



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

December 4, 2020

Tennille Parker
Director, Disaster Recovery and Special Issues Division
Office of Block Grant Assistance
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, DC 20410

RE: Nonsubstantial Amendment 4 – Texas 2015 Floods and Storms CDBG-DR Allocation

Dear Ms. Parker:

The Texas General Land Office (GLO) is pleased to present the State of Texas Plan for Disaster Recovery: Nonsubstantial Amendment No. 4 for 2015 Floods and Storms CDBG-DR allocation. This nonsubstantial amendment reallocates \$855,000 in underutilized Harris County housing funds (no remaining unmet housing need) to infrastructure activities in Harris County's Method of Distribution (MOD). Harris County MOD Amendment 3 was posted for a 14-day public comment period; no comments were received.

Nonsubstantial Amendment No. 4 also updates the GLO's projected expenditures to include the one-year extension provided by HUD through 85 FR 50041 (August 17, 2020) due to the COVID-19 pandemic.

As required by the Federal Register notice, the GLO is notifying HUD of the Action Plan Nonsubstantial Amendment No. 4. HUD will acknowledge receipt of the notification of the nonsubstantial amendment via email within 5 business days. This nonsubstantial amendment will become effective after 5 business days of notification to HUD.

If you need any additional information on the Action Plan Nonsubstantial Amendment No. 4, please feel free to contact Heather Lagrone at heather.lagrone.glo@recovery.texas.gov.

Sincerely,

Alexandra Gamble

Alexandra Gamble
Director, Policy Development
Community Development and Revitalization



State of Texas Plan for Disaster Recovery Amendment No. 4

U.S. Department of Housing and Urban Development (HUD) Section 420 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2016 (Pub. L. 114-113, approved December 18, 2015) and Section 421 of the Consolidated Appropriations Act, 2017 (Pub. L. 115-31, approved May 5, 2017)

Revised: November 30, 2020

Prepared by

Texas General Land Office

Community Development and Revitalization Program

1700 Congress Avenue

Austin, Texas

844-893-8937



Fischer Store Road Bridge in Hays County

Photo Courtesy of the Texas Civil Air Patrol

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Amendment No. 4

This document constitutes the Fourth Amendment (nonsubstantial) to the State of Texas Plan for Disaster Recovery (Action Plan) dated September 20, 2016, for CDBG disaster recovery funds related to the 2015 floods for the 2015 May event (DR-4223) and the 2015 October event (DR-4245).

Harris County amended its County Method of Distribution (MOD) to reflect the current unmet needs of the county. There is no remaining unmet housing need in the 2015 Floods Harris County housing program. Underutilized housing funds will be reallocated from housing to infrastructure activities in the Harris County's MOD. Harris County's MOD amendment reallocated \$855,000 from housing activities to infrastructure activities. Harris County MOD amendment 3 was for posted for a 14-day public comment period by the County. No comments were received.

The GLO updated the projected expenditures to include the one-year extension provided by HUD through 85 FR 50041 (August 17, 2020) due to the COVID-19 pandemic.

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

- II. Needs Assessment
 - Added language referring to adjustments made to the percentage allocated to non-housing and housing based on current unmet recovery needs;
 - Added language referring to adjustments made to Most-Impacted Counties non-housing and housing percentage split due to Harris County MOD amendment 3;
 - Table 4: Allocation Budget updated to account for budget adjustments; and
 - Table 13: Allocation for HUD Most-Impacted Area Counties by Housing and Infrastructure updated to account for Harris County MOD amendment.

- IV. State Administered Disaster Recovery Program
 - Added language referring to adjustments made to the percentage allocated to non-housing and housing based on current unmet recovery needs;
 - Added language referring to adjustments made to Most-Impacted Counties non-housing and housing percentage split due to Harris County MOD amendment 3;
 - Table 1: Most-Impacted Counties MODs (Updated APA 4) updated to account for budget adjustments; and
 - Performance and Expenditure Schedule – Updated projected expenditures based on actual expenditures through September 30, 2020 (Q3 2020). The updated projected expenditures include the one-year extension provided by HUD through 85 FR 50041 (August 17, 2020) due to the COVID-19 pandemic.

Table 1: 2015 Floods CDBG-DR Allocations – Updated APA 4

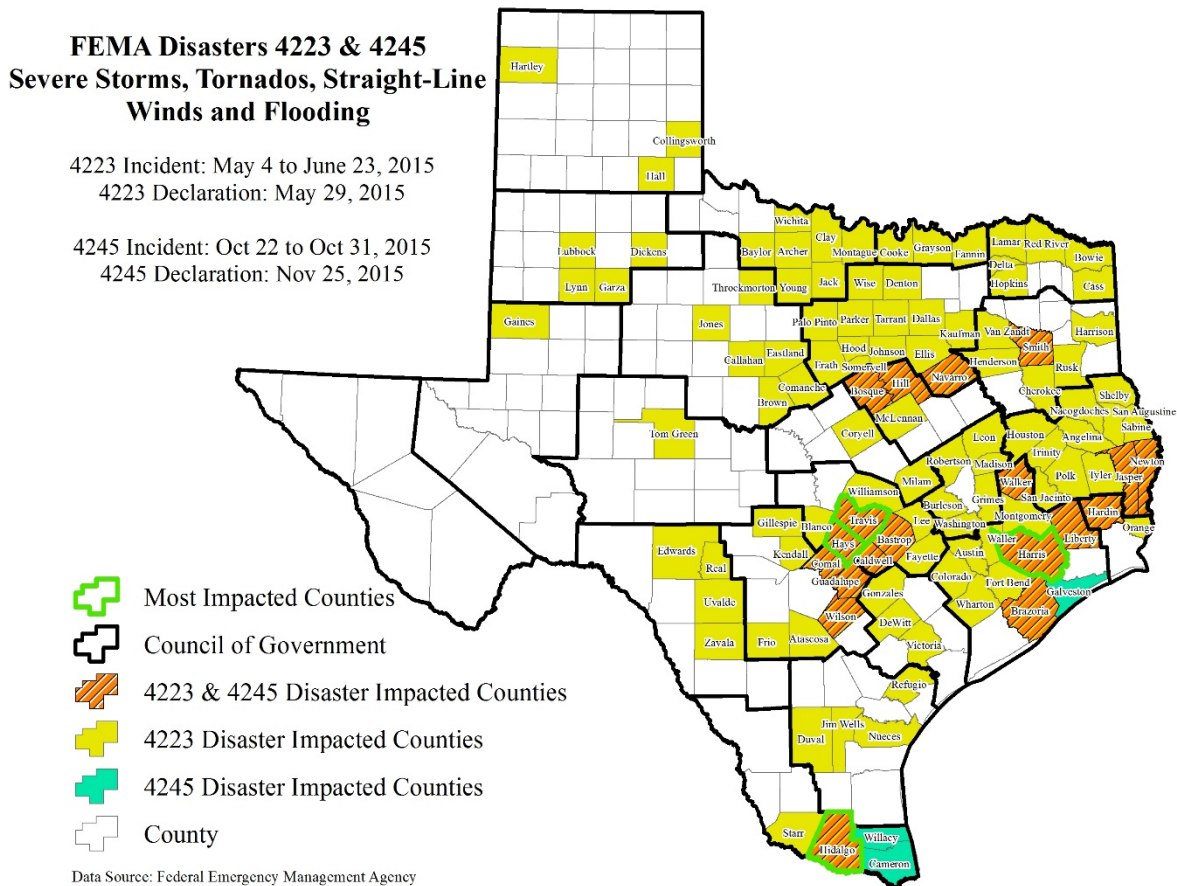
“Most-Impacted” Counties	Previous Allocation	Change	Revised Allocation
Housing	\$10,005,120	(\$855,000)	\$9,150,120
Infrastructure	\$21,260,880	\$855,000	\$22,115,880
State Competition (Remaining 112 Impacted Counties)			
Housing	\$11,470,464	\$0	\$11,470,464
Infrastructure	\$ 24,374,736	\$0	\$ 24,374,736
State Project Delivery	\$534,800	\$0	\$534,800
State Planning	\$3,193,600	\$0	\$3,193,600
State Administration	\$3,728,400	\$0	\$3,728,400
Total	\$74,568,000	\$0	\$74,568,000

I. Executive Summary

In 2015 Texas had two separate events that qualified for appropriation under Public Law 114-113 and Public Law 115-31. Both events resulted from heavy rains and winds that caused severe damage across nearly half the State or 134,000 square miles. The May event (DR-4223), also known as the Memorial Day Floods, occurred May 4 to June 23, 2015, and resulted in a declaration for 113 counties across Texas. The event in October (DR-4245) occurred October 22 to October 31, 2015 and resulted in a declaration for 22 counties. In total, 116 counties were impacted by these disasters, with 19 counties being designated as impacted by both disaster declarations.

Texas has received two allocations of Community Development Block Grant Disaster Recovery (CDBG-DR) funding from the U.S. Department of Housing and Urban Development (HUD) for a total of \$74,568,000. The first allocation of \$50,696,000 was allocated in Federal Register, Vol. 81, No. 117, Friday, June, 17, 2016. The second allocation of \$23,872,000 was allocated in Federal Register, Vol. 82, No. 150, Monday, August 7, 2017.

Figure 1: DR-4223 and DR-4245 Disaster Declarations



On the nights of May 24, 25, and 26, 2015, a slow-moving storm system dropped a tremendous amount of precipitation across much of Texas. The storm was preceded by more than a week of heavy rain which cumulated in record-breaking floods in areas that historically had not previously flooded. In addition to this, many areas reported tornado activity and record lightning strikes. The Blanco River in Hays County was particularly hard hit; entire blocks of homes were leveled.¹ For the first time ever, the Blanco River covered portions of Interstate 35.

During the first part of May, many locations across the State received well above normal rainfall that saturated the soils. When the Memorial Day weekend arrived, much of the region was at least 2-4 inches (100-300%) above average. These conditions meant that new rain would become run-off directly into rivers, streams, and flash flood prone areas. Widespread, 6-8 inches fell across Bandera, Kerr, Kendall, Blanco and far west portions of Comal and Hays counties with a maximum of 10 to 13 inches of rain across southern Blanco and northeast Kendall counties. The majority of this rain fell from Saturday afternoon into the overnight hours of early Sunday morning. This led to the rapid rise in the Blanco and San Marcos Rivers. The Blanco River at Wimberley rose from near 5 feet at 9 p.m. to near 41 feet by 1 a.m. One staggering statistic is that the river rose 5 feet every 15 minutes from 10:45 p.m. to 11:45 p.m. This equates to a 20-foot rise along the river within a 1-hour timeframe (Figure 2).²

Certain areas of Texas saw more than 20 inches of rainfall in a matter of days. In total, about 8 million acre feet of water flowed into the State's reservoirs. In just a matter of 48 hours, enough water fell to supply the needs of a city of 8 million people for 1 year. The amount of water that fell over the 30-day period would put the State of Rhode Island under 10 feet of water. This amount of water could meet New York City's water needs for 7 full years and the water in Lake Mead, the largest reservoir in the U.S., would be doubled.³

In total, the May floods killed 31 people, with 27 of them in Texas and 4 in Oklahoma.⁴ The federal disaster declaration (DR-4223) was made on May 29, 2015, after multiple State disaster declarations from the Governor's office. Based on the FEMA website, in total, there were 12,961 FEMA Individual Assistance applications approved as of August 26, 2016. This preliminary amount totaled \$57,485,212 in individual and household dollars approved. The total for Public Assistance grants (dollars obligated) was \$136,420,956.⁵

¹ <http://kxan.com/2015/05/24/hays-county-hundreds-of-homes-damaged-or-destroyed-1000-people-in-shelters/>

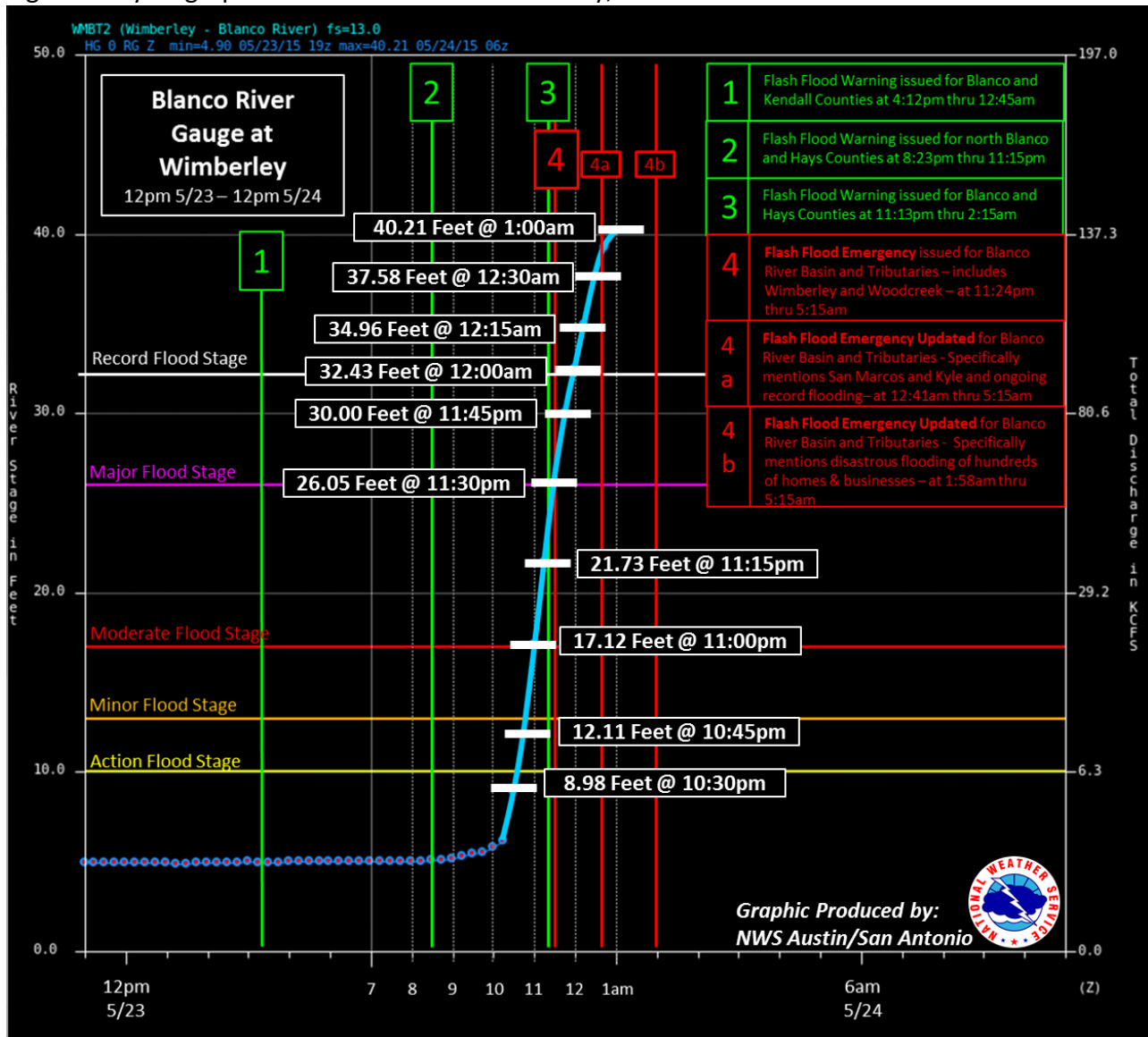
² http://www.srh.noaa.gov/ewx/?n=memorial_weekend_floods_2015

³ <https://www.washingtonpost.com/news/wonk/wp/2015/05/27/the-insane-amount-of-rain-thats-fallen-in-texas-visualized/>

⁴ <http://www.wsj.com/articles/u-s-storms-floods-kill-29-people-25-of-them-in-texas-1433006237>

⁵ <https://www.fema.gov/disaster/4223>

Figure 2: Hydrograph for Blanco River at Wimberley, TX



Central and eastern Texas were also hit by dangerous flooding in October of 2015 when rainfall patterns converged with remnants of Hurricane Patricia. In total 22 counties were part of this disaster declaration (DR-4245). Based on the FEMA website, in total, there were 3,303 FEMA Individual Assistance applications approved as of August 26, 2016. This totaled \$18,511,273 in individual and household dollars approved. The total for Public Assistance grants (dollars obligated) was \$15,020,993.⁶

⁶ <https://www.fema.gov/disaster/4245>

For both disasters, the total individual assistance applications approved was 16,264. Total individual and households program dollars approved totaled \$75,996,485. The total public assistance grants dollars obligated totaled \$151,441,949 for both disasters with emergency work totaling \$24,225,018 and permanent work totaling \$125,378,096. In total, widespread flooding in 2015 could cost Texas upward of \$3 billion, largely from damage to soaked roads and public infrastructure.⁷

Table 2: Total FEMA Assistance by Assistance Type

	Total Individual Assistance (IA) - Applications Approved:	Total Individual & Households Program - Dollars Approved	Total Housing Assistance - Dollars Approved	Total Other Needs Assistance - Dollars Approved
Total – 4223	12,961	\$57,485,212	\$45,090,260	\$12,394,951
Total – 4245	3,303	\$18,511,273	\$14,609,755	\$3,901,518
Total - 4223 & 4245	16,264	\$75,996,485	\$59,700,016	\$16,296,469
	Total Public Assistance Grants - Dollars Obligated*	Emergency Work (Categories A-B) - Dollars Obligated	Permanent Work (Categories C-G) - Dollars Obligated	
Total – 4223	\$136,420,956	\$22,604,542	\$112,255,512	
Total – 4245	\$15,020,993	\$1,620,476	\$13,122,584	
Total - 4223 & 4245	\$151,441,949	\$24,225,018	\$125,378,096	

⁷ <http://www.chron.com/news/houston-texas/texas/article/texas-flood-damage-cost-climate-change-el-ni-o-6594008.php>

II. Needs Assessment

The State of Texas needs assessment takes into account a variety of data sources that cover multiple geographies. Given the extent of counties impacted by the disasters, the unmet need calculations for non-housing were determined using data provided by the Texas Division of Emergency Management (TDEM) for all applicants which comes from the Emergency Management Mission Integrated Environment (EMMIE) database. The State's unmet need for non-housing totals \$69,689,983 and increases to \$80,143,480 when including a resiliency multiplier of 15% (\$10,453,497). The data for housing unmet needs comes from TDEM and the National Emergency Management Information System (NEMIS) database. The State's unmet need for housing totaled \$69,440,104. This figure increases to \$79,856,120 when including the resilience multiplier of 15% (\$10,416,016).

Unmet need as identified by the Small Business Administration (SBA) is \$132,391,924 for housing and \$23,218,266 for businesses. Per FEMA and SBA data, unmet need for the state of Texas totals \$315,609,790. These estimates are only looking at FEMA IA and PA estimates and SBA estimates and do not take into consideration lost property valuation, sales tax revenue, unemployment, agricultural losses, and loss of tourism revenue.

The below information provides a State of Texas unmet needs foundation and basis, as well as a concise breakdown of how funds should be allocated to the 4 most impacted counties and the additional 112 other counties in Texas.

Table 3: Total Unmet Need

Sector	Unmet Need
Non-Housing (Including Resiliency)	\$80,143,480
Housing (Including Resiliency)	\$79,856,120
SBA Housing	\$132,391,924
SBA Business	\$23,218,266
Total	\$315,609,790

The HUD most-impacted area consists of 4 counties: Harris, Hays, Hidalgo, and Travis. These 4 counties have been designated a total of \$34,740,000 out of the total \$74,568,000 that the State has been allocated. This amount decreases after accounting for 5% for administrative costs and 5% for planning. The total to be spent on housing is \$9,150,120 (29%) and the total to be spent on infrastructure activities is \$22,115,880 (71%).

The remaining 112 impacted counties have \$39,828,000 identified out of the \$74,568,000 that the State has been allocated. This amount decreases after accounting for 5% administration

and 5% for planning. The total to be spent on housing by the State is \$11,470,464 (32%) and the total to be spent on infrastructure activities is \$24,374,736 (68%).

Table 4: Allocation Budget⁸

“Most-Impacted” Counties	Total
Housing	\$9,150,120
Infrastructure	\$22,115,880
State Competition (Remaining 112 Impacted Counties)	Total
Housing	\$11,470,464
Infrastructure	\$ 24,374,736
State Project Delivery	\$534,800
State Planning	\$3,193,600
State Administration	\$3,728,400
Total	\$74,568,000

The GLO may adjust the percentage allocated to non-housing and housing based on current unmet recovery needs. APA 4 adjusts the housing and infrastructure split for “Most-Impacted” Counties due to Harris County MOD amendment 3. The other three Counties maintain the 68% infrastructure and 32% housing split.

A. Pre-Disaster Baseline Data

1. Conditions Before the Disaster

According to Texas A&M Real Estate Center’s Monthly Review of the Texas Economy for April 2015, “The Texas economy gained 320,400 nonagricultural jobs from March 2014 to March 2015, an annual growth rate of 2.8% compared with 2.3% for the United States. The State’s nongovernment sector added 304,300 jobs, an annual growth rate of 3.2% compared with 2.6% for the nation’s private sector. Texas’ seasonally adjusted unemployment rate fell to 4.2% in March 2015 from 5.3% in March 2014. The nation’s rate decreased from 6.6 to 5.5%.”⁹

Despite the events Texas suffered in 2015, the Texas economy has steadily continued to grow. Per the Texas Workforce Commission, the unemployment rate in Texas decreased from 5.1% in 2014 to 4.5% in 2015.¹⁰ Overall sales tax for the 2015 fiscal year saw an increase of 18%.¹¹ With the setback of these events, the State was still able to maintain and recover with overall

⁸ \$1.00 has been removed from the state competition infrastructure budget and added to the “most-impacted” counties infrastructure budget to make the dollar figures whole numbers.

⁹ <https://assets.recenter.tamu.edu/Documents/Articles/1862-201504.pdf>

¹⁰ <http://www.tracer2.com/cgi/dataanalysis/AreaSelection.asp?tableName=Labforce>

¹¹ http://www.texasparency.org/State_Finance/Revenue/Revenue_Watch/general-revenue/

positive growth. For this reason, the State will not specifically set aside funds for economic recovery, but will make economic recovery activities eligible under the non-housing program.

Prior to May 2015 the State of Texas experienced a historic drought that began in October 2010 (Figure 2). 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.¹²

Figure 3: Texas Drought Monitor

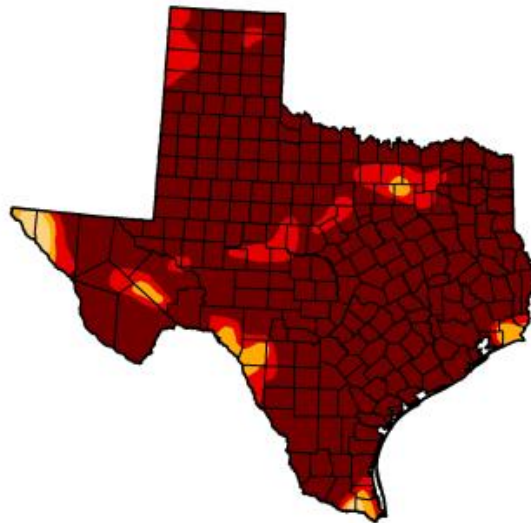
U.S. Drought Monitor

Texas

September 13, 2011
Valid 7 a.m. EST

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	95.68	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

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 in Texas 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 record-breaking high temperatures. These weather conditions, combined with the availability of large amounts of dry fuels, led to the intensity of these wildfires. Bastrop County

¹² http://climatexas.tamu.edu/files/osc_pubs/2011_drought.pdf

specifically experienced the most destructive fire with a final count of 34,457 acres burned and 3,017 homes destroyed and/or severely damaged.¹³

The State’s water reservoirs at the start of the drought in October 2010 were 83.8% full with the lowest level at 58.5% full in November and December 2011. The reservoirs were only 68% full on average statewide during the drought years.¹⁴ The extended drought that Texas experienced made the State susceptible to wildfires and flash flooding. These drought factors contributed to the inability for soils to effectively absorb water runoff. The wildfires also led to worse flooding, by removing vegetation that can slow down and trap rainfall. When the State received record amounts of rain not once but twice in 2015 it created the perfect environment for widespread and severe flooding.

2. 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 of Texas.¹⁵ Between 2000 to 2010, Texas population grew 17% and the number of households increased 15%.

Table 5: 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% while Texas was growing at 7% during that five-year period. With this kind of growth, both new development and redevelopment are occurring in the diverse landscape of Texas.”¹⁶

Over the period of 2006-2010 almost 3.5 million households, or over 1/3 of total Texas households, made only 80% or less of area median family income (AMFI). “There is also a general shortage of housing in Texas. According to the Texas A&M Real Estate Center, in January 2014 there was only a 3.3-month inventory of housing for sale, which was the lowest supply since 1990.” From 2000 to 2010 the median home value increased 59%, and the median

¹³ Texas Forest service

¹⁴ <http://waterdatafortexas.org/reservoirs/statewide>

¹⁵ <http://www.tdhca.state.tx.us/board/docs/books/141218-Item1h-2015-2019-StateofTexasConsolidatedPlan.pdf>

¹⁶ Page 123: <http://www.tdhca.state.tx.us/board/docs/books/141218-Item1h-2015-2019-StateofTexasConsolidatedPlan.pdf>

contract rent increased 28%. The 2015 flood's impact on housing stock compounds the lack of affordable housing and potentially places families at higher risk of becoming homeless.

3. Pre-Disaster Homelessness

The State of Texas has a fairly 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 required to specifically address pre-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.

In 2013, Texas had almost 30,000 people experiencing homelessness, nearly 9,000 individuals were registered as chronically homeless.¹⁷ 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.¹⁸

TDHCA's Homeless Housing and Services Program (HHSP) provides funding to the eight largest cities in support of services to homeless individuals and families.¹⁹ 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 exited to permanent housing in 2013-2014 program years: 3,052.

¹⁷ http://www.thn.org/images/Promocompressed_1.pdf

¹⁸ <http://www.thn.org/>

¹⁹ <http://www.tdhca.state.tx.us/community-affairs/hhsp/>

- 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.*

DSHS's Projects for Assistance in Transition from Homelessness (PATH) program provides outreach; screening, diagnostic assessment and treatment; habitation and rehabilitation; community mental health services; outpatient alcohol or drug treatment (for clients with serious mental illness); staff training; case management; referrals for primary health services, job training, educational services (including HIV prevention activities), and relevant housing services; assistance in obtaining income support services including Social Security Income and representative payee per appropriate regulations; housing services including planning for housing; technical assistance in applying for housing assistance; and improving coordination of housing and services and the costs of matching individuals with appropriate housing and services.²⁰ The service areas are Amarillo, Austin, Beaumont, Conroe, Corpus Christi, Dallas, El Paso, Fort Worth, Galveston, Harlingen, Houston, Laredo, Lubbock, San Antonio, and Waco. The State will also utilize HUD's homeless information web page that we will share with all eligible communities to support their homeless prevention efforts.²¹

B. Housing Disaster Impacts²²

In reviewing the FEMA Information and Data Analysis (FIDA) database provided by TDEM, there were 47,350 individual and household applicants for assistance tied to disasters DR-4245 and DR-4223. there were 5,808 applicants impacted by both disasters. This dataset signifies the number of applicants from individuals and households for individual assistance from FEMA and is a dataset based on all the individual inspections FEMA does on private homes registered for assistance. Being that certain residents were impacted by both disasters; this shows the extent and severity of both disasters. The sequence of delivery for these applications identified in the FIDA dataset follows as such: FEMA Housing Assistance, Small Business Administration (SBA), and FEMA-State Other Needs Assistance (ONA).

Data tied to housing unmet need comes from the Individual Assistance (IA) program and the FEMA NEMIS database. In total, there are 53 counties across Texas that suffered losses relating to housing to such a degree that they qualified for assistance. In the FEMA IA program administered by TDEM, there is a total of 18,283 households that are demonstrating unmet needs for all 53 counties. This figure is slightly higher than the IA figures found on the FEMA website which show a total of 16,264 total individual applications approved as of August 23, 2016. This is due to the fact that the NEMIS database is accounting for all applicants and the FEMA website is accounting for all IA applications approved. Unmet needs are defined as FEMA Verified Loss Amounts less the total amount of assistance being provided to households.²³ This

²⁰ <http://www.dshs.texas.gov/mhprograms/path.shtm>

²¹ <http://portal.hud.gov/hudportal/HUD?src=/states/texas/homeless>

²² Data provided by the Texas Division of Emergency Management (TDEM)

²³ Data provided by the Texas Division of Emergency Management (TDEM)

assistance consists of IA, SBA, Insurance and other assistance provided to households. For these 53 counties in Texas, there is a total unmet housing need of \$69,440,104. Recipients of CDBG-DR housing funds will be required to execute subrogation agreements in the event future insurance or other funding are made to the recipients. Infrastructure agreements will carry similar language.

Due to limitations of data sets on a statewide basis, the housing needs of single-family housing vs. multi-family housing, and homeowner vs. rental 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.

C. Non-Housing Disaster Unmet Needs²⁴

Through coordination with TDEM, the State of Texas could compile a list of Public Assistance (PA) applicants for both disasters DR-4223 and DR-4245. These figures come from the FEMA EMMIE database as of July 8, 2016. The projected project amount is what FEMA and the locality determine to be the total of what will 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 Federal matching funds of the total eligible amount. For projects relating to these disasters, it should be expected that the total eligible amount will reach the projected project amount; however, the two will not balance until the application is closed.

It is the projected project 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 project amount, it is the remaining 25 percent of the projected project amount that signifies non-housing unmet need for these localities. For all impacted counties in Texas, there is a projected project amount of \$228,618,400 for DR-4223 and \$50,141,530 for DR-4245. The total projected project amount for both disasters is \$278,759,930. The 25 percent local match, or unmet need, total is \$69,689,983 for the State of Texas.

Because so much of the State was impacted by these 2015 events and property valuations occur locally by county on differing schedules, the impact on property values is impossible to determine, but should be noted as a long-term impact of the ability of communities to recover using their own resources.

D. 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 development investments from future disasters. As

²⁴ Data provided by the Texas Division of Emergency Management (TDEM)

such, Texas will not only be assessing applications and consider State-run programs that replace or repair lost property but will also be seeking to invest resources in efforts that mitigate damage from future disasters. Although initially costlier, these efforts prevent future damages that quickly exceed initial investments.

Single family home resiliency solutions are expected to add 10 percent to 15 percent to the total cost per home, multi-family 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 are 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. Multi-family resiliency solutions include elevation, retention basins, fire-safe landscaping, firewalls, landscaped floodwalls, and a combination of both single family & infrastructure solutions.

Infrastructure resiliency solutions include raising facilities above base flood elevation, having backup power generators for critical systems (water, sewer, etc.), elevating critical systems, retention basins, firewalls, larger culverts, culvert debris guards, erosion control solutions, raising roadways, and redundant communication systems.

A large number of affected homeowners have faced difficulty in securing sufficient resources to fully rebuild their homes. The State will take a comprehensive approach when examining how best to assist households with unmet needs. This inclusive strategy will examine what funding sources are available and how those sources can be combined to create a holistic solution to the issues facing residents and communities. The State has been proactive in putting into place measures that would address resiliency and sustainability, as well as educating the public to minimize risk for both communities and individuals.

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 infrastructure.

Table 6: Total Unmet Need with Resiliency Factor

Unmet Need Category	Unmet Need	Resiliency Factor (15%)	Total Unmet Need with Resiliency
Non-Housing	\$69,689,983	\$10,453,497	\$80,143,480
Housing	\$69,440,104	\$10,416,016	\$79,856,120
Total	\$139,130,087	\$20,869,513	\$159,999,600

E. Economic Revitalization

1. Small Business Administration (SBA) Data²⁵

For both disaster declarations in Texas, the Small Business Administration (SBA) issued a total of 24,470 applications for the State of Texas. The total number of applications received for both disasters was 6,230 and the total number of loans approved by the SBA was 2,525. For both disasters, the total dollar amount of loans approved was \$116,385,000.

Home loans (2,331) far surpassed the business and Economic Injury Disaster Loan (EIDL) amounts (186) as well as surpassing the non-profits loans approved (8). TDEM confirmed that these home loan amounts were accounted for as assistance provided in the development of their unmet needs report for Texas.

2. Economic Revitalization Unmet Needs

Aside from using TDEM's SBA loan data, the SBA provides disaster loan data for disasters designated by fiscal years.²⁶ The SBA was able to provide data for DR-4223 and DR-4245. This comprehensive dataset shows figures for both home loan data as well as business loan data. The total verified loss for homes, per the SBA, totals \$228,804,924. The total SBA-approved loan amount is \$96,413,000. These figures show that there is a difference, or unmet need, of \$132,391,924 in what is identified as total verified loss and the total loan amounts approved. The figures for DR-4223 and DR-4245 in the area of business loan data are significantly lower showing a total verified loss of \$43,359,966 and a total approved loan amount of \$20,141,700. This is a difference of \$23,218,266, which can be translated into unmet needs for the business sector in Texas.

Table 7: Total Economic Revitalization Unmet Need

SBA Disaster Loan Type	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Home Loans	\$228,804,924	\$96,413,000	\$132,391,924
Business Loans	\$43,359,966	\$20,141,700	\$23,218,266
Total	\$272,164,890	\$116,554,700	\$155,610,190

These data help the State in identifying some verified loss for businesses in Texas. Given the strong and diverse economy of Texas, identifying localized economic revitalization indicators proved difficult in making concrete determinations. As stated above, the State will not specifically set aside funds for economic recovery, but it is an eligible use under the non-housing program.

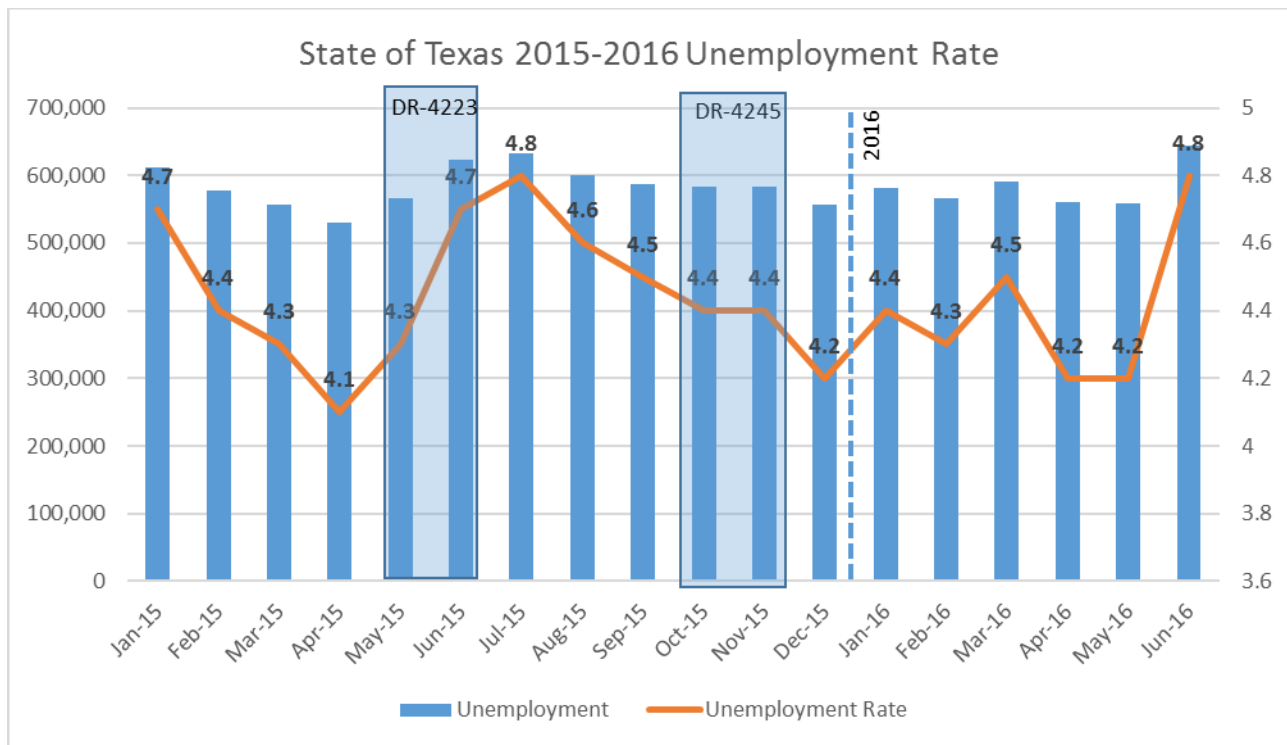
²⁵ Data provided by the Texas Division of Emergency Management (TDEM)

²⁶ Small Business Administration: <https://www.sba.gov/loans-grants/see-what-sba-offers/sba-loan-programs/disaster-loans/disaster-loan-data>

3. Texas Unemployment Rate²⁷

As counties work to respond to recovery efforts relating to housing and infrastructure, there is also an impact on the economy that must be noted. Local communities must take into account impacts on the local economy and unemployment rate. As can be seen below, the State of Texas was experiencing a significant drop in the unemployment rate prior to the May 2015 floods. There is an increase in the unemployment rate from 4.1 percent in April 2015 to 4.7 percent in June of the same year (Figure 3). While it cannot be stated that this increase is directly attributed to the May 2015 flooding events, this figure is significant. The unemployment rate began to decrease to pre-disaster levels toward the end of 2015, and leveled out during the time of the October flooding event. Rates stayed below 4.5% into the beginning of 2016 and show a significant spike between May and June of 2016 from 4.2% to 4.8%.

Figure 4: Texas Unemployment Rate



²⁷ Texas Workforce Commission:
<http://www.tracer2.com/cgi/dataanalysis/AreaSelection.asp?tableName=Labforce>

F. Total Unmet Need for the State of Texas

After compiling the data and making the calculations for unmet need for the State of Texas, the total amount of unmet need is **\$315,609,790**.

G. Housing and Non-Housing Funding Allocation²⁸

As the State made determinations for how to allocate funds for the State Competition and the most impacted area allocation, it was decided that it would use the most reliable data available to pull out unmet need figures. When making the determination on how to break up allocations relating to housing and non-housing, the State totaled the FEMA PA projected amount and then multiplied this by the 25 percent local match requirement after removing the Cities of Houston and San Marcos projected project amounts. This signified the unmet need for non-housing for the State allocation. The total unmet need for housing was then calculated and the unmet needs for Houston and San Marcos were removed. The total unmet need tied to the allocation breakdown for non-housing for the State of Texas is \$66,836,371. For housing unmet need tied to the allocation breakdown in the State of Texas, the total is \$31,650,930.

Table 8: Total Public and Individual Assistance Unmet Need

Geography	FEMA PA Projected Amount	25% of PA (Local Match)	FEMA IA Unmet Need Amount
Total All Counties	\$278,759,930		\$69,440,104
- City of Houston	-\$7,697,444		-\$34,710,855
- City of San Marcos	-\$3,717,003		-\$3,078,320
Counties with Cities Removed	\$267,345,483	\$66,836,371	\$31,650,930

These two figures show a final non-housing and housing percent breakdown of 68 percent for infrastructure and 32 percent for housing.

The State of Texas considered the overall impact of the 2015 floods to the entire State to establish the non-housing and housing allocations versus that of specific counties. When utilizing FEMA IA and PA figures it should be considered that IA figures are not exclusively limited to direct housing needs but also include other needs assistance as well. Further the needs of impacted counties must meet a threshold to qualify for both IA or PA assistance but a declaration for either makes a county eligible for an award for all activities. This decision also in part considered the very large impact area for this allocation and the limited funds available, and the higher administrative costs to implement housing programs across a large impacted area. Texas has 116 counties across the state that are eligible for the 2015 funding. With

²⁸ Data provided by the Texas Division of Emergency Management (TDEM)

previous CDBG-DR funded programs only 7-8 homes are replaced per million dollars received as opposed to an infrastructure project that could serve 10 times as many homes and other area assets. The State will realize a more effective and comprehensive recovery by focusing funds on projects that benefit a larger area of low-to-moderate income populations and support and protect housing and communities in an effort to reduce repetitive losses in lieu of directly replacing single homes.

The below table also shows a total unmet need of \$98,487,300 for both non-housing and housing to inform the allocation breakdown. These percentages will be used by the State of Texas to allocate funding for the most-impacted area as well as the remaining 112 eligible Texas counties for the State Competition.

Table 9: Percentage of Non-Housing and Housing Unmet Need

Category	Unmet Need Related to Allocation	Percent of Total
Non-Housing	\$66,836,371	68%
Housing	\$31,650,930	32%
Total	\$98,487,300	100%

1. HUD Most-Impacted Area Counties Housing Allocation

As designated in the Federal Register for this allocation, the City of Houston and the City of San Marcos will be receiving direct allocations for recovery relating to these disasters. It was therefore important to pull out unmet need tied to both of these cities from their respective county totals. This was done by using addresses and latitude and longitude points for each household demonstrating unmet need within Houston and San Marcos to identify addresses that might have Houston or San Marcos in their mailing address but actually lie outside the city limits. Using ESRI ArcGIS, the housing unmet needs latitude and longitude points were placed over the city limits and the addresses within the city limits were isolated and withdrawn from the county total for Harris and Hays counties.

As stated below, this method shows that the City of Houston has an unmet need of \$34,710,855 and the City of San Marcos with an unmet need of \$3,078,320. This brings the State total of unmet housing need relating to the allocation breakdown from \$69,440,104 to \$31,650,930. Through this method, Harris County was able to account for \$633,275 of unmet need for houses that lie within the county and have Houston addresses. San Marcos figures show a difference of \$1,147,249 between homes that lie within the city limits and homes outside the city.

Table 10: Individual Assistance for the HUD Most-Impacted Area Counties

HUD Most-Impacted Area Counties	IA Unmet Need: FEMA Verified Loss - Amount of Assistance
Harris	\$36,869,764
- Houston City Limits	\$34,710,855
Harris w/out Houston City Limits	\$2,158,909
Hays	\$9,896,766
- San Marcos City Limits	\$3,078,320
Hays w/out San Marcos City Limits	\$6,818,446
Hidalgo	\$1,815,789
Travis	\$3,715,483
Total	\$14,508,627

2. HUD Most Impacted Area Counties Non-Housing Allocation

Using data from the FEMA EMMIE database, TDEM was able to provide projected amounts for the 4 most-impacted counties: Harris, Hays, Hidalgo, and Travis. Figures for both disaster declarations were summed for each of the counties. Figures for both Houston and San Marcos were isolated in order to remove these figures from Harris and Hays Counties. This is a total projected project amount of \$36,866,107. When factoring in the 25 percent local match, which can be considered unmet need for these funds, the total unmet need is \$1,109,992 for Harris County, \$1,963,572 for Hays County, \$3,299,059 for Hidalgo County, and \$2,843,905 for Travis County. This puts the total unmet need for non-housing at \$9,216,527 for the four most impacted counties in Texas.

Table 11: Public Assistance for the HUD Most-Impacted Area Counties

HUD Most-Impacted Area	Projected Project Amount (DR-4223)	Projected Project Amount (DR-4245)	Projected Project Amount (DR-4223 + DR-4245)	25% Local Match (PA Unmet Need)
Harris	\$12,137,411	\$-	\$12,137,411	
- Houston	-\$7,067,275	\$-	-\$7,067,275	
- Houston ISD	-\$630,169	\$-	-\$630,169	
Harris w/out Houston	\$4,439,967	\$-	\$4,439,967	\$1,109,992
Hays	\$4,709,206	\$6,862,083	\$11,571,289	
- San Marcos	-\$582,850	-\$2,268,000	-\$2,850,850	
- San Marcos Housing Authority	-\$566,153	-\$300,000	-\$866,153	
Hays w/out San Marcos	\$3,560,203	\$4,294,083	\$7,854,286	\$1,963,572
Hidalgo	\$8,269,137	\$4,927,099	\$13,196,235	\$3,299,059
Travis	\$4,405,181	\$6,970,437	\$11,375,618	\$2,843,905
TOTAL w/out Houston & San Marcos	\$20,674,488	\$16,191,619	\$36,866,107	\$9,216,527

To determine the allocation breakdown for the four most impacted counties, the total unmet needs for non-housing and housing were added for each of the counties. The total unmet needs for the four most impacted counties, less Houston and San Marcos, was totaled. Each county was then allocated funds based on their prorated share of the total.

Table 12: Allocation for HUD Most-Impacted Area Counties²⁹

HUD Most-Impacted Area	PA Unmet Need	IA Unmet Need	PA + IA Unmet Need	PA + IA Unmet Need % of Total	1 st Allocation	2 nd Allocation	Total
Harris	\$1,109,992	\$2,158,909	\$3,268,901	14%	\$2,756,457	\$1,551,438	\$4,307,895
Hays	\$1,963,572	\$6,818,446	\$8,782,017	37%	\$7,405,319	\$4,167,991	\$11,573,310
Hidalgo	\$3,299,059	\$1,815,789	\$5,114,847	22%	\$4,313,027	\$2,427,533	\$6,740,560
Travis	\$2,843,905	\$3,715,483	\$6,559,387	28%	\$5,531,116	\$3,113,119	\$8,644,235
TOTAL	\$9,216,527	\$14,508,627	\$23,725,153	100%	\$20,005,919	\$11,260,081	\$31,266,000

Allocations for these four most impacted counties will be broken down by the statewide percentages of 68 percent for infrastructure and 32 percent for housing.

Table 13: Allocation for HUD Most-Impacted Area Counties by Housing and Infrastructure (Updated APA 4)

HUD Most-Impacted Area	Housing Allocation	Infrastructure Allocation	Total Allocation
Harris County	\$523,527	\$3,784,368	\$4,307,895
Hays County	\$3,703,459	\$7,869,851	\$11,573,310
Hidalgo County	\$2,156,979	\$4,583,581	\$6,740,560
Travis County	\$2,766,155	\$5,878,080	\$8,644,235
Total	\$ 9,150,120	\$ 22,115,880	\$31,266,000

The GLO may adjust the percentage allocated to non-housing and housing based on current unmet recovery needs. APA 4 adjusts the housing and infrastructure split for Harris County due to Harris County MOD Amendment 3. The other three Counties maintain the 68% infrastructure and 32% housing split.

3. State Competition Allocation Breakdown

The final breakout for the counties that are part of the State Competition will be \$24,374,736 to be spent on infrastructure and \$11,470,464 to be spent on housing. For the competition, the State will be looking at distress factors and will be considering the Texas Regional Review Committee’s objective scoring criteria to serve as a springboard for additional qualifying criteria.

²⁹ \$1 has been added to Harris County 2nd allocation so that funds could be distributed amongst the four most impacted counties in order to make the dollar figures whole numbers.

Table 14: Allocation for State Competition by Housing and Infrastructure

State Competition	1st Allocation	2 nd Allocation	Total Allocation
Housing Allocation (32%)	\$8,198,554	\$3,271,910	\$11,470,464
Infrastructure Allocation (68%)	\$17,421,927	\$6,952,809	\$24,374,736
Total	\$25,620,481	\$10,224,719	\$35,845,200

H. Local and Regional Planning Initiatives

1. 2017 Texas State Water Plan

The Texas Water Development Board State Water plan is based on 16 regional water plans and addresses the needs of all water user groups in the State – municipal, irrigation, manufacturing, livestock, mining, and steam-electric power – during a potential repeat of the drought of record that the State suffered in the 1950s. The regional and State water plans consider a 50-year planning horizon: 2020 through 2070.³⁰

2. Drainage Studies

The Texas Water Development Board offers grants to political subdivisions of the State of Texas for evaluation of structural and nonstructural solutions to flooding problems. Upstream and/or downstream effects of proposed solutions must be considered in the planning. The proposed planning must be regional in nature by considering the flood protection needs of the entire watershed.³¹

The Community Development and Revitalization program of the GLO is also partnering with the Texas Water Development Board on the Lower Rio Grande Valley Colonia Drainage Study. The purpose of this storm water drainage planning project is to develop the necessary drainage planning required to examine the infrastructure needs in the Colonias.

I. Key Parties Involved in Recovery to Date

There have been multiple organizations involved with 2015 floods recovery. Local, state, and federal levels of government, non-profit, and private sector entities have been involved in addressing the effects of the 2015 floods. For example, Travis County created the Travis Austin

³⁰ <https://2017.texasstatewaterplan.org/statewide>

³¹ <http://www.twdb.texas.gov/flood/grant/fpp.asp>

Recovery Group, a non-profit, to provide direct assistance to survivors.³² Bastrop County has the Bastrop County Long Term Recovery Team that helps uninsured or underinsured residents.³³

TDEM has been instrumental in working with localities to document the damage immediately after the floods and then collate this information to support a Presidential Major Disaster Declaration.³⁴

The Texas General Land Office Community Development and Revitalization (GLO-CDR) program has a web page dedicated to sharing the pertinent information to assist with recovery efforts and administer the CDBG-DR 2015 flood allocation for the State of Texas. This includes a survey to help identify the remaining unmet needs and priorities from localities. The website, TexasRebuilds.org, will also be utilized for the administration of the 2015 floods allocation.

³² <https://www.traviscountytexas.gov/emergency-services/es-news/2015-flood-news>

³³ <http://www.bastropcountylongtermrecovery.org/>

³⁴ <https://www.txdps.state.tx.us/dem/>

III. General Requirements

A. 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. 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 the future well-being of these damaged areas such as modernization of public facilities, stimulation of the local economy, the rebuilding of housing stock, and the hardening of homes and infrastructure so that communities withstand future disasters.

The GLO will coordinate with other local and regional planning efforts to leverage those efforts as much as possible.

B. Leveraging Funds

The GLO will encourage subgrantees to leverage CDBG-DR funds with funding provided by other Federal, State, local, private, and nonprofit sources to utilize the limited CDBG-DR funds to the fullest possible extent. The GLO will report on leverage funds in the DRGR system.

C. 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. 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 2 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. All work performed by the contractor will be guaranteed for a period of 1 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 filed complaint or appeal that the GLO is kept in an information file. When a complaint or appeal is filed, 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 right 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. 117, Friday, June, 17, 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 subgrantees use CDBG-DR funds for levees and dams the subgrantees 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.

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. Public Housing, HUD-assisted Housing, Housing for the Homeless, and Affirmatively Furthering Fair Housing

The GLO’s subgrantees and/or 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 subgrantees and/or subrecipients will identify these projects either in the county methods of distribution for the HUD-identified most impacted area counties, or submit the project to the State Competition as applicable.

All subgrantees and/or subrecipients will certify that they will affirmatively further fair housing (“AFFH”) in their grant agreements, and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval. 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.

F. Broadband Infrastructure

As required by the Federal Register, Vol. 81, No. 117, Friday, June, 17, 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 subgrantee 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.

G. Disaster Resistant Housing

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 2015 storms and floods for specific disaster-related purposes. While these funds do not exclude eligibility to homeless individuals or other special needs populations, they are not set-aside 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, the State of Texas has a fairly widespread and robust homeless support services program without the limitation in the service area of the CDBG-DR program.

H. 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 government, 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.

1. 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.

I. 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 the 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.

IV. 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, 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 2015:

- 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.

This Action Plan will be used by the GLO to provide the approximate \$74,568,000 in CDBG-DR funds to be used toward meeting unmet housing, infrastructure, and other eligible community, and economic revitalization needs associated with DR-4223 and DR-4245.

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 re-allocation 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, infrastructure and economic revitalization in the impacted and distressed Texas counties as declared in DR-4223 and DR-4245.

As required by the Federal Register, Vol. 81, No. 117, Friday, June 17, 2016, and Federal Register, Vol. 82, No. 150, Monday, August 7, 2017 the GLO allocates a minimum of \$34,740,000 of the overall grant to the HUD-identified “most impacted” area consisting of Harris, Hays, Hidalgo, and Travis Counties.

The GLO will ensure, as is required by the Federal Register, the proportionate allocation of resources relative to areas and categories of greatest need. The GLO initially allocated for non-housing 68 percent and housing 32 percent based on the unmet need identified in the needs assessments. The GLO may adjust the percentage allocated to non-housing and housing based on current unmet recovery needs.

The GLO will ensure, as is required and identified in the Federal Register, at least 70 percent or \$35,487,200 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 5 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.

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-4223, DR-4245). 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 and maximum allocation size is the total allocated to the county.

- State Competition

The grant size established for this Action Plan for the State Competition for housing activities is a \$500,000 minimum project size and \$2,000,000 maximum project size. The application size established for this Action Plan for the State Competition for non-housing is a \$100,000 minimum project size and \$1,000,000 maximum project size. Each application may contain only one project. Each applicant can submit a total of three applications. No more than two may be non-housing.

Table 15: Minimum and Maximum Project Size

Project Size	Minimum	Maximum
HUD Most-Impacted Area Counties		
Harris	\$100,000	\$4,307,895
Hays	\$100,000	\$11,573,310
Hidalgo	\$100,000	\$6,740,560
Travis	\$100,000	\$8,644,235
State Competition		
Infrastructure	\$100,000	\$1,000,000
Housing	\$500,000	\$2,000,000

The proposed contract start dates for subrecipients is January/February 2018, and the proposed contract end dates for subrecipients is January/February 2022.

C. Eligibility and Award Method

According to HUD, only those that were within the disaster-declared counties of DR-4223 and DR-4245 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, and housing authorities located in the 116 impacted counties are eligible applicants.

Due to direct allocations from HUD, the City of Houston (including the Houston Housing Authority) and the City of San Marcos (including the San Marcos Housing Authority) are ineligible to receive funding from the State’s allocation in both the county MODs and the State Competition.

2. Eligible Activities

Housing Activities: Housing activities allowed under CDBG-DR including 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;
- 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;
- Planning activities related to non-housing;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities); and
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

3. Ineligible Activities

Ineligible activities identified in the Federal Register, Vol. 81, No. 117, Friday, June 17, 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. 117 are eligible.

D. Method of Distribution

As required by the Federal Register, Vol. 81, No. 117, Friday, June 17, 2016, and Federal Register, Vol. 82, No. 150, Monday, August 7, 2017, the GLO will allocate \$22,228,800 of the overall grant to the HUD-identified “most impacted” area. The HUD-identified “most impacted” area consists of Harris, Hays, Hidalgo, and Travis Counties. The GLO will meet the requirement by allocating \$20,005,920 (excluding 5 percent administration and 5 percent planning, and

project delivery) to Harris, Hays, Hidalgo, and Travis Counties. The GLO will require each “most-impacted” county to submit to the GLO a county Method of Distribution (MOD).

The amount each “most impacted” area county is allocated is based on the housing and non-housing funding allocation in the Need Assessment section of this Action Plan.

The balance, \$25,620,480 (excluding 5 percent administration and 5 percent planning, and project delivery), will be allocated for a State Competition for housing and non-housing projects. The GLO will release an application for eligible entities to apply.

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

The specific distribution of funds for general non-housing and housing activities have been determined by the four locally adopted county MODs. The four HUD identified most-impacted counties Harris, Hays, Hidalgo, and Travis developed MODs for their county’s allocation.

Each most-impacted county, including eligible cities (excluding the cities of Houston and San Marcos) and public housing authorities (excluding the Houston and San Marcos Housing Authorities) within the most-impacted counties, were eligible to be allocated funds with the MOD.

Harris, Hays, Hidalgo and Travis counties facilitated the Method of Distribution process. Cities and housing authorities located with the “most impacted” counties were encouraged to participate in the development of the MOD.

Each “most impacted” county MOD criteria included 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;
- Must allocate 68 percent of the funds to infrastructure activities and 32 percent of the funds housing activities. If reasonable justification is provided, a county MOD amendment may adjust the percentage allocated to non-housing and housing;
- Minimum grant size of \$100,000 and maximum grant size of the total amount allocated to the county;
- Identify the process of reallocation of funds from de-obligated funds and/or cost-savings from completed projects; and
- Must conduct at least one public planning meeting and one public hearing.

The GLO provided the counties additional guidance on the development of the county MODs. Due to the second allocation, each county will be required to amend its MOD and post the MOD for public comment.

Table 16: Most-Impacted Counties MODs (Updated APA 4)

Most-Impacted Entities	Housing	Infrastructure	Total
Harris County	\$523,527	\$3,784,368	\$4,307,895
Harris County	\$523,527	\$2,722,000.99	\$3,245,527.99
Bellaire		\$252,033.84	\$252,033.84
La Porte		\$325,775.30	\$325,775.30
Pasadena		\$484,557.87	\$484,557.87
Hays County	\$3,703,459	\$7,869,851	\$11,573,310
Hays County	\$2,349,747	\$5,003,006	\$7,352,753
Buda		\$430,377	\$430,377
Kyle		\$1,847,862	\$1,847,862
Uhland		\$277,388	\$277,388
Wimberley	\$1,353,712	\$311,217	\$1,664,929
Hidalgo County	\$2,156,979	\$4,583,581	\$6,740,560
Hidalgo County	\$2,156,979	\$4,583,581	\$6,740,560
Travis County	\$2,766,155	\$5,878,080	\$8,644,235
Austin	\$1,399,581	\$4,860,509	\$6,260,090
Travis County	\$1,366,574	\$1,017,571	\$2,384,145

The GLO may adjust the percentage allocated to non-housing and housing based on current unmet recovery needs. APA 4 adjusts the housing and infrastructure split for Harris County due to Harris County MOD Amendment 3. The other three Counties maintain the 68% infrastructure and 32% housing split.

2. State Competition

The GLO will conduct a State housing and non-housing competition for entities located in the remaining 112 impacted counties that were not identified by HUD as a most-impacted area county. Eligible applicants will include counties, cities, and housing authorities located in the 112 impacted counties. Counties, cities, and housing authorities located in the most-impacted counties are ineligible to apply to the State housing and non-housing competition.

Eligible applicants will submit applications for housing and/or non-housing projects to GLO based upon application guidelines developed by the GLO.

At a minimum the State Competition will include the following:

- Established objective scoring criteria for housing and non-housing projects;
- All CDBG-DR activities will be eligible;
- The State must meet the 70 percent low-to-moderate income benefit requirement;
- Will allocate \$17,421,926 or 68 percent of the funds to the non-housing competition and \$8,198,554 or 32 percent of the funds to the housing competition;
- For the housing competition, the minimum application amount is \$500,000 and the maximum application amount is \$2 million;
- For the non-housing competition, the minimum application amount is \$100,000 and the maximum application amount is \$1 million;
- One project per application submission;
- Eligible applicants may submit a maximum of 3 applications, only 2 may be non-housing; and
- Any de-obligated funds and/or cost-savings from completed projects will be allocated to partially funded applications and/or awarded to the next highest scoring unfunded application.

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.

a. Non-Housing Scoring Criteria

1. What is the applicant's rate of FEMA Public Assistance (PA) per capita?	10 points
2. What is the project's low-to-moderate income (LMI) percentage?	40 points
3. What is the change in employment from the 1st Quarter 2015 to the 1st Quarter 2016 for the applicant's county?	15 points
4. Was the applicant included in one or both of the DR-4223 and DR-4245 Presidential Disaster Declarations?	15 points
5. Is the applicant leveraging funds from other source(s)?	5 points
6. Project cost per beneficiary?	15 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-4223 and/or DR-4245 for the applicant, as of 7/8/2016, 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-4223" and/or "DR-4245" 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 on behalf of another entity within the county, and that entity is listed as receiving FEMA PA, the county amount and the entity amount will be combined. For example, the County A applies on behalf of County A Volunteer Fire Department (VFD), County A and County A VFD FEMA PA projected project amounts are 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-4223" and/or "DR-4245" 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-4223" and/or "DR-4245" 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-4223” and/or “DR-4245” 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.

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. What is the project’s low-to-moderate income (LMI) percentage?

Data Source: HUD 2016 LOWMOD Income Data, Surveys Utilizing Approved Methods and/or Non-housing Project Application Table 1

Maximum 40 Points

Methodology: Project beneficiary information will be reviewed to determine the appropriate LMI point score. The LMI percentage for applications are then awarded based upon the following scale:

- Below < 50.99% = 0 Points
- 51.00% to 59.99% = 20 Points
- 60.00% to 69.99% = 25 Points
- 70.00% to 79.99% = 30 Points
- 80.00% to 89.99% = 35 Points
- 90.00% to 100% = 40 Points

3. What is the change in employment from the 1st Quarter 2015 to the 1st Quarter 2016 for the applicant’s county?

Data Source: Texas Workforce Commission's (TWC) Quarterly Census of Employment and Wages (QCEW) for the 1st Quarter of 2015 and the 1st Quarter of 2016 Change in Employment Data Worksheet.

Maximum 15 Points

Methodology: Employment figures for all industries, both public and private, for the 1st Quarter of 2015 and the 1st Quarter of 2016 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 2015 to the 1st Quarter of 2016 is then calculated.

$$[(Q1\ 2016 - Q1\ 2015)/(Q1\ 2015)] \times 100 = \% \text{ Increase or Decrease}$$

Points are then awarded based upon the following scale:

- No decrease = 0 points
- Decrease up to 1.99% = 3 points
- Decrease 2.00% to 2.99% = 6 points
- Decrease 3.00% to 3.99% = 9 points
- Decrease 4.00% to 5.99% = 12 points
- Decrease 6.00% and over = 15 points

4. Was the applicant included in one or both of the DR-4223 and DR-4245 Presidential Disaster Declarations?

Data Source: FEMA Disaster Declarations Maps and Lists

Maximum 15 Points

Methodology: Applicant is located within a county that received Presidential Disaster Declarations DR-4223 and DR-4245.

- DR-4223 Only = 5 Points
- DR-4245 Only = 5 Points
- DR-4223 and DR-4245 = 15 Points

5. Is the applicant leveraging funds from other source(s)?

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. To calculate the leverage minimum, the following formula will be used: $\text{Leveraged Funds/CDBG-DR Funds Requested} = \text{Percent Leveraged}$.

6. What is the project cost per beneficiary?

Data Source: Non-housing Application Table 1

Maximum 15 points

Methodology: The project cost per beneficiary is calculated by dividing the applicant's total CDBG-DR application request and the total project's beneficiaries.

$\text{Cost per Beneficiary} = \text{Total CDBG-DR Request Amount/Total Project Beneficiaries} = \text{Points Awarded}$ (to two decimal places)

- Over \$10,000.01 per beneficiary = 0 points
- \$5,000.01 to \$10,000.00 per beneficiary = 3 points
- \$1,500.01 to \$5,000.00 per beneficiary = 6 points
- \$500.01 to \$1,500.00 per beneficiary = 9 points
- \$100.01 to \$500.00 per beneficiary = 12 points
- Under \$100.00 per beneficiary = 15 points

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

Data Source: 2014 ACS 5-year Table B17001

Methodology: Poverty rate is determined by reviewing the U.S. Census 2014 American Communities Survey (ACS) 5-year estimate, table B17001 for the census geographic area. Once this information is obtained from each applicant and the target

area is 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.

b. Housing Scoring Criteria

a. What is the applicant’s rate of FEMA Public Assistance (PA) per capita?	10 points
b. Is the applicant a public housing authority?	10 points
a. Will the beneficiaries served through the applicant’s proposed eligible housing activities be 100% low-to-moderate income?	30 points
b. What is the change in employment from the 1st Quarter 2015 to the 1st Quarter 2016 for the applicant’s county?	15 points
c. Was the applicant included in one or both of the DR-4223 and DR-4245 Presidential Disaster Declarations?	15 points
d. What is the project cost per housing unit?	15 points
7. Is the applicant leveraging funds from other source(s)?	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-4223 and/or DR-4245 for the applicant, as of 7/8/2016, 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-4223" and/or "DR-4245" 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-4223" and/or "DR-4245" 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-4223" and/or "DR-4245" 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-4223” and/or “DR-4245” 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.

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. Is the applicant a public housing authority?

Data Source: Housing Application, 424 Form

Maximum 10 Points

Yes = 10 points

No = 0 points

3. Will the beneficiaries served through the applicant’s proposed eligible housing activities be 100 percent low-to-moderate income?

Data Source: Housing Application, Table 1

Maximum 30 Points

Methodology: The applicant identifies the proposed total of housing units to be served and the proposed total of low-to-moderate income housing units to be served in Table 1 of the application.

Yes = 30 points

No = 0 points

4. What is the change in employment from the 1st Quarter 2015 to the 1st Quarter 2016 for the applicant's county?

Data Source: Texas Workforce Commission's (TWC) Quarterly Census of Employment and Wages (QCEW) for the 1st Quarter of 2015 and the 1st Quarter of 2016 Change in Employment Data Worksheet.

Maximum 15 Points

Methodology: Employment figures for all industries, both public and private, for the 1st Quarter of 2015 and the 1st Quarter of 2016 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 2015 to the 1st Quarter of 2016 is then calculated.

$$[(Q1\ 2016 - Q1\ 2015)/(Q1\ 2015)] \times 100 = \% \text{ Increase or Decrease}$$

Points are then awarded based upon the following scale:

- No decrease = 0 points
- Decrease up to 1.99% = 3 points
- Decrease 2.00% to 2.99% = 6 points
- Decrease 3.00% to 3.99% = 9 points
- Decrease 4.00% to 5.99% = 12 points
- Decrease 6.00% and over = 15 points

5. Was the applicant included in one or both of the DR-4223 and DR-4245 Presidential Disaster Declarations?

Data Source: FEMA Disaster Declarations Maps and Lists

Maximum 15 Points

Methodology: Applicant is located within a county that received Presidential Disaster Declarations DR-4223 and DR-4245.

- DR-4223 Only = 5 Points
- DR-4245 Only = 5 Points
- DR-4223 and DR-4245 = 15 Points

6. What is the cost per housing unit?

Data Source: Housing Application, Table 1

Maximum 15 Points

Methodology: The cost per housing unit is calculated by dividing the applicant's total CDBG-DR application request and the total amount of housing units projected to be served by the project.

Cost per Beneficiary = Total CDBG-DR Request Amount/Total Proposed Number of Housing Units = Points Awarded (to two decimal places)

- Over \$250,000.00 per unit = 0 points
- \$200,000.00 to \$249,999.99 per unit = 5 points
- \$100,000.00 to \$199,999.99 per unit = 10 points
- Under \$99,999.99 per unit = 15 points

7. Is the applicant leveraging funds from other source(s)?

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 5 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. To calculate the leverage minimum, the following formula will be used: Leveraged Funds/CDBG-DR Funds Requested = Percent Leveraged

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

Data Source: 2014 ACS 5-year Table B17001

Methodology: Poverty rate is determined by reviewing the U.S. Census 2014 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. Location

All CDBG-DR funded activities under this Action Plan will occur within the disaster-declared counties of FEMA DR-4223 and DR-4245, excluding the cities of Houston and San Marcos.

F. Mitigation Measures

The GLO will encourage subgrantees to incorporate preparedness and mitigation measures into rebuilding activities, which help to ensure that communities recover to be 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, and restoration of infrastructure, housing, or economic revitalization that responds to declared disaster FEMA DR-4223 and DR-4245.

G. Use of Urgent Need

Each subgrantee receiving 2015 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 subgrantee. 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.

H. Citizen Participation

The citizen participation plan for the 2015 Floods allocation as required by the Federal Register, Vol. 81, No. 117, Friday, June 17, 2016, will provide a reasonable opportunity of at least 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 recovery.texas.gov. recovery.texas.gov is 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 subgrantees and 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:

Address: 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

1. Public Website

The GLO will make the following items available on its website: (1) the Action Plan (including all amendments); each QPR (as created using the 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 four HUD identified “most-impacted” area counties and conducted outreach for the other 112 impacted counties. The GLO consultation and outreach included the following:

- 2015 - Created a website page for all information related to 2015 Storms and Floods. The web page is accessible from TexasRebuilds.org.
- April 2016 - The GLO sent a letter to all eligible cities, counties, and councils of government located in the 116 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 survey closed for submission August 31, 2016. The GLO has received 167 completed surveys.
- June 2016 – The GLO presented to the Texas Association of Regional Councils regarding the allocation.
- July 2016 – The GLO conducted outreach to all impacted Councils of Government Executive Directors through telephone and/or email. Twenty-three of the twenty-four COGs of Texas were impacted by these disasters.
- July/August 2016 – The GLO consulted with the HUD identified four “most-impacted” counties. This included the counties and the cities located within the impacted counties.
- July/August 2016 - The GLO presented to the impacted councils of governments. The councils included Capital Area Council of Governments, Deep East Texas Council of Government, Houston-Galveston Area Council, Lower Rio Grande Valley Development Council, South East Texas Regional Planning Commission, Texoma Council of Governments, and West Central Texas Council of Governments.
- September/October 2016 – The GLO met with the HUD identified four “most-impacted” counties for the development of the county method of distributions.

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 5 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.

I. Performance and Expenditure Schedule

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

The Projected Expenditures are based on actual expenditures through September 30, 2020 (Q3 2020).

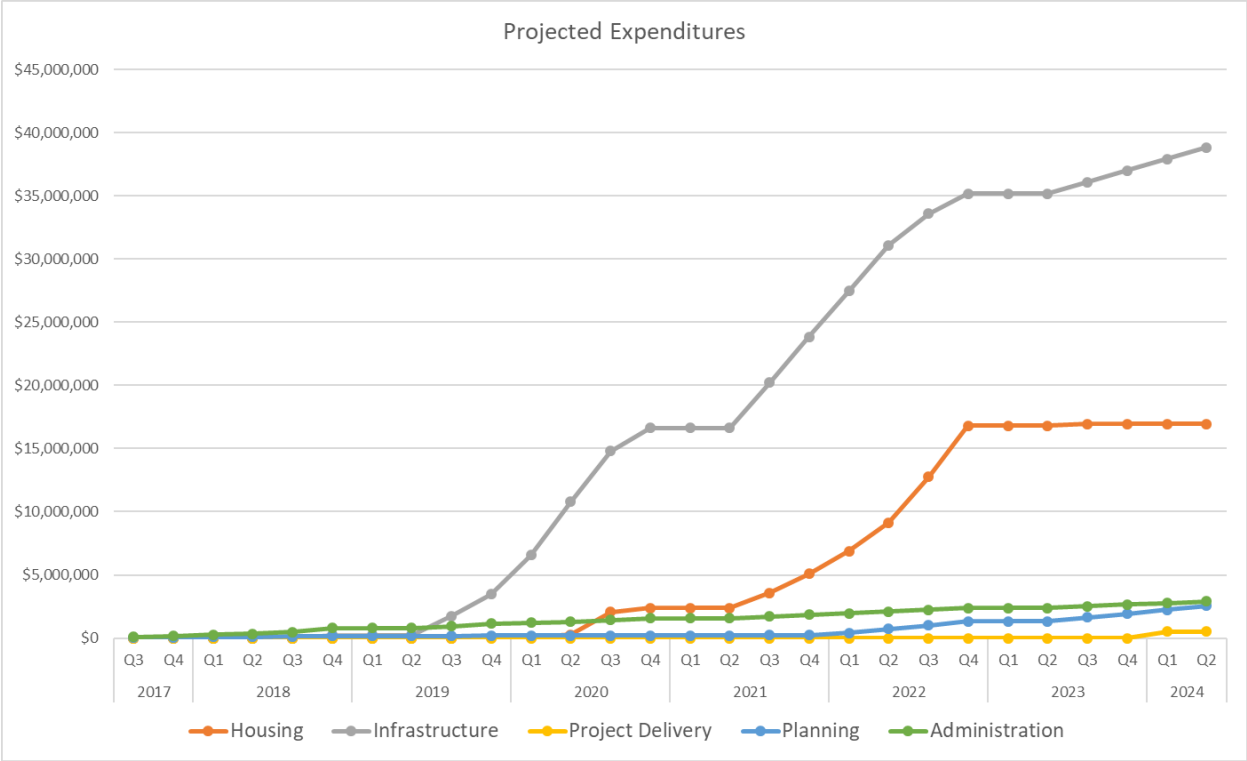
Figure 5: Projected Expenditures

Program	Allocation	2017				2018			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	21,475,584	-	-	-	-	-	-	-	-
Infrastructure	45,635,616	-	-	-	-	-	-	-	249,113
Project Delivery	534,800	-	-	-	-	-	-	-	-
Planning	3,193,600	-	-	13,320	13,121	55,934	263	44,692	21,099
Administration	3,728,400	-	-	108,806	68,927	103,155	49,217	163,103	309,529
Grand Total	74,568,000	-	-	122,126	82,048	159,089	49,480	207,795	579,741

Program	Allocation	2019				2020			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	21,475,584	-	25,000	-	42,176	26,237	204,061	1,801,849	300,000
Infrastructure	45,635,616	815,807	769,168	1,494,374	1,716,092	3,124,983	4,205,809	3,995,980	1,827,081
Project Delivery	534,800	-	-	-	-	-	-	-	-
Planning	3,193,600	15,145	-	236	42,775	322	6,131	1,634	10,000
Administration	3,728,400	155,851	114,451	135,984	206,456	73,827	67,691	152,116	134,619
Grand Total	74,568,000	986,803	908,619	1,630,594	2,007,499	3,225,369	4,483,692	5,951,579	2,271,700

Program	Allocation	2021				2022			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	21,475,584	500,000	750,000	1,200,000	1,500,000	1,808,871	2,261,089	3,617,742	4,050,292
Infrastructure	45,635,616	1,827,081	1,827,081	3,621,174	3,621,174	3,621,174	3,621,174	2,486,135	1,572,595
Project Delivery	534,800	-	-	-	-	-	-	-	-
Planning	3,193,600	10,000	10,000	10,000	10,000	179,148	305,531	305,531	305,531
Administration	3,728,400	134,619	134,619	134,619	134,619	134,619	134,619	134,619	134,619
Grand Total	74,568,000	2,471,700	2,721,700	4,965,794	5,265,794	5,743,813	6,322,414	6,544,028	6,063,036

Program	Allocation	2023				2024			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Housing	21,475,584	2,009,857	401,971	121,439	-	-	-	-	-
Infrastructure	45,635,616	1,344,210	1,096,249	913,540	913,540	913,540	913,540	-	-
Project Delivery	534,800	-	-	-	-	534,800	-	-	-
Planning	3,193,600	305,531	305,531	305,531	305,531	305,531	305,531	-	-
Administration	3,728,400	134,619	134,619	134,619	134,619	134,619	134,619	-	-
Grand Total	74,568,000	3,794,217	1,938,370	1,475,129	1,353,691	1,888,491	1,353,691	-	-



V. Appendix A – Eligible Counties

COUNTY	MOST IMPACTED	DR-4223	DR-4223 Assistance Type	DR-4245	DR-4245 Assistance Type
Angelina	N	Y	Individual Assistance/Public Assistance	N	N/A
Archer	N	Y	Public Assistance	N	N/A
Atascosa	N	Y	Public Assistance	N	N/A
Austin	N	Y	Public Assistance	N	N/A
Bastrop	N	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Baylor	N	Y	Public Assistance	N	N/A
Blanco	N	Y	Individual Assistance/Public Assistance	N	N/A
Bosque	N	Y	Public Assistance	Y	Public Assistance
Bowie	N	Y	Individual Assistance/Public Assistance	N	N/A
Brazoria	N	Y	Individual Assistance/Public Assistance	Y	Individual Assistance
Brown	N	Y	Public Assistance	N	N/A
Burleson	N	Y	Public Assistance	N	N/A
Caldwell	N	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Callahan	N	Y	Public Assistance	N	N/A
Cameron	N	N	N/A	Y	Individual Assistance
Cass	N	Y	Public Assistance	N	N/A
Cherokee	N	Y	Individual Assistance/Public Assistance	N	N/A
Clay	N	Y	Public Assistance	N	N/A
Collingsworth	N	Y	Public Assistance	N	N/A
Colorado	N	Y	Public Assistance	N	N/A
Comal	N	Y	Public Assistance	Y	Individual Assistance/Public Assistance
Comanche	N	Y	Public Assistance	N	N/A

Cooke	N	Y	Individual Assistance/Public Assistance	N	N/A
Coryell	N	Y	Public Assistance	N	N/A
Dallas	N	Y	Individual Assistance/Public Assistance	N	N/A
Delta	N	Y	Public Assistance	N	N/A
Denton	N	Y	Individual Assistance/Public Assistance	N	N/A
DeWitt	N	Y	Public Assistance	N	N/A
Dickens	N	Y	Public Assistance	N	N/A
Duval	N	Y	Public Assistance	N	N/A
Eastland	N	Y	Individual Assistance/Public Assistance	N	N/A
Edwards	N	Y	Public Assistance	N	N/A
Ellis	N	Y	Individual Assistance/Public Assistance	N	N/A
Erath	N	Y	Individual Assistance/Public Assistance	N	N/A
Fannin	N	Y	Individual Assistance/Public Assistance	N	N/A
Fayette	N	Y	Individual Assistance/Public Assistance	N	N/A
Fort Bend	N	Y	Individual Assistance	N	N/A
Frio	N	Y	Individual Assistance/Public Assistance	N	N/A
Gaines	N	Y	Individual Assistance/Public Assistance	N	N/A
Galveston	N	N	N/A	Y	Individual Assistance
Garza	N	Y	Public Assistance	N	N/A
Gillespie	N	Y	Public Assistance	N	N/A
Gonzales	N	Y	Public Assistance	N	N/A
Grayson	N	Y	Individual Assistance/Public Assistance	N	N/A
Grimes	N	Y	Public Assistance	N	N/A

Guadalupe	N	Y	Individual Assistance	Y	Individual Assistance/Public Assistance
Hall	N	Y	Public Assistance	N	N/A
Hardin	N	Y	Public Assistance	Y	Individual Assistance
Harris	Y	Y	Individual Assistance/Public Assistance	Y	Individual Assistance
Harrison	N	Y	Individual Assistance/Public Assistance	N	N/A
Hartley	N	Y	Public Assistance	N	N/A
Hays	Y	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Henderson	N	Y	Individual Assistance/Public Assistance	N	N/A
Hidalgo	Y	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Hill	N	Y	Public Assistance	Y	Public Assistance
Hood	N	Y	Individual Assistance/Public Assistance	N	N/A
Hopkins	N	Y	Public Assistance	N	N/A
Houston	N	Y	Public Assistance	N	N/A
Jack	N	Y	Public Assistance	N	N/A
Jasper	N	Y	Public Assistance	Y	Public Assistance
Jim Wells	N	Y	Individual Assistance/Public Assistance	N	N/A
Johnson	N	Y	Individual Assistance/Public Assistance	N	N/A
Jones	N	Y	Public Assistance	N	N/A
Kaufman	N	Y	Public Assistance	N	N/A
Kendall	N	Y	Public Assistance	N	N/A
Lamar	N	Y	Public Assistance	N	N/A
Lee	N	Y	Public Assistance	N	N/A
Leon	N	Y	Public Assistance	N	N/A
Liberty	N	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Lubbock	N	Y	Public Assistance	N	N/A

Lynn	N	Y	Public Assistance	N	N/A
Madison	N	Y	Individual Assistance/Public Assistance	N	N/A
McLennan	N	Y	Public Assistance	N	N/A
Milam	N	Y	Individual Assistance/Public Assistance	N	N/A
Montague	N	Y	Individual Assistance/Public Assistance	N	N/A
Montgomery	N	Y	Individual Assistance	N	N/A
Nacogdoches	N	Y	Public Assistance	N	N/A
Navarro	N	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Newton	N	Y	Public Assistance	Y	Public Assistance
Nueces	N	Y	Individual Assistance/Public Assistance	N	N/A
Orange	N	Y	Public Assistance	N	N/A
Palo Pinto	N	Y	Public Assistance	N	N/A
Parker	N	Y	Public Assistance	N	N/A
Polk	N	Y	Public Assistance	N	N/A
Real	N	Y	Public Assistance	N	N/A
Red River	N	Y	Individual Assistance/Public Assistance	N	N/A
Refugio	N	Y	Public Assistance	N	N/A
Robertson	N	Y	Public Assistance	N	N/A
Rusk	N	Y	Individual Assistance/Public Assistance	N	N/A
Sabine	N	Y	Public Assistance	N	N/A
San Augustine	N	Y	Public Assistance	N	N/A
San Jacinto	N	Y	Public Assistance	N	N/A
Shelby	N	Y	Individual Assistance/Public Assistance	N	N/A
Smith	N	Y	Individual Assistance/Public Assistance	Y	Public Assistance
Somervell	N	Y	Public Assistance	N	N/A
Starr	N	Y	Public Assistance	N	N/A
Tarrant	N	Y	Public Assistance	N	N/A

Throckmorton	N	Y	Public Assistance	N	N/A
Tom Green	N	Y	Public Assistance	N	N/A
Travis	Y	Y	Individual Assistance/Public Assistance	Y	Individual Assistance/Public Assistance
Trinity	N	Y	Individual Assistance/Public Assistance	N	N/A
Tyler	N	Y	Public Assistance	N	N/A
Uvalde	N	Y	Public Assistance	N	N/A
Van Zandt	N	Y	Individual Assistance/Public Assistance	N	N/A
Victoria	N	Y	Public Assistance	N	N/A
Walker	N	Y	Individual Assistance/Public Assistance	Y	Public Assistance
Waller	N	Y	Public Assistance	N	N/A
Washington	N	Y	Public Assistance	N	N/A
Wharton	N	Y	Individual Assistance/Public Assistance	N	N/A
Wichita	N	Y	Individual Assistance/Public Assistance	N	N/A
Willacy	N	N	N/A	Y	Individual Assistance/Public Assistance
Williamson	N	Y	Individual Assistance/Public Assistance	N	N/A
Wilson	N	Y	Public Assistance	Y	Individual Assistance/Public Assistance
Wise	N	Y	Individual Assistance/Public Assistance	N	N/A
Young	N	Y	Public Assistance	N	N/A
Zavala	N	Y	Public Assistance	N	N/A

VI. Appendix B – Certifications

Sections 91.225 and 91.325 of title 24 of the Code of Federal Regulations are waived. Each State or UGLG 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-DR 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 funding, 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 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*) related to

the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.

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. Each State or UGLG receiving a direct award under this notice 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 Public Law 114–113 applicable to funds allocated by this notice, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a

comprehensive disaster recovery Web site to ensure timely communication of application status to applicants for disaster recovery assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.

- l. 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.
- m. 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.
- n. The grantee certifies that it will comply with applicable laws.

VII. Appendix C – Response to Public Comment

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 October 23, 2017. The public comment period for the document ran to November 6, 2017. An email notification of the public comment period was sent to low-income housing advocates and community organizations representing homeless and special needs populations, as well as all mayors, county judges, and tribal leaders in the declared areas. The Amendment was available in English and Spanish.

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 February 27, 2017. The public comment period for the document ran from February 27 to March 13, 2017. The GLO distributed a Statewide press release announcing the availability of the Amendment on the TexasRebuilds.org website. The Amendment was available in English and Spanish.

The following are the comments received and the commenter as well as the response:

Comment #1: In Favor of Competitive Scoring

Thank you for the opportunity to make comments regarding the State of Texas Plan for Disaster Recovery. The City of Raymondville experienced damage and other impacts to our housing and infrastructure during the 2015 storms. I am in favor of the competitive scoring that GLO proposes.

The scoring evaluates the local level of damage as well as local need in terms of low-to-moderate income benefit and cost per beneficiary, which is important in determining a community's ability to recover from the disaster. I ask that you make no further changes to the scoring.

We appreciate your consideration of these comments and look forward to working with GLO as the Disaster Recovery program moves forward.

Commenter:

Gilbert Gonzales Mayor
City of Raymondville 142
South 7th Street
Raymondville, TX 78580

Staff Response:

The team has received your letter and we greatly appreciate your input on the scoring criteria for the competition described in the *State of Texas Plan for Disaster Recovery, Amendment No. 1*.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #2: Lower Minimum Contract Amount

I appreciate that the GLO is accepting comments regarding Amendment 1 to the 2015

CDBG- Disaster Recovery Action Plan. Willacy County experienced infrastructure failures and housing damage and losses that it hopes to address through the 2015 CDBG-DR program. The County supports the amendment language, including the scoring system. In particular the scoring system balances storm impact with important considerations including the low-to- moderate income level and the cost per beneficiary for proposed projects.

I ask that you consider setting a lower minimum contract amount for planning projects under the infrastructure and housing competitions since \$100,000 may be excessive to meet the planning needs for smaller rural counties and cities.

Thank you for the opportunity to comment.

Commenter:

Aurelio Guerra
Judge
Willacy County 576
West Main
Raymondville, TX 78580

Staff Response:

The team has received your letter and we greatly appreciate your input on the *State of Texas Plan for Disaster Recovery, Amendment No. 1*. The project size minimums and maximums were chosen in order to maximize the impact of the funding. Further, we considered administrative, environmental, and engineering expenses that must be included for viable projects.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #3: Lower Minimum Contract Amount

I appreciate that the GLO is accepting comments regarding Amendment 1 to the 2015 CDBG- Disaster Recovery Action Plan. Willacy County experienced infrastructure failures and housing damage and losses that it hopes to address through the 2015 CDBG-DR program.

The County supports the amendment language, including the scoring system. In particular the scoring system balances storm impact with important considerations including the low-to- moderate income level and the cost per beneficiary for proposed projects.

I ask that you consider setting a lower minimum contract amount for planning projects under the infrastructure and housing competitions since \$100,000 may be excessive to meet the planning needs for smaller rural counties and cities.

Thank you for the opportunity to comment.

Commenter:

Eduardo Gonzales
Commissioner, Precinct
4 Willacy County
576 West Main, Room 145
Raymondville, TX 78580

Staff Response:

The team has received your letter and we greatly appreciate your input on the *State of Texas Plan for Disaster Recovery, Amendment No. 1*. The project size minimums and maximums were chosen in order to maximize the impact of the funding. Further, we considered administrative, environmental, and engineering expenses that must be included for viable projects.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #4: Lower Minimum Contract Amount

Thank you for giving us the opportunity to comment regarding the General Land Office's proposed Amendment 1 to the 2015 CDBG-DR Action Plan. Jim Wells County's infrastructure and housing were affected by the disaster events so we are pleased that assistance will be available.

I support the amendment as proposed by the GLO, which include a scoring system that prioritizes funding for communities that both experienced impact and are less equipped for recovery due to lower incomes. I am especially in favor of keeping in place the 10 point scale for per capita Public Assistance and the 30 point scale for low-to-moderate income percentage.

This will allow us to target low income neighborhoods and colonias, where CDBG funds have the greatest impact.

The only change we suggest is to allow a lower project minimum such as \$30,000 for planning projects under the non-housing and housing competitions.

Thank you for considering my comments.

Commenter:

Pedro “Pete” Trevino, Jr.
Judge
Jim Wells County
200 N. Almond Street, Room 101
Alice, TX 78332

Staff Response:

The team has received your letter and we greatly appreciate your input on the *State of Texas Plan for Disaster Recovery, Amendment No. 1*. The project size minimums and maximums were chosen in order to maximize the impact of the funding. Further, we considered administrative, environmental, and engineering expenses that must be included for viable projects.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #5: Support for Amendment Without Any Changes

Portions of Duval County were affected by the 2015 storms so I appreciate the opportunity to express my support for the GLO's proposed Action Plan Amendment. I believe the Amendment should be accepted without any changes.

Thank you for considering my comments.

Commenter:

Ricardo O. Carrillo
Judge
Duval County
P.O. Drawer 189
San Diego, TX 78384

Staff Response:

The team has received your letter and we greatly appreciate your input on the scoring criteria for the competition described in *The State of Texas Plan for Disaster Recovery, Amendment No. 1*.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the

communities eligible to apply.

Comment #6: Scoring Criteria

The City of Normangee experienced damages from the 2015 disaster event and is interested in participating in the funding competition. We agree with the scoring proposed in Amendment One to the CDBG-DR Action Plan, though we ask you to consider the following adjustments:

- 1) Reduce the points for being declared under both disasters to 10 points from 15 points.
- 2) Add 5 points to the per capita Public Assistance scoring factor.

Thank you for considering our comments, please let me know if I can be of any assistance.

Commenter:

Gary Dawkins
Mayor
City of Normangee
100 Main Street
Normangee, TX 77871

Staff Response:

The team has received your letter and we greatly appreciate your input on the scoring criteria for the competition described in the *State of Texas Plan for Disaster Recovery, Amendment No. 1*. We carefully weighed many factors in determining the scoring criteria and chose six categories we expect to produce an equitable competition.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #7: Scoring Criteria

The City of Buffalo has damage and other impacts from the 2015 storms that we would like to address, so we appreciate the opportunity to make comments. We support the Amendment language overall, and suggest that GLO consider reducing the points for being declared under both disasters by five and increasing the per capita Public Assistance scoring factor by five points.

We feel a small impact from two disasters should not outweigh a large impact from one, so this adjustment would equalize that imbalance. We appreciate your consideration of our comments.

Commenter:

Royce Dawkins
Mayor
City of Buffalo 144
Avant Street
Buffalo, TX 75831

Staff Response:

The team has received your letter and we greatly appreciate your input on the scoring criteria for the competition described in the *State of Texas Plan for Disaster Recovery, Amendment No. 1*. We carefully weighed many factors in determining the scoring criteria and chose six categories we expect to produce an equitable competition.

Your comments will be included with the *Amendment* when it is submitted to the United States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

Comment #8: Scoring Factors are Appropriate and Fair

I appreciate the chance to make comments related to the General Land Office's proposed Amendment 1 to the CDBG-DR Action Plan. The City of Premont needs the assistance to help recover from impacts to our public infrastructure and housing stock. I agree with the contents of the GLO's amendment and would prefer no changes be made to the final version. I especially agree that the scoring factors are appropriate and fair.

The City looks forward to participating in the 2015 CDBG-DR program. Please let me know if you have any questions and thank you for your consideration.

Commenter:

Norma Tullos
Mayor
City of Premont
P.O. Drawer 340
Premont, TX 78375

Staff Response:

The team has received your letter and we greatly appreciate your input on the *State of Texas Plan for Disaster Recovery, Amendment No. 1*.

Your comments will be included with the *Amendment* when it is submitted to the United

States Department of Housing and Urban Development for review and approval. Once the *Amendment* is approved and the application for the competition is ready, we will notify the communities eligible to apply.

State of Texas Plan for Disaster Recovery

The *State of Texas Plan for Disaster Recovery* was released on September 1, 2016. The public comment period for the document ran from September 1 to 16, 2016. The GLO distributed a Statewide press release announcing the availability of the *Plan* on the TexasRebuilds.org website. The *Plan* was available in English and Spanish.

The following are the comments received and the commenter as well as the response:

Comment #1: The Needs of Collin County

I didn't see Collin County on the list of impacted counties. We received substantial amounts of rainfall that in just Celina required evacuations and damaged a bridge crossing that had to be shut down until we could make emergency repairs.

Commenter:

Gabe Johnson, PE, PH, CFM, GISP
Director of Engineering and Public
Works Public Works Offices, City of
Celina 10165 County Road 106
Celina, TX 75009

Staff Response:

The eligible counties all received Presidential Disaster Declarations.

Comment #2: Project Type

Page 12 discusses incorporating infrastructure resiliency solutions into the submitted projects. Page 29 gives the list of Non-Housing activities that will be considered. I would like to suggest that infrastructure capacity projects be added as an eligible activity as well.

The City of Arlington and, I'm sure, many other communities, have neighborhood flooding situations where inadequate public infrastructure is the cause of the flooding. Our Stormwater Capital Improvement Program includes a list of projects to enhance our infrastructure and several of the areas were impacted by the 2015 storms. The systems within the neighborhoods are in adequate condition, so don't fit within the "Restoration of Infrastructure" activity. I'd like to see that activity either expanded or an additional eligible activity added for capacity projects.

Commenter:

Mandy Clark, P.E., CFM
Assistant Director/Stormwater
Public Works and Transportation, City of Arlington
P.O. Box 90231
Arlington, TX 76004

Staff Response:

The list on page 29 of the Action Plan is not exhaustive, but rather a sample of potential activities. We anticipate that all projects which are eligible for the Community Development Block Grant-Disaster Recovery funding will be eligible in the State Competition.

Comment #3: Demographic Data at County Level

Thank you for the opportunity to provide comments on the State Action Plan Draft for the Texas 2015 Storms and Floods CDBG- DR Allocation.

With the Texas Low-Income Housing Information Service (TxLIHIS), Texas Appleseed has worked, for over 10 years, to ensure that low-income communities and communities of color have an equal opportunity to access disaster recovery programs. One of the legacies of segregation is that historically underserved populations—the poor, people of color, persons with disabilities—often live in areas most vulnerable to flooding and the other impacts of both natural and manmade disasters. They are also disproportionately negatively impacted by disasters, have a harder time recovering, and have historically been underserved by both short and long-term disaster recovery programs. 1

The CDBG-DR funds for recovery from the 2015 floods and storms present the State and the impacted areas with an opportunity to rebuild more resilient communities and reduce the damage from future disasters, and to do so in a way that addresses systemic issues that have left some communities more vulnerable. We applaud the State and the General Land Office’s commitment to “invest[ing] resources in efforts that mitigate damage from future disasters” and to developing programs “in a manner that considers an integrated approach to housing, infrastructure, economic revitalization and overall community recovery.” (AP at 11, 20)

I. Needs Assessment

Both the State’s use of objective data in its Needs Assessment and its inclusion of a resiliency factor in calculating unmet need are critical to an effective Action Plan. Also important is the State’s use of the NEMIS database figures, which include all applicants for FEMA individual assistance, instead of the FEMA website data which includes only approved applications.

Following Hurricanes Ike and Dolly in 2008, FEMA’s application of the so-called “deferred maintenance rule” was used to reject applications for home repair assistance in low-income neighborhoods and neighborhoods that were primarily African-American or Latino. While FEMA has been barred from using this rule by the federal courts, Texas’ experience after the 2008 hurricanes demonstrates that the accuracy of approved application data may reflect practices or policies that undercount damage and disproportionately undercount damage in low-income communities of color.²

However, federal guidance requires that the State assess and include in its Action Plan how its decisions “may affect racial, ethnic, and low-income concentrations, and ways to promote the availability of affordable housing for low poverty, nonminority areas where appropriate and in response to natural hazard – related impacts.” (81 FR 177:39692, 2016) It is difficult to see how the State will do this assessment without collecting and analyzing demographic data, including LMI data, which is not included in the Action Plan.

This impact analysis is essential to ensure that facially neutral policies do not have a completely unintended effect of impeding a fair assessment of loss and unmet need, and of equitable distribution of assistance. For example, in New Orleans, rebuilding assistance for homeowners was determined by the pre-storm value of homes, rather than the cost of repair, so that owners of identical houses in black and white neighborhoods received dramatically differing assistance given the low market value of homes in black neighborhoods because of a history of segregation and discrimination. In Texas, the state’s Hurricane Ike and Dolly Round One program and initial Round Two program³ required homeowners receiving disaster- recovery funds to rebuild on their pre-hurricane lot, which meant that families living in highly segregated, flood-prone, and distressed neighborhoods were denied the opportunity to rebuild on higher ground in higher opportunity communities. The State’s Amended Action Plan included a first of its kind nationally homeowner mobility program (HOP) that has successfully helped homeowners move to safer areas where they will be less vulnerable to future storm damage.

As the State recognizes in its Action Plan Draft and has carried out for Hurricane Ike and Dolly, buyouts and other programs that enable individuals to move out of high-risk areas are an essential element of resiliency and resistance to future disasters.

In addition to the requirements in the Federal Register Notice, on August 16, 2016, the United States Departments of Justice (DOJ), Homeland Security (DHS), Housing and Urban Development (HUD), Health and Human Services (HHS), and Transportation (DOT) issued guidance on Title VI of the Civil Rights Act for federally assisted recipients engaged in disaster preparedness, response, mitigation, and recovery (DOJ Guidance).⁴ While we recognize that this guidance is extremely new and that the State was engaged in the Needs Assessment and Action Plan process before it was issued, Section E provides additional guidance on collecting and analyzing data in order to ensure Title VI compliance and equitable recovery that will be helpful to the State in producing the complete impact and needs assessment and consideration of the civil rights implications of its planning decisions required by the Federal Register Notice.

Inherent in the reporting and civil rights requirements of the CDBG-DR program, and made explicit by DOJ's new guidance, is that the required impact and needs assessment must include, "information about the race, color, national origin, languages spoken by LEP populations, and other demographic information of communities served by a federally assisted program, activity, or service" and "identify, obtain, review, and share aggregate race, color, and national origin data concerning the extent and geographic distribution of damage caused by disasters and emergencies before formulating recovery and mitigation plans."⁵

We understand that the State has federally mandated deadlines for submitting the Action Plan Draft, and that decisions about specific programs and projects have been delegated to local jurisdictions, however, the State's own Action Plan must include this data "at the county level or lower if available."⁶ The State must add this data to its Needs Assessment as a substantial amendment and this kind of data and assessment must be a requirement for both Methods of Distribution and individual project applications.

As the formal recipient of CDBG-DR funds, the State must certify that it is in compliance with civil rights and fair housing requirements, including that its subrecipients are in compliance with those obligations. As the DOJ Guidance points out, "*[l]eadership and commitment to nondiscrimination matter.*" (italics in original)

Recipients who communicate this commitment internally in their departments, agencies, and organizations, as well as externally through training, policies, and outreach, will set the stage for improved Title VI compliance and more effective delivery of services. Robust information-sharing with affected or potentially affected communities is a practical way to reaffirm recipients' commitment to Title VI protections. It is also essential to advance effective emergency preparedness, response, mitigation, and recovery efforts. Information-sharing activities also present an important opportunity for recipients to explicitly inform beneficiaries of their nondiscrimination rights.⁷

Local subrecipients have been clear, including in testimony before interim legislative committees, that they want additional guidance and technical assistance on a number of issues related to disaster recovery. In our interviews with local jurisdictions and CDBG grant consultants regarding the FFAST process, more guidance on fair housing and civil rights requirements and implementation was the most common recommendation. The State has access to data, expertise in CDBG-DR programs, and specific knowledge about how fair housing and civil rights requirements can be implemented in a disaster recovery program. The State's leadership on these issues, including in its Action Plan and future planning and processes is important not only in and of itself, but to help local subrecipients efficiently plan and implement effective projects and programs.

II. Public Comment on Amendments to the draft Action Plan

HUD's approval of the action plan and obligation of funds requires grantees to meet the standards set out in the Federal Register Notice. ("The Secretary may disapprove an action

plan as substantially incomplete if it is determined that the plan does not satisfy all of the required

elements identified in this notice.” (81 FR 117: 39691, 2016) “All grantees must include sufficient information so that all interested parties will be able to understand and comment on the action plan.” (81 FR 117: 39693, 2016)

A State Action Plan that meets statutory and regulatory requirements will require one or more substantial amendments and associated public comment processes to the current draft.⁸ The State has, in the past structured its Action Plan in a similar way, amending the Plan to include Methods of Distribution (MOD) that contain the details of how funds will be allocated and used as they are approved by the State. The draft Action Plan should be explicit that specific amendments, including the MODs, changes to the Needs Assessment, and any change that identifies the use of funds in a more specific way, addresses public housing needs, or prioritize projects are substantial amendments and will be accompanied by a public comment process.

We appreciate the General Land Office’s experience and expertise in implementing disaster recovery programs and commitment to fair and effective recovery. We look forward to seeing subsequent iterations of the Action Plan when additional data and program details are added.

1 See, e.g., Thomas Gabe, Gene Falk, Maggie McCarty, and Virginia Mason, Hurricane Katrina: Social-Demographic Characteristics of Impacted Areas, Congressional Research Service Report to Congress (November 5, 2005); Alice Fothergill and Lori Peek, Poverty and Disasters in the United States: A Review of Recent Sociological Findings, *Natural Hazards* 32: 89–110, 2004; and, Shannon Van Zandt, Walter Gillis Peacock, Wesley E. Highland, and Samuel D. Brody, “Mapping social vulnerability to enhance housing and neighborhood resilience”, *Housing Policy Debate* 22(1):29-55 (January 2012).

2 See, e.g., *La Union del Pueblo Entero (LUPE) v. FEMA* (Case No. 1:08-cv-00487, Southern District, Texas) We also note that FEMA’s data collection is based on the structure of its own programs, which offer far more limited funding for renters than homeowners, because renters are not owners of the damaged structure. When that data is then used by other agencies to assess damage from a disaster, it can lead to an undercount of renters, who are disproportionately lower income, African-American and Latino in most of the country.

4 Guidance to State and Local Governments and Other Federally Assisted Recipients Engaged in Emergency Preparedness, Response, Mitigation, and Recovery Activities on Compliance with Title VI of the Civil Rights Act of 1964. Available: <https://www.justice.gov/crt/file/885401/download>

5 “Data can include the geographic distribution of individuals by race, color, and national origin (including Limited English Proficiency); the reliance of particular communities on public transit; the proximity of different groups to emergency or disaster danger zones; and the geographic distribution of damage, taking into account various degrees of severity.” (DOJ Guidance at 14- 15)

6 81 FR 117:39691, 2016

7 DOJ Guidance at 6.

8 For example, “the grantee must amend its action plan to update its needs assessment, modify or create new activities, or reprogram funds, as necessary.” (81 FR 117:36994, 2016)

Commenter:

M. Madison Sloan
Director, Disaster Recovery and Fair Housing
Project Texas Appleseed
1609 Shoal Creek, Suite 201
Austin, Texas 78701

Staff Response:

The team has reviewed your letter and we greatly appreciate your time and effort in reviewing the Action Plan and the requirements put forth by the U.S. Department of Housing and Urban Development (HUD). With regard to compiling demographic and Low-to-Moderate Income (LMI) data, the State will work with local communities to ensure that their projects consider these data components. As part of their Method of Distribution (MOD) development, the State will ensure that the most-impacted area counties take into consideration LMI figures provided by HUD on their website as well as asking for other data tied to demographics.

Demographic data and LMI data will also be requested from the remaining 112 counties, comprised of over 900 communities, that will be participating in the competition. Demographic and LMI data will be considered when making determinations for projects in the application process.

VIII. Appendix D - FEMA Public Assistance Projected Project Amount

FEMA Public Assistance Projected Project Amount provided by Texas Division of Emergency Management as of July 8, 2016

Applicant Name	County	DR-4223	DR-4245	TOTAL
ANGELINA (COUNTY)	Angelina	\$1,115,352	N/A	\$1,115,352
HUDSON	Angelina	\$462,498	N/A	\$462,498
ZAVALLA	Angelina	\$26,166	N/A	\$26,166
ARCHER (COUNTY)	Archer	\$562,567	N/A	\$562,567
ARCHER CITY	Archer	\$35,571	N/A	\$35,571
HOLLIDAY	Archer	\$0	N/A	\$0
LAKESIDE CITY	Archer	\$96,826	N/A	\$96,826
MEGARGEL	Archer	\$0	N/A	\$0
SCOTLAND	Archer	\$96,933	N/A	\$96,933
WINDTHORST	Archer	\$110,250	N/A	\$110,250
AUSTIN (COUNTY)	Austin	\$747,419	N/A	\$747,419
INDUSTRY	Austin	\$0	N/A	\$0
SAN FELIPE	Austin	\$396,290	N/A	\$396,290
AQUA WATER SUPPLY CORPORATION	Bastrop	\$342,358	\$55,366	\$397,724
BASTROP	Bastrop	\$0	N/A	\$0
BASTROP (COUNTY)	Bastrop	\$1,396,837	\$650,000	\$2,046,837
BASTROP COUNTY WATER CONTROL & IMPROVEMENT DIST 2	Bastrop	\$279,827	N/A	\$279,827
ELGIN	Bastrop	\$64,160	\$80,815	\$144,976

Applicant Name	County	DR-4223	DR-4245	TOTAL
SMITHVILLE	Bastrop	\$53,645	N/A	\$53,645
BAYLOR (COUNTY)	Baylor	\$123,445	N/A	\$123,445
SEYMOUR	Baylor	\$10,690	N/A	\$10,690
CITY PUBLIC SERVICE BOARD (CPS ENERGY)	Bexar	N/A	\$55,184	\$55,184
BLANCO	Blanco	\$143,002	N/A	\$143,002
BLANCO (COUNTY)	Blanco	\$140,304	N/A	\$140,304
BLANCO COUNTY EMERGENCY SERVICES DISTRICT #2	Blanco	\$0	N/A	\$0
BLANCO EMERGENCY MEDICAL SERVICES	Blanco	\$7,004	N/A	\$7,004
BLANCO VOLUNTEER FIRE DEPT	Blanco	\$6,543	N/A	\$6,543
FRIENDS OF THE BLANCO STATE PARK	Blanco	\$0	N/A	\$0
GEM OF THE HILLS COMMUNITY CENTER	Blanco	\$0	N/A	\$0
JOHNSON CITY	Blanco	\$44,702	N/A	\$44,702
BOSQUE (COUNTY)	Bosque	\$420,416	\$443,839	\$864,254
CLIFTON	Bosque	N/A	\$34,433	\$34,433
VALLEY MILLS	Bosque	\$35,179	N/A	\$35,179
BOWIE (COUNTY)	Bowie	\$800,055	N/A	\$800,055
C 5 RED LICK LEARY VOLUNTEER FIRE DEPARTMENT	Bowie	\$0	N/A	\$0
DE KALB	Bowie	\$61,753	N/A	\$61,753
MAUD	Bowie	\$0	N/A	\$0
NASH	Bowie	\$3,508	N/A	\$3,508

Applicant Name	County	DR-4223	DR-4245	TOTAL
NEW BOSTON	Bowie	\$41,091	N/A	\$41,091
RED LICK	Bowie	\$34,985	N/A	\$34,985
TEXARKANA	Bowie	\$0	N/A	\$0
WAKE VILLAGE	Bowie	\$3,989	N/A	\$3,989
ANGLETON	Brazoria	\$13,230	N/A	\$13,230
BRAZORIA (COUNTY)	Brazoria	\$4,370,898	N/A	\$4,370,898
FREEPORT	Brazoria	\$8,550	N/A	\$8,550
HOLIDAY LAKES	Brazoria	\$0	N/A	\$0
LAKE JACKSON	Brazoria	\$160,351	N/A	\$160,351
BLANKET	Brown	\$7,854	N/A	\$7,854
BROWN (COUNTY)	Brown	\$1,016,855	N/A	\$1,016,855
BURLESON (COUNTY)	Burleson	\$524,583	N/A	\$524,583
SOMERVILLE	Burleson	\$49,916	N/A	\$49,916
CALDWELL (COUNTY)	Caldwell	\$310,684	\$113,732	\$424,416
LULING	Caldwell	\$125,041	\$137,660	\$262,701
MARTINDALE	Caldwell	\$46,439	\$15,827	\$62,266
CALLAHAN (COUNTY)	Callahan	\$1,239,116	N/A	\$1,239,116
ATLANTA	Cass	\$0	N/A	\$0
AVINGER	Cass	\$0	N/A	\$0
CASS (COUNTY)	Cass	\$269,308	N/A	\$269,308
CHEROKEE (COUNTY)	Cherokee	\$748,922	N/A	\$748,922
JACKSONVILLE	Cherokee	\$418,018	N/A	\$418,018
NEW SUMMERFIELD (SUMMERFIELD)	Cherokee	\$0	N/A	\$0

Applicant Name	County	DR-4223	DR-4245	TOTAL
BELLEVUE	Clay	\$0	N/A	\$0
CLAY (COUNTY)	Clay	\$257,402	N/A	\$257,402
HENRIETTA	Clay	\$0	N/A	\$0
PROSPER	Collin	\$40,860	N/A	\$40,860
COLLINGSWORTH (COUNTY)	Collingsworth	\$181,291	N/A	\$181,291
COLORADO (COUNTY)	Colorado	\$748,755	N/A	\$748,755
BULVERDE	Comal	N/A	\$121,385	\$121,385
BULVERDE-SPRING BRANCH EMERGENCY SERVICES	Comal	\$16,400	\$13,755	\$30,155
COMAL (COUNTY)	Comal	\$274,909	\$491,909	\$766,818
COMAL COUNTY EMERGENCY SERVICES DISTRICT NO. 3	Comal	N/A	\$3,769	\$3,769
NEW BRAUNFELS	Comal	\$19,581	\$260,418	\$279,999
NEW BRAUNFELS UTILITIES	Comal	N/A	\$40,000	\$40,000
WATER ORIENTED RECREATION DISTRICT OF COMAL COUNTY	Comal	N/A	\$72,432	\$72,432
COMANCHE (COUNTY)	Comanche	\$6,363,470	N/A	\$6,363,470
DE LEON	Comanche	\$0	N/A	\$0
GUSTINE	Comanche	\$0	N/A	\$0
COOKE (COUNTY)	Cooke	\$6,408,717	N/A	\$6,408,717
COOKE COUNTY ELECTRIC CO-OP	Cooke	\$576,688	N/A	\$576,688
GAINESVILLE	Cooke	\$714,515	N/A	\$714,515
INDIAN CREEK VOLUNTEER FIRE DEPARTMENT	Cooke	\$0	N/A	\$0
LINDSAY	Cooke	\$24,914	N/A	\$24,914

Applicant Name	County	DR-4223	DR-4245	TOTAL
MUENSTER	Cooke	\$90,740	N/A	\$90,740
OAK RIDGE	Cooke	\$0	N/A	\$0
VALLEY VIEW	Cooke	\$27,107	N/A	\$27,107
VALLEY VIEW FIRE DEPT	Cooke	\$0	N/A	\$0
CORYELL (COUNTY)	Coryell	\$227,604	N/A	\$227,604
GATESVILLE	Coryell	\$56,030	N/A	\$56,030
PIDCOKE CEMETARY ASSOCIATION	Coryell	\$0	N/A	\$0
CARROLLTON	Dallas	\$1,203,581	N/A	\$1,203,581
CEDAR HILL	Dallas	\$43,518	N/A	\$43,518
COPPELL	Dallas	\$83,496	N/A	\$83,496
DALLAS	Dallas	\$5,896,330	N/A	\$5,896,330
DALLAS (COUNTY)	Dallas	\$150,650	N/A	\$150,650
DALLAS COUNTY UTILITY AND RECLAMATION DISTRICT	Dallas	\$98,399	N/A	\$98,399
FARMERS BRANCH	Dallas	\$74,259	N/A	\$74,259
GARLAND	Dallas	\$830,542	N/A	\$830,542
GRAND PRAIRIE	Dallas	\$1,826,839	N/A	\$1,826,839
GRAND PRAIRIE ISD	Dallas	\$255,000	N/A	\$255,000
IRVING	Dallas	\$3,058,322	N/A	\$3,058,322
MESQUITE	Dallas	\$96,569	N/A	\$96,569
ROWLETT	Dallas	\$288,764	N/A	\$288,764
SACHSE	Dallas	\$23,800	N/A	\$23,800
DELTA (COUNTY)	Delta	\$333,764	N/A	\$333,764
ARGYLE	Denton	\$13,864	N/A	\$13,864

Applicant Name	County	DR-4223	DR-4245	TOTAL
ARGYLE VOLUNTEER FIRE DEPT	Denton	\$0	N/A	\$0
CLARK	Denton	\$118,134	N/A	\$118,134
DENTON	Denton	\$201,986	N/A	\$201,986
DENTON (COUNTY)	Denton	\$352,082	N/A	\$352,082
DENTON COUNTY FRESHWATER SUPPLY DIST #1-A	Denton	\$114,244	N/A	\$114,244
DENTON COUNTY TRANSPORTATION AUTHORITY	Denton	\$3,313,005	N/A	\$3,313,005
FLOWER MOUND	Denton	\$209,977	N/A	\$209,977
FRISCO	Denton	\$5,548	N/A	\$5,548
HICKORY CREEK	Denton	\$100,730	N/A	\$100,730
HIGHLAND VILLAGE	Denton	\$296,592	N/A	\$296,592
KRUGERVILLE	Denton	\$0	N/A	\$0
KRUM	Denton	\$64,873	N/A	\$64,873
LAKE DALLAS	Denton	\$157,999	N/A	\$157,999
LEWISVILLE	Denton	\$92,549	N/A	\$92,549
LITTLE ELM	Denton	\$546,320	N/A	\$546,320
OAK POINT	Denton	\$0	N/A	\$0
SHADY SHORES	Denton	\$168,434	N/A	\$168,434
TEXAS WOMAN'S UNIVERSITY	Denton	\$30,247	N/A	\$30,247
THE COLONY	Denton	\$143,231	N/A	\$143,231
TROPHY CLUB	Denton	\$275,391	N/A	\$275,391
CUERO	DeWitt	\$27,427	N/A	\$27,427
DEWITT (COUNTY)	DeWitt	\$50,323	N/A	\$50,323

Applicant Name	County	DR-4223	DR-4245	TOTAL
DICKENS (COUNTY)	Dickens	\$96,553	N/A	\$96,553
DUVAL (COUNTY)	Duval	\$451,261	N/A	\$451,261
FREER	Duval	\$5,982	N/A	\$5,982
CISCO	Eastland	\$0	N/A	\$0
EASTLAND (COUNTY)	Eastland	\$3,445,592	N/A	\$3,445,592
EASTLAND COUNTY WATER SUPPLY DISTRICT	Eastland	\$221,454	N/A	\$221,454
RANGER	Eastland	\$106,316	N/A	\$106,316
EDWARDS (COUNTY)	Edwards	\$120,403	N/A	\$120,403
ROCKSPRINGS	Edwards	\$0	N/A	\$0
ELLIS (COUNTY)	Ellis	\$843,390	N/A	\$843,390
ELLIS COUNTY LEVEE DISTRICT # 2	Ellis	\$0	N/A	\$0
ENNIS	Ellis	\$15,052	N/A	\$15,052
ITALY	Ellis	\$71,689	N/A	\$71,689
MAYPEARL	Ellis	\$0	N/A	\$0
WAXAHACHIE	Ellis	\$46,675	N/A	\$46,675
ERATH (COUNTY)	Erath	\$417,954	N/A	\$417,954
STEPHENVILLE	Erath	\$290,449	N/A	\$290,449
BOIS D'ARC MUN.UTIL.DISTRICT	Fannin	\$19,761	N/A	\$19,761
BONHAM	Fannin	\$175,205	N/A	\$175,205
ECTOR	Fannin	\$0	N/A	\$0
FANNIN (COUNTY)	Fannin	\$564,455	N/A	\$564,455
LADONIA	Fannin	\$0	N/A	\$0
FAYETTE (COUNTY)	Fayette	\$334,199	N/A	\$334,199

Applicant Name	County	DR-4223	DR-4245	TOTAL
FRIO (COUNTY)	Frio	\$16,062	N/A	\$16,062
MOORE WATER SUPPLY CORPORATION	Frio	\$0	N/A	\$0
GAINES (COUNTY)	Gaines	\$40,193	N/A	\$40,193
NE GAINES COUNTY EM SERVICES DIST #1	Gaines	\$11,128	N/A	\$11,128
SEAGRAVES	Gaines	\$92,898	N/A	\$92,898
GARZA (COUNTY)	Garza	\$154,709	N/A	\$154,709
POST	Garza	\$41,801	N/A	\$41,801
FREDERICKSBURG	Gillespie	\$309,792	N/A	\$309,792
GONZALES	Gonzales	\$124,964	N/A	\$124,964
GONZALES (COUNTY)	Gonzales	\$50,368	N/A	\$50,368
WAELDER	Gonzales	\$3,325	N/A	\$3,325
BELLS	Grayson	\$17,919	N/A	\$17,919
DENISON	Grayson	\$356,337	N/A	\$356,337
DORCHESTER	Grayson	\$8,895	N/A	\$8,895
GRAYSON (COUNTY)	Grayson	\$1,115,731	N/A	\$1,115,731
GUNTER	Grayson	\$0	N/A	\$0
SHERMAN	Grayson	\$580,240	N/A	\$580,240
SOUTHMAYD	Grayson	\$51,509	N/A	\$51,509
TOM BEAN	Grayson	\$0	N/A	\$0
VAN ALSTYNE	Grayson	\$101,941	N/A	\$101,941
WHITEWRIGHT	Grayson	\$31,012	N/A	\$31,012
GRIMES (COUNTY)	Grimes	\$606,247	N/A	\$606,247

Applicant Name	County	DR-4223	DR-4245	TOTAL
NAVASOTA	Grimes	\$131,126	N/A	\$131,126
GUADALUPE (COUNTY)	Guadalupe	N/A	\$199,457	\$199,457
HALL (COUNTY)	Hall	\$559,438	N/A	\$559,438
HARDIN (COUNTY)	Hardin	\$277,756	N/A	\$277,756
BELLAIRE	Harris	\$177,153	N/A	\$177,153
DEER PARK	Harris	\$517,077	N/A	\$517,077
HARRIS (COUNTY)	Harris	\$1,962,684	N/A	\$1,962,684
HARRIS COUNTY FLOOD CONTROL	Harris	\$280,797	N/A	\$280,797
HOUSTON	Harris	\$7,067,275	N/A	\$7,067,275
HOUSTON INDEPENDENT SCHOOL DISTRICT	Harris	\$630,169	N/A	\$630,169
JACINTO CITY	Harris	\$0	N/A	\$0
METROPOLITAN TRANSIT AUTH. OF HARRIS CO	Harris	\$422,437	N/A	\$422,437
NASSAU BAY	Harris	\$0	N/A	\$0
PINEY POINT VILLAGE (CORPORATE NAME FOR PINEY POINT)	Harris	\$1,079,818	N/A	\$1,079,818
UNITED ORTHODOX SYNAGOGUES	Harris	\$0	N/A	\$0
HARRISON (COUNTY)	Harrison	\$270,603	N/A	\$270,603
MARSHALL	Harrison	\$126,240	N/A	\$126,240
HARTLEY (COUNTY)	Hartley	\$25,769	N/A	\$25,769
BUDA	Hays	N/A	\$560,139	\$560,139
DRIPPING SPRINGS	Hays	N/A	\$426,467	\$426,467
HAYS (COUNTY)	Hays	\$3,139,437	\$1,815,000	\$4,954,437

Applicant Name	County	DR-4223	DR-4245	TOTAL
HAYS COUNTY DEVELOPMENT DISTRICT NO 1	Hays	\$0	N/A	\$0
HAYS COUNTY EMERGENCY SERVICES DISTRICT #3	Hays	\$6,906	N/A	\$6,906
HAYS COUNTY EMERGENCY SERVICES DISTRICT #5	Hays	\$22,362	\$12,132	\$34,494
HAYS COUNTY EMERGENCY SERVICES DISTRICT #6	Hays	\$16,712	N/A	\$16,712
KYLE	Hays	N/A	\$1,278,622	\$1,278,622
SAN MARCOS	Hays	\$582,850	\$2,268,000	\$2,850,850
SAN MARCOS HOUSING AUTHORITY	Hays	\$566,153	\$300,000	\$866,153
UHLAND	Hays	N/A	\$135,000	\$135,000
WIMBERLEY	Hays	\$106,589	\$60,000	\$166,589
WIMBERLEY EMERGENCY MEDICAL	Hays	\$20,377	N/A	\$20,377
WIMBERLEY SCHOOL DISTRICT	Hays	\$222,312	N/A	\$222,312
WIMBERLEY VOLUNTEER FIRE DEPARTMENT	Hays	\$25,510	N/A	\$25,510
WOODCREEK	Hays	N/A	\$6,724	\$6,724
ATHENS	Henderson	\$68,285	N/A	\$68,285
BROWNSBORO	Henderson	\$49,563	N/A	\$49,563
BROWNSBORO SUPERINTENDENT'S	Henderson	\$139,080	N/A	\$139,080
CANEY CITY	Henderson	\$5,154	N/A	\$5,154
CHANDLER	Henderson	\$46,744	N/A	\$46,744
EAST CEDAR CREEK FRESH WATER	Henderson	\$135,007	N/A	\$135,007
EUSTACE	Henderson	\$4,509	N/A	\$4,509

Applicant Name	County	DR-4223	DR-4245	TOTAL
GUN BARREL CITY	Henderson	\$66,917	N/A	\$66,917
HENDERSON (COUNTY)	Henderson	\$1,001,511	N/A	\$1,001,511
LOG CABIN	Henderson	\$74,651	N/A	\$74,651
MALAKOFF	Henderson	\$67,252	N/A	\$67,252
MURCHISON	Henderson	\$58,815	N/A	\$58,815
PAYNE SPRINGS	Henderson	\$383,811	N/A	\$383,811
PAYNE SPRINGS FIRE DEPT	Henderson	\$9,334	N/A	\$9,334
SEVEN POINTS	Henderson	\$32,515	N/A	\$32,515
TRINIDAD	Henderson	\$119,262	N/A	\$119,262
ALAMO	Hidalgo	\$31,982	N/A	\$31,982
DONNA	Hidalgo	N/A	\$225,289	\$225,289
EDINBURG	Hidalgo	\$881,726	N/A	\$881,726
EDINBURG SCHOOL DISTRICT	Hidalgo	\$73,628	N/A	\$73,628
HIDALGO (COUNTY)	Hidalgo	\$6,967,484	\$4,035,050	\$11,002,534
HIDALGO COUNTY DRAINAGE DISTRICT #1	Hidalgo	\$17,993	N/A	\$17,993
HIDALGO COUNTY IRRIGATION DISTRICT NO. 6	Hidalgo	N/A	\$0	\$0
LA JOYA INDEPENDENT SCHL DIST	Hidalgo	\$50,041	N/A	\$50,041
LA VILLA	Hidalgo	N/A	\$22,145	\$22,145
PALMVIEW	Hidalgo	\$125,308	N/A	\$125,308
PROGRESO	Hidalgo	N/A	\$59,150	\$59,150
SAN JUAN	Hidalgo	\$120,975	N/A	\$120,975
WESLACO	Hidalgo	N/A	\$412,789	\$412,789

Applicant Name	County	DR-4223	DR-4245	TOTAL
WESLACO INDEPENDENT SCHL DIST	Hidalgo	N/A	\$172,675	\$172,675
AQUILLA WATER SUPPLY CORPORATION	Hill	N/A	\$240,000	\$240,000
BIROME WATER SUPPLY CORPORATION	Hill	N/A	\$450,000	\$450,000
BYNUM	Hill	N/A	\$5,493	\$5,493
HILL (COUNTY)	Hill	\$1,684,653	\$1,758,106	\$3,442,759
HILL (COUNTY)	Hill	N/A	N/A	\$0
HUBBARD	Hill	\$12,011	\$182,981	\$194,992
MALONE	Hill	N/A	\$64,864	\$64,864
MOUNT CALM	Hill	N/A	\$69,073	\$69,073
PENELOPE	Hill	N/A	\$26,872	\$26,872
GRANBURY	Hood	\$456,902	N/A	\$456,902
HOOD (COUNTY)	Hood	\$68,301	N/A	\$68,301
LIPAN	Hood	\$11,471	N/A	\$11,471
CUMBY	Hopkins	\$63,726	N/A	\$63,726
HOPKINS (COUNTY)	Hopkins	\$2,117,592	N/A	\$2,117,592
SULPHUR SPRINGS	Hopkins	\$0	N/A	\$0
CROCKETT	Houston	\$163,265	N/A	\$163,265
GRAPELAND	Houston	\$11,158	N/A	\$11,158
HOUSTON (COUNTY)	Houston	\$1,326,024	N/A	\$1,326,024
KENNARD	Houston	\$3,084	N/A	\$3,084
JACK (COUNTY)	Jack	\$627,880	N/A	\$627,880
JASPER (COUNTY)	Jasper	\$678,477	\$99,884	\$778,361

Applicant Name	County	DR-4223	DR-4245	TOTAL
KIRBYVILLE	Jasper	\$47,992	N/A	\$47,992
ALICE	Jim Wells	\$63,387	N/A	\$63,387
JIM WELLS (COUNTY)	Jim Wells	\$939,889	N/A	\$939,889
ORANGE GROVE	Jim Wells	\$379,773	N/A	\$379,773
PREMONT	Jim Wells	\$141,547	N/A	\$141,547
CLEBURNE	Johnson	\$164,269	N/A	\$164,269
JOHNSON (COUNTY)	Johnson	\$397,759	N/A	\$397,759
KEENE	Johnson	\$0	N/A	\$0
VENUS	Johnson	\$33,241	N/A	\$33,241
HAMLIN	Jones	\$0	N/A	\$0
JONES (COUNTY)	Jones	\$1,813,124	N/A	\$1,813,124
KAUFMAN	Kaufman	\$43,739	N/A	\$43,739
KAUFMAN (COUNTY)	Kaufman	\$363,917	N/A	\$363,917
POST OAK BEND CITY	Kaufman	\$16,486	N/A	\$16,486
ROSSER	Kaufman	\$0	N/A	\$0
TALTY	Kaufman	\$0	N/A	\$0
TERRELL	Kaufman	\$595,742	N/A	\$595,742
BOERNE	Kendall	\$49,717	N/A	\$49,717
KENDALL (COUNTY)	Kendall	\$272,340	N/A	\$272,340
LAMAR (COUNTY)	Lamar	\$3,251,471	N/A	\$3,251,471
PARIS	Lamar	\$54,458	N/A	\$54,458
LEE (COUNTY)	Lee	\$211,044	N/A	\$211,044
LEXINGTON	Lee	\$9,273	N/A	\$9,273

Applicant Name	County	DR-4223	DR-4245	TOTAL
BUFFALO	Leon	\$105,863	N/A	\$105,863
FLO COMMUNITY WATER SUPPLY CORP.	Leon	\$12,182	N/A	\$12,182
JEWETT	Leon	\$15,150	N/A	\$15,150
LEON (COUNTY)	Leon	\$279,750	N/A	\$279,750
NORMANGEE	Leon	\$24,915	N/A	\$24,915
AMES	Liberty	\$7,385	N/A	\$7,385
HARDIN	Liberty	\$13,538	N/A	\$13,538
LIBERTY	Liberty	\$135,608	\$17,951	\$153,559
LIBERTY (COUNTY)	Liberty	\$589,332	\$897,627	\$1,486,959
LIBERTY COUNTY WATER CONTROL IMP DISTRICT #5	Liberty	\$1,953,352	\$76,031	\$2,029,383
LUBBOCK (COUNTY)	Lubbock	\$1,007,251	N/A	\$1,007,251
SHALLOWATER	Lubbock	\$568,414	N/A	\$568,414
LYNN (COUNTY)	Lynn	\$185,053	N/A	\$185,053
MADISON (COUNTY)	Madison	\$684,449	N/A	\$684,449
MIDWAY	Madison	\$12,165	N/A	\$12,165
MCLENNAN (COUNTY)	McLennan	\$121,483	N/A	\$121,483
WACO	McLennan	\$1,452,783	N/A	\$1,452,783
BUCKHOLTS	Milam	\$1,000	N/A	\$1,000
MILAM (COUNTY)	Milam	\$399,624	N/A	\$399,624
MILANO	Milam	\$12,646	N/A	\$12,646
ROCKDALE	Milam	\$71,555	N/A	\$71,555
BOWIE	Montague	\$0	N/A	\$0

Applicant Name	County	DR-4223	DR-4245	TOTAL
BOWIE INDEPENDENT SCHOOL DIST	Montague	\$99,690	N/A	\$99,690
BOWIE MEMORIAL HOSPITAL	Montague	\$0	N/A	\$0
MONTAGUE (COUNTY)	Montague	\$17,498,423	N/A	\$17,498,423
NOCONA	Montague	\$0	N/A	\$0
NOCONA GENERAL HOSPITAL	Montague	\$18,086	N/A	\$18,086
NORTH MONTAGUE COUNTY WATER SUPPLY DIST	Montague	\$31,434	N/A	\$31,434
PRAIRIE VALLEY SCHOOL	Montague	\$0	N/A	\$0
ST. JO	Montague	\$45,024	N/A	\$45,024
NACOGDOCHES (COUNTY)	Nacogdoches	\$1,574,382	N/A	\$1,574,382
ANGUS	Navarro	\$0	N/A	\$0
BLOOMING GROVE	Navarro	N/A	\$24,439	\$24,439
CHATFIELD WATER SUPPLY	Navarro	N/A	\$198,740	\$198,740
CORBET WATER SUPPLY CORP	Navarro	N/A	\$15,893	\$15,893
CORSICANA	Navarro	\$1,242,389	\$2,749,123	\$3,991,512
DAWSON	Navarro	\$32,100	N/A	\$32,100
FROST	Navarro	\$0	N/A	\$0
GOODLOW	Navarro	\$10,609	N/A	\$10,609
MILDRED	Navarro	\$0	N/A	\$0
NAVARRO (COUNTY)	Navarro	\$1,051,286	\$3,615,154	\$4,666,440
OAK VALLEY	Navarro	\$57,670	\$23,722	\$81,392
RICE	Navarro	N/A	\$20,683	\$20,683
RICE WATER SUPPLY	Navarro	N/A	\$59,350	\$59,350
RICHLAND	Navarro	\$29,627	\$69,662	\$99,289

Applicant Name	County	DR-4223	DR-4245	TOTAL
NEWTON	Newton	N/A	\$12,098	\$12,098
NEWTON (COUNTY)	Newton	\$390,064	\$43,432	\$433,495
AGUA DULCE	Nueces	\$9,279	N/A	\$9,279
BISHOP	Nueces	\$75,031	N/A	\$75,031
CORPUS CHRISTI	Nueces	\$2,075,525	N/A	\$2,075,525
DRISCOLL	Nueces	\$114,777	N/A	\$114,777
NUECES (COUNTY)	Nueces	\$618,313	N/A	\$618,313
NUECES COUNTY EMERGENCY SERVICES DISTRICT #1	Nueces	\$0	N/A	\$0
ROBSTOWN	Nueces	\$299,432	N/A	\$299,432
ORANGE (COUNTY)	Orange	\$397,669	N/A	\$397,669
MINERAL WELLS	Palo Pinto	\$118,368	N/A	\$118,368
PALO PINTO (COUNTY)	Palo Pinto	\$101,363	N/A	\$101,363
ALEDO	Parker	\$1,000	N/A	\$1,000
ANNETTA NORTH	Parker	\$6,063	N/A	\$6,063
HUDSON OAKS	Parker	\$16,323	N/A	\$16,323
PARKER (COUNTY)	Parker	\$576,264	N/A	\$576,264
RENO	Parker	\$354,090	N/A	\$354,090
SPRINGTOWN	Parker	\$844,306	N/A	\$844,306
WEATHERFORD	Parker	\$0	N/A	\$0
POLK (COUNTY)	Polk	\$245,665	N/A	\$245,665
CAMP WOOD	Real	\$0	N/A	\$0
REAL (COUNTY)	Real	\$276,467	N/A	\$276,467
AVERY	Red River	\$0	N/A	\$0

Applicant Name	County	DR-4223	DR-4245	TOTAL
BOGATA	Red River	\$26,907	N/A	\$26,907
CLARKSVILLE	Red River	\$126,548	N/A	\$126,548
RED RIVER (COUNTY)	Red River	\$1,006,470	N/A	\$1,006,470
AUSTWELL	Refugio	\$24,980	N/A	\$24,980
BAYSIDE	Refugio	\$299,758	N/A	\$299,758
REFUGIO (COUNTY)	Refugio	\$0	N/A	\$0
CALVERT	Robertson	\$16,376	N/A	\$16,376
HEARNE	Robertson	\$103,327	N/A	\$103,327
ROBERTSON (COUNTY)	Robertson	\$251,026	N/A	\$251,026
CRIMS CHAPEL VOLUNTEER FIRE	Rusk	\$0	N/A	\$0
HENDERSON	Rusk	\$307,134	N/A	\$307,134
RUSK (COUNTY)	Rusk	\$83,756	N/A	\$83,756
SABINE (COUNTY)	Sabine	\$230,725	N/A	\$230,725
SAN AUGUSTINE (COUNTY)	San Augustine	\$0	N/A	\$0
POINT BLANK (CORPORATE NAME FOR POINTBLANK)	San Jacinto	\$150,164	N/A	\$150,164
SAN JACINTO (COUNTY)	San Jacinto	\$1,620,518	N/A	\$1,620,518
SHEPHERD	San Jacinto	\$0	N/A	\$0
JOAQUIN	Shelby	\$78,250	N/A	\$78,250
SHELBY (COUNTY)	Shelby	\$2,077,559	N/A	\$2,077,559
ARP	Smith	\$37,354	N/A	\$37,354
SMITH (COUNTY)	Smith	\$117,378	N/A	\$117,378
TYLER	Smith	N/A	\$2,324,377	\$2,324,377
GLEN ROSE	Somervell	\$13,735	N/A	\$13,735

Applicant Name	County	DR-4223	DR-4245	TOTAL
SOMERVELL (COUNTY)	Somervell	\$53,477	N/A	\$53,477
SOMERVELL HISTORY FOUNDATION	Somervell	\$0	N/A	\$0
LA GRULLA	Starr	\$0	N/A	\$0
RIO GRANDE CITY	Starr	\$47,528	N/A	\$47,528
ROMA	Starr	\$9,638	N/A	\$9,638
STARR (COUNTY)	Starr	\$30,616	N/A	\$30,616
BLUEBONNET ELECTRIC COOPERATIVE, INC.	Statewide	\$867,928	\$392,795	\$1,260,723
BOWIE - CASS ELECTRIC CO-OP	Statewide	\$224,491	N/A	\$224,491
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY	Statewide	\$137,371	N/A	\$137,371
COMANCHE COUNTY ELECTRIC COOPERATIVE ASSN. INC	Statewide	\$215,329	N/A	\$215,329
DALLAS FORT WORTH INTERNATIONAL AIRPORT	Statewide	\$2,274,337	N/A	\$2,274,337
DELTA LAKE IRRIGATION DISTRICT	Statewide	N/A	\$467,541	\$467,541
EAST TEXAS ELECTRIC COOP, INC	Statewide	\$341,724	N/A	\$341,724
FANNIN COUNTY ELECTRIC COOPERATIVE, INC.	Statewide	\$141,287	N/A	\$141,287
HILCO ELECTRIC COOPERATIVE, INC.	Statewide	\$191,498	N/A	\$191,498
HOUSTON CNTY ELECTRIC COOP ASSN, INC	Statewide	\$236,337	N/A	\$236,337
JASPER-NEWTON ELECTRIC COOP, INC	Statewide	\$140,301	\$81,000	\$221,301
LAMAR COUNTY ELECTRIC COOPERATIVE	Statewide	\$219,676	N/A	\$219,676

Applicant Name	County	DR-4223	DR-4245	TOTAL
LOWER COLORADO RIVER AUTHORITY	Statewide	N/A	\$6,579,765	\$6,579,765
MARTINDALE WATER SUPPLY CORP	Statewide	\$12,988	\$6,384	\$19,373
MAXWELL WATER SUPPLY CORPORATION	Statewide	\$98,000	N/A	\$98,000
METROCREST SERVICES	Statewide	\$0	N/A	\$0
NUECES ELECTRIC COOPERATIVE, INC	Statewide	\$183,858	N/A	\$183,858
PANOLA-HARRISON ELECTRIC COOPERATIVE	Statewide	\$96,113	N/A	\$96,113
PEDERNALES ELECTRIC COOPERATIVE, INC.	Statewide	\$2,550,027	N/A	\$2,550,027
PORT OF HOUSTON AUTHORITY	Statewide	\$1,063,935	N/A	\$1,063,935
RUSK COUNTY ELECTRIC COOP, INC	Statewide	\$513,868	N/A	\$513,868
SAM HOUSTON ELECTRIC COOPERATIVE, INC	Statewide	\$553,195	N/A	\$553,195
SOUTHWEST RURAL ELECTRIC ASSOCIATION	Statewide	\$172,428	N/A	\$172,428
TAYLOR ELECTRIC COOP	Statewide	\$67,275	N/A	\$67,275
TEXAS A&M VETERINARY EMERGENCY TEAM	Statewide	\$61,129	N/A	\$61,129
TEXAS MUNICIPAL POWER AGENCY	Statewide	\$400,937	N/A	\$400,937
TEXAS STATE UNIVERSITY	Statewide	\$1,830,723	\$2,605,000	\$4,435,723
TEXOMA AREA SOLID WASTE AUTHORITY, INC.	Statewide	\$646,963	N/A	\$646,963
TRINITY RIVER AUTHORITY - TRA	Statewide	\$6,555,854	N/A	\$6,555,854
TX A&M FOREST SERVICE	Statewide	\$400,259	\$10,767	\$411,026

Applicant Name	County	DR-4223	DR-4245	TOTAL
TX A&M ENGINEERING EXTENSION SERVICE	Statewide	\$2,000,000	\$262,025	\$2,262,025
TX ANIMAL HEALTH COMMISSION	Statewide	\$13,596	N/A	\$13,596
TX DEPARTMENT OF AGING & DISABILITY SERVICES	Statewide	\$0	N/A	\$0
TX DEPARTMENT OF CRIMINAL JUSTICE	Statewide	\$6,971	N/A	\$6,971
TX DEPARTMENT OF PUBLIC SAFETY	Statewide	\$379,574	\$167,046	\$546,620
TX DEPARTMENT OF STATE HEALTH SERVICES	Statewide	\$50,511	N/A	\$50,511
TX DEPARTMENT OF TRANSPORTATION	Statewide	\$1,999,984	\$222,598	\$2,222,582
TX DIVISION OF EMERGENCY MANAGEMENT	Statewide	\$13,570,276	\$371,977	\$13,942,253
TX HEALTH & HUMAN SERVICES COMMISSION	Statewide	\$0	N/A	\$0
TX MILITARY DEPARTMENT	Statewide	\$1,944,687	\$166,278	\$2,110,965
TX PARKS AND WILDLIFE DEPARTMENT	Statewide	\$2,748,178	\$129,330	\$2,877,508
UNIVERSITY OF HOUSTON	Statewide	\$42,514	N/A	\$42,514
UNIVERSITY OF NORTH TEXAS	Statewide	\$0	N/A	\$0
UNIVERSITY OF TEXAS - M D ANDERSON CANCER CENTER	Statewide	\$435,073	N/A	\$435,073
WOOD COUNTY ELECTRIC COOPERATIVE	Statewide	\$309,393	N/A	\$309,393
ARLINGTON	Tarrant	\$832,518	N/A	\$832,518
COLLEYVILLE	Tarrant	\$12,092	N/A	\$12,092
EULESS	Tarrant	\$111,510	N/A	\$111,510

Applicant Name	County	DR-4223	DR-4245	TOTAL
FORT WORTH	Tarrant	\$1,991,764	N/A	\$1,991,764
GRAPEVINE	Tarrant	\$2,412,435	N/A	\$2,412,435
GRAPEVINE-COLLEYVILLE DISTRICT	Tarrant	\$4,074	N/A	\$4,074
MANSFIELD	Tarrant	\$203,188	N/A	\$203,188
PELICAN BAY	Tarrant	\$16,261	N/A	\$16,261
RICHLAND HILLS (P.O. NAME GREATER RICHLAND AREA)	Tarrant	\$0	N/A	\$0
TARRANT (COUNTY)	Tarrant	\$89,981	N/A	\$89,981
THROCKMORTON (COUNTY)	Throckmorton	\$352,141	N/A	\$352,141
AUSTIN	Travis	\$3,283,734	\$2,596,240	\$5,879,974
AUSTIN COMMUNITY COLLEGE	Travis	\$44,939	N/A	\$44,939
AUSTIN INDEPENDENT SCHOOL DIST	Travis	\$918,046	\$2,520,000	\$3,438,046
CREEDMOOR-MAHA WATER CORP	Travis	N/A	\$447,519	\$447,519
DEL VALLE SCHOOL DISTRICT	Travis	N/A	\$850,010	\$850,010
TRAVIS (COUNTY)	Travis	\$158,462	\$556,669	\$715,130
APPLE SPRINGS FIRE DEPT	Trinity	\$4,643	N/A	\$4,643
TRINITY (COUNTY)	Trinity	\$577,413	N/A	\$577,413
CHESTER	Tyler	\$5,020	N/A	\$5,020
IVANHOE	Tyler	\$207,955	N/A	\$207,955
TYLER (COUNTY)	Tyler	\$276,561	N/A	\$276,561
SABINAL	Uvalde	\$19,204	N/A	\$19,204
UVALDE (COUNTY)	Uvalde	\$941,266	N/A	\$941,266
CALLENDER LAKE PROPERTY OWNERS IMPROV DIST	Van Zandt	\$0	N/A	\$0

Applicant Name	County	DR-4223	DR-4245	TOTAL
GRAND SALINE	Van Zandt	\$48,308	N/A	\$48,308
VAN	Van Zandt	\$1,088,381	N/A	\$1,088,381
VAN INDEPENDENT SCHOOL DIST	Van Zandt	\$3,717,130	N/A	\$3,717,130
VAN ZANDT (COUNTY)	Van Zandt	\$2,976,315	N/A	\$2,976,315
VICTORIA	Victoria	\$92,907	N/A	\$92,907
VICTORIA (COUNTY)	Victoria	\$78,853	N/A	\$78,853
HUNTSVILLE	Walker	\$77,298	N/A	\$77,298
WALKER (COUNTY)	Walker	\$2,044,983	\$2,440,629	\$4,485,613
PRAIRIE VIEW	Waller	\$23,469	N/A	\$23,469
WALLER (COUNTY)	Waller	\$473,510	N/A	\$473,510
WASHINGTON (COUNTY)	Washington	\$451,243	N/A	\$451,243
WHARTON	Wharton	\$17,854	N/A	\$17,854
WHARTON (COUNTY)	Wharton	\$1,364,939	N/A	\$1,364,939
ELECTRA	Wichita	\$65,204	N/A	\$65,204
MIDWESTERN STATE UNIVERSITY	Wichita	\$0	N/A	\$0
THOMAS FOWLER AMERICAN LEGION POST 169	Wichita	\$0	N/A	\$0
WICHITA (COUNTY)	Wichita	\$565,405	N/A	\$565,405
WICHITA FALLS	Wichita	\$1,310,787	N/A	\$1,310,787
LYFORD	Willacy	N/A	\$54,470	\$54,470
LYFORD INDEPENDENT SCHOOL DIST	Willacy	N/A	\$137,696	\$137,696
PORT MANSFIELD PUBLIC UTILITY DISTRICT	Willacy	N/A	\$0	\$0
RAYMONDVILLE	Willacy	N/A	\$276,376	\$276,376

Applicant Name	County	DR-4223	DR-4245	TOTAL
SAN PERLITA	Willacy	N/A	\$36,945	\$36,945
SEBASTIAN MUNICIPAL UTILITIES DISTRICT	Willacy	N/A	\$23,881	\$23,881
WILLACY (COUNTY)	Willacy	N/A	\$651,043	\$651,043
WILLACY COUNTY DRAINAGE DIST	Willacy	N/A	\$34,200	\$34,200
WILLACY COUNTY NAV DIST	Willacy	N/A	\$111,235	\$111,235
FLORENCE	Williamson	\$26,696	N/A	\$26,696
HOUSING AUTHORITY OF THE CITY OF TAYLOR	Williamson	\$30,135	N/A	\$30,135
HUTTO	Williamson	\$44,307	N/A	\$44,307
LOWER BRUSHY CREEK WATER CONTROL & IMP DIST	Williamson	\$0	N/A	\$0
ROUND ROCK	Williamson	\$45,766	N/A	\$45,766
ROUND ROCK INDEPENDENT SCHOOL DIST - ISD	Williamson	\$31,471	N/A	\$31,471
TAYLOR	Williamson	\$380,003	N/A	\$380,003
UPPER BRUSHY CREEK WATER CONTROL & IMP DIST	Williamson	\$500,521	N/A	\$500,521
WILLIAMSON (COUNTY)	Williamson	\$574,922	N/A	\$574,922
WILLIAMSON COUNTY EMERGENCY SERVICES DIST #3	Williamson	\$0	N/A	\$0
FLORESVILLE	Wilson	N/A	\$82,393	\$82,393
FLORESVILLE ELECTRIC LIGHT	Wilson	N/A	\$235,000	\$235,000
WILSON (COUNTY)	Wilson	\$1,495,385	N/A	\$1,495,385
AURORA	Wise	\$40,760	N/A	\$40,760
BOYD	Wise	\$0	N/A	\$0

Applicant Name	County	DR-4223	DR-4245	TOTAL
BRIDGEPORT	Wise	\$48,109	N/A	\$48,109
RHOME	Wise	\$32,075	N/A	\$32,075
RUNAWAY BAY	Wise	\$244,034	N/A	\$244,034
WISE (COUNTY)	Wise	\$1,442,474	N/A	\$1,442,474
YOUNG (COUNTY)	Young	\$1,169,754	N/A	\$1,169,754
CRYSTAL CITY	Zavala	\$22,189	N/A	\$22,189
ZAVALA (COUNTY)	Zavala	\$20,811	N/A	\$20,811