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March 4, 2022

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 CGBG-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