



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

October 19, 2022

John P. Buckner, Executive Director
Coastal Bend Council of Governments
2910 Leopard Street
Corpus Christi, Texas 78408

Re: Coastal Bend Council of Governments (CBCOG) CDBG-MIT Regional Mitigation Program Method of Distribution (MOD) Approval

Mr. Buckner:

The Texas General Land Office (GLO) Community Development and Revitalization division (GLO-CDR) is approving the CBCOG Mitigation Method of Distribution (MOD). The MOD delivered to the GLO was initially submitted September 30, 2022, underwent review by GLO staff, and was submitted a final time with corrections made on October 18, 2022.

With this approval, entities receiving funding from the MOD will receive information regarding the application process from the GLO. If you have any questions or require additional information, please contact Alex Swift at alex.swift.glo@recovery.texas.gov.

Sincerely,

Alexandra Gamble

Alexandra Gamble, Policy Development Director
Community Development and Revitalization

Cc: Heather Lagrone, Community Development and Revitalization Senior Deputy Director
Shawn Strange, Community Development and Revitalization Policy Development Manager

Texas General Land Office

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



Delivered to the GLO: 9/30/22 & 10/18/22

Approved by the GLO: 10/19/22

Council of Governments: Coastal Bend

Allocation Calculation Sheet Packet Page Number: Tabs 1,2, 3,

HUD MID and State MID Allocations

HUD MID Total	\$149,509,000.00
State MID Total	\$30,038,000.00
Grand Total COG Allocation	\$179,547,000.00

Table 1

Funding Limits

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

Table 2

Regional Risk Mitigation

Explain how the method of distribution reduces regional risks, how it will foster long-term community resilience that is forward-looking and encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, and flooding in the HUD-identified and State-identified most impacted and distressed areas.

CBCOG chose four factors in allocating the funding: 1. Population, 2. Social Vulnerability Index(SoVI), 3. Percentage of land in a 100 year flood plain and 4. Number of times a community experienced a federally declared disaster.

CBCOG chose population as the first factor using the census.gov ACS (American Community Survey) 5 Year tables.

The SoVI is a multi-factor index that reflects a community’s ability to be resilient to hazards and absorb losses. One factor is the percentage of residents who are employed in the service industry. This is why CBCOG used SoVI in lieu of Low to Moderate income (LMI) because the Coastal Bend has a high percentage of jobs in the tourism and service industry, especially along the coast. According to Workforce Solutions of the Coastal Bend, Restaurants and other Eating Places was the largest industry in the coastal bend in 2021, with Food preparation and related the second largest occupation.

A key data point for the MOD development was the input from the community priorities survey put out by the CBCOG. Community members ranked drainage, flood prevention, and erosion control as the highest priority for the region. As a result the CBCOG MIT MOD chose 100 year floodplain data as one of the factors. The

Texas Water Development Board provided data on the percentage of land in a 100 year flood zone. This identified areas at most risk of flood disasters.

The fourth factor CBCOG choose is number of times a county or community was impacted by a federally declared disaster. We recieved this data using FEMA information proved by GLO, combined with data gleaned from FEMA’s Disaster Delclaration Database. We chose it because community feedback indicated mitigation is needed in areas hit by multiple disasters.

CBCOG set aside 2.5% of the HUD Allocation for a regional project that will provide flooding and stormwater retention well as storm surge protection in an LMI Census tract along the ship channel.

CBCOG understands that the allocation isn’t enough to do everything that needs to be done. The goal is to focus first on protecting the most vulnerable of our community – those who are at social and economic risk, as well as those who are at high risk of flood or storm damage. We look forward to building a stronger Coastal Bend.

Table 3

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Population	50%	2019 ACS 5 Year Estimate	To benefit the most people possible
Social Vulnerability Index	10%	SoVI data	Measures a community’s ability to be resilient after a disaster. A higher score indicates a lower ability to absorb loss
Percentage of Land in 100 year Flood Plain	20%	Texas Water Development Board	To ensure representation by those impacted first and worst when a storm hits
Number of Declared Disasters	20%	FEMA Disaster Declaration Database + 2002-2019 FEMA IA claims greater than \$0	To mitigate repetitive loss

Table 4

*Add more rows if needed

Threshold Factors

If any, please describe threshold factors that were used to allocate funds.

Threshold Factor*	Documentation Source	Explanation of Factor Selection
Population 2,000	2019 ACS 5 Year data	The minimum allocation is \$1,000,000. Therefore, CBCOG set the minimum population at 2,000 citizens to receive direct allocation. CBCOG calculated the allocation for every community, and communities under 2,000 citizens had their allocation rolled into the county allocation. When the MOD receives preliminary

		<p>approval, CBCOG will share the allocation calculations with County officials so they can make informed decisions about where best to spend the allocation.</p> <p>Staff reached out to communities eligible for allocations to ensure they are prepared to accept the funding. One community, Odem, shared that they may not be ready in time to receive the funding. CBCOG made the decision to roll their allocation into the San Patricio county allocation</p>
--	--	---

Table 5

*Add more rows if needed

Eligible Activities

Activities must meet the criteria outlined in the Regional Mitigation Program (COG MODs) section of the State of Texas CDBG Mitigation Action Plan.

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit subrecipients in the region to projects meeting regional priority activities.		
-OR-			
<input type="checkbox"/>	The COG has limited subrecipients in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Flood control and drainage improvement, including the construction or rehabilitation of stormwater management systems	<input type="checkbox"/>	Water and sewer facilities
		<input type="checkbox"/>	Communications infrastructure
		<input type="checkbox"/>	Provision of generators
<input type="checkbox"/>	Natural or green infrastructure	<input type="checkbox"/>	Removal of debris
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/>	Streets or bridges
<input type="checkbox"/>	Economic development (assistance to businesses for the installation of disaster mitigation improvements and technologies; financing to support the development of technologies, systems and other measures to mitigate future disaster impacts; “hardening” of commercial areas and facilities; and financing critical infrastructure sectors to allow continued commercial operations during and after disasters)	<input type="checkbox"/>	Other infrastructure improvements
		<input type="checkbox"/>	Public Services (<i>within the 15% cap</i>)
		<input type="checkbox"/>	FEMA Hazard Mitigation Grant Program (HMGP) cost share for CDBG-MIT eligible project
		<input type="checkbox"/>	Buyouts or Acquisitions with or without relocation assistance, down payment assistance, housing incentives, or demolition
		<input type="checkbox"/>	Activities designed to relocate families outside of floodplains

Table 6

Ineligible Activities

Ineligible activities are outlined in the Regional Mitigation Program section of the State of Texas CDBG Mitigation Action Plan, as amended, and should be referenced accordingly.

Covered Projects

A Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds, regardless of source (CDBG-DR, CDBG-MIT, or CDBG). Covered projects included in the Regional Mitigation Program must meet specific criteria set forth by HUD's CDBG-MIT Notice 84 FR 45838 (August 30, 2019) and the State of Texas Mitigation Action Plan. Inclusion of a Covered Project in the MOD does not guarantee funding until a full eligibility review is completed and the subsequent action plan amendment receives HUD approval.

Will the Method of Distribution include a Covered Project?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
--------------------------	-----	-------------------------------------	----

Table 7

If yes, please provide the following information:

- The eligible entity benefitting from the project;
- A description of the project and how it meets the definition of a mitigation activity; and
- The cost of the Covered Project.

N/A

Table 8

Low- and Moderate-Income Requirements

Below is the strategic plan of how the method of distribution meets the minimum 50 percent low- and moderate-income (LMI) requirement.

Based on input received from the community, a major concern was that projects would not be successful if LMI requirements were too rigidly applied.

With this problem in mind, CBCOG allocated the LMI portion as follows:

- For communities with LMI lower than 30.00%, no LMI funding is allocated. Portland is the only community under 30.00%.
- For communities with LMI between 30.01% - 48.99%, the allocation is based on actual LMI of the community (for example, the City of Bishop has an LMI of 37.54%, Their LMI portion is calculated at 37.54%). Most of the communities fall in this category.
- For communities with LMI between 49.01% and 50.99% the allocation is raised to 72% of funding to LMI based projects. Aransas Pass, Taft, and Kleberg County fall into this category.
- For communities with LMI at 51.00% or higher, 100% funding is allocated to LMI-based projects. The communities affected by this category are Robstown, Mathis, Premont and Kingsville.

CBCOG believes this process will eliminate funds being returned to GLO because a community couldn't find a project that met the LMI requirements. CBCOG believes that this strategy will enable communities to protect the coast, which will ultimately protect the inland communities as well.

Table 9

Public Hearing Information

The Action Plan requires at least one Public Planning Meeting prior to submitting the Preliminary MOD to the GLO for review and one Public Hearing before submission of the Preliminary MOD to GLO for final approval. If the COG holds multiple outreach activities, please contact the GLO for additional documentation forms.

Meeting Type	Public Planning Meeting	MOD Public Hearing
Date(s):	February 16, 2022	August 24, 2022
Location(s):	Coastal Bend Council of Governments 2910 Leopard Street Corpus Christi, TX 78408	Sinton Community Center 1301 East Sinton Street, Sinton, TX 78387
Total Attendance:	6 in person, 12 online	

Table 10

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

Method	Public Planning Meeting	MOD Public Hearing
	Date(s) Sent	Date(s) Sent
<input checked="" type="checkbox"/> Email	2/11/2022	8/17/2022
<input type="checkbox"/> Fax		
<input checked="" type="checkbox"/> Hand Delivery	2/11/2022	
<input type="checkbox"/> Certified Mail		8/15/2022

Table 11

*Website Notice. As required, public notice was posted on the COG website at least **five (5)** days in advance:*

Website Notice	Public Planning Meeting	MOD Public Hearing
Date(s)	2/7/2022	

Table 12

*Published Notice. As required, notice of the public hearing was published in at least one regional newspaper at least **three (3)** days in advance. Notice of the public hearings were published in the following regional newspaper(s):*

Newspaper Name	Public Planning Meeting	MOD Public Hearing
	Date Published	Date Published
Corpus Christi Caller Times	2/12/2022	8/19/2022,8/21/2022
Rockport Pilot	2/12/2022	8/17/2022 8/20/2022
Port Aransas South Jetty	2/10/2022	8/18/2022
Refugio County Press	sent notice on 2/4 but missed deadline for 2/12	Requested 8/19-20-21/2022

Table 13

Public Comment Period

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

Start Date:	8/11/2022	End Date:	8/25/2022	No. of Days:	15
-------------	-----------	-----------	-----------	--------------	----

Table 14

Citizen Participation

Describe how the COG conducted their citizen and non-governmental organization outreach, including any efforts exceeding GLO minimum public participation requirements. These efforts should comply with the Citizen Participation Plan provided to the GLO.

CBCOG sent PSAs to all radio and TV stations, we requested to appear on the Domingo Live show, but were not able to be on, however we were on the KEYS Morning Show with Bob Jones. In addition, we gave a presentation to the Corpus Christi Regional Economic Development Corporation Working Group, as well as the Rockport Fulton Economic Development Corporation. We gave a presentation to the South Texas Lighthouse for the Blind, as well as the Workforce Centers Alice, Corpus Christi and Sinton, and held our meeting after work hours to encourage citizens to attend.

Table 15

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

BCOG had a Spanish Interpreter on site for the meeting. CBCOG offered additional accommodation for anyone upon request

Table 16

Affirmatively Furthering Fair Housing (AFFH) Statement

All subrecipients will certify that they will affirmatively further fair housing (“AFFH”) in their grant agreements and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval of projects. Such review will include assessment of a proposed project’s area demography, socioeconomic characteristics, housing configuration and needs, educational, transportation, and health care opportunities, environmental hazards or concerns, and all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

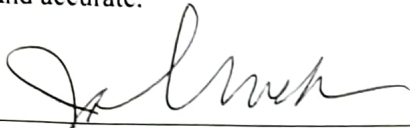
COG Principal Contact Information

Contact Name:	Mary Afuso
Title:	Disaster Recovery Manager

Table 17

Contact and Signatory Authority

Attached is a Resolution from the COG approving the method of distribution and authorizing its submittal to the Texas General Land Office. I certify that the contents of this document and all related attachments are complete and accurate.


Signature

9/30/2022
Date

John Buckner
Printed Name

Executive Director
Title

emily@coastalbendcog.org; John@cbcog98.org
Email Address

361-883-5743
Telephone Number

COG: **Coastal Bend**

Total Allocation: **\$ 179,547,000.00** \$ 89,773,500.00

HUD MID				
Entity	Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage
Aransas County	\$ 10,291,500.00	6.88%	\$ 4,659,000.00	45%
Rockport	\$ 3,447,500.00	2.31%	\$ 1,422,800.00	41%
Nueces County	\$ 31,252,100.00	20.90%	\$ 13,300,900.00	43%
Bishop	\$ 3,849,700.00	2.57%	\$ 1,445,200.00	38%
CBCOG	\$ 4,488,700.00	3.00%	\$ 4,488,700.00	100%
Corpus Christi	\$ 15,092,700.00	10.09%	\$ 6,373,600.00	42%
Port Aransas	\$ 5,385,600.00	3.60%	\$ 2,121,400.00	39%
Robstown	\$ 6,778,900.00	4.53%	\$ 6,778,900.00	100%
Refugio County	\$ 11,622,800.00	7.77%	\$ 4,439,900.00	38%
Town of Refugio	\$ 2,813,300.00	1.88%	\$ 1,316,900.00	47%
San Patricio County	\$ 25,931,300.00	17.34%	\$ 10,683,700.00	41%
Aransas Pass	\$ 5,086,700.00	3.40%	\$ 3,662,400.00	72%
Gregory	\$ 3,946,700.00	2.64%	\$ 1,343,800.00	34%
Ingleside	\$ 5,355,500.00	3.58%	\$ 2,370,400.00	44%
Mathis	\$ 3,330,600.00	2.23%	\$ 3,330,600.00	100%
Portland	\$ 2,269,600.00	1.52%	\$ -	0%
Sinton	\$ 5,304,400.00	3.55%	\$ 2,267,600.00	43%
Taft	\$ 3,261,400.00	2.18%	\$ 2,348,200.00	72%
Total	\$ 149,509,000.00	100.00%	\$ 72,354,000.00	48.39%
State MID				
Entity	Allocation	Percentage of Total Allocation	LMI Portion	LMI Percentage
Bee	\$ 4,701,600.00	15.65%	\$ 1,968,500.00	41.87%
Beeville	\$ 2,663,500.00	8.87%	\$ 1,251,800.00	47.00%
Jim Wells	\$ 7,307,700.00	24.33%	\$ 2,975,000.00	40.71%
Alice	\$ 4,715,300.00	15.70%	\$ 2,053,500.00	43.55%
Premont	\$ 1,626,500.00	5.41%	\$ 1,626,500.00	100.00%
Kleberg	\$ 5,076,900.00	16.90%	\$ 3,655,400.00	72.00%
Kingsville	\$ 3,946,500.00	13.14%	\$ 3,946,500.00	100.00%
Total	\$ 30,038,000.00	100.00%	\$ 17,477,200.00	58.18%

total lmi allocation **\$ 89,831,200.00** **50.03%**

Communities with population under 2,000, rolled into county allocation

Woodsboro	0
Fulton	
Ingleside on the Bay	
Driscoll	
Agua Dulce	
Lake City	
Bayside	
San Patricio	
Lakeside	
Austwell	
Petronila	
Orange Grove	

City shared not ready to receive allocation, rolled into county allocation

Odem

COG: Coastal Bend Total Allocation: \$ 179,547,000.00
 HUD MID Allocation: \$149,509,000.00 State MID Allocation: \$ 30,038,000.00

City or County	First Distribution Factor: Population				Second Distribution Factor: SoVI				Third Distribution Factor: Percent land in floodplain				Fourth Distribution Factor: Disaster Declaration				Entity Weighted Factor Total (EWfTot)	Weighted Factor Total (WFtot)	Proportional Weighted Factor (PWF) EWfTot/WFtot	Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
	Maximum Factor Measure: 362,151.00				Maximum Factor Measure: 5				Maximum Factor: 0.966061				Maximum Factor Measure: 17								
	Factor Weight: 50				Factor Weight: 10				Factor Weight: 20				Factor Weight: 20.00								
Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)						
Council of Governments	N/A		#VALUE!	N/A			#VALUE!	N/A			#VALUE!	N/A			#VALUE!	0.00	696.25	0.00	\$ 149,509,000.00	\$ 4,488,700.00	
Nueces	362,151.00	362,151.00	50	50.00	3	5	10	6.00	0.27	0.966061	20	5.51	17	20	20.00	81.51	696.25	0.12	\$ 145,020,300.00	\$ 31,252,100.00	
Corpus Christi	326,332.00	362,151.00	50	45.05	3	5	10	6.00	0.12	0.966061	20	2.58	16	20	18.82	72.46	696.25	0.10	\$ 145,020,300.00	\$ 15,092,700.00	
San Patricio	66,969.00	362,151.00	50	9.25	3	5	10	6.00	0.22	0.966061	20	4.53	17	20	20.00	39.78	696.25	0.06	\$ 145,020,300.00	\$ 25,931,300.00	
Aransas	24,220.00	362,151.00	50	3.34	3	5	10	6.00	0.57	0.966061	20	11.78	15	20	17.65	696.25	0.06	\$ 145,020,300.00	\$ 10,291,500.00		
Portland	17,807.00	362,151.00	50	2.46	2	5	10	4.00	0.10	0.966061	20	2.09	2	20	2.35	10.90	696.25	0.02	\$ 145,020,300.00	\$ 2,269,600.00	
Robstown	11,214.00	362,151.00	50	1.55	4	5	10	8.00	0.71	0.966061	20	14.76	7	20	8.24	32.55	696.25	0.05	\$ 145,020,300.00	\$ 6,778,900.00	
Rockport	10,815.00	362,151.00	50	1.49	3	5	10	6.00	0.21	0.966061	20	4.35	4	20	4.71	16.55	696.25	0.02	\$ 145,020,300.00	\$ 3,447,500.00	
Ingleside	9,768.00	362,151.00	50	1.35	3	5	10	6.00	0.83	0.966061	20	17.19	1	20	1.18	25.71	696.25	0.04	\$ 145,020,300.00	\$ 5,355,500.00	
Aransas Pass	9,269.00	362,151.00	50	1.28	4	5	10	8.00	0.33	0.966061	20	6.91	7	20	8.24	24.42	696.25	0.04	\$ 145,020,300.00	\$ 5,086,700.00	
Refugio County	7,015.00	362,151.00	50	0.97	3	5	10	6.00	0.16	0.966061	20	3.28	14	20	16.47	26.72	696.25	0.04	\$ 145,020,300.00	\$ 11,622,800.00	
Simton	5,389.00	362,151.00	50	0.74	3	5	10	6.00	0.56	0.966061	20	11.66	6	20	7.06	25.47	696.25	0.04	\$ 145,020,300.00	\$ 5,304,400.00	
Mathis	4,759.00	362,151.00	50	0.66	4	5	10	8.00	0.01	0.966061	20	0.27	6	20	7.06	15.99	696.25	0.02	\$ 145,020,300.00	\$ 3,330,600.00	
Port Aransas	4,203.00	362,151.00	50	0.58	3	5	10	6.00	0.76	0.966061	20	15.75	3	20	3.53	25.86	696.25	0.04	\$ 145,020,300.00	\$ 5,385,600.00	
Bishop	3,085.00	362,151.00	50	0.43	3	5	10	6.00	0.36	0.966061	20	7.35	4	20	4.71	18.48	696.25	0.03	\$ 145,020,300.00	\$ 3,849,700.00	
Taft	2,924.00	362,151.00	50	0.40	3	5	10	6.00	0.22	0.966061	20	4.55	4	20	4.71	15.66	696.25	0.02	\$ 145,020,300.00	\$ 3,261,400.00	
Refugio	2,748.00	362,151.00	50	0.38	3	5	10	6.00	0.17	0.966061	20	3.60	3	20	3.53	13.51	696.25	0.02	\$ 145,020,300.00	\$ 2,813,300.00	
Gregory	2,218.00	362,151.00	50	0.31	3	5	10	6.00	0.27	0.966061	20	5.58	6	20	7.06	18.95	696.25	0.03	\$ 145,020,300.00	\$ 3,946,700.00	
Odem **	2,205.00	362,151.00	50	0.30	3	5	10	6.00	0.16	0.966061	20	3.36	3	20	3.53	13.20	696.25	0.02	\$ 145,020,300.00	\$ 2,748,956.50	
Woodsboro *	1,441.00	362,151.00	50	0.20	3	5	10	6.00	0.01	0.966061	20	0.31	2	20	2.35	8.86	696.25	0.01	\$ 145,020,300.00	\$ 1,845,799.22	
Fulton *	1,202.00	362,151.00	50	0.17	3	5	10	6.00	0.05	0.966061	20	0.95	3	20	3.53	10.64	696.25	0.02	\$ 145,020,300.00	\$ 2,216,483.92	
Ingleside on the Bay *	762.00	362,151.00	50	0.11	1	5	10	2.00	0.36	0.966061	20	7.47	2	20	2.35	11.92	696.25	0.02	\$ 145,020,300.00	\$ 2,483,738.10	
Driscoll *	712.00	362,151.00	50	0.10	5	5	10	10.00	0.97	0.966061	20	20.00	4	20	4.71	34.80	696.25	0.05	\$ 145,020,300.00	\$ 7,249,287.47	
Agua Dulce *	611.00	362,151.00	50	0.08	3	5	10	6.00	0.81	0.966061	20	16.72	2	20	2.35	25.16	696.25	0.04	\$ 145,020,300.00	\$ 5,240,290.77	
Lake City *	506.00	362,151.00	50	0.07	5	5	10	10.00	0.55	0.966061	20	11.32	1	20	1.18	22.57	696.25	0.03	\$ 145,020,300.00	\$ 4,700,621.57	
Bayside *	428.00	362,151.00	50	0.06	3	5	10	6.00	0.22	0.966061	20	4.61	1	20	1.18	11.85	696.25	0.02	\$ 145,020,300.00	\$ 2,467,618.01	
San Patricio *	364.00	362,151.00	50	0.05	3	5	10	6.00	0.56	0.966061	20	11.69	4	20	4.71	22.45	696.25	0.03	\$ 145,020,300.00	\$ 4,675,995.86	
Lakeside *	314.00	362,151.00	50	0.04	3	5	10	6.00	0.36	0.966061	20	7.36	1	20	1.18	14.58	696.25	0.02	\$ 145,020,300.00	\$ 3,036,888.05	
Austwell *	118.00	362,151.00	50	0.02	3	5	10	6.00	0.00	0.966061	20	0.00	2	20	2.35	8.37	696.25	0.01	\$ 145,020,300.00	\$ 1,743,209.21	
Petronila *	89.00	362,151.00	50	0.01	3	5	10	6.00	0.01	0.966061	20	0.21	2	20	2.35	8.57	696.25	0.01	\$ 145,020,300.00	\$ 1,785,055.22	
																Weighted Factor Total:	696.25	1.00		\$ 149,509,000.00	

* population under 2,000, rolled into county allocation

COG: Coastal Bend

Total Allocation: \$ 179,547,000.00

HUD MID Allocation: \$ 149,509,000.00

State MID Allocation: \$ 30,038,000.00

City or County	First Distribution Factor: Population 2020				Second Distribution Factor: SoVI				Third Distribution Factor: % land in flood zone				Fourth Distribution Factor: Declared Disasters				Entity Weighted Factor Total (EWFtot)	Weighted Factor Total (WFtot)	Proportional Weighted Factor (PWF) EWFtot/WFtot	Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
	Maximum Factor Measure:		40,796.00		Maximum Factor Measure:		4		Maximum Factor Measure:		0.821		Maximum Factor Measure:		17						
	Factor Weight: 50				Factor Weight: 10				Factor Weight: 20				Factor Weight: 20								
	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)	Factor Measure (FM)	Factor Measure Maximum (FMmax)	Weight (W)	Weighted Factor Wx(FM/FMmax)					
Jim Wells	40,796.00	40796	50	50.00	3	4	10	7.50	20%	0.821	20	4.87	17	17	20	20.00	82.37	390.82	0.21	\$ 30,038,000.00	\$ 7,307,700
Bee	32,609.00	40796	50	39.97	1	4	10	2.50	14%	0.821	20	3.41	13	17	20	15.29	61.17	390.82	0.16	\$ 30,038,000.00	\$ 4,701,600
Kleberg	30,725.00	40796	50	37.66	3	4	10	7.50	23%	0.821	20	5.60	13	17	20	15.29	66.05	390.82	0.17	\$ 30,038,000.00	\$ 5,076,900
Kingsville	25,367.00	40796	50	31.09	3	4	10	7.50	9%	0.821	20	2.17	9	17	20	10.59	51.35	390.82	0.13	\$ 30,038,000.00	\$ 3,946,500
Alice	18,859.00	40796	50	23.11	4	4	10	10.00	82%	0.821	20	20.00	7	17	20	8.24	61.35	390.82	0.16	\$ 30,038,000.00	\$ 4,715,300
Beeville	14,261.00	40796	50	17.48	3	4	10	7.50	20%	0.821	20	4.97	4	17	20	4.71	34.65	390.82	0.09	\$ 30,038,000.00	\$ 2,663,500
Premont	2,564.00	40796	50	3.14	4	4	10	10.00	14%	0.821	20	3.31	4	17	20	4.71	21.16	390.82	0.05	\$ 30,038,000.00	\$ 1,626,500
Orange Grove*	1,370.00	40796	50	1.68	3	4	10	7.50	0	0.821	20	0.00	3	17	20	3.53	12.71	390.82	0.03	\$ 30,038,000.00	\$ 976,572
Weighted Factor Total:																390.82		1.00		\$ 30,038,000.00	

* population under 2,000, rolled into county allocation

COASTAL BEND COUNCIL OF GOVERNMENTS

RESOLUTION NO. 4030

A RESOLUTION TO ADOPT THE CDBG-MIT PRELIMINARY APPROVED METHOD OF DISTRIBUTION (MOD) OF \$179,547,000.000

WHEREAS, on November 23, 2021, CBCOG entered into an agreement with the General Land Office (GLO) to create a method of distribution (MOD) for the \$179,000,000 allocated to the region; and

WHEREAS the partnership described herein aligns directly with the CEDS Goal 2: Strengthen Resilient Infrastructure Investments, adopted by this Board during the October 2021 meeting; and

WHEREAS the GLO provisionally approved the MOD pending public comment on August 4th, 2022; and

WHEREAS CBCOG held a public meeting on August 24th at the Sinton Community Center; and

WHEREAS CBCOG had public comment open from August 11th through August 25th;

WHEREAS CBCOG posted public comments and responses on the CBCOG website for public review on September 8th;

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments approves the attached Method of Distribution (MOD) and hereby recommends the GLO administer the funds to the Coastal Bend in a timely manner.

Duly adopted at a meeting of the Coastal Bend Council of Governments this 30rd day of September 2022



Mayor Patrick Rios, Chairman

ATTEST:



John P. Buckner, Executive Director

Summary of Funding Acknowledgement Letters					
Response received	Entity	Allocation	LMI Portion	Funding Letter Returned	Accepted or Declined
8/10/2022	City of Robstown	\$ 6,778,900.00	\$ 6,778,900.00	Yes	Accepted
8/10/2022	Town of Refugio	\$ 2,813,300.00	\$ 1,316,900.00	Yes	Accepted
8/11/2022	City of Aransas Pass	\$ 5,086,700.00	\$ 3,662,400.00	Yes	Accepted
8/11/2022	City of Alice	\$ 4,715,300.00	\$ 2,053,500.00	Yes	Accepted
8/15/2022	City of Corpus Christi	\$ 15,092,700.00	\$ 6,373,600.00	Yes	Accepted
8/15/2022	City of Gregory	\$ 3,946,700.00	\$ 1,343,800.00	Yes	Accepted
8/23/2022	Refugio County	\$ 11,622,800.00	\$ 4,439,900.00	Yes	Accepted
8/23/2022	City of Kingsville	\$ 3,946,500.00	\$ 3,946,500.00	Yes	Accepted
8/24/2022	City of Beeville	\$ 2,663,500.00	\$ 1,251,800.00	Yes	Accepted
8/25/2022	City of Rockport	\$ 3,447,500.00	\$ 1,422,800.00	Yes	Accepted
8/25/2022	Kleberg County	\$ 5,076,900.00	\$ 3,655,400.00	Yes	Accepted
8/26/2022	CBCOG	\$ 4,488,700.00	\$ 4,488,700.00	Yes	Accepted
8/29/2022	Jim Wells County	\$ 7,307,700.00	\$ 2,975,000.00	Yes	Accepted
8/30/2022	City of Bishop	\$ 3,849,700.00	\$ 1,445,200.00	Yes	Accepted
8/30/2022	San Patricio County	\$ 25,931,300.00	\$ 10,683,700.00	Yes	Accepted
8/30/2022	City of Port Aransas	\$ 5,385,600.00	\$ 2,121,400.00	Yes	Accepted
8/30/2022	City of Portland	\$ 2,269,600.00	\$ -	Yes	Accepted
8/30/2022	City of Premont	\$ 1,626,500.00	\$ 1,626,500.00	Yes	Accepted
8/31/2022	Aransas County	\$ 10,291,500.00	\$ 4,659,000.00	Yes	Accepted
8/31/2022	Nueces County	\$ 31,252,100.00	\$ 13,300,900.00	Yes	Accepted
8/31/2022	City of Ingleside	\$ 5,355,500.00	\$ 2,370,400.00	Yes	Accepted
8/31/2022	City of Sinton	\$ 5,304,400.00	\$ 2,267,600.00	Yes	Accepted
9/1/2022	City of Mathis	\$ 3,330,600.00	\$ 3,330,600.00	Yes	Accepted
9/1/2022	City of Taft	\$ 3,261,400.00	\$ 2,348,200.00	Yes	Accepted
9/1/2022	Bee County	\$ 4,701,600.00	\$ 1,968,500.00	Yes	Accepted
	Total	\$ 179,547,000.00	\$ 89,831,200.00		
	Total Allocated:	\$ 179,547,000.00			
	Total Accepted:	\$ 179,547,000.00			
	Total Declined:		\$0		

MINUTES - PUBLIC MEETING

Wednesday, August 24, 2022, 6:00pm. 1301 E. Sinton St. Sinton, TX 78387

Topic: The provisionally approved method of distribution for the \$179,547,000 in Community Development Block Grant Mitigation Funds allocated to the region to address mitigation needs

Zoom Attendees: Roxana Sando, Patti Hobbs (phobbs@cityofrobstown.com), L Murphy, Lauren Cargill, Gary Smith, Brett Flint, Aswift, RJ Thomas (Host), Ashley, Dr. Katya Wowk, Rhiannon Bezore, Don Forse, Randy Wright

Meeting Opened at 6pm by Emily Martinez. CBCOG contracted with GLO to do allocation. Funding allocation based on Data Decisions. CBCOG worked with Harte Research Institute to develop the MOD. Very important that the data be verifiable – no winners/losers based on relationships.

Mary Afuso explained metrics chosen based on feedback from public planning meeting and meetings with stakeholders. Metrics chosen: Population, Sovi, Percent of land in 100 yr flood zone; Number of federally declared disasters; Min community size: 2000 citizens. The LMI allocation is required 51% of funding to Lmi communities.

Communities under 30% Lmi = 0% Lmi allocation (Portland, tx)

51% + = 100% Lmi allocation (robstown, mathis, Premont, Kingsville)

Dr. Del Angel reviewed Maps

Texas Flood Quilt Data- regional and county flood zones

LMI

Sovi

Population

Emily stated that maps are available for community use in planning projects.

Public comments:

Anne Nyberg (mayor pro-tem of Ingleside On The Bay)

Under 2000 so not eligible but maybe under San Pat, glad it's not just sovi but uses Lmi too

Yolanda Moran- Jim wells county

Question not a comment:- how decision made to use sovi vs Lmi? who was involved in factors for decision making? Emily answered: GLO provided the data points for use then we reviewed and weighted for allocations. Ms Moran stated her question was answered.

Ms. Murphy (Aransas county)- list of allowable projects such as drainage or living shorelines, or drainage or shoreline protection or fiber optics or health clinics → Emily answered: The list is available on GLO website under guidelines.

Ben Molina- council member Corpus Christi

Method of distribution- MOD weighted for 50% for population, entire population so cities have inflated, double counted residents

Patti Hobbs- when allocated the funds, do they have to apply for their projects through GLO? And will the GLO know how much each community is allocated?

Emily Martinez-Yes and yes

Mayor Jo Ann Ehmann (Ingleside on the Bay)- not directly allocated but requested a receipt of funds they would have gotten.

Carrie Meyer- north beach association in CC- in support of the living shoreline breakwater project that's under proposal (working on this since 2014), repetitive loss, 100% of land in 100yr flood zone, north beach is low income, 2 trailer parks, new bridge could impact flooding too

Peter Davidson -Retired Marine Superintendent, I Marine Consultant- protection of USS Lexington (erosion of portside of the ship) and north beach

David Parsons, City Manager Port Aransas- make sure not double counting population

No further questions, Meeting adjourned.

Respectfully submitted

Rhiannon Bezore

Harte Research Institute

Public Comment Summary

Name	Issue	Method	Response
Castellano	Road Improvement	Online Survey	Responded via letter dated 8/30/2022
Davidson	Shoreline Protection	Online Survey	Responded via letter dated 8/30/2022
		In Person	
		Written Comments	
Edwards	Population Methodolgy	Written Comments	Responded via letter dated 8/30/2022
Ehmann	Eligible Communities	In Person	Responded via letter dated 8/30/2022
Hollers	Eligible Entities	Written Comments	Responded via letter dated 8/30/2022
Meyer	Shoreline Protection	In Person	Responded via letter dated 8/30/2022
		Written Comments	
Molina	Population Methodolgy	In Person	Responded via letter dated 8/30/2022
Nyberg	Eligible Communities	In Person	Responded via letter dated 8/30/2022
Parsons	Population Methodolgy	In Person	Responded via letter dated 8/30/2022
Skurow	Population Methodolgy	In Person	Responded via letter dated 8/30/2022
		Written Comments	
Zanoni	Population Methodolgy	Written Comments	Responded via letter dated 8/30/2022

Start Date	End Date	The conditionally approved Open-Ended Response	For a written response, please provide Name
2022-08-22 17:03:28	2022-08-22 17:23:39	Drainage on Scott Street the area flood and needs proper drainage.	Raymond Castellano
2022-08-22 13:31:36	2022-08-22 13:34:20	Need more information please	Rudy Fuentes
		Beach and it's protection for future generations. The economic impact of visitors, savings of future beach and shoreline renorishment, protecting the USS Lexington from storm damage and erosion.The Living Shorelines of Texas Website: www.Thelivingshorelineso ftexas.com Historical 1831: Captain Enrique Villarreal was the recipient of a large grant of land called Rincón del Oso, which included part of the shores of Corpus Christi Bay and the site of what is Nueces County, Corpus Christi. History indicates he was the first title holder of this land including North Beach. Early 1800's: •Historic Reef Road (comprised of	
2022-08-17 09:06:00	2022-08-17 09:12:23	oyster shells) connected	Peter M.Davidson



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Raymond Castellano
607 Chaparral Street.
Alice, TX 78332

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Mr. Castellano:

Thank you for your thoughtful comments regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is the need for better drainage along Scott Street.

The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary when considering disaster-resilient infrastructure, as disaster knows no boundaries.

Once the funding has been allocated, it is up to each community to determine how to use their allocation to benefit their citizens. Coastal Bend Council of Governments is not part of the decision-making process when it comes to which projects will receive funding.

We are working closely with our Cities and Counties to ensure they are aware of comments such as this, and the benefits of leveraging shared resources to benefit the region. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you for your continued support of the work we do here at CBCOG!

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Mayor JoAnn Ehmann
Ingleside on the Bay
475 Starlight Drive
Ingleside, TX 78362

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Mayor Ehmann:

Thank you for your thoughtful comments regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is being excluded from consideration for funding.

For this funding, Coastal Bend Council of Governments did not expand the pool of eligible applicants beyond Counties and Cities with more than two thousand citizens. The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). With this in mind, we narrowed the pool of applicants to prevent dividing the funds into several small awards. Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries.

We are working closely with our counties to ensure they are aware of the needs of smaller communities, and the benefits of leveraging shared resources to benefit the region. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you for your continued support and participation in the work of the CBCOG!

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Martinez", is written over a light blue horizontal line.

Emily Martinez
Director of Regional Economic Development



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Mayor Pro-Tem Ann Nyberg
Ingleside on the Bay
475 Starlight Drive
Ingleside, TX 78362

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Mayor Pro-Tem Nyberg:

Thank you for your thoughtful comments regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is being excluded from consideration for funding.

For this funding, Coastal Bend Council of Governments did not expand the pool of eligible applicants beyond Counties and Cities with more than two thousand citizens. The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). With this in mind, we narrowed the pool of applicants to prevent dividing the funds into several small awards. Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries.

We are working closely with our counties to ensure they are aware of the needs of smaller communities, and the benefits of leveraging shared resources to benefit the region.

I'm available to meet with you at your convenience if you have any additional concerns.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez".

Emily Martinez
Director of Regional Economic Development



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Councilmember Ben Molina
City of Corpus Christi
1201 Leopard St
Corpus Christi, TX 78401

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Council Member Molina:

Thank you for attending the public meeting regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters. Thank you for your thoughtful comments regarding the methodology of allocation.

As we understand, your stated concern was county population was artificially inflated by including city population in the overall county numbers. You cited CARES Act allocation by the State of Texas for jurisdictions under 500,000 population and Alamo Area Council of Governments CDBG-DR funds post Hurricane Harvey as examples of when city population was deducted from county population before allocation.

For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries. As well, because citizens of Corpus Christi, Robstown, Bishop and other cities pay taxes to both the city and the county, we feel that citizens are not being double counted, rather they are being fully represented.

Our analysis shows that deducting city population from county population does not make a material difference in individual city allocations yet shifts the overall funding towards the northern counties. This leaves the heavily populated Nueces County more vulnerable to disasters. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development

2910 Leopard St. • P.O. Box 9909 • Corpus Christi, TX, 78469 • Main (361) 883-5743 • Fax (361) 883-5749

www.coastalbendcog.org



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

City Manager David Parsons
Port Aransas City Hall
710 W. Ave A
Port Aransas, TX 78373

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear City Manager Parsons:

Thank you for attending the public meeting regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters. Thank you for your thoughtful comments regarding the methodology of allocation.

As we understand, your stated concern was county population was artificially inflated by including city population in the overall county numbers.

For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries. As well, because citizens of Port Aransas, Robstown, Bishop and other cities pay taxes to both the city and the county, we feel that citizens are not being double counted, rather they are being fully represented.

Our analysis shows that deducting city population from county population does not make a material difference in individual city allocations yet shifts the overall funding towards the northern counties. This leaves the heavily populated Nueces County more vulnerable to disasters. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development



Mr. John Buckner

August 25, 2022

Coastal Bend Council of Governments

2910 Leopard Street

Corpus Christi, TX 78408

Dear Mr. Buckner:

The City of Aransas Pass would like to comment on the proposed method of distribution for \$179,547,000 in Community Development Block Grant Mitigation Funds allocated to the Coastal Bend Region to address mitigation needs through the Texas General Land Office (GLO).

Per the Coastal Bend COG's method of distribution, four factors were used in allocating funding: The percentage of land in a 100 year flood plain, the number of times a community has experienced a federally declared disaster, population and the social vulnerability index.

Population is weighted at 50% in the allocation formula using the 2019 American Community Survey 5 year estimates. However, data used for population in each of the counties included the entire county population, not just the population of unincorporated areas. This resulted in double counting of certain segments of population in the region causing most counties to have inflated allocations.

The City of Aransas Pass recommends adjusting population values to remove populations within the jurisdiction of cities from the population represented for each county. County population numbers should reflect unincorporated areas only. This proposed change would result in a fair distribution on an equal per capita basis. In addition, communities not receiving an allocation of funds separate from their county should not have a separate weighted factor in the total calculation. The population of those communities should simply be counted in the county population.

Thank you for the opportunity to comment on the provisionally approved CBCOG method of distribution for the CDBG-MIT regional mitigation program. If you have any questions feel free to contact my office.

Sincerely,

Gary Edwards,

City Manager, Aransas Pass, Texas.



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

City Manager Gary Edwards
City of Aransas Pass
600 W Cleveland Boulevard
Aransas Pass, TX 78336

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear City Manager Edwards:

Thank you for attending the public meeting regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters. Thank you for your thoughtful letter regarding the methodology of allocation.

As we understand, your stated concern was county population was artificially inflated by including city population in the overall county numbers. In addition, you recommended a different methodology for allocating funds to smaller communities.

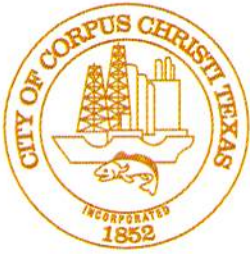
For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries. As well, because citizens of Aransas Pass, Portland, Sinton and other cities pay taxes to both the city and the county, we feel that citizens are not being double counted, rather they are being fully represented.

Our analysis shows that changing methodology does not make a material difference in individual city allocations yet shifts the overall funding towards the northern counties. This leaves the heavily populated Nueces County more vulnerable to disasters.

I'm available to meet with you at your convenience if you have any additional concerns. Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development



August 25, 2022

John P. Buckner
Coastal Bend Council of Governments
2910 Leopard Street
Corpus Christi, TX 78408

Peter Zaroni
CITY MANAGER

PO Box 9277
Corpus Christi
Texas 78469-9277
Phone 361-826-3220
Fax 361-826-3839
Peterz@cctexas.com
www.cctexas.com

Dear Mr. Buckner,

On behalf of the City of Corpus Christi, I am writing to comment on the Provisionally Approved Method of Distribution for \$179,547,000 in Community Development Block Grant Mitigation Funds allocated to the Coastal Bend Region to address mitigation needs through the Texas General Land Office.

Per the Coastal Bend COG's Method of Distribution summary form, four factors were used in allocating funding: population, the social vulnerability index, the percentage of land in a 100-year flood plain, and the number of times a community experienced a federally declared disaster. The population is weighted at 50% in the allocation formula using the 2019 American Community Survey five-year estimates as its dataset. However, data used for the population in each of the counties included the entire county population, not just the population of unincorporated areas. This resulted in double counting of certain segments of the population in the region, causing most counties to have artificially inflated allocations.

The City of Corpus Christi recommends adjusting population values to remove populations within the jurisdiction of cities from the population represented for each county. County population numbers should reflect unincorporated areas only. This change will result in a fair distribution on an equal per capita basis.

In addition, communities not receiving an allocation of funds separate from their county should not have a separate "weighted factor" in the total calculation. The population of those communities should simply be counted in the county population. This would allow the limited funding available to be applied to projects that mitigate disaster impact for the largest population area possible.

There is precedent for this population distribution in looking at the methodology used by the State of Texas for distributing CARES Act COVID-19 funding to jurisdictions under 500,000 in population. Attachment 1 represents the spreadsheet showing allocation by population for each city and county in the state and does not double the county population for residents in the jurisdiction of cities. In 2018, the Alamo COG distributed CDBG DR funds after Hurricane Harvey; the Local infrastructure distribution population numbers follow a similar pattern. Attachment 2 includes the Alamo COG Local Infrastructure distribution on page 17.

The table below illustrates several projects in the City of Corpus Christi that meet the requirements of the CDBG-MIT Program.

Project	Amount
Downtown Pump Stations/Drainage Improvements	\$5.9 Million
Back-Up Generators for Corpus Christi Wastewater Infrastructure	\$6.4 Million
Greenwood Flood Mitigation and Emergency Generator	\$11.5 Million
Oso Creek Bottom Rectification and Green Infrastructure	\$45.8 Million
Williams Ditch/Oso Bay Basin Flood Mitigation	\$26.3 Million
TOTAL	\$95.9 Million

Thank you for the opportunity to comment on the Provisionally Approved CBCOG Method of Distribution for the Community Development Block Grant – Mitigation (CDBG-MIT) Regional Mitigation Program (COG MOD). If you have any questions or need additional information regarding the information included in these comments, please reach out to Tammy Embrey, Director of Intergovernmental Relations, at tammye@cctexas.com or 361-826-3622.

Sincerely,



Peter Zanoni
City Manager

CC: Heather Lagrone, Texas General Land Office

Attachment

1. COVID-19 Funding Allocations for Texas Jurisdictions
2. AACOG-CDBG DR MOD 2018

Attachments to the City of Corpus Christi Comment may be found here:

Attachment 1:

<https://coastalbendcog.org/sites/default/files/2022-10/Public%20Comment%20CC.1.pdf>

Attachment 2:

<https://coastalbendcog.org/sites/default/files/2022-10/Public%20Comment%20CC.2.pdf>



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

City Manager Peter Zanoni
City of Corpus Christi
P.O. Box 9277
Corpus Christi, TX 78469-9277

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear City Manager Zanoni:

Thank you for your thoughtful letter regarding the methodology of allocation for the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern was county population was artificially inflated by including city population in the overall county numbers. In addition, you recommended a different methodology for allocating funds to smaller communities. You cited CARES Act allocation by the State of Texas for jurisdictions under 500,000 population and Alamo Area Council of Governments CDBG-DR funds post Hurricane Harvey as examples of when city population was deducted from county population before allocation

For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries. As well, because citizens of Corpus Christi, Robstown, Driscoll, and other cities pay taxes to both the city and the county, we feel that citizens are not being double counted, rather they are being fully represented.

Our analysis shows that changing methodology does not make a material difference in individual city allocations yet shifts the overall funding towards the northern counties. This leaves the heavily populated Nueces County more vulnerable to disasters. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development

North Beach Erosion Protection

El Rincon Breakwater Oyster Reef and Habitat

The Living Shorelines of Texas

Website: www.TheLivingShorelinesOfTexas.com

Historical

1831: Captain Enrique Villarreal was the recipient of a large grant of land called Rincón del Oso, which included part of the shores of Corpus Christi Bay and the site of what is Nueces County, Corpus Christi. History indicates he was the first title holder of this land including North Beach.

Early 1800's:

- Historic Reef Road (comprised of oyster shells) connected Nueces County (from North Beach) to San Patricio County (Indian Point); this road was used by native Indians and other travelers. In 1865, the Nueces County Commissioners Court ordered posts be placed along the reef to mark the road and to warn ships of its existence.
- North Beach was the first location in Texas to fly the United States of America flag.

1845: General Zachary Taylor along with one half of the entire US Army, estimated at 4500, camped on North Beach.

1905: Spohn Sanitarium built on North Beach with funds contributed by the Kenedy, King, Kleberg and other leading citizens. It was named in honor of Dr. A. E. Spohn.

1909: President Taft played the first round of golf at the newly built North Beach Country Club.

1917: First Splash Day held which became Buc Days.

1990: Texas State Aquarium opens to the public. Visitor counts have been as high as 550,000.

1992: The USS Lexington found a permanent home on North Beach after many trips to the area.

Visitor counts have been as high as 300,000.

Current Use

- North Beach has been a hot tourist destination for over 100 years and has created innumerable happy memories.
- Positive economic impact on area businesses is significant.
- North Beach is home to the largest beach on Corpus Christi.
- Free access to beach for surrounding communities; provides family fun at no to low cost.

Impact and need for breakwater

- First and foremost, the protection of a National Treasure, the USS Lexington. The erosion at bow and portside must be mitigated.
- Protection of North Beach, the beach has been renourished four times and is in need of a fifth.
- The breakwater would lessen the impact of wave, wind and soil erosion.
- Protection of shoreline properties, including hotels and businesses as well as citizen owned condominiums and homes.
- The breakwater would benefit families by providing a safer and calmer play/swim environment.
- It would also create a lasting bay habitat for oysters and other marine life.
- It is our Legacy, lets honor North Beach by protecting it for future generations.



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Peter M. Davidson
Marine Consultant
111 Lost Creek Drive
Portland, TX 78374

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Mr Davidson:

Thank you for your thoughtful comments regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is the need for a Living Shoreline.

The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary when considering disaster-resilient infrastructure, as disaster knows no boundaries.

Once the funding has been allocated, it is up to each community to determine how to use their allocation to benefit their citizens. Coastal Bend Council of Governments is not part of the decision-making process when it comes to which projects will receive funding.

We are working closely with our Cities and Counties to ensure they are aware of initiatives such as this, and the benefits of leveraging shared resources to benefit the region. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you for your continued support of the work we do here at CBCOG!

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development

Dear Coastal Bend Council of Governments,

August 16, 2022

I'm writing to ask you to recommend allocating \$15 million in funding from the \$179,547,000 in Community Development Block Grant Mitigation Funds for Hurricane Harvey Impacted Communities to pay for construction of a **Living Shoreline Breakwater** off the shore of North Beach.

I am a North Beach resident, property owner, and a board member of the North Beach Community Association, a neighborhood organization dedicated to improving this area. My husband and I have lived in our beach cottage on North Beach for the past 20 years. We've raised our son here, who is now in high school. We own and operate an ecotourism kayak touring business, so both our home and our business rely on the continued success of this tourist beach and our healthy bay ecosystem. As a family, we windsurf and kiteboard on North Beach, so we are very familiar with the bay waters here and understand how destructive that wave action and ship wakes can be to our beach.

In 2002, I watched the GLO's North Beach Nourishment Project take place here. In 2016, I watched that Beach Nourishment Project from start to finish. So I have learned first-hand the high cost to the taxpayer and the large disruption to the beach businesses and residents caused by these recurring nourishment projects.

I came up with the idea of building a North Beach breakwater back in 2013. I got the idea from looking at the existing rocky breakwater just across the ship channel that has been protecting the Corpus Christi Downtown and Marina for about almost 100 years now. The government built that breakwater in 1925, and it's still protecting the Downtown seawall and marina today. Surely, now in the 21st century, we can do the same or better to protect North Beach. The breakwater concept for North Beach was first published in our neighborhood newsletter in 2014 here - <https://www.thirdcoastphoto.com/nbca/newsletter/2014may.html#erosion>

To promote the breakwater concept, our neighborhood group created a PowerPoint and presented it the City of Corpus Christi's Watershore and Beach Advisory Committee, then brought it to City Council. A few years later, in 2018, the city awarded \$250,000 to study the North Beach Breakwater concept and create a preliminary design done by the engineering firm Mott MacDonald.

This CBDG Mitigation funding, if allocated for this project, will build on the city's previous investment, which was made based on an idea initiated by the residents who actually live here on North Beach.

The entire peninsula called North Beach is categorized by FEMA as being a Velocity 22 Zone, which is one of the most vulnerable places to live due to storm surge and the resulting erosion and damage to public and private properties. Building a breakwater in the bay running parallel to our beach will help protect our homes, our businesses and

our shoreline. North Beach offers a wide variety of housing, from high-priced condo units on the beach to moderately priced studio apartments, budget hotels, single family beach cottages and low-income substandard housing in the blighted neighborhood west of the old bridge. People of all economic levels live here together. The visitors to our beach likewise come from a variety of economic levels. Since this is a free beach with no beach permit required, many low-income families from Corpus and all the way to San Antonio choose to come here to avoid that \$12 pass.

Like most beach communities, all new construction here is built up on pilings, but hurricanes and storm surge are still a threat to our neighborhood. Constructing the breakwater to protect our beach and our community is important to protect our homes. But that threat is even more pronounced when you consider that sea level rise and climate change are projected to bring even more destructive storms that will put our beach, our residential and business properties even more at risk of damage. In addition, the completion of new Harbor Bridge will make way for bigger ships to sail into our port, resulting in larger vessels plowing through the bay that throw up even larger destructive ship wakes onto our beach. A breakwater would help reduce all of these impacts, as well as provide new habitat for the wide variety of marine life, sea grasses, oysters and birds.

A potpourri of people utilizes North Beach every day. We get hundreds of thousands of annual visitors coming to the USS Lexington and Texas State Aquarium. Our residential households represent hundreds of family units. And many more work in our city's thriving tourism economy here on North Beach.

You can help all these people, as well as improve marine life habitat, by allocating \$15 million of the funding to this important "Living Shoreline Breakwater" project. A breakwater will help ensure the continued success of this multifaceted beach community located in one of the city's most historic areas.

Respectfully,

Carrie Meyer

Home owner: 4401 Gulfbreeze Blvd. , Corpus Christi TX 78402

Board member: North Beach Community Association

North Beach resident: 20 years

northbeachcommunity@gmail.com

361-442-0628

To: Mayor Joe McComb and all City Council members
CC: City Manager Peter Zaroni

September 4, 2019

Dear Elected Leaders and City Manager,

Building a breakwater off the shore of North Beach is a concept that North Beach Community Association has been promoting for more than five years now. As property owners facing the impact of a hurricane, a breakwater could mean the difference between surviving with minor damage and suffering a total loss. Breakwaters will help reduce storm surge and also help maintain and stabilize our beach, which is our first line of defense during a storm.

The breakwater is not a new idea. An archived article from NBCA's newsletter from September 2014 shows how our organization requested that the city apply for a Coastal Erosion Planning & Response Act grant from the Texas General Land Office to study a breakwater. Year after year, the city put other projects ahead of ours and never did apply for that grant.

So when the \$250,000 bond proposition was approved in November 2018 to fund preliminary engineering and permitting of new breakwater barriers on North Beach, we felt like our request had been finally granted and our hard work rewarded by our fellow citizens who voted to support it.

As we plan for improvements to North Beach, there are several studies underway. This breakwater study is different from the privately funded Lloyd study, which was conducted to assist and enhance the bond project, not to replace it. The proposed canal project is completely separate from this bond, as the breakwaters will provide shoreline protection while the canal will provide drainage.

As our elected leaders, we ask that you authorize this \$250,000 in bond funding and get the engineering underway to explore a way to mitigate beach erosion and coastal flooding through offshore breakwaters for North Beach.

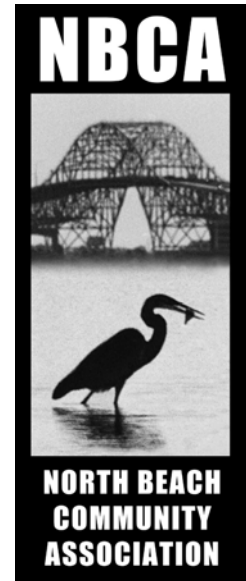
Thank you,

North Beach Community Association
Board of Directors

Kim Novak, President
Barbara Welder, Vice President
Michael Kennedy, Treasurer
Carrie Meyer, Secretary
Bob Catalano
Dolores Vela
Ron Graban

North Beach Community Association
PO Box 2361 · Corpus Christi, TX · 78403

*Encouraging the development and preservation of North Beach and
working to create a safe and environmentally sound neighborhood*



North Beach News

Newsletter of the North Beach Community Association

May 2014

Finding solutions for shoreline erosion on North Beach

Coastal hydrographer David Mills gave a presentation to NBCA in April about historic shoreline erosion on North Beach. Mills, who works for a surveying company called [Terrasond Ltd.](#), showed a series of historical maps that illustrate the evolution of North Beach's shoreline over the years, which has experienced a recurring pattern of erosion, renourishment, erosion, renourishment.



These two maps show how, in only two short years, sand can be swept from the south end of the beach to the north end near the jetty.

(Click to enlarge map)

"Beach renourishment," the practice of moving sand from one place to another and/or bringing in more sand, is a "soft" erosion control technique that the city has utilized four times over the past three decades, each project costing millions of taxpayer dollars. The first and biggest renourishment took place in 1978 when 800,000 cubic yards of sand was added to the beach. The second was in 1985 and involved 30,000 cubic yards of sand. In 1998, 23,000 cubic yards of sand was moved. And in 2001, 150,000 cubic yards of sand was moved. Today, the section of the Beachwalk near the Lexington is only feet from the water's edge and a row of shade structures near the south end of the beach are standing in saltwater.

► [North Beach Historical Maps](#)

The city's Parks & Recreation Department, which manages the beach through a contract with the

Texas General Land Office (GLO), is in the process of planning another beach renourishment project to remedy the problem. Stacie Talbert, Assistant Director, plans to give a presentation about the project to the NBCA Board this summer. The city hired HDR Engineering to do the renourishment design, which is the first step. Hopefully, sand will be moved in before that section of the Beachwalk is underwater.

Instead of moving sand again and again, a more permanent, albeit more expensive, solution to erosion control is to install "hard" features that prevent or greatly reduce erosion. An example is North Beach's north jetty (or terminal groin) that was built in 1985, around the same time that the tall condos and canal-front homes were being built on North Beach.

When the [North Beach Development Plan](#) was updated in 2011, one of the additions was the plan to extend the existing north jetty farther eastward into the bay. The reason is that, as sand builds up on the jetty's south side, the structure's carrying capacity is reduced and sand is able to drift around it instead of being trapped by it. The development plan also shows, construction of a second jetty, farther to the north near the RV Park, to trap sand which would help increase the size of the beach between the two jetties. These projects are not funded yet but have been vetted and approved by City Council as legitimate ideas to plan for.

Another idea for a hard erosion



control measure, which is being discussed by North Beach residents and business owners, is the construction of a rocky breakwater running parallel to shore, similar to the one that protects the Corpus Christi Marina and the Bayfront. Although the initial costs would be much higher than just bringing in more sand, it would be a longer-lasting solution and, thus, be an investment that ultimately would save taxpayers money.

An added bonus is that a breakwater, by reducing wave action, would create a large area of calm water between it and the beach, providing ideal conditions for learning water sports such as windsurfing, kite boarding, kayaking and dinghy sailing. That would fuel economic development by bringing water sports enthusiasts to North Beach and by creating a new venue for instructional outfitters to set up and teach. (Teaching water sports along the bayfront is challenging due students getting pushed by the wind into the concrete seawall.)

The North Beach Breakwater would be placed only along the south half of the beach where erosion occurs, leaving the north half of the beach as it is now for those beach goers and condo residents who prefer to have waves breaking on the shore. So you'd have the best of both worlds, all on one beach. One possible source of material for the breakwater is to reuse large pieces of concrete from the old Harbor Bridge when it is dismantled.

The GLO offers funding for coastal erosion response projects through its [Coastal Erosion Planning and Response Act \(CEPRA\)](#) Program. The application deadline for the next round of funding under that grant is in July and local governments, homeowners associations or private entities can apply as project partners.

During his presentation to NBCA, Mills noted that water is powerful and erosion is difficult to prevent or stop. One of the most cost-efficient steps towards preventing erosion that we as a community could take right now is to keep as much vegetation growing on the sand as possible. "Nothing protects sand like vegetation. The north end of the beach is absolutely beautiful," he said.



Proposed North Beach Breakwater, aimed at providing a long-term solution to beach erosion.
(Click to enlarge map)

North Beach News

September 2014

Newsletter of the North Beach Community Association

City secures emergency funding to repair Beachwalk

A large section of the Beachwalk, the hike and bike path that runs parallel to the shoreline on North Beach, fell into the bay on June 28, right before the busiest weekend of the year on North Beach, the Fourth of July. The collapse was a result of erosion.

In September 2012, NBCA President Carrie Robertson Meyer sent emails and photographs to city staff and City Council, alerting them to the rapid rate of erosion occurring in that area at the south end of the beach. She urged them to shore up the Beachwalk with sand or sand bags until a full-scale renourishment project could be planned. Instead, city leaders applied for state funding for another renourishment project, like the city has done about every 10 years. The last nourishment was done in 2001, costing about \$2 million.

Once the Beachwalk collapsed, emergency funding became available. An [Informal Staff Report](#)

issued by City Manager Ron Olson entitled, "Emergency Repairs," was released on August 6 (about five weeks after the Beachwalk collapse) and included the city's plan of action, a letter to the US Army Corps of Engineers (USACE), engineering plans for the sidewalk repair, photographs, and a topographic survey.

Contractors hired by the city in mid-August used heavy machinery and a large crane to drive PVC sheet piling into the sand landward of the collapsed Beachwalk. Next, they built a 5-foot-wide sidewalk to serve as a pile cap and anchor for the PVC sheet piling. The repair started in late August and, as of September 14, was close to completion.

Meyer and others are recommending that the city conduct a feasibility study to determine if erosion control measures, such as a breakwater running parallel to shore near the Lexington, could prevent or slow the rate of erosion on North Beach. On Sept 4, Meyer presented the idea to the city's Watershore Beach Advisory Committee, which voted unanimously to recommend that the city fund such a study. ^



After erosion caused the Beachwalk to collapse, the city secured emergency funding to repair it.



A breakwater could solve the recurring problem of erosion on North Beach.

PHOTOS: THIRD COAST PHOTO



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Carrie Meyer
4401 Gulfbreeze Blvd.
Corpus Christi TX 78402

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Ms Meyer:

Thank you for your thoughtful comments regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is the need for Breakwater Islands to be constructed on North Beach to protect the sandy 1.5 mile long beach from erosion caused by two factors: 1) seasonal onshore winds and 2) large ship wakes created by ships entering and exiting the Port of Corpus Christi. Engineering studies recently paid for by the city show how a series of breakwater islands constructed in the bay running parallel to shore would protect the beach and shoreline properties from erosional impacts and thus provide a solution for resiliency.

The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary when considering disaster-resilient infrastructure, as disaster knows no boundaries.

Once the funding has been allocated, it is up to each community to determine how to use their allocation to benefit their citizens. Coastal Bend Council of Governments is not part of the decision-making process when it comes to which projects will receive funding.

We are working closely with our Cities and Counties to ensure they are aware of these comments, and the benefits of leveraging shared resources to benefit the region. I'm available to meet with you at your convenience if you have any additional concerns.

Thank you for your continued support of the work we do here at CBCOG!

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive.

Emily Martinez
Director of Regional Economic Development



August 24, 2022

Mary Alfuso, Executive Director
Coastal Bend Council of Governments
2910 Leopard Street
Corpus Christi, TX 78408

Re: CDBG MIT COMMENT

Dear Ms. Alfuso,

The county population totals shown in the proposed MOD are double counted as they include both the county population and the populations of cities within the counties resulting in a skewed distribution to counties. This should be corrected to show only the populations of unincorporated areas within each respective county.

There is precedent for this distribution methodology including:

- The State of Texas distributed CARES Act COVID-19 funding to jurisdictions under 500,000 in population. The distribution was by population for each city and county in the state and did not double-count populations for residents in the jurisdiction of cities.
- The Alamo Area Council of Governments distributed CDBG-DR local infrastructure funding and did not incorporate cities into counties' population count.

Finally, the population of Portland is not 17,807. The correct U. S. Census population is 20,383.

We would appreciate your help in making these important corrections.

Sincerely,

Cathy Skurow
Mayor



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Mayor Cathy Skurow
City of Portland
1900 Billy G. Webb Drive
Portland, TX 78374

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Mayor Skurow:

Thank you for attending the public meeting regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters. Thank you for your thoughtful comments regarding the methodology of allocation.

As we understand, your stated concern was county population was artificially inflated by including city population in the overall county numbers. In addition, you expressed concern regarding the population number used for the City of Portland.

For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries. As well, because citizens of Portland, Mathis, Sinton and other cities pay taxes to both the city and the county, we feel that citizens are not being double counted, rather they are being fully represented.

Our analysis shows that deducting city population from county population does not make a material difference in individual city allocations yet shifts the overall funding towards the northern counties. This leaves the heavily populated Nueces County more vulnerable to disasters.

The population data comes from the 2019 census.gov ACS (American Community Survey) 5 Year Estimates, as provided by GLO.

I'm available to meet with you at your convenience if you have any additional concerns. Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development

2910 Leopard St. • P.O. Box 9909 • Corpus Christi, TX, 78469 • Main (361) 883-5743 • Fax (361) 883-5749

www.coastalbendcog.org



August 25, 2022

Mary Afuso
Coastal Bend Council
Of Governments
2910 Leopard St
Corpus Christi, Texas 78408

Re: The Method of Distribution of \$179,547,000 in Community Development Block Grant
Mitigation Funds for Hurricane Harvey Impacted Communities

Dear Ms. Afuso:

Nueces County Water Control & Improvement District #3 (The District) is a water service provider located in Robstown, Nueces County Texas. Water is an essential commodity in our daily lives, indeed an integral part of any community to survive. The District services over 5,000 connections in the Northwest side of the City of Corpus Christi, the unincorporated part of Nueces County, and the entire City of Robstown. The District is considered a government entity and mostly defined as “other political subdivision”, but is not defined as a municipality nor does it have county jurisdiction.

Because of these reasons, The District is never qualified as eligible to receive any funds to assist with its many infrastructure struggles. Restoring existing water systems as they reach the end of their useful lives and expanding them to serve a growing population will cost at least \$19 million if the District is to maintain current water service levels. And delaying this investment can result in degrading water service, increasing water service disruptions, and increasing expenditures for emergency repairs. Our only course of action will be to increase water rates effecting mostly the City of Robstown that is already economically challenged (*as of the 2020 census, the average household income in Robstown is \$45,713 with a poverty rate of 28.81%*) as well as effecting all its customers. Increasing water rates will affect all customers as a whole, but the District has no other resource for revenues other than the sale of water.

Looking for outside funding is relatively difficult for a water district such as ours, the District provides a required and necessary resource during times of emergencies, natural disasters, etc. since the District can provide water for use in these cases. But when funding is needed for infrastructure, repairs, etc. that is out of the norm, such expenses are deemed ineligible for funding due to the type of entity the District is defined as.

While it would be too much to expect \$19 million in assistance, the District has a project requiring funds in the amount of \$1.5 million for a much needed ground storage tank. All these costs are directly funded by water revenues, and the current financial circumstances we are facing does not allow for extra projects, no matter how needed they may be.



COASTAL BEND
COUNCIL OF GOVERNMENTS

August 30, 2022

Addie Hollers
Nueces County Water Control and Improvement District #3
P.O. Box 1147
501 E Main Ave
Robstown, TX 78380

RE: Response to Public Comment – Coastal Bend Council of Governments MIT-MOD

Dear Ms. Hollers:

Thank you for your thoughtful letter regarding the method of distribution (MOD) for the \$179,547,000 allocated to the Coastal Bend for high impact projects to mitigate future disasters.

As we understand, your stated concern is being excluded from consideration for funding.

For this funding, Coastal Bend Council of Governments did not expand the pool of eligible applicants beyond Counties and Cities with more than two thousand citizens. The GLO Guidelines for this funding require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 3.3). With this in mind, we narrowed the pool of applicants to prevent dividing the funds into several small awards. Such approaches are necessary because they address disaster risk from a watershed perspective, which is critical when considering disaster-resilient infrastructure, particularly to water, which knows no boundaries.

We are working closely with our cities and counties to ensure they are aware of the needs of smaller communities, and the benefits of leveraging shared resources to benefit the region.

I'm available to meet with you at your convenience if you have any additional concerns.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development



Coastal Bend Council of Governments

Final Submission to General Land Office

UPDATES

IN RESPONSE TO PUBLIC COMMENTS

No updates were made in response to public comments

Custom	Please rank by importance: what is the best use of \$1,000,000 in your community?							Other (Please Comment)	Please email	If you would like a written response, please provide your contact information.	
	1	2	3	4	5	6	7				
	1	2	6	7	5	4	3	Water infrastructure improvements for aged or degraded pipelir	77389		
	1	3	6	4	5	2	7		78102	Jung-Han (John) Cher	
								people living in flood prone areas know what needs to done. County comm. need to listen, and ACT! not just politics as usual. I have complained about three floods in this area over last 6 years. nothing has been done! where is the money spent?	78102	David T. Miller	N/A
	1	2	3						78102		
	5	1	7	4	2	3	6		78132	Michael Meek	Aransas C
	4	2	5	1	6	3		MOST IMPORTANT: City of Corpus Christi planning to address inevitable sea level is missing. This conversation is not taking place in our community. THE TALK must begin. It is not favored by real estate interests. No single mitigation strategy is the answer. It will take a combination of many steps to protect life and property, including moving away from shore side locations ("managed retreat"). Real estate agents will resist that talk. The City has much of its tax base dependent on reside			
								locations at 3' elevation.	78230	Sally Clark Farris	retired, as
	2	3	7	4	6	5	1	Replace water lines in our colonia areas that have been impacted by severe flooding. These lines are dilapidated and need replacing.	78332	Margie H. Gonzalez	Jim Wells
	1	2	5	3	4				78336	...Live in Aransas County	
	1	2	4	3	5	6	7	Personal Property Resilience Assistan	78336	Kimberly Henry	City of Ro
	2	1	3	4	5	6		The drainage in our town is flooding our sewer system causing over flow of sewage.	78340	Mayor Donna Easton	Town Of E
									78358		
	2	3	4	1	6	5	7	Preserve and maintain permeable surfaces so water can drain the way Nature designed.	78358	Ethelyn Kuldell	.
	4	2	3	5	6	7		We are a very small city and rely almost solely on property taxes for our budget. do projects to improve drainage, erosion and flood control are very expensive and for the most part out of our range.	78362	Ann R Nyberg	
	2	1	3	5		4			78362	Jodi Cari	City of Ing
	3	1	4	6	7	5	2	Storm sewer; lift stations; waste water treatment plant	78362	Tom Daley	
	2		1			3		Live on Corpus Christi bay we need to save our shore and control pollution coming from ship traffic. Some days it's unbearable to even go outside.	78362	Suzi	
	2	1	3	4		5			78362	Jo Ann Ehmanr	City of Ing
	3	1				2			78362	Sheila Waltor	
	1	2	5	7	6	4	3	Ingleside on the Bay needs funds to get a resilient comprehensive in place	78362	Brenda Duncan	
	2	1	4	7	6	5	3	Four city blocks of aging asbestos main water line			
								Sewer and water, it is my understanding we will soon not have sewer access			
		2					1	Ingleside does not want to provide it to Ingleside On The Bay any longer	78362	Marietta Grimes	
	1	3	5	6	7	2	4	Resiliency Planning	78362	Jennifer R Hilliar	
								Road surfacing. As part of drainage, the shape and construction of road surfaces is critical to controlling drainage and funds need to be allocated to road surfaces.	78363	Mark McLaughlin	City of Kin
	3	2	6	4	7	5	1		78363		
	2	1	3	5	6	4	7	N/A			
								Water/wastewater infrastructure	78363	Joe Casilla	City of Kin
	5	7	1	3	4	2	6	Water & Wastewater Improvement:	78363	Joseph Ramire:	Kingsville,
	2	1	6	7	4	5	3	Water / Wastewater	78363		
	3	2	4	7	5	6	1	Replacement of old water line	78363	Cameron Wayne Whittington	City Of Kin
								Most municipalities have infiltration into their sanitary sewer systems during heavy rainfalls causing an accelerated deterioration of older pipes. Funds are needed to			
	2	6	4				3	replace underground aging utility infrastructure. Thanks	78363	William Donnell	City of Kin
	4	1	3	6	5	2	7		78363		
	5	1	4	2	6	3			78363	Tanya Colir	City of Kin
	6	7	5	1	4	3	2	Tree preservator	78363	Kobby Agyekum	City of Kin
	5	1	7	3	4	6	2	Downtown Revitalization (Action Area)	78363	Uche Echeozo	City of Kin
	1	2	3	7	4	5	6	Water and Wastewater Improvement:	78363	Rutilio P. Mora Jr	City of Kin
									78363	Robert F Vill	TAMUK M

5	4	3	2	7	6	1 Emergency Management, Community Operation Shelter, Community Center	78368 Paul Pulley	City of Ma
3	1	4	2	5	6	7	78370	
3	4	2	5	7	6	1 Shoreline Protection	78373	

If one oyster can filter up to 50 gallons of water each day and sequester 89 gram carbon per year, what do you think Living Shoreline of 2 billion+ oysters (*not for eating) can do to improve Erosion Control, Water Quality, Habitat Creation, Sport Fishing, and protect our National Historic Landmark the USS Lexington in front of North Beach in Corpus Christi Bay? We have a once-in-a-lifetime opportunity to leverage this specific grant funding with multiple private sector funding sources. know grant funding is competitive and limited. To maximize the greatest benefit the greatest positive outcome, we must leverage each and every single grant dol to multiply our efforts. We are proud to share with you that the Ed Rachal Foundation and possibly other similar entities are stepping up to provide partnership funding and in-kind matches of over \$31,000,000! The \$31,000,000+ matches include the creation of new research facilities to create oyster reef habitat in 5 bays along the Texas coast. The flagship research facility will be built on North Beach. Not only is there a substantial financial match but the research facility participation will directly enhance the longevity and lasting success of this grant funded Living Shoreline. Combining the research facility's innovative methods to enhance oys growth within a Living Shoreline barrier will help the oysters filter up to 100,000,000,000 (billion) gallons of water each day and sequester up to 178,000,000,000 (billion) grams of carbon each year in Corpus Christi Bay. We cannot stress enough the magnitude of this project that will greatly improve water quality, sequester carbon, create much needed habitat, improve sport fishing, protect the constantly eroding North Beach shoreline and protect our National Historic Landmark USS Lexington from the existing erosion putting her at risk. We fully support the Coastal Bend Council of Governments recommending this Living Shoreline project to the Texas General Land Office and are ready to fully assist as

3	4	2	7	5	6	1 "Partners in the Process."	78374 Karren Marshall	
---	---	---	---	---	---	------------------------------	-----------------------	--

with many people through the last several years who also support a transformative project that creates a Living Shoreline in Corpus Christi Bay, in front of North Beach. You may get several comments that coincide as we all stand ready to assist as "Partners in the Process." Yours truly, Peter Davidson Ed Rachal Foundation. If one oyster can filter up to 50 gallons of water each day and sequester 89 grams of carbon per year, what do you think Living Shoreline of 2 billion+ oysters (*not for eating) can do to improve Erosion Control, Water Quality, Habitat Creation, Sport Fishing, and protect our National Historic Landmark the USS Lexington in front of North Beach in Corpus Christi Bay? We have a once-in-a-lifetime opportunity to leverage this specific grant funding with multiple private sector funding sources. know grant funding is competitive and limited. To maximize the greatest benefit the greatest positive outcome, we must leverage each and every single grant dol to multiply our efforts. We are proud to share with you that the Ed Rachal Foundation and possibly other similar entities are stepping up to provide partnership funding and in-kind matches of over \$31,000,000! The \$31,000,000+ matches include the creation of new research facilities to create oyster reef habitat in 5 bays along the Texas coast. The flagship research facility will be built on North Beach. Not only is there a substantial financial match but the research facility participation will directly enhance the longevity and lasting success of this grant funded Living Shoreline. Combining the research facility's innovative methods to enhance oys growth within a Living Shoreline barrier will help the oysters filter up to 100,000,000,000 (billion) gallons of water each day and sequester up to 178,000,000,000 (billion) grams of carbon each year in Corpus Christi Bay. We cannot stress enough the magnitude of this project that will greatly improve water quality, sequester carbon, create much needed habitat, improve sport fishing, protect the constantly eroding North Beach shoreline and protect our National Historic Landmark USS Lexington from the existing erosion putting her at risk. We

3	4	2	7	5	6	1	fully support the Coastal Bend Council of Governments recommending this Living	78374	Peter Davidson	Ed Rachal
5						7	Water Utilities:	78380	Addie Salinas-Holler	Nueces Cc
3	4	7	1	6	5	2	Home Weatherization Assistanc	78380		
3	1	2	4	6	5	7		78382		
3	1		2	4				78382		
4	2	5	1	6	3			78382	Barbara Gurtner	
1	2	4	5	6	3			78382		
1	2	3	4	7	5	6		78382		
5	4	3	7	2	1			78382	Don Shepard	

More pro-active approach when approving new construction that may impede natural water run off, possible creation of new flood zones due to construction of any kind and detailed documentation that provides flood mitigation in the event that new flood zone areas may be created. New development of road ways, high ways, housing and commercial should not be considered in existing flood zones without mitigation plans clearly defined.

4	1	2	3			5		78382	Nancy Bolting	
2	3	1	4	6	5			78382		
4	3	5	1	6	2			78382	dean driver	
3	6	4	2	7	5	1	Repaving roads. There are too many rough roads and hole	78382	Shanda Bohannor	
2	1	4	3	5	6	7		78382	Susan Benson	The Cart S
2	3	5		4	1			78382		
3	1	4	5		2			78382		
2	1	3	5	7	6	4	Preservation of wetland	78382	Deborah Shedden	
2	3	4	1	5	6			78382		
2	1	3	4	6	5	7		78382	Ramona Day	2802 LATI
4	5	3	2			1	Clean ditches. Mine haven't been done in over 10 years so water does not drain.	78382	Dorothy Ablanedo	
2	1	4	6	5	3	7		78382		

3	2	1	4	6	5	7	78382 Nick Noonan	
2	1	4	6	5	3	7 Most important us prevent water from damaging homes and business	78382	
3	1	2	5	6	4		78382	
2	1	3	4	6	5		78382 Larry Doonan	Doonan P
2	1	5	4	7	3		78382	
2	1	3	5	6	4		78382	
1	2	3	6	5	4		78382	
3	4			1		2 larger culverts at low water crossing potable water distribution system rehabilitation and domestic sewer syst	78387 Commissioner Ken Haggart	Bee Count
5	3	6	2	7	4	1 integrity study and rehabilitation	78393 Robert E Blaschke	Refugio Co
3	4	5	6	2	1		78401	
1	2	3					78401	

The Museum of Science & History's facility, exhibits, and collections are owned by the City of Corpus Christi. The Corpus Christi Museum of Science and History Museum houses millions of artifacts from dinosaurs to sunken ship treasures, numerous artifacts, natural science, and biological specimens in its 40,000sf of archival space throughout the museum. In addition to the city-owned artifacts, the museum is the state repository for all marine archeology. Included in the state collection are artifacts from Lasalle's Labelle ship that are owned by France and in our care. The Museum is accredited by the American Alliance of Museums, the gold standard for museum and collection care and management. Under our accreditation and best practices, the artifacts must be in a climate-controlled environment, free from concern from natural disasters. As the Museum is located along the Port-channel in a low, flood plain, the archives are not adequately protected. Under the Community Development Block Grant Mitigation Funds, the museum seeks funding to move its archives and properly store them in museum-appropriate shelving and storage systems that are protected from a natural disaster.

1	2	4	5	7	6	3	78401 Carol Rehtmeyer	Friends of
---	---	---	---	---	---	---	-----------------------	------------

If one oyster can filter up to 50 gallons of water each day and sequester 89 gram carbon per year, what do you think Living Shoreline of 2 billion+ oysters (*not for eating) can do to improve Erosion Control, Water Quality, Habitat Creation, Sport Fishing, and protect our National Historic Landmark the USS Lexington in front of North Beach in Corpus Christi Bay? We have a once-in-a-lifetime opportunity to leverage this specific grant funding with multiple private sector funding sources. know grant funding is competitive and limited. To maximize the greatest benefit the greatest positive outcome, we must leverage each and every single grant dol to multiply our efforts. We are proud to share with you that the Ed Rachal Foundation and possibly other similar entities are stepping up to provide partnership funding and in-kind matches of over \$31,000,000! The \$31,000,000+ matches include the creation of new research facilities to create oyster reef habitat in 5 bays along the Texas coast. The flagship research facility will be built on North Beach. Not only is there a substantial financial match but the research facility participation will directly enhance the longevity and lasting success of this grant funded Living Shoreline. Combining the research facility's innovative methods to enhance oys growth within a Living Shoreline barrier will help the oysters filter up to 100,000,000,000 (billion) gallons of water each day and sequester up to 178,000,000,000 (billion) grams of carbon each year in Corpus Christi Bay. We cannot stress enough the magnitude of this project that will greatly improve water quality, sequester carbon, create much needed habitat, improve sport fishing, protect the constantly eroding North Beach shoreline and protect our National Historic Landmark USS Lexington from the existing erosion putting her at risk. We fully support the Coastal Bend Council of Governments recommending this Living Shoreline project to the Texas General Land Office and are ready to fully assist as

3 4 2 7 5 6 1
 1 2 4 6 5 3 7

"Partners in the Process."

78404 Chad Magill
 78408 Scott Harris

LAN. Inc.

If one oyster can filter up to 50 gallons of water each day and sequester 89 gram carbon per year, what do you think Living Shoreline of 2 billion+ oysters (*not for eating) can do to improve Erosion Control, Water Quality, Habitat Creation, Sport Fishing, and protect our National Historic Landmark the USS Lexington in front of North Beach in Corpus Christi Bay? We have a once-in-a-lifetime opportunity to leverage this specific grant funding with multiple private sector funding sources. know grant funding is competitive and limited. To maximize the greatest benefit the greatest positive outcome, we must leverage each and every single grant dol to multiply our efforts. We are proud to share with you that the Ed Rachal Foundation and possibly other similar entities are stepping up to provide partnership funding and in-kind matches of over \$31,000,000! The \$31,000,000+ matches include the creation of new research facilities to create oyster reef habitat in 5 bays along the Texas coast. The flagship research facility will be built on North Beach. Not only is there a substantial financial match but the research facility participation will directly enhance the longevity and lasting success of this grant funded Living Shoreline. Combining the research facility's innovative methods to enhance oys growth within a Living Shoreline barrier will help the oysters filter up to 100,000,000,000 (billion) gallons of water each day and sequester up to 178,000,000,000 (billion) grams of carbon each year in Corpus Christi Bay. We cannot stress enough the magnitude of this project that will greatly improve water quality, sequester carbon, create much needed habitat, improve sport fishing, protect the constantly eroding North Beach shoreline and protect our National Historic Landmark USS Lexington from the existing erosion putting her at risk. We fully support the Coastal Bend Council of Governments recommending this Living Shoreline project to the Texas General Land Office and are ready to fully assist as

3	4	2	7	5	6	1	"Partners in the Process."	78410	Carolyn Vaughn	
1	2	4	3	5	6	7	Public education; property and rental insurance	78410		
2	1	3	6	5	4			78411		
2	1	5	3	6	4	7		78411		
				7	5			78411	Veronica Vasquez Arisp	Student/ I
3	2	5	1	6	4	7	fix potholes:	78411	Mary Z. Afusc	

If one oyster can filter up to 50 gallons of water each day and sequester 89 gram carbon per year, what do you think Living Shoreline of 2 billion+ oysters (*not for eating) can do to improve Erosion Control, Water Quality, Habitat Creation, Sport Fishing, and protect our National Historic Landmark the USS Lexington in front of North Beach in Corpus Christi Bay? We have a once-in-a-lifetime opportunity to leverage this specific grant funding with multiple private sector funding sources. know grant funding is competitive and limited. To maximize the greatest benefit the greatest positive outcome, we must leverage each and every single grant dol to multiply our efforts. We are proud to share with you that the Ed Rachal Foundation and possibly other similar entities are stepping up to provide partnership funding and in-kind matches of over \$31,000,000! The \$31,000,000+ matches include the creation of new research facilities to create oyster reef habitat in 5 bays along the Texas coast. The flagship research facility will be built on North Beach. Not only is there a substantial financial match but the research facility participation will directly enhance the longevity and lasting success of this grant funded Living Shoreline. Combining the research facility's innovative methods to enhance oys growth within a Living Shoreline barrier will help the oysters filter up to 100,000,000,000 (billion) gallons of water each day and sequester up to 178,000,000,000 (billion) grams of carbon each year in Corpus Christi Bay. We cannot stress enough the magnitude of this project that will greatly improve water quality, sequester carbon, create much needed habitat, improve sport fishing, protect the constantly eroding North Beach shoreline and protect our National Historic Landmark USS Lexington from the existing erosion putting her at risk. We fully support the Coastal Bend Council of Governments recommending this Living Shoreline project to the Texas General Land Office and are ready to fully assist as

3	4	2	7	5	6	1 "Partners in the Process."	78412	Bob Jones	
4	3	5	2	6	7	1 Better roads. For all neighborhoods. Not just the wealthy o	78412		
3	2	4	5	7	6	1 Invest in wetland preservation. Stop urban sprav	78412	Isabel Araiz:	For the Gr
2	1	5	4	3	6		78414		
1	2	5	6	4	3		78414		
3	2	1	5	6	4		78414	Tracey Cantu	
4	5	6	1	2	3		78414	Robert Morale:	Coastal Be
7	6	4	1	2	5	3 Fix Roadways	78415		
2	1	4	3	7	5	6 Libraries, parks, making Corpus ADA compliar	78415		
2	1	5	3	6	4		78418		
						Water Quality, elevated homes, acquisition of land in high risk area, open spr			
						preservation, planning support	78418		
5	1	2	6	4	3		78418	Rebecca Ramos Taylor	
						include water quality protection measures in flood mitigation management pl			
						and in the scoring system to allocate funds. At a minimum, ensure that flood			
7	6	5	1	2	3	4 projects do not generate downstream impacts.	78620	Tom Hegemier	Doucet an

Flood Pre Improved Erosion C Broadbar New Brid Raised R Other (Li: Open-Ended Response) Open-En Name Company

2.770115 2.348837 3.833333 4.08642 5.177215 4.308642 4.262295

Preventic n	Improvce Drainage	Erosion Control	Broadbar d Access	New Bridges	Roadway s	(List below)
2	1	3	4	7	6	5

CBGOD Community Block Grant Mitigation Public Comments

Addie Salinas-Hollers <asalinas@nueceswater3.com>

Tue 3/8/2022 3:28 PM

To: Mary Afuso <mary@coastalbendcog.org>

Good afternoon Mary,

I have spoken to you on the phone prior to the first planning session that was held on the above referenced subject. I did not join the meeting in person but I attended via Zoom. I want to say I thoroughly enjoyed our brief conversation. The meeting answered important questions and allowed input for the Community Block Grant Mitigation.

We are requesting that water infrastructure be considered in the COG MOD.

We are a water district that services an area comprised of three different sectors. Our CCN and service area allows the district to provide potable and raw water to the City of Robstown, some of the northwest part of the City of Corpus Christi and undeveloped areas of Nueces County. Our district is neither a municipality nor is it county but we are a political subdivision, none the less. Having water service available during a crises is of paramount importance.

If you have any questions, please feel free to contact me to discuss.

Thank you, you are appreciated,

Addie Salinas-Hollers

Manager of Finance and Admin. Svcs.

Work: (361) 387-4549 Ext. 221

Cell: (361) 947-0921

Fax: (361) 387-4717

Website: www.nueceswater3.com

"Water is Precious...USE is Wisely!"



CONFIDENTIALITY STATEMENT

This transmission may be: (1) subject to the Attorney-Client Privilege, (2) an attorney work product, or (3) strictly confidential. If you are not the intended

recipient of this message, you may not disclose, print, copy or disseminate this information. If you have received this in error, please reply and notify the sender (only) and delete the message. Unauthorized interception of this e-mail is a violation of federal criminal law.

Disclaimer

This entire e-mail may contain confidential information belonging to the sender which is legally privileged. This information is intended only for the use of the individual(s) or entity named above. If you are not the intended recipient you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this e-mail in error please notify the sender immediately by e-mail and then delete this e-mail from your system.

Mail delivered by Hanson Professional Services Inc. mail system.

Random idea about GIS/grant decision support

Amanda Torres <AmandaT@cctexas.com>

Thu 2/24/2022 10:07 AM

To: Wowk, Katya <katya.wowk@tamucc.edu>; Mary Afuso <mary@coastalbendcog.org>

Good morning!

So I was thinking about the CDBG-MIT comments for Corpus, and thought, “Wouldn’t it be good with our capital improvement projects were mapped and then other layers like LMI or the floodplain could be over-laid dependent on the grant opportunity criteria?” Then I thought wouldn’t it be cool if we did that on a regional scale? It would be quite an undertaking to build it out, but it would be so useful regionally! Perhaps that GIS project could be grant funded? It’s a semi-random thought but wanted to share while it was on the top of my mind!



Amanda Torres, MPA, CFM
Senior City Planner

City of Corpus Christi – Planning Division
1201 Leopard St., 78401 | City Hall, 4th Floor
P.O. Box 9277 | Corpus Christi, TX 78469-9277
Phone: (361) 826-3246 | Fax: (361) 826-3609
AmandaT@cctexas.com | www.cctexas.com/planning

Aransas County Texas Multi-Jurisdictional Hazard Mitigation Action Plan referenced in the comment may be found here:

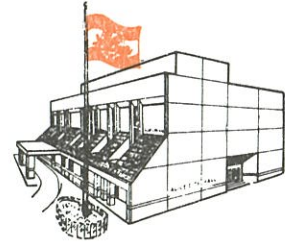
<http://www.coastalbendcog.org/sites/default/files/2022-10/Aransas%20County%20Hazard%20MIT%20attachment.pdf>



CITY OF ALICE, TEXAS

P.O. BOX 3229

ALICE, TEXAS 78333



To: Coastal Bend Council of Governments
From: Michael Esparza, City of Alice City Manager; Mayor Cynthia Carrasco
Date: February 16, 2022
Re: Method of Distribution for the \$179,547,000 in community Development Block Grant Mitigation Funds allocated to the Region

TO WHOM IT MAY CONCERN:

The City of Alice has funding needs to address the following mitigation activities:

- Core communication infrastructure for public safety;
- Water and wastewater infrastructure;
- Infrastructure security (cameras, gates & locks, fencing) for our Water Treatment Plant, our two Wastewater Treatment Plants, and Lake Findley (our drinking water reservoir) Pump Station;
- Generators: Lake Findley Pump Station, City Hall (continuity of government), Central Fire Station.

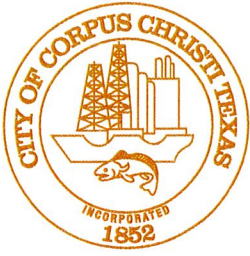
We appreciate the opportunity to submit this information for consideration and are available to answer questions and to provide additional information.

Thank you.

Regards,

Michael Esparza
City Manager

XC: Odilia Rodriguez; Patrick Thomas; Barbara Reaves



March 4, 2022

Peter Zanoni
CITY MANAGER

PO Box 9277
Corpus Christi
Texas 78469-9277
Phone 361-826-3220
Fax 361-826-3839
Peterz@cctexas.com
www.cctexas.com

John P. Buckner
Coastal Bend Council of Governments
2910 Leopard Street
Corpus Christi, TX 78408

Dear Mr. Buckner,

On behalf of the City of Corpus Christi, I am writing to provide comment on the process of developing a Method of Distribution (MOD) for funds allocated to the Coastal Bend Region by the Texas General Land Office under the Community Development Block Grant – Mitigation (CDBG-MIT) Regional Mitigation Program (COG MOD).

The Coastal Bend Council of Governments (CBCOG) distributed a survey in the community that asked what type of projects should be funded through the CBCOG Regional Mitigation Program. The City of Corpus Christi supports prioritizing funding for projects that have flood prevention benefits, increase the resiliency of Critical Infrastructure against flooding or natural disasters, or improve drainage in communities.

The CDBG-MIT program requires that 50% of the funding is spent to benefit low to moderate income (LMI) persons. This metric could prohibit the most impactful projects from being funded under this program. When a hurricane hits the coast or we face flooding in heavy rain events, the storms do not choose which areas to damage based on income demographics. We encourage policy makers to revisit this requirement in the future. The City encourages the CBCOG to implement the LMI requirement in a way that offers the most flexibility possible. In many cases an area where a project is constructed may not meet the LMI requirement alone, but projects benefit a much larger service area. The larger area that benefits from the project should be considered when meeting the LMI requirement. For example, over the past decade, the Greenwood Wastewater Treatment Plant has experienced at least two (2) major flooding events that have caused damage to equipment, endangered personnel, inhibited the plant's ability to disinfect and meter the wastewater and caused wastewater outflows to La Volla Creek. The census block group where the plant is located is 40% LMI, but the flood mitigation and resiliency improvements that are needed will benefit the entire basin that is served by the plant. The plant serves over 64,000 people and the larger basin meets 57% LMI. See attached map for illustration.

In addition to LMI, the CBCOG must determine how to distribute the funding among eligible jurisdictions based on verifiable data sets. After examining the data sets presented by the COG in the public meeting on February 16, 2022, the City recommends that the following data sets be used to determine the distribution to eligible jurisdictions.

1. FEMA Public Assistance Program – Declared Disasters Regionwide/FEMA PA Program – Number of Applicants Regionwide
2. FEMA Number of Flood Claims per Zip Code for Disasters between 2002-2019
3. Composite Disaster Index (showing how vulnerable a location is for natural hazards)
4. Population

Thank you for the opportunity to Comment on the CBCOG Method of Distribution for the Community Development Block Grant – Mitigation (CDBG-MIT) Regional Mitigation Program (COG MOD). If you have any questions or need additional information regarding information included in these comments, please reach out to Tammy Embrey, Director of Intergovernmental Relations at tammye@cctexas.com or 362-826-3622.

Sincerely,



Peter Zanoni
City Manager

Williams Ditch/Oso Bay Basin Flood Mitigation Project LMI Flexibility Example

Project Area Detail- Scope

The Williams Ditch/Oso Bay Basin Flood Mitigation project will address a major flood prone area of Corpus Christi in the Oso Bay Stormwater Basin. The project entails upgrading Williams Ditch, a detention pond and other drainage improvements in the Tanglewood neighborhoods. The original drainage system was sized to convey a 5-year storm event. Additional storm sewer is required for a 25-year storm event starting upstream at Rodd Field Road and heading downstream to Oso Bay, running along a one-mile section of earthen ditch. In the first section from Rodd Field Rd. to Lexington Rd., the City will construct underground drainage structures as opposed to expanding the open channel system currently in place. This direction to go underground stems from a future planned extension of Williams Dr. roadway. In addition, it would be difficult to acquire the additional right-of-way would need to expand the current open channel. Designed to be a multi-functional facility, a roadway will eventually be constructed over the underground drainage conveyance. Additional culverts would also be installed at the Lexington Rd. bridge. The remaining 60% of the project employs green infrastructure. The next section from Lexington to Ennis Joslin Rd. would expand the open channel and add culverts at the Ennis Joslin Rd. bridge. A detention basin will be sited upstream near Williams Drive and S. Staples Road. To further address this localized flooding of adjacent neighborhoods, an intervention will divert the off-site runoff from drainage areas into a new detention pond located at the neighborhood park to reduce the amount of water flowing into the adjacent residential backyards at Tanglewood Drive. The existing system will be improved by adding a curb inlet extension to the existing sag inlet and a new underground system extension along the westside to divert drainage flows into the new detention system. The anticipated project scope for the consultant engineer includes preliminary design for determining appropriate flood proofing improvements, detailed design, development of construction documents, and construction phase services.

LMI Benefit

This project will benefit a population of 13,383 and the total combined area is 55% low/moderate income. The project benefits a section within the Oso Bay Stormwater Basin in Corpus Christi and Nueces County, Texas. This project will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. This project will address top hazards impacting Texas: severe coastal and riverine flooding, storms and hurricanes/tropical storms and tropical depressions. The project also will implement resiliency objectives of critical FEMA Community Lifelines of Safety and Security, Transportation, Health and Medical, and Food, Water and Security, identified in the State Risks and Hazard Assessment. With the project's improvements, the Lexington St. and Ennis Joslin Road bridges which provide access to SPID, a hurricane evacuation route, will be able to better function during and after future flood events.

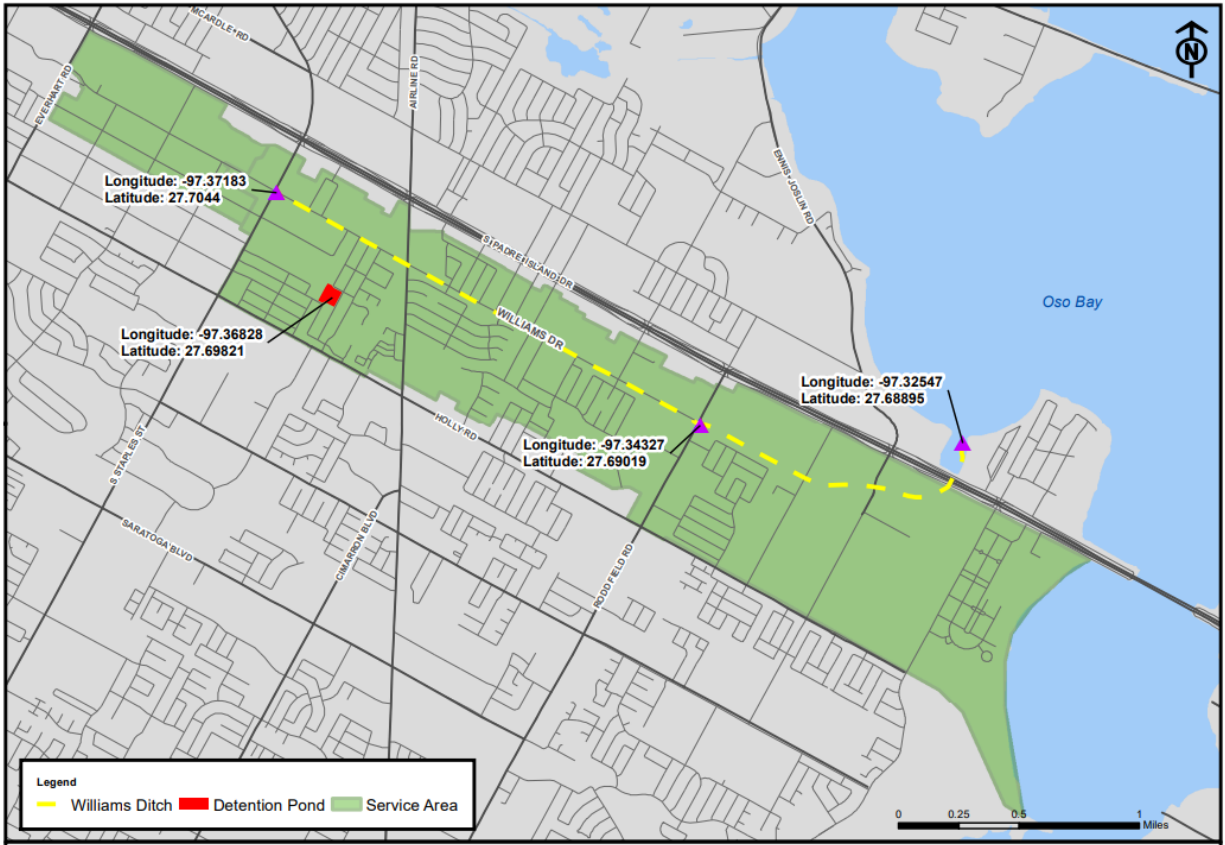
Storms will continue to fuel lowland flooding and flash flooding of the ditch, putting life and public safety at risk. The project will help safeguard critical infrastructure. This is the only open channel conveyance south of South Padre Island Drive (SPID), a U.S. highway. Flooding poses risks to significant infrastructure. Corpus Christi Medical Center Bay Area, located on Rodd Field Road at SPID is a full-service, acute care hospital with an adjacent three-story medical office building. Specialized services include a 24-hour Emergency Department with a Level II Trauma designation, Cardiovascular Services, and a Neonatal Intensive Care Unit. Two bridges, one at Lexington Rd., and one at Ennis Joslin, provide ingress/egress to the residential areas to the south, and access to SPID, which is a designated hurricane evacuation route.

The project will also provide a community development benefit to reduce the long-term risk of upstream flooding and damage to structures insured under the National Flood Insurance Program that have had one or more claim payments for flood damages. There will be a reduction in risk of loss of life, injury, and property damage due to flash flooding resulting in localized flooding in the adjoining neighborhoods; and the project will accelerate recovery following a disaster by protecting the bridge infrastructure to allow ingress/egress of first responders, emergency and recovery services and supplies to adjoining neighborhoods. Critical medical infrastructure will be protected from localized flooding. The Williams Ditch/Oso Bay Flood Mitigation project is in a HUD-MID County. Williams Ditch drains the area generally bound by Everhart Road and Oso Bay, from South Padre Island Drive (State Hwy 358) to Holly Road. The tropical storm rain event on the weekend of September 17-19, 2010, inundated Corpus Christi with some of the largest flooding in recorded history, and subsequent storms due to tropical storm and hurricanes continue to stress the current drainage system.

The Williams Ditch/Oso Bay Basin Flood Mitigation project will advance long-term resilience by enhancing the capacity of stormwater system in one of the most flood prone areas of the city. It will align with other planned capital improvements including the city-wide storm water infrastructure rehabilitation and channel ditch improvements funded through the capital improvement program. It promotes community level and regional planning for current and future disaster recovery efforts and additional mitigation investments by protecting an arterial road connection to designated major hurricane evacuation routes and critical infrastructure. It will also provide environmental benefit, as a portion of the project will be designed as green infrastructure, using best management practices listed in the Texas Non-point Source

In the table below you can see that the Williams Ditch crosses a diverse set of census tracts when measuring LMI. This is another great example that shows the importance of evaluating the entire benefit area when calculating LMI for a proposed project.

CENSUS TRACT	BLOCK GROUP	LOW-MOD	LOW-MOD UNIVERSE	LOW-MOD PERCENTAGE	POPULATION
32.02	2	180	385	46.75	534
32.02	3	290	1,030	28.16	1,237
32.03	1	550	1,400	39.29	1,855
32.03	2	690	1,855	37.20	1,591
32.03	3	1,815	2,755	65.88	2,639
33.03	1	370	755	49.01	611
33.03	2	460	725	63.45	644
33.05	1	1,490	3,110	47.91	2,892
33.05	2	1,860	2,085	89.21	1,835
	Total	7,705	14,100	0.55	13,838



WILLIAMS DITCH / OSO BAY BASIN FLOOD MITIGATION
Project Area

10/8/2020



March 31, 2022

Craig T. Casper
Corpus Christi Metropolitan Planning Organization

Dear Craig

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development

RE: Please share with your Stakeholders

hilliard007@gmail.com <hilliard007@gmail.com>

Thu 2/17/2022 12:05 PM

To: Mary Afuso <mary@coastalbendcog.org>

Mary, I was not able to attend the meeting last night, but would like to stress the need to some of these funds to be awarded to communities that present Urgent Mitigation Needs that do not meet the LMI requirements, such as Ingleside on the Bay.

If there is another time I could speak or provide written comments, please send to my personal email address. Which I am sending this email from. I am not sure if you have heard, but WKMC has closed its doors. It was a sad day.

On another note, IOB is actively seeking a 15K grant from resiliency planning. I have run into a couple of walls in LMI requirements for many types of funding.

If you need a representative from our area please think of me. You may get push back from the Mayor, but I am chair of the planning and zoning commission, so that could bolster my credibility. Between you and me, the establishment of IOB, do not believe IOB needs resiliency planning or that there is anything we can do regarding the constant flooding. While I understand our budget restrictions, I believe that seeking grants such as this can help IOB deal with many of the troubling problems being experienced with approximately 40% of the city within the flood plain.

Thank you for your time and keep up the good work!

Jennifer Hilliard, AIA
Architect
361.249.6260

From: Mary Afuso <mary@coastalbendcog.org>

Sent: Monday, February 14, 2022 2:55 PM

To: emily@coastalbendcog.org

Cc: jackie@cbcogaaa.org; JBUCHANAN@DIOCESECC.ORG; cynthia.castro <cynthia.castro@hacc.org>; Angelina Garcia <agarcia@diocesecc.org>; aehileman@riotexas.org; alexander.garcia@redcross.org; amanda.michael@stbobcats.net; anash@ccbaptistassociation.org; angela.leach7176@icloud.com; angela.leal@hacc.org; anthony.ross@ag.tamu.edu; Arnold.Gomez@hhsc.state.tx.us; ashley@goldencrescenthabitat.org; beatriz.alvarado@raicestexas.org; bhanson@coastalbendfoodbank.org; bhanson@feedingamerica.org; bianca.kapadia@fema.dhs.gov; BillyD@CCTexas.com; bperrigue@trla.org; cbrandt.cbdr@gmail.com; cgarcia@svdpdisaster.org; chuckwoods212@yahoo.com; clara.rieder@co.san-patricio.tx.us; clint.bedwell@redcross.org; courtney.goss@tdem.texas.gov; cyndi@rockporthandsofhope.com; cynthia.medina@hacc.org; damian@onestarfoundation.org; dann.garcia@redcross.org; DanRFranklin@gmail.com; david@cbcogaaa.org; debra.sanders@co.san-patricio.tx.us; dego39@yahoo.com; desiree.voth@co.san-patricio.tx.us; dhale@pocca.com; diane@rockport-fulton.ccsend.com; donna.hurley@uwcb.org; Dorey.Love@att.net; drosson.cbdr@gmail.com; dwain.carter@texasbaptistmen.org; eescarzaga@endeavors.org; elayne.mitsui@co.nueces.tx.us; emily@coastalbendcog.org; emilyn@cctexas.com; EReyna-Brodhag@purpledoortx.org; fatherbrucewilson@gmail.com; Frank.Valley@starliterecovery.com; garry.barney@tdem.texas.gov; gbertrand@svdpdisaster.org; George.hm@allhandsandhearts.org; Gustavo.Perez@uss.salvationarmy.org; Gustavo.salinas@dfps.state.tx.us; hdyal@trla.org; heather.mcqueen@esc2.us; hiliary@cbrac.org; ivcarpenter@nccaatx.org; jaburnett@coastalbendfoodbank.org; jdelossantos@coastalplainsctr.org; jenessa.trebatoski@dchstx.org; jennifer.wickham@dwtx.org; jessica.vermilyea@upbring.org; jheard@aransascounty.org; Jennifer Hilliard <jhilliard@wkmccarchitects.com>; jkeough@helpdisastermanagement.org; jlugo@deafhhcenter.org; jreyna@diocesecc.org; jshoe@unitedwayhouston.org; Judy Telge <judyt@cbcil.org> <judyt@cbcil.org>; jwc-emc@co.jim-wells.tx.us;

Jeffrey West <jwest@edexcellence.org>; kaddison@purpledoortx.org; karen.turner@esc2.us; kathrynmasten@yahoo.com; katt.mcneil@upbring.org; Katya Wowk <katya.wowk@tamucc.edu>; Kdubose@mhm.org; klebergmrc@gmail.com; klewis@ccmetro.org; kmastencain@gmail.com; kpeach@svdpdisaster.org; Kristofer Morgan <Volunteer@corpuschristihf.org>; laura.wooldridge@nuecesco.com; ldisco@svdpdisaster.org; lindafs@cbcil.org; liza.esparza@christushealth.org; lpearce@aransaspass.org; lperez@coastalplainsctr.org; luci.sheppard@hpsc.state.tx.us; marcos.gonzalez@cacost.org; marioq@riotexasresponse.org; Mary Afuso <mary@coastalbendcog.org>; mdavis@bhcn.org; melissa.munguia@nuecesco.com; mescamilla@familyendeavors.org; miataman5461@aol.com; Misti.Townsend@uss.salvationarmy.org; Monica.Cruz@dshs.texas.gov; nataline.hall@robstownisd.org; pastormark1010@gmail.com; paula.jemison2@redcross.org; pr@centraltx.bbb.org; rebecca.rach@nuecesco.com; R J Thomas <rj@cbco.org>; robin.smith@dchstx.org; sara.williams@co.san-patricio.tx.us; Sasha Christensen <exec@corpuschristihf.org>; sdaley@samaritan.org; sdelacerda@coastalbendfoodbank.org; Shanna.owens@co.san-patricio.tx.us; sheri@portaransas.org; Simone Sanders <simone.sanders.glo@recovery.texas.gov>; Stephanie.West@grainger.com; tfigueroa@trla.org; tony.lamberth@helpdisastermanagement.org; valerie.gutierrez@christushealth.org; Viola Monrreal <viola@cbco.org>; wphipp@diocesecc.org; Yvonne.vidal@dchstx.org

Subject: Please share with your Stakeholders

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Coastal Bend Council of Governments (CBCOG) is seeking input on the method of distribution for the \$179,547,000 in Community Development Block Grant Mitigation Funds allocated to the region to address mitigation needs.

These funds are being directed to communities to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters.

The first Public Hearing will be held on Wednesday, February 16th at 6:30pm at the Coastal Bend Council of Governments office: 2910 Leopard St. Corpus Christi, TX 78408. A link to attend the meeting via ZOOM may be found at

<http://www.coastalbendcog.org/news-articles/public-hearings>

<https://www.surveymonkey.com/r/7R9J5W2>



COASTAL BEND
COUNCIL OF GOVERNMENTS

Mary Z. Afuso

Regional Disaster Recovery Manager

Coastal Bend Council of Governments

mary@coastalbendcog.org

o. 361-883-5743

c. 361-960-9203



MOD FOR GLO MONIES

Jo Ann Ehmann <joannehmann3@gmail.com>

Tue 3/1/2022 3:57 PM

To: Mary Afuso <mary@coastalbendcog.org>

As the Mayor of one of the smaller cities in our COG region, I feel that many times when monies are available to us, these monies are not really available. this is due to the long standing tradition of allocating and rewarding monies based on the HUD LMI conditions. I understand the need for the disadvantages communities within our region and many other regions in the state. The problem with this limitation is that is not allowing the smaller but more affluent, not rich, communities to participate in the programs. All communities have needs that are not met nor can they be funded through traditional budgeting sources, especially as the costs of services continues to increase each year.

If there is a way to make sure that all communities are allowed to participate and be eligible to have access to the funding, in the long run this might also help some of the other participants as well. Just because a community does not meet the HUD guidelines should not mean that they cannot bring their city up to current standards and expectations. If all have have the opportunity to become more resilient and hardy, then that benefits all in the surrounding regions as well.

LMI certainly needs to be included to insure we are on even playing field, but so does the fact that a community is not in the LMI category have the right to be included in the ability to participate.

Jo Ann Ehmann., Mayor
Ingleside on the Bay

Re: Fw: RRP Webinar Series on CDBG-MIT: Dec 16th

John Chen <john.chen@beevilletx.org>

Thu 2/17/2022 9:49 AM

To: Mary Afuso <mary@coastalbendcog.org>

Cc: John Benson <john.benson@beevilletx.org>

Mary,

Great to see you last night at the public hearing for the CDBG-MIT Method of Distribution.

As I mentioned, GLS scheduled a Zoom meeting with the City of Beeville and Bee County on Tuesday, 2/15/22 on the Bee Flood Needs Workshop. During that meeting, we shared with the GLO representatives that the City has been awarded CDBG-MIT dollars to remove low-water crossings and build 3 new bridges at Tyler St and Jackson Street. Attached is a map showing the locations of the proposed bridges funded by the CDBG-MIT.

Additionally, we also shared with GLO staff that there are additional two low water crossings, W. 2nd Street and W. Hefferman Street, over Poesta Creek that need to be included in the flood mitigation consideration as well. There is also a low water crossing over Hansley Creek, tributary to Poesta Creek, on S. Madison Street. The attached map also shows the locations of these low water crossings for your information. Lastly, the map also shows a drainage ditch that impacts the residents along Newhal Street, on the north side of the Beeville, with high flood risk.

When you overlay the flood map on Beeville, you will also see a large swath of land, just west of 181 frontage road is in the high flood risk area, that may be in need to reconfigure to allow regional retention to collect storm water. We are also looking for outside funding to undertake the storm water drainage master plan and improvements as well.

Again, it was great seeing you again. Let me know if you have any questions.



Jung-Han (John) Chen
Assistant City Manager
City of Beeville
400 N. Washington
Beeville, TX 78102
361-358-4641 ext. 243

---- On Fri, 03 Dec 2021 11:42:12 -0600 **Mary Afuso** <mary@coastalbendcog.org> wrote ----

Stakeholders -

I hope you will join us for this event.

From: RRP-News <rrp-news-bounces@listserv.tamucc.edu> on behalf of RRP via RRP-News <rrp-news@listserv.tamucc.edu>
Sent: Thursday, December 2, 2021 9:55 AM
To: RRP-News@listserv.tamucc.edu <RRP-News@listserv.tamucc.edu>
Subject: [RRP-News] RRP Webinar Series on CDBG-MIT: Dec 16th

The Regional Resilience Partnership is holding a monthly virtual webinar series in advance of the next round of Community Development Block Grant Mitigation funds. The webinars will provide ‘nuts & bolts’ information about risk mitigation strategies that can build resilience, while linking local partners with practitioners to help identify strategies that best meet local needs.

Join our first webinar on December 16th, 2:00-330p to discuss natural infrastructure approaches to mitigating flood risk and building resilience, featuring Nick Dornak, Meadows Center for Water and the Environment and Charriss York, Texas Community Watershed Partners. Our guest experts will discuss operational aspects of natural infrastructure projects, noting successful case studies and partners that can provide more information. Ample time will also be given for questions and discussion.

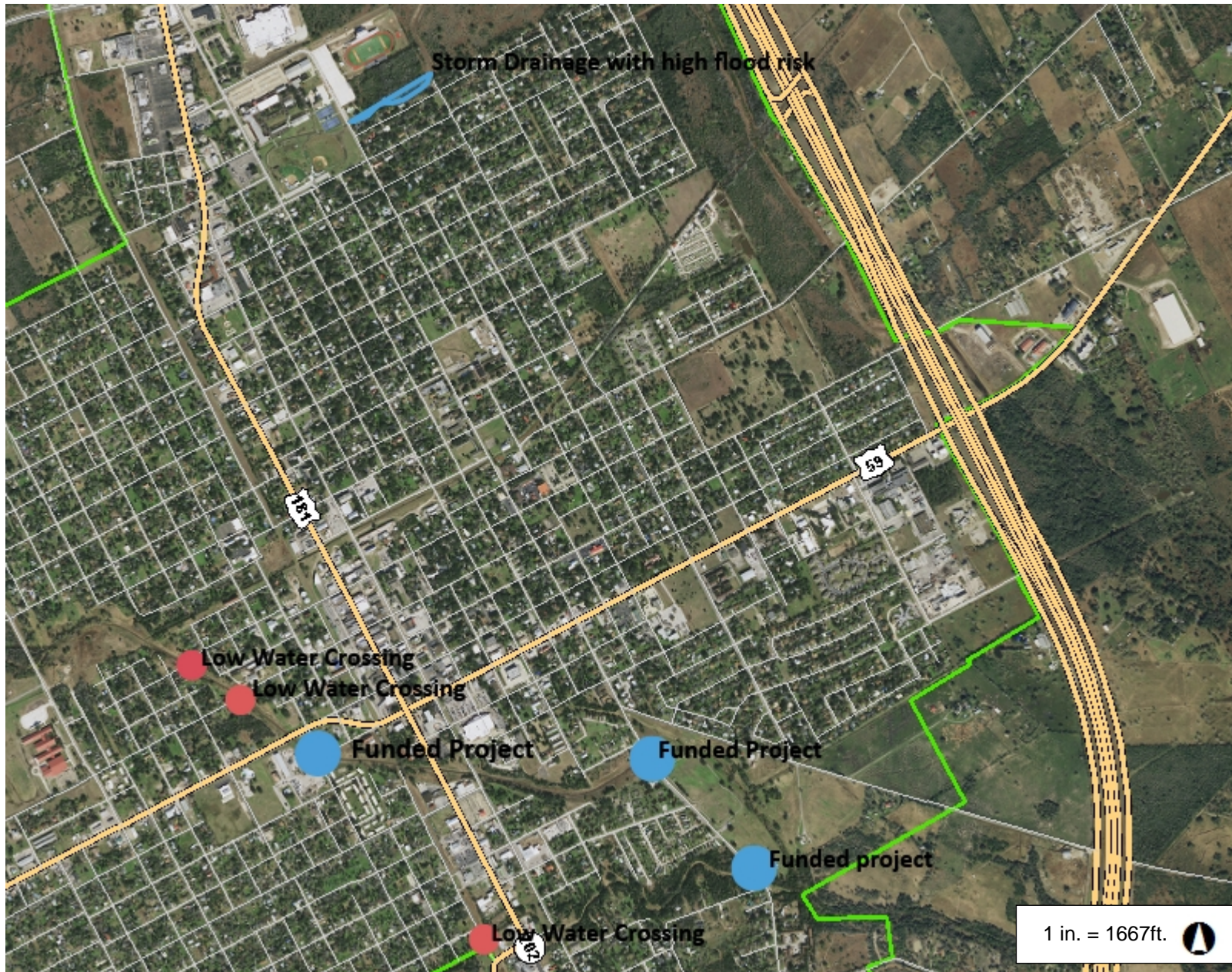
See attached for more info or [REGISTER HERE](#)

Presenters will be virtual but attendees also may gather in-person at the Coastal Bend Council of Governments, 2910 Leopard St, Corpus Christi, TX 78408.

This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. You cannot use or forward any attachments in the email. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and then delete this e-mail from your system.
City of Beeville City Hall, 400 N. Washington Street Beeville, Texas 78102 www.beevilletx.org

This email was delivered securely over a TLS connection

Flood Risk Locations in Beeville, TX



Legend

Road

— <all other values>

— US Highway

— State Highway

□ Corporate Limit

Notes

- A. Funded Projects.
- B. Unfunded Projects
- C. Storm Drainage with high flood risk!

3,333.3 0 1,666.67 3,333.3 Feet

This Cadastral Map is for informational purposes only. It does not purport to represent a property boundary survey of the parcels shown and shall not be used for conveyances or the establishment of property boundaries.

THIS MAP IS NOT TO BE USED FOR NAVIGATION



March 31, 2022

Addie Salinas-Hollers
Manager of Finance and Admin. Svcs.
Via email

Dear Addie

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with a large loop at the end of the last name.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Belinda Hinojosa-Persohn
Nueces County
Via email

Dear Belinda

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Judge Barbara Canales
Nueces County
Via email

Dear Judge Canales

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Nancy Bolting
Via email

Dear Nancy

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Natalie Eckstrom
Nueces County
Via email

Dear Natalie

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with a large loop at the end of the last name.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Peter Zanoni
City Manager
City of Corpus Christi
PO Box 9277
Corpus Christi, TX 78469-9277

Dear Peter

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Tammy Embrey
City of Corpus Christi
Via email

Dear Tammy

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name "Emily" and last name "Martinez" clearly distinguishable.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Tom Hegemier
Doucet and Associates, Engineers
Via email

Dear Tom

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive.

Emily Martinez
Director of Regional Economic Development



March 31, 2022

Jennifer Hilliard
hilliard007@gmail.com
Via email

Dear Jennifer

As Coastal Bend Council of Governments finalizes the Method of Distribution for the allocation of \$179,547,000 in Community Development Block Grant Mitigation Funds (CDBG-MIT) allocated to the region to develop strategic, high-impact activities to mitigate disaster risks and reduce future losses in areas impacted by recent disasters, I wanted to take a moment to thank you for participating in the public planning process. Your input was essential in determining what factors to select in the allocation process.

The survey asked participants to rank priorities in order of importance. The results:

1. Improved Drainage
2. Flood Prevention
3. Erosion Control
4. Broadband Access
5. Other
6. Raised Roadways
7. New Bridges

Other priorities listed included water quality, wastewater, living shoreline, asset protection and replacing aged water infrastructure. Additional input from the public included concern that the CDBG-MIT LMI requirement may hinder needed infrastructure projects if too rigidly applied. All comments and the survey response may be viewed on our website at <http://www.coastalbendcog.org/node/45>



COASTAL BEND
COUNCIL OF GOVERNMENTS

The input guided our decisions when determining the factors to use. The factors we chose are Population, Social Vulnerability Index, Percentage of Land in Floodplain, and Number of Declared Disasters. We also decided to allocate the LMI portion based on actual LMI of the community, rather than a rigid across the board percentage.

Once the GLO has given a preliminary approval of the MOD, it will be posted on our website. We expect them to get it to us mid-May. The public hearing is tentatively scheduled for May 18th at the Sinton Community Center, 1301 East Sinton Street, Sinton, TX 78387. A link to attend via Zoom will be on our website.

We encourage your continued input and participation in this process. Thank you for your commitment to building a vibrant, resilient Coastal Bend.

Sincerely,

A handwritten signature in black ink that reads "Emily Martinez". The signature is fluid and cursive, with the first name being more prominent.

Emily Martinez
Director of Regional Economic Development