

## Texas General Land Office

State of Texas CDBG-Mitigation Regional Mitigation Program

MIT COG MOD Summary



Delivered to the GLO:

Approved by the GLO:

### Council of Governments: Brazos Valley Council of Governments

#### HUD MID and State MID Allocations

|                                   |                     |
|-----------------------------------|---------------------|
| HUD MID Total                     | N/A                 |
| State MID Total                   | \$25,041,000        |
| <b>Grand Total COG Allocation</b> | <b>\$25,041,000</b> |

Table 1

#### Funding Limits

|                                 |           |  |
|---------------------------------|-----------|--|
| Minimum Amount Waiver Requested | Yes       |  |
| Minimum Amount                  | \$500,000 |  |
| Maximum Amount                  | N/A       |  |

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.

Each of the entities in our area have mitigation-related projects that they have identified. The method of distribution we have developed utilizes multiple data sets that offer a different perspective on the realities of our region. LMI and SoVi heavily factor in the portion of our population that would be most affected by a future natural disaster. Population ensures that we are still working to affect the most amount of people possible, while not over weighing that data point as to neglect our more rural, low-population areas. FEMA IA (RP) factors in the losses associated with damage of past hazards for the purpose of targeting areas that have experienced previous losses that could potentially be mitigated. With these data selections and justifications, we believe we are enabling our jurisdictions to complete projects that reduce risk, foster long-term resiliency, and fortify affected and distressed areas.

Table 3

## Distribution Factors

The COG has selected the following distribution factors:

| Distribution Factor* | Weight | Documentation Source   | Explanation of Factor Selection and Weighting  |
|----------------------|--------|--|--|
| LMI %                | 50%    | HUD and Surveys  | Supports efforts to meet LMI requirements from HUD. Supports efforts to serve most vulnerable, underserved populations.  |
| Population           | 12.5%  | 2019 5-Yr American Survey from the U.S. Census Bureau from the GLO | Included to balance serving the most people possible while not overemphasizing this metric as to only serve our higher population areas. Todd Mission and Midway numbers are from citywide surveys.                          |
| FEMA IA (RP)         | 12.5%  | FEMA   | These datasets represent FEMA IA Non- PII applicant data at the place, census block, and American Indian Area geographies for declared disasters in Texas between 2002 and 2019. This data was directly requested from FEMA. |
| Social Vulnerability | 25%    | CDBG-MIT AP Analysis   | Adds another metric for quantifying the vulnerability of a community, especially as it relates to its ability to withstand future disasters/hazards.   |

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 |
|-------------------|----------------------|---------------------------------|
|                   |                      |                                 |
|                   |                      |                                 |
|                   |                      |                                 |
|                   |                      |                                 |

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.  |                          |   |
| <b>-OR-</b>                         |  |                          |   |
| <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"/> | Other infrastructure improvements   |
|                                     |  | <input type="checkbox"/> | Public Services ( <i>within the 15% cap</i> )   |
| <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"/> | 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.

This image shows a completely blank white page. It is surrounded by a thin, solid black rectangular border. There are no markings, text, or illustrations on the page itself.

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.

Our strategic plan to meet the LMI national objective begins with our data selections and weights. LMI % is weighted at 50% in the allocation worksheet. SoVi is weighted at 25% in the allocation worksheet. This means that three-fourths of the allocation are focused on serving the economically distressed populations in our region. After the allocation has taken place, our regional partners have been well-informed about the intentions and purpose of this money and have already focused their attention on identifying projects that will have the best opportunity of meeting our regional threshold.

The LMI percentages in the “Allocation Summary” of our Preliminary Allocation spreadsheet were chosen to best give our jurisdictions the opportunity to hit the thresholds while maintaining the national objective. We are asking our jurisdictions with over 51% LMI to dedicate 100% of their funds to LMI projects, our jurisdictions with between 45% and 51% LMI to dedicate 50% of their funds to LMI projects, and our jurisdictions with between 40% and 45% LMI to dedicate 25% of their funds to LMI projects.

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):          | January 19 <sup>th</sup> , 2022 @ 12:00 PM |                    |
| Location(s):      | BVCOG Board Room                           |                    |
| Total Attendance: | 20   |                    |

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          | January 12 <sup>th</sup> , 2022 |                    |
| <input type="checkbox"/>            | Fax            |                                 |                    |
| <input type="checkbox"/>            | Hand Delivery  |                                 |                    |
| <input type="checkbox"/>            | Certified Mail |                                 |                    |

Table 11

|                       |                                 |                           |
|-----------------------|---------------------------------|---------------------------|
| <b>Website Notice</b> | <b>Public Planning Meeting</b>  | <b>MOD Public Hearing</b> |
| Date(s)               | January 14 <sup>th</sup> , 2022 |                           |

*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):

[illegible]

## Public Comment Period

|             |     |           |     |              |                |
|-------------|-----|-----------|-----|--------------|----------------|
| Start Date: | TBD | End Date: | TBD | No. of Days: | TBD (>15 days) |
|-------------|-----|-----------|-----|--------------|----------------|

## 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.

BVCOG sent detailed email invitations 7 days before the hearing and followed up with secondary notifications on at least one other occasion for all invited parties. BVCOG directly contacted the community service-oriented organizations by phone to ensure they knew what was taking place, when it was taking place, and how they could participate in the process. BVCOG received calls from community members and answered questions in detail to ensure any concern they had was accounted for. BVCOG maintained a virtual option to ensure travel barriers were not a factor.

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).

Notices for the public hearings was sent out to local media outlets, social media and public service announcements that reached residents who have Limited English Proficiency and disabilities such as auditory and visual impairments that may hamper their receipt of the notices in other ways.

BVCOG provided reasonable accommodations for persons attending the public hearings. Requests from persons needing special accommodations could have been received by BVCOG staff 48 hours prior to a meeting. The public hearing was conducted in English and requests for language interpreters or other special communication could have been made at least 48 hours prior to the meeting.

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: | Cagan Baldree                  |
| Title:        | Public Safety Planning 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

Date

Printed Name

Title

Email Address

Telephone Number