	\$0	\$19,000,000
Remaining County Allocation (66 Counties)	\$40,206,023	(\$343,866.77)	\$39,862,156.23
MI Project Delivery	\$1,624,485	\$640,077.35	\$2,264,562.35
State Project Delivery	\$406,120	\$160,019.34	\$566,139.34
Disaster Recovery Reallocation Program (DRRP)	N/A	\$5,500,000	\$5,500,000
State Planning	\$4,889,500	\$0	\$4,889,500
State Administration (5%)	\$11,944,750	\$0	\$11,944,750
HUD Most Impacted (MI) Counties – Total*	\$179,824,122	\$0	\$179,824,122
<b>Total Allocation</b>	<b>\$238,895,000</b>	<b>\$0</b>	<b>\$238,895,000</b>

\*HUD Most Impacted (MI) Counties Total is not included in the Total Allocation row. HUD Most Impacted (MI) Counties Total is a total of HUD Most Impacted County Method of Distribution and HUD Most Impacted County Competition.

**MOD Distribution of HUD Most Impacted – Updated APA 8\***

<b>County</b>	<b>Previous Housing</b>	<b>Current Housing</b>	<b>Previous Infrastructure</b>	<b>Current Infrastructure</b>	<b>Total Allocation</b>
Brazoria	\$699,054.00	\$699,054.00	\$16,291,480.00	\$16,291,480.00	<b>\$16,990,534.00</b>
Fort Bend	\$10,636,203.35	\$10,636,203.35	\$7,660,204.65	\$3,636,333.64	<b>\$14,272,536.99</b>
Harris	\$36,329,837.00	\$36,329,837.00	\$29,869,895.00	\$28,738,317.74	<b>\$65,068,154.74</b>
Montgomery	\$8,919,523.20	\$8,919,523.20	\$15,047,803.80	\$14,247,022.15	<b>\$23,166,545.35</b>
Newton	\$10,447,771.22	\$10,447,771.22	\$24,922,349.78	\$24,922,349.78	<b>\$35,370,121.00</b>

\*Criteria and allocations in the Disaster Recovery Reallocation Program (DRRP) supersede any conflicting information in this table.

## II. Executive Summary

Over the past two years, Texas has experienced major disaster events — including numerous floods, tornadoes, and wildfires — that have produced six disaster declarations spread over 160 of the state’s 254 counties. The Texas counties impacted represent 76 percent of the Texas population, or 20.9 million people — a population greater than that of 48 states. In particular, the recent 2016 events were devastating, killing 29 Texans and causing significantly more public and private property damage due to the compounding effects of the 2015 floods.

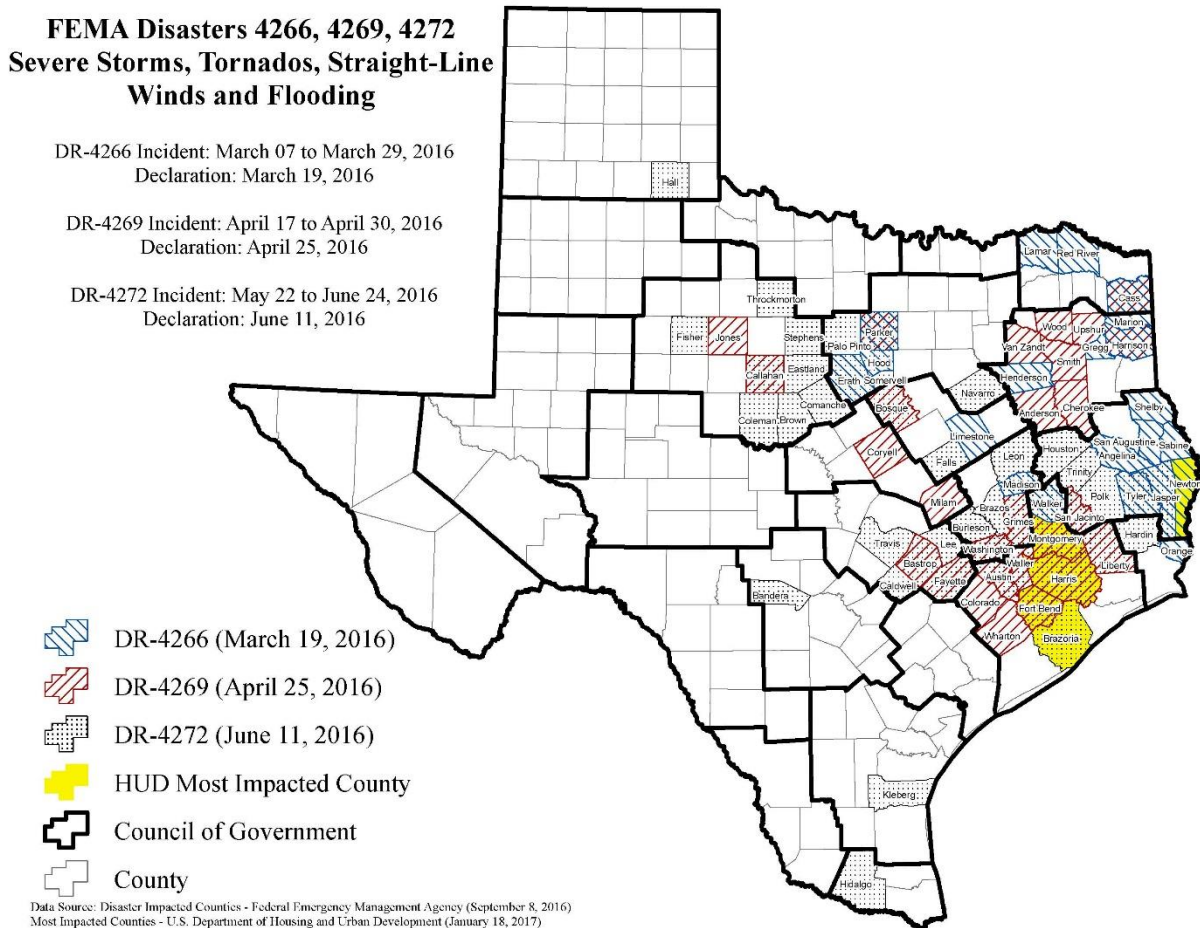


Figure 1: DR-4266, 4269 and DR-4272 Disaster Declarations

The Texas General Land Office estimates a combined loss of over \$2 billion in unmet long-term recovery need, given the impact of the multiple disasters suffered by Texas in both 2015 and 2016. Impacts tied to business interruption, economic losses, unemployment, property tax revenue decreases, agricultural losses, and other measures that are difficult to quantify, are not



considered when allocations are made. The 2016 flooding and devastation spanning from March to June resulted in three qualifying events for appropriation under Public Laws 114-223 and 114-254. These multiple events caused severe damage across almost half the State, or 134,000 square miles — almost double the size of Louisiana and West Virginia combined.



Deweyville Elementary Flooding – photo from Deweyville ISD Facebook page

The torrential rain event in March (DR-4266) was a devastating blow to many Texas communities still trying to recover from the impact of the major 2015 floods. The heavy continuous rainfall on nearly saturated ground created excessive downstream flooding and record-breaking crests for rivers. The record-setting devastation destroyed agricultural areas and homes and resulted in a major Interstate 10 closure along the Texas-Louisiana border that created lengthy delays for individuals, as well as major disruptions in the delivery of goods and services.<sup>1</sup> The extensive flooding effectively cut off access to entire communities. Thousands of Texans were forced to evacuate their homes and entire cities required mandatory evacuations. In Orange County, approximately 9,000 residents were evacuated and in Newton County,

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<sup>1</sup> Disaster Management Assessment DR-4266 Texas April 2016 FINAL. FEMA – Department of Homeland Security



approximately 3,500 residents were evacuated resulting in long-term sheltering needs for residents trying to recover and rebuild from the devastation. In Deweyville, the elementary school was flooded with over five feet of water creating an estimated \$12 million in damages. The impact to Deweyville resulted in over 600 students out of school for a month and the community without an elementary school.<sup>2</sup>

The Texas Department of Emergency Management’s Disaster Summary Outline (DSO) estimated that the state’s infrastructure was hard hit, including heavy damage to roads and multiple destroyed bridges. The swift flood waters carrying debris and devastating force left many roads impassable, forcing many closures. Due to the rain occurring upstream, river waters downstream continued to rise following the rain event — creating even more damage and impacting area residents’ ability to return or have access to their homes. The Burr’s Ferry Bridge damage alone was so severe as to require a full closure of the bridge, and subsequent extensive repairs to the bridge’s piers.



Burr’s Ferry Bridge SH 63 over Sabine River – photo by Texas Department of Transportation

On April 17, 2016 (DR-4269) Texas was hit with a sixth catastrophic rain event over a 12-month period, initiating a rare flash flood “emergency warning” by the National Weather Service’s Houston/Galveston Weather Forecast Office. The rare warning criteria was on target, given the consequences to a highly vulnerable population. The severe flooding greatly affected first responders’ abilities to assist residents and, in some instances, even

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<sup>2</sup> Disaster Management Assessment DR-4266 Texas April 2016 FINAL. FEMA – Department of Homeland Security

required the rescue of first responders themselves. Parts of Southeast Texas received 10 inches or more of rain during a 24-hour period, with the heaviest rainfall occurring north and west of Houston.<sup>3</sup> The devastating floods covered the seven counties. The president approved the governor’s Major Disaster Declaration on April 25, 2016, with Amendment 1 issued on May 2, 2016, and Amendment 2 on May 9, 2016.



Figure 2: NWS Houston/Galveston 48-hour rainfall estimates for southeast Texas April 18 and 19, 2016

Texas was hit by another intense round of devastating storms in May, a year after the historical 2015 Memorial Day flooding event. The storms occurring between May 26 and mid-June, marking the third catastrophic storm event to impact Texas in 2016; this series of storms resulted in disaster declaration DR-4272. The impact of the storms continued to create devastation as rain fell on saturated grounds in counties still recovering from previous floods. Evacuation and search data provide an insight into the sheer magnitude and regional impact of the storms. Jointly, Texas Task Force 1 and the Texas Military Department made over 1,444 evacuations, 40 rescues, 520 assists, 618 wellness checks, and many victim recoveries. Texas Parks and Wildlife Department recorded 336 evacuations and 78 rescue assists.<sup>4</sup> Mandatory evacuations were required in many counties, including Bastrop, Brazoria, Fort Bend, Hood, and Parker, along with voluntary evacuations throughout the disaster area.

<sup>3</sup> Disaster Case Management Assessment DR-4269 Texas June 2016 FINAL. FEMA – Department of Homeland Security

<sup>4</sup> Disaster Case Management Assessment Texas DR-4272 Severe Storms and Flooding August 15, 2016 FEMA – Department of Homeland Security

On May 26 and 27, the Austin area received widespread rain of 6-8 inches, and in a corridor stretching from I-35 in Austin to just east of I-45, over 12 inches of rain was recorded. The evening of May 28 provided more hardships, as the Texas Hill Country received widespread heavy rains of 6-10 inches — leading to flash flooding and critical flood stages for many rivers, including the Frio, Medina, and Guadalupe. Emergency response to the rain event included evacuations at Camp Jellystone and the Frio River.<sup>5</sup> Rescue efforts continued as a large thunderstorm moved into the Texas Hill Country the evening of May 28; subsequently, record-breaking rainfall totals were noted, as well as rare cresting above flood stage levels of rivers and creeks.

In North Texas, Memorial Day again proved to be devastating. As heavy rains fell, renewed flash flooding necessitated water rescues during overnight hours. In Hood County, 10 inches of rain flooded and shut down many county roads. This dangerous episode of flash flooding claimed the lives of 9 brave soldiers in Fort Hood, as their military vehicle was overwhelmed during a crossing and swept away into Owl Creek.<sup>6</sup>

South Texas was also severely impacted by the storms, as two confirmed EF-1 tornadoes wreaked havoc to homes and infrastructure within the communities. The Houston area alone was hit with as much as eight inches of rain in five hours.

In Fort Bend, the devastation to critical infrastructure includes damage to bridges, roads, and levees due to the continuous flooding along the Brazos River, compounding effects from the 2015 declared disasters. It is estimated that 181 homes were destroyed in the county, with an additional 600 homes experiencing major damage. Overall, the devastation of the storms led HUD to issue a “most impacted” designation for Brazoria, Fort Bend, Harris, Montgomery, and Newton Counties.

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<sup>5</sup> Disaster Case Management Assessment Texas DR-4272 Severe Storms and Flooding August 15, 2016 FEMA-Department of Homeland Security

<sup>6</sup> Disaster Case Management Assessment Texas DR-4272 Severe Storms and Flooding August 15, 2016 FEMA-Department of Homeland Security

### III. Needs Assessment

The state of Texas needs assessment for the 2016 allocation takes into account a comprehensive set of data sources that cover multiple geographies and sectors. The state will be focusing on the variety of data that help provide a comprehensive understanding of the unmet need across Texas in the housing and non-housing sectors. Given the extent of counties impacted by the disasters, a part of the unmet need calculations was determined using data provided by the Texas Division of Emergency Management (TDEM) for all applicants. These data come from the Emergency Management Mission Integrated Environment (EMMIE) database. The total projected cost for damages tied to the 2016 disasters is \$201,341,450. This results in the state’s unmet need from public assistance totaling \$57,885,667 with a resiliency multiplier of 15 percent.

**Table 1: TOTAL Unmet Need from Public Assistance (PA)**

Disaster	Projected Cost	25% Local Match (Unmet Need)	Resilience Multiplier (15%)	Total Unmet Need
DR-4266	\$29,331,951	\$7,332,988	\$1,099,948	\$8,432,936
DR-4269	\$37,806,554	\$9,451,638	\$1,417,746	\$10,869,384
DR-4272	\$134,202,945	\$33,550,736	\$5,032,610	\$38,583,347
<b>TOTAL</b>	<b>\$201,341,450</b>	<b>\$50,335,363</b>	<b>\$7,550,304</b>	<b>\$57,885,667</b>

Source: TDEM - Emergency Management Mission Integrated Environment (EMMIE) Database Report CMF Projections as of 1/9/17

The data for housing unmet needs comes from the Federal Emergency Management Agency (FEMA) and the National Emergency Management Information System (NEMIS) database. For the three disaster declarations in 2016, the total FEMA Verified Loss (FVL) is \$186,361,160. The state’s unmet need relating to FEMA Individual Assistance (IA) is \$88,131,592 with a resiliency multiplier of 15 percent. The figure for unmet need was calculated by FEMA as being FVL minus all assistance provided through the National Flood Insurance Program (NFIP), FEMA housing assistance, and Small Business Administration (SBA) assistance, as well as other assistance that could be accounted for.

**Table 2: TOTAL Unmet Need Relating to Individual Assistance (IA)**

Disaster	FEMA Verified Loss (FVL)	Unmet Need	Resilience Multiplier (15%)	Total Unmet Need
DR-4266	\$28,610,533	\$7,044,306	\$1,056,646	\$8,100,952
DR-4269	\$93,125,863	\$43,544,220	\$6,531,633	\$50,075,853
DR-4272	\$64,624,764	\$26,047,641	\$3,907,146	\$29,954,787
<b>TOTAL</b>	<b>\$186,361,160</b>	<b>\$76,636,167</b>	<b>\$11,495,425</b>	<b>\$88,131,592</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17

The unmet need, as identified by the SBA using the total verified loss of households and businesses, is \$309,254,300 for housing and \$104,720,409 for businesses. These figures also take into consideration a resilience multiplier of 15 percent totaling \$40,337,517 for housing data and \$13,659,184 for business data.

**Table 3: TOTAL Unmet Need Relating to SBA Home Data**

Disaster	SBA Total Verified Loss (Home Data)	Resilience Multiplier (15%)	Total Unmet Need (Home Data)
DR-4266	\$41,999,811	\$6,299,972	\$48,299,783
DR-4269	\$129,504,744	\$19,425,712	\$148,930,456
DR-4272	\$97,412,228	\$14,611,834	\$112,024,062
<b>TOTAL</b>	<b>\$268,916,783</b>	<b>\$40,337,517</b>	<b>\$309,254,300</b>

Source: SBA Home Data as of 10/27/16

**Table 4: TOTAL Unmet Need Relating to SBA Business Data**

Disaster	SBA Total Verified Loss (Business Data)	Resilience Multiplier (15%)	Total Unmet Need (Business Data)
DR-4266	\$16,314,312	\$2,447,147	\$18,761,459
DR-4269	\$55,241,648	\$8,286,247	\$63,527,895
DR-4272	\$19,505,265	\$2,925,790	\$22,431,055
<b>TOTAL</b>	<b>\$91,061,225</b>	<b>\$13,659,184</b>	<b>\$104,720,409</b>

Source: SBA Business Data as of 10/27/16

FEMA and SBA data alone yield an unmet need for the state of Texas totaling \$559,991,968. This estimate only considers FEMA IA and PA estimates, and SBA estimates, and does not take into consideration lost property valuation, sales tax revenue, business interruption costs, unemployment, agricultural losses, and loss of tourism revenue. When considering the impacts of the early 2016 disaster, DR-4255, and the additional unmet need tied to the 2015 disasters, Texas has a quantifiable unmet need of approximately \$1 billion. This figure increases to



approximately \$2 billion when factoring in the above-mentioned components of disaster loss and recovery needs for both 2015 and 2016.

**Table 5: State's Total Unmet Need (2016)**

<b>Sector</b>	<b>Unmet Need Amount</b>
FEMA IA Unmet Need	\$88,131,592
FEMA PA Unmet Need	\$57,885,667
SBA Home Unmet Need	\$309,254,300
SBA Business Unmet Need	\$104,720,409
<b>TOTAL Unmet Need</b>	<b>\$559,991,968</b>

The below information provides an unmet needs foundation and basis, as well as a concise breakdown of how funds should be allocated to the five most impacted counties and the additional 66 counties impacted by these disasters.

The state of Texas has been allocated a total of \$238,895,000 for the 2016 flooding disasters. A total of five percent (\$11,944,750) of these funds will be used for the state’s administration of these funds. Initially, 10 percent (\$23,889,500) of the total allocation was budgeted for planning activities; however, Amendment 4 to this Action Plan reduced that amount by \$19,000,000 to \$4,889,500 after which planning activities account for roughly 2 percent of the total budget. After subtracting 7 percent for state administration and planning costs, the remaining funds are to be split between HUD’s most impacted counties of Brazoria, Fort Bend, Harris, Montgomery, and Newton. After the 7 percent deduction, and the one percent deduction for project delivery, these most impacted counties will receive a total of \$179,824,122. This leaves the remaining 66 county allocation at \$40,206,023, after the reduction of one percent for project delivery, which is explained below.

A one percent project delivery amount is taken from the total allocation for the most impacted counties; this amount is a total of \$1,624,485 for most impacted project delivery. There is also a one percent amount taken from the remaining 66 county allocation; this amount is \$406,120 for the state project delivery. The below table provides a breakdown of these funds.<sup>7</sup>

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<sup>7</sup> \$8.00 has been removed from the state allocation for the 66 counties so that funds could be distributed amongst the five most impacted counties in order to make the dollar figures whole numbers. Two dollars and fifty cents were also transferred from project delivery to the rest of county allocation to make the project delivery funds whole numbers as well.



**Table 6: Allocation Breakdown**

<b>5 HUD Most Impacted (MI) Counties</b>	
HUD Most Impacted County Method of Distribution	\$154,867,892.08
HUD Most Impacted County Competition	\$19,000,000
<b>State Allocation</b>	
Remaining County Allocation (66 Counties)	\$39,862,156.23
MI Project Delivery	\$2,264,562.35
State Project Delivery	\$566,139.34
<b>Disaster Recovery Reallocation Program (DRRP)</b>	
Disaster Recovery Reallocation Program (DRRP)	\$5,500,000.00
<b>Planning and Administration</b>	
State Planning	\$4,889,500
State Administration (5%)	\$11,944,750
<b>Total Allocation</b>	<b>\$238,895,000</b>

The CDBG-DR allocations for the 2016 Floods came in three separate allocations from Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, Vol. 82, No.11, Wednesday, January 18, 2017, and Vol. 82, No. 150, Monday, August 7, 2017.

**Table 6a: Allocation by Appropriation\***

<b>2016 Floods Breakdown</b>	<b>1<sup>st</sup> and 2<sup>nd</sup> Allocation</b>	<b>3<sup>rd</sup> Allocation</b>	<b>TOTAL Allocation</b>	<b>Amendment 4</b>
Most Impacted Co Allocation	\$ 149,628,127	\$ 11,195,995	\$ 160,824,122	\$ 179,824,122
Rest of State Allocation	\$ 37,407,030	\$ 2,798,993	\$ 40,206,023	\$ 40,206,023
MI Project Delivery (1% of MI Allocation)	\$ 1,511,395	\$ 113,090	\$ 1,624,485	\$ 1,624,485
State Project Delivery (1% of State Allocation)	\$ 377,848	\$ 28,272	\$ 406,120	\$ 406,120
State Planning (10%)	\$ 22,226,400	\$ 1,663,100	\$ 23,889,500	\$ 4,889,500
State Administration (5%)	\$ 11,113,200	\$ 831,550	\$ 11,944,750	\$ 11,944,750
<b>TOTAL</b>	\$ 222,264,000	\$ 16,631,000	\$ 238,895,000	\$ 238,895,000

*\*Criteria and allocations in the Disaster Recovery Reallocation Program (DRRP) supersede any conflicting information in this table.*

## A. Pre-Disaster Baseline Data

### Conditions Before the Disaster

**Economy:** One of the important components of Texas is the way in which its economy functions. Historically, the state has fared rather well in multiple sectors. According to Texas A&M Real Estate Center's Monthly Review of the Texas Economy for December 2016, "The Texas economy advanced from November as the number of jobs increased by over 6,100 (seasonally adjusted). The service-providing sector carried December's employment growth, mainly in the health, education, and leisure industries, as well as the government sector. The energy sector continued to improve as crude oil and natural gas prices reached their highest levels since 2014. A recovering energy industry may result in more goods-producing jobs in early 2017. The manufacturing industry in Texas performed well for the month; manufacturers reported increased factory activity and employment demands despite a strong U.S. dollar. Additionally, the strong dollar held inflation to a monthly increase of about 2 percent. Housing sales in Texas and its major metros were modest. Housing supply remained constricted, but an increase in statewide building permits hints at supply increases. Overall, the economy appears solid, and expectations are optimistic for 2017." It is also noted that "Texas' pace of job creation exceeded the nation's in December 2016. Texas gained 213,500 nonagricultural jobs from December 2015 to December 2016, an annual growth rate of 1.8 percent, higher than the nation's employment growth rate of 1.4 percent. The nongovernment sector added 173,400 jobs, an annual growth rate of 1.7 percent, higher the nation's employment growth rate of 1.5 percent in the private sector."<sup>8</sup>

**Environment:** While the economic sector is demonstrating strong metrics for the year, the environmental components of the state have still been volatile. Prior to May 2015, Texas experienced a historic drought that began in October 2010 (U.S. Drought Monitor). According to the Office of the State Climatologist, the driest 12-month period on record for Texas was October 2010 to September 2011, with a statewide average of only 11.18 inches of rain.<sup>9</sup> From November 15, 2010 through October 31, 2011, a total of 3.9 million acres and approximately 5,900 structures were damaged and/or destroyed during the 2011 wildfire season. Many factors contributed to the record-breaking season, including the La Niña weather pattern that caused extreme drought conditions, high winds from Tropical Storm Lee, and unprecedented

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<sup>8</sup> Texas A&M Real Estate Center - <https://www.recenter.tamu.edu/articles/technical-report/outlook-for-the-texas-economy>

<sup>9</sup> The Office of the State Climatologist, Texas A&M University - [http://climatexas.tamu.edu/files/osc\\_pubs/2011\\_drought.pdf](http://climatexas.tamu.edu/files/osc_pubs/2011_drought.pdf)

high temperatures. These weather conditions, combined with the availability of large amounts of dry fuels, led to the intensity of these wildfires. Bastrop County specifically experienced the most destructive fire, with a final count of 34,457 acres burned and 3,017 homes destroyed and/or severely damaged.

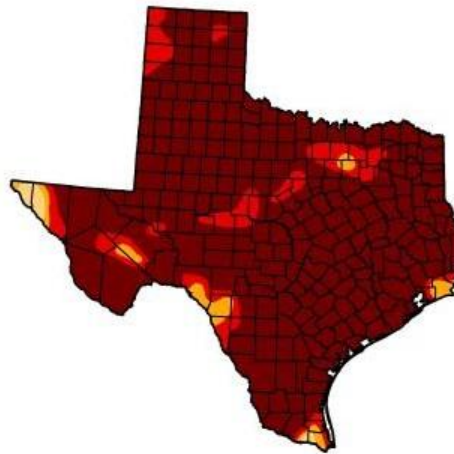
Figure 3: Texas Drought Monitor

# U.S. Drought Monitor

September 13, 2011  
Valid 7 a.m. EST

## Texas

	Drought Conditions (Percent Area)					
	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	100.00	99.17	96.75	87.83
Last Week (09/06/2011 map)	0.00	100.00	99.93	99.01	85.68	81.06
3 Months Ago (06/14/2011 map)	1.97	98.03	96.53	94.77	88.57	64.78
Start of Calendar Year (12/28/2010 map)	7.89	92.11	69.43	37.46	9.59	0.00
Start of Water Year (09/28/2010 map)	75.57	24.43	2.43	0.99	0.00	0.00
One Year Ago (09/07/2010 map)	69.60	30.40	5.25	1.51	0.00	0.00



**Intensity:**

- D0 Abnormally Dry
- D1 Drought - Moderate
- D2 Drought - Severe
- D3 Drought - Extreme
- D4 Drought - Exceptional

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

<http://drought.unl.edu/dm>



Released Thursday, September 15, 2011  
Mark Svoboda, NDMC

The extended drought that Texas experienced made the state susceptible to wildfires and flash flooding. These drought factors contributed to the inability of soils to effectively absorb water runoff. The wildfires also engendered severe flooding by removing vegetation that usually works to slow down and trap rainfall. When the state received record amounts of rain not once but twice in 2016, it created the perfect environment for widespread and severe flooding.

As stated previously, over the past two years Texas has experienced major disaster events including numerous flooding, tornado, and wildfire events; this resulted in six disaster declarations spread over 160 of the state's 254 counties. The compounding effects seen from the 2015 floods greatly enhanced the damages experienced by counties during the 2016 floods. Following a historic drought across the state, these multiple events in 2015 and 2016 killed multiple people and caused severe damage across nearly half the state, or 134,000 square miles.

**Housing:** When looking at the housing market in Texas, there remains strong housing demand and a tight supply. As stated by Texas A&M's Real Estate Center "Months of Inventory of Texas houses settled at 3.6 months (seasonally adjusted); further indicating strong housing demand and tight supply. The nation rested at 4.3 months (around 6.5 months of inventory is considered a balanced housing market). Seasonally adjusted months of inventory in San Antonio (3.4) and Houston (3.6) remained near the state level; but Austin (2.5), Dallas (2.1), and Fort Worth (2.1) exhibited even tighter supply."<sup>10</sup> In an already tight market, the loss of housing associated with the 2016 events only compounded affordability issues in the state.

## **B. Pre-Disaster Baseline in Common Planning Tools**

The State of Texas Consolidated Plan 2015-2019, prepared by the Texas Department of Housing and Community Affairs (TDHCA), contains the housing needs assessment for the state (<http://www.tdhca.state.tx.us/board/docs/books/141218-Item1h-2015-2019-StateofTexasConsolidatedPlan.pdf>). Between 2000 to 2010, Texas' population grew 17 percent, and the number of households increased 15 percent.

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<sup>10</sup> Texas A&M Real Estate Center - <https://www.recenter.tamu.edu/articles/technical-report/outlook-for-the-texas-economy>

Table 7: State of Texas Population and Median Income

Demographics	Base Year: 2000	Most Recent Year: 2010	% Change
Population	20,851,820	24,311,891	17%
Households	7,393,354	8,539,206	15%
Median Income	\$39,927	\$49,646	24%

Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

“Texas is the second largest state in the nation, the second most populous state, and is growing at a much faster rate than the nation as a whole. The American Community Survey 2008 and 2012 1-year estimates found that the United States population was growing at 3 percent while Texas was growing at 7 percent during that five-year period. With this kind of growth, both new development and redevelopment are occurring in the diverse landscape of Texas.”<sup>11</sup>

Between 2006 and 2010, almost 3.5 million households, or over one-third of total Texas households, made only 80 percent or less of area median family income (AMFI). From 2000 to 2010, the median home value increased 59 percent, and the median contract rent increased 28 percent. The 2016 flood’s impact on housing stock compounds the lack of affordable housing, and potentially places families at higher risk of becoming homeless.

### C. Elderly Populations

As defined by the Department of Housing and Urban Development, an “Elderly Person Household” is a household composed of one or more persons at least one of whom is 62 years of age or more at the time of initial occupancy. This definition is expanded upon with the term “frail elderly,” which HUD labels as an elderly person who is unable to perform at least three activities of daily living (eating, bathing, grooming, dressing, or home management activities) on their own.<sup>12</sup>

A study conducted by the American Community Survey from 2009-2013 revealed that 2,736,346 Texans are classified as elderly (age 65 years and older). In total, the elderly population of the state accounts for 10.7 percent of the entire population, with the large majority residing in urban areas. Despite the majority, the rural elderly face unique challenges,

<sup>11</sup> Texas Department of Housing and Community Affairs (TDHCA), State of Texas Consolidated Plan, Page 123 - <http://www.tdhca.state.tx.us/board/docs/books/141218-Item1h-2015-2019-StateofTexasConsolidatedPlan.pdf>

<sup>12</sup> TDHCA, State Low Income Housing Plan - <http://www.tdhca.state.tx.us/pdf/16-Draft-SLIHP.pdf>

as their physical proximity to urban areas makes access to health facilities, community centers, and other amenities more difficult.<sup>13</sup>

#### D. Pre-Disaster Homelessness

In 2014, Texas accounted for six percent of the nation’s total chronically homeless population. Although Texas has seen one of the largest decreases (38 percent decline) in homelessness from 2007 to 2014, a study conducted by the Texas Homeless Network revealed that 23,678 persons in the state were physically counted as homeless in 2015.<sup>14</sup>

While overall homelessness, chronic homelessness, and homelessness among veterans has been on the decline, the number of homeless children has increased. According to the National Center on Family and Homelessness, 190,018 Texas children experienced homelessness in 2013. Continuum of Care data, as published by HUD, further bolsters this statistic in revealing that 30.97 percent of the total homeless population in the State is comprised of households with one adult and at least one child under the age of eighteen years.

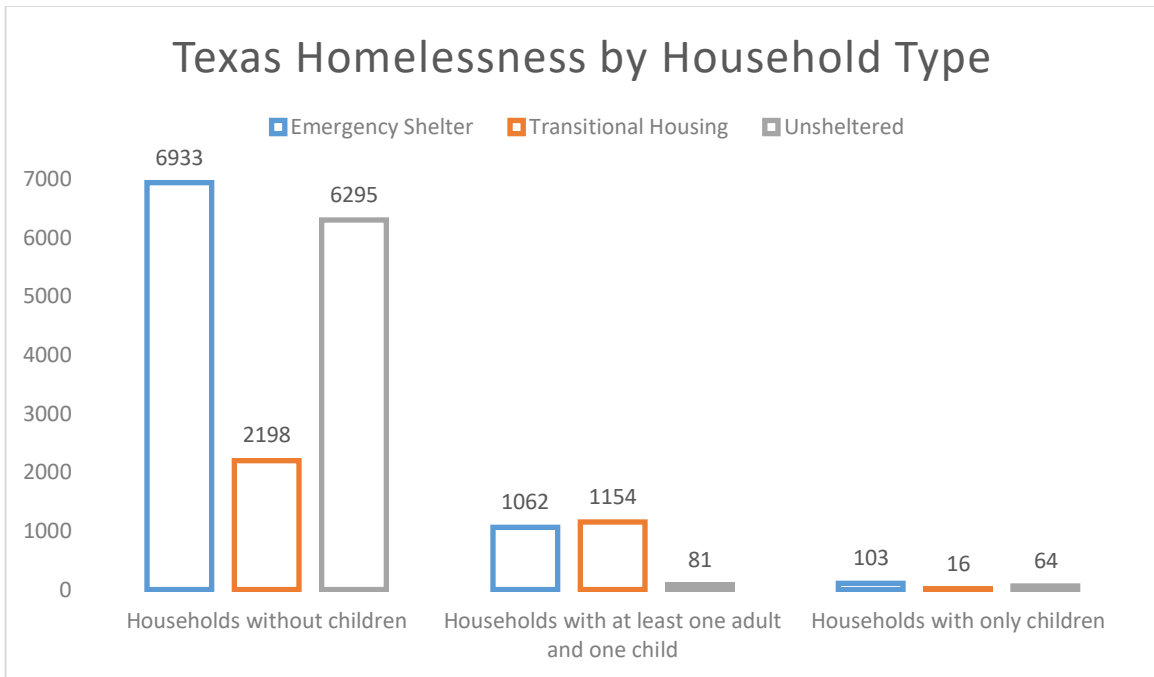


Figure 4: Texas Homelessness by Household Type

<sup>13</sup> TDHCA, State Low Income Housing Plan - <http://www.tdhca.state.tx.us/pdf/16-Draft-SLIHP.pdf>

<sup>14</sup> TDHCA, State Low Income Housing Plan - <http://www.tdhca.state.tx.us/pdf/16-Draft-SLIHP.pdf>



**State Homeless Support Services:** Texas has a widespread and robust homeless support services program (without the limitation in the service area of the CDBG-DR program). The state is actively coordinating and collaborating with localities and non-profits to comprehensively address pre-disaster homelessness separately from CDBG-DR funding. Therefore, funds will not be set aside to specifically address disaster homelessness. Our competitive application process will focus on CDBG-DR eligible projects so that communities have as much local control as possible to most effectively and efficiently meet their recovery and resiliency needs. Each applicant will detail any homeless issues suffered, and local solutions being undertaken to address those issues.

The Texas Homeless Network is a statewide non-profit organization, partly funded by the Texas Department of Housing and Community Affairs (TDHCA) and the Texas Department of State Health Service (DSHS), that provides training and technical assistance around the state to help service providers and communities better serve the homeless population with the end goal of preventing and ending homelessness.<sup>15</sup>

TDHCA's Homeless Housing and Services Program (HHSP) provides funding to the eight largest cities in support of services to homeless individuals and families. The cities currently served through HHSP are Arlington, Austin, Corpus Christi, Dallas, El Paso, Fort Worth, Houston, and San Antonio. The Texas Legislature has, through the enactment of Senate Bill 1 and Senate Bill 2 (83rd Legislature, 1st called session), provided General Revenue funds of \$10 million over the biennium. Allowable activities include construction, development, or procurement of housing for homeless persons; rehabilitation of structures targeted to serving homeless persons or persons at-risk of homelessness; provision of direct services and case management to homeless persons or persons at-risk of homelessness; or other homelessness-related activity as approved by TDHCA.

#### Program Highlights:

- Homeless population in the eight cities in 2014: 18,291 (down from 22,603 in 2012).
- Unduplicated numbers served from 2009–2014: 33,080 people, 26,734 households.
- Targets for 2015 (unduplicated): 5,846 persons, 4,062 households.
- Number of people that transitioned to permanent housing in the 2013–2014 program years: 3,052.
- Number of people that achieved specific quality of life outcomes due to construction and rehabilitation projects in 2013–2014: 2,376.
- Duplicated numbers served from 2009–2014: 68,827 people; 49,854 households.

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<sup>15</sup> Texas Homeless Network - <http://www.thn.org/>

Additionally, The Texas Interagency Council for the Homeless (TICH) was established in 1995 and coordinates the state's resources and services to address homelessness. TICH serves as an advisory committee to TDHCA. Representatives from 11 state agencies sit on the council, along with members appointed by the governor, lieutenant governor, and speaker of the house of representatives.<sup>16</sup> The council's duties include:

- Survey current resources for services for the homeless in the state;
- Assist in coordinating and providing statewide services for all homeless individuals;
- Increase the flow of information among separate providers and appropriate authorities;
- Provide technical assistance to TDHCA in assessing the need for housing for individuals with special needs in different localities; and
- Maintain a centralized resource and information center for homeless services.

To better understand how the state's infrastructure is positioned to address the complexities of housing instability, TICH initiated a study in January 2011. The council convened work groups composed of representatives from nonprofit organizations and 11 state agencies, analyzed state data, reviewed national research, and gathered public input through 10 hearings. *Pathways Home* presents findings from this study, which indicates that greater coordination of employment and health service resources with local housing programs would expand the state's capacity to prevent and end episodes of homelessness. In response to the study's findings, *Pathways Home* proposes a framework to help more of Texas' most vulnerable citizens enter and remain in safe housing.<sup>17</sup>

The Department of State Health Services' (DSHS's) Projects for Assistance in Transition from Homelessness (PATH) program provides outreach in the form of (1) screening, diagnostic assessment, and treatment; (2) habitation and rehabilitation; (3) community mental health services; (4) outpatient alcohol or drug treatment (for clients with serious mental illness); (5) staff training and case management; (6) referrals for primary health services, job training, educational services (including HIV prevention activities), and relevant housing services; (7) assistance in obtaining income support services including Social Security Income and representative payee per appropriate regulations; (8) housing services including planning for housing; (9) technical assistance in applying for housing assistance; and (10) improving coordination of housing and services and the costs of matching individuals with appropriate housing and services. The service areas are Amarillo, Austin, Beaumont, Conroe, Corpus Christi, Dallas, El Paso, Fort Worth, Galveston, Harlingen, Houston, Laredo, Lubbock, San Antonio, and

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<sup>16</sup> Texas Interagency Council for the Homeless (TICH) - <http://www.tdhca.state.tx.us/tich/>

<sup>17</sup> TICH, Pathways Home - <http://www.tdhca.state.tx.us/tich/pathways-home.htm>

Waco. The state will also share HUD’s homeless information web page with all eligible communities in order to substantiate their homeless prevention efforts.<sup>18</sup>

### E. Housing Disaster Impacts

In reviewing the FEMA Information and Data Analysis (FIDA) database provided by FEMA, there were 43,761 applicants for housing assistance through the Individual Assistance (IA) program tied to disasters DR-4266, DR-4269, and DR-4272. The April 2016 event (DR-4269) had the highest number of applicants with 26,428. Furthermore, the period of the three disasters is reflected in the total claims made in the National Flood Insurance Program (NFIP) for Texas, where a total of 13,282 claims were made over the period of the 2016 disasters.

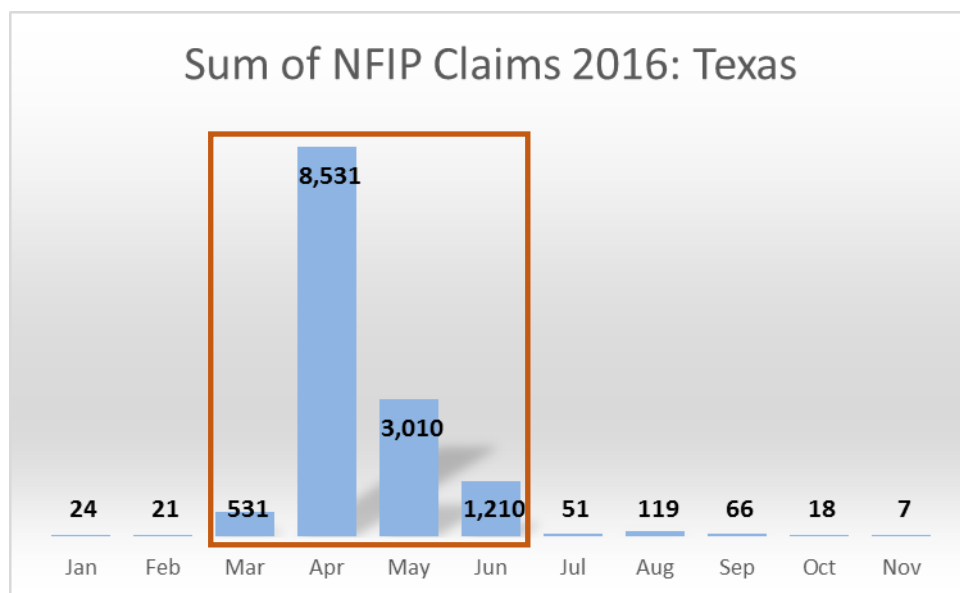


Figure 5: FEMA NFIP Data as of 11/30/16

In total, 71 counties were impacted by these three disasters. The FIDA dataset signifies the number of applicants (individuals and households) for IA from FEMA. This dataset tracks the sequence of delivery for these applications, with FEMA Housing Assistance as the first source of funds, then the Small Business Administration (SBA), and then FEMA-State Other Needs Assistance (ONA).

<sup>18</sup> HUD Homeless Information - <http://portal.hud.gov/hudportal/HUD?src=/states/texas/homeless>

**Table 8: Total FEMA IA Applicants and Counties**

<b>Disaster</b>	<b>Total Applicants</b>	<b>Applicants w/ Unmet Need</b>	<b>Number of Counties</b>
DR-4266	4,311	1,018	21
DR-4269	26,428	7,344	27
DR-4272	13,022	4,719	46
<b>TOTAL</b>	<b>43,761</b>	<b>13,081</b>	<b>71</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17. Counties from FEMA Declaration Maps

Data tied to unmet housing needs comes from the IA program and the FEMA NEMIS database. In the FEMA IA program administered by the Texas Division of Emergency Management (TDEM), there is a total of 13,081 households that are demonstrating unmet needs for all 71 counties. Unmet needs are defined as FEMA Verified Loss Amounts less the total amount of assistance being provided to households. This assistance consists of IA, SBA, homeowner’s insurance, and other potential assistance provided to households. The average unmet need per household for all three disasters is \$5,859. The NEMIS database identifies a total unmet housing need of \$88,131,592, with a 15 percent resilience multiplier.

When looking at additional funding sources, it was found that 1,586 applicants out of the total 43,761 were recipients of SBA funding. The total SBA funding identified in the IA program was \$32,675,840. Recipients of funds under the National Flood Insurance Program (NFIP) was much lower at 545, with a total NFIP amount at \$327,000.

Of the total 43,761 applicants for IA, 64 percent (27,877) were from owner-occupied units; 36 percent (15,550) were from renter-occupied units. The remaining one percent (334) were not designated as either owner or renter. However, when looking at the 13,081 households that had remaining unmet need, only 0.2 percent (21) were from renter-occupied units; 99.8 percent (13,060) were from owner-occupied units.

Recipients of CDBG- DR housing funds will be required to execute subrogation agreements in the event that future insurance or other funding is made available to recipients; infrastructure agreements will carry similar language. Due to the limitations of data sets on a statewide basis, the housing needs of single-family housing vs. multifamily housing was not determined in this plan. Subrecipients will determine their local housing needs, which will be conveyed through their housing applications to the GLO.

## F. Most Impacted Counties – Individual Assistance (Housing)

The total FEMA Verified Loss (FVL) for the five most impacted counties totaled more than \$148.8 million, with Harris County demonstrating the most FVL at just under \$75 million. Total unmet need for all five of these counties totals \$64.2 million, with Harris County having a total of \$37.7 million. Brazoria County had the lowest level of FVL with \$11.4 million, and a total unmet need of \$3.8 million.

**Table 9: FVL and Unmet Need by MI County**

County	Total FEMA Verified Loss (FVL)	Total Unmet Need
Brazoria	\$11,448,734	\$3,848,839
Fort Bend	\$15,866,703	\$6,581,746
Harris	\$74,999,440	\$37,700,367
Montgomery	\$26,934,416	\$11,785,774
Newton	\$19,577,056	\$4,275,505
<b>TOTAL</b>	<b>\$148,826,348</b>	<b>\$64,192,230</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17.

When comparing the IA unmet need per capita for the five counties, we find that there is a stark contrast between Newton and the other four counties — this is due to the disparate populations between Newton and the other counties. Given Newton County’s low population of 13,986, the unmet need per capita is \$305.70, as compared to Harris County’s unmet need of \$8.31 per capita. In other words, Newton County’s unmet need is 36 times greater than the next highest tabulation of an affected county’s need.

**Table 10: Unmet Need Per Capita**

County	Unmet Need	Population (2015)	Unmet Need Per Capita
Brazoria	\$3,848,839	346,312	<b>\$11.11</b>
Fort Bend	\$6,581,746	716,087	<b>\$9.19</b>
Harris	\$37,700,367	4,538,028	<b>\$8.31</b>
Montgomery	\$11,785,774	537,559	<b>\$21.92</b>
Newton	\$4,275,505	13,986	<b>\$305.70</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17. Census Bureau: American Community Survey Quick Facts

This same scenario is conveyed for the FVL per capita, with Newton showing FVL of \$1,399.76, and Montgomery and Harris Counties showing \$50.11 and \$16.53, respectively. This fact shows that Newton would need to spend \$1,399.76 per person to alleviate the disaster impacts to households.

**Table 11: FEMA Verified Loss Per Capita**

County	FEMA Verified Loss	Population (2015)	FVL Per Capita
Brazoria	\$11,448,734	346,312	<b>\$33.06</b>
Fort Bend	\$15,866,703	716,087	<b>\$22.16</b>
Harris	\$74,999,440	4,538,028	<b>\$16.53</b>
Montgomery	\$26,934,416	537,559	<b>\$50.11</b>
Newton	\$19,577,056	13,986	<b>\$1,399.76</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17.Census Bureau: American Community Survey Quick Facts

The table below shows that Harris County had 21,781 applicants — the most of any county. Newton had the least number of applicants, with a total of 1,463. However, when compared to population size (Table 12), this means that 0.5 percent of Harris County’s population applied for assistance, whereas in Newton County, over 10 percent of the population applied.

**Table 12: FEMA IA Applicant Percent of County Population**

County	Applicants	Population (2015)	App % of Co Population
Brazoria	1,589	346,312	<b>0.5%</b>
Fort Bend	1,979	716,087	<b>0.3%</b>
Harris	21,781	4,538,028	<b>0.5%</b>
Montgomery	4,622	537,559	<b>0.9%</b>
Newton	1,463	13,986	<b>10.5%</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17.Census Bureau: American Community Survey Quick Facts

Additionally, because households apply for assistance (rather than individuals), it is important to identify how many applicants per household there are for each individual county. The contrast between Newton and the other counties is seen even more starkly here when the figures show that more than 30 percent of Newton County’s households applied for assistance. The next closest county is Montgomery, showing 2.67 percent of households applying (Table 13).



**Table 13: FEMA IA Applicant Percent of County Households**

<b>County</b>	<b>Applicants</b>	<b>Households (2015)</b>	<b>App % of Co Population</b>
Brazoria	1,589	112,510	<b>1.41%</b>
Fort Bend	1,979	206,188	<b>0.96%</b>
Harris	21,781	1,499,528	<b>1.45%</b>
Montgomery	4,622	173,238	<b>2.67%</b>
Newton	1,463	4,825	<b>30.32%</b>

Source: FEMA Report - FIDA\_27843\_FSA\_TX\_GLO as of 1/11/17. Census Bureau: American Community Survey Quick Facts

For the most impacted counties identified by HUD, there is a wide variance in the above numbers. The figures show that total unmet need in dollars does not tell the whole story of what these counties face when it comes to recovery; this will be discussed in the below section that scrutinizes both the total unmet need for the state and the methodology for breaking out funds per most impacted county.

### **G. Non-Housing Disaster Unmet Needs**

As stated in the introduction to the Needs Assessment, the state of Texas, through coordination with TDEM, compiled a list of Public Assistance (PA) applicants for all three disasters in 2016. These figures come from the FEMA EMMIE database (as of January 9, 2017). The projected cost amount is what FEMA and localities determine to be the total of what will eventually be written for total project costs. The total eligible amount is what has been written to date, and the federal share eligible is the 75 percent of federal matching funds correlated to the total eligible amount. For disaster-related projects, it is reasonable to expect that the total eligible amount will reach the projected cost amount; however, the two will not balance until the application is closed. It is the projected cost amount that provides the total amount of damages for each locality and county. Due to there being a 75 percent federal share tied to the projected cost amount, it is the remaining 25 percent of the projected cost amount, plus 15 percent as a resiliency multiplier, that signifies the total non-housing unmet need for these localities.

For all impacted counties in Texas, there is a projected cost amount of \$201,341,450. The 25 percent local match total is \$50,335,363 for the state. When accounting for a resilience multiplier of 15 percent (\$7,550,304), the total unmet need for the state (tied to Public Assistance) is \$57,885,667.

**Table 14: TDEM/FEMA Non-Housing Unmet Need by Disaster**

<b>Disaster</b>	<b>Projected Cost</b>	<b>25% Local Match (Unmet Need)</b>	<b>Resilience Multiplier (15%)</b>	<b>Total Unmet Need</b>
DR-4266	\$29,331,951	\$7,332,988	\$1,099,948	\$8,432,936
DR-4269	\$37,806,554	\$9,451,638	\$1,417,746	\$10,869,384
DR-4272	\$134,202,945	\$33,550,736	\$5,032,610	\$38,583,347
<b>TOTAL</b>	<b>\$201,341,450</b>	<b>\$50,335,363</b>	<b>\$7,550,304</b>	<b>\$57,885,667</b>

Source: TDEM - Emergency Management Mission Integrated Environment (EMMIE) Database Report as of 1/9/2017

Because so much of the state was impacted by these 2016 events, and property valuations occur locally by county on differing schedules, the impact on property values, though impossible to determine, should be regarded as a factor of the long-term impact that communities will face as they struggle to recover using their own resources. Additionally, it must be noted here that while unmet housing need will be addressed, there remains significant unmet need in the non-housing sector. When combining the need from Public Assistance (\$57,885,667) and SBA Business Unmet Need (\$104,720,409), there yields a grand total of non-housing disaster unmet needs of \$162,606,076. Projects affiliated with economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.

#### **H. Resiliency Solutions and Unmet Need for the State**

Recognizing the state’s long and well-documented history of flooding, as well as its ongoing efforts to mitigate future flooding in our most vulnerable areas, the state is committed to rebuilding resiliently. In assessing unmet needs, it is important to consider the additional costs of safeguarding housing and community investments from future disasters. As such, Texas will not only be assessing applications and considering state-run programs that replace or repair lost property, but will also be seeking to invest resources in efforts that promise to mitigate damage from future disasters. Although initially more costly, these mitigating efforts greatly reduce the cost of future damages.

Single family home resiliency solutions are expected to add 10 percent to 15 percent to the total cost per home; multifamily resiliency solutions add 15 percent to 20 percent to the total cost per project; and infrastructure solutions add 15 percent to 20 percent to the total cost per project. Resiliency solutions are varied and dependent on the respective area’s Threat and

Hazard Identification and Risk Assessment (THIRA). The THIRA utilizes an all-hazards approach; however, for this grant funding, the focus will be on flood resiliency solutions.

Home resiliency solutions include elevating the first floor of habitable area; breakaway ground floor walls; reinforced roofs; storm shutters; and mold and mildew resistant products. Multifamily resiliency solutions include elevation; retention basins; fire-safe landscaping; firewalls; landscaped floodwalls; and a combination of both single family and infrastructure solutions.

In the case of infrastructure resiliency solutions, improvements will include:

- Raising facilities above base flood elevation;
- Having backup power generators for critical systems (water, sewer, etc.);
- Elevating critical systems, retention basins, larger culverts, culvert debris guards, erosion control solutions, raising roadways, and redundant communication systems.

Once the state considers the amount of resiliency solutions that will be tied to housing and infrastructure projects, the amount of unmet need increases significantly. The resiliency multiplier used here will be a standard 15 percent for both housing and non-housing activities.

**I. Total Unmet Need for the State of Texas**

**Total Unmet Need:** It is important to determine how to best allocate the CDBG-DR funds effectively across the state to counties that demonstrate the most need. The counties that are deemed most impacted by HUD are Brazoria, Fort Bend, Harris, Montgomery, and Newton. Total unmet need for these five counties is seen in Table 15.

**Table 15: Total Unmet Need for Most Impacted Counties**

County	Unmet Need
Brazoria	\$31,991,709
Fort Bend	\$51,685,074
Harris	\$222,284,271
Montgomery	\$65,203,818
Newton	\$47,757,485
<b>TOTAL</b>	<b>\$418,922,357</b>

Note: TOTAL Unmet Need consists of IA, PA, SBA TVL, SBA, Business TVL, and Resilience Multiplier

**Unmet Need Per Capita:** The amount of unmet need per capita is an important factor when considering the ability for a county to absorb the fiscal impacts of a disaster. Localities may be able work to recover from disasters by increasing their revenue through tax increases. When looking at the per capita impacts that this will have on communities, the five most impacted counties vary greatly, given their population size. The below table breaks down the total unmet need per capita for each of the five most impacted counties (Table 16).

**Table 16: GRAND TOTAL Unmet Need (UN) Per Capita (USED AS DISTRIBUTION FACTOR)**

County	TOTAL Unmet Need	Population (2015)	TOT UN % of Co Population
Brazoria	\$31,991,708.92	346,312	<b>\$92.38</b>
Fort Bend	\$51,685,073.99	716,087	<b>\$72.18</b>
Harris	\$222,284,270.59	4,538,028	<b>\$48.98</b>
Montgomery	\$65,203,817.90	537,559	<b>\$121.30</b>
Newton	\$47,757,485.19	13,986	<b>\$3,414.66</b>

Note: TOTAL Unmet Need consists of IA, PA, SBA TVL, SBA, Business TVL, and Resilience Multiplier, Source: Population (2015) - <https://www.census.gov/quickfacts/>

As can be seen in the above table, Newton County experienced a much higher unmet need per capita at \$3,414.66, while Harris County shows the lowest unmet need per capita at \$48.98. This can be explained by Harris County’s population exceeding 4.5 million, while Newton County has a population of 13,986.

**Social Vulnerability Index (SoVI) 2010-2014:** An additional component to consider when looking at unmet needs of these five counties is what level of social vulnerability to natural hazards are they experiencing. The Social Vulnerability Index (SoVI) 2010-2014 measures the social vulnerability of counties across the United States — in particular, their vulnerability to environmental hazards. This index, developed by the University of South Carolina’s Hazards & Vulnerability Research Institute, synthesizes 29 socioeconomic variables which contribute to reduction in a community’s ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties. It is a valuable tool because it graphically illustrates the geographic variation in social vulnerability, which in turn contributes greatly to response and recovery capabilities. SoVI shows where there is uneven capacity for disaster preparedness and response, and where resources might be used most effectively to reduce pre-existing vulnerability. The data sources for the development of SoVI come primarily from the United State Census Bureau.

The 2010-2014 SoVI data combines the best available data from both the 2010 U.S. Decennial Census and five-year estimates from the 2010-2014 American Community Survey (ACS). The below table provides the breakdown for the five most impacted counties with relation to their quintile ranking when being ranked within Texas alone, as well as their SoVI raw score and SoVI score modified to account for the range to be above 0, which was critical in using this factor in the weighting methodology (Table 17).

**Table 17: SoVI Score by Most Impacted (MI) County (2010-2014)**

County	Texas Compare-Q	SoVI Score (raw)	Score (Range)
Brazoria	Medium – Low	-3.769999981	5.96
Fort Bend	Low	-5.71999979	4.01
Harris	Medium	0.140000001	9.87
Montgomery	Low	-4.170000076	5.56
Newton	Medium – Low	-0.620000005	9.11

Source: [Social Vulnerability Index: http://artsandsciences.sc.edu/geog/hvri/sovi-data](http://artsandsciences.sc.edu/geog/hvri/sovi-data)

**Distribution of Funds:** In determining the distribution of funds to these counties, the first step was determining the allocation for the most impacted (MI) counties and the rest of the state. As deemed by the Federal Register notice, 80 percent of the total \$238,895,000 would be allocated to the five most impacted counties. This 80 percent amount totals \$191,116,000, leaving a remaining \$44,779,000 for the rest of the State. The State designated 7 percent of these fund for administration (5 percent), planning (2 percent). Table 6 provides a breakdown of these amounts once accounting for administration, planning. The amounts for the MI counties and the rest of the state also consider the amount of funds used for project delivery. The total amount that will be utilized for project delivery is 1 percent for the MI counties and one percent for the rest of the state.

**Table 18: Distribution Breakdown for State of Texas**

Allocation Sector	Amount
Most Impacted Co MOD (5 Counties)	\$154,867,892.08
Most Impacted Co Competition	\$19,000,000
Rest of State Allocation (66 Counties)	\$39,862,156.23
MI Project Delivery (1% of MI Allocation)	\$2,264,562.35
State Project Delivery (1% of State Allocation)	\$566,139.34
Disaster Recovery Reallocation Program (DRRP)	\$5,500,000
State Planning (2%)	\$4,889,500
State Administration (5%)	\$11,944,750
<b>TOTAL</b>	<b>\$238,895,000</b>

The total amount to be allocated to the five most impacted counties is allocated according to a weighted scoring system that took into account three distribution factors. These are total unmet need per county, SoVI score, and total unmet need per capita. Out of a total weighting system of 100 points, the total unmet need was given the highest weight with 50, as it is the most important factor in determining the allocation amount. The Social Vulnerability Index (SoVI) was given the score of 40, being that vulnerability contributes greatly to response capabilities and recovery. Total unmet need per capita was given a weight of 10 in that while there is a great importance tied to the communities' ability to absorb the impact of a disaster, there is not as much weight as total unmet need and community vulnerability to hazards.

To make the raw SoVI scores usable as a distribution factor, the scores were shifted up by 9.73 points (the lowest score in the country was 9.73) to get them all at over 0 and into a positive ranking for use in weighting and factoring in averages. Maximums were determined for each of the three distribution factors. If a factor were to reach its maximum factor, they would receive the full points for that factor weight. See the below table for distribution factors and their respective weights.

**Table 19: Distribution Factors**

Distribution Factor	Maximum Factor	Factor Weight
Total Unmet Need	\$222,284,270.59	50
SoVI Score 2010-2014	25.37	40
Total Unmet Need Per Capita	\$3,414.66	10

The factor weight for each distribution factor was multiplied by the ratio between the county's factor measure and the maximum factor measure. Scores were then provided for each county's distribution factor and the factor scores were then summed. The total score for each county



was then divided by the total score of all counties to get the ratio of the weighted factors, or to get the proportional weighted factor. The below table provides the county scores and their respective ratios with the final column showing the proportional distribution. Through this method, the state was able to effectively distribute funds according to unmet need while also taking into account social and environmental vulnerability as well as a county's capacity to absorb the costs of long-term recovery.

**Table 20: Most Impacted County Proportional Distribution\***

County	Weighted Factor Total	Proportional Weighted Factor	Proportional Distribution
<b>Brazoria</b>	16.86	10.5646676579%	\$16,990,534
<b>Fort Bend</b>	18.16	11.3766565460%	\$18,296,408
<b>Harris</b>	65.71	41.1628126264%	\$66,199,732
<b>Montgomery</b>	23.79	14.9028184946%	\$23,967,327
<b>Newton</b>	35.11	21.9930446751%	\$35,370,121
<b>TOTAL</b>			<b>\$160,824,122</b>

*\*Criteria and allocations in the Disaster Recovery Reallocation Program (DRRP) supersede any conflicting information in this table.*

All funds being allocated directly to the most impacted counties and the rest of Texas will address an unmet housing need or will consist of economic revitalization or infrastructure activities that will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas. This will be accomplished through communities determining their local needs through consultation with community members, leaders, and elected officials. Methods of Distribution (MODs) will be developed locally for those in the HUD most impacted counties.

## **J. Planning Studies**

The HUD appropriation regulation for the CDBG-DR funds requires the State to examine its goals and objectives to promote sound, sustainable long-term recovery planning that is informed by a post-disaster evaluation and coordinated with other local and regional planning efforts. To further the resiliency through the State, the Texas General Land Office will utilize this appropriation to fund urban flood impact initiatives (Studies).

It is expected that not all of the funds allocated here will be spent in direct planning activities. At the conclusion of the Studies, any remaining funds may be used to implement Study-prioritized activities. An Action Plan Amendment may be necessary to transfer planning funds to specific project uses. As required with any Action Plan Amendment, the GLO citizen participation plan will be fully implemented to notify the public of the results of the Study and the specific projects being funded.

## IV. General Requirements

### A. Public Housing, HUD-assisted Housing, and Housing for the Homeless

The GLO's subrecipients will identify and address the rehabilitation, reconstruction, and replacement of the following types of housing affected by the disasters: Public housing (including administrative offices); HUD-assisted housing; McKinney-Vento Homeless Assistance Act-funded shelters and housing for the homeless, including emergency shelters and transitional and permanent housing for the homeless; and private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program. The subrecipients will identify these projects either in the county MODs for the HUD-identified most impacted area counties, or submit the project to the State Competition as applicable.

Various target populations are eligible to be served, including homeless and special needs populations. CDBG-DR funds received by the state will be used in the recovery efforts from the 2016 storms and floods for specific disaster-related purposes. While these funds do not exclude eligibility to homeless individuals or other special needs populations, there are no set-asides specifically for such. It is anticipated that the CDBG-DR funds may address the needs of people with disabilities, and homeless, under the programs developed and administered under this allocation. The state also has various other programs that address the housing needs of these populations that are unrelated to this grant. As stated in the Needs Assessment, Texas has a widespread and robust homeless support services program without the limitation in the service area of the CDBG-DR program.

All proposed projects will undergo AFFH review by the GLO before approval. 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. 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.

### B. Displacement of Persons and/or Entities

To minimize the displacement of persons and/or entities that may be affected by the activities outlined in this Action Plan, the GLO will coordinate with other state agencies, local governments, and local non-profit organizations to ensure minimal displacement. However,

should any proposed projects cause displacement of people, the GLO will ensure grantees follow the requirements set forth under the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as waived.

### **C. Maximum Assistance**

The maximum amount of assistance available under the GLO's disaster recovery program will be the maximum amount allocated to the HUD most impacted counties. Each HUD most impacted county will set the maximum amount of assistance available to a beneficiary under its program. For any residential rehabilitation or reconstruction program, the GLO's housing guidelines establish housing assistance caps. Subrecipients establish housing assistance caps for their rehabilitation or reconstruction programs equal to or less than the GLO's housing assistance caps. A waiver request must be submitted to the GLO if subrecipients' housing assistance caps exceed the GLO's housing assistance caps. The GLO will evaluate each housing assistance waiver request for cost effectiveness.

### **D. Elevation Standards**

The GLO will apply the following elevation standards to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA's data source identified in 24 CFR 55.2(b)(1). All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the annual (or 100-year) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b) (10), must be elevated with the lowest floor, including the basement, at least two feet above the annual floodplain elevation. Residential structures with no dwelling units and no residents below the annual floodplain, must be elevated or flood proofed, in accordance with FEMA flood proofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the annual floodplain. Applicable state, local, and tribal codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, will be followed.

### **E. Planning and Coordination**

The GLO's recovery projects will be developed in a manner that considers an integrated approach to housing, infrastructure, economic revitalization, and overall community recovery that will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas. The GLO will continue to work with state and local jurisdictions to provide guidance on promoting a sound short- and long-term recovery plan in the affected areas by

coordinating available resources to help in the restoration and recovery of damaged communities. Disaster recovery presents affected communities with unique opportunities to examine a wide range of issues such as housing quality and availability, road and rail networks, environmental issues, and the adequacy of existing infrastructure. The GLO will support long-term plans put in place by local and regional communities that promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible floodplain management and consider continued sea level rise, if applicable. This information should be based on the history of FEMA flood mitigation efforts, and take into account projected increase in sea level (if applicable) and frequency and intensity of precipitation events, which are not considered in current FEMA maps and National Flood Insurance Program premiums.

The GLO will coordinate as much as possible with local and regional planning efforts to ensure consistency, to promote community-level and/or regional (e.g., multiple local jurisdictions) post-disaster recovery and mitigation, and to leverage those efforts.

In this Action Plan the GLO has allocated 2 percent of the budget for planning that addresses long-term recovery and pre- and post-disaster hazard mitigation for a statewide flood plan, with an emphasis on the HUD most impacted counties.

## **F. Infrastructure Activities**

The GLO will encourage subrecipients to integrate mitigation measures into rebuilding activities and the extent to which infrastructure activities funded through this grant will achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction.

The GLO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects.

The GLO will seek to ensure that infrastructure activities will avoid disproportionate impact on vulnerable communities and create opportunities to address economic inequities facing local communities by all project applications undergoing an AFFH review by the GLO before approval. 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. 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.

The GLO will coordinate with federal, state, local, private, and nonprofit sources to assist subrecipients to align investments with other planned state or local capital improvements and infrastructure development efforts, and will work to foster the potential for additional infrastructure funding from multiple sources, including existing state and local capital improvement projects in planning, and the potential for private investment.

The GLO will rely on professional engineers procured by the subrecipients to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

## **G. Leveraging Funds**

The GLO will encourage subrecipients to leverage CDBG-DR funds with funding provided by other federal, state, local, private, and nonprofit sources to utilize the limited CDBG-DR funds fully. The GLO will report on leverage funds in the DRGR system.

## **H. Protection of People and Property**

### **1. Quality Construction Standards**

The GLO will require both quality inspections and code compliance inspections on all projects. Site inspections will be required on all projects to ensure quality and compliance with building codes. The GLO will encourage and support subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable. In the project application, subrecipients will submit an explanation of current and the future planned codes to mitigate hazard risks. The GLO will provide technical guidance on hazard mitigation code examples.

For reconstruction or new construction of residential buildings, the GLO will follow the ENERGY STAR program for Green Building Standards. For rehabilitation of non-substantially damaged residential buildings, the GLO will follow the guidelines to the extent applicable specified in the HUD CPD Green Building Retrofit Checklist. For infrastructure projects, the GLO will encourage, to the extent practicable, implementation of green building practices.

### **2. Housing Contractors Standards**

The GLO will establish standards in the request for qualifications (RFQ) for housing contractors, and encourage subrecipients to do the same. The standards will include, but not be limited to, information on the company's organizational structure and capabilities, ability to perform, recent construction projects completed or underway over the past five years, performance and payment bond capacity, financial statements for the past two years, evidence of insurance coverage, and business registrations, certifications, and licenses. The GLO will require

subrecipients to utilize builders qualified through the RFQ process, or use local procurement methods to qualify contractors. To ensure full and open competition, subrecipients are required at a minimum to follow 24 CFR 570.489(g). The GLO will monitor subrecipient procurement. The GLO will require a warranty period post-construction for housing. All work performed by the contractor will be guaranteed for a period of one year.

### **3. Appeals Processes**

The GLO responds to complaints and appeals in a timely and professional manner to maintain a quality level of operations. The GLO's Appeals Processes apply to appeals received from homeowners, contractors, cities, counties, and housing authorities, among others. The GLO will respond to homeowners by coordinating with the subrecipients and/or housing contractors to resolve homeowners' issues.

A record of each complaint or appeal that the GLO receives is kept in an information file. When a complaint or appeal is received, the GLO will respond to the complainant or appellant within 15 business days where practicable. For expediency, the GLO will utilize telephone communication as the primary method of contact; email and postmarked letters will be used as necessary to document conversations and transmit documentation.

Information about the complainant's rights and how to file a complaint shall be printed on all program applications, guidelines, the GLO public website, and subrecipient websites in all local languages, as appropriate and reasonable. Procedures for appealing a GLO decision on a complaint shall be provided to complainants in writing as part of the complaint response.

### **4. Dam and Levee Requirements**

*As stated in the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, CDBG-DR funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. The GLO will ensure that if subrecipients use CDBG-DR funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Program (Levee Rehabilitation and Improvement Program), and (3) ensure the structure is accredited under the FEMA National Flood Insurance Program. The GLO will upload into DRGR system the exact location of the structure and the area served and protected by the structure, and maintain file documentation demonstrating that the grantee has conducted a risk assessment prior to funding the flood control structure and that the investment includes risk reduction measures.*

#### **I. Program Income**

Any program income earned as a result of activities funded under this grant will be subject to alternate requirements of 24 CFR §570.489(e), which defines program income. Program income

generated under individual contracts with the sub-grantees will be returned to the GLO. At the GLO's discretion, program income could be allowed to remain with a community to continue recovery efforts.

## **J. Monitoring Standards**

The GLO provides program-wide oversight and monitoring activities for all applicable CDBG and related federal requirements in its administration of the CDBG-DR Program. The GLO will provide technical assistance to recipients from the application stage through the completion of the projects to ensure that funds are appropriately used for the CDBG-DR activities, as well as meeting one of the three national objectives.

The GLO will monitor all contract expenditures for quality assurance and to prevent, detect, and eliminate fraud, waste, and abuse as mandated by Executive Order (EO) RP 36, signed July 12, 2004, by the Governor of Texas. The GLO will particularly emphasize mitigation of fraud, abuse, and mismanagement related to accounting, procurement, and accountability which may also be investigated by the State Auditor's Office (SAO). In addition, the GLO and the grantees are subject to Uniform Guidance Standards of 2 CFR 200 which encompasses the review of compliance with program requirements and the proper expenditure of funds by an independent Certified Public Accountant (CPA), or by the SAO. Reports from the SAO's office will be sent to the Office of the Governor, the Legislative Committee, and the GLO.

The GLO has an internal audit staff that performs independent internal audits of programs and can perform such audits on these programs and grantees. The GLO will utilize a monitoring plan to specifically ensure that the recovery allocation is carried out in accordance with state and federal laws, rules, and regulations, as well as the requirements set forth in the Federal Register Notices. The monitoring plan will also include duplication of benefits review to ensure compliance with the Stafford Act.

## **K. Broadband Infrastructure**

As required by the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, any new construction or substantial rehabilitation, as defined by 24 CFR 5.100, of a building with more than four rental units will include installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100, except where the grantee documents that: (i) the location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible; (ii) the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or (iii) the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.



# V. State Administered Disaster Recovery Program

## A. Action Plan

The Action Plan describes the following activities related to disaster relief, long-term recovery, and restoration of housing, replacing affected public school, infrastructure, and economic revitalization in the most impacted and distressed areas affected by the severe storms, tornadoes, straight-line winds, and flooding disasters occurring during 2016:

- Citizen participation process used to develop the Action Plan;
- Eligible affected areas and applicants, and the methodology used to distribute funds to those applicants;
- Activities for which funding may be used; and
- Grant procedures that will be applicable to ensure program requirements, including non-duplication of benefits.

As required by the Federal Register notice, Vol. 81, No. 224, Monday, November 21, 2016, the Action Plan allows the GLO “to allocate funds to address unmet economic revitalization and infrastructure needs, but in doing so, the grantee must identify how unmet housing needs will be addressed or how its economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.”

As additional information becomes available through the grant administration process, amendments to this Action Plan are expected. Prior to adopting any substantial amendment to this Action Plan, the GLO will publish the proposed plan or amendment on the GLO’s official website and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment’s contents. At a minimum, the following modifications will constitute a substantial amendment:

- A change in program benefit or eligibility criteria;
- The allocation or reallocation of more than \$1 million; or
- The addition or deletion of an activity.

## **B. Program Budget**

### **1. Grant Allocations**

Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of housing, replacing affected public school, infrastructure, and economic revitalization in the impacted and distressed Texas counties as declared in DR-4266, DR-4269, and DR-4272.

As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, and Vol. 82, No. 150, Monday, August 7, 2017, the GLO will allocate 80 percent of both allocations to address unmet needs within the HUD-identified 'most impacted and distressed' areas.

The GLO will ensure, as is required and identified in the Federal Register, that at least 70 percent of the entire CDBG Disaster Recovery grant award will be used for activities that benefit low- and moderate-income persons.

### **2. Administrative Funds**

State administrative costs will not exceed five percent. Planning and administrative costs combined will not exceed 20 percent. The provisions outlined under 42 U.S.C. 5306(d) and 24 CFR §570.489(a)(1)(i) and (iii) will not apply to the extent that they cap state administration expenditures and require a dollar-for-dollar match of state funds for administrative costs exceeding \$100,000. Pursuant to 24 CFR §58.34(a)(3), except for applicable requirements of 24 CFR §58.6, administrative and management activities are exempt activities under this Action Plan. Once contracted, the GLO will allow the drawdown of pre-agreement costs associated with eligible disaster recovery activities dating back to the date of the disaster(s) for subrecipients and the GLO with appropriate documentation.

### **3. Thresholds Factors and Grant Size**

There must be a specific disaster-related need directly attributable to the major natural disaster declaration for severe storms, tornadoes, straight-line winds, and flooding disaster relief, long-term recovery and/or restoration of housing and infrastructure (DR-4266, DR-4269, and DR-4272). No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.

- HUD Most Impacted Area Counties

The grant size established for this Action Plan for the most impacted counties is a \$100,000 minimum-allocation size; the maximum allocation size is the total allocated to the county in the HUD MID County Method of Distribution.

The proposed contract start dates for subrecipients is August/September 2017, and the proposed contract end dates for subrecipients is August/September 2019.

### **C. Eligibility and Award Method**

According to HUD, only those that were within the disaster-declared counties of DR-4266, DR-4269, and DR-4272 are eligible to receive assistance under this grant. The GLO will potentially utilize all three national objectives to carry out all programs under this allocation. Only mitigation measures related to repairing damage caused by severe storms, tornadoes, straight-line winds, and flooding will be considered for funding.

#### **1. Eligible Applicants**

Counties, cities, housing authorities, and both non-profit and for-profit organizations located in the 71 impacted counties are eligible applicants. For the most impacted county of Newton, Deweyville Independent School District shall be an eligible applicant as named as a direct recipient under the Newton County Method of Distribution.

#### **2. Eligible Activities**

Housing Activities: Housing activities allowed under CDBG-DR include, but are not limited to:

- Single family and multifamily repair, rehabilitation, and/or new construction;
- Repair and replacement of manufactured housing units;
- Hazard mitigation;
- Elevation;
- Buyouts;
- Demolition only;
- Planning activities related to housing; and
- Other activities associated with the recovery of housing stock impacted.

Non-Housing Activities: All activities allowed under CDBG-DR, including but not limited to:

- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, drainage, bridges, etc.);

- Demolition, rehabilitation of publicly or privately owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap); and
- Eligible planning, urban environmental design, and policy-planning-management-capacity building activities as listed in §570.205 within the 15 percent cap).

### **3. Ineligible Activities**

Ineligible activities identified in the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, are the use of CDBG-DR for forced mortgage payoff, construction of dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes and activities identified in 24 CFR 570.207. All activities and uses authorized under Title I of the Housing and Community Development Act of 1974, allowed by waiver, or published in the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, are eligible.

#### **D. Method of Distribution**

As required by the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, Federal Register, Vol. 82, No. 11, Wednesday, January 18, 2017, and Federal Register, Vol. 82, No. 150, Monday, August 7, 2017, the GLO will allocate 80 percent of both allocations to the HUD-identified “most impacted and distressed” areas. The HUD-identified “most impacted and distressed” areas consist of Brazoria, Fort Bend, Harris, Montgomery, and Newton County. The GLO will require each “most impacted and distressed” area to submit to the GLO a county Method of Distribution (MOD).

The amount each “most impacted and distressed” area is allocated is based on the formula allocation detailed in the Need Assessment section of this Action Plan.

The remaining 20 percent of allocations will be detailed in an amendment to this Action Plan.

#### **1. HUD Most Impacted County Method of Distribution (MOD)**

The specific distribution of funds will be determined by the five locally adopted county MODs. The five HUD-identified “most impacted and distressed” areas of Brazoria, Fort Bend, Harris, Montgomery, and Newton County will develop MODs for their county’s allocation.

Each most impacted county, including eligible cities and public housing authorities within those counties, are eligible to be allocated funds with the MOD. For the most impacted county of Newton, Deweyville Independent School District shall be an eligible applicant. Cities, housing authorities, and impacted school districts located within these counties are encouraged to participate in the development of the MOD.

County Methods of Distribution were locally driven processes that utilized data, public planning meetings, public hearings, public comment, citizen advisory committees, surveys, mailout programs, and local expertise to define the use of the monies allocated to each County. The GLO provided datasets utilized to allocate the funds from a State perspective but did not require the Counties use the same allocation to account for local needs. The GLO participated in and reviewed the MODs submitted by the most impacted counties and found the methodologies to be objective and in line with data locally determined to be representative of the recovery needs of each County.

Each “most impacted” county MOD criteria will include the following:

- Established objective criteria for allocation of funds to eligible entities or projects;
- Any project-type priorities;
- A plan to meet the 70 percent low-to-moderate income benefit requirement;
- How unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas;
- Minimum grant size of \$100,000 and maximum grant size of the total amount allocated to the county;
- Must conduct at least one public planning meeting and two public hearings.
- Description of efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages.
- Explanation of how the region’s method of distribution fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing and the local economy.
- Plan of how unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas.
- The County is required to prepare a method of distribution between the eligible entities or projects. The GLO has directed the County to use a direct allocation technique based on objective, verifiable data. The Method of Distribution will identify how it meets benefiting 70 percent low-to-moderate persons requirement, supports minimum allocation amounts that help ensure project feasibility, and provides an explanation of the distribution factors selected.
- All subrecipients will certify that they will affirmatively further fair housing (“AFFH”) in their grant agreements, and will receive GLO technical assistance in meeting their

AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval. 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, non-minority areas in response to natural hazard related impacts.

**Table 21: MOD Distribution of Most Impacted\***

<b>County</b>	<b>Housing</b>	<b>Infrastructure</b>	<b>Total Allocation</b>
Brazoria	\$699,054	\$16,291,480.00	<b>\$16,990,534.00</b>
Fort Bend	\$10,636,203.35	\$7,660,204.65	<b>\$18,296,408.00</b>
Harris	\$36,329,837.00	\$29,869,895.00	<b>\$66,199,732.00</b>
Montgomery	\$8,919,523.20	\$15,047,803.80	<b>\$23,967,327.00</b>
Newton	\$10,447,771.22	\$24,922,349.78	<b>\$35,370,121.00</b>

*\*Criteria and allocations in the Disaster Recovery Reallocation Program (DRRP) supersede any conflicting information in this table.*

All MODs can be found on the 2016 Floods and Storms Action Plan section of the recovery website: <https://recovery.texas.gov/action-plans/2016-floods/index.html>

**Brazoria County MOD**

Brazoria County developed a MOD that allocated 10 percent of the funding directly to housing specific elevation, repair, rehabilitation, and buyout activities and 90 percent to drainage projects that reduce flooding in LMI areas to reduce impacts of flooding on housing, personal property and public infrastructure. Brazoria County targeted these needs to foster long-term recovery for residential areas that were most impacted by high water and failure of targeted drainage. Per State data the estimated housing need \$3.8 million (Table 9), of the overall \$32 million (Table 15) need for Brazoria County would yield a 12 percent direct housing need. When considering the overall population of the County 38 percent is LMI. Originally the County focused on housing activities on LMI populations, so they planned on funding \$1,699,053.40 to direct housing activities and related project expenses. This amount would address the remaining unmet housing need for the LMI population. The remaining \$15,291,480.60 would have made improvements to targeted drainage systems impacted by highwater and failures in the 2016 flood event. The County issued an amendment (MOD Amendment 1) to the MOD stating that any additional allocation will be divided in the same proportion between infrastructure and housing as in the original Method of Distribution Allocation Summary

without requiring further amendment. The County issued a second amendment to the MOD in 2023. This amendment moved \$999,999 from the housing allocation to the infrastructure allocation due to a lack of qualified applicants for the housing program and a subsequent surplus of housing funds. The County also added single-family housing replacement and street improvements as eligible activities.

### **Fort Bend County MOD**

In order to prevent residents in floodways and floodplains from being impacted by future flooding incidents, Fort Bend County designated 58 percent of the funds to county-wide housing projects. The county will focus on LMI homeowners with their elevation and property acquisition efforts for flood-prone properties. The remaining 42 percent of the funding will be used to correct damage or failure to function of critical infrastructure and improve drainage systems in the disaster impacted areas for long-term protection of houses and businesses. The infrastructure projects will help to halt the decrease in property value experienced by homeowners in the impacted areas. The MOD designates any increase in CDBG-DR funds to housing projects.

### **Harris County MOD**

Harris County focused on key systems in their MOD in order to correct damage, alleviate future flooding, and increase public safety. Housing funding, which is 55 percent after the Harris County MOD Amendment 1, was previously 35 percent of the total allocation. The housing funds will be used to implement a program to repair single-family and multifamily units and to buyout repetitively flooded housing, particularly for low-income homeowners. Rental unit repair will be a focus because affordable rental housing is in short supply, especially in impacted areas. The 45 percent of funds going to infrastructure will be used for drainage projects, hardening of community facilities within flood zones, and repair of flooded roadways to improve accessibility of residents and first responders in impacted areas.

### **Montgomery County MOD**

Montgomery County developed a MOD based on a County wide survey that allocated 37 percent to direct housing related activities and 63 percent to drainage, sewer and road repair, and FEMA match specifically related to low-income neighborhoods. The intent being to remediate systems that failed and leverage additional funds to the County. Many smaller communities had indicated the cost share requirement was likely to prohibit them from being able to accept Public Assistance funds. Montgomery then identified a total of 976 LMI homeowners that currently have remaining unmet housing need through FEMA data and property assessments performed by County staff. The County will manage the housing program and one drainage project. Eight communities were allocated funds for infrastructure projects based on their Public Assistance values and poverty amounts. All infrastructure projects will be supportive of housing.

## **Newton County MOD**

Newton County developed a MOD that allocated 70 percent of their funding to housing to include replacement of an elementary school lost in the flooding and 30 percent to infrastructure based on the results of a county wide survey. The survey identified housing to be the highest most urgent unmet need followed by infrastructure to alleviate future flooding. The MOD also calls for a comprehensive master plan for the County that will focus on construction standards with an eye toward mitigation, resiliency, and permanent restoration.

Newton County amended MOD through Amendment 1 because there is no remaining unmet housing need in the 2016 Floods Newton County housing program. Underutilized housing funds will be reallocated from housing to infrastructure activities in the Newton County's MOD. Newton County also moved the Deweyville ISD funds from housing to infrastructure. Newton County's MOD amendment reallocated \$14,311,313.78 from housing activities to infrastructure activities.

## **2. HUD Most Impacted County Competition**

The GLO will conduct a HUD most impacted county competition for entities located the 5 impacted counties – Brazoria, Fort Bend, Harris, Montgomery, and Newton – identified by HUD as a most-impacted area county. Eligible applicants will include counties, cities, housing authorities, and both non-profit and for-profit organizations located in the 5 HUD most impacted counties that received DR-4266, DR-4269, or DR-4272 Presidential disaster declarations. Entities not located in the 2016 most-impacted counties (Brazoria, Fort Bend, Harris, Montgomery, and Newton) are not eligible to apply.

The HUD most impacted Competition will include the following:

- Eligible Activity. Project applications will be accepted for the acquisition and/or demolition of real property. Flood and drainage improvements will also be considered an eligible activity.
- Established objective scoring criteria.
- The State must meet the 70 percent low-to-moderate income benefit requirement.
- The minimum application amount is \$5,000,000 and the maximum application amount is the full budgeted amount for this competition.
- Each application may contain only one project. A project is defined as a discrete combination of: entity (e.g., city or county), activity (e.g., acquisition or drainage), beneficiary population, and national objective.
- Each applicant may submit a total of 2 applications. Depending on demand, no applicant will be awarded a subsequent application, until all eligible applicants have been awarded at least once.



- Each project must identify how activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas.
- If there is an under subscription in the competition, the GLO may request a waiver from HUD and amend the Action Plan to utilize funds based on the response.

1. What is the applicant’s rate of FEMA Public Assistance (PA) per capita?	20 points
2. Does the project meet the low-to-moderate income (LMI) HUD National Objective?	35 points
3. Was the applicant included in one or more of the DR-4266, DR-4269 and DR-4272 Presidential Disaster Declarations?	20 points
4. What is the applicant’s county Social Vulnerability Index (SoVI) Score?	15 points
6. Is the applicant leveraging funds from other source(s)?	5 points
7. Is the applicant a public housing authority?	5 points
Total 100 points	
(Tie-Breaker) What is the poverty rate of the Census geographic area?	

1. Per capita damage (What is the applicant's rate of FEMA Public Assistance (PA) per capita?)

Data Source: HUD 2019 LOWMOD Income Data and Appendix D — FEMA Public Assistance Projected Project Amount  
 Maximum 20 Points

Methodology: The latest available amount of all FEMA Public Assistance (PA) of the total for DR-4266, DR-4269 and DR-4272 for the applicant, as of 7/17/2017, as provided by the Texas Division of Emergency Management, will be divided by the total population for the applicant to determine the amount of damages per capita. This average amount of damage per capita will be divided by a factor of 2.5, which determines the raw score to two decimal places. Up to a score of 20, the raw score is equal to the actual score. The maximum score is capped at 20 points. A raw score of 20 or more will equate to an actual score of 20.

- County Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column
- The FEMA PA projected project amount for a county applicant will be calculated as the amount listed for the county. If the county is applying to serve the entire the county including the cities located within the county, the county FEMA PA amount and the cities FEMA PA amounts will be combined.

- County population: 2019 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv"
- City Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, " DR-4266, DR-4269 and DR-4272" Column. The FEMA PA projected project amount for the city will be calculated as the amount listed for the city.
- City population: 2019 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv"
- Public Housing Authority Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column. The FEMA PA projected project for the public housing authority applicants will be calculated as the amount listed for the public housing authority applicant.
- Public Housing Authority Populations: 2019 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv" The public housing authority applicant population is the population of the jurisdiction the housing authority is located.
- Multi-jurisdiction Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column For a multi-jurisdiction application, the FEMA PA projected project amount for both jurisdictions will be combined.
- Multi-jurisdiction Applicants Populations: 2019 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv" For a multi-jurisdiction application, the jurisdictions populations will be combined, unless the jurisdictions are a county and a city located within the county, then the county population will be used.

2. Does the project meet the low-to-moderate income (LMI) HUD National Objective?

Data Source: HUD 2019 LOWMOD Income Data

Maximum 35 Points

Methodology: The project meets the low-to-moderate income (LMI) HUD National Objective. Project beneficiary information will be reviewed to determine the HUD National Objective. For non-profit and for-profit initiated projects, the LMI determination will be based on the service area that best aligns with the project, either the city or county level.

3. Was the applicant included in one or more of the DR-4266, DR-4269 and DR-4272 Presidential Disaster Declarations?

Data Source: FEMA Disaster Declarations Maps and Lists

Maximum 20 Points

Methodology: Applicant is located within a county that received Presidential Disaster Declarations DR-4266, DR-4269 and/or DR-4272.

DR-4266 Only = 5 Points  
DR-4269 Only = 5 Points  
DR-4272 Only = 5 Points

2 Only = 15 Points  
DR-4266, DR-4269 and DR-4272 = 20 Points

4. What is the applicant's county Social Vulnerability Index (SoVI) Score?  
Data Source: Social Vulnerability Index (SoVI) Score by County, Appendix E

Maximum 15 Points

Methodology: Score will be based on SoVI score from most recent year data provided. The county SoVI score will be divided by the maximum Texas County SoVI score and then multiplied by the maximum points (15) to get the final score for that county.

- $(\text{County Score} / \text{Maximum Texas County SoVI Score}) \times 15 = \text{County Score}$
- Note: SoVI Scores presented in Appendix E have been shifted to represent a positive number for scoring purposes.

5. Is the applicant leveraging funds from other source(s)? (2015 CDBG-DR funds, 2016 CDBG-DR, and Harvey CDBG-DR are ineligible to be used as leverage for scoring purposes.)

Data Source: Letter of Commitment from State, Federal, or other sources

Maximum 5 Points

Methodology: The commitment letters from a State source, Federal Source or other outside sources will be reviewed to determine the amount of leveraged funds injected into the project. In order to receive points under this criterion, the leveraging must have a minimum value of 1 percent of the CDBG-DR funds requested. For purposes of this criterion, leveraged funds include equipment, materials, and cash from the applicant and sources from other than the requesting entity. The 2015 CDBG-DR, 2016 CDBG-DR, and Harvey CDBG-DR funds are ineligible to be used as leverage for scoring purposes.

To calculate the leverage minimum, the following formula will be used:

$\text{Leveraged Funds} / \text{CDBG-DR Funds Requested} = \text{Percent Leveraged}$

6. Is the applicant a public housing authority?

Data Source: Application, 424 Form

Maximum 5 Points

Yes = 5 points No = 0 points

(Tie-Breaker) What is the poverty rate of the census geographic area?

Data Source: 2017 ACS 5-year Table B17001

Methodology: Poverty rate is determined by reviewing the U.S. Census 2015 American Communities Survey (ACS) 5- year estimate, table B17001 for the census geographic area. Once this information is obtained for each applicant and the target area identified on the census map, the poverty rate for each applicant is calculated by dividing the total number of persons at or below the designated poverty level by the population from which poverty persons was determined. The poverty rate is calculated up to two decimal points.

If the target area(s) encompasses more than one census geographic area (such as two or more Census Tracts) the poverty rate shall be calculated as follows: the sum of the total number of persons at or below the designated poverty level of all census geographic areas in the target area divided by the sum of the total population from which poverty persons were determined from all Census geographic areas in the target area.

If needed in the ranking of applications based on available funds remaining, a tie between multiple applications shall be broken based poverty rate ranking with the highest poverty rate ranking higher.

### **3. State Competition (Complete)**

The GLO conducted a State competition for entities located in the remaining 66 impacted counties that were not identified by HUD as a most-impacted area county. Eligible applicants included counties, cities, and housing authorities located in the 66 impacted counties that received DR-4266, DR-4269, or DR-4272 Presidential disaster declarations are eligible to apply. Entities located in the 2016 most-impacted counties (Brazoria, Fort Bend, Harris, Montgomery, and Newton) are not eligible to apply.

The State Competition will include the following:

- Established objective scoring criteria.
- All CDBG-DR activities will be eligible.
- The State must meet the 70 percent low-to-moderate income benefit requirement.
- The minimum application amount is \$100,000 and the maximum application amount is \$2 million.

- Each application may contain only one project.
- Each applicant may submit a total of 2 applications. Depending on demand, no applicant will be awarded a second application, until all eligible applicants have been awarded at least once.
- Each project must identify how unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas.
- Infrastructure and housing project applications will be accepted. Applications for housing activities will receive first priority over infrastructure applications until at least 60 percent of the funds set aside for this competition have been expended on direct housing activities.
- If there is an under subscription in the competition, the GLO may request a waiver from HUD and amend the Action Plan to utilize funds based on the response.

1. What is the applicant’s rate of FEMA Public Assistance (PA) per capita?	10 points
2. Does the project meet the low-to-moderate income (LMI) HUD National Objective?	35 points
3. Was the applicant included in one or more of the DR-4266, DR-4269 and DR-4272 Presidential Disaster Declarations?	20 points
4. What is the applicant’s county Social Vulnerability Index (SoVI) Score?	15 points
5. What is the change in employment from the 1st Quarter 2016 to the 1st Quarter 2017 for the applicant’s county?	10 points
6. Is the applicant leveraging funds from other source(s)?  (2015 CDBG-DR funds are ineligible to be used as leverage for scoring purposes.)	5 points
7. Is the applicant a public housing authority?	5 points
Total	100 points
(Tie-Breaker) What is the poverty rate of the Census geographic area?	

1. Per capita damage (What is the applicant's rate of FEMA Public Assistance (PA) per capita?)

Data Source: HUD 2016 LOWMOD Income Data and Appendix D — FEMA Public Assistance Projected Project Amount

Maximum 10 Points

Methodology: The latest available amount of all FEMA Public Assistance (PA) of the total for DR-4266, DR-4269 and DR-4272 for the applicant, as of 7/17/2017, as provided by the Texas Division of Emergency Management, will be divided by the total population for the applicant to determine the amount of damages per capita. This average amount of damage per capita will be divided by a factor of 2.5, which determines the raw score to two decimal places. Up to a score of 10, the raw score is equal to the actual score. The maximum score is capped at 10 points. A raw score of 10 or more will equate to an actual score of 10.

County Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column

The FEMA PA projected project amount for a county applicant will be calculated as the amount listed for the county. If the county is applying to serve the entire the county including the cities located within the county, the county FEMA PA amount and the cities FEMA PA amounts will be combined.

County population: 2016 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv"

City Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, " DR-4266, DR-4269 and DR-4272" Column. The FEMA PA projected project amount for the city will be calculated as the amount listed for the city.

City population: 2016 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv"

Public Housing Authority Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column. The FEMA PA projected project for the public housing authority applicants will be calculated as the amount listed for the public housing authority applicant.

Public Housing Authority Populations: 2016 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv" The public housing authority applicant population is the population of the jurisdiction the housing authority is located.

Multi-jurisdiction Applicants FEMA PA Projected Project Amount: Amendment 1, Appendix D, "DR-4266, DR-4269 and DR-4272" Column For a multi-jurisdiction application, the FEMA PA projected project amount for both jurisdictions will be combined.

Multi-jurisdiction Applicants Populations: 2016 LMISD spreadsheet, Local Units of Government Tab, Column I "lowmoduniv" For a multi-jurisdiction application, the jurisdictions populations will be combined, unless the jurisdictions are a county and a city located within the county, then the county population will be used.

2. Does the project meet the low-to-moderate income (LMI) HUD National Objective?

Data Source: 2016 Infrastructure or Housing Application Table 1

Maximum 35 Points

Methodology: The project meets the low-to-moderate income (LMI) HUD National Objective. Project beneficiary information will be reviewed to determine the HUD National Objective.

3. Was the applicant included in one or more of the DR-4266, DR-4269 and DR-4272 Presidential Disaster Declarations?

Data Source: FEMA Disaster Declarations Maps and Lists

Maximum 20 Points

Methodology: Applicant is located within a county that received Presidential Disaster Declarations DR-4266, DR-4269 and/or DR-4272.

DR-4266 Only = 5 Points

DR-4269 Only = 5 Points

DR-4272 Only = 5 Points

2 Only = 15 Points

DR-4266, DR-4269 and DR-4272 = 20 Points

4. What is the applicant's county Social Vulnerability Index (SoVI) Score?

Data Source: Social Vulnerability Index (SoVI) Score by County, Appendix E

Maximum 15 Points

Methodology: Score will be based on SoVI score from most recent year data provided. The county SoVI score will be divided by the maximum Texas County SoVI score and then multiplied by the maximum points (15) to get the final score for that county.

- $(\text{County Score}/\text{Maximum Texas County SoVI Score}) \times 15 = \text{County Score}$
- Note: SoVI Scores presented in Appendix E have been shifted to represent a positive number for scoring purposes.

5. What is the change in employment from the 1st Quarter 2016 to the 1st Quarter 2017 for the applicant's county?

Data Source: Texas Workforce Commission's (TWC) Quarterly Census of Employment and Wages (QCEW) for the 1st Quarter of 2016 and the 1st Quarter of 2017 Change in Employment Data Worksheet.

Maximum 10 Points

Methodology: Employment figures for all industries, both public and private, for the 1st Quarter of 2016 and the 1st Quarter of 2017 are obtained from the Texas Workforce Commission's (TWC) Quarterly Census of Employment and Wages (QCEW) for each county in the region. Cities are scored on the rates for the county in which they are located. The percent of change in each county (increase/decrease) from the 1st Quarter 2016 to the 1st Quarter of 2017 is then calculated.

$[(Q1\ 2017 - Q1\ 2016)/(Q1\ 2016)] \times 100 = \% \text{ Increase or Decrease}$

Points are then awarded based upon the following scale:

- No decrease = 0 points
- Decrease up to 1.99% = 2 points
- Decrease 2.00% to 2.99% = 4 points
- Decrease 3.00% to 3.99% = 6 points
- Decrease 4.00% to 5.99% = 8 points
- Decrease 6.00% and over = 10 points

6. Is the applicant leveraging funds from other source(s)? (2015 CDBG-DR funds are ineligible to be used as leverage for scoring purposes.)

Data Source: Letter of Commitment from State, Federal, or other sources

Maximum 5 Points

Methodology: The commitment letters from a State source, Federal Source or other outside sources will be reviewed to determine the amount of leveraged funds injected into the project. In order to receive points under this criterion, the leveraging must have a minimum value of 1 percent of the CDBG-DR funds requested. For purposes of this criterion, leveraged funds include equipment, materials, and cash from the applicant and sources from other than the



requesting entity. The 2015 CDBG-DR funds are ineligible to be used as leverage for scoring purposes.

To calculate the leverage minimum, the following formula will be used:

Leveraged Funds/CDBG-DR Funds Requested = Percent Leveraged

7. Is the applicant a public housing authority?

Data Source: Application, 424 Form

Maximum 5 Points

Yes = 5 points No = 0 points

8. (Tie-Breaker) What is the poverty rate of the census geographic area?

Data Source: 2015 ACS 5-year Table B17001

Methodology: Poverty rate is determined by reviewing the U.S. Census 2015 American Communities Survey (ACS) 5- year estimate, table B17001 for the census geographic area. Once this information is obtained for each applicant and the target area identified on the census map, the poverty rate for each applicant is calculated by dividing the total number of persons at or below the designated poverty level by the population from which poverty persons was determined. The poverty rate is calculated up to two decimal points.

If the target area(s) encompasses more than one census geographic area (such as two or more Census Tracts) the poverty rate shall be calculated as follows: the sum of the total number of persons at or below the designated poverty level of all census geographic areas in the target area divided by the sum of the total population from which poverty persons were determined from all Census geographic areas in the target area.

If needed in the ranking of applications based on available funds remaining, a tie between multiple applications shall be broken based poverty rate ranking with the highest poverty rate ranking higher.

#### **E. Disaster Recovery Reallocation Program (DRRP)**

The State of Texas, as one of the states most affected by disasters across the country, consistently has insufficient funding to fully recover from its disasters. It is also the case that programs and subrecipients do not individually fully utilize all allocated funds. This Disaster Recovery Reallocation Program is designed to support the reallocation of those deobligated and unutilized funds for much needed further recovery for disasters that occurred in 2008, 2015, 2016, 2017, 2018, and 2019. The Disaster Recovery Reallocation Program (DRRP) is designed to

utilize these deobligated and unutilized amounts to provide the opportunity for communities with outstanding unmet need to access remaining CDBG-DR funds.

This program is designed to utilize remaining program funds from current disaster recovery grants from 2008 to 2019, with the exception of the 2011 Wildfires grant, and expedite the expenditure of funds to comply with HUD's timely expenditure requirements through a call for projects across multiple grants. Each project will undergo eligibility analysis based on the grant that will be used to fund it.

As funds continue to be identified through the deobligation process, they will be added to this program. All remaining funds will be reallocated to this program for each grant.

The Disaster Recovery Reallocation Program (DRRP) supersedes any conflicting criteria of the Action Plan, as amended, while addressing the appropriate reallocation of unutilized funds that will be used in the DRRP.

### **1. Allocation Amount: \$5,500,000**

The GLO will ensure that DRRP-funded projects maintain overall HUD MID expenditures and LMI aggregate requirements.

### **2. Award Amount**

- i. Maximum Award: \$2,000,000.
- ii. Minimum Award: \$500,000.

### **3. Eligible Entities**

Units of local government (cities and counties), Indian Tribes, and public housing authorities.

### **4. Eligible Activities**

- i. Flood and drainage improvements.
- ii. Water and wastewater improvements.
- iii. Street improvements.
- iv. Rehabilitation, reconstruction, and new construction of affordable multifamily projects.
- v. Permanently affixed emergency communications equipment.

## 5. Ineligible Activities

Any activity not listed above.

## 6. Program Fund Restrictions

- i. CDBG-DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-DR funds for levees and dams are required to:
  - a. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory on Dams;
  - b. Ensure that the structure is admitted in the USACE PL 84-99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
  - c. Ensure the structure is accredited under the FEMA NFIP; and
  - d. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- ii. Funds may not be used to assist a privately owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a coop of municipally owned utility).
- iii. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by FEMA, the USACE, insurance, or another source due in part to the restrictions against duplication of benefits outlined in this Action Plan. An activity underway prior to the Presidential disaster declaration will not qualify unless the disaster directly impacted said project.
- iv. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG-DR funds that may be contributed to a USACE project is \$250,000 or less.
- v. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for “repair, replacement, or restoration” for damage to any personal, residential, or commercial property if that person at any time has received federal flood disaster assistance that was conditioned on the person first having

obtained flood insurance under applicable federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

**7. National Objectives**

Low- and Moderate-Income (LMI) and urgent need.

**8. Project Selection**

The GLO will hold a call for projects across all grants participating in the program, with each entity permitted to submit a maximum of three eligible projects. The GLO will select which funding source will be utilized to fund the project.

The GLO will then rank projects using the criteria defined in the Selection Criteria Section below. This ranking will be used to inform the project selection in addition to a review of program eligibility and grant conditions. Approved submissions will be relatively prioritized during the contracting process based on the expiration date of the grant being utilized.

**9. Eligibility Criteria**

The financial and management capacity of each entity and feasibility for the submitted project to be completed within the two-year time frame will be evaluated by the GLO for each submission. Additionally, each project must:

- i. Include one activity, one service area, and address one national objective;
- ii. Address unmet needs from applicable disasters and tie-back to the disaster event; and
- iii. Meet a HUD National Objective.

**10. Selection Criteria**

<b>Criteria</b>	<b>Maximum Points</b>
HUD MID	10 Points Possible
<i>Project is in a HUD MID area</i>	<i>10 Points</i>
<i>Project is in a State MID area</i>	<i>0 Points</i>
LMI National Objective	20 Points Possible
<i>Project meets the LMI national objective</i>	<i>20 Points</i>
<i>Project does not meet the LMI national objective</i>	<i>0 Points</i>

<b>Criteria</b>	<b>Maximum Points</b>
Number of CDBG-DR Eligible Presidential Declarations from 2008 to 2019	20 Points Possible
<i>10-12</i>	<i>20 Points</i>
<i>7-9</i>	<i>15 Points</i>
<i>4-6</i>	<i>10 Points</i>
<i>1-3</i>	<i>5 Points</i>
Leverage	5 Points Possible
<i>Entity has pledged to provide Non-CDBG Leverage (a minimum value of 10% of CDBG-DR funds requested)</i>	<i>5 Points</i>
<i>Entity has not pledged to provide Non-CDBG Leverage (a minimum value of 10% of CDBG-DR funds requested)</i>	<i>0 Points</i>
SoVI	15 Points Possible
<i>High</i>	<i>15 Points</i>
<i>Medium High</i>	<i>12 Points</i>
<i>Medium</i>	<i>9 Points</i>
<i>Medium Low</i>	<i>6 Points</i>
<i>Low</i>	<i>3 Points</i>
Composite Disaster Index	20 Points Possible
<i>Top 10%</i>	<i>20 Points</i>
<i>Top 25%</i>	<i>15 Points</i>
<i>Top 75%</i>	<i>10 Points</i>
<i>Bottom 25%</i>	<i>5 Points</i>
<i>Bottom 10%</i>	<i>0 Points</i>
Is the Applicant a Public Housing Authority?	10 Points Possible
<i>Applicant is a Public Housing Authority</i>	<i>10 Points</i>
<i>Applicant is not a Public Housing Authority</i>	<i>0 Points</i>
Tie-Breaker: Higher Poverty Rate	
*More details on scoring criteria will be available in the submission guidelines	

## **11. AFFH Review**

All proposed projects will undergo AFFH review by the applicant before GLO approval. Such review will include assessments of (1) a proposed project’s area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination. Submissions 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.

## **12. Timeline**

The proposed program start date is immediately after HUD’s approval of this Action Plan Amendment. The proposed end date is two years from the start of the program.

#### **F. Location**

All CDBG-DR funded activities under this Action Plan will occur within the disaster-declared counties of FEMA DR-4266, DR-4269, and DR-4272.

#### **G. Mitigation Measures**

The GLO will encourage subrecipients to incorporate preparedness and mitigation measures into rebuilding activities; this helps to ensure that post-recovery communities are safer and stronger than prior to the disaster. Incorporation of these measures also reduces costs in recovering from future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief, long-term recovery, restoration of infrastructure, replacing affected public school, housing, or economic revitalization that responds to declared disaster FEMA DR-4266, DR-4269, and DR-4272.

#### **H. Use of Urgent Need**

Each subrecipient receiving 2016 Floods CDBG-DR funds will document how all activities or projects funded under the urgent need national objective respond to a disaster-related impact identified by the subrecipients. The CDBG certification requirements for documentation of urgent need, located at 24 CFR 570.208(c) and 24 CFR 570.483(d), are waived for the grants under this notice until 24 months after HUD first obligates funds to the grantee.

It is anticipated that the use of the urgent need national objective will be limited. At least 70 percent of the entire CDBG-DR grant award must be used for activities that benefit low- and moderate-income persons.

#### **I. Citizen Participation**

The citizen participation plan for the 2016 Floods allocation as required by the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, will provide a reasonable opportunity of at least fourteen (14) days for citizen comment and ongoing citizen access to information about the use of grant funds.

- Before the GLO adopts the Action Plan for this grant or any substantial amendment to this grant, the GLO will publish the proposed plan or amendment on TexasRebuilds.org — the official website for the GLO’s Community Development and Revitalization program which administers CDBG-

DR grant funds for the state.

- The GLO and/or subrecipients will notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations.
- The GLO will ensure that all citizens have equal access to information about the programs, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP). A Spanish version of the action plan will be available. The GLO consulted the *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, published on January 22, 2007, in the Federal Register (72 FR 2732) in order to comply with citizen participation requirements.
- Upon subsequent publication of the Action Plan or substantial amendments, the GLO will provide a reasonable opportunity of at least fourteen (14) days and have a method for receiving comments.
- The GLO will take comments via USPS mail, fax or email:

Texas General Land Office  
Community Development and Revitalization  
P.O. Box 12873  
Austin, TX 78711-2873  
Fax: 512-475-5150  
Email: [cdr@recovery.texas.gov](mailto:cdr@recovery.texas.gov)

## **1. Public Website**

The GLO will make the following items available on its website: (1) the Action Plan (including all amendments); each Quarterly Performance Report (QPR) as created using the Disaster Recovery Grant Reporting System (DRGR) system; (2) procurement, policies and procedures; (3) executed CDBG-DR contracts; and (4) status of services or goods currently being procured by the GLO (e.g., phase of the procurement, requirements for proposals, etc.).

## **2. Consultation**

The GLO consulted with the five HUD identified “most impacted” area counties and conducted outreach for the other 71 impacted counties. The GLO consultation and outreach included the following:

- 2016: Created a website page for all information related to 2016 Storms and Floods. The web page is accessible from <http://recovery.texas.gov/>.
- April 2016: The GLO sent a letter to all eligible cities, counties, and councils of government located in the disaster-declared counties. This included Texas state representatives, Texas state senators, and congressional representatives.
- April 2016: Created a Recovery Needs survey for all impacted entities. The GLO has received 54 completed surveys.
- January 2017: The GLO presented to the Texas Association of Regional Councils regarding the allocation.
- January/March 2017: The GLO consulted with the HUD-identified “most impacted” counties.
- February 2017: The GLO presented to the Central Texas Voluntary Organizations Active in Disaster regarding the allocation.

## **3. Non-Substantial Amendment**

The GLO will notify HUD when it makes any plan amendment that is not substantial. HUD will be notified at least five business days before the amendment becomes effective. HUD will acknowledge receipt of the notification of non-substantial amendments via email within five (5) business days.

## **4. Consideration of Public Comments**

The GLO will consider all comments, received orally or in writing, on the Action Plan or any substantial amendment. A summary of these comments or views located and the GLO's response to each located in Appendix C must be submitted to HUD with the Action Plan or substantial amendment.



## **5. Citizen Complaints**

The GLO will provide a timely written response to every citizen complaint. The response will be provided within fifteen (15) working days of the receipt of the complaint, if practicable.

## **6. Waivers**

The Appropriations Act authorizes the Secretary of HUD to waive, or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary, or use by the recipient, of these funds and guarantees, except for requirements related to fair housing, nondiscrimination, labor standards, and the environment (including requirements concerning lead-based paint), upon: (1) A request by the grantee explaining why such a waiver is required to facilitate the use of such funds or guarantees; and (2) a finding by the Secretary that such a waiver would not be inconsistent with the overall purpose of the Housing and Community Development (HCD) Act. Regulatory waiver authority is also provided by 24 CFR 5.110, 91.600, and 570.5. At this time, the GLO is not requesting any additional waivers other than those already granted in Federal Registers associated with the funds under this Action Plan.

## **J. Performance and Expenditure Schedule**

The GLO has developed a performance and expenditure schedule that includes projected performance of both expenditures and outcome measures for project, planning, and administration activities shown in the graph below:

## 2016 Floods APA8 - Projection of CDBG-DR Expenditures

Actual expenditures through 2024 2<sup>nd</sup> quarter and projected expenditures through the end of the grant term.

Program	Allocation	2017				2018			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	\$ 102,699,471				\$ -	\$ -	\$ -	\$ -	\$ 296,386
Non-Housing	\$ 119,361,279				\$ -	\$ -	\$ -	\$ 52,573	\$ 334,304
Planning & Admin	\$ 16,834,250				\$ -	\$ -	\$ -	\$ 572,710	\$ 109,817
<b>Grand Total</b>	<b>\$ 238,895,000</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 625,283</b>	<b>\$ 740,507</b>

Program	Allocation	2019				2020			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	\$ 102,699,471	\$ -	\$ 469,643	\$ 1,408,494	\$ 2,762,136	\$ 3,762,625	\$ 2,173,106	\$ 4,819,592	\$ 2,496,341
Non-Housing	\$ 119,361,279	\$ 380,735	\$ 317,204	\$ 170,091	\$ 4,744,050	\$ 7,376,429	\$ 4,097,468	\$ 8,596,945	\$ 4,224,863
Planning & Admin	\$ 16,834,250	\$ 479,193	\$ 351,996	\$ 1,151,128	\$ 610,376	\$ (495,650)	\$ 277,487	\$ 116,741	\$ 667,994
<b>Grand Total</b>	<b>\$ 238,895,000</b>	<b>\$ 859,928</b>	<b>\$ 1,138,842</b>	<b>\$ 2,729,713</b>	<b>\$ 8,116,563</b>	<b>\$ 10,643,404</b>	<b>\$ 6,548,062</b>	<b>\$ 13,533,278</b>	<b>\$ 7,389,198</b>

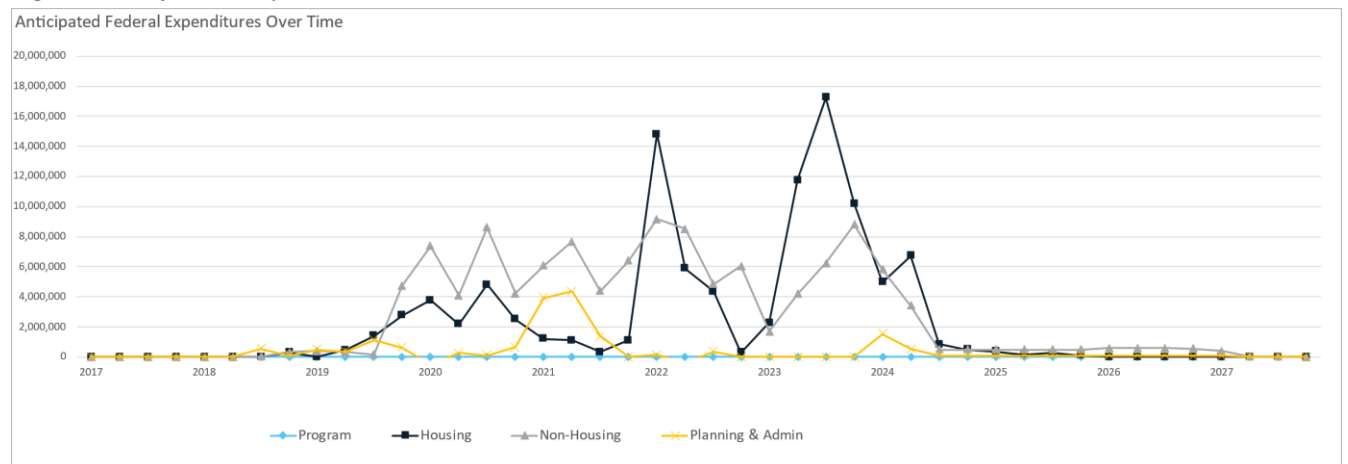
Program	Allocation	2021				2022			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	\$ 102,699,471	\$ 1,214,740	\$ 1,096,331	\$ 338,496	\$ 1,118,033	\$ 14,793,840	\$ 5,896,050	\$ 4,358,263	\$ 308,885
Non-Housing	\$ 119,361,279	\$ 6,082,468	\$ 7,650,298	\$ 4,371,271	\$ 6,409,297	\$ 9,147,335	\$ 8,505,917	\$ 4,839,072	\$ 6,027,951
Planning & Admin	\$ 16,834,250	\$ 3,919,081	\$ 4,344,443	\$ 1,357,476	\$ 2,692	\$ 126,928	\$ (381,440)	\$ 377,254	\$ 5,539
<b>Grand Total</b>	<b>\$ 238,895,000</b>	<b>\$ 11,216,289</b>	<b>\$ 13,091,072</b>	<b>\$ 6,067,242</b>	<b>\$ 7,530,022</b>	<b>\$ 24,068,103</b>	<b>\$ 14,020,527</b>	<b>\$ 9,574,588</b>	<b>\$ 6,342,374</b>

Program	Allocation	2023				2024			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	\$ 102,699,471	\$ 2,265,972	\$ 11,760,927	\$ 17,248,923	\$ 10,184,532	\$ 4,963,490	\$ 6,718,256	\$ 850,000	\$ 500,000
Non-Housing	\$ 119,361,279	\$ 1,709,125	\$ 4,200,949	\$ 6,242,757	\$ 8,808,274	\$ 5,816,159	\$ 3,426,858	\$ 500,000	\$ 500,000
Planning & Admin	\$ 16,834,250	\$ 4,622	\$ 1,562	\$ 6,176	\$ 20,177	\$ 1,532,282	\$ 514,606	\$ 100,000	\$ 100,000
<b>Grand Total</b>	<b>\$ 238,895,000</b>	<b>\$ 3,979,719</b>	<b>\$ 15,963,439</b>	<b>\$ 23,497,857</b>	<b>\$ 19,012,984</b>	<b>\$ 12,311,931</b>	<b>\$ 10,659,721</b>	<b>\$ 1,450,000</b>	<b>\$ 1,100,000</b>

Program	Allocation	2025				2026			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	\$ 102,699,471	\$ 354,408	\$ 175,000	\$ 250,000	\$ 115,000	\$ -	\$ -	\$ -	\$ -
Non-Housing	\$ 119,361,279	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 550,000
Planning & Admin	\$ 16,834,250	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 75,000
<b>Grand Total</b>	<b>\$ 238,895,000</b>	<b>\$ 954,408</b>	<b>\$ 775,000</b>	<b>\$ 850,000</b>	<b>\$ 715,000</b>	<b>\$ 700,000</b>	<b>\$ 700,000</b>	<b>\$ 700,000</b>	<b>\$ 625,000</b>

Program	Allocation	2027			
		Q1	Q2	Q3	Q4
Housing	\$ 118,387,969	\$ -	\$ -	\$ -	\$ -
Non-Housing	\$ 132,414,110	\$ 400,000	\$ 50,000	\$ 28,885	\$ -
Planning & Admin	\$ 16,834,250	\$ 75,000	\$ 50,000	\$ 25,000	\$ 11,061
<b>Grand Total</b>	<b>\$ 267,636,330</b>	<b>\$ 475,000</b>	<b>\$ 100,000</b>	<b>\$ 53,885</b>	<b>\$ 11,061</b>

Figure 6: Projected Expenditures Timeline



## 2016 Floods APA8 - Projection of CDBG-DR Accomplishments

Actual accomplishments through 2024 2<sup>nd</sup> quarter and projected accomplishments through the end of the grant term.

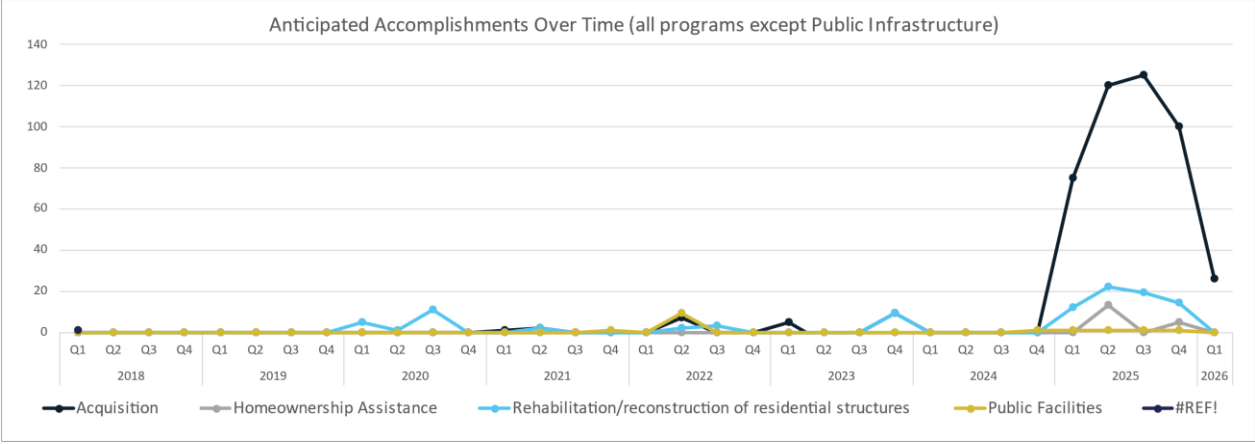
Program Activity Types	Outcomes	2018				2019			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition	465	-	-	-	-	-	-	-	-
Homeownership Assistance	18	-	-	-	-	-	-	-	-
Affordable Rental Housing	106	-	-	-	-	-	-	-	-
Clearance and Demolition	10	-	-	-	-	-	-	-	-
Rehabilitation/reconstruction of residential structures	100	-	-	-	-	-	-	-	-
Public Facilities	15	-	-	-	-	-	-	-	-
Public Infrastructure	1,053,112	-	-	-	-	-	26,500	-	-
Relocation Payments & Housing Incentives	319	-	-	-	-	-	-	-	-
<b>Grand Total</b>	<b>1,054,145</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>26,500</b>	<b>-</b>	<b>-</b>

Program Activity Types	Outcomes	2020				2021			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition	465	-	-	-	-	1	2	-	-
Homeownership Assistance	18	-	-	-	-	-	-	-	-
Affordable Rental Housing	106	-	-	-	-	-	-	-	-
Clearance and Demolition	10	-	-	-	-	-	-	-	-
Rehabilitation/reconstruction of residential structures	100	5	1	11	-	-	2	-	-
Public Facilities	15	-	-	-	-	-	-	-	1
Public Infrastructure	1,053,112	-	-	1	1	-	28,568	107,915	2
Relocation Payments & Housing Incentives	319	-	-	-	-	-	-	-	-
<b>Grand Total</b>	<b>1,054,145</b>	<b>5</b>	<b>1</b>	<b>12</b>	<b>1</b>	<b>1</b>	<b>28,572</b>	<b>107,915</b>	<b>3</b>

Program Activity Types	Outcomes	2022				2023			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition	465	-	7	-	-	5	(5)	-	9
Homeownership Assistance	18	-	-	-	-	-	-	-	-
Affordable Rental Housing	106	-	-	-	-	-	-	-	92
Clearance and Demolition	10	-	-	-	1	-	-	-	-
Rehabilitation/reconstruction of residential structures	100	-	2	3	-	-	-	-	9
Public Facilities	15	-	9	-	-	-	-	-	-
Public Infrastructure	1,053,112	1	-	-	-	-	-	-	-
Relocation Payments & Housing Incentives	319	-	-	-	-	-	-	-	13
<b>Grand Total</b>	<b>1,054,145</b>	<b>1</b>	<b>18</b>	<b>3</b>	<b>1</b>	<b>5</b>	<b>(5)</b>	<b>-</b>	<b>123</b>

Program Activity Types	Outcomes	2024				2025			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition	465	-	-	-	-	75	120	125	100
Homeownership Assistance	18	-	-	-	-	-	13	-	5
Affordable Rental Housing	106	-	-	-	-	9	-	4	1
Clearance and Demolition	10	-	-	-	-	3	3	2	1
Rehabilitation/reconstruction of residential structures	100	-	-	-	-	12	22	19	14
Public Facilities	15	-	-	-	1	1	1	1	1
Public Infrastructure	1,053,112	-	-	-	-	250,000	52,000	325,000	225,000
Relocation Payments & Housing Incentives	319	36	4	1	4	15	96	111	36
<b>Grand Total</b>	<b>1,054,145</b>	<b>36</b>	<b>4</b>	<b>1</b>	<b>5</b>	<b>250,115</b>	<b>52,255</b>	<b>325,262</b>	<b>225,158</b>

Program Activity Types	Outcomes	2026				2027			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Acquisition	465	26	-	-	-	-	-	-	-
Homeownership Assistance	18	-	-	-	-	-	-	-	-
Affordable Rental Housing	106	-	-	-	-	-	-	-	-
Clearance and Demolition	10	-	-	-	-	-	-	-	-
Rehabilitation/reconstruction of residential structures	100	-	-	-	-	-	-	-	-
Public Facilities	15	-	-	-	-	-	-	-	-
Public Infrastructure	1,053,112	38,124	-	-	-	-	-	-	-
Relocation Payments & Housing Incentives	319	3	-	-	-	-	-	-	-
<b>Grand Total</b>	<b>1,054,145</b>	<b>38,153</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>



## VI. Appendix A – Eligible Counties

County	Most Impacted	DR-4266	DR-4269	DR-4272
Anderson	N	N	Y	N
Angelina	N	Y	N	N
Austin	N	N	Y	Y
Bandera	N	N	N	Y
Bastrop	N	N	Y	Y
Bosque	N	N	Y	Y
Brazoria	Y	N	N	Y
Brazos	N	N	N	Y
Brown	N	N	N	Y
Burleson	N	N	N	Y
Caldwell	N	N	N	Y
Callahan	N	N	Y	Y
Cass	N	Y	Y	N
Cherokee	N	N	Y	N
Coleman	N	N	N	Y
Colorado	N	N	Y	N
Comanche	N	N	N	Y
Coryell	N	N	Y	N
Eastland	N	N	N	Y
Erath	N	Y	N	Y
Falls	N	N	N	Y
Fayette	N	N	Y	Y
Fisher	N	N	N	Y
Fort Bend	Y	N	Y	Y
Gregg	N	Y	N	N
Grimes	N	N	Y	Y
Hall	N	N	N	Y
Hardin	N	N	N	Y
Harris	Y	N	Y	Y
Harrison	N	Y	Y	N
Henderson	N	Y	N	N
Hidalgo	N	N	N	Y
Hood	N	Y	N	Y
Houston	N	N	N	Y

County	Most Impacted	DR-4266	DR-4269	DR-4272
Jasper	N	Y	N	Y
Jones	N	N	Y	N
Kleberg	N	N	N	Y
Lamar	N	Y	N	N
Lee	N	N	N	Y
Leon	N	N	N	Y
Liberty	N	N	Y	Y
Limestone	N	Y	N	N
Madison	N	Y	N	Y
Marion	N	Y	N	N
Milam	N	N	Y	N
Montgomery	Y	N	Y	Y
Navarro	N	N	N	Y
Newton	Y	Y	N	N
Orange	N	Y	N	N
Palo Pinto	N	N	N	Y
Parker	N	Y	Y	Y
Polk	N	N	N	Y
Red River	N	Y	N	N
Sabine	N	Y	N	N
San Augustine	N	Y	N	N
San Jacinto	N	N	Y	Y
Shelby	N	Y	N	N
Smith	N	N	Y	N
Somervell	N	N	N	Y
Stephens	N	N	N	Y
Throckmorton	N	N	N	Y
Travis	N	N	N	Y
Trinity	N	N	N	Y
Tyler	N	Y	N	Y
Upshur	N	N	Y	N
Van Zandt	N	N	Y	N
Walker	N	Y	N	Y
Waller	N	N	Y	Y
Washington	N	N	Y	Y
Wharton	N	N	Y	N
Wood	N	N	Y	N

## VII. Appendix B – Certifications

24 CFR 91.325 is waived. Each State receiving a direct allocation under this notice must make the following certifications with its Action Plan:

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for Disaster Recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking to fund, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its action plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each UGLG receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. Each state receiving a direct award under this notice certifies that it has consulted with affected UGLGs in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the state in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the state.
- h. The grantee certifies that it is complying with each of the following criteria:
  1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2016 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.) but prior to September 29, 2016.

2. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
  3. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.
  4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
    - (a) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
    - (b) For purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. The grantee certifies that the grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
  - j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, states receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
    1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
    2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
  - k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, states receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
    1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and



2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- 
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice and requirements of the Appropriations Act applicable to funds allocated by this notice, and certifies to the accuracy of its certification documentation referenced at A.1.a. under section VI and its risk analysis document referenced at A.1.b. under section VI.
  - m. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
  - n. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
  - o. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
  - p. The grantee certifies that it will comply with applicable laws.

# VIII. Appendix C – Public Comment

## The State of Texas Plan for Disaster Recovery – Amendment No. 8

The State of Texas Plan for Disaster Recovery – Amendment No. 8 was released on September 3, 2024. The public comment period for the document ran to September 18, 2024. GLO-CDR distributed a statewide press release announcing the availability of the amendment on recovery.texas.gov and glo.texas.gov websites. Additionally, GLO-CDR sent out an email across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

Forty-three comments regarding the DRRP in general were received. Three comments exclusively relating to Amendment 8 of the 2016 action plan were received. In response to the comments, permanently affixed emergency communications equipment was added as an eligible activity for the DRRP and the maximum number of DRRP submissions was increased from two to three.

### List of Those that Submitted Comment:

Last Name	First Name	Individual, County, City, or Organization
Armstrong	DeWayne	City of Pineland
Thomas	David	Lufkin Police Department
Weems	Scott	City of Nacogdoches
Sprayberry	Sherry	Polk County Sheriff's Office
Stutts	Angela	City of Onalaska
Smith	Clayton	Crockett Police Department
Mohler	Josh	City of Livingston Fire Department
Frizzell	Jason	Crockett Fire Department
Blalock	Thomas	Zavalla Volunteer Fire Department
Edwards	Troy	Fuller Springs Volunteer Fire Department
Cochran	Dennis	Central Volunteer Fire Department
Wolfe	Mike	Huntington VFD
Lovell	Brandan	Huntington Police Department

Last Name	First Name	Individual, County, City, or Organization
Williams	Andrew	Center Police Department
King	Ricky	Center Police Department
Albers	Jim	Center Police Department
Monzingo	Tim	Nacogdoches County Sheriff's Office
McMulley	Michael	Woodville Police Department
Claude	Mike	DETCOG
Eldridge	Emmitt	San Jacinto County OEM
Moehlmann	Chris	South Polk County Volunteer Fire Department
Nehring	Chad	City of Center
Garcia	Angela	American Conservation Foundation, Inc.
Austin	Carolina	Natural Resources Solutions, LC
Sloan	Maddie	Texas Appleseed
Beaty	Sidney	Texas Housers

The following is a summary of the comments received as well as the response.

**DRRP General Comments**

**Comment Received:** All action plan amendments should include the purchase and installation of public safety radio equipment and dispatch centers as an eligible use of DRRP funds. Although HUD does not allow the use of CDBG funds to purchase handheld public safety radios, the GLO should request a waiver regarding this prohibition. *(Similar comment received 22 times)*

**Response:** Thank you for your comment. Permanently affixed emergency communications equipment has been added as an eligible activity to the DRRP. However, due to the limited expenditure deadline for these funds, there will not be sufficient time to request and receive a waiver from HUD to add handheld public safety radios to the list of eligible activities.

**Comment Received:** DETCOG should be allowed to submit a regional application to address public safety communication needs related to radio equipment purchases and installation.

**Response:** A regional application would be problematic due to the selection criteria and single-project constraints under the DRRP, which is necessary to ensure all program funds are utilized in compliance with expenditure timelines.

**Comment Received: Is the applicable LMI going to be from where individuals and families fell during the hurricanes or is their current LMI level today?**

**Response:** The most recently available LMI data will be used for the DRRP eligibility considerations.

**Comment Received: Please clarify whether counties included under the 2011 Wildfire Presidential Declaration but not under any of the other 2008-2019 declarations be eligible to apply.**

**Response:** The DRRP does not add additional eligible areas to any of the six action plans. If a county received a disaster declaration for the 2011 Wildfires but is not included in any of the disaster areas eligible for the DRRP, it would not be eligible to receive these funds.

**Comment Received: Please clarify whether DRRP-eligible counties included under the 2011 Wildfire presidential declaration receive credit for this declaration under the "Number of CDBGDR Eligible Presidential Declarations from 2008 to 2019" criterion.**

**Response:** The presidential declaration from the 2011 Wildfires would be included in the scoring criteria.

**Comment Received: Please clarify whether Bastrop County, the only "HUD Most Impacted and Distressed" area under the 2011 Wildfire grant (77 FR 22584 4/16/21), will receive 10 points under the HUD MID scoring criterion.**

**Response:** The HUD Most Impacted and Distressed scoring criteria is applicable to each individual action plan. The 2011 Wildfires action plan will not be amended to include a DRRP, meaning that counties that were exclusively HUD MID for the 2011 Wildfires will not receive any points for this scoring criterion.

**Comment Received: Please clarify whether funds contributed from each CDBG-DR grant will only be available to projects that serve MID areas associated with that grant.**

**Response:** The DRRP funds in each of the six individual action plans are available to all entities that are eligible under the respective action plan.

**Comment Received: Please clarify if any level of FEMA assistance eligibility will provide a credit toward the points earned for the "Number of CDBG-DR Eligible Presidential Declarations" criterion.**

**Response:** Only disasters for which Federal Major Disaster Declarations and CDBG-DR Eligible Presidential Declarations issued will be factored into this criterion.

**Comment Received: Developing Affirmatively Furthering Fair Housing (AFFH) reviews after projects are proposed works backwards to develop a fair housing narrative and justify project**

**decisions after the fact. This plan amendment does not foster a use of funds that affirmatively furthers fair housing.** *(Similar comment received two times)*

**Response:** AFFH reviews must be conducted by the applicant as a part of its project selection process and submitted to the GLO during the application phase of the program. The GLO will review applicants' compliance with AFFH requirements for each project submitted for funding consideration. The GLO remains committed to ensuring AFFH efforts are compliant with regulatory requirements.

**Comment Received: The current eligible activities do not allow for single-family home repair. The eligible activities need to be updated to better reflect community needs and wants.**

**Response:** Due to the limited nature of the funds and expenditure timeline, the DRRP is focused on infrastructure improvements and the rehabilitation, reconstruction, and new construction of affordable multifamily projects.

**Comment Received: County-level Social Vulnerability Index (SoVI) does not provide enough detail and does not give an accurate picture of vulnerability in specific communities. Using a county-level measure erases the vulnerability of communities within these counties.**

**Response:** The DRRP will be utilizing the Social Vulnerability Index ("SoVI"), a highly regarded metric that accounts for disproportionate impacts, as a scoring criterion. In order for DRRP scoring to remain consistent across all action plans, the GLO will evaluate SoVI scores at the county and place levels. By utilizing SoVI's synthesis of 29 socioeconomic variables contributing to the reduction in a community's ability to prepare for, respond to, and recover from hazards, the GLO is able to discern a clearer picture of differential vulnerability across impacted areas. SoVI has been used in a variety of disaster-related action plans across the nation and has gained prominence in the disaster recovery and mitigation realm.

**Comment Received: We support the goals GLO has laid out for the DRRP; to provide the opportunity for communities with outstanding unmet need to access de-obligated and unutilized CDBG-DR funds and to expedite the expenditure of those funds.**

**Response:** The GLO appreciates this comment.

**Comment Received: We appreciate the inclusion of scoring criteria like the Social Vulnerability Index (SVI), LMI National Objective, Number of CDBG-DR Eligible Presidential Declarations, and additional points for Public Housing Authorities that will help ensure these funds reach underserved communities with the most remaining unmet disaster recovery needs.**

**Response:** The GLO appreciates this comment.

**Comment Received: The amendment does not include detailed information on the Composite Disaster Index (CDI) and Social Vulnerability Index (SVI) scoring criteria.**

**Response:** Additional details on the CDI and SoVI scoring criteria are provided in the DRRP Mapping Viewer, the DRRP Call for Projects Guide, and layer list description, which are available on the GLO's website.

**Comment Received:** We support GLO's inclusion of a Social Vulnerability Index (SVI) in the scoring criteria and agree that the SVI is a critical component of any distribution of public funding.

**Response:** The GLO appreciates this comment.

**Comment Received:** We note that GLO has not specified which SVI it is using or the geographic level of analysis.

**Response:** The DRRP will be utilizing the SoVI, which originated out of the University of South Carolina and was further developed through a partnership with the University of Central Florida. SoVI is a highly regarded metric that accounts for disproportionate impacts through an equity lens. In order for DRRP scoring to remain consistent across all action plans, SoVI scores will be evaluated at the county and place levels.

**Comment Received:** Peer-reviewed research on social vulnerability confirms there is a need for transparency in the methods used to determine vulnerability, on the selection of an appropriate vulnerability index, and on how to adapt the index when county-scale aggregation downplays areas of actual vulnerability. If a default index is to be used, most governments tend to use the Center for Disease Control's social vulnerability index (SVI) which is based on publicly accessible data, for public policy purposes, not the SoVI from U. South Carolina which is based on proprietary information and is often used for academic research. *(Similar comment received two times)*

**Response:** The SoVI, which originated out of the University of South Carolina and was further developed through a partnership with the University of Central Florida, is a highly regarded metric that accounts for disproportionate impacts. By utilizing SoVI, the GLO can discern a clearer picture of differential vulnerability across areas of impact. SoVI synthesizes 29 socioeconomic variables (see Table 3-8 under section 3.6 of this Amendment) that contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties and other geographies. SoVI has been used in a variety of disaster-related action plans across the nation and has gained prominence in the disaster recovery and mitigation realm. The Centers for Disease Control's SVI, on the other hand, refers to the resilience of communities when confronted by external stresses on human health. These two distinctions are further illustrated when recognizing that SoVI is utilized in FEMA's National Risk Index while SVI is being used in the National Environmental Public Health Tracking Network.

**Comment Received:** We support the use of DRRP funds on flood and drainage improvements and water and wastewater improvements.

**Response:** The GLO appreciates this comment.

**Comment Received:** Although street improvements could further the objectives of CDBG-DR, the Amendment 7 language on street-related eligible activities is overly broad. Street improvements projects should only be funded if they make street infrastructure more resilient to flooding.

**Response:** All projects funded under the DRRP will be required to address unmet needs from the applicable disaster in accordance with eligible activity parameters outlined in each action plan and tie back to the disaster event.

**Comment Received:** For the provision related to affordable multifamily units, we urge GLO to add scoring criteria incentivizing making more than 51% of units affordable to the lowest-income Texans and increasing the number of units accessible to people with disabilities. As a recent report from the State Comptroller indicated, increasing the supply of housing, particularly for low-income Texans, is a crucial step towards solving the housing affordability crisis.

**Response:** All affordable multifamily housing projects funded by the DRRP must comply with applicable Housing Guidelines, available on the GLO's website.

**Comment Received:** We are not confident that the intended use of the money, to address the unmet need of the communities affected directly by the storms, will be awarded in a manner that appropriately addresses storm needs. As community members with experience living through countless disasters, of which Houston is a beneficiary of five out of six of these annual declarations, our unmet need should be the most considered in the actions of the GLO.

**Response:** All projects funded under the DRRP will be required to address unmet needs from the applicable disaster and tie back to the disaster event.

**Comment Received:** We are concerned that there is not enough information given to the public in these amendments to submit an appropriate public comment. *(Similar comment received two times)*

**Response:** The GLO drafts action plans and amendments in accordance with regulatory requirements and published HUD guidance.

**Comment Received:** This amendment does not explicitly state that the funds must be used in direct tieback to the storm, like other Amendments clearly state.

**Response:** As stated in the DRRP eligibility criteria in each action plan amendment, each project must "[a]ddress unmet needs from applicable disasters and tie back to the disaster event".

**Comment Received:** We are extremely concerned with the lack of consideration for Affirmatively Furthering Fair Housing regulations and lack of clarity on how the GLO expect to ensure fair housing and discourage discrimination, in light of the current discriminatory finding

**that is still unsettled against the GLO for a similar competition administered with the CDBG-Mitigation funds.**

**Response:** AFFH reviews must be conducted by the applicant as a part of the process for project selection and submitted to the GLO during the application phase of the project. The GLO will review applicants' compliance with AFFH requirements for each project submitted for funding consideration. The GLO remains committed to ensuring AFFH efforts are compliant with regulatory requirements.

**Comment Received: We implore the GLO to withdraw all six amendments that are attempting to create a DRRP in order to move money away from the original intended beneficiaries. Houston was impacted in five of the six funding allocations. And Houston continues to be devastated by disasters. It is unclear why GLO would be moving funding away from the programs they should be completing as those were the most important unmet needs that this money was intended to address. (Similar comment received two times)**

**Response:** The DRRP is designed to utilize funds that have been unutilized and deobligated from other programs to ensure that all grant funds are expended. Communities will be eligible to apply for DRRP funds under any action plan in which they are identified as HUD and/or State MID areas.

**Comment Received: We are also in disagreement that any money that is reallocated for any purpose be withheld from repairing, reconstructing, or rehabilitating single family homes for homeowners living in their primary residence.**

**Response:** Due to the limited nature of the funds and expenditure timelines, the DRRPs are focused on limited infrastructure and affordable multifamily housing projects.

**Comment Received: The Action Plan Amendments note that "each project will undergo eligibility analysis based on the grant that will be used to fund it," but fails to provide detail on how the DRRP will connect to specific grant priorities and requirements.**

**Response:** The DRRP sections of each action plan amendment describe the requirements for use of the reallocated funds and state that selected projects must address unmet needs from the applicable disaster in accordance with eligible activity parameters outlined in the action plan and tie back to the disaster event.

**Comment Received: The GLO also needs to clearly communicate and explain the decision to move funds to a new program. It is unclear why the Action Plan Amendments note that the State of Texas "consistently has insufficient funding to fully recover from disasters" and yet funding is being reallocated. If programs and subrecipients do not fully utilize allocated funds, why can those funds not be reallocated within the existing Action Plan to address previously established priorities and needs? (Similar comment received two times)**



**Response:** All reallocated funds are either funds that were not utilized in their original program or deobligated from closed contracts. The GLO has created the DRRPs to ensure that all remaining grant funds are expended within HUD established timelines.

**Comment Received:** **If the DRRP is going to be an ongoing program using deobligated or unobligated funds, the GLO must spend more time seeking public input and developing meaningful criteria that reflect the needs of low-income Texans.**

**Response:** All action plan amendments have been posted for the federally required amount of time according to respective Federal Register notices due to the limited expenditure timeline of the funds.

**Comment Received:** **The Action Plan Amendments fail to provide evidence to demonstrate that the listed eligible activities are in line with priorities and needs of vulnerable communities who have faced historic discrimination.**

**Response:** All proposed projects must address unmet needs from applicable disasters and tie back to the disaster event. Each project will undergo Affirmatively Furthering Fair Housing (AFFH) review by the applicants before GLO approval, as outlined in the DRRP requirements in the action plans.

**Comment Received:** **Under the proposed Composite Disaster Index (CDI) selection criteria, will GLO use the 254-county-based CDI percentiles, or will it recalculate the percentiles based upon the number of DRRP-eligible counties? If the latter, we request this information be made available prior to finalizing the action plan amendments so that stakeholders can assess the impact on their ability to compete.**

**Response:** The DRRP selection criteria will utilize the state-wide CDI. Additional information on all data used in this program can be found on the program website when the call for projects begins.

**Comment Received:** **The proposed scoring criteria already have another item that measures compounding impacts of disasters - the count of presidential disaster declarations. If the GLO wants to continue to focus so many points on compounding impact and increased vulnerability, they should rework their criteria to more accurately reflect local risk that is relevant to the funding source. (Similar comment received two times)**

**Response:** The DRRP selection criteria are focused on providing funds to areas that have been most frequently impacted by significant disasters. Utilizing CDI and the count of CDBG-DR eligible presidential disaster declarations in the criteria helps to ensure that reallocation funds are used to assist those who are regularly impacted by disasters.

**Comment Received:** **We understand the desire to leverage existing funds, but we are concerned that the inclusion of points for providing at least 10% of the funds requested in the scoring criteria could disadvantage communities without access to other resources for disaster**

recovery. While the higher number of points for projects that meet the LMI National Objective may be intended to mitigate this effect, we are perhaps more concerned that smaller, less well-resourced, and less affluent communities will not have the capacity to submit project applications in the first place. We urge GLO to conduct affirmative outreach to these communities and offer them technical assistance with grant applications. *(Similar comment received two times)*

**Response:** By including a leverage component in the selection criteria, the DRRP encourages submissions from entities that have the capacity and commitment to utilize funds in line with the expenditure timeline. The GLO will host a webinar to discuss the DRRP and provide written submission guides and FAQs to support communities.

**Comment Received:** We are confused about the inclusion of the CDI in the scoring criteria, particularly since a more relevant measure, “Number of CDBG-DR Eligible Presidential Declarations from 2008 to 2018” is also included.

**Response:** The DRRP selection criteria are focused on providing funds to areas that have been most frequently impacted by significant disasters. Utilizing CDI and the count of CDBG-DR eligible presidential disaster declarations in the criteria helps to ensure that reallocation funds are used to assist those who are regularly impacted by disasters.

**Comment Received:** Counties are ranked by the highest frequency per hazard, including wildfires, hail, and drought, that would not result in unmet needs eligible to be addressed with the CDBG-DR funding covered by the proposed Action Plan Amendments. Because the scores are weighted by the relative impact of each hazard on property loss and human casualties, wildfires, which GLO has specifically excluded from the DRRP, are weighted more heavily than flooding, which caused much of the damage these funds are intended to address.

**Response:** The CDI is designed to give a comprehensive description of the impact of all disasters. All DRRP projects will be required to address unmet needs related to the respective disaster events.

**Comment Received:** Normalizing the distribution twice also means that outliers, counties with the most severe risk for eligible hazards, are pulled towards the middle of the distribution, meaning that their relative risk for eligible hazards looks smaller than it actually is.

**Response:** The CDI is one component of the scoring criteria for the DRRP, worth 20 points.

**Comment Received:** The CDI uses data from the National Flood Insurance Program on properties that have flooded multiple times to calculate flood risk. This means that only houses that are insured and have filed flood insurance claims are counted towards flood risk: homeowners who can't afford flood insurance or live in areas without a community rating are excluded.

**Response:** The CDI methodology utilized in the DRRP selection criteria follows the methodology designed by the Center for Space Research at UT Austin. The CDI is one component of the scoring criteria for the DRRP, worth 20 points.

**Comment Received:** The CDI also does not account for the number of people and amount of property at risk from a given hazard. Ranking counties from 1 to 5 instead of using absolute numbers distorts the magnitude of difference between counties.

**Response:** The CDI is one component of the scoring criteria for the DRRP, worth 20 points. The ranking of eligible counties under each DRRP based on areas of impact allows for a more accurate weighting relative to each disaster event.

**Comment Received:** GLO should use the SVI at the census tract and not county level in order to ensure that CDBG-DR funds address unmet recovery needs in the most affected areas. Determining SVI score at the county level rather than at a lower geographic level means that areas with greater economic inequality will have lower SVI scores, even if there are areas within those counties with very high levels of social vulnerability. This may steer funds away from the hardest-hit areas that are most affected by pre-existing inequities and where recovery funds are still most needed.

**Response:** The GLO intends to use SoVI analyses at county and place levels to allow the DRRP scores to be consistent across action plans.

**Comment Received:** The total number project submissions should be increased from two.

**Response:** Thank you for your comment. The maximum number of project submissions per applicant has been increased to three.

**Comment Received:** The public should have an opportunity to know and comment on which specific requirements of an Action Plan are being superseded. While the public may have some sense of this from the current amendments which detail specific programs from and to which funds are being reallocated, the inclusion of language in the Harvey, 2018 Floods, and 2019 Disasters amendments in specific program sections stating that “any remaining funds within this program will be reallocated to the DRRP” suggests that the public may not have an opportunity to comment on future reallocations to the DRRP.

**Response:** The GLO will follow requirements for posting future substantial action plan amendments for public comment as required for each grant.

**Comment Received:** [I]t is critical that the scoring criteria and eligible activities for the DRRP are developed through deliberate and genuine public engagement and are targeted to the low- and moderate-income Texans that are the intended beneficiaries of these funds.

**Response:** The LMI criterion is 20% of the total points award for the DRRP in order to emphasize it as a National Objective. The GLO will follow requirements for posting future substantial action plan amendments for public comment as required for each grant.

**Comment Received:** We would like to emphasize the importance of ensuring that unexpended funds from disaster recovery efforts are reallocated for use within the broader affected regions, particularly in areas that share the same watershed or ecological systems as those originally impacted. By allowing unexpended funds to be reallocated and utilized in counties outside the original disaster declaration areas, we can address the broader environmental and community recovery needs, ensuring a more resilient restoration of these vital ecosystems.

**Response:** HUD does not allow the GLO to make any additional areas eligible under the DRRPs for any of the six action plans.

#### **2016 Amendment 8 Specific Conditions**

**Comment Received:** The Amendment does not specify which MID counties had unused funds or whether those funds were originally allocated for housing or infrastructure. This information should be included.

**Response:** Thank you for your comment. This information is now included in the “MOD Distribution of Most Impacted” Table in Section I of the relevant Action Plan.

**Comment Received:** As required by the Federal Register notice, Vol. 81, No. 224, Monday, November 21, 2016, the Action Plan allows the GLO “to allocate funds to address unmet economic revitalization and infrastructure needs, but in doing so, the grantee must identify how unmet housing needs will be addressed or how its economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.”

**Response:** Thank you for the comment regarding the Federal Register notice, Vol. 81, No. 224, Monday, November 21, 2016.

**Comment Received:** The 2016 Floods amendment fails to show any breakdown of how much is being reallocated from housing or non-housing activities.

**Response:** The nature and needs of projects proposed and selected under the DRRP will determine the types of, and amounts of reallocated funding attributable to, activities included in the program.

## The State of Texas Plan for Disaster Recovery – Amendment No. 6

The State of Texas Plan for Disaster Recovery – Amendment No. 6 was released on August 13, 2021. The public comment period for the document ran to August 26, 2021. GLO-CDR distributed a statewide press release announcing the availability of the amendment on [recovery.texas.gov](http://recovery.texas.gov) and [glo.texas.gov](http://glo.texas.gov) websites. Additionally, GLO-CDR sent out an email across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

### List of Those that Submitted Comment:

Last Name	First Name	Individual, County, City, or Organization
McCain	Minnie	Individual
Hood	Rose	Individual

The following is a summary of the comments received as well as the response.

**Comment Received:** I am living in a flood zone now which Newton County knows about; my home has flooded repeatedly in recent multiple years. I've sought recovery assistance and was promised a house but have received none.

**Staff Response:** Thank you for your public comment. The GLO has referred this case to the GLO's Community & Quality Assurance team.

**Comment Received:** This money should be used to build back my elderly mother's house that she was approved for and signed a contract for.

**Staff Response:** Thank you for your public comment. The GLO has referred this case to the GLO's Community & Quality Assurance team.

**The State of Texas Plan for Disaster Recovery – Amendment No. 5**

The State of Texas Plan for Disaster Recovery – Amendment No. 5 was released on July 26, 2019. The public comment period for the document ran to August 8, 2019. GLO-CDR distributed a statewide press release announcing the availability of the amendment on recovery.texas.gov and glo.texas.gov websites. Additionally, GLO-CDR sent out an email to over 1,100 recipients across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

List of Those that Submitted Comment:

<b>NAME</b>	<b>COUNTY</b>
None	None

The following is a summary of the comments received as well as the response.

**Comments: The GLO did not receive any comments on Amendment No. 5**

**The State of Texas Plan for Disaster Recovery – Amendment No. 4**

The State of Texas Plan for Disaster Recovery – Amendment No. 4 was released on May 3, 2019. The public comment period for the document ran to May 19, 2019. GLO-CDR distributed a Statewide press release announcing the availability of the Amendment on the recovery.texas.gov and glo.texas.gov websites. Additionally, GLO-CDR sent out an email to over 1,100 recipients across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

List of Those that Submitted Comment:

NAME	COUNTY
None	None

The following is a summary of the comments received as well as the response.

**Comments: The GLO did not receive any comments on Amendment No. 4**

## The State of Texas Plan for Disaster Recovery – Amendment No. 2

The State of Texas Plan for Disaster Recovery – Amendment No. 2 was released on May 10, 2018. The public comment period for the document ran to May 24, 2018. GLO-CDR distributed a Statewide press release announcing the availability of the Amendment on the TexasRebuilds.org and glo.texas.gov websites. Additionally, GLO-CDR sent out an email to over 1,100 recipients across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

List of Those that Submitted Comment:

NAME	COUNTY
None	None

The following is a summary of the comments received as well as the response.

**Comments: The GLO did not receive any comments on Amendment No. 2**



**The State of Texas Plan for Disaster Recovery – Amendment No. 1**

The State of Texas Plan for Disaster Recovery – Amendment No. 1 was released on October 10, 2017. The public comment period for the document ran to October 27, 2017. GLO-CDR distributed a Statewide press release announcing the availability of the Amendment on the TexasRebuilds.org and glo.texas.gov websites. Additionally, GLO-CDR sent out an email to over 1,100 recipients across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

List of Those that Submitted Comment:

<b>NAME</b>	<b>COUNTY</b>
None	None

The following is a summary of the comments received as well as the response.

**Comments: The GLO did not receive any comments on Amendment No. 1**

## The State of Texas Plan for Disaster Recovery – Initial Action Plan

The State of Texas Plan for Disaster Recovery was released on March 10, 2017. The public comment period for the document ran to March 27, 2017. GLO-CDR distributed a Statewide press release announcing the availability of the Plan on the TexasRebuilds.org website. Additionally, GLO-CDR sent out an email to over 1,100 recipients across the 71 eligible counties targeting local emergency management coordinators, county and local government officials, and other interested parties.

List of Those that Submitted Comment:

NAME	COUNTY
Amy McGalin	Newton County
Andres Garza Jr.	City of Wharton
Caroline Egan	Fort Bend County
Dale Bailey	Newton County
Dana Ashmore	Newton County
Brenda Meadows	Newton County
Gwyneth Teves	City of Wharton
Holly Hardin	Newton County
Hope Hardin	Newton County
Keith Jones	Deweyville ISD
Mary Itz	City of Houston
Monica Badillo	Hidalgo County
Paul Price	Newton County
Tami Haney	Newton County
Tom McCasland	City of Houston
Valde Guerra	Hidalgo County

The following is a summary of the comments received as well as the response.

### **Comment #1: Action Plan Content Edits**

Comments were made that there are typos in the 2016 Action plan. These are located on page 10 as well as on page 20.

**Staff Response #1:** These typos have been fixed and integrated into the final draft of the Action Plan.

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### **Comment #2: Usage Considerations for Grant Funding**

Comments were made indicating how residents feel that funds should be spent in Newton County. These citizens request that funds be provided to the Deweyville Elementary School District, spent on the elderly who are living in temporary housing, and that funds should be spent with proper oversight,

transparency, and on projects related to damages from the 2016 flooding. Newton County citizens also requested that funds be spent on roads that are damaged or that were damaged by flooding.

**Staff Response #2:** All projects must be eligible for CDBG-DR funds and have damages that are tied to the specific flooding disasters. The GLO Community Development and Revitalization (GLO-CDR) program will be required by the U.S. Department of Housing and Urban Development (HUD) to conduct the proper oversight and reporting on how subrecipients are expending funds. GLO-CDR will ensure proper oversight and transparency and will publish Quarterly Progress Reports (QPRs) as required by HUD and will make these available through the [www.TexasRebuilds.org](http://www.TexasRebuilds.org) website.

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**Comment #3: Unmet Needs in Newton County**

Comments were made indicating that there were several unmet needs in the county of Newton. Newton County officials conducted a survey of citizens that had experienced damages because of the flooding.

**Staff Response #3:** GLO-CDR appreciates the efforts made by Newton County to capture the unmet needs of citizens. All efforts will be made by GLO-CDR to encourage CDBG-DR subrecipients to consider homes damaged by the disaster. It is further encouraged that citizens of Newton county maintain communication with their elected representatives as well as frequently visit [www.TexasRebuilds.org](http://www.TexasRebuilds.org) to stay informed on the status of applications and funding.

-

**Comment #4: Request for Modification of Breakdown for Allocation Weighting Factors**

Comments were made requesting that changes be made to the breakdown for Allocation Weighting Factors that were used in the determination of funds that should be received by the Most Impacted counties of Brazoria, Fort Bend, Harris, Montgomery, and Newton counties.

**Staff Response #4:** GLO-CDR worked extensively to ensure that the funding breakdown was the most equitable and fair based on the data that was available. The current scoring system was developed with consultation across the agency and designed to reflect the needs for each Most Impacted county. GLO-CDR appreciates the comments received regarding the allocation breakdown scoring, but will not be able to modify these scores to accommodate the request of the commenters.

-

**Comment #5: Place More Focus on the Housing Portion of the Action Plan**

A comment was made indicating that the action plan should focus more on the housing portion of the plan and that the efforts that result from the action plan should attempt to get citizens back into their homes.

**Staff Response #5:** The Federal Register requires that each grantee considers and addresses its unmet housing recovery needs. Further, the grantee must identify how unmet housing needs will be addressed or how its economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas. In its current form, the action plan does address this.

**Comment #6: Applying for a Portion of the Statewide Flood Management Study Funding**

A comment was made indicating that a subrecipient would like to apply for a portion of a statewide planning study. It was stated additionally that a localized county study would help in the understanding and documentation on how the creation of roads and infrastructure affects flooding in their region. It was further stated that counties will be the best-equipped to perform this type of study.

**Staff Response #6:** The criteria and methods for approach to this Statewide Flood Management Study will be developed further as planning is underway. Considerations at the county level will be addressed in the development of this study.

-

**Comment #7: Comment Regarding a Local Grant Manager**

A comment was made indicating that a grant manager should not be considered in the management of grant funds.

**Staff Response #7:** GLO-CDR has developed a procurement policy and guidance that must be followed by local subrecipients seeking grant managers. This new procurement policy and technical guidance must be followed in the effective execution of grant manager procurement by subrecipients. This effort will ensure the efficient and effective process that subrecipients will engage in when procuring grant management vendors.

-

**Comment #8: Local School for Project Consideration**

A letter was received regarding the consideration of a local school that had experienced significant impact from the 2016 floods.

**Staff Response #8:** All projects will be considered based on the damages from the flooding disasters and the three national objectives of serving low-to-moderate income persons, addressing slum and blight, and addressing an urgent need.

-

**Comment #9: Social Vulnerability Index (SoVI)**

A comment was submitted regarding the details of the social vulnerability index.

**Staff Response #9:** The Social Vulnerability Index (SoVI) 2010-14 measures the social vulnerability of U.S. counties to environmental hazards. The index is a comparative metric that facilitates the examination of the differences in social vulnerability among counties. SoVI is a valuable tool for policy makers and practitioners because it graphically illustrates the geographic variation in social vulnerability. It shows where there is uneven capacity for preparedness and response and where resources might be used most effectively to reduce the pre-existing vulnerability. SoVI also is useful as an indicator in determining the differential recovery from disasters using empirically-based information.

# IX. Appendix D – Public Assistance

## Projected Project Amount

FEMA Public Assistance Projected Amount provided by Texas Division of Emergency Management as of July 17, 2017

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
ANDERSON (COUNTY)	Anderson	N/A	\$581,251.39	N/A	\$581,251.39
PALESTINE	Anderson	N/A	\$483,645.84	N/A	\$483,645.84
PALESTINE INDEPENDENT SCHOOL DISTRICT	Anderson	N/A	\$107,566.25	N/A	\$107,566.25
WESTWOOD SCHOOL DISTRICT	Anderson	N/A	\$298,676.65	N/A	\$298,676.65
ANGELINA (COUNTY)	Angelina	\$545,241.34	N/A	N/A	\$545,241.34
AUSTIN (COUNTY)	Austin	N/A	\$890,470.46	\$281,847.19	\$1,172,317.65
SAN FELIPE	Austin	N/A	\$30,446.93	\$178,200.00	\$208,646.93
SAN FELIPE-FRYDEK VFD	Austin	N/A	\$8,197.50	\$20,090.00	\$28,287.50
SEALY	Austin	N/A	\$127,492.92	\$154,577.32	\$282,070.24
SEALY FIRE DEPT	Austin	N/A	\$8,707.93	N/A	\$8,707.93
WALLIS	Austin	N/A	\$217,027.59	N/A	\$217,027.59
BANDERA	Bandera	N/A	N/A	\$92,230.58	\$92,230.58
BANDERA (COUNTY)	Bandera	N/A	N/A	\$225,209.08	\$225,209.08
BANDERA INDEPENDENT SCHOOL DISTRICT	Bandera	N/A	N/A	\$20,945.79	\$20,945.79
AQUA WATER SUPPLY CORPORATION	Bastrop	N/A	N/A	\$117,196.79	\$117,196.79
BASTROP	Bastrop	N/A	N/A	\$81,718.76	\$81,718.76
BASTROP (COUNTY)	Bastrop	N/A	\$651,958.11	\$1,523,144.01	\$2,175,102.12
BASTROP COUNTY MUNICIPAL	Bastrop	N/A	N/A	\$178,710.34	\$178,710.34

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
UTILITY DISTRICT NUMBER 1					
BASTROP COUNTY WATER CONTROL & IMPROVEMENT DIST 2	Bastrop	N/A	\$48,626.61	\$374,425.42	\$423,052.03
SMITHVILLE	Bastrop	N/A	\$23,263.22	\$37,719.13	\$60,982.35
BOSQUE (COUNTY)	Bosque	N/A	\$56,502.36	\$88,534.89	\$145,037.25
CLIFTON	Bosque	N/A	N/A	\$443,982.45	\$443,982.45
ANGLETON INDEPENDENT SCHOOL DISTRICT (ISD)	Brazoria	N/A	N/A	N/A	N/A
BRAZORIA	Brazoria	N/A	N/A	\$22,235.77	\$22,235.77
BRAZORIA (COUNTY)	Brazoria	N/A	N/A	\$2,099,473.36	\$2,099,473.36
BRAZORIA COUNTY EMERGENCY SERVICES DISTRICT NO. 3	Brazoria	N/A	N/A	\$18,326.88	\$18,326.88
FREEPORT	Brazoria	N/A	N/A	\$58,967.20	\$58,967.20
HOLIDAY LAKES	Brazoria	N/A	N/A	\$344,075.70	\$344,075.70
JONES CREEK	Brazoria	N/A	N/A	\$102,144.34	\$102,144.34
LAKE JACKSON	Brazoria	N/A	N/A	\$410,847.25	\$410,847.25
RICHWOOD	Brazoria	N/A	N/A	\$42,826.48	\$42,826.48
VELASCO DRAINAGE DISTRICT	Brazoria	N/A	N/A	\$125,744.20	\$125,744.20
WEST COLUMBIA	Brazoria	N/A	N/A	\$133,818.90	\$133,818.90
BRAZOS (COUNTY)	Brazos	N/A	N/A	\$293,504.06	\$293,504.06
BRYAN	Brazos	N/A	N/A	\$378,785.92	\$378,785.92
BROWN (COUNTY)	Brown	N/A	N/A	\$186,261.93	\$186,261.93
BROWNWOOD	Brown	N/A	N/A	\$9,839.35	\$9,839.35

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
BURLESON (COUNTY)	Burleson	N/A	N/A	\$540,466.87	\$540,466.87
SOMERVILLE	Burleson	N/A	N/A	\$161,513.97	\$161,513.97
CALDWELL (COUNTY)	Caldwell	N/A	N/A	\$497,505.58	\$497,505.58
BAIRD	Callahan	N/A	N/A	\$114,819.99	\$114,819.99
CALLAHAN (COUNTY)	Callahan	N/A	N/A	\$2,835,242.91	\$2,835,242.91
CLYDE	Callahan	N/A	N/A	\$155,685.17	\$155,685.17
CROSS PLAINS	Callahan	N/A	N/A	\$61,031.07	\$61,031.07
CASS (COUNTY)	Cass	\$252,869.13	\$126,714.61	N/A	\$379,583.74
LINDEN	Cass	\$392,702.83	N/A	N/A	\$392,702.83
CHEROKEE (COUNTY)	Cherokee	N/A	\$430,408.20	N/A	\$430,408.20
COLEMAN	Coleman	N/A	N/A	\$16,878.12	\$16,878.12
COLEMAN (COUNTY)	Coleman	N/A	N/A	\$1,627,920.07	\$1,627,920.07
COLEMAN COUNTY ELECTRIC	Coleman	N/A	N/A	\$59,085.17	\$59,085.17
NOVICE	Coleman	N/A	N/A	\$32,835.00	\$32,835.00
COLORADO (COUNTY)	Colorado	N/A	\$1,255,576.03	N/A	\$1,255,576.03
COLUMBUS	Colorado	N/A	\$91,375.00	N/A	\$91,375.00
CORYELL (COUNTY)	Coryell	N/A	\$820,009.57	N/A	\$820,009.57
CORYELL CITY WATER SUPPLY DISTRICT	Coryell	N/A	\$20,591.74	N/A	\$20,591.74
CARBON	Eastland	N/A	N/A	\$3,567.48	\$3,567.48
CISCO	Eastland	N/A	N/A	\$9,294,783.87	\$9,294,783.87
EASTLAND (COUNTY)	Eastland	N/A	N/A	\$1,276,123.12	\$1,276,123.12
RANGER	Eastland	N/A	N/A	\$402,109.23	\$402,109.23
DUBLIN	Erath	\$25,447.71	N/A	\$161,020.75	\$186,468.46
ERATH (COUNTY)	Erath	N/A	N/A	\$2,075,419.43	\$2,075,419.43
STEPHENVILLE	Erath	\$60,130.99	N/A	\$317,073.86	\$377,204.85

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
TARLETON STATE UNIVERSITY	Erath	\$1,085,915.40	N/A	\$205,859.38	\$1,291,774.78
FALLS (COUNTY)	Falls	N/A	N/A	\$838,665.96	\$838,665.96
FAYETTE (COUNTY)	Fayette	N/A	\$207,009.28	\$395,429.36	\$602,438.64
LA GRANGE	Fayette	N/A	N/A	\$415,803.00	\$415,803.00
ROUND TOP CARMINE INDEPENDENT SCHOOL DISTRICT	Fayette	N/A	N/A	\$57,633.09	\$57,633.09
FISHER (COUNTY)	Fisher	N/A	N/A	\$405,916.20	\$405,916.20
LIGHTHOUSE ELECTRIC CO-OP INC	Floyd	N/A	N/A	\$142,599.64	\$142,599.64
FIRST COLONY LEVEE IMPROVEMENT DISTRICT	Fort Bend	N/A	N/A	\$4,861.08	\$4,861.08
FIRST COLONY LEVEE IMPROVEMENT DISTRICT #2	Fort Bend	N/A	N/A	\$61,844.10	\$61,844.10
FORT BEND (COUNTY)	Fort Bend	N/A	\$1,798,343.14	\$1,071,443.00	\$2,869,786.14
FORT BEND COUNTY FRESH WATER SUPPLY DISTRICT NO. 2	Fort Bend	N/A	N/A	\$133,248.92	\$133,248.92
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #10	Fort Bend	N/A	\$35,789.00	\$43,310.00	\$79,099.00
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #11	Fort Bend	N/A	\$6,040.00	\$24,566.25	\$30,606.25
FORT BEND COUNTY LEVEE	Fort Bend	N/A	N/A	\$6,632.88	\$6,632.88



APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
IMPROVEMENT DISTRICT #14					
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #15	Fort Bend	N/A	\$29,141.47	\$44,297.14	\$73,438.61
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #17	Fort Bend	N/A	\$3,653.75	\$10,931.25	\$14,585.00
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #19	Fort Bend	N/A	\$10,287.63	\$17,494.79	\$27,782.42
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #2	Fort Bend	N/A	N/A	\$43,372.30	\$43,372.30
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #20	Fort Bend	N/A	N/A	\$34,562.14	\$34,562.14
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #6	Fort Bend	N/A	N/A	\$5,554.03	\$5,554.03
FORT BEND COUNTY LEVEE IMPROVEMENT DISTRICT #7	Fort Bend	N/A	N/A	\$34,938.19	\$34,938.19
FORT BEND COUNTY MUNICIPAL UTILITY DISTRICT #121	Fort Bend	N/A	N/A	\$3,146.75	\$3,146.75
FORT BEND COUNTY MUNICIPAL	Fort Bend	N/A	N/A	\$14,583.33	\$14,583.33

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
UTILITY DISTRICT #46					
MISSOURI CITY	Fort Bend	N/A	N/A	\$135,286.51	\$135,286.51
PECAN GROVE MUNICIPAL UTILITY DISTRICT	Fort Bend	N/A	N/A	\$725,586.73	\$725,586.73
RICHMOND	Fort Bend	N/A	N/A	\$182,495.96	\$182,495.96
ROSENBERG	Fort Bend	N/A	N/A	\$565,103.12	\$565,103.12
SIENNA PLANTATION LEVEE IMPROVEMENT DISTRICT	Fort Bend	N/A	\$95,450.12	\$1,882,710.98	\$1,978,161.10
SIMONTON	Fort Bend	N/A	\$62,710.18	\$244,549.41	\$307,259.59
SUGAR LAND	Fort Bend	N/A	N/A	\$361,825.72	\$361,825.72
CLARKSVILLE CITY	Gregg	\$8,019.86	N/A	N/A	\$8,019.86
GREGG (COUNTY)	Gregg	\$395,208.85	N/A	N/A	\$395,208.85
KILGORE	Gregg	\$544,487.70	N/A	N/A	\$544,487.70
LONGVIEW	Gregg	\$582,568.78	N/A	N/A	\$582,568.78
GRIMES (COUNTY)	Grimes	N/A	\$205,226.60	\$281,320.09	\$486,546.69
NAVASOTA	Grimes	N/A	N/A	\$109,302.90	\$109,302.90
ESTELLINE	Hall	N/A	N/A	\$148,550.48	\$148,550.48
HALL (COUNTY)	Hall	N/A	N/A	\$560,229.23	\$560,229.23
LAKEVIEW	Hall	N/A	N/A	\$13,361.10	\$13,361.10
MEMPHIS	Hall	N/A	N/A	\$280,708.92	\$280,708.92
HARDIN (COUNTY)	Hardin	N/A	N/A	\$79,816.74	\$79,816.74
ALDINE INDEPENDENT SCHOOL DIST	Harris	N/A	\$3,123.31	N/A	\$3,123.31
CY-FAIR VOLUNTEER FIRE DEPT	Harris	N/A	\$116,537.58	N/A	\$116,537.58
CYPRESS FAIRBANKS INDEPENDENT SCHOOL DIST.	Harris	N/A	\$1,971,755.47	N/A	\$1,971,755.47

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
CYPRESS FOREST PUBLIC UTILITY DISTRICT	Harris	N/A	\$407,432.22	N/A	\$407,432.22
GRANTWOODS WATER SUPPLY CORP	Harris	N/A	\$115,011.21	N/A	\$115,011.21
HARRIS (COUNTY)	Harris	N/A	\$6,292,885.62	N/A	\$6,292,885.62
HARRIS COUNTY EMERGENCY CORPS	Harris	N/A	\$15,261.85	N/A	\$15,261.85
HARRIS COUNTY EMERGENCY SERVICES DISTRICT #13	Harris	N/A	\$47,410.92	N/A	\$47,410.92
HARRIS COUNTY ESD #24	Harris	N/A	\$21,418.89	N/A	\$21,418.89
HARRIS COUNTY FLOOD CONTROL	Harris	N/A	\$88,009.59	N/A	\$88,009.59
HARRIS COUNTY MUNICIPAL UTILITY DISTRICT # 26	Harris	N/A	\$71,000.00	N/A	\$71,000.00
HARRIS COUNTY MUNICIPAL UTILITY DISTRICT #102	Harris	N/A	\$333,379.44	N/A	\$333,379.44
HOUSTON	Harris	N/A	\$3,257,310.19	N/A	\$3,257,310.19
HOUSTON INDEPENDENT SCHOOL DISTRICT	Harris	N/A	\$366,036.33	N/A	\$366,036.33
JERSEY VILLAGE	Harris	N/A	\$207,247.46	N/A	\$207,247.46
KATY	Harris	N/A	\$292,722.31	N/A	\$292,722.31
KLEIN INDEPENDENT SCHOOL DISTRICT	Harris	N/A	\$326,446.53	N/A	\$326,446.53

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
METROPOLITAN TRANSIT AUTH. OF HARRIS CO	Harris	N/A	\$284,392.75	N/A	\$284,392.75
PONDEROSA VOLUNTEER FIRE ASSOC., INC. (HQ)	Harris	N/A	\$23,102.41	N/A	\$23,102.41
TIMBER LANE UTILITY DISTRICT	Harris	N/A	\$121,392.60	N/A	\$121,392.60
HARRISON (COUNTY)	Harrison	\$559,026.60	\$338,645.42	N/A	\$897,672.02
UNCERTAIN	Harrison	\$4,525.00	N/A	N/A	\$4,525.00
HENDERSON (COUNTY)	Henderson	\$145,349.49	N/A	N/A	\$145,349.49
POYNOR	Henderson	\$25,354.93	N/A	N/A	\$25,354.93
HIDALGO	Hidalgo	N/A	N/A	N/A	N/A
HIDALGO (COUNTY)	Hidalgo	N/A	N/A	\$60,637.43	\$60,637.43
HIDALGO INDEPENDENT SCHL DIST	Hidalgo	N/A	N/A	\$28,232.69	\$28,232.69
LA JOYA INDEPENDENT SCHL DIST	Hidalgo	N/A	N/A	\$29,699.33	\$29,699.33
MCALLEN	Hidalgo	N/A	N/A	\$4,584.40	\$4,584.40
MISSION	Hidalgo	N/A	N/A	\$38,753.53	\$38,753.53
PALMVIEW	Hidalgo	N/A	N/A	\$8,675.84	\$8,675.84
PHARR	Hidalgo	N/A	N/A	\$3,898.55	\$3,898.55
DECORDOVA	Hood	N/A	N/A	\$85,284.39	\$85,284.39
GRANBURY	Hood	N/A	N/A	\$198,787.96	\$198,787.96
HOOD (COUNTY)	Hood	N/A	N/A	\$47,785.42	\$47,785.42
LIPAN	Hood	N/A	N/A	N/A	N/A
ROLLING HILLS WATER SERVICE, INC.	Hood	N/A	N/A	\$21,096.95	\$21,096.95
CONSOLIDATED WATER SUPPLY CORP	Houston	N/A	N/A	\$83,755.08	\$83,755.08
CROCKETT	Houston	N/A	N/A	\$154,269.39	\$154,269.39

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
HOUSTON (COUNTY)	Houston	N/A	N/A	\$2,056,925.74	\$2,056,925.74
JASPER	Jasper	\$137,540.82	N/A	N/A	\$137,540.82
JASPER (COUNTY)	Jasper	\$400,342.48	N/A	\$620,071.55	\$1,020,414.03
JONES (COUNTY)	Jones	N/A	\$1,681,750.70	N/A	\$1,681,750.70
KINGSVILLE	Kleberg	N/A	N/A	\$699,753.06	\$699,753.06
KINGSVILLE INDEPENDENT SCHOOL DISTRICT	Kleberg	N/A	N/A	\$100,000.00	\$100,000.00
KLEBERG (COUNTY)	Kleberg	N/A	N/A	\$59,757.68	\$59,757.68
RICARDO SCHOOL DISTRICT	Kleberg	N/A	N/A	\$50,000.00	\$50,000.00
CITY OF BLOSSOM	Lamar	\$51,585.48	N/A	N/A	\$51,585.48
LAMAR (COUNTY)	Lamar	\$597,059.75	N/A	N/A	\$597,059.75
GIDDINGS	Lee	N/A	N/A	\$21,776.34	\$21,776.34
LEE (COUNTY)	Lee	N/A	N/A	\$128,369.06	\$128,369.06
LEON (COUNTY)	Leon	N/A	N/A	\$139,918.42	\$139,918.42
DAYTON LAKES	Liberty	N/A	N/A	\$25,635.75	\$25,635.75
LIBERTY	Liberty	N/A	\$1,308,751.58	\$153,868.75	\$1,462,620.33
LIBERTY (COUNTY)	Liberty	N/A	\$57,467.33	\$531,822.27	\$589,289.60
LIBERTY COUNTY WATER CONTROL IMP DISTRICT #5	Liberty	N/A	N/A	\$121,872.99	\$121,872.99
MADISON (COUNTY)	Madison	\$350,818.02	N/A	\$126,481.14	\$477,299.16
MADISONVILLE	Madison	N/A	N/A	\$33,787.95	\$33,787.95
JEFFERSON	Marion	\$48,738.45	N/A	N/A	\$48,738.45
MARION (COUNTY)	Marion	\$147,457.84	N/A	N/A	\$147,457.84
BUCKHOLTS	Milam	N/A	\$30,000.00	N/A	\$30,000.00
MILAM (COUNTY)	Milam	N/A	\$583,286.86	N/A	\$583,286.86
CONROE	Montgomery	N/A	\$192,351.16	\$1,033,492.65	\$1,225,843.81
MAGNOLIA	Montgomery	N/A	\$195,370.65	\$242,707.94	\$438,078.59

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
MAGNOLIA VOLUNTEER FIRE DEPT	Montgomery	N/A	\$19,944.12	\$31,925.06	\$51,869.18
MONTGOMERY	Montgomery	N/A	\$7,449.97	\$1,459,411.88	\$1,466,861.85
MONTGOMERY (COUNTY)	Montgomery	N/A	\$654,291.87	\$1,324,761.89	\$1,979,053.76
MONTGOMERY CO WATER CONTROL & IMPROVEMENT DIST #1	Montgomery	N/A	\$115,529.37	N/A	\$115,529.37
MONTGOMERY COUNTY DRAINAGE DISTRICT #6	Montgomery	N/A	N/A	\$405,029.24	\$405,029.24
MONTGOMERY COUNTY EMERGENCY SERVICE DISTRICT #9	Montgomery	N/A	N/A	\$15,186.33	\$15,186.33
MONTGOMERY COUNTY ESD # 1	Montgomery	N/A	N/A	\$29,799.61	\$29,799.61
MONTGOMERY COUNTY ESD # 4	Montgomery	N/A	\$10,511.41	\$9,216.88	\$19,728.29
MONTGOMERY COUNTY ESD # 6	Montgomery	N/A	\$26,212.42	\$10,477.81	\$36,690.23
MONTGOMERY COUNTY ESD #2	Montgomery	N/A	N/A	\$57,259.01	\$57,259.01
MONTGOMERY COUNTY WCID	Montgomery	N/A	N/A	\$130,582.37	\$130,582.37
OAK RIDGE NORTH	Montgomery	N/A	\$35,385.14	N/A	\$35,385.14
PANORAMA VILLAGE	Montgomery	N/A	N/A	\$96,887.21	\$96,887.21
PATTON VILLAGE	Montgomery	N/A	\$33,796.71	\$813,621.50	\$847,418.21
ROMAN FOREST	Montgomery	N/A	\$1,260,343.41	\$582,342.20	\$1,842,685.61

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
SPRING CREEK UTILITY DISTRICT	Montgomery	N/A	\$321,141.57	N/A	\$321,141.57
STAGECOACH	Montgomery	N/A	N/A	\$99,114.25	\$99,114.25
TEXAS NATIONAL MUNICIPAL UTILITY DISTRICT	Montgomery	N/A	\$46,091.63	\$292,724.97	\$338,816.60
WILLIS	Montgomery	N/A	\$57,428.87	\$6,945.45	\$64,374.32
WOODBROUGH	Montgomery	N/A	\$91,249.41	N/A	\$91,249.41
WOODLOCH	Montgomery	N/A	N/A	\$23,691.00	\$23,691.00
FROST	Navarro	N/A	N/A	\$73,990.55	\$73,990.55
NAVARRO (COUNTY)	Navarro	N/A	N/A	\$230,108.86	\$230,108.86
DEWEYVILLE ISD	Newton	\$14,576,180.45	N/A	N/A	\$14,576,180.45
NEWTON	Newton	\$42,507.08	N/A	N/A	\$42,507.08
NEWTON (COUNTY)	Newton	\$3,219,762.55	N/A	N/A	\$3,219,762.55
NEWTON COUNTY ESD #2	Newton	\$41,098.06	N/A	N/A	\$41,098.06
SOUTH NEWTON WATER SUPPLY CORP	Newton	\$192,440.77	N/A	N/A	\$192,440.77
ORANGE	Orange	\$322,594.24	N/A	N/A	\$322,594.24
ORANGE (COUNTY)	Orange	\$860,255.37	N/A	N/A	\$860,255.37
ORANGE COUNTY EMERGENCY SERVICES DISTRICT #3	Orange	\$6,078.04	N/A	N/A	\$6,078.04
ORANGE COUNTY NAVIGATION & PORT DISTRICT	Orange	\$755,649.30	N/A	N/A	\$755,649.30
WEST ORANGE	Orange	\$9,341.20	N/A	N/A	\$9,341.20
WEST ORANGE-COVE CONSOLIDATED ISD	Orange	\$61,016.33	N/A	N/A	\$61,016.33
GORDON	Palo Pinto	N/A	N/A	\$70,505.35	\$70,505.35
MINGUS	Palo Pinto	N/A	N/A	\$591,376.57	\$591,376.57

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
PALO PINTO (COUNTY)	Palo Pinto	N/A	N/A	\$188,875.40	\$188,875.40
STRAWN	Palo Pinto	N/A	N/A	\$262,138.91	\$262,138.91
ALEDO INDEPENDENT SCHOOL DIST	Parker	\$47,014.00	N/A	N/A	\$47,014.00
PARKER (COUNTY)	Parker	\$6,166.04	N/A	N/A	\$6,166.04
PARKER COUNTY EMERGENCY SERVICE DISTRICT #6	Parker	\$4,091.59	N/A	N/A	\$4,091.59
PARKER COUNTY ESD #7	Parker	\$3,576.52	N/A	N/A	\$3,576.52
CORRIGAN	Polk	N/A	N/A	\$72,144.60	\$72,144.60
POLK (COUNTY)	Polk	N/A	N/A	\$472,181.35	\$472,181.35
CLARKSVILLE	Red River	\$9,046.60	N/A	N/A	\$9,046.60
RED RIVER (COUNTY)	Red River	\$101,806.00	N/A	N/A	\$101,806.00
BEECHWOOD WATER SUPPLY CORPORATION	Sabine	\$59,266.51	N/A	N/A	\$59,266.51
SABINE (COUNTY)	Sabine	\$298,488.18	N/A	N/A	\$298,488.18
SAN AUGUSTINE (COUNTY)	San Augustine	\$168,448.53	N/A	N/A	\$168,448.53
COLDSRING	San Jacinto	N/A	\$40,270.99	N/A	\$40,270.99
POINT BLANK (CORPORATE NAME FOR POINTBLANK)	San Jacinto	N/A	\$28,310.00	N/A	\$28,310.00
SAN JACINTO (COUNTY)	San Jacinto	N/A	\$1,467,094.11	\$990,334.01	\$2,457,428.12
SAN JACINTO COUNTY EMERGENCY SERVICES DISTRICT	San Jacinto	N/A	N/A	\$13,760.79	\$13,760.79
JOAQUIN	Shelby	\$15,260.33	N/A	N/A	\$15,260.33



APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
PAXTON WATER SUPPLY CORPORATION	Shelby	\$16,054.00	N/A	N/A	\$16,054.00
SHELBY (COUNTY)	Shelby	\$806,645.43	N/A	N/A	\$806,645.43
ARP	Smith	N/A	\$102,665.82	N/A	\$102,665.82
LINDALE	Smith	N/A	\$77,624.84	N/A	\$77,624.84
SMITH (COUNTY)	Smith	N/A	\$198,287.44	N/A	\$198,287.44
WHITEHOUSE	Smith	N/A	\$92,862.90	N/A	\$92,862.90
GLEN ROSE	Somervell	N/A	N/A	\$95,834.00	\$95,834.00
SOMERVELL (COUNTY)	Somervell	N/A	N/A	N/A	N/A
SOMERVELL COUNTY WATER DIST	Somervell	N/A	N/A	\$145,878.54	\$145,878.54
BLUEBONNET ELECTRIC COOPERATIVE, INC.	Statewide	N/A	\$511,568.90	\$1,642,953.76	\$2,154,522.66
CHEROKEE COUNTY ELECTRIC COOPERATIVE	Statewide	N/A	\$294,106.05	N/A	\$294,106.05
HOUSTON CNTY ELECTRIC COOP ASSN, INC	Statewide	N/A	N/A	\$103,186.65	\$103,186.65
JASPER-NEWTON ELECTRIC COOP, INC	Statewide	\$194,700.80	N/A	\$65,633.31	\$260,334.11
LAMAR COUNTY ELECTRIC COOPERATIVE	Statewide	\$333,684.70	N/A	N/A	\$333,684.70
LOWER COLORADO RIVER AUTHORITY	Statewide	N/A	\$1,000,000.00	\$218,769.86	\$1,218,769.86
MID-SOUTH ELECTRIC CO-OP DBA MID-SOUTH SYNERGY	Statewide	N/A	N/A	\$416,205.23	\$416,205.23

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
PANOLA-HARRISON ELECTRIC COOPERATIVE	Statewide	\$29,756.14	\$67,729.05	N/A	\$97,485.19
PORT OF HOUSTON AUTHORITY	Statewide	N/A	\$1,119,370.00	N/A	\$1,119,370.00
SABINE RIVER AUTHORITY OF TEXAS	Statewide	\$1,463,977.67	N/A	N/A	\$1,463,977.67
SAN JACINTO RIVER AUTHORITY	Statewide	N/A	N/A	\$269,053.96	\$269,053.96
TEXAS A&M UNIVERSITY - KINGSVILLE	Statewide	N/A	N/A	\$126,485.46	\$126,485.46
TEXAS A&M VETERINARY EMERGENCY TEAM	Statewide	N/A	N/A	\$77,645.32	\$77,645.32
TEX-LA ELECTRIC COOP OF TEXAS, INC	Statewide	\$55,580.00	N/A	N/A	\$55,580.00
TX A&M FOREST SERVICE	Statewide	\$140,606.03	N/A	\$187,429.54	\$328,035.57
TX A&M ENGINEERING EXTENSION SERVICE	Statewide	\$668,323.14	\$818,299.85	\$1,943,820.12	\$3,430,443.11
TX DEPARTMENT OF CRIMINAL JUSTICE	Statewide	N/A	N/A	\$1,209,027.75	\$1,209,027.75
TX DEPARTMENT OF PUBLIC SAFETY	Statewide	\$379,280.56	\$10,694.00	\$773,423.23	\$1,163,397.79
TX DEPARTMENT OF STATE HEALTH SERVICES	Statewide	\$426,340.33	\$115,656.51	\$206,256.48	\$748,253.32

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
TX DEPARTMENT OF TRANSPORTATION	Statewide	\$474,422.63	\$535,330.00	\$1,281,996.65	\$2,291,749.28
TX DIVISION OF EMERGENCY MANAGEMENT	Statewide	\$447,674.99	\$423,109.00	\$568,799.03	\$1,439,583.02
TX GENERAL LAND OFFICE	Statewide	\$12,889.20	N/A	\$447,607.87	\$460,497.07
TX MILITARY DEPARTMENT	Statewide	\$308,861.28	\$163,743.49	\$481,742.16	\$954,346.93
TX PARKS AND WILDLIFE DEPARTMENT	Statewide	\$393,707.42	\$36,193.41	\$1,681,969.28	\$2,111,870.11
UNIVERSITY OF TEXAS - CENTER FOR SPACE RESEARCH	Statewide	\$52,220.08	\$20,213.53	\$56,228.86	\$128,662.47
WOOD COUNTY ELECTRIC COOPERATIVE	Statewide	N/A	\$550,000.00	N/A	\$550,000.00
BRECKENRIDGE	Stephens	N/A	N/A	\$88,760.68	\$88,760.68
STEPHENS (COUNTY)	Stephens	N/A	N/A	\$1,387,802.51	\$1,387,802.51
THROCKMORTON (COUNTY)	Throckmorton	N/A	N/A	N/A	N/A
TRAVIS (COUNTY)	Travis	N/A	N/A	\$15,000.00	\$15,000.00
TRINITY	Trinity	N/A	N/A	\$8,461.13	\$8,461.13
TRINITY (COUNTY)	Trinity	N/A	N/A	\$1,134,562.67	\$1,134,562.67
COLMESNEIL	Tyler	\$27,710.92	N/A	\$79,841.56	\$107,552.48
COLMESNEIL ISD	Tyler	N/A	N/A	\$12,171.83	\$12,171.83
TYLER (COUNTY)	Tyler	\$427,982.89	N/A	\$251,885.33	\$679,868.22
WOODVILLE	Tyler	\$46,305.00	N/A	\$37,736.36	\$84,041.36
GLADEWATER	Upshur	N/A	\$135,995.57	N/A	\$135,995.57
UPSHUR RURAL ELECTRIC CO-OP	Upshur	N/A	\$819,624.32	N/A	\$819,624.32
VAN ZANDT (COUNTY)	Van Zandt	N/A	\$1,023,459.43	N/A	\$1,023,459.43

APPLICANT NAME	COUNTY	DR-4266	DR-4269	DR-4272	TOTAL
WALKER (COUNTY)	Walker	\$401,839.91	N/A	\$692,957.20	\$1,094,797.11
WALKER COUNTY SPECIAL UTILITY DISTRICT	Walker	N/A	N/A	\$85,696.06	\$85,696.06
BROOKSHIRE	Waller	N/A	\$150,196.04	N/A	\$150,196.04
BROOKSHIRE KATY-DRAINAGE DISTRICT	Waller	N/A	\$1,839,530.40	N/A	\$1,839,530.40
HEMPSTEAD	Waller	N/A	N/A	\$298,593.46	\$298,593.46
MONAVILLE VOLUNTEER FIRE DEPT	Waller	N/A	N/A	\$6,825.55	\$6,825.55
PRAIRIE VIEW	Waller	N/A	\$33,061.44	\$3,445.18	\$36,506.62
WALLER	Waller	N/A	\$7,733.13	\$12,639.68	\$20,372.81
WALLER (COUNTY)	Waller	N/A	\$364,740.31	\$385,017.03	\$749,757.34
BREHAM	Washington	N/A	\$91,804.37	\$3,221,776.98	\$3,313,581.35
BREHAM INDEPENDENT SCHOOL DISTRICT	Washington	N/A	N/A	\$51,756.46	\$51,756.46
FAITH MISSION & HELP CTR	Washington	N/A	N/A	\$134,487.45	\$134,487.45
WASHINGTON (COUNTY)	Washington	N/A	\$185,843.97	\$3,921,894.78	\$4,107,738.75
JUST DO IT NOW, INC.	Wharton	N/A	\$131,632.25	N/A	\$131,632.25
WHARTON	Wharton	N/A	\$312,247.88	N/A	\$312,247.88
WHARTON (COUNTY)	Wharton	N/A	\$214,624.25	N/A	\$214,624.25
WOOD (COUNTY)	Wood	N/A	\$13,912.45	N/A	\$13,912.45

# X. Appendix E – Social Vulnerability Index Scores

University of South Carolina, College of Arts & Sciences, Hazards & Vulnerability Research Institute’s Social Vulnerability Index (SoVI) scores and Percentiles for 2010-2014

County_Name	SoVI (Range Shift)
Anderson	5.7800000
Andrews	7.5699999
Angelina	11.1100000
Aransas	13.1800000
Archer	6.6100001
Armstrong	9.7600000
Atascosa	11.1700001
Austin	8.2700000
Bailey	13.1900000
Bandera	10.0700000
Bastrop	7.7500000
Baylor	10.3600000
Bee	9.4400000
Bell	8.9100000
Bexar	11.7000000
Blanco	10.4200000
Borden	5.0799999
Bosque	11.9100001
Bowie	9.7500000
Brazoria	5.9600000
Brazos	7.8900000
Brewster	11.0700000
Briscoe	11.3200000
Brooks	21.0800004
Brown	11.5200000
Burleson	10.0900000
Burnet	10.8400000
Caldwell	10.9800000
Calhoun	10.4600000
Callahan	9.2500000
Cameron	18.8300004
Camp	11.7999999
Carson	6.5599999

County_Name	SoVI (Range Shift)
Cass	12.3800001
Castro	11.6800000
Chambers	3.4499998
Cherokee	11.6100000
Childress	6.9900000
Clay	8.5700000
Cochran	12.6300001
Coke	11.0900000
Coleman	14.2500000
Collin	3.5799999
Collingsworth	14.2800002
Colorado	11.3300000
Comal	7.2999999
Comanche	13.2300000
Concho	6.0899999
Cooke	10.2500000
Coryell	8.3200000
Cottle	20.0200000
Crane	9.4200000
Crockett	12.2600000
Crosby	15.2800002
Culberson	18.1600003
Dallam	7.7600000
Dallas	10.8700000
Dawson	9.5400000
Deaf Smith	12.4600000
Delta	12.5899999
Denton	4.8200002
DeWitt	11.5399999
Dickens	10.2700000
Dimmit	17.4699998
Donley	11.6300000
Duval	16.5100002
Eastland	12.6500001
Ector	9.6900000
Edwards	17.2899999
El Paso	15.9200001
Ellis	7.4600000
Erath	9.7700000

County_Name	SoVI (Range Shift)
Falls	13.7100000
Fannin	9.1000000
Fayette	10.6500000
Fisher	12.8499999
Floyd	14.0799999
Foard	15.9699998
Fort Bend	4.0100002
Franklin	10.4300000
Freestone	9.7100000
Frio	11.2800000
Gaines	8.2300000
Galveston	7.8700000
Garza	8.9800000
Gillespie	13.6200001
Glasscock	1.6200003
Goliad	9.6300000
Gonzales	13.2899999
Gray	9.3100000
Grayson	10.4000000
Gregg	10.2400000
Grimes	8.3600000
Guadalupe	7.8900000
Hale	11.9600000
Hall	16.0200000
Hamilton	13.3199999
Hansford	9.6000000
Hardeman	14.6599998
Hardin	6.4500000
Harris	9.8700000
Harrison	8.9600000
Hartley	2.3299999
Haskell	10.9400000
Hays	6.9000001
Hemphill	9.9800000
Henderson	10.9900000
Hidalgo	17.6100001
Hill	11.9100001
Hockley	10.4900000
Hood	9.1300000

County_Name	SoVI (Range Shift)
Hopkins	10.2400000
Houston	11.8499999
Howard	9.5800000
Hudspeth	17.2100000
Hunt	9.7700000
Hutchinson	9.7000000
Irion	7.5899999
Jack	5.9400000
Jackson	9.3200000
Jasper	10.3900000
Jeff Davis	13.8499999
Jefferson	10.6000000
Jim Hogg	14.6799998
Jim Wells	14.5000000
Johnson	6.7300000
Jones	7.3399999
Karnes	7.6400001
Kaufman	7.5399999
Kendall	7.0499999
Kenedy	14.8699999
Kent	14.0100002
Kerr	13.8000002
Kimble	15.3800001
King	10.1600000
Kinney	12.4300000
Kleberg	13.1300001
Knox	14.3499999
La Salle	13.3700001
Lamar	12.0699999
Lamb	13.6100001
Lampasas	10.2300000
Lavaca	11.1300000
Lee	9.5000000
Leon	10.9099999
Liberty	7.1700001
Limestone	11.4300000
Lipscomb	5.6399998
Live Oak	10.1900000
Llano	14.5599999



County_Name	SoVI (Range Shift)
Loving	4.7899999
Lubbock	9.9400000
Lynn	12.2100000
Madison	6.5399999
Marion	12.0399999
Martin	9.6000000
Mason	11.9700000
Matagorda	12.6700001
Maverick	19.5300002
McCulloch	11.9700000
McLennan	11.2100000
McMullen	9.8400000
Medina	8.9900000
Menard	15.2600002
Midland	6.9000001
Milam	11.7600000
Mills	11.9800000
Mitchell	6.8700001
Montague	10.0500000
Montgomery	5.5599999
Moore	11.1800000
Morris	12.1800000
Motley	7.2800000
Nacogdoches	10.5400000
Navarro	12.0699999
Newton	9.1100000
Nolan	13.7000000
Nueces	12.8299999
Ochiltree	9.0800000
Oldham	6.2400000
Orange	7.4700000
Palo Pinto	11.2800000
Panola	8.1100000
Parker	5.2700000
Parmer	11.1200000
Pecos	9.1000000
Polk	10.6200000
Potter	12.2000000
Presidio	20.0700002

County_Name	SoVI (Range Shift)
Rains	11.0700000
Randall	7.1200001
Reagan	9.0200000
Real	18.2300000
Red River	13.2000000
Reeves	11.3500000
Refugio	14.7700000
Roberts	4.4800000
Robertson	11.9400000
Rockwall	3.9499998
Runnels	14.0599999
Rusk	7.5399999
Sabine	13.5000000
San Augustine	12.5399999
San Jacinto	9.5500000
San Patricio	11.8700001
San Saba	9.5500000
Schleicher	12.5899999
Scurry	8.6900000
Shackelford	9.1700000
Shelby	10.7500000
Sherman	8.5000000
Smith	10.0700000
Somervell	8.4099999
Starr	23.2500005
Stephens	10.1000000
Sterling	11.0100000
Stonewall	14.3499999
Sutton	9.0500000
Swisher	10.1800000
Tarrant	8.4400000
Taylor	10.9000000
Terrell	13.6700001
Terry	12.2000000
Throckmorton	13.9299998
Titus	11.3300000
Tom Green	11.2200000
Travis	7.0899999
Trinity	14.4800000

County_Name	SoVI (Range Shift)
Tyler	8.400000
Upshur	8.170001
Upton	11.510000
Uvalde	15.880001
Val Verde	15.340001
Van Zandt	10.100000
Victoria	11.260000
Walker	6.410001
Waller	7.920001
Ward	11.360000
Washington	10.160000
Webb	18.419996
Wharton	12.559999
Wheeler	10.180000
Wichita	9.800000
Wilbarger	14.159998
Willacy	17.000000
Williamson	5.789999
Wilson	7.510000
Winkler	11.240000
Wise	6.339999
Wood	11.659999
Yoakum	10.040000
Young	11.630000
Zapata	18.770000
Zavala	19.660003



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

Jennifer Jones  
Deputy Land Commissioner  
Texas General Land Office  
1700 N. Congress Street, Suite 935  
Austin, TX 78701-1495

Dear Ms. Jones:

The Department of Housing and Urban Development (HUD) is approving the State of Texas' Action Plan Amendment (APA) 8 for Community Development Block Grant disaster recovery (CDBG-DR) funds appropriated under the Continuing Appropriations Acts, 2017 Public Laws 114-223, 114-254 and 115-31. HUD allocated \$238,895,000 for long-term recovery from major storms, tornadoes and flooding events that occurred in 2016.

APA 8 reallocates de-obligated and unutilized funds from the Most Impacted (MI) County Method of Distribution (MOD) and Remaining County Allocation Programs. These reallocated funds will now be used for the new Disaster Recovery Reallocation Program (DRRP). The DRRP is designed to provide communities with outstanding unmet needs the opportunity to access remaining CDBG-DR funds. Eligible applicants may apply for DRRP funds for the eligible activities, below. The minimum and maximum award amounts are \$500,000 and \$2,000,000, respectively.

**DRRP Eligible Activities:**

- Housing activities:
  - Rehabilitation, reconstruction, and new construction of affordable multifamily projects, and
- Infrastructure activities:
  - Flood and drainage improvements,
  - Water and wastewater improvements,
  - Street improvements, and
  - Permanently affixed emergency communication equipment.

In addition to creating the DRRP, APA 8 also increases the MI Project Delivery and State Project Delivery budgets.

HUD's approval of an action plan and/or an APA indicates that the plan and/or amendment is substantially complete but does not constitute approval of the grantee's implementation of the activities described in the plan. The Department acknowledges that the State of Texas' submission of APA 8 is substantially complete.

The Action Plan funding allocations, as modified by APA 8, are reflected in the Table 1 below.

**Table 1: CDBG-DR Disaster Allocation**

<b>Program</b>	<b>Previous Allocation</b>	<b>Change</b>	<b>APA 8 Allocation</b>
<b>HUD Most Impacted Counties</b>			
HUD Most Impacted County Method of Distribution (MOD)	\$ 160,824,122	\$ (5,956,230)	\$ 154,867,892
<i>Brazoria County*</i>	\$ 16,990,534	\$ -	\$ 16,990,534
<i>Fort Bend County*</i>	\$ 18,296,408	\$ (4,023,871)	\$ 14,272,537
<i>Harris County*</i>	\$ 66,199,732	\$ (1,131,577)	\$ 65,068,155
<i>Montgomery County*</i>	\$ 23,967,327	\$ (800,782)	\$ 23,166,545
<i>Newton County*</i>	\$ 35,370,121	\$ -	\$ 35,370,121
HUD Most Impacted County Competition	\$ 19,000,000	\$ -	\$ 19,000,000
<b>State Allocation</b>			
Remaining County Allocation (66 counties)	\$ 40,206,023	\$ (343,867)	\$ 39,862,156
MI Project Delivery	\$ 1,624,485	\$ 640,077	\$ 2,264,562
State Project Delivery	\$ 406,120	\$ 160,019	\$ 566,139
<b>DRRP</b>			
Disaster Recovery Reallocation Program (DRRP)	\$ -	\$ 5,500,000	\$ 5,500,000
<b>Planning and Administration</b>			
State Planning	\$ 4,889,500	\$ -	\$ 4,889,500
State Administration (5%)	\$ 11,944,750	\$ -	\$ 11,944,750
<b>Total Allocation</b>	<b>\$ 238,895,000</b>	<b>\$ -</b>	<b>\$ 238,895,000</b>

\*These are the HUD Most impacted (MI) Counties. The combined total is included in the first line item, above. Therefore the individual amounts should not be included separately in the Total Allocation line.

Table 2 below details the allocations and changes to each HUD MID county under the MOD Program, including the allocation between the counties' housing and infrastructure activities.

**Table 2: MOD Distribution of HUD Most Impacted – Updated APA 8\***

County	Previous Housing	Previous Infrastructure	Previous Totals	Current Housing	Current Infrastructure	APA 8 Totals
Brazoria	\$ 699,054	\$ 16,291,480	\$ 16,990,534	\$ 699,054	\$ 16,291,480	\$ 16,990,534
Fort Bend	\$10,636,203	\$ 7,660,205	\$ 18,296,408	\$ 10,636,203	\$ 3,636,334	\$ 14,272,537
Harris	\$ 36,329,837	\$ 29,869,895	\$ 66,199,732	\$ 36,329,837	\$ 28,738,318	\$ 65,068,155
Montgomery	\$ 8,919,523	\$ 15,047,804	\$ 23,967,327	\$ 8,919,523	\$ 14,247,022	\$ 23,166,545
Newton	\$ 10,447,771	\$ 24,922,350	\$ 35,370,121	\$ 10,447,771	\$ 24,922,350	\$ 35,370,121
<b>Total Allocation</b>			\$ 160,824,122			\$ 154,867,892

The Department remains committed to assisting the State of Texas in its efforts to address its recovery needs. If the State has any questions regarding the information in this letter, please contact Ms. Sonya M. Brister, Assistant Director, FTW Region, Grants Management Division, Office of Disaster Recovery, by email at [Sonya.M.Brister@hud.gov](mailto:Sonya.M.Brister@hud.gov).

Sincerely,

**WILLIAM  
BEDFORD**

William L. Bedford  
Director, Grants Management Division  
Office of Disaster Recovery

Digitally signed by WILLIAM  
BEDFORD  
Date: 2024.12.10 11:30:48  
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