



Council of Government (COG) Method of Distribution for 2017 Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information

Contact Information

Council of Government (COG): **Alamo Area Council of Governments**

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City, State, Zip: **San Antonio, Texas 78230**

Allocation Summary

COG Allocation for All Programs: **\$5,682,165**

Local Buyout and Acquisition Program Total: **\$4,152,165**

Local Infrastructure Program Total: **\$1,530,000**

Citizen Participation

Below is a description addressing how the COG complied with their Citizen Participation Plan regarding citizen and non-governmental organization outreach, and any additional efforts exceeding GLO minimum public participation requirements:

The Alamo Area Council of Governments held two public meetings. The first was a Public Planning meeting held in Karnes City at the Karnes County Courthouse Annex on Monday, June 18, 2018, at 10:00 am. Prior to this meeting, AACOG staff visited with communities within the three affected counties of Comal, Guadalupe, and Karnes County to inform them of the development of the Method of Distribution for the Housing Buyout and Acquisition Program and the Local Infrastructure Program as well as sending out email notices to housing and other non-governmental organizations. The PowerPoint presentation presented during the Public Planning Meeting and draft allocation were presented to the AACOG Board of Directors on June 27, 2018, at 10:00 am for review and approval. The draft allocation was posted for public comment on Wednesday, June 27, 2018 by 3:00 pm on the AACOG website for 14 calendar days. A Public Hearing was held on Friday, July 6, 2018, at 10:00 am at the Seguin Event Center in Seguin, Texas.

First Public Hearing Information

Date/Time: June 18, 2018/10:00 am Location: Karnes County Courthouse Annex, Karnes City, Texas
 Attendance: 11 Public Planning Meeting:

Personal 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	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	June 5, 2018 June 6, 2018 June 13, 2018	Emailed affected communities to schedule a meeting with them on the process for the MOD and what it means for their communities;
<input type="checkbox"/>	Fax		
<input checked="" type="checkbox"/>	Hand Delivery	June 7 2018 June 12, 2018 June 13, 3018 June 14, 2018	held one on one meetings with various communities and provided copy of the Public Notice for posting at their local offices; city of Seguin; New Braunfels/Comal County, Guadalupe County, Karnes County/Karnes City, Karnes County Housing Authority
<input type="checkbox"/>	Certified Mail		

Internet Notice. As required, public notice was distributed on the Internet at least **five** (5) days in advance using the following method:

	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	COG Website	June 13, 2018	www.aacog.com Screenshot of webpage

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 public hearing was published in the following regional newspaper(s):

	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	<i>SA Express News</i>	June 17, 2018	Affidavit
<input checked="" type="checkbox"/>	<i>Seguin Gazette</i>	June 13, 2018	Actual Newspaper
	<i>New Braunfels Herald-Zeitung</i>	June 14, 2018	Affidavit
	<i>Karnes Countywide</i>	June 13, 2018	Affidavit

Citizen Comment Documentation

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.	
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, meeting discussion is attached.	
	Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages (persons with Limited English Proficiency).	Posting included information on how to request accommodations; meeting facility was accessible. None were requested

Second Public Hearing Information¹

Date/Time: July 6, 2018/10:00 am Location: Seguin Event Center, Seguin, Texas
 Attendance: 4 Public Planning
 Meeting:

Personal 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	Date Sent	Documentation
<input checked="" type="checkbox"/>	Electronic Mail	June 27, 2018 July 3, 2018 (reminder)	Email to affected communities as well as Guadalupe Blanco River Authority
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input type="checkbox"/>	Certified Mail		

Internet Notice. As required, public notice was distributed on the Internet at least **five** (5) days in advance using the following method:

	Method	Date Published	Documentation
<input checked="" type="checkbox"/>	COG Website	06/26/2018	www.aacog.com (screen shot of webpage)

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 public hearing was published in the following regional newspaper(s):

	Newspaper Name	Date Published	Documentation
<input checked="" type="checkbox"/>	<i>SA Express News</i>	July 4, 2018	Pending affidavit
<input checked="" type="checkbox"/>	<i>Seguin Gazette</i>	June 27, 2018 July 4, 2018	Pending affidavit
	<i>New Braunfels Herald-Zeitung</i>	June 27, 2018 July 4, 2018	Pending affidavit

Citizen Comment Documentation

<input checked="" type="checkbox"/>	The required copy of a sign-in sheet from the public hearing is attached.	
<input checked="" type="checkbox"/>	A summary of the citizen comments, responses, and meeting discussion is attached.	
	Describe any efforts to notify and accommodate those with modified communication needs, such as posting information and providing interpretive services for other languages.	Posting information included directions on how to request accommodations. Meeting facility was accessible None requested

¹ If COG held third public hearing, insert information after second public hearing information.

Long-Term Planning and Recovery

Below is an explanation of how the COG's method of distribution fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing and the local economy and primarily, how these activities will contribute to the long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

The three affected counties, Comal, Guadalupe and Karnes County were not included as "most impacted" by HUD in the General Land Office's Action Plan. However, over 412 residents from communities in Karnes County (the smallest of the three counties) indicated some sort of damage based on the number of FEMA Individual Assistance and Small Business Administration (SBA) loan applications more than Comal and Guadalupe County combined. The Housing Acquisition and Buyout Program method of distribution gives Karnes County the greatest allocation of \$1,725,606 based on the number of households with reported damage. The other two counties did not have the same level of damage reported but has been included in three weather federal disaster declarations since 2015 and have homes that have had repetitive damage. Each county (as lead) will have an opportunity to acquire or buy damaged properties in their respective communities to promote long-term planning and recovery in their communities for mitigation of future events.

The impacted communities will have the opportunity to buy out or acquire homes prone to weather events to move families, especially the hardest to serve low and moderate income families, out of harm's way proactively before future weather events. In addition, communities will be able to address drainage concerns and fortify facilities (i.e., roofs) that had damage exacerbated by Harvey. Infrastructure investments may also support hazard mitigation plans which address not only long range planning but more importantly recovery.

In addition, AACOG has hired a part-time Regional Disaster Recovery Coordinator who will work primarily out of Karnes County to assist the communities with long term planning and recovery and related applications for related funding.

Unmet Housing Needs

Below is an explanation of how unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the HUD-identified most impacted and distressed areas and/or other impacted areas.

In accordance with the FEMA Individual Assistance reports there were some homes in Karnes County that did report damage but were not fully compensated by FEMA for the reported loss. Residents of Comal and Guadalupe Counties were not eligible for FEMA individual assistance short term recovery funds; these counties were only eligible for public assistance funds. However, residents from these counties did report damage related to Harvey.

The funds will be allocated at the county level to address unmet housing with Karnes County receiving the largest allocation based on their proportion of related damage reports (as stated above).

Affirmatively Furthering Fair Housing 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.

Low-to Moderate Income Requirement

Below is an explanation of how the method of distribution meet the 70 percent low-to moderate income (LMI) requirement for each program. This means that 70 percent of the funds must benefit areas that are 51% or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI).

Using the Excel Spreadsheet provided to us by the General Land Office (GLO), the 70% Low to Moderate Income (LMI) threshold was listed and was stressed during the Public Planning Meeting and Public Hearing as well as all one on one meetings held with eligible entities. \$3,977,516 of the \$5,682,165 allocation must benefit LMI and are allocated accordingly.

Local Buyout and Acquisition Program Method of Distribution Detail

The COG is required to prepare a method of distribution for the local buyout and acquisition program funds between the eligible cities, counties, and entities with eminent domain authority. The GLO has directed the COG to use a direct allocation technique based on objective and verifiable data.

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Damage Reports	50	FEMA Individual Assistance applications and SBA loan	Residents who filed a claim for damages incurred from Hurricane Harvey is an indicator of the level

		applications from residents of affected counties (Comal, Guadalupe, and Karnes Counties)	of damage received by the communities
Population	25	Census Data	Proportionately allocates the available funding
Disasters since 2015	25	Federal Disaster Declarations	Indicates repetitive loss for communities in the last 3 years and their vulnerability

*Add more rows if needed

All allocations must meet or exceed a floor of \$1,000,000 to help ensure sufficient funds for the Local Buyout and Acquisition program.

Eligible Activities

Activities must be specifically related to Hurricane Harvey, and must meet the following criteria as outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.2.d).

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.		
-OR-			
<input type="checkbox"/>	The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Buyout	<input type="checkbox"/>	Activities designed to relocate families outside of floodplains
<input type="checkbox"/>	Acquisition	<input type="checkbox"/>	Public service within the 15 percent cap (e.g. housing counseling, legal counseling, job training, mental health, and general health services)
<input type="checkbox"/>	Relocation Assistance with buyout or acquisition activities	<input type="checkbox"/>	FEMA Hazard Mitigation Grant Program (HMGP) cost share
<input type="checkbox"/>	Demolition only		

Ineligible Activities

Incentive payments to households that move to disaster-impacted floodplains. Activities located within the city limits of Houston and/or within Harris County are ineligible to participate in the program.

Local Infrastructure Program Method of Distribution Detail

The COG is required to prepare a method of distribution for the local infrastructure program funds between the eligible cities and counties. The GLO has directed the COG to use a direct allocation technique based on objective and verifiable data.

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
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Damage Reports	50	FEMA Public Assistance applications from communities in the Harvey disaster declaration	Communities who filed a claim for damages incurred from Hurricane Harvey is an indicator of the level of damage received by the communities
Population	25	Census Data	Proportionately allocates the available funding
Disasters since 2015	25	Federal Disaster Declarations	Indicates repetitive loss for communities in the last 3 years and their vulnerability

*Add more rows if needed

All allocations must meet or exceed a floor of \$100,000 to help ensure sufficient funds for at least one eligible project.

Eligible Activities

Activities must be specifically related to Hurricane Harvey, and must meet the following criteria as outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.7.d).

Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.		
-OR-			
<input type="checkbox"/>	The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Water Facilities	<input type="checkbox"/>	Specially Authorized Public Facilities & Improvements
<input type="checkbox"/>	Sewer Facilities	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Other Public Utilities (gas, et al)	<input type="checkbox"/>	Clearance & Demolition Activities
<input type="checkbox"/>	Street Improvements	<input type="checkbox"/>	Code Enforcement
<input type="checkbox"/>	Flood and Drainage Improvements	<input type="checkbox"/>	Senior Centers
<input type="checkbox"/>	Debris Removal	<input type="checkbox"/>	Economic Development
<input type="checkbox"/>	Community Centers & Emergency Shelters (Existing)	<input type="checkbox"/>	Parks, Playgrounds and other Recreational Facilities
<input type="checkbox"/>	Fire Protection Facilities and Equipment	<input type="checkbox"/>	Other CDBG-DR eligible activities related to infrastructure

Ineligible Activities

Ineligible activities for the local infrastructure program are outlined in the State of Texas Plan for Disaster Recovery: Hurricane Harvey (Section IV.F.7.e) and should be referenced accordingly.

Approval and Signatory Authority

A Resolution of the COG is attached 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

Date

Diane D. Rath
Printed Name

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Title

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