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| Approved by the GLO: |  |

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| --- | --- |
| Delivered to the GLO: | April 1, 2022 |

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State of Texas Regional Mitigation Program

**Texas General Land Office**

State of Texas CDBG-Mitigation Regional Mitigation Program

MIT COG MOD Summary



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

|  |  |  |
| --- | --- | --- |
| *Minimum Amount* Waiver Requested | Yes | No |
| 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 approval, CBCOG will share the allocation calculations with County officials so they can make informed decisions about where best to spend the allocation.  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 |

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:

|  |  |  |  |
| --- | --- | --- | --- |
|  | The COG has chosen not to limit subrecipients in the region to projects meeting regional priority activities. | | |
| **-OR-** | | | |
|  | The COG has limited subrecipients in the region to selecting projects meeting the following regional priority activities: | | |
|  | Flood control and drainage improvement, including the construction or rehabilitation of stormwater management systems |  | Water and sewer facilities |
|  | Communications infrastructure |
|  | Provision of generators |
|  | Natural or green infrastructure |  | Removal of debris |
|  | Public Facilities (shelter, library, etc.) |  | Streets or bridges |
|  | 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) |  | Other infrastructure improvements |
|  | Public Services (*within the 15% cap*) |
|  | FEMA Hazard Mitigation Grant Program (HMGP) cost share for CDBG-MIT eligible project |
|  | Buyouts or Acquisitions with or without relocation assistance, down payment assistance, housing incentives, or demolition |
|  | 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?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes |  | 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 |
|  | Email | 2/11/2022 |  |
|  | Fax |  |  |
|  | Hand Delivery | 2/11/2022 |  |
|  | Certified Mail |  |  |

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 |
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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 |  | Date |
| John Buckner |  | Executive Director |
| Printed Name |  | Title |
| [emily@coastalbendcog.org](mailto:emily@coastalbendcog.org); John@cbcog98.org |  | 361-883-5743 |
| Email Address |  | Telephone Number |