

-REVISED-

MEETING NOTICE AND AGENDA

COASTAL BEND COUNCIL OF GOVERNMENTS

SEPTEMBER 30, 2022

2:00 PM

CBCOG OFFICE

Conference Room

Corpus Christi, Texas

-
1. Call to Order/Roll Call
 2. Approval of Minutes of the August 26, 2022 Meeting
 3. Treasurer's Report
 4. Items Requiring Action by Council of Governments
 - A. CHAIRMAN'S REPORT
 - B. REGIONAL NATURAL RESOURCE SOLID WASTE ADVISORY COMMITTEE REPORT
 - C. ECONOMIC DEVELOPMENT REPORT
 - D. COUNCIL ON AGING REPORT
 - E. HOMELAND SECURITY ADVISORY COMMITTEE REPORT
 5. Announcements and Non-Action Items
 6. Adjourn

*****PLEASE HAVE THIS PACKET FOR THE MEETING*****

MEMORANDUM

TO: Members of the Coastal Bend Council of Governments

FROM: Mayor Patrick Rios, Chairman

DATE: September 16, 2022

SUBJECT: Supporting Material for the September 30, 2022 CBCOG [Revised]

A. CHAIRMAN'S REPORT

Confirmation of Committee Appointments (Attachment A)

B. REGIONAL NATURAL RESOURCE SOLID WASTE ADVISORY COMMITTEE REPORT

RESOLUTION NO. 4029

A RESOLUTION AUTHORIZING AN AMENDMENT TO THE COASTAL BEND REGIONAL SOLID WASTE GRANT FUNDING PLAN FOR FISCAL YEAR 2023. (Attachment B)

C. ECONOMIC DEVELOPMENT REPORT

RESOLUTION NO. 4030

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

D. COUNCIL ON AGING REPORT

1. RESOLUTION NO. 4031

A RESOLUTION AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE AMENDMENT NO.3 TO CONTRACT NO. HHS00874100007 WITH THE HEALTH AND HUMAN SERVICES COMMISSION ("Grantee or Contractor) WITH COASTAL BEND COUNCIL OF GOVERNMENTS AND COLLECTIVELY THE "PARTIES" TO THE HHSC CONTRACT EFFECTIVE OCTOBER 1, 2020 (THE "CONTRACT") NOW WANT TO AMEND THEIR AGREEMENT FURTHER. THE CONTRACT IS AMENDED BY ADDING FUNDS THAT WILL BE USED TO SUPPORT SERVICES DELIVERY DURING FFY 2024 AND FFY 2025. THE TOTAL CONTRACT AMOUNT SHALL INCREASE BY \$11,931,860.00—FROM \$10,460,408 TO \$22,401,255.00.
(Attachment D-1)

2. RESOLUTION NO. 4032

A RESOLUTION AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE A NEW CONTRACT AGREEMENT FOR FY2022-2023 WITH HEALTH CARE UNLIMITED TO

PROVIDE SUPPORT SERVICES FOR RESPITE IN-HOME AND PERSONAL ASSISTANCE AS A VENDOR THAT WILL BE A PART OF THE AREA AGENCY ON AGING'S VENDOR PURCHASE POOL FOR THE PROVISION OF SUPPORTIVE SERVICES FOR TARGETED OLDER PERSONS IN THE ELEVEN COUNTY COASTAL BEND AREA BEGINNING SEPTEMBER 1, 2022 UNTIL SEPTEMBER 30, 2023. (Attachment D-2)

3. RESOLUTION NO. 4033

A RESOLUTION AUTHORIZING ACCEPTANCE OF A GRANT FROM THE COASTAL BEND COMMUNITY FOUNDATION FOR LOCAL MATCH FOR FAMILY CAREGIVER EDUCATION AND TRAINING (\$6,000) SERVING THE COASTAL BEND REGION FOR THE PROJECT PERIOD SEPTEMBER 1, 2022 THROUGH AUGUST 31, 2023 IN THE AMOUNT OF \$6,000. (Attachment D-3)

E. HOMELAND SECURITY ADVISORY COMMITTEE REPORT

RESOLUTION NO. 4034

A RESOLUTION ADOPTING A MASTER AGREEMENT FOR MUTUAL AID TO SUPPORT THE REGION AND TO BETTER RESPOND TO EMERGENCY INCIDENTS (Attachment E)

COASTAL BEND COUNCIL OF GOVERNMENTS

RESOLUTION NO. 4029

A RESOLUTION AUTHORIZING THE AMENDMENT TO THE COASTAL BEND REGIONAL SOLID WASTE GRANT REGIONAL FUNDING PLAN FOR FISCAL YEAR 2023.

WHEREAS, the Coastal Bend Council of Governments authorized an application to the Texas Commission on Environmental Quality by Resolution No.3085 at its August 27, 2021 meeting for a Fiscal Year 2022 and Fiscal Year 2023 regional solid waste grant; and

WHEREAS, the CBCOG Regional Natural Resources-Solid Waste Advisory Committee voted on August 17, 2022 to amend the CBCOG Funding Plan for Fiscal Year 2023 to conduct Regional COG Managed Projects and not implement pass-thru grants to the local governments; and

WHEREAS, the Regional Natural Resource-Solid Waste Advisory Committee recommends the following grant funding implementation updates for Fiscal Year 2023:

Medsafe Liners for Existing Units and purchase of new units -	\$10,000.00
Local Enforcement Training and equipment for regional use -	\$10,000.00
Regional Tire Collection and Disposal Events -	\$13,000.00
Replacement of Sidewalk Buttler Vinyl Decals (188 total) -	\$558.00

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments concurs with the recommendation of its Regional Natural Resource - Solid Waste Advisory Committee and supports the above categories and allocation of funding as detailed in the Amendment to the Funding Plan for Fiscal Years 2023.

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

Mayor Patrick Rios, Chairman

ATTEST:

John P. Buckner, Executive Director

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

Texas General Land Office

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



Delivered to the GLO: April 1, 2022

Approved by the GLO: _____

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>
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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
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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

Method	Date(s)	Location(s)
<input checked="" type="checkbox"/> Hand Delivery	2/11/2022	
<input type="checkbox"/> Fax		
<input type="checkbox"/> Email		

Method	Date(s)	Location(s)
<input checked="" type="checkbox"/> Hand Delivery	2/11/2022	
<input type="checkbox"/> Fax		
<input type="checkbox"/> Email		

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	
<input type="checkbox"/> Fax		
<input checked="" type="checkbox"/> Hand Delivery	2/11/2022	
<input type="checkbox"/> 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

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
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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
<u>emily@coastalbendcog.org; John@cbcog98.org</u>	361-883-5743
Email Address	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 Coun	\$ 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
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
 HUD MID Allocation: \$ 149,509,000.00

Total Allocation: \$ 179,547,000.00
 State MID Allocation: \$ 30,038,000.00

City or County	First Distribution Factor: Population				Second Distribution Factor: SoVI				Third Distribution Factor: Percent land in floodplai				Fourth	
	Maximum Factor Measure:			362,151.00	Maximum Factor Measure:			5	Maximum Factor:			0.966061	Maxim	
	Factor Weight:			50	Factor Weight:			10	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)	
Council of Governments	N/A	362,151.00	50	#VALUE!	N/A		5	10	#VALUE!	N/A		20	#VALUE!	N/A
Nueces	362,151.00	362,151.00	50	50.00	3		5	10	6.00	0.27	0.966061	20	5.51	17
Corpus Christi	326,332.00	362,151.00	50	45.05	3		5	10	6.00	0.12	0.966061	20	2.58	16
San Patricio	66,969.00	362,151.00	50	9.25	3		5	10	6.00	0.22	0.966061	20	4.53	17
Aransas	24,220.00	362,151.00	50	3.34	3		5	10	6.00	0.57	0.966061	20	11.78	15
Portland	17,807.00	362,151.00	50	2.46	2		5	10	4.00	0.10	0.966061	20	2.09	2
Robstown	11,214.00	362,151.00	50	1.55	4		5	10	8.00	0.71	0.966061	20	14.76	7
Rockport	10,815.00	362,151.00	50	1.49	3		5	10	6.00	0.21	0.966061	20	4.35	4
Ingleside	9,768.00	362,151.00	50	1.35	3		5	10	6.00	0.83	0.966061	20	17.19	1
Aransas Pass	9,269.00	362,151.00	50	1.28	4		5	10	8.00	0.33	0.966061	20	6.91	7
Refugio County	7,015.00	362,151.00	50	0.97	3		5	10	6.00	0.16	0.966061	20	3.28	14
Sinton	5,389.00	362,151.00	50	0.74	3		5	10	6.00	0.56	0.966061	20	11.66	6
Mathis	4,759.00	362,151.00	50	0.66	4		5	10	8.00	0.01	0.966061	20	0.27	6
Port Aransas	4,203.00	362,151.00	50	0.58	3		5	10	6.00	0.76	0.966061	20	15.75	3
Bishop	3,085.00	362,151.00	50	0.43	3		5	10	6.00	0.36	0.966061	20	7.35	4
Taft	2,924.00	362,151.00	50	0.40	3		5	10	6.00	0.22	0.966061	20	4.55	4
Refugio	2,748.00	362,151.00	50	0.38	3		5	10	6.00	0.17	0.966061	20	3.60	3
Gregory	2,218.00	362,151.00	50	0.31	3		5	10	6.00	0.27	0.966061	20	5.58	6
Odem **	2,205.00	362,151.00	50	0.30	3		5	10	6.00	0.16	0.966061	20	3.36	3
Woodsboro *	1,441.00	362,151.00	50	0.20	3		5	10	6.00	0.01	0.966061	20	0.31	2
Fulton *	1,202.00	362,151.00	50	0.17	3		5	10	6.00	0.05	0.966061	20	0.95	3
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
Driscoll *	712.00	362,151.00	50	0.10	5		5	10	10.00	0.97	0.966061	20	20.00	4
Agua Dulce *	611.00	362,151.00	50	0.08	3		5	10	6.00	0.81	0.966061	20	16.72	2
Lake City *	506.00	362,151.00	50	0.07	5		5	10	10.00	0.55	0.966061	20	11.32	1
Bayside *	428.00	362,151.00	50	0.06	3		5	10	6.00	0.22	0.966061	20	4.61	1
San Patricio *	364.00	362,151.00	50	0.05	3		5	10	6.00	0.56	0.966061	20	11.69	4
Lakeside *	314.00	362,151.00	50	0.04	3		5	10	6.00	0.36	0.966061	20	7.36	1
Austwell *	118.00	362,151.00	50	0.02	3		5	10	6.00	0.00	0.966061	20	0.00	2
Petronila *	89.00	362,151.00	50	0.01	3		5	10	6.00	0.01	0.966061	20	0.21	2

* population under 2,000, rolled into county allocation
 ** City indicated they are not ready to receive allocation, rolled into county allocation

COG:

HUD MID Allocation:

City or County	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
	Factor Measure	Weight	Weighted Factor					
	Maximum (FMmax)	(W)	Wx(FM/FMmax)					
	17	20	#VALUE!	0.00	696.25	0.00	\$ 149,509,000.00	\$ 4,488,700.00
Council of Governments	17	20	20.00	81.51	696.25	0.12	\$ 145,020,300.00	\$ 31,252,100.00
Nueces	17	20	18.82	72.46	696.25	0.10	\$ 145,020,300.00	\$ 15,092,700.00
Corpus Christi	17	20	20.00	39.78	696.25	0.06	\$ 145,020,300.00	\$ 25,931,300.00
San Patricio	17	20	17.65	38.77	696.25	0.06	\$ 145,020,300.00	\$ 10,291,500.00
Aransas	17	20	2.35	10.90	696.25	0.02	\$ 145,020,300.00	\$ 2,269,600.00
Portland	17	20	8.24	32.55	696.25	0.05	\$ 145,020,300.00	\$ 6,778,900.00
Robstown	17	20	4.71	16.55	696.25	0.02	\$ 145,020,300.00	\$ 3,447,500.00
Rockport	17	20	1.18	25.71	696.25	0.04	\$ 145,020,300.00	\$ 5,355,500.00
Ingleside	17	20	8.24	24.42	696.25	0.04	\$ 145,020,300.00	\$ 5,086,700.00
Aransas Pass	17	20	16.47	26.72	696.25	0.04	\$ 145,020,300.00	\$ 11,622,800.00
Refugio County	17	20	7.06	25.47	696.25	0.04	\$ 145,020,300.00	\$ 5,304,400.00
Sinton	17	20	7.06	15.99	696.25	0.02	\$ 145,020,300.00	\$ 3,330,600.00
Mathis	17	20	3.53	25.86	696.25	0.04	\$ 145,020,300.00	\$ 5,385,600.00
Port Aransas	17	20	4.71	18.48	696.25	0.03	\$ 145,020,300.00	\$ 3,849,700.00
Bishop	17	20	4.71	15.66	696.25	0.02	\$ 145,020,300.00	\$ 3,261,400.00
Taft	17	20	3.53	13.51	696.25	0.02	\$ 145,020,300.00	\$ 2,813,300.00
Refugio	17	20	7.06	18.95	696.25	0.03	\$ 145,020,300.00	\$ 3,946,700.00
Gregory	17	20	3.53	13.20	696.25	0.02	\$ 145,020,300.00	\$ 2,748,956.50
Odem **	17	20	2.35	8.86	696.25	0.01	\$ 145,020,300.00	\$ 1,845,799.22
Woodsboro *	17	20	3.53	10.64	696.25	0.02	\$ 145,020,300.00	\$ 2,216,483.92
Fulton *	17	20	2.35	11.92	696.25	0.02	\$ 145,020,300.00	\$ 2,483,738.10
Ingleside on the Bay *	17	20	4.71	34.80	696.25	0.05	\$ 145,020,300.00	\$ 7,249,287.47
Driscoll *	17	20	2.35	25.16	696.25	0.04	\$ 145,020,300.00	\$ 5,240,290.77
Agua Dulce *	17	20	1.18	22.57	696.25	0.03	\$ 145,020,300.00	\$ 4,700,621.57
Lake City *	17	20	1.18	11.85	696.25	0.02	\$ 145,020,300.00	\$ 2,467,618.01
Bayside *	17	20	4.71	22.45	696.25	0.03	\$ 145,020,300.00	\$ 4,675,995.86
San Patricio *	17	20	1.18	14.58	696.25	0.02	\$ 145,020,300.00	\$ 3,036,888.05
Lakeside *	17	20	2.35	8.37	696.25	0.01	\$ 145,020,300.00	\$ 1,743,209.21
Austwell *	17	20	2.35	8.57	696.25	0.01	\$ 145,020,300.00	\$ 1,785,055.22
Petronila *	17	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

** City indicated they are
not ready to receive
allocation, rolled into
county allocation

COG: Coastal Bend

HUD MID Allocation: \$ 149,509,000.00

Total Allocation: \$ 179,547,000.00

State MID Allocation: \$ 30,038,000.00

City or County	First Distribution Factor: Population 2020				Second Distribution Factor: SoVI			
	Maximum Factor Measure:		40,796.00		Maximum Factor		4	
	Factor Weight: 50				Factor Weight: 10			
	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
Bee	32,609.00	40796	50	39.97	1	4	10	2.50
Kleberg	30,725.00	40796	50	37.66	3	4	10	7.50
Kingsville	25,367.00	40796	50	31.09	3	4	10	7.50
Alice	18,859.00	40796	50	23.11	4	4	10	10.00
Beeville	14,261.00	40796	50	17.48	3	4	10	7.50
Premont	2,564.00	40796	50	3.14	4	4	10	10.00
Orange Grove*	1,370.00	40796	50	1.68	3	4	10	7.50

* population under 2,000, rolled into county allocation

COG:

HUD MID Allocation:

City or County	Third Distribution Factor: % land in flood zone				Fourth Distribution Factor: Declared Disasters				Entity Weighted Factor Total (EWFtot)
	Maximum Factor		0.821		Maximum Factor		17		
	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)	
Jim Wells	20%	0.821	20	4.87	17	17	20	20.00	82.37
Bee	14%	0.821	20	3.41	13	17	20	15.29	61.17
Kleberg	23%	0.821	20	5.60	13	17	20	15.29	66.05
Kingsville	9%	0.821	20	2.17	9	17	20	10.59	51.35
Alice	82%	0.821	20	20.00	7	17	20	8.24	61.35
Beeville	20%	0.821	20	4.97	4	17	20	4.71	34.65
Premont	14%	0.821	20	3.31	4	17	20	4.71	21.16
Orange Grove*	0	0.821	20	0.00	3	17	20	3.53	12.71
								Weighted Factor Total:	390.82

* population under 2,000, rolled into county allocation

COG:

HUD MID Allocation:

City or County	Weighted Factor Total (WFtot)	Proportional Weighted Factor (PWF) EWFtot/WFtot	Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
Jim Wells	390.82	0.21	\$ 30,038,000.00	\$ 7,307,700
Bee	390.82	0.16	\$ 30,038,000.00	\$ 4,701,600
Kleberg	390.82	0.17	\$ 30,038,000.00	\$ 5,076,900
Kingsville	390.82	0.13	\$ 30,038,000.00	\$ 3,946,500
Alice	390.82	0.16	\$ 30,038,000.00	\$ 4,715,300
Beeville	390.82	0.09	\$ 30,038,000.00	\$ 2,663,500
Premont	390.82	0.05	\$ 30,038,000.00	\$ 1,626,500
Orange Grove*	390.82	0.03	\$ 30,038,000.00	\$ 976,572
		1.00		\$ 30,038,000.00

* population under 2,000, rolled into county allocation

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
Skuraw	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	For a written response, please provide
		Open-Ended Response	Name
		Drainage on Scott Street the area flood and needs proper drainage.	Raymond Castellano
2022-08-22 17:03:28	2022-08-22 17:23:39	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 oyster shells) connected	Peter M.Davidson
2022-08-17 09:06:00	2022-08-17 09:12:23		



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 cursive script that reads "Emily Martinez".

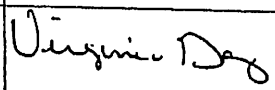
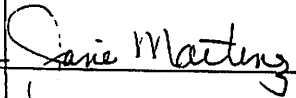

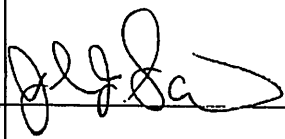
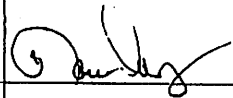
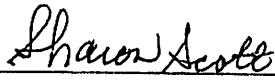

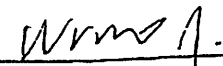

Emily Martinez
Director of Regional Economic Development

Name	Signature	E-mail	Comments
Carrie Meyer		northbeachcommunity@gmail.com	YES
Peter Davidson		sailboatcctx@gmail.com	yes
Tom Daley		tdaley@bizstr.r.r.com	NO
Justin Chen		Justin.chen@beardlick.com	✓
Anna Aldridge		aldridge@hanson-inc.com	X

Coastal Bend Council of Governments CDBG-Mitigation Public Meeting August 24, 2022

Location: Sinton Community Center 301 E. Market St. Sinton, TX 78387 Time: 6:00 pm

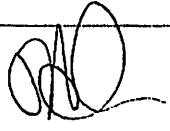


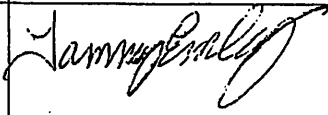
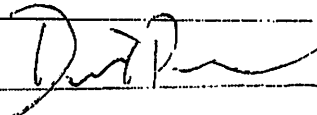
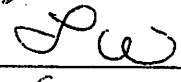
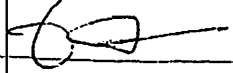
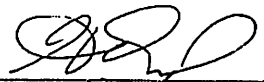
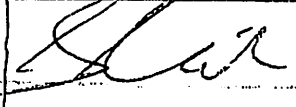
Virtual Meeting Link: <https://us02web.zoom.us/j/8230274974>

Print Name	Signature	Email address	Commenting?
Virginia Garza		mayorgarza@cityofodem.com	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Janie Martinez		jmartinez@cityofodem.com	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
PEDRO OSCAR ADAME		OSCAR.COUNCIL@INGLESIDETX.GOV	Yes <input type="checkbox"/> No <input type="checkbox"/>
John Salinas		J.SALINAS.Council@INGLESIDETX.GOV	Yes <input type="checkbox"/> No <input type="checkbox"/>
David Vega			Yes <input type="checkbox"/> No <input type="checkbox"/>
Sharon Scott		Mayor Sharon06@gmail.com	Yes <input type="checkbox"/> No <input type="checkbox"/>
J Ann Ehman		joannehman3@gmail.com	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Mike Pondolo		mpondolo@rockpointtx.gov	NO
Simone Sanders		SIMONE.SANDERS.GOV@RECOVERTEXAS.GOV	NO

Coastal Bend Council of Governments CDBG-Mitigation Public Meeting August 24, 2022

Location: Sinton Community Center 301 E. Market St. Sinton, TX 78387 Time: 6:00 pm





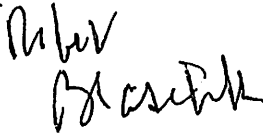
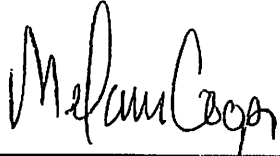


Virtual Meeting Link: https://us02web.zoom.us/j/8230274974

Print Name	Signature	Email address	Commenting?
John Hobson		sintonmanager@ sinton.texas.org	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Cathy Skuraw		Cathy.skuraw@ portlandtx.gov	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Travis Pruski		tpruski@nucces-ra.org	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Tammy Embrey		tammye@ectexas.com	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
David Parsons		davidparsons@cityofportlandtx.gov	Yes <input type="checkbox"/>
Lilly Wilkins		lwilkinson@SanPatricioCounty.tx.gov	No <input checked="" type="checkbox"/>
Jose Pereda		jose.pereda@cityofalbie.org	Yes <input type="checkbox"/>
Carol Edwards		cedwards@APTJ.GOV	No <input checked="" type="checkbox"/>
Ben M. Wise		ben.m.wise@ce.texas.com	Yes

Coastal Bend Council of Governments CDBG-Mitigation Public Meeting August 24, 2022

Location: Sinton Community Center 301 E. Market St. Sinton, TX 78387 Time: 6:00 pm

Virtual Meeting Link: <https://us02web.zoom.us/j/8230274974>

Print Name	Signature	Email address	Commenting?
Ann Nyberg		annrnyberg@gmail.com BEA	Yes <input type="checkbox"/> No <input type="checkbox"/>
JOHN REED		JREED@PUBLICMGT.COM	Yes <input type="checkbox"/> No <input type="checkbox"/>
Rebecca Taylor		becca.taylor@grantworks.net	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Natalie Eckstrom		natalie.eckstrom@grantworks.net	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Robert Blaschke		Judge.blaschke@gmail.com	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Melanie Cooper		mcooper@sanpatriciocountytx.gov	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Yolanda Moran		moran0211@sbcglobal.net	Yes <input checked="" type="checkbox"/>
Sonia Lopez		slopez@sanpatriciocountytx.gov	NO <input checked="" type="checkbox"/>

✓



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".

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". The signature is fluid and cursive.

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.

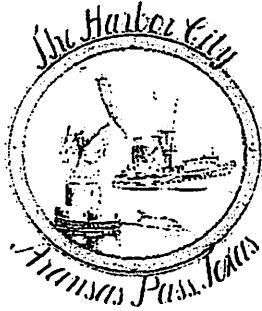
Thank you as always for your ongoing support and participation with CBCOG.

Sincerely,

Emily Martinez
Director of Regional Economic Development

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

www.coastalbendcog.org



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.

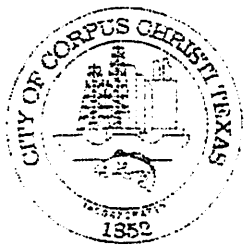
For this particular funding, we strategically chose population as one of the metrics in order to protect the greatest number of citizens. As you are aware, the GLO Guidelines for this funding also require we prioritize regional investments with regional impacts in risk reduction for disasters (Section 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 Farnon
CITY MANAGER

PO Box 4277
Corpus Christi,
Texas 78404-0277
Phone 361-826-3229
Fax 361-826-7836
Peter@cc.texas.com
www.corpusci.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.

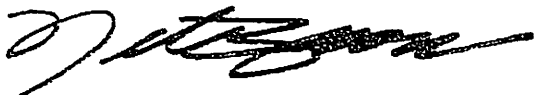
There is precedent for this population distribution in looking at the methodology used by the State of Texas for distributing CARES Act COVID-19 funding to jurisdictions under 500,000 in population. Attachment 1 represents the spreadsheet showing allocation by population for each city and county in the 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

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Anderson County	57,735	36,318	\$1,997,490	\$399,498
Elkhart	1,314	1,314	\$72,270	\$14,454
Frankston	1,221	1,221	\$67,155	\$13,431
Palestine	18,882	18,882	\$1,038,510	\$207,702
	21,417			
Andrews County	18,705	4,052	\$222,860	\$44,572
Andrews	14,653	14,653	\$805,915	\$161,183
	14,653			
Angelina County	86,715	35,532	\$1,954,260	\$390,852
Burke	764	764	\$42,020	\$8,404
Diboll	5,378	5,378	\$295,790	\$59,158
Hudson	5,051	5,051	\$277,805	\$55,561
Huntington	2,201	2,201	\$121,055	\$24,211
Lufkin	37,047	37,047	\$2,037,585	\$407,517
Zavalla	742	742	\$40,810	\$8,162
	51,183			
Aransas County	23,510	11,114	\$611,270	\$122,254
Aransas Pass	733	733	\$40,315	\$8,063
Fulton	1,419	1,419	\$78,045	\$15,609
Rockport	10,244	10,244	\$563,420	\$112,684
	12,396			
Archer County	8,553	2,649	\$145,695	\$29,139
Archer City	1,929	1,929	\$106,095	\$21,219
Holliday	1,792	1,792	\$98,560	\$19,712
Lakeside City (Archer)	1,094	1,094	\$60,170	\$12,034
Megargel	198	198	\$10,890	\$2,178
Scotland	523	523	\$28,765	\$5,753
Windthorst	368	368	\$20,240	\$4,048
	5,904			
Armstrong County	1,887	653	\$35,915	\$7,183
Claude	1,234	1,234	\$67,870	\$13,574
	1,234			
Atascosa County	51,153	25,280	\$1,390,400	\$278,080
Charlotte	1,842	1,842	\$101,310	\$20,262
Christine	435	435	\$23,925	\$4,785
Jourdanton	4,532	4,532	\$249,260	\$49,852
Lytle	2,394	2,394	\$131,670	\$26,334
Pleasanton	10,794	10,794	\$593,670	\$118,734
Poteet	3,482	3,482	\$191,510	\$38,302
Lytle	2,394	2,394	\$131,670	\$26,334
	25,873			
Austin County	30,032	15,479	\$851,345	\$170,269
Bellville	4,523	4,523	\$248,765	\$49,753
Brazos Country	494	494	\$27,170	\$5,434
Industry	337	337	\$18,535	\$3,707
San Felipe	874	874	\$48,070	\$9,614

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Sealy	6,946	6,946	\$382,030	\$76,406
Wallis	1,379	1,379	\$75,845	\$15,169
	14,553			
Bailey County	7,000	1,739	\$95,645	\$19,129
Muleshoe	5,261	5,261	\$289,355	\$57,871
	5,261			
Bandera County	23,112	22,156	\$1,218,580	\$243,716
Bandera	956	956	\$52,580	\$10,516
	956			
Bastrop County	88,723	65,777	\$3,617,735	\$723,547
Bastrop	9,211	9,211	\$506,605	\$101,321
Elgin	9,177	9,177	\$504,735	\$100,947
Smithville	4,558	4,558	\$250,690	\$50,138
	22,946			
Baylor County	3,509	743	\$40,865	\$8,173
Seymour	2,766	2,766	\$152,130	\$30,426
	2,766			
Bee County	32,565	19,121	\$1,051,655	\$210,331
Beeville	13,444	13,444	\$739,420	\$147,884
	13,444			
Bell County	362,924	58,377	\$3,210,735	\$642,147
Bartlett	711	711	\$39,105	\$7,821
Belton	22,281	22,281	\$1,225,455	\$245,091
Harker Heights	32,534	32,534	\$1,789,370	\$357,874
Holland	1,157	1,157	\$63,635	\$12,727
Killeen	151,547	151,547	\$8,335,085	\$1,667,017
Little River-Academy	2,076	2,076	\$114,180	\$22,836
Moody	1,426	1,426	\$78,430	\$15,686
Morgan's Point Resort	4,702	4,702	\$258,610	\$51,722
Nolanville	5,540	5,540	\$304,700	\$60,940
Rogers	1,226	1,226	\$67,430	\$13,486
Salado	2,096	2,096	\$115,280	\$23,056
Temple	77,295	77,295	\$4,251,225	\$850,245
Troy	1,956	1,956	\$107,580	\$21,516
	304,547			
Blanco County	11,931	7,634	\$419,870	\$83,974
Blanco	2,052	2,052	\$112,860	\$22,572
Johnson City	2,059	2,059	\$113,245	\$22,649
Round Mountain	186	186	\$10,230	\$2,046
	4,297			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Borden County	654	654	\$35,970	\$7,194
	654			
Bosque County	18,685	10,344	\$568,920	\$113,784
Clifton	3,562	3,562	\$195,910	\$39,182
Cranfills Gap	289	289	\$15,895	\$3,179
Iredell	340	340	\$18,700	\$3,740
Meridian	1,511	1,511	\$83,105	\$16,621
Morgan	515	515	\$28,325	\$5,665
Valley Mills	1,197	1,197	\$65,835	\$13,167
Walnut Springs	927	927	\$50,985	\$10,197
	8,341			
Bowie County	93,245	31,918	\$1,755,490	\$351,098
De Kalb	1,712	1,712	\$94,160	\$18,832
Hooks	2,774	2,774	\$152,570	\$30,514
Leary	491	491	\$27,005	\$5,401
Maud	1,079	1,079	\$59,345	\$11,869
Nash	3,858	3,858	\$212,190	\$42,438
New Boston	4,660	4,660	\$256,300	\$51,260
Red Lick	1,054	1,054	\$57,970	\$11,594
Redwater	1,126	1,126	\$61,930	\$12,386
Texarkana	38,816	38,816	\$2,134,880	\$426,976
Wake Village	5,757	5,757	\$316,635	\$63,327
	61,327			
Brazoria County	374,264	113,656	\$6,251,080	\$1,250,216
Alvin	28,179	28,179	\$1,549,845	\$309,969
Angleton	20,571	20,571	\$1,131,405	\$226,281
Bailey's Prairie	798	798	\$43,890	\$8,778
Bonney	354	354	\$19,470	\$3,894
Brazoria	3,467	3,467	\$190,685	\$38,137
Brookside Village	1,662	1,662	\$91,410	\$18,282
Clute	12,156	12,156	\$668,580	\$133,716
Danbury	1,878	1,878	\$103,290	\$20,658
Freeport	12,556	12,556	\$690,580	\$138,116
Hillcrest	779	779	\$42,845	\$8,569
Holiday Lakes	1,247	1,247	\$68,585	\$13,717
Iowa Colony	2,229	2,229	\$122,595	\$24,519
Jones Creek	2,195	2,195	\$120,725	\$24,145
Lake Jackson	27,699	27,699	\$1,523,445	\$304,689
Liverpool	573	573	\$31,515	\$6,303
Manvel	13,532	13,532	\$744,260	\$148,852
Oyster Creek	1,199	1,199	\$65,945	\$13,189
Pearland	115,891	115,891	\$6,374,005	\$1,274,801
Quintana	119	119	\$6,545	\$1,309
Richwood	4,247	4,247	\$233,585	\$46,717
Sandy Point	245	245	\$13,475	\$2,695
Surfside Beach	581	581	\$31,955	\$6,391

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Sweeny	4,182	4,182	\$230,010	\$46,002
West Columbia	4,269	4,269	\$234,795	\$46,959
	260,608			
Brazos County	229,211	26,134	\$1,437,370	\$287,474
Bryan	85,224	85,224	\$4,687,320	\$937,464
College Station	116,998	116,998	\$6,434,890	\$1,286,978
Kurten	371	371	\$20,405	\$4,081
Millican	240	240	\$13,200	\$2,640
Wixon Valley	244	244	\$13,420	\$2,684
	203,077			
Brewster County	9,203	3,238	\$178,090	\$35,618
Alpine	5,965	5,965	\$328,075	\$65,615
	5,965			
Briscoe County	1,546	476	\$26,180	\$5,236
Quitaque	379	379	\$20,845	\$4,169
Silverton	691	691	\$38,005	\$7,601
	1,070			
Brooks County	7,093	2,096	\$115,280	\$23,056
Falfurrias	4,997	4,997	\$274,835	\$54,967
	4,997			
Brown County	37,864	12,868	\$707,740	\$141,548
Bangs	1,588	1,588	\$87,340	\$17,468
Blanket	392	392	\$21,560	\$4,312
Brownwood	19,898	19,898	\$1,094,390	\$218,878
Early	3,118	3,118	\$171,490	\$34,298
	24,996			
Burleson County	18,443	11,853	\$651,915	\$130,383
Caldwell	4,538	4,538	\$249,590	\$49,918
Snook	541	541	\$29,755	\$5,951
Somerville	1,511	1,511	\$83,105	\$16,621
	6,590			
Burnet County	48,155	22,983	\$1,264,065	\$252,813
Bertram	1,617	1,617	\$88,935	\$17,787
Burnet	6,881	6,881	\$378,455	\$75,691
Cottonwood Shores	1,345	1,345	\$73,975	\$14,795
Granite Shoals	5,117	5,117	\$281,435	\$56,287
Highland Haven	433	433	\$23,815	\$4,763
Horeshoe Bay	827	827	\$45,485	\$9,097
Marble Falls	7,125	7,125	\$391,875	\$78,375
Meadowlakes	1,827	1,827	\$100,485	\$20,097

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	25,172			
Caldwell County	43,664	21,317	\$1,172,435	\$234,487
Lockhart	13,889	13,889	\$763,895	\$152,779
Luling	6,016	6,016	\$330,880	\$66,176
Martindale	1,265	1,265	\$69,575	\$13,915
Mustang Ridge	478	478	\$26,290	\$5,258
Niederwald	118	118	\$6,490	\$1,298
Uhland	581	581	\$31,955	\$6,391
	22,347			
Calhoun County	21,290	6,631	\$364,705	\$72,941
Point Comfort	702	702	\$38,610	\$7,722
Port Lavaca	12,433	12,433	\$683,815	\$136,763
Seadrift	1,524	1,524	\$83,820	\$16,764
	14,659			
Callahan County	13,943	7,305	\$401,775	\$80,355
Baird	1,534	1,534	\$84,370	\$16,874
Clyde	3,992	3,992	\$219,560	\$43,912
Cross Plains	1,015	1,015	\$55,825	\$11,165
Putnam	97	97	\$5,335	\$1,067
	6,638			
Cameron County	423,163	100,076	\$5,504,180	\$1,100,836
Bayview	408	408	\$22,440	\$4,488
Brownsville	185,625	185,625	\$10,209,375	\$2,041,875
Combes	3,107	3,107	\$170,885	\$34,177
Harlingen	68,328	68,328	\$3,758,040	\$751,608
Indian Lake	860	860	\$47,300	\$9,460
La Feria	7,814	7,814	\$429,770	\$85,954
Los Fresnos (Cameron)	8,030	8,030	\$441,650	\$88,330
Los Indios	1,060	1,060	\$58,300	\$11,660
Palm Valley	1,259	1,259	\$69,245	\$13,849
Port Isabel	5,130	5,130	\$282,150	\$56,430
Primera	5,146	5,146	\$283,030	\$56,606
Rancho Viejo (Cameron)	2,573	2,573	\$141,515	\$28,303
Rangerville	355	355	\$19,525	\$3,905
Rio Hondo	2,720	2,720	\$149,600	\$29,920
San Benito	24,640	24,640	\$1,355,200	\$271,040
Santa Rosa (Cameron)	2,758	2,758	\$151,690	\$30,338
Solis CDP	441	441	\$24,255	\$4,851
South Padre Island	2,833	2,833	\$155,815	\$31,163
	323,087			
Camp County	13,094	8,299	\$456,445	\$91,289
Pittsburg	4,724	4,724	\$259,820	\$51,964
Rocky Mound	71	71	\$3,905	\$781
	4,795			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Carson County	5,926	1,463	\$80,465	\$16,093
Groom	563	563	\$30,965	\$6,193
Panhandle	2,430	2,430	\$133,650	\$26,730
Skellytown	456	456	\$25,080	\$5,016
White Deer	1,014	1,014	\$55,770	\$11,154
	4,463			
Cass County	30,026	17,837	\$981,035	\$196,207
Atlanta	5,683	5,683	\$312,565	\$62,513
Avinger	444	444	\$24,420	\$4,884
Bloomburg	418	418	\$22,990	\$4,598
Domino	108	108	\$5,940	\$1,188
Douglasville	223	223	\$12,265	\$2,453
Hughes Springs	1,730	1,730	\$95,150	\$19,030
Linden	1,967	1,967	\$108,185	\$21,637
Marietta	132	132	\$7,260	\$1,452
Queen City	1,484	1,484	\$81,620	\$16,324
	12,189			
Castro County	7,530	1,988	\$109,340	\$21,868
Dimmitt	4,174	4,174	\$229,570	\$45,914
Hart	1,064	1,064	\$58,520	\$11,704
Nazareth	304	304	\$16,720	\$3,344
	5,542			
Chambers County	43,837	26,702	\$1,468,610	\$293,722
Anahuac	2,508	2,508	\$137,940	\$27,588
Baytown	4,145	4,145	\$227,975	\$45,595
Beach City	2,736	2,736	\$150,480	\$30,096
Cove	550	550	\$30,250	\$6,050
Mont Belvieu	5,933	5,933	\$326,315	\$65,263
Old River-Winfree	1,263	1,263	\$69,465	\$13,893
	17,135			
Cherokee County	52,646	27,488	\$1,511,840	\$302,368
Alto	1,282	1,282	\$70,510	\$14,102
Bullard	66	66	\$3,630	\$726
Cuney	138	138	\$7,590	\$1,518
Gallatin	440	440	\$24,200	\$4,840
Jacksonville	15,138	15,138	\$832,590	\$166,518
New Summerfield	1,214	1,214	\$66,770	\$13,354
Reklaw	225	225	\$12,375	\$2,475
Rusk	5,745	5,745	\$315,975	\$63,195
Troup	64	64	\$3,520	\$704
Wells	846	846	\$46,530	\$9,306
	25,158			
Childress County	7,306	1,111	\$61,105	\$12,221

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Childress	6,195	6,195	\$340,725	\$68,145
	6,195			
Clay County	10,471	5,252	\$288,860	\$57,772
Bellevue	350	350	\$19,250	\$3,850
Byers	477	477	\$26,235	\$5,247
Dean	474	474	\$26,070	\$5,214
Henrietta	3,071	3,071	\$168,905	\$33,781
Jolly	160	160	\$8,800	\$1,760
Petrolia	670	670	\$36,850	\$7,370
Windthorst	17	17	\$935	\$187
	5,219			
Cochran County	2,853	633	\$34,815	\$6,963
Morton	1,781	1,781	\$97,955	\$19,591
Whiteface	439	439	\$24,145	\$4,829
	2,220			
Coke County	3,387	1,300	\$71,500	\$14,300
Bronte	999	999	\$54,945	\$10,989
Robert Lee	1,073	1,073	\$59,015	\$11,803
Blackwell	15	15	\$825	\$165
	2,087			
Coleman County	8,175	2,555	\$140,525	\$28,105
Coleman	4,432	4,432	\$243,760	\$48,752
Novice	137	137	\$7,535	\$1,507
Santa Anna (Coleman)	1,051	1,051	\$57,805	\$11,561
	5,620			
Collingsworth County	2,920	772	\$42,460	\$8,492
Dodson	104	104	\$5,720	\$1,144
Wellington	2,044	2,044	\$112,420	\$22,484
	2,148			
Colorado County	21,493	11,839	\$651,145	\$130,229
Columbus	3,715	3,715	\$204,325	\$40,865
Eagle Lake	3,699	3,699	\$203,445	\$40,689
Weimar	2,240	2,240	\$123,200	\$24,640
	9,654			
Comal County	156,209	74,513	\$4,098,215	\$819,643
Bulverde	5,783	5,783	\$318,065	\$63,613
Fair Oaks Ranch	424	424	\$23,320	\$4,664
Garden Ridge	4,121	4,121	\$226,655	\$45,331
New Braunfels	69,915	69,915	\$3,845,325	\$769,065
Schertz	1,171	1,171	\$64,405	\$12,881

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Selma	27	27	\$1,485	\$297
Spring Branch	255	255	\$14,025	\$2,805
	81,696			
Comanche County	13,635	6,551	\$360,305	\$72,061
Comanche	4,351	4,351	\$239,305	\$47,861
De Leon	2,237	2,237	\$123,035	\$24,607
Gustine	496	496	\$27,280	\$5,456
	7,084			
Concho County	2,726	1,143	\$62,865	\$12,573
Eden	1,460	1,460	\$80,300	\$16,060
Paint Rock	123	123	\$6,765	\$1,353
	1,583			
Cooke County	41,257	20,433	\$1,123,815	\$224,763
Callisburg	382	382	\$21,010	\$4,202
Gainesville	16,639	16,639	\$915,145	\$183,029
Lindsay (Cooke)	1,127	1,127	\$61,985	\$12,397
Muenster	1,634	1,634	\$89,870	\$17,974
Oak Ridge (Cooke)	200	200	\$11,000	\$2,200
Valley View	842	842	\$46,310	\$9,262
	20,824			
Coryell County	75,951	26,781	\$1,472,955	\$294,591
Copperas Cove	31,989	31,989	\$1,759,395	\$351,879
Gatesville	16,078	16,078	\$884,290	\$176,858
Oglesby	469	469	\$25,795	\$5,159
South Mountain	362	362	\$19,910	\$3,982
Evant	272	272	\$14,960	\$2,992
	49,170			
Cottle County	1,398	331	\$18,205	\$3,641
Paducah	1,067	1,067	\$58,685	\$11,737
	1,067			
Crane County	4,797	1,211	\$66,605	\$13,321
Crane	3,586	3,586	\$197,230	\$39,446
	3,586			
Crockett County	3,464	3,464	\$190,520	\$38,104
	3,464			
Crosby County	5,737	1,149	\$63,195	\$12,639
Crosbyton	1,594	1,594	\$87,670	\$17,534
Lorenzo	1,160	1,160	\$63,800	\$12,760
Ralls	1,834	1,834	\$100,870	\$20,174

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	4,588			
Culberson County	2,171	319	\$17,545	\$3,509
Van Horn	1,852	1,852	\$101,860	\$20,372
	1,852			
Dallam County	7,287	1,134	\$62,370	\$12,474
Dalhart	5,622	5,622	\$309,210	\$61,842
Texline	531	531	\$29,205	\$5,841
	6,153			
Dawson County	12,728	3,380	\$185,900	\$37,180
Lamesa	8,816	8,816	\$484,880	\$96,976
Los Ybanez	17	17	\$935	\$187
O' Donnell	115	115	\$6,325	\$1,265
Welch CDP	246	246	\$13,530	\$2,706
Ackerly	154	154	\$8,470	\$1,694
	9,348			
Deaf Smith	18,546	3,033	\$166,815	\$33,363
Hereford	15,513	15,513	\$853,215	\$170,643
	15,513			
Delta County	5,331	3,174	\$174,570	\$34,914
Cooper	1,967	1,967	\$108,185	\$21,637
Pecan Gap	190	190	\$10,450	\$2,090
	2,157			
DeWitt County	20,160	8,060	\$443,300	\$88,660
Cuero	7,545	7,545	\$414,975	\$82,995
Nordheim	316	316	\$17,380	\$3,476
Yoakum	2,101	2,101	\$115,555	\$23,111
Yorktown	2,138	2,138	\$117,590	\$23,518
	12,100			
Dickens County	2,211	717	\$39,435	\$7,887
Dickens	261	261	\$14,355	\$2,871
Spur	1,233	1,233	\$67,815	\$13,563
	1,494			
Dimmit County	10,124	2,554	\$140,470	\$28,094
Asherton	1,039	1,039	\$57,145	\$11,429
Big Wells	679	679	\$37,345	\$7,469
Carrizo Springs	5,852	5,852	\$321,860	\$64,372
	7,570			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Donley County	3,278	766	\$42,130	\$8,426
Clarendon	1,844	1,844	\$101,420	\$20,284
Hedley	295	295	\$16,225	\$3,245
Howardwick	373	373	\$20,515	\$4,103
	2,512			
Duval County	11,157	3,945	\$216,975	\$43,395
Benavides	1,241	1,241	\$68,255	\$13,651
Freer	2,627	2,627	\$144,485	\$28,897
San Diego	3,344	3,344	\$183,920	\$36,784
	7,212			
Eastland County	18,360	5,896	\$324,280	\$64,856
Carbon	264	264	\$14,520	\$2,904
Cisco	3,860	3,860	\$212,300	\$42,460
Eastland	4,052	4,052	\$222,860	\$44,572
Gorman	1,038	1,038	\$57,090	\$11,418
Ranger	2,414	2,414	\$132,770	\$26,554
Rising Star	836	836	\$45,980	\$9,196
	12,464			
Ector County	166,223	47,511	\$2,613,105	\$522,621
Goldsmith	269	269	\$14,795	\$2,959
Odessa	118,443	118,443	\$6,514,365	\$1,302,873
	118,712			
Edwards County	1,932	802	\$44,110	\$8,822
Rocksprings	1,130	1,130	\$62,150	\$12,430
	1,130			
Ellis County	184,826	62,926	\$3,460,930	\$692,186
Alma	400	400	\$22,000	\$4,400
Bardwell	723	723	\$39,765	\$7,953
Cedar Hill	559	559	\$30,745	\$6,149
Ennis	21,042	21,042	\$1,157,310	\$231,462
Ferris	2,820	2,820	\$155,100	\$31,020
Garrett	935	935	\$51,425	\$10,285
Glenn Heights	3,049	3,049	\$167,695	\$33,539
Grand Prairie	28	28	\$1,540	\$308
Italy	1,957	1,957	\$107,635	\$21,527
Mansfield	119	119	\$6,545	\$1,309
Maypearl	1,146	1,146	\$63,030	\$12,606
Midlothian	28,301	28,301	\$1,556,555	\$311,311
Milford	764	764	\$42,020	\$8,404
Oak Leaf	1,479	1,479	\$81,345	\$16,269
Palmer	2,234	2,234	\$122,870	\$24,574

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Pecan Hill	689	689	\$37,895	\$7,579
Red Oak	13,153	13,153	\$723,415	\$144,683
Waxahachie	38,643	38,643	\$2,125,365	\$425,073
Ovilla	3,773	3,773	\$207,515	\$41,503
Venus	86	86	\$4,730	\$946
	121,900			
Erath County	42,698	17,021	\$936,155	\$187,231
Dublin	3,612	3,612	\$198,660	\$39,732
Stephenville	22,065	22,065	\$1,213,575	\$242,715
	25,677			
Falls County	17,297	9,078	\$499,290	\$99,858
Bruceville-Eddy	4	4	\$220	\$44
Lott	782	782	\$43,010	\$8,602
Marlin	5,665	5,665	\$311,575	\$62,315
Rosebud	1,344	1,344	\$73,920	\$14,784
Golinda	424	424	\$23,320	\$4,664
	8,219			
Fannin County	35,514	17,079	\$939,345	\$187,869
Bailey	304	304	\$16,720	\$3,344
Bonham	10,672	10,672	\$586,960	\$117,392
Dodd City	384	384	\$21,120	\$4,224
Ector	726	726	\$39,930	\$7,986
Honey Grove	1,664	1,664	\$91,520	\$18,304
Ladonia	626	626	\$34,430	\$6,886
Leonard	2,080	2,080	\$114,400	\$22,880
Pecan Gap	12	12	\$660	\$132
Ravenna	213	213	\$11,715	\$2,343
Savoy	846	846	\$46,530	\$9,306
Trenton	692	692	\$38,060	\$7,612
Whitewright	8	8	\$440	\$88
Windom	208	208	\$11,440	\$2,288
	18,435			
Fayette County	25,346	15,532	\$854,260	\$170,852
Carmine	258	258	\$14,190	\$2,838
Fayetteville	271	271	\$14,905	\$2,981
Flatonia	1,511	1,511	\$83,105	\$16,621
La Grange	4,751	4,751	\$261,305	\$52,261
Round Top	88	88	\$4,840	\$968
Schulenburg	2,935	2,935	\$161,425	\$32,285
	9,814			
Fisher	3,830	1,816	\$99,880	\$19,976
Roby	606	606	\$33,330	\$6,666
Rotan	1,408	1,408	\$77,440	\$15,488

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	2,014			
Floyd County	5,712	1,397	\$76,835	\$15,367
Floydada	2,670	2,670	\$146,850	\$29,370
Lockney	1,645	1,645	\$90,475	\$18,095
	4,315			
Foard	1,155	297	\$16,335	\$3,267
Crowell	858	858	\$47,190	\$9,438
	858			
Franklin County	10,725	7,287	\$400,785	\$80,157
Mount Vernon	2,739	2,739	\$150,645	\$30,129
Winnsboro	699	699	\$38,445	\$7,689
	3,438			
Freestone County	19,717	11,647	\$640,585	\$128,117
Fairfield	2,980	2,980	\$163,900	\$32,780
Kirvin	137	137	\$7,535	\$1,507
Oakwood	37	37	\$2,035	\$407
Teague	3,588	3,588	\$197,340	\$39,468
Wortham	1,076	1,076	\$59,180	\$11,836
Streetman	252	252	\$13,860	\$2,772
	8,070			
Frio County	20,306	5,245	\$288,475	\$57,695
Dilley	4,405	4,405	\$242,275	\$48,455
Pearsall	10,656	10,656	\$586,080	\$117,216
	15,061			
Gaines County	21,492	10,965	\$603,075	\$120,615
Seagraves	2,886	2,886	\$158,730	\$31,746
Seminole	7,641	7,641	\$420,255	\$84,051
	10,527			
Galveston County	342,139	41,865	\$2,302,575	\$460,515
Bayou Vista	1,648	1,648	\$90,640	\$18,128
Clear Lake Shores	1,164	1,164	\$64,020	\$12,804
Dickinson	21,532	21,532	\$1,184,260	\$236,852
Friendswood	28,606	28,606	\$1,573,330	\$314,666
Galveston	49,638	49,638	\$2,730,090	\$546,018
Hitchcock	7,855	7,855	\$432,025	\$86,405
Jamaica Beach	1,080	1,080	\$59,400	\$11,880
Kemah	2,047	2,047	\$112,585	\$22,517
La Marque	16,817	16,817	\$924,935	\$184,987
League City	104,260	104,260	\$5,734,300	\$1,146,860
Santa Fe	13,624	13,624	\$749,320	\$149,864

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Texas City	50,946	50,946	\$2,802,030	\$560,406
Tiki Island	1,057	1,057	\$58,135	\$11,627
	300,274			
Garza County	6,229	921	\$50,655	\$10,131
Post	5,308	5,308	\$291,940	\$58,388
	5,308			
Gillespie County	26,988	15,459	\$850,245	\$170,049
Fredericksburg	11,529	11,529	\$634,095	\$126,819
	11,529			
Glasscock County	1,409	1,409	\$77,495	\$15,499
	1,409			
Goliad County	7,658	5,600	\$308,000	\$61,600
Goliad	2,058	2,058	\$113,190	\$22,638
	2,058			
Gonzales County	20,837	9,099	\$500,445	\$100,089
Gonzales	7,571	7,571	\$416,405	\$83,281
Nixon	2,463	2,463	\$135,465	\$27,093
Smiley	556	556	\$30,580	\$6,116
Waelder	1,148	1,148	\$63,140	\$12,628
	11,738			
Gray County	21,886	3,593	\$197,615	\$39,523
Lefors	472	472	\$25,960	\$5,192
McLean	747	747	\$41,085	\$8,217
Pampa	17,074	17,074	\$939,070	\$187,814
	18,293			
Grayson County	136,212	40,209	\$2,211,495	\$442,299
Bells	1,552	1,552	\$85,360	\$17,072
Collinsville	1,998	1,998	\$109,890	\$21,978
Denison	25,631	25,631	\$1,409,705	\$281,941
Dorchester	168	168	\$9,240	\$1,848
Gunter	1,663	1,663	\$91,465	\$18,293
Howe	3,610	3,610	\$198,550	\$39,710
Knollwood	554	554	\$30,470	\$6,094
Pottsboro	2,522	2,522	\$138,710	\$27,742
Sadler	345	345	\$18,975	\$3,795
Sherman	44,192	44,192	\$2,430,560	\$486,112
Southmayd	1,107	1,107	\$60,885	\$12,177
Tioga	1,019	1,019	\$56,045	\$11,209
Tom Bean	1,150	1,150	\$63,250	\$12,650
Van Alstyne	4,658	4,658	\$256,190	\$51,238

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Whitesboro	4,139	4,139	\$227,645	\$45,529
Whitewright	1,695	1,695	\$93,225	\$18,645
	96,003			
Gregg County	123,945	19,836	\$1,090,980	\$218,196
Clarksville City	924	924	\$50,820	\$10,164
Easton	458	458	\$25,190	\$5,038
Gladewater	3,886	3,886	\$213,730	\$42,746
Kilgore	11,332	11,332	\$623,260	\$124,652
Lakeport	1,056	1,056	\$58,080	\$11,616
Longview	79,690	79,690	\$4,382,950	\$876,590
Warren City	294	294	\$16,170	\$3,234
White Oak	6,469	6,469	\$355,795	\$71,159
	104,109			
Grimes County	28,880	18,716	\$1,029,380	\$205,876
Anderson	240	240	\$13,200	\$2,640
Bedias	485	485	\$26,675	\$5,335
Iola	444	444	\$24,420	\$4,884
Navasota	7,937	7,937	\$436,535	\$87,307
Plantersville	938	938	\$51,590	\$10,318
Todd Mission	120	120	\$6,600	\$1,320
	10,164			
Guadalupe County	166,847	46,334	\$2,548,370	\$509,674
Cibolo	31,066	31,066	\$1,708,630	\$341,726
Kingsbury	130	130	\$7,150	\$1,430
Marion	1,241	1,241	\$68,255	\$13,651
New Berlin	608	608	\$33,440	\$6,688
New Braunfels	14,697	14,697	\$808,335	\$161,667
Santa Clara	733	733	\$40,315	\$8,063
Schertz	37,860	37,860	\$2,082,300	\$416,460
Seguin	31,239	31,239	\$1,718,145	\$343,629
Selma	2,668	2,668	\$146,740	\$29,348
Staples	271	271	\$14,905	\$2,981
	120,513			
Hale County	33,406	4,583	\$252,065	\$50,413
Edmondson	103	103	\$5,665	\$1,133
Hale Center	2,097	2,097	\$115,335	\$23,067
Petersburg	1,149	1,149	\$63,195	\$12,639
Plainview	20,740	20,740	\$1,140,700	\$228,140
Abernathy	1,970	1,970	\$108,350	\$21,670
Estelline	138	138	\$7,590	\$1,518
Lakeview	95	95	\$5,225	\$1,045
Memphis	2,148	2,148	\$118,140	\$23,628
Turkey	383	383	\$21,065	\$4,213
	28,823			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Hall County	2,964	293	\$16,115	\$3,223
Estelline	131	131	\$7,205	\$1,441
Lakeview	98	98	\$5,390	\$1,078
Memphis	2,058	2,058	\$113,190	\$22,638
Turkey	384	384	\$21,120	\$4,224
	2,671			
Hamilton County	8,461	3,704	\$203,720	\$40,744
Evant	136	136	\$7,480	\$1,496
Hamilton	3,159	3,159	\$173,745	\$34,749
Hico	1,462	1,462	\$80,410	\$16,082
	4,757			
Hansford County	5,399	971	\$53,405	\$10,681
Gruver	1,137	1,137	\$62,535	\$12,507
Spearman	3,291	3,291	\$181,005	\$36,201
	4,428			
Hardeman County	3,933	893	\$49,115	\$9,823
Chillicothe	652	652	\$35,860	\$7,172
Quanah	2,388	2,388	\$131,340	\$26,268
	3,040			
Hardin County	57,602	33,468	\$1,840,740	\$368,148
Kountze	2,130	2,130	\$117,150	\$23,430
Lumberton	12,834	12,834	\$705,870	\$141,174
Rose Hill Acres	415	415	\$22,825	\$4,565
Silsbee	6,815	6,815	\$374,825	\$74,965
Sour Lake	1,940	1,940	\$106,700	\$21,340
	24,134			
Harrison County	66,553	32,816	\$1,804,880	\$360,976
Hallsville	4,335	4,335	\$238,425	\$47,685
Longview	1,957	1,957	\$107,635	\$21,527
Marshall	24,444	24,444	\$1,344,420	\$268,884
Nesbitt	269	269	\$14,795	\$2,959
Scottsville	370	370	\$20,350	\$4,070
Uncertain	94	94	\$5,170	\$1,034
Waskom	2,268	2,268	\$124,740	\$24,948
	33,737			
Hartley County	5,576	2,565	\$141,075	\$28,215
Channing	337	337	\$18,535	\$3,707
Dalhart	2,674	2,674	\$147,070	\$29,414
	3,011			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Haskell County	5,658	1,145	\$62,975	\$12,595
Haskell	3,266	3,266	\$179,630	\$35,926
O'Brien	104	104	\$5,720	\$1,144
Rochester	316	316	\$17,380	\$3,476
Rule	623	623	\$34,265	\$6,853
Stamford	34	34	\$1,870	\$374
Weinert	170	170	\$9,350	\$1,870
	4,513			
Hays County	230,191	87,832	\$4,830,760	\$966,152
Bear Creek	455	455	\$25,025	\$5,005
Buda	18,323	18,323	\$1,007,765	\$201,553
Dripping Springs	3,967	3,967	\$218,185	\$43,637
Hays	263	263	\$14,465	\$2,893
Kyle	46,174	46,174	\$2,539,570	\$507,914
Mountain City	797	797	\$43,835	\$8,767
Niederwald	488	488	\$26,840	\$5,368
San Marcos	66,466	66,466	\$3,655,630	\$731,126
Uhland	612	612	\$33,660	\$6,732
Wimberley	3,127	3,127	\$171,985	\$34,397
Woodcreek	1,687	1,687	\$92,785	\$18,557
	142,359			
Hemphill County	3,819	1,106	\$60,830	\$12,166
Canadian	2,713	2,713	\$149,215	\$29,843
	2,713			
Henderson County	82,737	43,258	\$2,379,190	\$475,838
Athens	13,571	13,571	\$746,405	\$149,281
Berryville	1,058	1,058	\$58,190	\$11,638
Brownsboro	1,259	1,259	\$69,245	\$13,849
Caney City	226	226	\$12,430	\$2,486
Chandler	3,118	3,118	\$171,490	\$34,298
Coffee City	1,465	1,465	\$80,575	\$16,115
Enchanted Oaks	339	339	\$18,645	\$3,729
Eustace	1,011	1,011	\$55,605	\$11,121
Gun Barrel City	6,157	6,157	\$338,635	\$67,727
Log Cabin	784	784	\$43,120	\$8,624
Mabank	884	884	\$48,620	\$9,724
Malakoff	2,442	2,442	\$134,310	\$26,862
Moore Station	205	205	\$11,275	\$2,255
Murchison	611	611	\$33,605	\$6,721
Payne Springs	798	798	\$43,890	\$8,778
Poynor	319	319	\$17,545	\$3,509
Seven Points	1,445	1,445	\$79,475	\$15,895
Star Harbor	492	492	\$27,060	\$5,412
Tool	2,404	2,404	\$132,220	\$26,444
Trinidad	891	891	\$49,005	\$9,801
	39,479			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Hill County	36,649	20,237	\$1,113,035	\$222,607
Abbott	376	376	\$20,680	\$4,136
Aquilla	114	114	\$6,270	\$1,254
Blum	472	472	\$25,960	\$5,192
Bynum	205	205	\$11,275	\$2,255
Carl's Corner	178	178	\$9,790	\$1,958
Covington	282	282	\$15,510	\$3,102
Hillsboro	8,544	8,544	\$469,920	\$93,984
Hubbard	1,394	1,394	\$76,670	\$15,334
Itasca	1,727	1,727	\$94,985	\$18,997
Malone	276	276	\$15,180	\$3,036
Mertens	128	128	\$7,040	\$1,408
Mount Calm	332	332	\$18,260	\$3,652
Penelope	207	207	\$11,385	\$2,277
Whitney	2,177	2,177	\$119,735	\$23,947
	16,412			
Hockley County	23,021	5,699	\$313,445	\$62,689
Anton	1,105	1,105	\$60,775	\$12,155
Levelland	13,732	13,732	\$755,260	\$151,052
Opdyke West	179	179	\$9,845	\$1,969
Ropesville	422	422	\$23,210	\$4,642
Smyer	474	474	\$26,070	\$5,214
Sundown	1,410	1,410	\$77,550	\$15,510
	17,322			
Hood County	61,643	45,971	\$2,528,405	\$505,681
Cresson	312	312	\$17,160	\$3,432
DeCordova	3,043	3,043	\$167,365	\$33,473
Granbury	10,524	10,524	\$578,820	\$115,764
Lipan	483	483	\$26,565	\$5,313
Stockton Bend City	325	325	\$17,875	\$3,575
Tolar	985	985	\$54,175	\$10,835
	15,672			
Hopkins County	37,084	19,013	\$1,045,715	\$209,143
Como	746	746	\$41,030	\$8,206
Cumby	813	813	\$44,715	\$8,943
Sulphur Springs	16,199	16,199	\$890,945	\$178,189
Tira	313	313	\$17,215	\$3,443
	18,071			
Houston County	22,968	13,542	\$744,810	\$148,962
Crockett	6,707	6,707	\$368,885	\$73,777
Grapeland	1,419	1,419	\$78,045	\$15,609
Kennard	330	330	\$18,150	\$3,630
Latexo	332	332	\$18,260	\$3,652
Lovelady	638	638	\$35,090	\$7,018

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	9,426			
Howard County	36,664	7,402	\$407,110	\$81,422
Big Spring	28,156	28,156	\$1,548,580	\$309,716
Coahoma	887	887	\$48,785	\$9,757
Forsan	219	219	\$12,045	\$2,409
	29,262			
Hudspeth County	4,886	4,508	\$247,940	\$49,588
Dell City	378	378	\$20,790	\$4,158
	378			
Hunt County	98,594	49,293	\$2,711,115	\$542,223
Caddo Mills	1,706	1,706	\$93,830	\$18,766
Campbell	666	666	\$36,630	\$7,326
Celeste	925	925	\$50,875	\$10,175
Commerce	9,786	9,786	\$538,230	\$107,646
Greenville	28,851	28,851	\$1,586,805	\$317,361
Hawk Cove	554	554	\$30,470	\$6,094
Josephine	109	109	\$5,995	\$1,199
Lone Oak	676	676	\$37,180	\$7,436
Neylandville	106	106	\$5,830	\$1,166
Quinlan	1,565	1,565	\$86,075	\$17,215
Union Valley	399	399	\$21,945	\$4,389
Royse City	654	654	\$35,970	\$7,194
West Tawakoni	1,775	1,775	\$97,625	\$19,525
Wolfe City	1,529	1,529	\$84,095	\$16,819
	49,301			
Hutchinson County	20,938	4,621	\$254,155	\$50,831
Borger	12,437	12,437	\$684,035	\$136,807
Fritch	1,971	1,971	\$108,405	\$21,681
Sanford	153	153	\$8,415	\$1,683
Stinnett	1,756	1,756	\$96,580	\$19,316
	16,317			
Irion County	1,536	701	\$38,555	\$7,711
Mertzon	835	835	\$45,925	\$9,185
	835			
Jack County	8,935	3,841	\$211,255	\$42,251
Bryson	579	579	\$31,845	\$6,369
Jacksboro	4,515	4,515	\$248,325	\$49,665
	5,094			
Jackson County	14,760	6,351	\$349,305	\$69,861

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Edna	5,908	5,908	\$324,940	\$64,988
Ganado	2,282	2,282	\$125,510	\$25,102
La Ward	219	219	\$12,045	\$2,409
	8,409			
Jasper	35,529	25,403	\$1,397,165	\$279,433
Browndell	204	204	\$11,220	\$2,244
Jasper	7,665	7,665	\$421,575	\$84,315
Kirbyville	2,257	2,257	\$124,135	\$24,827
	10,126			
Jeff Davis County	2,274	2,149	\$118,195	\$23,639
Valentine	125	125	\$6,875	\$1,375
	125			
Jefferson County	251,565	28,148	\$1,548,140	\$309,628
Beaumont	119,780	119,780	\$6,587,900	\$1,317,580
Bevil Oaks	1,233	1,233	\$67,815	\$13,563
China	1,215	1,215	\$66,825	\$13,365
Groves	15,907	15,907	\$874,885	\$174,977
Nederland	17,302	17,302	\$951,610	\$190,322
Nome	596	596	\$32,780	\$6,556
Port Arthur	54,440	54,440	\$2,994,200	\$598,840
Port Neches	12,733	12,733	\$700,315	\$140,063
Taylor Landing	211	211	\$11,605	\$2,321
	223,417			
Jim Hogg County	5,200	5,200	\$286,000	\$57,200
	5,200			
Jim Wells County	40,482	16,433	\$903,815	\$180,763
Alice	18,862	18,862	\$1,037,410	\$207,482
Orange Grove	1,309	1,309	\$71,995	\$14,399
Premont	2,554	2,554	\$140,470	\$28,094
San Diego	907	907	\$49,885	\$9,977
Westdale CDP	417	417	\$22,935	\$4,587
	24,049			
Johnson County	175,817	75,504	\$4,152,720	\$830,544
Alvarado	4,574	4,574	\$251,570	\$50,314
Briaroaks	505	505	\$27,775	\$5,555
Burleson	37,357	37,357	\$2,054,635	\$410,927
Cleburne	32,335	32,335	\$1,778,425	\$355,685
Coyote Flats City	331	331	\$18,205	\$3,641
Cresson	143	143	\$7,865	\$1,573
Cross Timber	324	324	\$17,820	\$3,564
Crowley	35	35	\$1,925	\$385
Godley	1,290	1,290	\$70,950	\$14,190

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Grandview	1,803	1,803	\$99,165	\$19,833
Joshua	7,788	7,788	\$428,340	\$85,668
Keene	6,815	6,815	\$374,825	\$74,965
Mansfield	2,173	2,173	\$119,515	\$23,903
Rio Vista	1,073	1,073	\$59,015	\$11,803
Venus	3,767	3,767	\$207,185	\$41,437
	100,313			
Jones County	20,083	6,239	\$343,145	\$68,629
Abilene	5,637	5,637	\$310,035	\$62,007
Anson	2,330	2,330	\$128,150	\$25,630
Hamlin	2,031	2,031	\$111,705	\$22,341
Hawley	630	630	\$34,650	\$6,930
Lueders	327	327	\$17,985	\$3,597
Stamford	2,889	2,889	\$158,895	\$31,779
	13,844			
Karnes County	15,601	7,042	\$387,310	\$77,462
Falls City	674	674	\$37,070	\$7,414
Karnes City	3,202	3,202	\$176,110	\$35,222
Kenedy	3,525	3,525	\$193,875	\$38,775
Runge	1,158	1,158	\$63,690	\$12,738
	8,559			
Kaufman County	136,154	69,411	\$3,817,605	\$763,521
Combine	1,423	1,423	\$78,265	\$15,653
Cottonwood	215	215	\$11,825	\$2,365
Crandall	3,477	3,477	\$191,235	\$38,247
Forney	25,371	25,371	\$1,395,405	\$279,081
Grays Prairie	378	378	\$20,790	\$4,158
Kaufman	7,565	7,565	\$416,075	\$83,215
Kemp	1,268	1,268	\$69,740	\$13,948
Mabank	2,821	2,821	\$155,155	\$31,031
Mesquite	132	132	\$7,260	\$1,452
Oak Grove	702	702	\$38,610	\$7,722
Oak Ridge (Kaufman)	661	661	\$36,355	\$7,271
Post Oak Bend City	688	688	\$37,840	\$7,568
Rosser	382	382	\$21,010	\$4,202
Scurry	772	772	\$42,460	\$8,492
Seagoville	25	25	\$1,375	\$275
Seven Points	79	79	\$4,345	\$869
Talty	2,664	2,664	\$146,520	\$29,304
Terrell	18,120	18,120	\$996,600	\$199,320
	66,743			
Kendall County	47,431	28,260	\$1,554,300	\$310,860
Boerne	16,892	16,892	\$929,060	\$185,812
Fair Oaks Ranch	2,279	2,279	\$125,345	\$25,069
	19,171			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Kenedy County	404	404	\$22,220	\$4,444
	404			
Kent County	762	270	\$14,850	\$2,970
Jayton	492	492	\$27,060	\$5,412
	492			
Kerr County	52,600	26,527	\$1,458,985	\$291,797
Ingram	1,848	1,848	\$101,640	\$20,328
Kerrville	24,225	24,225	\$1,332,375	\$266,475
	26,073			
Kimble County	4,337	1,760	\$96,800	\$19,360
Junction	2,577	2,577	\$141,735	\$28,347
	2,577			
King County	272	272	\$14,960	\$2,992
	272			
Kinney County	3,667	1,779	\$97,845	\$19,569
Brackettville	1,785	1,785	\$98,175	\$19,635
Spofford	103	103	\$5,665	\$1,133
	1,888			
Kleberg County	30,680	5,286	\$290,730	\$58,146
Kingsville	25,394	25,394	\$1,396,670	\$279,334
	25,394			
Knox County	3,664	1,010	\$55,550	\$11,110
Benjamin	238	238	\$13,090	\$2,618
Goree	184	184	\$10,120	\$2,024
Knox City	1,063	1,063	\$58,465	\$11,693
Munday	1,169	1,169	\$64,295	\$12,859
	2,654			
La Salle County	7,520	2,908	\$159,940	\$31,988
Cotulla	4,005	4,005	\$220,275	\$44,055
Encinal	607	607	\$33,385	\$6,677
	4,612			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Lamar County	49,859	18,227	\$1,002,485	\$200,497
Blossom	1,568	1,568	\$86,240	\$17,248
Deport	562	562	\$30,910	\$6,182
Paris	25,330	25,330	\$1,393,150	\$278,630
Reno (Lamar)	3,362	3,362	\$184,910	\$36,982
Roxton	656	656	\$36,080	\$7,216
Sun Valley	82	82	\$4,510	\$902
Toco	72	72	\$3,960	\$792
	31,632			
Lamb County	12,893	2,328	\$128,040	\$25,608
Amherst	643	643	\$35,365	\$7,073
Earth	972	972	\$53,460	\$10,692
Littlefield	5,915	5,915	\$325,325	\$65,065
Olton	2,045	2,045	\$112,475	\$22,495
Springlake	96	96	\$5,280	\$1,056
Sudan	894	894	\$49,170	\$9,834
	10,565			
Lampasas County	21,428	10,778	\$592,790	\$118,558
Copperas Cove	669	669	\$36,795	\$7,359
Kempner	1,175	1,175	\$64,625	\$12,925
Lampasas	7,947	7,947	\$437,085	\$87,417
Lometa	859	859	\$47,245	\$9,449
	10,650			
Lavaca County	20,154	10,497	\$577,335	\$115,467
Hallettsville	2,693	2,693	\$148,115	\$29,623
Moulton	903	903	\$49,665	\$9,933
Shiner	2,218	2,218	\$121,990	\$24,398
Yoakum	3,843	3,843	\$211,365	\$42,273
	9,657			
Lee County	17,239	10,838	\$596,090	\$119,218
Giddings	5,195	5,195	\$285,725	\$57,145
Lexington	1,206	1,206	\$66,330	\$13,266
	6,401			
Leon County	17,404	11,734	\$645,370	\$129,074
Buffalo	1,896	1,896	\$104,280	\$20,856
Centerville	909	909	\$49,995	\$9,999
Jewett	1,243	1,243	\$68,365	\$13,673
Leona	189	189	\$10,395	\$2,079
Marquez	270	270	\$14,850	\$2,970
Normangee	683	683	\$37,565	\$7,513
Oakwood	480	480	\$26,400	\$5,280
	5,670			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Liberty County	88,219	55,297	\$3,041,335	\$608,267
Ames	1,168	1,168	\$64,240	\$12,848
Cleveland	8,620	8,620	\$474,100	\$94,820
Daisetta	1,109	1,109	\$60,995	\$12,199
Dayton	8,907	8,907	\$489,885	\$97,977
Dayton Lakes	108	108	\$5,940	\$1,188
Devers	531	531	\$29,205	\$5,841
Hardin	939	939	\$51,645	\$10,329
Kenefick	654	654	\$35,970	\$7,194
Liberty	9,754	9,754	\$536,470	\$107,294
North Cleveland	304	304	\$16,720	\$3,344
Old River-Winfree	127	127	\$6,985	\$1,397
Plum Grove	701	701	\$38,555	\$7,711
	32,922			
Limestone County	23,437	9,074	\$499,070	\$99,814
Coolidge	997	997	\$54,835	\$10,967
Groesbeck	4,372	4,372	\$240,460	\$48,092
Kosse	456	456	\$25,080	\$5,016
Mexia	7,709	7,709	\$423,995	\$84,799
Tehuacana	288	288	\$15,840	\$3,168
Thornton	541	541	\$29,755	\$5,951
	14,363			
Lipscomb County	3,233	490	\$26,950	\$5,390
Booker	1,528	1,528	\$84,040	\$16,808
Darrouzett	352	352	\$19,360	\$3,872
Follett	460	460	\$25,300	\$5,060
Higgins	403	403	\$22,165	\$4,433
	2,743			
Live Oak County	12,207	7,660	\$421,300	\$84,260
George West	2,572	2,572	\$141,460	\$28,292
Three Rivers	1,975	1,975	\$108,625	\$21,725
	4,547			
Llano County	21,795	14,344	\$788,920	\$157,784
Horseshoe Bay	3,142	3,142	\$172,810	\$34,562
Llano	3,507	3,507	\$192,885	\$38,577
Sunrise Beach Village	802	802	\$44,110	\$8,822
	7,451			
Loving County	169	169	\$9,295	\$1,859
	169			
Lubbock County	310,569	34,474	\$1,896,070	\$379,214

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Abernathy	754	754	\$41,470	\$8,294
Buffalo Springs	495	495	\$27,225	\$5,445
Idalou	2,246	2,246	\$123,530	\$24,706
Lubbock	256,600	256,600	\$14,113,000	\$2,822,600
New Deal	825	825	\$45,375	\$9,075
Ransom Canyon	1,103	1,103	\$60,665	\$12,133
Shallowater	2,501	2,501	\$137,555	\$27,511
Slaton	5,948	5,948	\$327,140	\$65,428
Wolfforth	5,623	5,623	\$309,265	\$61,853
	276,095			
Lynn County	5,951	1,712	\$94,160	\$18,832
New Home	366	366	\$20,130	\$4,026
O'Donnell	711	711	\$39,105	\$7,821
Tahoka	2,678	2,678	\$147,290	\$29,458
Wilson	484	484	\$26,620	\$5,324
	4,239			
Madison County	14,284	9,264	\$509,520	\$101,904
Madisonville	4,778	4,778	\$262,790	\$52,558
Midway	242	242	\$13,310	\$2,662
	5,020			
Marion County	9,854	7,817	\$429,935	\$85,987
Jefferson	2,037	2,037	\$112,035	\$22,407
	2,037			
Martin County	5,771	2,613	\$143,715	\$28,743
Ackerly	73	73	\$4,015	\$803
Stanton	3,085	3,085	\$169,675	\$33,935
	3,158			
Mason County	4,274	1,981	\$108,955	\$21,791
Mason	2,293	2,293	\$126,115	\$25,223
	2,293			
Matagorda County	36,643	14,652	\$805,860	\$161,172
Bay City	17,444	17,444	\$959,420	\$191,884
Palacios	4,547	4,547	\$250,085	\$50,017
	21,991			
Maverick County	58,722	29,942	\$1,646,810	\$329,362
Eagle Pass	28,780	28,780	\$1,582,900	\$316,580
	28,780			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
McCulloch County	7,984	2,192	\$120,560	\$24,112
Brady	5,618	5,618	\$308,990	\$61,798
Melvin	174	174	\$9,570	\$1,914
	5,792			
McLennan County	256,623	41,478	\$2,281,290	\$456,258
Bellmead	10,771	10,771	\$592,405	\$118,481
Beverly Hills	1,994	1,994	\$109,670	\$21,934
Bruceville-Eddy	1,691	1,691	\$93,005	\$18,601
Crawford	754	754	\$41,470	\$8,294
Gholson	1,118	1,118	\$61,490	\$12,298
Golinda	153	153	\$8,415	\$1,683
Hewitt	15,169	15,169	\$834,295	\$166,859
Lacy-Lakeview	7,010	7,010	\$385,550	\$77,110
Leroy	345	345	\$18,975	\$3,795
Lorena	1,776	1,776	\$97,680	\$19,536
Mart	2,041	2,041	\$112,255	\$22,451
McGregor	5,296	5,296	\$291,280	\$58,256
Riesel	1,051	1,051	\$57,805	\$11,561
Robinson	11,904	11,904	\$654,720	\$130,944
Ross	285	285	\$15,675	\$3,135
Valley Mills	13	13	\$715	\$143
Waco	139,324	139,324	\$7,662,820	\$1,532,564
West	2,871	2,871	\$157,905	\$31,581
Woodway	9,250	9,250	\$508,750	\$101,750
Bruceville-Eddy	1,865	1,865	\$102,575	\$20,515
Hallsburg	464	464	\$25,520	\$5,104
	215,145			
McMullen County	743	743	\$40,865	\$8,173
	743			
Medina County	51,584	30,552	\$1,680,360	\$336,072
Castroville	3,111	3,111	\$171,105	\$34,221
Devine	4,895	4,895	\$269,225	\$53,845
Hondo	9,522	9,522	\$523,710	\$104,742
LaCoste	1,287	1,287	\$70,785	\$14,157
Lytle	562	562	\$30,910	\$6,182
Natalia	1,627	1,627	\$89,485	\$17,897
San Antonio	28	28	\$1,540	\$308
	21,032			
Menard County	2,138	738	\$40,590	\$8,118
Menard	1,400	1,400	\$77,000	\$15,400
	1,400			
Midland County	176,832	30,107	\$1,655,885	\$331,177
Midland	144,600	144,600	\$7,953,000	\$1,590,600
Odessa	2,125	2,125	\$116,875	\$23,375

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	146,725			
Milam County	24,823	11,093	\$610,115	\$122,023
Buckholts	544	544	\$29,920	\$5,984
Cameron	5,629	5,629	\$309,595	\$61,919
Milano	456	456	\$25,080	\$5,016
Rockdale	5,685	5,685	\$312,675	\$62,535
Thorndale	1,416	1,416	\$77,880	\$15,576
	13,730			
Mills County	4,873	2,790	\$153,450	\$30,690
Goldthwaite	1,903	1,903	\$104,665	\$20,933
Mullin	180	180	\$9,900	\$1,980
	2,083			
Mitchell County	8,545	4,013	\$220,715	\$44,143
Colorado City	3,724	3,724	\$204,820	\$40,964
Loraine	570	570	\$31,350	\$6,270
Westbrook	238	238	\$13,090	\$2,618
	4,532			
Montague County	19,818	10,557	\$580,635	\$116,127
Bowie	5,137	5,137	\$282,535	\$56,507
Nocona	3,036	3,036	\$166,980	\$33,396
St. Jo	1,088	1,088	\$59,840	\$11,968
	9,261			
Moore County	20,940	2,206	\$121,330	\$24,266
Cactus	3,143	3,143	\$172,865	\$34,573
Dumas	13,770	13,770	\$757,350	\$151,470
Fritch	8	8	\$440	\$88
Sunray	1,813	1,813	\$99,715	\$19,943
	18,734			
Morris County	12,388	6,230	\$342,650	\$68,530
Daingerfield	2,364	2,364	\$130,020	\$26,004
Hughes Springs	6	6	\$330	\$66
Lone Star	1,467	1,467	\$80,685	\$16,137
Naples	1,339	1,339	\$73,645	\$14,729
Omaha	982	982	\$54,010	\$10,802
	6,158			
Motley County	1,200	348	\$19,140	\$3,828
Matador	615	615	\$33,825	\$6,765
Roaring Springs	237	237	\$13,035	\$2,607
	852			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Nacogdoches County	65,204	29,127	\$1,601,985	\$320,397
Appleby	495	495	\$27,225	\$5,445
Chireno	387	387	\$21,285	\$4,257
Cushing	611	611	\$33,605	\$6,721
Garrison	908	908	\$49,940	\$9,988
Nacogdoches	33,676	33,676	\$1,852,180	\$370,436
	36,077			
Navarro County	50,113	17,186	\$945,230	\$189,046
Angus	458	458	\$25,190	\$5,038
Barry	262	262	\$14,410	\$2,882
Blooming Grove	853	853	\$46,915	\$9,383
Corsicana	24,764	24,764	\$1,362,020	\$272,404
Dawson	813	813	\$44,715	\$8,943
Emhouse	142	142	\$7,810	\$1,562
Eureka	325	325	\$17,875	\$3,575
Frost	651	651	\$35,805	\$7,161
Goodlow	198	198	\$10,890	\$2,178
Kerens	1,584	1,584	\$87,120	\$17,424
Mildred	390	390	\$21,450	\$4,290
Mustang	23	23	\$1,265	\$253
Navarro	211	211	\$11,605	\$2,321
Oak Valley	401	401	\$22,055	\$4,411
Powell	148	148	\$8,140	\$1,628
Retreat	410	410	\$22,550	\$4,510
Rice	1,024	1,024	\$56,320	\$11,264
Richland	270	270	\$14,850	\$2,970
	32,927			
Newton County	13,595	11,243	\$618,365	\$123,673
Newton	2,352	2,352	\$129,360	\$25,872
	2,352			
Nolan County	14,714	2,712	\$149,160	\$29,832
Blackwell	295	295	\$16,225	\$3,245
Roscoe	1,273	1,273	\$70,015	\$14,003
Sweetwater	10,434	10,434	\$573,870	\$114,774
	12,002			
Nueces County	362,294	15,103	\$830,665	\$166,133
Agua Dulce	833	833	\$45,815	\$9,163
Aransas Pass	14	14	\$770	\$154
Bishop	3,134	3,134	\$172,370	\$34,474
Corpus Christi	326,554	326,554	\$17,960,470	\$3,592,094
Driscoll	749	749	\$41,195	\$8,239
Petronila	112	112	\$6,160	\$1,232
Port Aransas	4,159	4,159	\$228,745	\$45,749
Robstown	11,207	11,207	\$616,385	\$123,277
San Patricio	429	429	\$23,595	\$4,719

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	347,191			
Ochiltree County	9,836	1,159	\$63,745	\$12,749
Perryton	8,677	8,677	\$477,235	\$95,447
	8,677			
Oldham Country	2,112	1,050	\$57,750	\$11,550
Adrian	157	157	\$8,635	\$1,727
Vega	905	905	\$49,775	\$9,955
	1,062			
Orange County	83,396	41,300	\$2,271,500	\$454,300
Bridge City	7,900	7,900	\$434,500	\$86,900
Orange	18,847	18,847	\$1,036,585	\$207,317
Pine Forest	505	505	\$27,775	\$5,555
Rose City	511	511	\$28,105	\$5,621
Vidor	10,955	10,955	\$602,525	\$120,505
West Orange	3,378	3,378	\$185,790	\$37,158
	42,096			
Palo Pinto County	29,189	9,865	\$542,575	\$108,515
Gordon	484	484	\$26,620	\$5,324
Graford	630	630	\$34,650	\$6,930
Mineral Wells	17,295	17,295	\$951,225	\$190,245
Mingus	249	249	\$13,695	\$2,739
Strawn	666	666	\$36,630	\$7,326
	19,324			
Panola County	23,194	14,938	\$821,590	\$164,318
Beckville	933	933	\$51,315	\$10,263
Carthage	7,004	7,004	\$385,220	\$77,044
Gary City	319	319	\$17,545	\$3,509
	8,256			
Parker County	142,878	85,693	\$4,713,115	\$942,623
Aledo	4,105	4,105	\$225,775	\$45,155
Annetta	3,067	3,067	\$168,685	\$33,737
Annetta North	565	565	\$31,075	\$6,215
Annetta South	590	590	\$32,450	\$6,490
Azle	2,205	2,205	\$121,275	\$24,255
Cool	185	185	\$10,175	\$2,035
Cresson	574	574	\$31,570	\$6,314
Fort Worth	8	8	\$440	\$88
Hudson Oaks	2,291	2,291	\$126,005	\$25,201
Millsap	446	446	\$24,530	\$4,906
Reno	3,027	3,027	\$166,485	\$33,297
Sanctuary	333	333	\$18,315	\$3,663
Springtown	3,086	3,086	\$169,730	\$33,946

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Weatherford	31,188	31,188	\$1,715,340	\$343,068
Willow Park	5,515	5,515	\$303,325	\$60,665
	57,185			
Parmer County	9,605	2,538	\$139,590	\$27,918
Bovina	1,807	1,807	\$99,385	\$19,877
Farwell	1,326	1,326	\$72,930	\$14,586
Friona	3,934	3,934	\$216,370	\$43,274
	7,067			
Pecos County	15,823	6,373	\$350,515	\$70,103
Fort Stockton	8,284	8,284	\$455,620	\$91,124
Iraan	1,166	1,166	\$64,130	\$12,826
	9,450			
Polk County	51,353	41,394	\$2,276,670	\$455,334
Corrigan	1,691	1,691	\$93,005	\$18,601
Goodrich	312	312	\$17,160	\$3,432
Livingston	5,302	5,302	\$291,610	\$58,322
Onalaska	2,536	2,536	\$139,480	\$27,896
Seven Oaks	118	118	\$6,490	\$1,298
	9,959			
Potter County	117,415	13,017	\$715,935	\$143,187
Amarillo	104,222	104,222	\$5,732,210	\$1,146,442
Bishop Hills	176	176	\$9,680	\$1,936
	104,398			
Presidio County	6,704	1,077	\$59,235	\$11,847
Marfa	1,666	1,666	\$91,630	\$18,326
Presidio	3,961	3,961	\$217,855	\$43,571
	5,627			
Rains County	12,514	9,135	\$502,425	\$100,485
East Tawakoni	992	992	\$54,560	\$10,912
Emory	1,444	1,444	\$79,420	\$15,884
Point	943	943	\$51,865	\$10,373
	3,379			
Randall County	137,714	22,885	\$1,258,675	\$251,735
Amarillo	95,702	95,702	\$5,263,610	\$1,052,722
Canyon	16,733	16,733	\$920,315	\$184,063
Happy	669	669	\$36,795	\$7,359
Lake Tanglewood	885	885	\$48,675	\$9,735
Palisades	348	348	\$19,140	\$3,828
Timbercreek Canyon	492	492	\$27,060	\$5,412

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
	114,829			
Reagan County	3,849	258	\$14,190	\$2,838
Big Lake	3,591	3,591	\$197,505	\$39,501
	3,591			
Real County	3,452	2,185	\$120,175	\$24,035
Camp Wood	763	763	\$41,965	\$8,393
Leakey	504	504	\$27,720	\$5,544
	1,267			
Red River County	12,023	6,353	\$349,415	\$69,883
Annona	290	290	\$15,950	\$3,190
Avery	444	444	\$24,420	\$4,884
Bogata	1,080	1,080	\$59,400	\$11,880
Clarksville	3,159	3,159	\$173,745	\$34,749
Detroit	697	697	\$38,335	\$7,667
	5,670			
Reeves County	15,976	4,980	\$273,900	\$54,780
Balmorea	566	566	\$31,130	\$6,226
Pecos	10,331	10,331	\$568,205	\$113,641
Toyah	99	99	\$5,445	\$1,089
	10,996			
Refugio County	6,948	2,398	\$131,890	\$26,378
Austwell	145	145	\$7,975	\$1,595
Bayside	295	295	\$16,225	\$3,245
Refugio	2,691	2,691	\$148,005	\$29,601
Woodsboro	1,419	1,419	\$78,045	\$15,609
	4,550			
Roberts County	854	303	\$16,665	\$3,333
Miami	551	551	\$30,305	\$6,061
	551			
Robertson County	17,074	8,452	\$464,860	\$92,972
Bremond	991	991	\$54,505	\$10,901
Calvert	1,142	1,142	\$62,810	\$12,562
Franklin	1,698	1,698	\$93,390	\$18,678
Hearne	4,791	4,791	\$263,505	\$52,701
	8,622			
Rockwall County	104,915	14,332	\$788,260	\$157,652
Fate	14,427	14,427	\$793,485	\$158,697
Heath	8,417	8,417	\$462,935	\$92,587

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
McLendon-Chisholm	3,113	3,113	\$171,215	\$34,243
Mobile City	208	208	\$11,440	\$2,288
Rockwall	44,121	44,121	\$2,426,655	\$485,331
Rowlett	7,983	7,983	\$439,065	\$87,813
Royse City	10,842	10,842	\$596,310	\$119,262
Wylie	1,472	1,472	\$80,960	\$16,192
	90,583			
Runnels County	10,264	3,618	\$198,990	\$39,798
Ballinger	3,421	3,421	\$188,155	\$37,631
Miles	835	835	\$45,925	\$9,185
Winters	2,390	2,390	\$131,450	\$26,290
	6,646			
Rusk County	54,406	31,756	\$1,746,580	\$349,316
Easton	53	53	\$2,915	\$583
Henderson	13,517	13,517	\$743,435	\$148,687
Kilgore	3,530	3,530	\$194,150	\$38,830
Mount Enterprise	439	439	\$24,145	\$4,829
New London	996	996	\$54,780	\$10,956
Overton	2,500	2,500	\$137,500	\$27,500
Reklaw	160	160	\$8,800	\$1,760
Tatum	1,455	1,455	\$80,025	\$16,005
	22,650			
Sabine County	10,542	8,463	\$465,465	\$93,093
Hemphill	1,256	1,256	\$69,080	\$13,816
Pineland	823	823	\$45,265	\$9,053
	2,079			
San Augustine County	8,237	6,121	\$336,655	\$67,331
Broaddus	205	205	\$11,275	\$2,255
San Augustine	1,911	1,911	\$105,105	\$21,021
	2,116			
San Jacinto County	28,859	24,535	\$1,349,425	\$269,885
Coldspring	975	975	\$53,625	\$10,725
Point Blank	749	749	\$41,195	\$8,239
Shepherd	2,600	2,600	\$143,000	\$28,600
	4,324			
San Patricio County	66,730	8,882	\$488,510	\$97,702
Aransas Pass	7,376	7,376	\$405,680	\$81,136
Gregory	1,920	1,920	\$105,600	\$21,120
Ingleside	9,754	9,754	\$536,470	\$107,294
Ingleside on the Bay	584	584	\$32,120	\$6,424
Lake City	514	514	\$28,270	\$5,654
Lakeside	309	309	\$16,995	\$3,399

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Mathis	4,745	4,745	\$260,975	\$52,195
Odem	2,390	2,390	\$131,450	\$26,290
Portland	22,151	22,151	\$1,218,305	\$243,661
Sinton	5,133	5,133	\$282,315	\$56,463
Taft	2,972	2,972	\$163,460	\$32,692
	57,848			
San Saba County	6,055	2,388	\$131,340	\$26,268
Richland Springs	350	350	\$19,250	\$3,850
San Saba	3,317	3,317	\$182,435	\$36,487
	3,667			
Schleicher County	2,793	1,076	\$59,180	\$11,836
Eldorado	1,717	1,717	\$94,435	\$18,887
	1,717			
Scurry County	16,703	5,323	\$292,765	\$58,553
Snyder	11,380	11,380	\$625,900	\$125,180
	11,380			
Shackelford County	3,265	1,032	\$56,760	\$11,352
Albany	1,973	1,973	\$108,515	\$21,703
Moran	260	260	\$14,300	\$2,860
	2,233			
Shelby County	25,274	16,467	\$905,685	\$181,137
Center	5,345	5,345	\$293,975	\$58,795
Huxley	376	376	\$20,680	\$4,136
Joaquin	790	790	\$43,450	\$8,690
Tenaha	1,163	1,163	\$63,965	\$12,793
Timpson	1,133	1,133	\$62,315	\$12,463
	8,807			
Sherman County	3,022	563	\$30,965	\$6,193
Stratford	2,119	2,119	\$116,545	\$23,309
Texhoma	340	340	\$18,700	\$3,740
	2,459			
Smith County	232,751	98,070	\$5,393,850	\$1,078,770
Arp	1,029	1,029	\$56,595	\$11,319
Bullard	3,492	3,492	\$192,060	\$38,412
Hideaway	3,172	3,172	\$174,460	\$34,892
Lindale	6,434	6,434	\$353,870	\$70,774
New Chapel Hill	630	630	\$34,650	\$6,930
Noonday	805	805	\$44,275	\$8,855
Troup	1,975	1,975	\$108,625	\$21,725
Tyler	107,549	107,549	\$5,915,195	\$1,183,039

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Whitehouse	9,002	9,002	\$495,110	\$99,022
Winona	593	593	\$32,615	\$6,523
	134,681			
Somervell County	9,128	6,311	\$347,105	\$69,421
Glen Rose	2,817	2,817	\$154,935	\$30,987
	2,817			
Starr County	64,633	33,399	\$1,836,945	\$367,389
Escobares	2,854	2,854	\$156,970	\$31,394
La Grulla	1,676	1,676	\$92,180	\$18,436
Loma Vista CDP	171	171	\$9,405	\$1,881
Rio Grande City	15,049	15,049	\$827,695	\$165,539
Roma	11,484	11,484	\$631,620	\$126,324
	31,234			
Stephens County	9,366	3,559	\$195,745	\$39,149
Breckenridge	5,807	5,807	\$319,385	\$63,877
	5,807			
Sterling County	1,291	286	\$15,730	\$3,146
Sterling City	1,005	1,005	\$55,275	\$11,055
	1,005			
Stonewall County	1,350	483	\$26,565	\$5,313
Aspermont	867	867	\$47,685	\$9,537
	867			
Sutton County	3,776	727	\$39,985	\$7,997
Sonora	3,049	3,049	\$167,695	\$33,539
	3,049			
Swisher County	7,397	2,022	\$111,210	\$22,242
Kress	687	687	\$37,785	\$7,557
Tulia	4,688	4,688	\$257,840	\$51,568
	5,375			
Taylor County	138,034	14,765	\$812,075	\$162,415
Buffalo Gap	498	498	\$27,390	\$5,478
Impact	33	33	\$1,815	\$363
Lawn	314	314	\$17,270	\$3,454
Merkel	2,656	2,656	\$146,080	\$29,216
Trent	340	340	\$18,700	\$3,740
Tuscola	752	752	\$41,360	\$8,272
Tye	1,314	1,314	\$72,270	\$14,454

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Abilene	117,362	117,362	\$6,454,910	\$1,290,982
	123,269			
Terrell County	776	776	\$42,680	\$8,536
	776			
Terry County	12,337	2,076	\$114,180	\$22,836
Brownfield	9,484	9,484	\$521,620	\$104,324
Meadow	578	578	\$31,790	\$6,358
Wellman	199	199	\$10,945	\$2,189
	10,261			
Throckmorton County	1,501	487	\$26,785	\$5,357
Throckmorton	764	764	\$42,020	\$8,404
Woodson	250	250	\$13,750	\$2,750
	1,014			
Titus	32,750	14,297	\$786,335	\$157,267
Miller's Cove	156	156	\$8,580	\$1,716
Mount Pleasant	17,237	17,237	\$948,035	\$189,607
Talco	518	518	\$28,490	\$5,698
Winfield	542	542	\$29,810	\$5,962
	18,453			
Tom Green	119,200	19,406	\$1,067,330	\$213,466
San Angelo	99,794	99,794	\$5,488,670	\$1,097,734
	99,794			
Trinity County	14,651	10,802	\$594,110	\$118,822
Groveton	1,084	1,084	\$59,620	\$11,924
Trinity	2,765	2,765	\$152,075	\$30,415
	3,849			
Tyler County	21,672	15,982	\$879,010	\$175,802
Chester	324	324	\$17,820	\$3,564
Colmesneil	611	611	\$33,605	\$6,721
Ivanhoe	2,009	2,009	\$110,495	\$22,099
Woodville	2,746	2,746	\$151,030	\$30,206
	5,690			
Upshur County	41,753	30,430	\$1,673,650	\$334,730
Big Sandy	1,384	1,384	\$76,120	\$15,224
East Mountain	837	837	\$46,035	\$9,207
Gilmer	5,032	5,032	\$276,760	\$55,352
Gladewater	2,470	2,470	\$135,850	\$27,170

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Ore City	1,219	1,219	\$67,045	\$13,409
Union Grove	373	373	\$20,515	\$4,103
Warren	8	8	\$440	\$88
	11,323			
Upton County	3,657	698	\$38,390	\$7,678
McCamey	2,103	2,103	\$115,665	\$23,133
Rankin	856	856	\$47,080	\$9,416
	2,959			
Uvalde County	26,741	8,622	\$474,210	\$94,842
Sabinal	1,751	1,751	\$96,305	\$19,261
Uvalde	16,368	16,368	\$900,240	\$180,048
	18,119			
Val Verde County	49,025	13,173	\$724,515	\$144,903
Del Rio	35,852	35,852	\$1,971,860	\$394,372
	35,852			
Van Zandt County	56,950	40,537	\$2,229,535	\$445,907
Canton	4,015	4,015	\$220,825	\$44,165
Edgewood	1,556	1,556	\$85,580	\$17,116
Edom	410	410	\$22,550	\$4,510
Fruitvale	434	434	\$23,870	\$4,774
Grand Saline	3,284	3,284	\$180,620	\$36,124
Van	2,900	2,900	\$159,500	\$31,900
Wills Point	3,814	3,814	\$209,770	\$41,954
	16,413			
Victoria County	92,084	24,758	\$1,361,690	\$272,338
Victoria	67,326	67,326	\$3,702,930	\$740,586
	67,326			
Walker County	72,971	29,868	\$1,642,740	\$328,548
Huntsville	41,453	41,453	\$2,279,915	\$455,983
New Waverly	1,091	1,091	\$60,005	\$12,001
Riverside	559	559	\$30,745	\$6,149
	43,103			
Waller County	55,246	29,261	\$1,609,355	\$321,871
Brookshire	5,685	5,685	\$312,675	\$62,535
Hempstead	7,309	7,309	\$401,995	\$80,399
Katy	1,806	1,806	\$99,330	\$19,866
Pattison	601	601	\$33,055	\$6,611
Pine Island	1,190	1,190	\$65,450	\$13,090
Prairie View	6,560	6,560	\$360,800	\$72,160
Waller	2,834	2,834	\$155,870	\$31,174
	25,985			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Ward County	11,998	2,418	\$132,990	\$26,598
Barstow	377	377	\$20,735	\$4,147
Grandfalls	381	381	\$20,955	\$4,191
Monahans	7,638	7,638	\$420,090	\$84,018
Pyote	131	131	\$7,205	\$1,441
Thorntonville	515	515	\$28,325	\$5,665
Wickett	538	538	\$29,590	\$5,918
	9,580			
Washington County	35,882	17,829	\$980,595	\$196,119
Brenham	17,752	17,752	\$976,360	\$195,272
Burton	301	301	\$16,555	\$3,311
	18,053			
Webb County	276,652	643	\$35,365	\$7,073
El Cenizo	3,119	3,119	\$171,545	\$34,309
Laredo	268,057	268,057	\$14,743,135	\$2,948,627
Rio Bravo	4,833	4,833	\$265,815	\$53,163
	276,009			
Wharton County	41,556	18,773	\$1,032,515	\$206,503
East Bernard	2,367	2,367	\$130,185	\$26,037
El Campo	11,782	11,782	\$648,010	\$129,602
Wharton	8,634	8,634	\$474,870	\$94,974
	22,783			
Wheeler County	5,056	1,679	\$92,345	\$18,469
Mobeetie	96	96	\$5,280	\$1,056
Shamrock	1,797	1,797	\$98,835	\$19,767
Wheeler	1,484	1,484	\$81,620	\$16,324
	3,377			
Wichita County	132,230	4,856	\$267,080	\$53,416
Burkburnett	11,223	11,223	\$617,265	\$123,453
Cashion Community	347	347	\$19,085	\$3,817
Electra	2,740	2,740	\$150,700	\$30,140
Iowa Park	6,364	6,364	\$350,020	\$70,004
Pleasant Valley	338	338	\$18,590	\$3,718
Wichita Falls	106,362	106,362	\$5,849,910	\$1,169,982
	127,374			
Wilbarger County	12,769	2,581	\$141,955	\$28,391
Vernon	10,188	10,188	\$560,340	\$112,068
	10,188			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Willacy County	21,358	7,073	\$389,015	\$77,803
Lyford	2,576	2,576	\$141,680	\$28,336
Raymondville	11,144	11,144	\$612,920	\$122,584
San Perlita	565	565	\$31,075	\$6,215
	14,285			
Wilson County	51,070	37,729	\$2,075,095	\$415,019
Floresville	7,927	7,927	\$435,985	\$87,197
La Vernia	1,387	1,387	\$76,285	\$15,257
Nixon	8	8	\$440	\$88
Poth	2,332	2,332	\$128,260	\$25,652
Stockdale	1,687	1,687	\$92,785	\$18,557
	13,341			
Winkler County	8,010	799	\$43,945	\$8,789
Kermit	6,178	6,178	\$339,790	\$67,958
Wink	1,033	1,033	\$56,815	\$11,363
	7,211			
Wise County	69,984	42,809	\$2,354,495	\$470,899
Alvord	1,605	1,605	\$88,275	\$17,655
Aurora	1,576	1,576	\$86,680	\$17,336
Boyd	1,467	1,467	\$80,685	\$16,137
Bridgeport	7,092	7,092	\$390,060	\$78,012
Chico	1,170	1,170	\$64,350	\$12,870
Decatur	7,013	7,013	\$385,715	\$77,143
Lake Bridgeport	398	398	\$21,890	\$4,378
New Fairview	1,581	1,581	\$86,955	\$17,391
Newark	1,228	1,228	\$67,540	\$13,508
Paradise	572	572	\$31,460	\$6,292
Rhome	1,933	1,933	\$106,315	\$21,263
Runaway Bay	1,540	1,540	\$84,700	\$16,940
	27,175			
Wood County	45,539	33,863	\$1,862,465	\$372,493
Alba	554	554	\$30,470	\$6,094
Hawkins	1,392	1,392	\$76,560	\$15,312
Mineola	4,843	4,843	\$266,365	\$53,273
Quitman	1,888	1,888	\$103,840	\$20,768
Winnsboro	2,588	2,588	\$142,340	\$28,468
Yantis	411	411	\$22,605	\$4,521
	11,676			
Yoakum County	8,713	2,166	\$119,130	\$23,826
Denver City	4,878	4,878	\$268,290	\$53,658
Plains	1,669	1,669	\$91,795	\$18,359
	6,547			

Place	Jan 2019 Population Est.	Relative Population	\$55 Per Capita	20% of Allocation
Young County	18,010	5,363	\$294,965	\$58,993
Graham	8,950	8,950	\$492,250	\$98,450
Newcastle	559	559	\$30,745	\$6,149
Olney	3,138	3,138	\$172,590	\$34,518
	12,647			
Zavala County	11,840	4,570	\$251,350	\$50,270
Crystal City	7,270	7,270	\$399,850	\$79,970
	7,270			
Zapata County	14,179	14,179	\$779,845	\$155,969
			\$584,532,630	\$116,906,526
<p>Data Source for county data is taken from the U.S. Census Vintage 2019 population estimates as used by the U.S. Treasury. This data can be found at the following link: https://www.census.gov/data/tables/time-series/demo/popest/2010s-</p>				
<p>Data Source for other jurisdiction population numbers are taken from the Texas Demographic Center's 2019 population estimates. This data can be found at the following link: https://demographics.texas.gov/Data/TPEPP/Estimates/</p>				



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

October 3, 2018

Diane Rath
Executive Director
Alamo Area Council of Governments
8700 Tesoro Dr, Ste 160
San Antonio, TX 78217

**Re: Alamo Area Council of Governments Method of Distribution (MOD) — 2017
Hurricane Harvey CDBG-DR Funds**

Dear Ms Rath:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has completed its review of materials submitted in support of Alamo Area Council of Governments' (AACOG) proposed MOD for the Community Development Block Grant Disaster Recovery (CDBG-DR) funds reserved for communities affected by Hurricane Harvey. We are happy to inform you that AACOG's MOD submitted on July 15, 2018, with supplemental material submitted on August 6, 2018, is approved.

GLO-CDR approves AACOG's proposed allocation of Local Buyout and Acquisition Program and Local Infrastructure Program funds to the identified entities. The terms of the approval are noted below:

1. As part of the application process, subrecipients are required to hold a public hearing and conduct outreach to local governments; housing advocacy organizations; faith-based organizations; community groups representing protected classes and vulnerable populations; groups interested in fair housing issues; and limited English proficient (LEP) persons.
2. Acceptance of the MOD does not indicate eligibility or approval of funding for any proposed projects.
3. AACOG's allocation must meet the requirement that 70 percent of funds benefit low- to moderate-income persons. Projects that do not meet HUD's national objective for benefitting low- to moderate-income persons may not be approved until this allocation requirement is met.

AACOG MOD Approval Letter

October 3, 2018

Page 2

4. Acceptance of the MOD does not indicate approval of any proposed re-allocation recommendations.

If you have any questions, please feel free to contact me at (512) 475-5027, or Alexandra Gamble, Manager, Policy Development, at alexandra.gamble.glo@recovery.texas.gov or (512) 475-5021.

Sincerely,



Heather Lagrone, Deputy Director
Community Development and Revitalization
Texas General Land Office

cc: Stella Garcia, Senior Director of Operations, AACOG
Alexandra Gamble, Manager, Policy Development, GLO-CDR
Shawn Strange, Program Manager, Policy Development, GLO-CDR
Zachary Stern, Planner, Policy Development, GLO-CDR
Christopher Smith, Planner, Policy Development, GLO-CDR

MOD Summary Form



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

Principal Contact Name, Title: Stella E. Garcia, Sr. Director of Operations

Principal Contact Telephone: 210-362-5252

Principal Contact Email: Sgarcia1@aacog.com

Principal Contact Address: 8700 Tesoro Drive, Suite 160

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"/>	SA Express News	July 4, 2018	Pending affidavit
<input checked="" type="checkbox"/>	Seguin Gazette	June 27, 2018 July 4, 2018	Pending affidavit
	New Braunsfels Herald-Zeitung	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
<u>Damage Reports</u>	<u>50</u>	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 indicates 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.

Diane Rath

9/26/18

Signature

Date

Diane D. Rath
Printed Name

Executive Director
Title

drath@aacog.com
Email Address

210-362-5201
Telephone Number

Resolution

A RESOLUTION TO APPROVE THE METHOD OF DISTRIBUTION FOR THE ALLOCATION OF HURRICANE HARVEY DISASTER RECOVERY FUNDING

WHEREAS, the Alamo Area Council of Governments (AACOG) which was established in 1967 under Chapter 391 of the Local Government Code as a voluntary association of local governments and organizations that serves its members through planning, information, and coordination activities and serves the Alamo Area/State Planning Region 18, which covers 13 counties and 12,582 square miles comprising of Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, McMullen, and Wilson counties; and

WHEREAS, on February 9, 2018 the US Department of Housing and Urban Development (HUD) announced the allocation of \$5.024 billion dollars in disaster recovery assistance to the State of Texas; and

WHEREAS, the Texas General Land Office (GLO) developed an Action Plan approved by HUD on June 25, 2018, which allocated funds to local governments for the local residential buyout/acquisition and local infrastructure programs through Methods of Distributions (MODs) developed by the COGs, of which, \$4,152,165 was allocated for the local buyout/acquisition program and \$1,530,000 was allocated for the infrastructure program to Comal, Guadalupe, and Karnes Counties in the AACOG region; and

WHEREAS, on June 18th and July 6th 2018, the AACOG conducted two public meetings and established the Method of Distribution of disaster recovery assistance to eligible local governments within the AACOG region.

NOW THEREFORE, BE IT RESOLVED by the Alamo Area Council of Governments:

1. That the Alamo Area Council of Government accepts and approves the Method of Distribution (MOD) for Hurricane Harvey – Round 1.
2. That the Alamo Area Council of Government reviewed and accepts into the MOD, the comments made during the public meetings and public comment period.
3. That this Resolution shall become effective immediately upon adoption.

Passed and approved this 26th day of September, 2018.



Chris Schuchart, Chairman
AACOG Board of Directors and
Judge, Medina County



Diane D. Rath, Executive Director
AACOG

Allocation Summary Spreadsheet

Hurricane Harvey Regional Method of Distribution Allocation Summary

COG: Alamo Area Council of Governments

Required	Local Buyout and Acquisition Program		Local Infrastructure Program		Total	\$ 5,682,165	
	Required	Required	Required	Required	Required	Required	Required
City, County or Eligible Entity	Allocation	Percentage of Allocation	Allocation	Percentage of Allocation	Total Allocation	Percentage of Total Regional Allocation	70% Low-to-Moderate Income Benefit Requirement
Comal County	\$1,015,805	24.46%	\$ 174,748.00	11.42%	\$1,190,553	20.95%	\$833,387
New Braunfels	\$0	0.00%	\$ 372,103.00	24.32%	\$372,103	6.55%	\$260,472
Bulverde/Spring Branch	\$0	0.00%	\$ 61,528.00	4.02%	\$61,528	1.08%	\$43,070
Guadalupe County	\$1,410,753	33.98%	\$ 226,180.00	14.78%	\$1,636,933	28.81%	\$1,145,853
Seguin	\$0	0.00%	\$ 226,348.00	14.79%	\$226,348	3.98%	\$158,444
Schertz	\$0	0.00%	\$ 103,801.00	6.78%	\$103,801	1.83%	\$72,661
Marion	\$0	0.00%	\$ 56,593.00	3.70%	\$56,593	1.00%	\$39,615
McQueeney	\$0	0.00%	\$ 58,332.00	3.81%	\$58,332	1.03%	\$40,832
Lake Dunlap	\$0	0.00%	\$ 91,592.00	5.99%	\$91,592	1.61%	\$64,114
Karnes County	\$1,725,606	41.56%	\$ 74,177.00	4.85%	\$1,799,783	31.67%	\$1,259,848
Karnes City	\$0	0.00%	\$ 33,745.00	2.21%	\$33,745	0.59%	\$23,622
Kenedy	\$0	0.00%	\$ 50,853.00	3.32%	\$50,853	0.89%	\$35,597
	\$4,152,164	100.00%	\$1,530,000	100.00%	\$5,682,164	100.00%	\$3,977,515
	Percentage of Total Allocation:	73.07%	26.93%		Low-to-Moderate Income Benefit Requirement	70%	\$3,977,516

Final Allocations are based on minimum rule of \$100,000 for Infrastructure grants; therefore the communities highlighted above with less than \$100,000 will be rolled into the county's allocation.

Bulverde/Spring Branch	61,528
Comal County	174,748
Revised Comal County Allocation	236,276
Marion	56,593
McQueeney	58,332
Lake Dunlap	91,592
Guadalupe County	226,180
Revised Guadalupe County Allocation	432,697
Karnes City	33,745
Kenedy	50,853
Karnes County	74,177
Revised Karnes County Allocation	158,775

Buyout Acquisition Allocation

Alamo Area Council of Governments

City, County or Eligible Entity	First Distribution Factor: Damage Reports			Second Distribution Factor: Population			Third Distribution Factor: Repeat Disaster since 2005			Proportional Weighted Factor (PWF)	Housing - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
	SUM of Factors: 560			SUM of Factors: 315,855			SUM of Factors: 7					
	Factor Weight: 50%			Factor Weight: 25%			Factor Weight: 25%					
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)			
Comal County	29	50%	0.03	141,009	25%	0.11	3	25%	0.11	24%	\$ 4,152,165	\$1,015,805
Guadalupe County	119	50%	0.11	159,659	25%	0.13	3	25%	0.11	34%	\$ 4,152,165	\$1,410,753
Karnes County	412	50%	0.37	15,187	25%	0.01	1	25%	0.04	42%	\$ 4,152,165	\$1,725,606
SUM	560			315,855			7					
										100%		\$4,152,165

Local Infrastructure Allocation Alamo Area Council of Governments

City or County	First Distribution Factor: Damage Reports			Second Distribution Factor: Population			Third Distribution Factor: Repeat Disasters			Proportional Weighted Factor (PWF)	Infrastructure - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
	SUM of Factors:	45		SUM of Factors:	315,855		SUM of Factors:	30				
	Factor Weight:	50%		Factor Weight:	25%		Factor Weight:	25%				
	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)	Factor Measure (FM)	Weight (W)	Proportion of Weight W(FM/SUM)			
Comal County	4	50%	0.04	56,563	25%	0.04	3	25%	0.03	11%	\$ 1,530,000	\$174,748
New Braunfels	14	50%	0.16	79,152	25%	0.06	3	25%	0.03	24%	\$ 1,530,000	\$372,103
Bulverde/Spring Branch	1	50%	0.01	5,184	25%	0.00	3	25%	0.03	4%	\$ 1,530,000	\$61,528
Guadalupe County*	5	50%	0.06	84,996	25%	0.07	3	25%	0.03	15%	\$ 1,530,000	\$226,180
Seguin	9	50%	0.10	28,983	25%	0.02	3	25%	0.03	15%	\$ 1,530,000	\$226,348
Schertz	1	50%	0.01	40,092	25%	0.03	3	25%	0.03	7%	\$ 1,530,000	\$103,801
Marion	1	50%	0.01	1,109	25%	0.00	3	25%	0.03	4%	\$ 1,530,000	\$56,593
McQueeney	1	50%	0.01	2,545	25%	0.00	3	25%	0.03	4%	\$ 1,530,000	\$58,332
Lake Dunlap	3	50%	0.03	1,934	25%	0.00	3	25%	0.03	6%	\$ 1,530,000	\$91,592
Karnes County	3	50%	0.03	8,610	25%	0.01	1	25%	0.01	5%	\$ 1,530,000	\$74,177
Karnes City	1	50%	0.01	3,299	25%	0.00	1	25%	0.01	2%	\$ 1,530,000	\$33,745
Kenedy	2	50%	0.02	3,388	25%	0.00	1	25%	0.01	3%	\$ 1,530,000	\$50,853
SUM	45			315,855			30					
										100%		\$1,530,000

Citizen Participation Plan



Citizen Participation Plan
COG Method of Distribution
Hurricane Harvey CDBG-Disaster Recovery Allocation

Summary Information

Contact Information

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

Principle Contact Name, Title: **Stella E. Garcia, Sr. Director of Operations**

Principle Contact Telephone: **210-362-5252**

Principle Contact Email: Sgarcia1@aacog.com

Principle Contact Address: **8700 Tesoro Drive, Suite 100**

City, State, Zip: **San Antonio, Texas 78217**

Citizen and Non-Governmental Organization Outreach

The COG will encourage citizens, with particular emphasis on persons of low-to-moderate income and other vulnerable populations to submit their views regarding community development and housing needs resulting from the disaster(s) in the following ways:

Citizens will be encouraged, through the AACOG website (www.aacog.com), public notices, flyers, and the Method of Distribution (MOD) prepared for public review to submit their views and comments regarding housing and community development (infrastructure) needs resulting from Hurricane Harvey. Citizens will be instructed to submit their comments in writing to AACOG via written letter, email to disaster_recovery@aacog.com, or in person by attending a scheduled public hearing.

The following local organizations that provide services or housing for low-to-moderate income persons, including but not limited to, the local Public Housing Authorities, the local Health and Human Services offices, the local mental health and MHMR offices, Community Development Corporations and Community Housing Development Organizations, will receive written notification concerning the date, time, location and topics to be covered at the method of distribution public hearings:

4 Housing Authorities in Karnes County: Falls City HA, Karnes City HA, Kenedy HA, and Runge HA; the city and county administrators/elected officials of Karnes County, Falls City, Karnes City, Kenedy, and Runge; the Karnes City and Kenedy Chambers of Commerce (small business membership organizations; they do not have economic development organizations; and the Karnes City Health and Human Services Department.
2 Housing Authorities in Comal County: New Braunfels HA and Schertz HA; city and county administrators/elected officials of Comal County, New Braunfels, Canyon Lake, Bulverde, Garden Ridge, and Schertz. Texas Health and Human Services located in New Braunfels and economic development corporations of Bulverde, New Braunfels, Comal County, and Schertz.
1 Housing Authority in Guadalupe County: Seguin HA; the city/county administrators and elected officials of Guadalupe County, Seguin, Kingsbury, Geronimo, and Marion. The economic development corporations of Seguin and Cibolo. Texas Health and Human Services office in Seguin, Texas.
Community Council of South Central Texas, Local Media, churches and school districts will also be notified in all 3 counties.

The following organizations interested in fair housing issues and representing protected classes of individuals will be contacted to gain additional perspective on fair housing and civil rights issues in the region, and how the people they represent were affected by the disaster(s). Approaches beyond simple written notification of public hearings are required and detailed below:

Besides receiving notice of the public meetings, the following organizations will be contacted: National Association of Latino Community Asset Builders (NALCAB), San Antonio Branch NAACP, LULAC Seguin (#682 District 2), LULAC New Braunfels (#4217, District 2), Texas Rural Legal Aid, Mexican American Legal Defense and Education Fund (MALDEF) Southwest Regional Office (located in San Antonio) to request a meeting to seek input from them on how the people they represent in Karnes, Comal, and Guadalupe were affected by the disaster and to brief them on the available resources.

The COG acknowledges that language differences may play a role in effectively reaching non-English speaking residents. The COG will address these potential barriers by providing notification efforts as follows:

Notices of public hearings will be provided in English and Spanish. Notices will be posted in The Karnes Countywide publication (https://www.mysoutex.com/karnes_countywide/), the New Braunfels Herald-Zeitung (<http://herald-zeitung.com/>), Seguin Gazette (<http://seguingazette.com/news/>), and San Antonio Express News (<https://www.mysanantonio.com/>). All of these publications are available in paper and digitally. La Prensa (<https://laprensasa.com/>), a Spanish publication, and Seguin Daily News (<http://www.seguintoday.com/>) are only available digitally and public notices will be posted on those websites as well.

In addition, notices will also be published on the AACOG website and on the city/county websites of the impacted incorporated communities (Karnes County, Karnes City, Runge, Kenedy; Comal County, New Braunfels, Schertz; Guadalupe County, Seguin, Cibolo, and Kingsbury) and GLO website. If the community does not have an updated website, public notices will also be posted in the communities public building, such as court house, city office, library.

AACOG will also email the notices in English and Spanish to its extensive email distribution lists.

AACOG will also share notices on its FaceBook and Twitter pages.

Public Hearing Content

The public hearings will include a discussion of the following topics:

- The development of housing and community development needs resulting from the disaster(s);
- The amount of funding available;
- All eligible activities under the Community Development Block Grant-Disaster Recovery program, including linking activities to the disaster(s) through direct damage or failure to function;
- Proposed objective factors;
- The COG's draft Method of Distribution.

Required Meeting and Public Hearing Information

To the extent possible, the COG will adhere to the following schedule of hearings and notifications:

Posting of Draft Method of Distribution for Public Review

Date/Time: June 27, 2018/1:00 pm Website Address: www.aacog.com

Public Hearings Scheduling Information

Public Planning Meeting – 1st Public Hearing

Date/Time: June 18, 2018 at 10:00 am Location: Karnes County Courthouse Annex in Karnes City

2nd Public Hearing During Comment Period

Date/Time: July 6, 2018 at 10:00 am Location: Seguin Event Center (Gudalupe County)

Notification consistent with GLO requirements will be provided on or before the following dates:

Dates Personal Notice of Hearings will be sent to entities: June 6, 2018

Dates Notice of Hearings will be published on the COG's Website:

June 6, 2018

Dates Notice of Hearings will be published in regional newspaper(s):

June 13, 2018

The COG understands public hearings shall be held at a time and location compliant with the Americans with Disabilities Act, and convenient to potential or actual beneficiaries. The hearing must include accommodations for persons with disabilities.. The COG will accommodate these needs in the following ways:

All venues for the public planning meeting and public hearings will also be accessible to individuals with disabilities.

If a sign language interpreter is needed, instruction will be provided on the public notice to contact AACOG 72 hours in advance of the meeting to arrange for a sign language interpreter.

The COG understands its responsibility to provide interpretive services when a significant number of non-English speaking residents can be reasonably expected to participate in the public hearing. If these services are determined to be necessary, the COG will address this need as follows:

Should a significant number of non-English residents be expected at any of AACOG's public meetings, Spanish interpreters will be in attendance to provide assistance.

Efforts Exceeding Minimum Participation Requirements

The GLO has encouraged the COG to seek public participation when developing the method of distribution. In pursuit of this goal, the COG held additional meetings and took other additional actions as follows:

While we are only required to hold two public meetings, we have discussed having a 3rd meeting (2nd public hearing) during the 2nd week of July (on or before July 10th) in Comal County.

The MOD will be posted to the AACOG website and available at our office in San Antonio for public review. We will also ask our impacted counties/cities to post the MOD on their public websites and make a copy of the MOD available for review in their local offices as well.

AACOG is also creating a custom email address: disaster_recovery@aacog.com to receive comments from the public.

Meeting #1 Materials

Method of Distribution (MOD) Community Development Block Grant Disaster Recovery (CDBG DR) Funds

Public Planning Meeting Karnes County

presented by

Stella E. Garcia, PhD

Sr. Director of Operations

Alamo Area Council of Governments (AACOG)

June 18, 2018 at 10:00 am



Purpose and Role

Purpose: Public Planning Meeting to gain input on factors for developing a Method of Distribution (MOD)

Roles:

Alamo Area Council of Governments (**AACOG**) is facilitating the meeting and will be developing the MOD to submit to GLO

General Land Office (**GLO**) will administer the programs in the Action Plan



General Land Office (GLO) Action Plan

- US Housing and Urban Development (HUD) allocated \$5.024 billion to Texas in response to Hurricane Harvey, DR-4332
- General Land Office (GLO) has been designated by the governor to administer CDBG DR funds
- GLO developed an Action Plan (submitted May 8, 2018)
- Action Plan includes proposed use of funds
- Use of the funds is limited to unmet recovery needs from DR-4332
- <http://www.glo.texas.gov/recovery/reports/action-plans/index.html>
- <http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>



Action Plan

- 80% of \$5.024 billion will go to most impacted counties (16) and certain zip codes
- 20% of funds go to the remaining 33 eligible counties, including **Comal, Guadalupe, and Karnes**
- COGs will develop local method of distributions (MOD) to local governments and eligible entities for CDBG DR housing and infrastructure funds for 2 of the 8 programs
- National Objectives: low and moderate income (LMI); elimination of slum/blight; urgent need; low/mod buyout (LMB); and low/mod incentive



Action Plan

- Homeowner Assistance Program (\$4.2 M/\$6.0 M)
- Local Buyout and Acquisition Program (\$2.9 M/\$4.1 M)
- Homeowner Reimbursement Program
- Homelessness Prevention Program
- Affordable Rental Program
- Partial Repair and Essential Power for Sheltering (PREPS) Program
- Local Infrastructure Program (\$1 M/\$1.5M)
- Economic Revitalization Program



Local Buyout and Acquisition Program (\$4,152,165)

- Remove homes from harm's way
- Administered by local units of government and entities with the power of eminent domain authority
- Meet the 70% low and moderate income benefit requirement
- Examples of Eligible activities:
 - Buyouts
 - Acquisitions
 - Relocation/Down Payment assistance with buyout and acquisition;
 - Demolition only;
 - Activities designed to relocate families outside of floodplains;
 - FEMA Hazard Mitigation Grant Program cost share.



Local Buyout and Acquisition Program (\$4,152,165)

Acquisition: The utilization of CDBG-DR disaster funds to acquire real property. Acquisition only is typically not considered a complete activity in the Program and must be combined with another eligible use (i.e., relocation assistance). The purchase price must be consistent with applicable uniform cost principles, and pre-disaster Fair Market Value (FMV) may not be used.

- Purchased at Post Event Fair Market Value
- Does not need to revert to Greenspace
- Local entity can rebuild on acquired property
- Down Payment Assistance
- Relocation Assistance



Local Buyout and Acquisition Program (\$4,152,165)

Buyout: A type of acquisition with the purchase of an eligible property with the intent to reduce risk from future flooding or to reduce risk from the hazard that led to the property's Disaster Risk Reduction Area. The property acquired will be dedicated and maintained in perpetuity for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

- Purchased at Pre-Event Fair Market Value
- Becomes Greenspace in perpetuity
- Comes off tax roll
- Down Payment Assistance
- Relocation Assistance



Local Buyout and Acquisition Program (\$4,152,165)

- Minimum grant of \$1,000,000
- Local entity must choose Buyout OR Acquisition (cannot do both in same community)
- Factors to Consider in development MOD
 - Up to 4 entities could be listed
 - $\$4,152,165 \text{ divided by } \$1,000,000 = 4.15$
- 70% of the funds must benefit Low Moderate Income (LMI)
- Home must have had damage associated with Harvey (or exacerbated by Harvey)



Local Infrastructure Program (\$1,530,000)

- Administered by GLO with local units of government (cities and counties) as subrecipients
- Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing
- Examples of Eligible Activities
 - Flood control and drainage repair and improvements, including the construction of rehabilitation of storm water management system;
 - Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
 - Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement



Local Infrastructure Program (\$1,530,000)

- Minimum grant of \$100,000
- Factors to Consider in development of MOD
 - Up to 15 entitles could be listed in MOD
 - $\$1,530,000 \text{ divided by } \$100,000 = 15.3$
- 70% of the funds must benefit Low Moderate Income (LMI)
- Infrastructure must have been damaged by Harvey (or exacerbated by Harvey)



Method of Distribution

- COG will facilitate a method of distribution (MOD) process with support of GLO
- Establish objective process for allocation of funds to eligible entitles or activities (distribution based on, but not limited to, unmet need)
- Citizen Participation Process
 - Develop citizen participation plan
 - Conduct a minimum of two (2) public hearings prior to finalizing the MOD
 - One (1) public hearing shall be a "Public Planning Meeting"
 - Ensure a public comment period of at least 14 days



Method of Distribution

- For Local Buyout and Acquisition: implement a minimum of \$1,000,000 to any local entity receiving funding through the MOD
- For Local Infrastructure: implement a minimum of \$100,000 to any local entity receiving funding through the MOD
- Facilitate local prioritization through the MOD
- A plan to meet the 70% low- and moderate-income benefit requirement
- Establish any additional parameters for eligibility beyond what is required by HUD or the GLO
- MOD is due to GLO by July 13, 2018



MOD Factors

- Factors that have been used by COGs in past disasters
 - LMI percentage for entity AND/OR share of county LMI
 - Population of entity
 - FEMA claims by Household
 - NFIP repetitive claims
 - Reported Value of Disaster Impact of entity
 - FEMA/SBA/TDEM Damage Reports
 - Number of times affected by declared disaster since 2015



Possible MOD Factor: Population

Community	Population	Percent
Comal	141,009	44.64
Guadalupe	159,659	50.54
Karnes	15,187	4.81
Total	315,855	99.99

Weighted against other factors
Cities within each county

US Census Bureau, Population Estimates 2017



Possible MOD Factor: # of damage reports

Community	# of Individual Assistance Applications	# of Public Assistance Reports
Comal	26	19
Guadalupe	106	20
Karnes	389	6
Total	521	45

Weighted against other factors
Cities within each county



Possible MOD Factor: # of times affected by declared disaster since 2015

Community	# of times affected by disaster since 2015
Comal	3
Guadalupe	3
Karnes	1



Other MOD Factors to Consider

- Comal County: **New Braunfels**, **Bulverde/Spring Branch**, **Garden Ridge**, **Canyon Lake**
- Guadalupe County: **Sequin**, **Cibolo**, **Schertz**, **Selma**, **Marion**, **McQueeny**, **Lake Dunlap**, **Kingsbury**, **Geronimo**, **Martindale**
- Karnes County: **Karnes City**, **Kenedy**, **Falls City**, **Runge**, **Gillett**

Public Assistance
Housing/IA



Other MOD Factors to Consider

Public Feedback

- Open Forum
- Can also send feedback to disaster_recovery@aacog.com



Next Steps

June 27, 2018: draft Method of Distribution presented to AACOG Board of Directors

June 27, 2018: by 3:00 pm, draft MOD will be placed on AACOG website: www.aacog.com (14 day public comment begins); will distribute to cities/counties as well

July 6, 2018: Public Hearing at Seguin Event Center at 10:00 am for comments on MOD

July 13, 2018: MOD submitted to General Land Office (GLO)



Point of Contact

Stella Garcia
Sr. Director of Operations
210-362-5252
sgarcia1@aacog.com



Public Planning Meeting
 June 18, 2018 at 10:00 am
 AACOG Method of Distribution

Name	Address	Phone Number	Email Address	Organization
1. Kevin Moehrig	400 S Front ST	830 780 3122	KMOEHRI@CITYOFKEN	CKC
2. Barbara Shaw	303 W Main Kearney	503-2230	barbana@ cityofkearney.org	COBK
3. Amanda Weber	"	"	amanda@ cityofkearney.org	COBK
4. Brandon Kaiser	512-915-7560		Brandon.Kaiser @glo.teresa.gov	GLO
5. Allison Lippay	307 N Southview			C. Council Kearney City
6. David N. Moaps	PO Box 56	830.583.9670		NADA
7. Mary Lozano	210 W Calvert Suite 160 KC	830 623 1344	M.lozano@ co.karnes.tx.us	Karnes Co - Pt B Commissioner
8. Shelby Dupnik	"		shelby.dupnik@ co.karnes.tx.us	Karnes Co Commissioner
9. Judge Long	"	830 623 1344	countyjudge@ co.karnes.tx.us	Karnes Co County Judge
10. Justin Meyer	210 W Calvert Suite 160 Kearney City	830 400 2870	countyjudge@ co.karnes.tx.us or justin@cityof kenedy.org	Karnes County administrator + Kenedy Councilman (District 4)

Public Planning Meeting
 June 18, 2018 at 10:00 am
 AACOG Method of Distribution

Name	Address	Phone Number	Email Address	Organization
11. Robert Evans	314 E Calvert Ave Karnes City TX 78114	830-780- 3422	revans@cityof kctx.com	Karnes City City Manager
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				

Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of \$4,152,165 for Housing (Local Buyout and Acquisition Program) and \$1,530,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4332 Hurricane Harvey) are Comal, Guadalupe, and Karnes County. A **Public Planning Meeting** is scheduled for the following date, time and location:

Monday, June 18, 2018, at 10:00 am at the Karnes County Courthouse Annex located at 210 W. Calvert, Karnes City, Texas, 78118.

A draft MOD will be developed from input received at the Public Planning Meeting. The draft MOD will be submitted to the AACOG Board of Directors on June 27, 2018, (10:00 am) for review and approval. Written and oral comments regarding this draft MOD will be taken at a **Public Hearing** scheduled for the following date, time and location:

Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Coliseum) located at 950 S. Austin Street, Seguin, Texas 78155.

The Draft MOD will be posted on Wednesday, June 27, 2018, at 3:00 pm on AACOG's website (www.aacog.com) and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.com.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.

Notificación de Audiencia Pública

Invitación al público para hacer comentarios

Por este medio se informa que el Consejo de Gobiernos de la Región del Álamo (*Alamo Area Council of Governments - AACOG*) va a recibir sugerencias sobre el método de distribución (*Method of Distribution - MOD*) de \$4,152,165 para la Vivienda (Programa Local de Adquisiciones) y de \$1,530,000 para infraestructura, con fondos del programa de subsidios para el desarrollo de la comunidad para la recuperación del desastre del Huracán Harvey *Hurricane Harvey Community Development Block Grant Disaster Recovery Funds(CDBG DR)*.

Los condados de AACOG designados como que sufrieron un impacto, con base en la Declaración de Desastre Federal (DR 4332 Huracán Harvey) son los Condados de Comal, Guadalupe, y Karnes.

Una reunión pública para la planificación está programada para la siguiente fecha, hora y ubicación:

Lunes, 18 de junio de 2018, a las 10:00 a.m. en el Anexo a Karnes County Courthouse, situado en 210 W. Calvert, Karnes City, Texas, 78118.

Se hará un proyecto MOD preliminar a partir de los comentarios y sugerencias recibidos en la reunión pública de planificación. El proyecto MOD será presentado a la Junta de Directores de AACOG el 27 de junio de 2018 (10:00) para su revisión y aprobación.

Habrá otra audiencia pública para recibir comentarios y observaciones escritas y orales sobre este proyecto MOD que está programada para la siguiente fecha, hora y ubicación:

Viernes, 6 de julio de 2018, a las 10:00 am en la Seguin Event Center (Coliseo) ubicado en 950 S. Austin Street, Seguin, Texas 78155.

El proyecto MOD será publicado el miércoles, 27 de junio de 2018, a las 3:00 pm en el sitio web de AACOG (www.aacog.com) y también estará disponible en el 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Los comentarios y observaciones adicionales, por escrito, deberán ser recibidos por AACOG a más tardar a las 5:00 p.m. del jueves, 12 de julio de 2018, a la atención de Stella García, Directora de Operaciones Senior, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 o disaster_recovery@aacog.com.

AACOG proporcionará adaptaciones razonables para las personas que asisten a las reuniones de AACOG. Las solicitudes de las personas que necesitan adaptaciones especiales deberán ser recibidas por los empleados de AACOG 72 horas antes del evento. Las reuniones públicas se llevarán a cabo en inglés y las solicitudes de intérpretes para otro idioma, o de otras necesidades especiales en materia de comunicación, deberán hacerse al menos 72 horas antes de cada evento. Por favor llame al 210-362-5252 para recibir más información.

Event Details

Public Hearing Notice- Solicitation for Public Comment

Monday, June 18, 2018

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Date: June 18, 2018

Time: 10:00 AM - 12:00 PM

Time 10:00 A.M.

Details:

Location: Karnes County Courthouse Annex

Address: 210 W. Calvert
Karnes City, TX 78118

Contact: 210-362-5252

Email: Contact
(mailto:disaster_recovery@aacog.com)

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

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AFFP

C-LEGAL 3X5 Infrastructure

Affidavit of Publication

STATE OF TEXAS }
COUNTY OF COMAL }

SS

C-LEGAL 3X5 AACOG
AD 00203429

Jennifer Saunders-Debruyne, being duly sworn, says:

That she is Designee of the New Braunfels Herald-Zeitung, a daily newspaper of general circulation, printed and published in New Braunfels, Comal County, Texas; that the publication, a copy of which is attached hereto, was published in the said newspaper on the following dates:

June 14, 2018

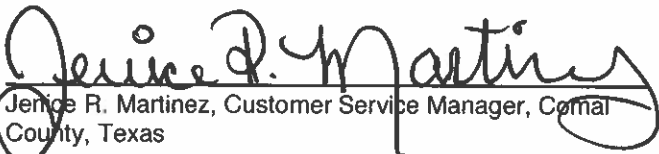
That said newspaper was regularly issued and circulated on those dates.

SIGNED:



Designee

Subscribed to and sworn to me this 14th day of June 2018.

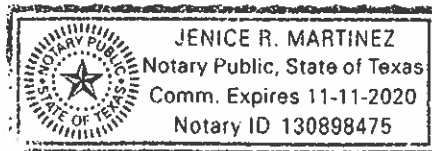


Jenice R. Martinez, Customer Service Manager, Comal County, Texas

My commission expires: November 11, 2020

b0102196 00203429 (210)824-6011

Lisy Velazquez
Alamo Area Council of Governments-PBS
8700 Tesoro Dr., Ste. 700
SAN ANTONIO, TX 78217



06/14/18

Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of \$4,152,165 for Housing (Local Buyout and Acquisition Program) and \$1,530,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4332 Hurricane Harvey) are Comal, Guadalupe, and Karnes County. A Public Planning Meeting is scheduled for the following date, time and location:

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Beeville Publishing Co., Inc.

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 Beeville Bee-Pitayune Refugio County Press THE PROGRESS The Karnes Countywide
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 Goliad Advance-Guard www.mySouTex.com **Action Printing**

111 N. Washington • PO Box 10 • Beeville TX 78104
 361.358.2550 office@mysoutex.com

AFFIDAVIT of PUBLICATION

THE STATE OF TEXAS

COUNTY OF BEE

Before me, the undersigned authority, on this day personally appeared George G. Latcham, known to me, who, by me duly sworn, on his oath deposes and says that he is the Publisher of the Karnes Countywide, having general circulation in Karnes County, who being by me duly sworn, deposes and says that the foregoing attached notice was published in said newspaper on the following date(s), to wit:

June 13, 2018

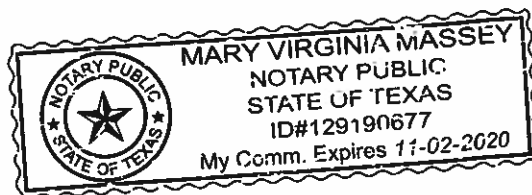


George G. Latcham, Publisher

Sworn to and subscribed before me by George G. Latcham, this the 13 day of June 2018 AD to certify which witness my hand and official seal.



Mary Virginia Massey,
 Notary Public in and for the State of Texas



The Karnes Countywide Classifieds

ay, June 13, 2018

Page 9A

aces 0750 Storage Space 0780

HOME LOT: 50x125
t 814 N. Esplanade,
City, Texas, \$235
Call 281-342-5128.

MINI STORAGE: 10x10, \$50;
10x15, \$60; 10x20, \$70. Joe's
Mini Storage, 1005 East Main,
Karnes City, 361-449-6557.

800
REAL ESTATE

Houses 0830

HOME FOR SALE: in Karnes
City. On FM99, 1 acre. \$85,000.
3 bedroom, 1 bath. Needs work.
Commercial/residential, priced
with that in mind. Check it out
on Zillow site. 830-623-0056.

900
PUBLIC NOTICES

Legals 0910

PUBLIC NOTICE

Notice is hereby given that the
Kenedy Independent School
District will hold a Public Hearing
at 6:00 PM, on June 25,
2018 in the KISD Administration
Building Cafeteria, 401 FM 719,
Kenedy, TX 78119. Items to be
discussed are the 2018-2019
Targeted Improvement Plans for
Kenedy High School, an Im-
provement Required Campus.
WO6-13

INVITATION TO BIDDERS

1. Sealed Bids addressed to Mr.
Robert Evans, City Manager of
the City of Karnes City, Texas,
will be received at the City Hall,
314 E. Calvert Ave., Karnes
City, Texas, 78118 until 2:00
P.M., Thursday, June 21, 2018,
for the construction of the:
**CITY OF KARNES CITY
2018 STREET OVERLAY
PROJECT**

The Proposals will be publicly
opened and read aloud at this
time and place. Any Proposal
received after closing time will
be returned unopened. No Propo-
sal may be withdrawn within
thirty (30) days after the date on
which Proposals were opened.

Legals 0910

NOTICE TO CREDITORS

Notice is hereby given that
original Letters Testamentary for
the Estate of **LINDA JO HICKS,**
Deceased, were issued on
April 1, 2018, in Cause No.
2017-006066, pending in the
County Court of Karnes County,
Texas, to **LLOYD HICKS.**
All persons having claims
against this Estate which is
currently being administered are
required to present them within
the time and in the manner pre-
scribed by law.

**c/o Norman L. Burns
Attorney at Law
1606 N. Sarah DeWitt Drive
Gonzales, TX 78629
DATED the 8th day of June,
2018.**

NORMAN L. BURNS
Attorney for Lloyd Hicks, Jr.
State Bar No. 03448500
1606 N. Sarah DeWitt Drive
Gonzales, Texas 78629
Tel. (830) 672-9511
Fax. (830) 672-7638
Email:
nbums@munsonbums.com
WO6-13

**Karnes City ISD School
Surplus Sale
Roger E. Sides Elementary
Tennis Courts
221 North Esplanade
Karnes City, Texas
Friday, June 15, 2018
7:00 a.m. to 3:00 p.m.**

KCISD will dispose of surplus
materials, equipment, and sup-
plies. Items will be sold in lots
with prices as marked to in-
clude: *motor vehicles, school
buses, desks, student desks,
chairs, tables, refrigerator, and
miscellaneous surplus items.*
Vehicles must be moved off the
lot on or before June 22. All oth-

Legals 0910

NOTICE TO CREDITORS

Notice is hereby given that
original Letters Testamentary for
the Estate of **CAROL EDGAR
MARKOWSKY,** Deceased,
were issued on May 18, 2018, in
Cause No. PR-2018-0019
pending in the County Court of
Karnes County, Texas, to: **VICKI
JO MARKOWSKY,** Independ-
ent Executrix of the Estate of
CAROL EDGAR MARKOWSKY.
All persons having claims
against this Estate which is
currently being administered are
required to present them to the
undersigned within the time and
in the manner prescribed by law.
**VICKI JO MARKOWSKY,
Independent Executrix of the
Estate of**

**CAROL EDGAR
MARKOWSKY,
Deceased
c/o: Sue C. Ortman
Attorney at Law
403 St. George
Gonzales, Texas 78629
DATED the 11th day of June,
2018.
SUE C. ORTMAN
Attorney for
VICKI JO MARKOWSKY,
Independent Executrix of the
Estate of
CAROL EDGAR
MARKOWSKY,
Deceased
State Bar No.: 15324425
403 St. George
Gonzales, Texas 78629
Telephone: (830) 672-9535
Facsimile: (830) 672-8654
E-mail: ortman@gvec.net
WO6-13pd**

**Solicitation for
Public Comment**



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HOME PLUS EXTRA LOT AT 909 NORTH PANNA MARIA in Karnes City.....NEW \$69,000

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100 SQ. FT. HOME ON SOUTH PANNA MARIA ST, in Karnes City.....NEW \$129,000

ACRE SURFACE ONLY) NEAR FASHING (WEST OF KARNES CITY).....CONTRACT \$3,000/ACRE

ACRE FAMILY RESTAURANT (PALACE CAFE) In Falls City, TX, on Hwy 181. Includes all fixtures & equipment... REDUCED \$135,000

ACRE RESTAURANT (JERRY B'S) in Kenedy Texas on Hwy 181, 3.9 acres, Bar, Stage, Dance floor, includes all fixtures and equipment... REDUCED \$745,000

ACRE HISTORIC 3BD/2BA Home with High Ceilings, 2 large Metal Sheds, Good water well.....\$372,000

ACRE SOUTH OF KENEDY, Lots of Brush, Good Hunting, Will Divide.....REDUCED \$4,000/ACRE

ACRE 100 SQ FT OFFICE SPACE - Downtown Karnes.....

\$372,000

REDUCED \$4,000/ACRE

FOR LEASE

REDUCED \$57,000

FOR LEASE

SOLD \$239,000

SOLD \$220,000

DR. SOLD \$189,000

SOLD IN 24 HRS! \$169,000

SOLD \$159,000

SOLD \$159,000

SOLD \$149,000

SOLD \$139,000

received after closing time will be returned unopened. No Proposal may be withdrawn within thirty (30) days after the date on which Proposals were opened. Proposals shall be plainly marked with the name and address of the bidder and the following words:

**City of Karnes City, Texas
2018 Street Overlay Project**
2. The work under this Contract consists of street overlay on portions of approximately thirty city streets in Karnes City.
3. Plans, specifications, and bidding documents are available to view or download free of charge at CivCast:

www.civcastusa.com.
Bidders wishing to obtain hard copies of bid documents may purchase them from CivCast. These contract documents may be seen for examination without charge at the following places:

**City of Karnes City
314 E. Calvert Ave.
Karnes City, Texas 78118
Thonhoff Consulting Engineers
1301 Capital of TX Hwy. S.,
#A-236
Austin, Texas 78746**

4. Contact Robert H. Thonhoff, Jr., P.E., Project Manager, at RThonhoff@TCEtx.com, or (512) 328-6736 with any questions.

5. A cashier's check, certified check or acceptable bidder's bond, payable to the City of Karnes City in the amount not less than five (5%) percent of the bid submitted, must accompany each bid as a guarantee that, if awarded the Contract, the bidder will enter into a Contract and execute bonds within fifteen (15) days of award of Contract as required by the Contract Documents.

The bidder's deposit shall be forfeited and become the property of the Owner in case the bidder neglects or refuses to enter into a Contract and furnish bonds acceptable to the Owner within fifteen (15) days after bidder's proposal has been accepted.

6. The bid deposit of all except the three best bidders will be returned within fifteen (15) days after the opening of bids. The bid deposits of the three best bidders will be returned within 48 hours after the executed Contract and required bonds have met final approval by the Owner.

7. ACCEPTANCE OF BIDS. The Owner reserves the right to reject any and all bids and waive any informalities and irregularities in bids received. This project is being evaluated utilizing a "Best Value" method. Bid will be awarded using the Selection Criteria detailed in the "Instructions to Bidders", Section 00100 of the Project Manual.

CITY OF KARNES CITY
Robert Evans, City Manager
WO6-6&13

buses, desks, student desks, chairs, tables, refrigerator, and miscellaneous surplus items. Vehicles must be moved off the lot on or before June 22. All other items must be removed by 5:00 pm the day of the sale. Special consideration might be arranged. Buyer is responsible for removal of purchased items. KCISD cannot provide assistance with loading or hauling. Sales are cash only with no change available. All sales are final. Unsold items will be disposed of appropriately.

WO6-6&13

**Architect Services
(Statement of Qualifications)**

Purpose: Atascosa Health Center Inc. a Federally Qualified Health Center, 501c3 non-for-Profit Corporation is requesting proposals for Architect Services for the purpose of designing all aspects of two Medical/Dental/ Behavioral Health facilities. The purpose is to design one facility and to use the one design to build two facilities; one will be built in Karnes City, Karnes County Texas; and the other in Floresville, Wilson County Texas.

Qualifications

1. General description and history of the firm.
 2. Specialized Experience in the Medical/Dental/Behavioral Facilities
 3. Capacity to accomplish the work within the established schedule
 4. Quality of Performance on past Medical/Dental/Behavioral Facilities projects.
 5. Volume of Work currently in progress
 6. Qualifications of key personnel assigned to projects
 7. Experience in USDA requirements
 8. Description of the firm's capabilities, including in-house engineering
 9. A statement of the reasons your firm is the best qualified for the project.
 10. A list of recent projects (especially those of a similar nature) with type, size, budget and schedule information.
 11. A list of the firm's current projects and how the proposed project fits into the firm's workload and schedule.
- Atascosa Health Center Inc. reserves the right to reject any and all SOQ and to waive all technicalities. **Please send Statement of Qualifications to 310 W. Oaklawn, Pleasanton, Texas 78064 . Statements are due by the close of business Friday, June 22, 2018.** For further information please contact Monty Small, CEO Atascosa Health Center, Inc. at 830-569-8940 ext. 2101.

WO6-13

**Solicitation for
Public Comment**

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**Monday, June 18, 2018
at 10:00 am at the
Karnes County
Courthouse Annex
located at 210 W. Calvert
Karnes City, Texas, 78118**

A draft MOD will be developed from input received at the Public Planning Meeting. The draft MOD will be submitted to the AACOG Board of Directors on June 27, 2018, (10:00 am) for review and approval. Written and oral comments regarding this draft MOD will be taken at a Public Hearing scheduled for the following date, time and location:

**Friday, July 6, 2018
at 10:00 am at the
Seguin Event Center
(Coliseum) located at
950 S. Austin Street
Seguin, Texas 78155.**

The Draft MOD will be posted on Wednesday, June 27, 2018, at 3:00 pm on AACOG's website (www.aacog.com) and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217. Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.com. AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.

WO6-13

Kenedy, LLC

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Realtor
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mer lot on the corner of truck route 72 s intersection. High visibility with easy wy 181 in Kenedy. City utilities. \$29,900 acres with FM 1145 (Flax Plant Rd) tract off Hwy 181, Kenedy. Close to 72. Great for oilfield yard. \$86,000 acres located a few miles south of y 181. TxDot entrance installed, Nice \$600 MAJOR REDUCTION \$25,000 acres on Hwy 72 & Hwy 239, water \$1,000

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find 800 sq ft bldg on approx. 1/4 181 frontage. Paved parking, all city nk fence. \$98,000 (7.94 acre) on 5th St-Kenedy, zones city utilities available. \$110,000 Market, Karnes City. 1200 SF Office leled with reception area, 5 private hen & bathroom. Cov. rear parking, . \$95,000 ne and well known restaurant known ce" in Hobson is back on the market! dg has been remodeled and looks rnings, equipment and inventory the sale. There is also a large metal the 3+/- acres that can be leased out ncome. 750' Highway frontage, lots 649,500 **REDUCED, MOTIVATED** 00

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STATE OF TEXAS:
COUNTY OF BEXAR

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared: Lynette Nelson, who after being duly sworn, says that she is the BOOKKEEPER of HEARST NEWSPAPERS, LLC - dba: SAN ANTONIO EXPRESS-NEWS, a daily newspaper published in Bexar County, Texas and that the publication, of which the annexed is a true copy, was published to wit:

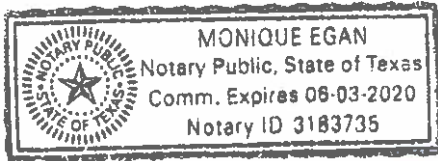
Customer ID: 705701
Customer Name: Alamo Area Council Of Govt
Order ID: 2966423

Publication	Pub Date
EN Classified	17-JUN-18

Lynette Nelson
Bookkeeper

Sworn and subscribed to before me, this 20 day of June A.D. 2018

Notary public in and for the State of Texas



PUBLIC HEARING NOTICE

Solicitation for Public Comment

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 water included
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NOTICES

Legal Notices

NOTICE OF PUBLIC SALE
 Of property to satis-

Legal Notices

NOTICE TO CREDITORS

Notice is hereby given that original Letters of Independent Administration with Will Annexed for the Estate of Erma Lou Engbrock, Deceased, were issued on June 4, 2018, in Cause No. 2018-PC-0154, pending in the County Court of Guadalupe County, Texas, to: Barbara Ann Engbrock Gettig.
 At the request of the Independent Administrator with Will Annexed, claims may be presented to and addressed to the following attorney:

Legal Notices

Legal Notices

Representative Est. of Erma Lou Engbrock., Deceased
 c/o A. Robert Raetzsch Knobles, Raetzsch, Moore & Eved, L.L.P.
 202 N. Camp Street Seguin, Texas 78155

All persons having claims against this Estate which is currently being administered are required to present them within the time and in the manner prescribed by law. DATED June 4, 2018.
 A. ROBERT RAETZSCH
 State Bar Card No. 16460300
 raetzsch@aol.com

Legal Notices

Attorney for Independent Administrator with Will Annexed



THE CLASSIFIEDS RIGHT ON THE MONEY!

Trade your unwanted items for fast cash with the Classifieds.

Legal Notices

Legal Notices

THE STATE OF TEXAS
 COUNTY OF GUADALUPE

BY VIRTUE OF ORDERS OF SALE DATED the 25th day of Texas, by the Clerk of said Court on said date in the hereinabove the 25th day of May, 2018, seized, levied upon, and will on the Seguin, Texas 78155, at 10:00 A.M. on said day, proceed to sell to the following described real estate levied upon as the property:

All of the following properties being located in Guadalupe County Volume and Page reference (V...P...) or document number herein are the addresses on the tax records and may or may not be

PROP #	CAUSE #	STYL
1	11-0788-CV	County of Guadalupe v Pa
2	13-1018-CV	The County of Guadalupe, Davila, et
3	13-1018-CV	The County of Guadalupe, Davila, et
4	13-1583-CV	The County of Guadalupe, Seest, et
5	13-2198-CV	The County of Guadalupe, Williams,
6	13-2226-CV	The County of Guadalupe, Webb
7	14-0878-CV	The County of Guadalupe, et al
8	14-2729-CV	The County of Guadalupe, Euse, et al
9	15-0394-CV	The County of Guadalupe, et al
10	15-1026-CV	The County of Guadalupe, Maddox, et

PROP #	CAUSE #	STYLE
11	15-1532-CV	The County of Guadalupe, Flores, et al
12	15-1955-CV	The County of Guadalupe, DeLeon Diaz,
13	15-2009-CV	The County of Guadalupe, Katzberg
14	15-2033-CV	The County of Guadalupe, Te Sanders, Individually and as Beverly Papa,
15	15-2158-CV	The County of Guadalupe, Mayen Schaeffer,
16	16-1678-CV	The County of Guadalupe, Herron, et al
17	16-2135-CV	The County of Guadalupe, Williams, et
18	16-2570-CV	The County of Guadalupe, et al
19	17-0427-CV	The County of Guadalupe, Espinola, Sr. et

THE FOLLOWING PROPERTIES HELD IN TRUST PURSUANT TO 4.141

20	12-0554-CV	The County of Guadalupe, T Deising, et al
21	12-2218-CV	The County of Guadalupe, Te Hinson, et al
22	15-1164-CV	The County of Guadalupe, T Matthews, et al
23	16-0379-CV	The County of Guadalupe, Johnson, Jr., Trustee for 705 St al
24	16-0379-CV	The County of Guadalupe, Johnson, Jr., Trustee for 705 St al

Public Hearing Notice
 Solicitation for Public Comment

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Meeting #2 Materials

AACOG Public Hearing
Community Development Block Grant Disaster Recovery (CDBG DR)
Development of Method of Distribution (MOD)

Meeting Minutes
July 6, 2018

Seguin Event Center
Seguin, Texas
10:00 am

- I. Guests were asked to sign in (refer to attached sign in sheet).
- II. Public Hearing was convened by Dr. Stella Garcia, Senior Director of Operations from AACOG.
- III. Dr. Garcia provided an overview of the Action Plan and the purpose of the Public Hearing and used a PowerPoint presentation to guide the discussion (attached).
- IV. Dr. Garcia described which two programs AACOG had developed a method of distribution (MOD) and provided definitions as well (refer to attached PowerPoint).
- V. Dr. Garcia provided a list of factors that had been used by other COGs in past MOD developments to consider and then reviewed the three (3) factors that AACOG used and the associated data that was used to calculate the allocations. Dr. Garcia indicated that she had access to certain FEMA reports, such as Individual Assistance and Public Assistance reports as well as Small Business Administration (SBA) loan reports. For damage reports, Dr. Garcia indicated that almost 400 residents in Karnes County had submitted an Individual Assistance application to FEMA indicated damage to their homes more than Comal and Guadalupe County combined. But for Infrastructure, not as many FEMA Public Assistance reports were submitted between the cities and county compared to Comal County. For repeat disasters, Dr. Garcia indicated that while Karnes County had only been included in the most recent federal disaster declaration (Hurricane Harvey), the other two counties, Comal and Guadalupe had been named in three (3) federal disaster declarations since 2015. (Refer to attached PowerPoint).

The weighted factors are proposed as follows: 50% for damage reports; 25% for population; 25% for repeat disasters for both housing and infrastructure allocations.
- VI. Because some of the towns/cities did not meet the \$100,000 threshold for the infrastructure allocations as required in the GLO Action Plan, an alternative method of distribution was described which would add the allocations of those cities/towns to the county allocation. A copy of the allocations (spreadsheet) was also made available (refer to attached allocation spreadsheet).
- VII. No Questions were asked nor comments made.

VIII. Public Hearing concluded at approximately 10:25 am.

Method of Distribution (MOD) Community Development Block Grant Disaster Recovery (CDBG DR) Funds

Public Hearing Seguin Event Center

presented by

Stella E. Garcia, PhD

Sr. Director of Operations

Alamo Area Council of Governments (AACOG)

July 6, 2018 at 10:00 am



Purpose and Role

Purpose: Public Hearing is to hear comments on the draft Method of Distribution (MOD)

Roles:

Alamo Area Council of Governments (**AACOG**) is facilitating the meeting and has developed the MOD to submit to GLO

General Land Office (**GLO**) will administer the programs in the Action Plan



General Land Office (GLO) Action Plan

- US Housing and Urban Development (HUD) allocated \$5.024 billion to Texas in response to Hurricane Harvey, DR-4332
- General Land Office (GLO) has been designated by the governor to administer CDBG DR funds
- GLO developed an Action Plan (submitted May 8, 2018)
- Action Plan includes proposed use of funds
- Use of the funds is limited to unmet recovery needs from DR-4332
- <http://www.glo.texas.gov/recovery/reports/action-plans/index.html>
- <http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>



Action Plan

- 80% of \$5.024 billion will go to most impacted counties (16) and certain zip codes
- 20% of funds go to the remaining 33 eligible counties, including **Comal, Guadalupe, and Karnes**
- COGs will develop local method of distributions (MOD) to local governments and eligible entities for CDBG DR housing and infrastructure funds for 2 of the 8 programs
- **National Objectives:** low and moderate income (LMI); elimination of slum/blight; urgent need; low/mod buyout (LMB); and low/mod incentive



Action Plan

- Homeowner Assistance Program (\$4.2 M/\$6.0 M)
- Local Buyout and Acquisition Program (\$2.9 M/\$4.1 M)
- Homeowner Reimbursement Program
- Homelessness Prevention Program
- Affordable Rental Program
- Partial Repair and Essential Power for Sheltering (PREPS) Program
- Local Infrastructure Program (\$1 M/\$1.5M)
- Economic Revitalization Program



Local Buyout and Acquisition Program (\$4,152,165)

- Remove homes from harm's way
- Administered by local units of government and entities with the power of eminent domain authority
- Meet the 70% low and moderate income benefit requirement
- Examples of Eligible activities:
 - Buyouts
 - Acquisitions
 - Relocation/Down Payment assistance with buyout and acquisition;
 - Demolition only;
 - Activities designed to relocate families outside of floodplains;
 - FEMA Hazard Mitigation Grant Program cost share.



Local Buyout and Acquisition Program (\$4,152,165)

Acquisition: The utilization of CDBG-DR disaster funds to acquire real property. Acquisition only is typically not considered a complete activity in the Program and must be combined with another eligible use (i.e., relocation assistance). The purchase price must be consistent with applicable uniform cost principles, and pre-disaster Fair Market Value (FMV) may not be used.

- Purchased at Post Event Fair Market Value
- Does not need to revert to Greenspace
- Local entity can rebuild on acquired property
- Down Payment Assistance
- Relocation Assistance



Local Buyout and Acquisition Program (\$4,152,165)

Buyout: A type of acquisition with the purchase of an eligible property with the intent to reduce risk from future flooding or to reduce risk from the hazard that led to the property's Disaster Risk Reduction Area. The property acquired will be dedicated and maintained in perpetuity for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

- Purchased at Pre-Event Fair Market Value
- Becomes Greenspace in perpetuity
- Comes off tax roll
- Down Payment Assistance
- Relocation Assistance



Local Buyout and Acquisition Program (\$4,152,165)

- Minimum grant of \$1,000,000
- Local entity must choose Buyout OR Acquisition (cannot do both in same community)
- Factors to Consider in development MOD
 - Up to 4 entities could be listed
 - $\$4,152,165 \text{ divided by } \$1,000,000 = 4.15$
- 70% of the funds must benefit Low Moderate Income (LMI)
- Home must have had damage associated with Harvey (or exacerbated by Harvey)



Local Infrastructure Program (\$1,530,000)

- Administered by GLO with local units of government (cities and counties) as subrecipients
- Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing
- Examples of Eligible Activities
 - Flood control and drainage repair and improvements, including the construction of rehabilitation of storm water management system;
 - Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
 - Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement



Local Infrastructure Program (\$1,530,000)

- Minimum grant of \$100,000
- Factors to Consider in development of MOD
 - Up to 15 entitles could be listed in MOD
 - $\$1,530,000 \text{ divided by } \$100,000 = 15.3$
- 70% of the funds must benefit Low Moderate Income (LMI)
- Infrastructure must have been damaged by Harvey (or exacerbated by Harvey)



Method of Distribution

- COG will facilitate a method of distribution (MOD) process with support of GLO
- Establish objective process for allocation of funds to eligible entitles or activities (distribution based on, but not limited to, unmet need)
- Citizen Participation Process
 - Develop citizen participation plan
 - Conduct a minimum of two (2) public hearings prior to finalizing the MOD
 - One (1) public hearing shall be a "Public Planning Meeting"
 - Ensure a public comment period of at least 14 days



Method of Distribution

- For Local Buyout and Acquisition: implement a minimum of \$1,000,000 to any local entity receiving funding through the MOD
- For Local Infrastructure: implement a minimum of \$100,000 to any local entity receiving funding through the MOD
- Facilitate local prioritization through the MOD
- A plan to meet the 70% low- and moderate-income benefit requirement
- Establish any additional parameters for eligibility beyond what is required by HUD or the GLO
- MOD is due to GLO by July 13, 2018



MOD Factors

- Factors that have been used by COGs in past disasters
 - LMI percentage for entity AND/OR share of county LMI
 - Population of entity
 - FEMA claims by Household
 - NFIP repetitive claims
 - Reported Value of Disaster Impact of entity
 - FEMA/SBA/TDEM Damage Reports
 - Number of times affected by declared disaster since 2015



Possible MOD Factor: Population

Community	Population	Percent
Cornal	141,009	44.64
Guadalupe	159,659	50.54
Karnes	15,187	4.81
Total	315,855	99.99

Weighted against other factors
Cities within each county

US Census Bureau, Population Estimates 2017



Possible MOD Factor: # of damage reports

Community	# of Individual Assistance Applications	# of Public Assistance Reports
Cornal	26	19
Guadalupe	106	20
Karnes	389	6
Total	521	45

Weighted against other factors
Cities within each county



Communities which submitted Damage Reports

- Comal County: New Braunfels, Bulverde/Spring Branch, Garden Ridge, Canyon Lake
- Guadalupe County: Seguin, Cibolo, Schertz, Selma, Marion, McQueeney, Lake Dunlap, Kingsbury, Geronimo, Martindale
- Karnes County: Karnes City, Kenedy, Falls City, Runge, Gillett

Public Assistance
Housing/IA



Possible MOD Factor: # of times affected by declared disaster since 2015

Community	# of times affected by disaster since 2015
Comal	3
Guadalupe	3
Karnes	1



Public Comments

- Open Forum
- Can also send feedback to disaster_recovery@aacog.com



Next Steps

July 6, 2018: Public Hearing at Seguin Event Center at 10:00 am for comments on MOD

July 13, 2018: MOD submitted to General Land Office (GLO)

July 25, 2018: AACOG Board ratifies MOD

July/August: GLO will release guidelines for Housing and Infrastructure Programs

Fall 2018: GLO will survey communities for Planning activities



Points of Contact

Primary Contact

Stella Garcia
Sr. Director of Operations
210-362-5252
sgarcia1@aacog.com

Secondary Contracts

Claudia Mora
Director of Regional Services

cmora@aacog.com

Al Cervera
Regional Disaster Recovery
Coordinator

acervera@aacog.com



Public Hearing
 July 6, 2018 at 10:00 am
 Seguin Event Center
 AACOG Method of Distribution

Name	Address	Phone Number	Email Address	Organization
1. Deane Rosh	8700 Tesoro	210-362-5221	droshe@aacog.com	AACOG
2. Claudia Mora	8700 Tesoro	210-918-1284	cmora@aacog.com	AACOG
3. Al Cervera	8700 Tesoro	210-687-8364	acervera@aacog.com	AACOG
Stella Garcia	8700 Tesoro SA	210-362-5552	sgarcia1@aacog.com	AACOG
5.				
6.				
7.				
8.				
9.				
10.				

Public Hearing
July 6, 2018 at 10:00 am
Seguin Event Center
AACOG Method of Distribution

Name	Address	Phone Number	Email Address	Organization
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				

Stella Garcia

From: Stella Garcia
Sent: Wednesday, June 27, 2018 3:09 PM
To: 'cdr@glo.texas.gov'; 'Shawn Strange'; Alexandra Gamble; 'Ginny Lewis'
Subject: AACOG MOD on website

<http://aacog.com/> found at the bottom left corner of the page under the heading of "public comments"

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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There is a recognized gap between the needs and responsibilities of the law enforcement community and the optimal way to interact with persons with special needs, especially those on the autism spectrum. This course strives to bridge that gap.

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We Need Your Input On Our Disaster Relief Process!

<http://aacog.com/>



The Alamo Area Council of Governments (AACOG) has drafted a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling \$5,682,165 for the three disaster identified counties — Comal, Guadalupe and Karnes. AACOG created a MOD for a [Housing Buyout & Acquisition Program](#) and [Infrastructure Program](#). The summary MOD can be found [here](#).

AACOG will be taking public comments for the next 14 calendar days. A [public hearing](#) will take place on July 6, 2018, at 10:00 a.m. at the Seguin Event Center to take comments on the MOD. You may submit your comments to disaster_recovery@aacog.com.



MEMBERSHIP DIRECTORY
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Membership

The AACOG regional membership directory contains contact information for all AACOG members.

View information on [becoming an AACOG member](#). For more information, please contact Hernan Rozemberg, (210) 362-5203, or hrozemberg@aacog.com.

Want to learn more about Medicare Fraud?

Have you been searching for a way to give back to your community? Join us today and become a Senior Medicare Patrol Volunteer! We are looking for volunteers to help us educate Medicare beneficiaries in the Alamo Region.

For more information, contact: Teresa Banda
(210) 918-1281
[/ tbanda@aacog.com](mailto:tbanda@aacog.com)

Public Hearing Notice

Solicitation for Public Comment

Notice is hereby given that the Alamo Area Council of Governments (AACOG) is seeking input on the Method of Distribution (MOD) of \$4,152,165 for Housing (Local Buyout and Acquisition Program) and \$1,530,000 for Infrastructure in Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) Funds. The AACOG impacted counties as designated from federal disaster declaration (DR 4332 Hurricane Harvey) are Comal, Guadalupe, and Karnes County.

The draft MOD will be reviewed by the AACOG Board of Directors on June 27, 2018, at 10:00 am. The draft MOD will be posted on AACOG's website (www.aacog.com) on Wednesday, June 27, 2018, at 3:00 pm and will also be available at 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217.

Written and oral comments regarding this draft MOD will be taken at a **Public Hearing** scheduled for the following date, time and location:

Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Coliseum) located at 950 S. Austin Street, Seguin, Texas 78155.

Additional written comments must be received by AACOG no later than 5:00 p.m. on Thursday, July 12, 2018, to the attention of Stella Garcia, Sr. Director of Operations, 8700 Tesoro Drive, Suite 160, San Antonio, Texas 78217 or disaster_recovery@aacog.com.

AACOG will provide for reasonable accommodations for persons attending AACOG functions. Requests from persons needing special accommodations should be received by AACOG staff 72-hours prior to the function. The public meetings will be conducted in English and requests for language interpreters or other special communication needs should be made at least 72 hours prior to a function. Please call 210-362-5252 for assistance.

Stella Garcia

From: Mary Lozano <m.lozano@co.karnes.tx.us>
Sent: Wednesday, June 06, 2018 8:08 AM
To: Stella Garcia
Subject: FW: Karnes County Meetings

Fyi – also sent to Judge Long and other 2 commissioners under separate emails –Open meetings caution.

From: Mary Lozano [mailto:m.lozano@co.karnes.tx.us]
Sent: Wednesday, June 06, 2018 8:00 AM
To: 'revans@cityofkctx.com'; 'patronlott@att.net'; 'barbara@cityofkenedy.org'; 'mbhoudmann@yahoo.com'
Cc: 'robert.ebrom@co.karnes.tx.us'; 'dwayne.villanueva@co.karnes.tx.us'; 'shelby.dupnik@co.karnes.tx.us'
Subject: FW: Karnes County Meetings

Per previous discussions on funding opportunities with CDBG DR funds. Please share with other folks as you see fit.

Mary J. Lozano
KC Commissioner Pct. 3
210 W. Calvert, Ste. 160
Karnes City, Tx 78118
830 623 1344

From: Stella Garcia [mailto:sgarcia1@aacog.com]
Sent: Tuesday, June 05, 2018 5:18 PM
To: m.lozano (m.lozano@co.karnes.tx.us); shelby.dupnik@co.karnes.tx.us
Subject: Karnes County Meetings

Good afternoon Mary,

Here is the information to share with city/county officials and any other organization that has eminent domain authority with property in Karnes County.

Join us on Thursday, June 14, 2018, at 1:00 pm at County Jail Courtroom (500 E. Wall St., Karnes City, Tx). Stella Garcia with Alamo Area Council of Governments (AACOG) will be here to share information on Community Development Block Grant Disaster Recovery (CDBG DR) funds for Housing and Infrastructure associated with damage caused by Hurricane Harvey. The AACOG region has been allocated \$4.5 million in Housing (Acquisition and Buyout Program) and \$1.5 million in Infrastructure for the 3 counties in the federal disaster declaration which are Karnes, Comal, and Guadalupe. No match is required. AACOG is working with the General Land Office (GLO) and is required to develop a method of distribution (allocations) for the affected communities and have established criteria for us to do so.

Stella will provide information on not only these two programs but others in the state's Action Plan (<http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>) during this meeting. She will also share data provided by FEMA on individual assistance applications for Karnes County.

Stella will also share information related to the public participation plan which includes holding a Public Planning Meeting and Public Hearing associated with developing the method of distribution.

Here is the proposed schedule of events:

June 14, 2018: AACOG meets with city/county officials to give detailed information on the programs and next steps (closed meeting).

June 18, 2018: Public Planning Meeting at 10:00 am in County Courthouse Annex to seek feedback from the community, housing authorities and other interested stakeholders on method of distribution (MOD) factors to consider (such as FEMA applications, low moderate income population, repetitive flood claims).

June 27, 2018: AACOG Board of Directors review and approve draft method of distribution and release the MOD on website and forward to affected communities to post on their website/local offices for 14 day public comment period.

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July 13, 2018: AACOG submits MOD to General Land Office for review and approval

Once GLO approved the MOD, eligible entities (city, county, etc) will apply for funding from GLO.

We look forward to seeing you on Thursday, June 14th.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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Stella Garcia

From: Stella Garcia
Sent: Tuesday, June 12, 2018 2:13 PM
To: 'Robin Shellard'; 'meckmann@nbtexas.org'; 'acardiel@nbtexas.org'; 'gford@nbtexas.org'; 'kellej@co.comal.tx.us'; 'valadm@co.comal.tx.us'; 'contact2@co.comal.tx.us'; 'krause@co.comal.tx.us'; 'lgarcia@nbtexas.org'; 'Robin Shellard'; 'meckmann@nbtexas.org'; 'acardiel@nbtexas.org'; 'gford@nbtexas.org'; 'kellej@co.comal.tx.us'; 'valadm@co.comal.tx.us'; 'contact2@co.comal.tx.us'; 'krause@co.comal.tx.us'; 'lgarcia@nbtexas.org'
Cc: Hornseth, Tom; Hornseth, Tom
Subject: AACOG meeting with Comal/New Braunfels on CDBG DR/MOD

Thank you for meeting with me this morning. It was very helpful to me, and I hope I was able to provide relevant information to you.

The following links are resources that you might want to review:

General Land Office (GLO) action plan for the \$5 billion CDBG DR funds: <http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>

HUD Press Release on additional CDBG DR funds to come with a focus on mitigation: https://www.hud.gov/press/press_releases_media_advisories/hud_no_18_028

New release for 2016 Disaster Funds (Bandera County included) <http://texasrebuilds.org/Pages/2016Floods.aspx> I'm sharing this one so you can have an idea what to expect when the 2015 flood funds and additional Harvey funds are released.

I'll also be sending questions to the GLO staff regarding the items you raised in our meeting this morning. I'll keep you posted of what I learn.

Please do not hesitate to contact me if you have any questions/concerns on this or any other AACOG matter.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



Stella Garcia

From: Stella Garcia
Sent: Wednesday, June 13, 2018 4:25 PM
To: 'Mary Lozano'; 'revans@cityofkctx.com'; 'patronlott@att.net';
'barbara@cityofkenedy.org'; 'mbhoudmann@yahoo.com';
'robert.ebrom@co.karnes.tx.us'; 'dwayne.villanueva@co.karnes.tx.us';
shelby.dupnik@co.karnes.tx.us
Subject: RE: Karnes County Meetings
Attachments: Public Hearing Notice_AACOG.pdf; Public Hearing Notice_AACOG.docx - SPANISH.pdf

Good afternoon!

I look forward to meeting you all tomorrow afternoon. I hope you and/or your designee is able to attend the meeting.

I've also attached the Public Notice that should have been in today's area newspapers. I have included an English and Spanish version. Please share/post accordingly.

Thank you. See you tomorrow.

Stella

From: Mary Lozano [<mailto:m.lozano@co.karnes.tx.us>]
Sent: Wednesday, June 06, 2018 8:00 AM
To: 'revans@cityofkctx.com'; 'patronlott@att.net'; 'barbara@cityofkenedy.org'; 'mbhoudmann@yahoo.com'
Cc: 'robert.ebrom@co.karnes.tx.us'; 'dwayne.villanueva@co.karnes.tx.us'; 'shelby.dupnik@co.karnes.tx.us'
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Mary J. Lozano
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We look forward to seeing you on Thursday, June 14th.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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Stella Garcia

From: Barbara Shaw <barbara@cityofkenedy.org>
Sent: Tuesday, June 19, 2018 10:54 AM
To: Stella Garcia
Cc: patronlott@att.net
Subject: GLO/AACOG
Attachments: GLO for Mayor Lott.pdf

Importance: High

Dr. Garcia:

Please be advised that Kenedy desires to participate in the GLO/AACOG grant funding. It appears that infrastructure would be most beneficial to us.

I am cc'ing Mayor Lott from Runge, he is my sister city. He was not able to attend yesterday; however, I am sure that he is interested in grants for his city as well. He asked me to relay the information to him. I'm attaching the GLO information you handed out.

Please keep us in the loop of what we need to do next to secure our funds.

Thanks,

Barbara Najvar Shaw, M.S.
830-583-2230
830-583-2063 Fax
barbara@cityofkenedy.org

Stella Garcia

From: Jonathan Stinson <jstinson@gbra.org>
Sent: Monday, July 02, 2018 10:26 AM
To: Stella Garcia; Darrell Nichols
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella:
Yes, we would appreciate being included when y'all discuss regional planning associated with flood hazard mitigation.

Thanks again.

Jonathan Stinson
Deputy General Manager
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, Texas 78155
830-379-5822 – office
jstinson@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>
Sent: Friday, June 29, 2018 3:32 PM
To: Jonathan Stinson <jstinson@gbra.org>; Darrell Nichols <dnichols@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Jonathan,

Thanks for the information. This is helpful. I don't anticipate we will need any additional information from you related to the Method of Distribution we are finalizing.

On another note, I anticipate we will be involved in regional planning associated with hazard mitigation in flood prone communities based on funding we expect in the future. May we call on you when we begin these discussions?

Stella

From: Jonathan Stinson [<mailto:jstinson@gbra.org>]
Sent: Thursday, June 28, 2018 4:15 PM
To: Stella Garcia <sgarcia1@aacog.com>; Darrell Nichols <dnichols@gbra.org>
Cc: Kevin Patteson <kpatteson@gbra.org>
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella:

Thanks for the information, I apologize for my delay in responding. I'm not certain that GBRA has any projects that would qualify for these CDBG funds. As an entity, GBRA did not receive any damage to our facilities or infrastructure in Comal or Guadalupe counties related to Harvey. Additionally, GBRA is not a participating entity in NFIP or SRL where we acquire properties described for this program. For properties along the Guadalupe river in these counties I believe the

cities of New Braunfels and Seguin, along with the counties, have conducted the buy-outs and raising of properties above the 100 yr floodplain.

Please let me know if this addresses GBRA's ability, or limitation, on participation or if you need additional info.

Thanks for reaching out and making us aware.

Jonathan Stinson

Deputy General Manager

Guadalupe-Blanco River Authority

933 East Court Street

Seguin, Texas 78155

830-379-5822 – office

jstinson@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>

Sent: Thursday, June 21, 2018 3:15 PM

To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>

Cc: Kevin Patteson <kpatteson@gbra.org>

Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

This is the presentation I conducted at a public planning meeting in Karnes County this past Monday.

As stated below, there is \$4.1 million for buyout and acquisition program in the Harvey impacted counties (in the AACOG region). Comal, Karnes, and Guadalupe County had over 500 households that applied for federal aid after Harvey. Not all were awarded funds but what it tells me is that people indicated Harvey damaged their homes. For homes damaged or exacerbated by Harvey, HUD has allocated CDBG DR funds to GLO to allocate to eligible entities to buyout or acquire homes. For buyout, the homes are purchased at pre-event fair market value and demolished. The site becomes greenspace and off the tax rolls in perpetuity. Funding should also be made available for down payment or relocation assistance. For acquisition, the homes are purchased at post event fair market value and demolished. You can rebuild upon the site but obviously with proper safeguards to protect the homes. Few of the communities I have spoken to feel that they want to exercise either option. But if they did, it would be through a voluntary program, meaning they would let the homeowners know that they would buy them out (or through acquisition) and let the homeowner decide. But it would be entirely up to the eligible entity.

An eligible entity is a unit of local government and entities with the power of eminent domain authority. The caveat is that the use of the funds has to meet the HUD National Objectives of low moderate income (LMI) with at least 70% of the allocated funds.

I'm happy to have a conversation with Jonathan. I'll try him later today. We are taking a draft Method of Distribution to our Board of Directors on Wednesday, June 27th.

Stella

From: Darrell Nichols [<mailto:dnichols@gbra.org>]

Sent: Thursday, June 21, 2018 1:45 PM

To: Stella Garcia <sgarcia1@aacog.com>; Jonathan Stinson <jstinson@gbra.org>

Cc: Kevin Patteson <kpatteson@gbra.org>

Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella,

Thank you for the information. My initial thought is that GBRA would like to be considered as an eligible entity but I would like more information on what it means for GBRA to be an eligible entity. I would also be interested in any information you might have on the type of projects/buy-outs or locations that AACOG may be focusing its recommendation for distribution of any funds.

I will be out of the office until July 2nd but you can also reach Jonathan Stinson at 830-379-5822.

Darrell Nichols

Senior Deputy General Manager
Guadalupe-Blanco River Authority

933 East Court Street

Seguin, Texas 78155

830-379-5822 – office

512-917-6065 – cell

dnichols@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>

Sent: Wednesday, June 20, 2018 2:04 PM

To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>

Subject: Buyout and Acquisition Program--CDBG DR Funds

Good afternoon,

I just left a message on Mr. Nichols phone regarding a Method of Distribution (MOD) Alamo Area Council of Governments (AACOG) is developing at the request of the General Land Office as stated in their Action Plan to HUD (<http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>). Anyhow, the COGs are developing MODs for the Housing Buyout and Acquisition Program and Infrastructure Program. The Housing Program is for entities with eminent domain authority. I have spoken to Comal, Guadalupe, and Karnes County (listed in Federal Disaster Declaration associated with Hurricane Harvey) representatives as well as the larger cities in those counties to inform them of this option. It was suggested that I contact your agency as well to see if you all may want to be considered as an eligible entity for the Buyout and Acquisition program. There is \$4,152,165 allocated to the AACOG region for this program. AACOG is developing the method to distribute or allocate these funds to eligible entities. The minimum allocation we can make according to GLO's Action Plan is \$1,000,000; therefore, only up to 4 entities will be included in our drafted MOD. A draft MOD will be brought to the AACOG board of directors on June 27th and then posted for a 14 day public comment period. We will have a Public Hearing in Seguin on Friday, July 6th at 10:00 am (see attached Public Notice).

I'm happy to have a conversation with you or your designee(s) on what this may mean to your agency. Please do not hesitate to contact me via either phone number listed below (in my signature block) or via reply to this email.

I look forward to hearing from you.

Stella

Stella E. Garcia, PhD

Senior Director of Operations

Alamo Area Council of Governments

8700 Tesoro Drive, Suite 160

San Antonio, Texas 78217-6221

(210) 362-5252 direct
(210) 428-0347 cell



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Stella Garcia

From: Darrell Nichols <dnichols@gbra.org>
Sent: Thursday, June 21, 2018 1:45 PM
To: Stella Garcia; Jonathan Stinson
Cc: Kevin Patteson
Subject: RE: Buyout and Acquisition Program--CDBG DR Funds

Stella,

Thank you for the information. My initial thought is that GBRA would like to be considered as an eligible entity but I would like more information on what it means for GBRA to be an eligible entity. I would also be interested in any information you might have on the type of projects/buy-outs or locations that AACOG may be focusing its recommendation for distribution of any funds.

I will be out of the office until July 2nd but you can also reach Jonathan Stinson at 830-379-5822.

Darrell Nichols
Senior Deputy General Manager
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, Texas 78155
830-379-5822 – office
512-917-6065 – cell
dnichols@gbra.org

From: Stella Garcia <sgarcia1@aacog.com>
Sent: Wednesday, June 20, 2018 2:04 PM
To: Darrell Nichols <dnichols@gbra.org>; Jonathan Stinson <jstinson@gbra.org>
Subject: Buyout and Acquisition Program--CDBG DR Funds

Good afternoon,

I just left a message on Mr. Nichols phone regarding a Method of Distribution (MOD) Alamo Area Council of Governments (AACOG) is developing at the request of the General Land Office as stated in their Action Plan to HUD (<http://texasrebuilds.org/Documents/Action%20Plan%20-%205%20Billion%20Final%20Draft%205-8-2018.pdf>). Anyhow, the COGs are developing MODs for the Housing Buyout and Acquisition Program and Infrastructure Program. The Housing Program is for entities with eminent domain authority. I have spoken to Comal, Guadalupe, and Karnes County (listed in Federal Disaster Declaration associated with Hurricane Harvey) representatives as well as the larger cities in those counties to inform them of this option. It was suggested that I contact your agency as well to see if you all may want to be considered as an eligible entity for the Buyout and Acquisition program. There is \$4,152,165 allocated to the AACOG region for this program. AACOG is developing the method to distribute or allocate these funds to eligible entities. The minimum allocation we can make according to GLO's Action Plan is \$1,000,000; therefore, only up to 4 entities will be included in our drafted MOD. A draft MOD will be brought to the AACOG board of directors on June 27th and then posted for a 14 day public comment period. We will have a Public Hearing in Seguin on Friday, July 6th at 10:00 am (see attached Public Notice).

I'm happy to have a conversation with you or your designee(s) on what this may mean to your agency. Please do not hesitate to contact me via either phone number listed below (in my signature block) or via reply to this email.

I look forward to hearing from you.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



Celebrating 50 Years of Uniting the Region

Please take a moment to complete the [AACOG Customer Satisfaction Survey](#).

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Stella Garcia

From: Stella Garcia
Sent: Tuesday, July 03, 2018 11:25 AM
To: m.lozano (m.lozano@co.karnes.tx.us); shelby.dupnik@co.karnes.tx.us; 'revans@cityofkctx.com'; 'Barbara Shaw'; 'Robin Shellard'; 'meckmann@nbtexas.org'; 'acardiel@nbtexas.org'; 'gford@nbtexas.org'; 'kellej@co.comal.tx.us'; 'valadm@co.comal.tx.us'; 'contact2@co.comal.tx.us'; 'dfaseler@seguintexas.gov'; 'dlosey@seguintexas.gov'; 'wolverton@co.guadalupe.tx.us'; 'krause@co.comal.tx.us'; 'Patrick Pinder'; 'Trish Tumlinson'; 'city.of.runge@sbcglobal.net'; 'Homer Lott'
Cc: Claudia Mora; Alfredo Cervera
Subject: REMINDER Public Hearing--CDBG DR Funds--July 6th at 10:00 am in Seguin

Good morning!

Just a reminder that there will be a Public Hearing on the draft Method of Distribution (MOD) for the Housing Buyout and Acquisition Program (\$4,152,165) and the Local Infrastructure Program (\$1,530,000) on Friday, July 6, 2018, at 10:00 am at the Seguin Event Center (Seguin Coliseum) located at 950 S. Austin Street in Seguin, Texas.

The draft Method of Distribution (MOD) can be found on the AACOG website: <http://aacog.com/> Information can be found on lower left corner of our home page under "Public Comments". The AACOG Board of Directors reviewed and approved this draft on Wednesday, June 27th. Public Comments will be open until next Wednesday, July 13th. You may provide comment during the Public Hearing or email to disaster_recovery@aacog.com.

Thank you!

I look forward to seeing you there.

Have a happy and safe 4th of July!

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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Public Comments

Stella Garcia

From: Amelia Adams <amelia@texashousing.org>
Sent: Wednesday, July 11, 2018 5:35 PM
To: Disaster
Subject: Method of Distribution Question

Hi Ms. Garcia,

I was wondering where the data used in the BVCOG MOD comes from. Specifically, what is the source for the repeat disasters and damage reports?

Thanks!

Amelia

--
Amelia Clare Adams
Community Planner
Fair Housing and Disaster Recovery Analyst
Texas Housers
510.418.7480

Stella Garcia

From: Disaster
Sent: Friday, July 13, 2018 9:31 AM
To: 'Maddie Sloan'; Disaster
Cc: Brennan Griffin; Bridgette Guzman
Subject: RE: Comments on AACOG MOD

Thank you for your comments.

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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Please take a moment to complete the [AACOG Customer Satisfaction Survey](#).

From: Maddie Sloan [mailto:msloan@texasappleseed.net]
Sent: Thursday, July 12, 2018 2:57 PM
To: Disaster <disaster_recovery@aacog.com>
Cc: Brennan Griffin <bgriffin@texasappleseed.net>; Bridgette Guzman <bguzman@texasappleseed.net>
Subject: Comments on AACOG MOD

My apologies, I did not attach the comments to my original email.

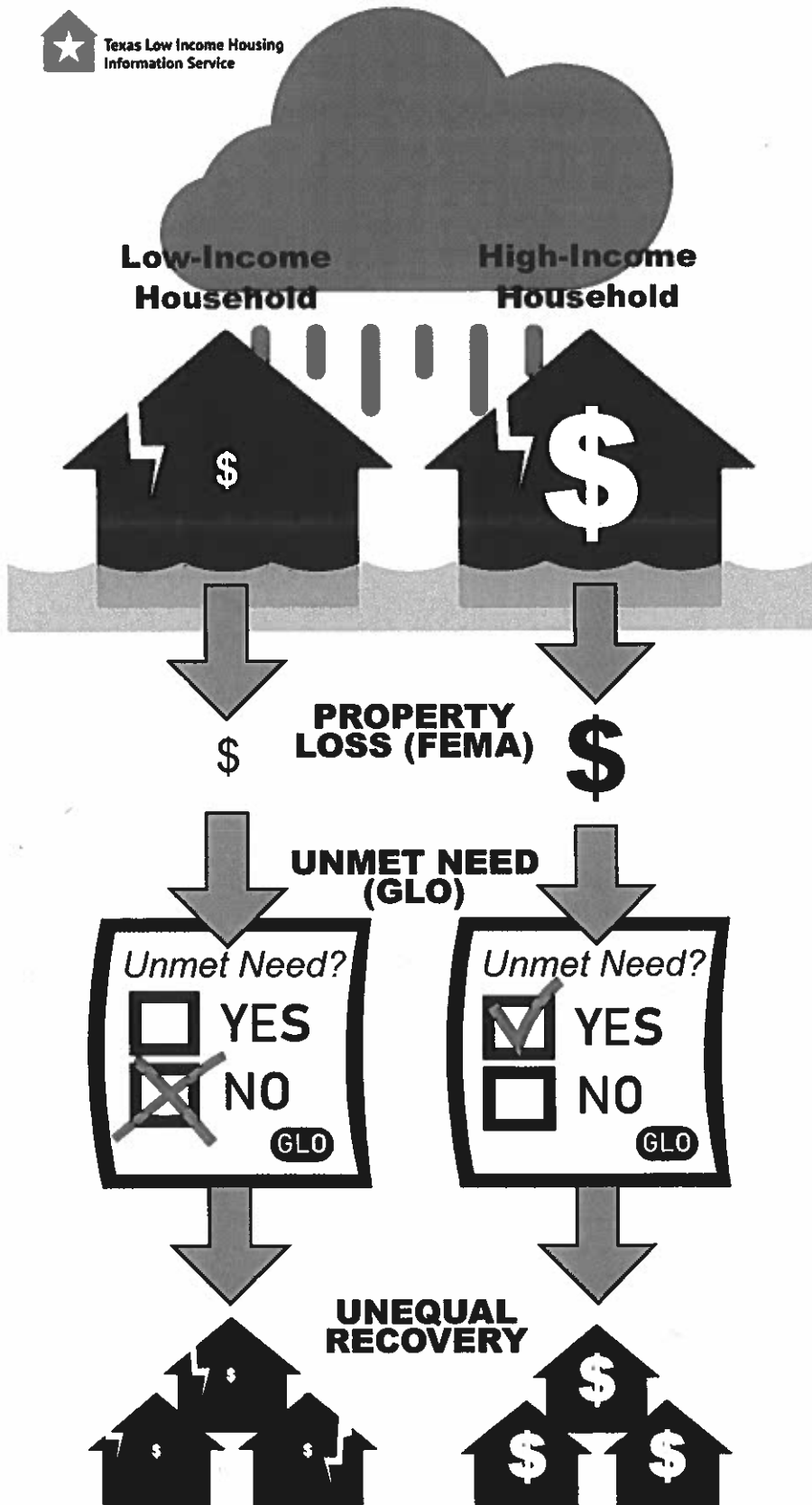
Thank you,
Maddie Sloan

--

M. Madison Sloan

Director, Disaster Recovery and Fair Housing Project

How Texas is Underestimating Unmet Need for Low-Income Families



Assessing "Unmet Need"

FEMA collects information on the disaster's impact on **PROPERTY**, not **PEOPLE**. Lower-income households have fewer financial resources to recover, but households with higher incomes generally have more property to lose.

When a disaster hits, homes may be impacted similarly, but when FEMA verifies their property loss (FVL), lower-income households have significantly lower average loss.

This already results in unequal distribution of assistance, but the problems are compounded in the long-term recovery phase. This is because the Texas General Land Office (GLO) is using this FEMA data to determine the unmet housing need in affected areas. This assessment determines where long-term recovery funding will go.

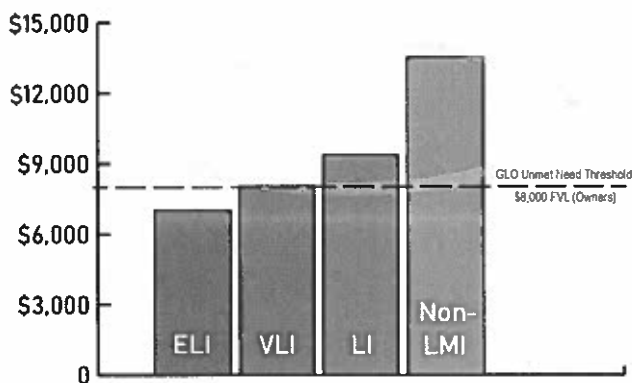
The GLO uses an arbitrary threshold of \$8,000 of FVL for owners and \$2,000 for renters when calculating the unmet need amount per household. This assumes that any loss under that amount can be taken care of without additional funds and is not considered "unmet need".

As a result, the property loss of many low-income households is not included in the unmet need calculation. This means the GLO does not consider this loss when allocating funding to different areas of the state. Areas with more low-income residents will see less funding than is really needed for their recovery.

How we can do BETTER!

How we define and count "Unmet Need" matters for disaster recovery. If we systematically fail to count low-income* households, we will systematically fail to fund them in the long-term recovery phase. Crucially, these households are much less likely to have the funds to recover on their own. Below is a comparison of the GLO's methodology and Texas Housers' proposed methodology.

GLO Methodology: A Standardized Threshold



Average FEMA-Verified Loss (FVL) by Income Category

A standardized threshold that doesn't take into account household income excludes most low-income households from the unmet need calculation. As a result...

69%

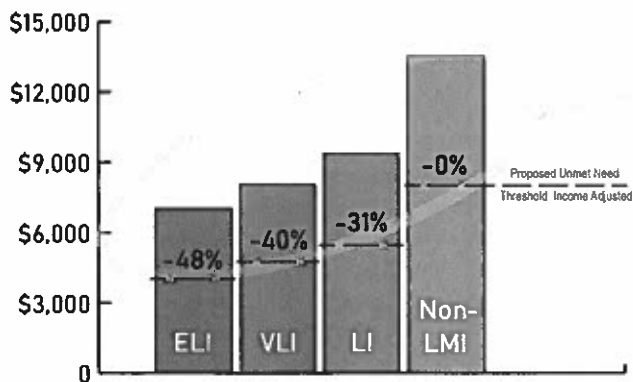
of ELI owners are excluded from the count

(compared to only 41% of non-LMI owners)



Proposed Methodology: An Income-Adjusted Threshold

For each income level, the \$8000 threshold for owners is reduced proportionately to the average FVL for each income group. For example, the average FVL for ELI owners is 48% lower than the average for Non-LMI households. Therefore, the \$8000 threshold is lowered 48%, as illustrated in the chart below.



Average FEMA-Verified Loss (FVL) by Income Category

An income-adjusted threshold allows the assessment to capture damage to low-income households! As a result...

an additional

49%

would be budgeted for ELI owners under this methodology.



* Income Category	Income
Extremely Low Income (ELI)	0-30% AMI
Very Low Income (VLI)	30-50% AMI
Low Income (LI)	50-80% AMI
Not Low or Median Income (Non-LMI)	80%+ AMI

Texas' Most Undercounted Zipcodes

The stakes are high when assessing the unmet housing need of disaster survivors. In some areas of Texas, especially those that are home to many low-income families, being undercounted could mean being passed over for the funds necessary to bring people back to safe, affordable and comfortable homes. Below are the most severely undercounted zip codes in the state of Texas.

Most Underfunded Renters

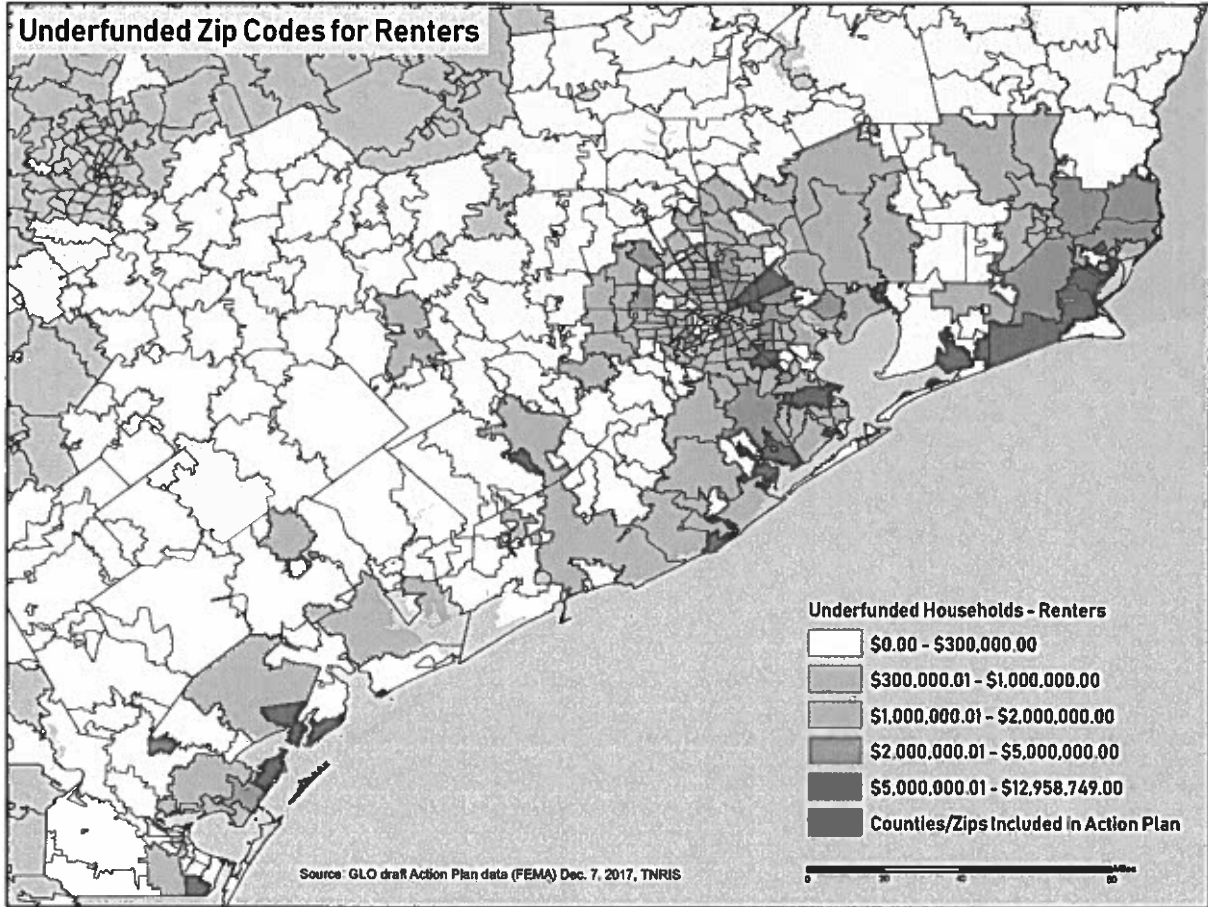
Rank	Zip Code	Area	Additional Unmet Need*
1	77642	Port Arthur	\$12,958,749
2	77026	Houston - Kashmere Gardens, Fifth Ward	\$9,381,477
3	77060	Houston - Greater Greenspoint	\$8,288,539
4	77078	East Houston, East Little York, uninc. Harris County	\$6,212,408
5	77539	Texas City, Dickinson, League City	\$6,161,407
6	77640	Port Arthur	\$5,868,615
7	77044	Lake Houston and unincorporated Harris County	\$5,830,581
8	78382	Rockport, Fulton, uninc. Aransas County	\$5,665,630
9	77013	Houston - Northshore, El Dorado/Oates Prairie	\$5,313,404
10	77028	Houston - Trinity, Kashmere Gardens, Settegast, East Houston	\$5,129,894
11	77089	Houston - Southbelt/Ellington and uninc. Harris County	\$5,008,949
12	77034	Houston - South Belt/Ellington, Edgebrook, Clear Lake	\$5,002,261
13	77084	Houston - Addicks Park Ten, uninc. Harris County	\$4,793,499
14	77096	Houston - Meyerland, Willow Meadows, Westbury, Brays Oaks	\$4,162,645
15	77016	Houston - East Little York/Homestead, Trinity/Houston Gardens	\$4,052,771
16	78336	Aransas Pass, Ingleside, uninc. Aransas and San Patricio County	\$3,862,106
17	77015	Houston - Northshore, Galena Park, uninc. Harris County	\$3,568,755
18	77630	Orange, West Orange, Pinehurst, uninc. Orange County (south)	\$3,455,848
19	77090	Houston - Greater Greenspoint, uninc. Harris County	\$3,410,527
20	77075	Houston - Greater Hobby, South Belt/Ellington	\$3,392,014
		TOTAL	\$111,520,079

Most Underfunded Owners

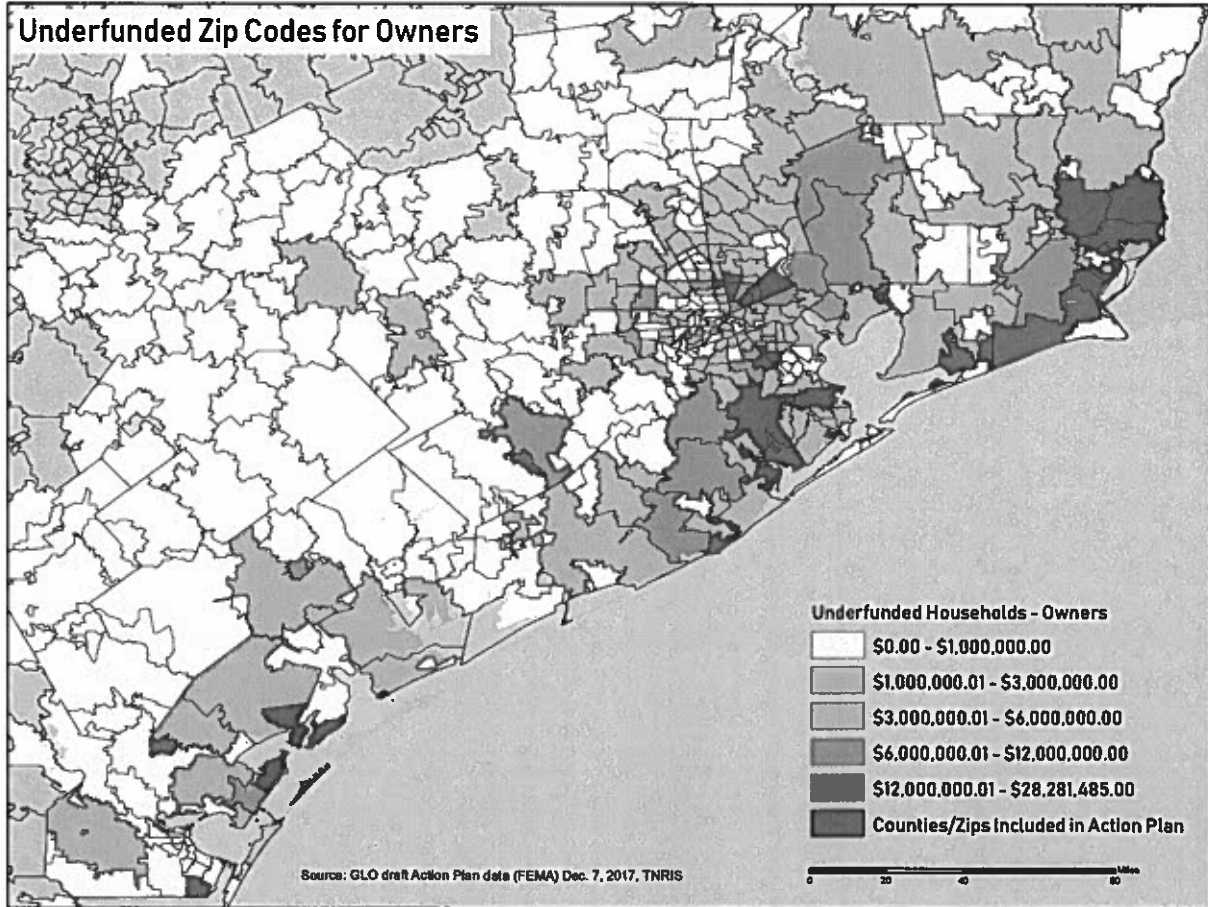
Rank	Zip Code	Area	Additional Unmet Need*
1	77642	Port Arthur	\$28,281,485
2	77044	Lake Houston and unincorporated Harris County	\$27,154,740
3	77539	Texas City, Dickinson, League City	\$21,640,536
4	77037	Houston - Greenspoint	\$21,325,458
5	77662	Vidor, Pine Forest, Rose City, uninc. Jefferson County	\$21,181,682
6	77640	Port Arthur	\$20,920,065
7	77028	Houston - East Houston, Trinity/Houston Gardens, Settagast, Kashmere Gardens	\$20,424,860
8	77089	Houston - Southbelt/Ellington and uninc. Harris County	\$18,824,792
9	77034	Houston - South Belt/Ellington, Edgebrook, Clear Lake	\$16,511,824
10	77039	Houston - Greater Greenspoint	\$15,487,093
11	78382	Rockport, Fulton, uninc. Aransas County	\$15,163,049
12	77630	Orange, West Orange, Pinehurst, uninc. Orange County (south)	\$14,570,598
13	77632	Orange, uninc. Orange County (north)	\$14,549,859
14	77078	East Houston, East Little York, uninc. Harris County	\$14,162,279
15	77511	Alvin, Hillcrest, League City, uninc. Brazoria and Galveston Counties	\$14,047,116
16	77093	Houston - Eastex-Jensen Area, uninc. Harris County	\$12,065,163
17	77587	South Houston (city)	\$11,007,245
18	77535	Dayton, Dayton Lakes, Kenefick, Liberty, Mont Belvieu, Old River-Winfree, uninc. Liberty County	\$10,838,771
19	77075	Houston - Greater Hobby, South Belt/Ellington	\$10,484,490
20	77084	Houston - Addicks Park Ten, uninc. Harris County	\$10,408,647
		TOTAL	\$339,049,752

*This is based not just on added LMI households, but also on already included households moving to a higher damage category.

Underfunded Zip Codes for Renters



Underfunded Zip Codes for Owners





July 12, 2018

Alamo Area Council of Governments
ATTN: Stella Garcia, Sr. Director of Operations
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217
Submitted via email to: disaster_recovery@aacog.com

Re: Texas Appleseed Comments on AACOG MOD for Disaster Recovery: Hurricane Harvey

Dear Ms. Garcia:

We appreciate the opportunity to provide comments on the AACOG Plan for Disaster Recovery: Hurricane Harvey, covering \$5,682,165 in Community Development Block Grant for Disaster Recovery (CDBG-DR) funds allocated by the U.S. Department of Housing and Urban Development (HUD) by Federal Register Notice, 83 F.R. 5844, February 9, 2018.

Texas Appleseed is a public interest justice center that works to change unjust laws and policies that prevent Texans from realizing their full potential. Since Hurricanes Katrina and Rita in 2005, Texas Appleseed has worked with a network of organizations in Texas, including housing advocates, policy experts, and grassroots community groups, to ensure that all Texas families are able to recover in the wake of a natural disaster, that communities are rebuilt to be more resilient, and that all families have the opportunity to live in safe, decent neighborhoods with equal access to educational and economic opportunity.

AACOG's MOD is not compliant with GLO requirements as it does not follow the MOD form provided by GLO and consists only of data and allocation tables, with no explanation on method of distribution. According to the "Councils of Government Method of Distribution Guidance" issued by GLO, allocation tables do not constitute a MOD. Additionally, with no MOD Summary form, the draft does not document:

- The Citizen Participation Plan and its implementation;
- An explanation of how the MOD fosters long term planning and recovery;

- An explanation of how unmet housing needs will be met; or,
- How AACOG will meet its LMI benefit and affirmatively furthering fair housing obligations.

Nor does the published draft include a certification that AACOG will certify that it is in compliance with its obligation to affirmatively further fair housing (AFFH) and will receive GLO training and technical assistance on AFFH.

In addition, the MOD does not provide any details about its local buyout and acquisition program, or its infrastructure program. Nor does the MOD indicate whether AACOG will limit or prioritize the types of projects allowed or the process and factors that were used to determine which subrecipient will receive funds under the MOD.

Therefore, AACOG has not published a MOD for public comment, and must publish a compliant document for 14 days of public comment according to its Citizen Participation Plan.

While AACOG has not yet published a draft MOD, we offer the following comments for the draft MOD:

A. Local Buyout and Acquisition Program:

Program guidelines for this program must be developed in a transparent process with extensive community input. Local communities must have a citizen participation process for drafting buyout guidelines. Regardless of whether these planned buyouts are voluntary or mandatory, relocating, away from an existing community or a home that has been in a family for generations, can be difficult and even traumatic. Without planning and community buy-in, a voluntary individual buyout program can result in a patchwork of empty and occupied homes, creating a blighted neighborhood. One of the critical issues in ensuring a successful buyout program is equity and ensuring that program rules and processes do not have a disparate impact on particular groups of homeowners. We strongly encourage We recommend that AACOG, in collaboration with local communities and residents, develop one buyout program with one set of guidelines that is then administered by local jurisdictions. **Local program guidelines must be identical, no family should have unequal access to disaster recovery simply because of where they live.**

Local buyout and acquisition programs must also prioritize LMI households in floodways and floodplains, who have the least resources with which to relocate on their own, leaving them a choice between housing instability and potential homelessness, or continuing to live in homes that may be structurally compromised or present health risks because of mold. It is particularly critical for LMI families that this buyout program includes not only acquisition and demolition, but relocation payments and other assistance and incentives as well. As the Federal Register Notice states, "a buyout program that merely pays homeowners to leave their existing homes does not result in a low- and moderate-income household

occupying a residential structure and, thus, cannot meet the requirements of the LMH national objective.” (83 FR 5863) Local buyout programs should include plans to build housing in safer areas.

Low- and moderate-income households must be provided with enough funds that the choice to move is a realistic one; to ensure that they can actually move to a safer area. The worst-case scenario is that families who accept a buyout are unable to find housing in safer areas and are forced to move back into their original or less safe neighborhoods.

The decision of whether to use pre- or post-storm home value is an important one. In particular, using the pre-storm value of a home to determine disaster recovery program benefit limits often has a discriminatory impact on the basis of race or ethnicity as well. Following Hurricane Katrina, the National Fair Housing Alliance (NFHA), the Greater New Orleans Fair Housing Action Center (GNOFAC), and African-American homeowners sued the State of Louisiana and the U.S. Department of Housing and Urban Development (HUD) alleging racial discrimination in the State’s CDBG-DR funded Road Home Program, which provided grants to homeowners to repair or rebuild their homes. The original grant formula was based on the pre-storm value of a home, which resulted in African-American homeowners receiving less repair money than White homeowners, because their homes were located in neighborhoods with lower home values based on market discrimination and the legacy of segregation. Many African-American families were left unable to complete repairs or return home or living in uninhabitable houses. As Louisiana Congressman Cedric Richmond said when the case was settled in 2011,

[e]veryone knew that the Road Home formula for calculating grant awards was deeply flawed and punished folks in neighborhoods where home values were lower. . . After all, if two families are both rebuilding a three bedroom home then their construction costs will be the same—regardless of the neighborhood. In that case, each family deserves the same assistance from their government. Unfortunately, the flawed formula was effectively discriminatory, locking many families out of equitable assistance.

AACOG’s and local program guidelines must ensure that buyout and acquisition programs are consistent regardless of whether the cost is funded by FEMA or CDBG-DR. CDBG-DR funding could be used to provide additional funds for LMI families in FEMA programs that would not provide them with enough funding to move, for example. AACOG should be particularly careful that they are not using a program that provides lesser benefits to serve communities and homeowners of color.

AACOG should also consider whether its allocation formula and threshold factors are effectively targeting the areas of highest risk, and not simply making sure every jurisdiction gets the minimum amount, regardless where damage is concentrated. The MOD should focus on ensuring that the highest risk communities are moved to safety, versus each jurisdiction buying out a handful of homes.

B. Local Infrastructure Program

Resilience is the ability to withstand and recover from disasters quickly, in a way that mitigates future damage and vulnerability, and in a way that goes beyond physical infrastructure. Low-income communities and communities of color are disproportionately affected by and have a harder time recovering from a disaster because of both geographic and social vulnerability forced on them by segregation, discrimination, and often the cumulative effects of previous disasters, on wealth and access to opportunity. For its Natural Disaster Resilience Competition (NDRC) HUD defined a resilient community as one which “is able to resist and rapidly recover from disasters or other shocks with minimal outside assistance,” and that plan and implement disaster recovery that mitigates future threats “while also improving quality of life for existing residents and making communities more resilient to economic stresses or other shocks.” Improving the quality of life for existing residents and making them more resilient to other shocks, including economic stress that can push middle and working class families into poverty following a disaster, is at the core of our concern for equity in disaster recovery.

Infrastructure programs must prioritize the needs of low- and middle-income households and communities, in particular, communities with substandard infrastructure as a result of discrimination and disinvestment. A key issue for many of these communities is environmental justice, as they were impacted not only by flooding but also by hazards related to chemicals, oils, sewage, waste or air pollution during the event. Neighborhoods that were doubly impacted by floodwaters polluted with chemicals, oils, waste, or sewage should be prioritized for mitigation as well.

Also key to economic recovery and future resilience is ensuring that the jobs generated by recovery projects and programs are filled by local workers and those who lost jobs because of Harvey to create real jobs and job training for community residents, and create additional opportunities for community businesses. An economic development program that provides loans to small business will not be successful unless that business has access to a workforce. Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u; 24 C.F.R 135) requires recipients of certain HUD financial assistance, including CDBG-DR, provide job training, employment, and contracting opportunities for low or very low income residents in connections with projects or activities in their neighborhoods to the greatest extent possible. Historically, Section 3 has not been vigorously enforced, and jurisdictions have completely failed to comply with its provisions. We urge AACOG to fully implement and enforce Section 3, including monitoring (for example, of whether contractors are genuinely Section 3 eligible), helping to set up a training and jobs pipeline, measuring success in terms of the number of hours worked by Section-3 eligible workers, clearly defining the geographic area from which residents should get preference as locally as possible, and imposing meaningful monetary penalties on contractors who do not meet their Section 3 goals. In

addition to Section 3, jurisdictions routinely impose requirements like local hiring and job production in exchange for government financial assistance or other benefits and we encourage AACOG and its subrecipients to do so.

Other options for increasing the number of jobs going to affected individuals and communities are ensuring that contractor qualifications include a commitment to local hiring and best value bidding processes that give more points to bidders who can comply with job quality and targeted hiring standards. CDBG-DR presents an opportunity to leverage housing and infrastructure funds into economic development funds as well.

C. Needs Assessment and Funding Allocation

We are concerned that the data and formula used to determine unmet need results in a distribution that does not accurately reflect the critical needs of low to moderate income populations. Using the methodology provided by HUD and GLO will not include the severity of damage suffered by low-income homeowners and will distort the geographic allocation of money based on that standard.

Using FEMA Verified Loss (FVL) of real property (owners) to determine unmet need at the State level found that 54% of affected homeowners had no unmet needs on the basis that their FVL was below the thresholds set for the FEMA damage categories. However, when this is broken down by income level, 69 percent of extremely low-income (ELI) owners were found to have no unmet needs. Conversely, only 41 percent of non-LMI owners were found to have no unmet needs. The conclusion, based on FEMA data, that families making less than 30% of Area Median Income (AMI), which, for example, is \$12,060 in the Beaumont-Port Arthur MSA and \$13,100 in the Corpus Christi MSA, have been better able to recover than families making more than double that amount is simply not credible. The inaccuracy of this calculation is borne out by a study conducted by the Episcopal Health Foundation and the Kaiser Family Foundation three months after Hurricane Harvey. The study found that lower-income families and Black and Latinx Texans were less likely to have homeowners', renters', or flood insurance, and that,

[n]early half (46%) say they or someone else in their household lost job-related income as a result of the storm, such as getting fewer hours at work (32%), losing a job entirely (12%) or losing income from a small business or unpaid missed days (32%). These income disruptions affected a greater share of Hispanic (65%) and Black (46%) residents compared to White residents (31%).

Lower- and even middle-income families are less likely to have the savings and access to credit that let them access safe housing (including more immediate repairs) and are more likely to be forced to relocate far from jobs and schools, to live in overcrowded housing or double up with family or friends, remain in unsafe housing, or become homeless.

2015 Pew Charitable Trust study found that less than half (45%) of American households have even one month's income in savings in case of an emergency. Lower income households are in an even more precarious situation, with only two weeks of savings. Those at the bottom of the income scale could only survive 9 days on their liquid assets. The study also indicates that even middle-income households could only scrape together about four months of income; it has been nearly 10 months since Hurricane Harvey.

Pew also looked at disparities in liquid savings among various racial and ethnic groups and found that,

[t]he typical white household has slightly more than one month's income in liquid savings, compared with just 12 days for the typical Hispanic household and only five days for the typical African-American household. In fact, a quarter of black households would have less than \$5 if they liquidated all of their financial assets, compared with \$199 and \$3,000 for the bottom 25 percent of Hispanic and white households, respectively.

In addition, median white wealth is twelve times median black wealth, a disparity that can be traced to the history of segregation and discrimination in the United States, from government redlining to current lending discrimination.

The primary purpose of the CDBG program is to benefit LMI populations, yet the HUD methodology the State, and therefore AACOG, is using has the clear, disproportionate effect on LMI populations of excluding them from the unmet needs assessment conclusions. This disproportionate effect is not only on low- and moderate-income Texans, but on Black and Latinx populations as well.

Using this methodology means that AACOG would budget for unmet housing needs with the expectation that most LMI households, who fall into lower level damage categories if they are represented at all, are not severely damaged and will not need their homes rebuilt. While the average FVL for non-LMI homeowners was about twice that of ELI owners, the average income for non-LMI owners is over 14 times that of ELI owners. This methodology underrepresents LMI housing needs by income level, particularly misrepresenting the level of unmet rental housing need for ELI families. AACOG's use of FVL damage categories to weight the geographic distribution of CDBG-DR funds, therefore, will end up allocating resources away from areas that need them the most, affecting not only those families, but those communities as a whole.

Texas Appleseed supports the use of a data-based formula to allocate federal disaster recovery funds. But that formula must be adjusted to account for deficiencies in FEMA and other data and ensure that the needs of all Texans affected by Hurricane Harvey are taken into account. We strongly recommend that AACOG use the methodology proposed by the Texas Low Income Housing Information

Service (Texas Housers) in its comments on the draft Action Plan - or a similar methodology - which relates a household's FVL to their income, thereby considering the level of impact on a household, acknowledging the loss valuation variations produced by the FEMA/HUD methodology, and more accurately counts households with unmet housing needs that are the least able to recover and most vulnerable to housing insecurity. This method also ensures that the geographic allocation of funding addresses the actual levels of unmet housing needs in each locality.

In conclusion, we appreciate AACOG's work on the action plan and disaster recovery, and we look forward to seeing your final MOD. Please let us know if we can provide further information or be helpful in any way.

Madison Sloan
Director, Disaster Recovery and Fair Housing Project
Texas Appleseed
msloan@texasappleseed.net
512-473-2800 ext. 108

Stella Garcia

From: Disaster
Sent: Friday, July 13, 2018 4:12 PM
To: 'Amelia Adams'
Subject: RE: Method of Distribution Question

For the Damage Reports for the Housing Buyout and Acquisition Program, we counted the number of FEMA Individual Assistance applications and Small Business Administration home loan applications from residents of Karnes, Comal, and Guadalupe County.

For Damage Reports for the Local Infrastructure Program, we counted the number of Public Assistance requests submitted by local governments from Comal, Guadalupe, and Karnes Counties.

For repeat disasters, we counted the number of times the county was included in a federal disaster declaration since 2015. We applied the same number for both the Housing and Infrastructure Program. Comal and Guadalupe have been included in 3 federal disaster declarations (including Hurricane Harvey since 2015). Karnes County was only included in 1. For any town/city in those counties, we used the same number for that county.

I hope that answers your question.

Stella

From: Amelia Adams [mailto:amelia@texashousing.org]
Sent: Friday, July 13, 2018 1:08 PM
To: Disaster <disaster_recovery@aacog.com>
Subject: Re: Method of Distribution Question

I'm sorry! I meant AACOG!

On Fri, Jul 13, 2018 at 8:43 AM, Disaster <disaster_recovery@aacog.com> wrote:

Sorry for the delay in my response. Are you asking about the BVCOG or AACOG MOD?

Stella

Stella E. Garcia, PhD

Senior Director of Operations

Alamo Area Council of Governments

8700 Tesoro Drive, Suite 160

San Antonio, Texas 78217-6221

(210) 362-5252 direct

(210) 428-0347 cell



Celebrating 50 Years of Uniting the Region

Please take a moment to complete the [AACOG Customer Satisfaction Survey](#).

From: Amelia Adams [mailto:amelia@texashousing.org]

Sent: Wednesday, July 11, 2018 5:35 PM

To: Disaster <disaster_recovery@aacog.com>

Subject: Method of Distribution Question

Hi Ms. Garcia,

I was wondering where the data used in the BVCOG MOD comes from. Specifically, what is the source for the repeat disasters and damage reports?

Thanks!

Amelia

--

Amelia Clare Adams

Community Planner

Fair Housing and Disaster Recovery Analyst

Texas Housers

510.418.7480

CONFIDENTIALITY NOTICE: If you have received this communication in error, please notify the sender by reply message and then delete this message from your files. This e-mail transmission and any attached documents may contain confidential information belonging to the sender, is legally privileged, and intended for use only by the intended recipient(s). If you are not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, copying or forwarding of this communication is strictly prohibited. Unauthorized interception of this message may be in violation of the Electronic Communications Privacy Act, 18 U.S.C. §2510 et seq.

--

Amelia Clare Adams

Community Planner

Fair Housing and Disaster Recovery Analyst

Texas Housers

510.418.7480

Outreach and Contacts

The Alamo Area Council of Governments is accepting nominations for the 2018 Regional Awards.

Any person, corporation, community project, or government regional project that has contributed to the significant positive advancement of the region and/or any communities in the thirteen counties of the Alamo Area (Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Kames, Kendall, Kerr, McMullen, Medina, and Wilson counties) is eligible for nomination. Current elected officials and public sector employees are ineligible for nomination, unless directly involved in a governmental regional project.

Nomination Categories:

- Regional Citizen of the Year
- Corporate/Business Steward of the Year
- Community/Non-profit Project of the Year
- Governmental Project of the Year
- Lifetime Achievement Award (Not Awarded Every Year)

You can view the form [here](#)
For more information contact Veronica Gallegos
(210)278-4312 / vgallegos@aacog.com



Membership

The AACOG regional membership directory contains contact information for all AACOG members. View information on [becoming an AACOG member](#). For more information, please contact Miguel Segura, (210) 362-5200, or msegura@aacog.com.

Hurricane Harvey Disaster Recovery Solicitation for Public Comment

AACOG has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling \$5,682,165 for the three disaster identified counties — Comal, Guadalupe, and Kames. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds to foster long-term recovery emphasize a focus on the permanent restoration in infrastructure, and to use local buyout and acquisition of land and property to remove Hurricane Harvey survivors out of harm's way.

A Public Planning Meeting was held in Karnes City on June 18, 2018, to solicit feedback on the development of the MOD, and a Public Hearing was held in Seguin on July 6, 2018 to solicit feedback on the MOD and allocations. The MOD can be found [here](#), and the allocations [here](#). AACOG has reopened the public comment for the next 14 calendar days, through Monday, September 10, 2018, at 5:00 pm. We encourage your review of the MOD and allocations. you may submit your comments to disaster_recovery@aacog.com.

Here is screen shot of the email I sent to the individuals on the attached distribution list. I sent via "bcc" to the individuals to avoid a reply all situation. This email is saved in my Disaster Recovery folder and will be available for any to review if audited/monitored.

The screenshot shows an Outlook email window titled "Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened - Message (HTML)". The interface includes a ribbon with "FILE" and "MESSAGE" tabs, and various action buttons like "Ignore", "Delete", "Reply", "Forward", "More", "Natural Resources", "To Manager", "Done", "Create New", "Move", "Actions", "Mark Unread", "Categorize", "Follow Up", "Translate", "Find", "Related", "Zoom", and "Select".

The email header shows it was sent on **Mon 8/27/2018 12:41 PM** from **Stella Garcia** with the subject **Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened**. The "To" field contains a long list of email addresses, including: Robin Sheffield, Kayla Kappelmann, HornePh, Tom, Kelly, Natural Resources, To Manager, Done, Create New, Move, Actions, Mark Unread, Categorize, Follow Up, Translate, Find, Related, Zoom, and Select.

The email body contains the following text:

Good afternoon stakeholders,

The Alamo Area Council of Governments (AACOG) has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling \$5,682,165 for the three disaster identified counties — Comal, Guadalupe, and Karnes. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds to foster long-term recovery, emphasize a focus on the permanent restoration in infrastructure, and to use local buyout and acquisition of land and property to remove Hurricane Harvey survivors out of harm's way.

A Public Planning Meeting was held in Karnes City on June 18, 2018, to solicit feedback on the development of the MOD, and a Public Hearing was held in Seguin on July 6, 2018, to solicit feedback on the MOD and allocations. The MOD and allocations are attached; they can also be found on our website: www.aacog.com.

AACOG has reopened the public comment for 14 calendar days (August 27, 2018 through September 10, 2018). You may submit your comments to disaster_recovery@aacog.com. Please also feel free to share this with other interested stakeholders by forwarding this email, posting to your website or social media, and/or posting at your place of business.

The AACOG Board of Directors is expected to review the MOD and consider public comments received during its monthly Board of Directors meeting scheduled for Wednesday, September 26, 2018.

Feel free to reach out to me if you would like to schedule some time to review this in more detail or just want more information about it.

Thank you!

Stella

Stella E. Garcia, PhD
Senior Director of Operations
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 160
San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell

The email footer includes the AACOG logo and a "Stella Garcia Follow up with oral surgeon" notification. The Windows taskbar at the bottom shows the time as 1:44 PM on 8/27/2018.

Stella Garcia

From: Stella Garcia
Sent: Tuesday, August 28, 2018 2:06 PM
To: 'kallen@hillcountry.org'; 'Janet.Brunette@bluebonnetmhmr.org';
'beckyy@caminorealcs.org'
Subject: FW: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened
Attachments: COG MOD Summary Form- 4-18-18_aacog_revision 1_August 6 2018.pdf;
HarveyMODAllocationSummary 4-19-18_aacog1_Revision 1_August 6 2018.xlsx

Good afternoon!

I wanted to be sure that your organizations were aware of a Method of Distribution that the Alamo Area Council of Governments (AACOG) has developed for Community Development Block Grant Disaster Recovery (CDBG DR) funds for housing and infrastructure. Please see email below. Feel free to call upon me if you would like more information about this.

Thank you!

Stella

From: Stella Garcia
Sent: Monday, August 27, 2018 12:41 PM
Subject: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened

Good afternoon stakeholders,

The Alamo Area Council of Governments (AACOG) has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling \$5,682,165 for the *three disaster identified counties* — **Comal**, **Guadalupe**, and **Karnes**. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds to foster long-term recovery, emphasize a focus on the permanent restoration in infrastructure, and to use local buyout and acquisition of land and property to remove Hurricane Harvey survivors out of harm's way.

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AACOG has reopened the public comment for 14 calendar days (August 27, 2018 through September 10, 2018). You may submit your comments to disaster_recovery@aacog.com. Please also feel free to share this with other interested stakeholders by forwarding this email, posting to your website or social media, and/or posting at your place of business.

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Feel free to reach out to me if you would like to schedule some time to review this in more detail or just want more information about it.

Thank you!

Stella

Stella E. Garcia, PhD
Senior Director of Operations
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San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



Celebrating 50 Years of Uniting the Region

Please take a moment to complete the [AACOG Customer Satisfaction Survey](#).

Stella Garcia

From: Stella Garcia
Sent: Tuesday, August 28, 2018 11:26 AM
To: 'sandra@myfairhousing.org'
Subject: FW: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened
Attachments: COG MOD Summary Form- 4-18-18_aacog_revision 1_August 6 2018.pdf;
HarveyMODAllocationSummary 4-19-18_aacog1_Revision 1_August 6 2018.xlsx

Good morning Ms. Tamez,

I wanted to be sure that your organization was aware of a Method of Distribution that the Alamo Area Council of Governments (AACOG) has developed for Community Development Block Grant Disaster Recovery (CDBG DR) funds for housing and infrastructure. Please see email below. Feel free to call upon me if you would like more information about this.

Thank you!

Stella

From: Stella Garcia
Sent: Monday, August 27, 2018 12:41 PM
Subject: Hurricane Harvey Method of Distribution (MOD) Public Comment Period Reopened

Good afternoon stakeholders,

The Alamo Area Council of Governments (AACOG) has developed a Method of Distribution (MOD) for the 2017 Hurricane Harvey Community Development Block Grant Disaster Recovery (CDBG DR) allocations totaling \$5,682,165 for the *three disaster identified counties* — **Comal**, **Guadalupe**, and **Karnes**. AACOG created a MOD for a Housing Buyout & Acquisition Program and Infrastructure Program. The MOD proposes how to distribute funds to foster long-term recovery, emphasize a focus on the permanent restoration in infrastructure, and to use local buyout and acquisition of land and property to remove Hurricane Harvey survivors out of harm's way.

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AACOG has reopened the public comment for 14 calendar days (August 27, 2018 through September 10, 2018). You may submit your comments to disaster_recovery@aacog.com. Please also feel free to share this with other interested stakeholders by forwarding this email, posting to your website or social media, and/or posting at your place of business.

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Senior Director of Operations
Alamo Area Council of Governments
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San Antonio, Texas 78217-6221
(210) 362-5252 direct
(210) 428-0347 cell



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CONTACT US

We want to hear from you! In order to better address your questions and comments, please choose from the following actions:

- **Career Opportunities and Internships:** View current openings and learn how you can apply today.
- **Community and Education Leadership Department:** For more information on any of the CELD programs, visit the program page for a link to send a message.
- **Development Department:** Send a message regarding donations and sponsorship opportunities.
- **MALDEF Regional Office:** Visit the regional office pages for contact information. To send a message, please use the form below.
- **Media Request:** If you are a member of the press, use the form to send any media related inquiries.

For all other inquiries, please fill out the information below to send us your questions and comments. We look forward to hearing from you! Thank you.

Your Information

Email*

Organization

First Name*

Last Name*

City

State

ZIP Code*

Phone

Mobile

*** Required Fields**

Your Message

Subject*

Message*



Contact Us

Thank you for contacting MALDEF. We appreciate your feedback on the work that we are doing. The account is checked daily, and your e-mail will be forwarded to the appropriate office and department at the organization.

If this is a press inquiry and you are on deadline, please contact Sandra Hernandez at (213) 629-2512.

Once again, thank you for contacting MALDEF and letting us know what is important to you as a member of our community.

AACOG Method of Distribution
Email Distribution List

Name	Title	Email address
City of New Braunfels		
Robin Shellard	Interim Grants Administrator/Finance	rshellard@nbtexas.org
Matthew Eckmann	Real Estate Manager	meckmann@nbtexas.org
Andrew Cardiel	Emergency Management Coordinator/Fire	acardiel@nbtexas.org
Garry Ford, P.E.	City Engineer	gford@nbtexas.org
Nancy Davison	CDBG Manager City of New Braunfels	ndavison@nbtexas.org
City of Seguin		
Don Faseler	Seguin City Manager	dfaseler@seguintexas.gov
Dana Losey	Seguin Grants Administrator	dlosey@seguintexas.gov
Kayla Kappelmann	Events Complex Coordinator	kkappelmann@seguintexas.gov
Comal County		
Brenda Ritzen	Environmental Health Coordinator	Contact2@co.comal.tx.us
Sherman Krause	Comal County Judge	krause@co.comal.tx.us
Kathy Griffin	Floodplain Coordinator	Contact2@co.comal.tx.us
Tom Hornseth, P.E.	County Engineer	rabthh@co.comal.tx.us
Jeff Kelley	Emergency Management Coordinator	kellej@co.comal.tx.us
Michelle Valadez	Grants Coordinator	valadm@co.comal.tx.us
Karnes County		
Mary Lozano	Karnes County Commissioner, Pct 3	m.lozano@co.karnes.tx.us
Walter Long	Karnes County Judge	walter.long@co.karnes.tx.us
Robert Ebroms	Karnes County Chief Deputy Sheriff	Robert.ebroms@co.karnes.tx.us
Dwayne Villanueva	Karnes County Sheriff	Dwayne.villanueva@co.karnes.tx.us
Shelby Dupnik	Karnes County Commissioner, Pct 1 and Emergency Management Coordinator	Shelby.dupnik@co.karnes.tx.us
	Karnes County	mbhoudmann@yahoo.com
City of Karnes City		
Bob Evans	Karnes City City Manager	revans@cityofkc.tx.com
City of Runge		
Homer Lott	Runge Mayor	patronlott@att.net
Esmeralda	Runge City Secretary	Cityofrunge@sbcglobal.net

AACOG Method of Distribution
Email Distribution List

City of Kenedy		
Barbara Shaw	Kenedy City Manager	barbarashaw@cityofkenedy.org
Guadalupe Blanco River Authority (GBRA)		
Darrell Nichols	Senior Deputy General Manager, Guadalupe-Blanco River Authority	dnichols@gbra.org
Jonathon Stinson	Deputy General Manager, GBRA	jstinson@gbra.org
Fair Housing Organizations/Organizations that Represent Protected Classes		
Sandra Tamez	Executive Director of Fair Housing Council of Greater San Antonio	sandra@myfairhousing.org
Bernardo Ramirez	National Association of Latino Community Asset Builders (NALCAB)	bramirez@nalcab.org
Oliver Hill	San Antonio Branch NAACP	sanaacp@satx.rr.com
Wanda Rosales	LULAC Council Number: 682 District: 2 Location: Seguin, TX 78155	wandarosales1955@gmail.com
Ann Zaragoza	Texas Rural Legal Aid	azaragoza@trla.org
Steven R. Sanchez	LULAC Council Number: 4217 District: 2 Location: New Braunfels, TX 78130	lulac4217@yahoo.com
MALDEF (Mexican American Legal Defense and Education Fund)	Called to get email address and did not get a return address; sent notice via web "contact us"	Sent via website (see print screens)
Housing Authorities		
Nadine Mardock	New Braunfels Housing Authority Comal County Housing Authority	nmardock@nbhatx.org
Brenda Edwards	Seguin Housing Authority	bedwards@seguinha.org
Mynette Benedict	Schertz Housing Authority	schertzha1@satx.rr.com

AACOG Method of Distribution
Email Distribution List

Cristi Lajeunesse	Kenedy Housing Authority	khatex@kenedyhousing.info
Mary Culpepper	Falls City Housing Authority	fcpha@sbcglobal.net
Pablo Nunez	Runge Housing Authority	rha@karnesec.net
Gilbert Piette	Prospera Housing and Community Services	patty@prosperahcs.org
Health and Human Services/Community Services Organizations		
Bobby Deike	Community Council of South Central Texas	bdeike@ccsct.org
Michael Weaver	Regional Director, Health and Human Services (Region 8)	michael.weaver@hhsc.state.tx.us
Esther Rodriguez	Program Manager (Region 8)	esther.rodriguez@hhsc.state.tx.us
Keely Lee	Texas Department of Health and Human Services	Keely.Lee@hhsc.state.tx.us
Economic/Community Development Organizations		
Josh Schneuker	Seguin EDC	jschneuker@seguintexas.gov
Christopher Looney	New Braunfels Planning and Community Development	clooney@nbtexas.org
Meagen Dennison	Texas Agrilife Extension Service	Karnes-tx@tamu.edu
Sherry Mosier	Bulverde Spring Branch EDF	sherry.mosier@bsbedf.com
Mark Luft	Cibolo EDC	mluft@cibolotx.gov
Chambers of Commerce		
Amelia Martinez	Karnes City Chamber of Commerce	karnescitychamber@att.net
Jolene Terwillinger	Kenedy Chamber of Commerce	kenedycc@outlook.com
Guadalupe County		
James Wolverson	Guadalupe County Commissioner	wolverson@co.guadalupe.tx.us
Trish Tumlinson	Guadalupe County Commissioners Court Administrator	trish.tumlinson@co.guadalupe.tx.us
Patrick Pinder	Fire Marshall/EMC Guadalupe County	patrick.pinder@co.guadalupe.tx.us
City of Santa Clara		
Jeff Hunt	Mayor of Santa Clara	mayor@cisantaclaratx.us
Area School Districts		

AACOG Method of Distribution
Email Distribution List

Andrew Kim	Comal ISD Superintendent	Andrew.kim@comalisd.org
Dr. Greg Gibson	Schertz-Cibolo- Universal City ISD	ggibson@scuc.txed.net
Ms. Kelly Walters	Marion ISD	kwalters@marionisd.net
Dr. Norman Hall	Richard Milburn Academy	nhall@rma-tx.org
MHMR/Local Mental Health Organizations		
Kent Allen	Director of Service Coordination Hill Country Community MHDD Centers (Comal)	kallen@hillcountry.org
Janet Brunette,	Director of DDR Essential Services (Guadalupe) Bluebonnet Trails Community Services	Janet.Brunette@bluebonnetmhmr.org
Becky Ynclan	Intellectual and Developmental Disabilities Director (Karnes) Camino Real Community Services	beckyy@caminorealcs.org
Entities/Individuals who Commented during first 14 Calendar Public Comment Period		
Madison (Maddie) Sloan	Director, Disaster Recovery and Fair Housing Project Texas Appleseed	msloan@texasappleseed.net
Amelia Adams	Community Planner, Fair Housing and Disaster Recovery Analyst Texas Housers	amelia@texashousing.org



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 cursive script that reads "Emily Martinez".

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 Zanoni

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*

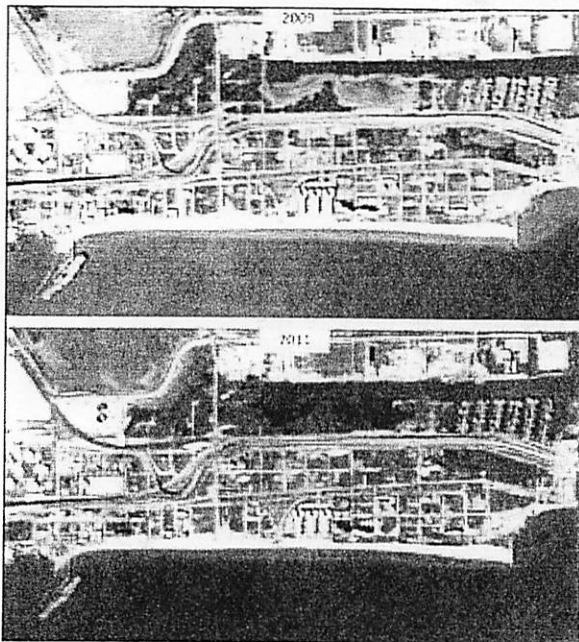
North Beach News

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

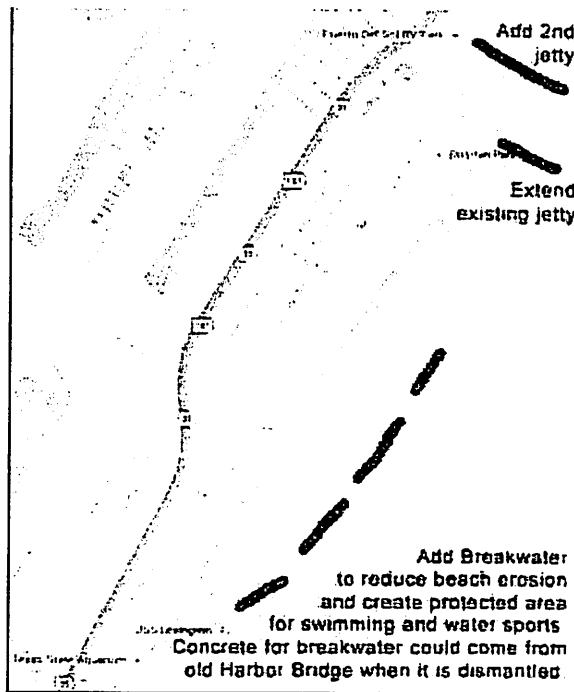
control measure, which is being discussed by North Beach residents and business owners, is the construction of a rocky breakwater running parallel to shore, similar to the one that protects the Corpus Christi Marina and the Bayfront. Although the initial costs would be much higher than just bringing 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

Newsletter of the North Beach Community Association

September 2014

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.

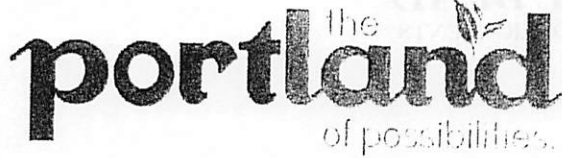
We are working closely with our Cities and Counties to ensure they are aware of these comments, and the benefits of leveraging shared resources to benefit the region. I'm available to meet with you at your convenience if you have any additional concerns.

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,

A handwritten signature in black ink that reads "Cathy Skurow". The signature is written in a cursive style.

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

NUECES COUNTY
WATER CONTROL AND IMPROVEMENT
DISTRICT #3

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.

Emily Martinez
Director of Regional Economic Development

I, Gilbert Gomez, the designated official of the City of Robstown:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.

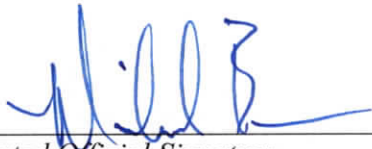

Designated Official Signature

08-10-2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Michael Barrera, the designated official of the City of Mathis:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

9/1/22

Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, John Benson, the designated official of City of Beeville:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

08/23/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Juan A. Cano, the designated official of the City of Gregory:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

8/10/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, GARY EDWARDS, the designated official of City of Aransas Pass:
Print Name

Acknowledge and accept funding through the Regional Mitigation Program.

Acknowledge and decline funding through the Regional Mitigation Program.

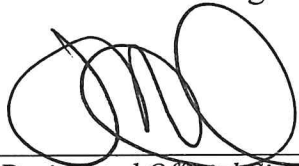

Designated Official Signature

8/11/22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, John Hobson, the designated official of City of Sinton:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

8-11-22

Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Brenton B Lewis the designated official of the City of Ingleside:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.

Brenton B Lewis
Designated Official Signature

8/30/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

RESOLUTION #2022- 45

A RESOLUTION ACCEPTING FUNDING FROM THE TEXAS GENERAL LAND OFFICE, REGIONAL MITIGATION PROGRAM FOR PROJECTS BENEFITING LOW TO MODERATE INCOME PERSONS; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Texas General Land Office (GLO) allocated \$179,547,000.00 to the Coastal Bend for Regional Mitigation Projects as part of the State of Texas CDBG Mitigation Action Plan as amended;

WHEREAS, the GLO contracted with Coastal Bend Council of Governments (CBCOG) to develop a method of distribution (MOD) for funds;

WHEREAS, the City of Kingsville is included as a potential recipient of funding in the amount of \$3,946,500.00, which is subject to change as the public participation process is completed and until final MOD approval by the GLO;

WHEREAS, due to CDBG-MIT grant requirements, the state is required to reach a certain threshold tied to benefitting low- and moderate- income (LMI) persons, therefore \$3,946,500.00 of the City's funding must be used for projects that benefit LMI persons in our community;

WHEREAS, the City needs to accept or decline the funds allocated through the MOD and return such notification to CBCOG by September 1, 2022;

WHEREAS, the City has a high level of LMI persons who could benefit from projects to be funded through this award;

NOW, THEREFORE BE IT RESOLVED by the City Commission of the City of Kingsville, Texas:

I.

THAT the City accepts the Texas General Land Office's Regional Mitigation Program Grant Award anticipated to be in an amount of \$3,946,500.00 for projects benefiting low to moderate income persons.

II.

THAT the Mayor and the City Manager are hereby designated as the Chief Executive Officers and Authorized Representatives to act in all matters in connection with this application and participation in the CDBG-MIT Grant Programs.

III.

THAT all resolutions or parts of resolutions in conflict with this resolution are repealed to the extent of such conflict only.

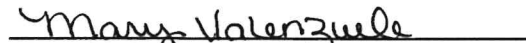
IV.

THAT this Resolution shall be and become effective on or after adoption.

PASSED AND APPROVED by a majority vote of the City Commission on the
22nd day of August, 2022.


Sam R. Fugate, Mayor

ATTEST:


Mary Valenzuela, City Secretary

APPROVED AS TO FORM:


Courtney Alvarez, City Attorney

I, Mark McLaughlin, the designated official of City of Kingsville:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

8/22/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, David Parsons, the designated official of the City of Port Aransas:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

8-29-2022

Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Randy L. Wright, the designated official of City of Portland:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

8/30/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Peter Zanoni, the designated official of the City of Corpus Christi:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

8.13.22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Robert Blaschke, the designated official of Refugio County:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.

Robert Blaschke
Designated Official Signature

August 23, 2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Barbara Canales, the designated official of Nueces County:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.

Bl CQ
Designated Official Signature

8-31-22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Barbara Canales, the designated official of Nueces County:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.

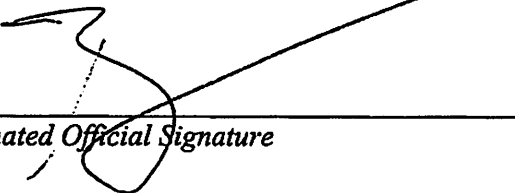
Bl CQ
Designated Official Signature

8.31.22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Rudy Madrid, the designated official of Kleberg County:
Print Name

Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

August 25, 2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Priscilla Vargas, the designated official of City of Premont:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.

Priscilla Vargas
Designated Official Signature

8/30/22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Wanda Dukes, the designated official of the Town of Refugio:
Print Name

Acknowledge and accept funding through the Regional Mitigation Program.
Acknowledge and decline funding through the Regional Mitigation Program.

Wanda Dukes
Designated Official Signature

08/10/22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, David Kiehs, the designated official of San Patricio County:
Print Name

Acknowledge and accept funding through the Regional Mitigation Program.
 Acknowledge and decline funding through the Regional Mitigation Program.

David Kiehs
Designated Official Signature

8-22-2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, C.H. Burt Mills, Jr , the designated official of Aransas County:

Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

08-11-2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, George P. "Trace" Morrill III , the designated official of Bee County:

Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature - Bee County Judge

September 1, 2022

Date

Return to:

Coastal Bend Council of Governments

ATTN: Mary Afuso

mary@coastalbendcog.org

2910 Leopard St

Corpus Christi, TX 78408

18



COUNTY OF JIM WELLS

STATE OF TEXAS

Juan Rodriguez, Jr.
County Judge

Ph: 361 668-5706
Fax: 361 668-8671
Cell: 361 219-3939

I Juan Rodriguez, Jr., the designated official of Jim Wells County:

Acknowledge and accept funding through the Regional Mitigation Program.




Designated Official Signature

August 29th 2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog. or2
2910 Leopard St
Corpus Christi, TX 78408

I, Michael Esparza, the designated official of City of Alice:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature


8-11-2022

Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Tim Jayroe, the designated official of City of Rockport:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.


Designated Official Signature

8/25/2022
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, RANDY POWELL, the designated official of City of Taft:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.

Randy Powell
Designated Official Signature

8.31.22
Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

I, Salvador Ochoa Jr., the designated official of the City of Bishop:
Print Name

- Acknowledge and accept funding through the Regional Mitigation Program.
- Acknowledge and decline funding through the Regional Mitigation Program.



Designated Official Signature

8/29/22

Date

Return to:
Coastal Bend Council of Governments
ATTN: Mary Afuso
mary@coastalbendcog.org
2910 Leopard St
Corpus Christi, TX 78408

COASTAL BEND COUNCIL OF GOVERNMENTS

RESOLUTION NO. 4028

A RESOLUTION TO ACCEPT THE CDBG-MIT ALLOCATION OF \$4,488,700.00 FOR A REGIONAL MITIGATION PROJECT IN PARTNERSHIP WITH THE PORT OF CORPUS CHRISTI

WHEREAS, CBCOG is an eligible recipient of the CDBG-MIT funding; and

WHEREAS, the Port of Corpus Christi is not an eligible entity to receive mitigation funding, yet has a direct need for a mitigation project; and

WHEREAS the funding 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;

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments accepts the allocation of \$4,488,700.00 and further approves a partnership with the Port of Corpus Christi to administer the funds for the project.

Duly adopted at a meeting of the Coastal Bend Council of Governments this 26th day of August, 2022

ATTEST:



John P. Buckner, Executive Director



Mayor Patrick Rios, Chairman

**COASTAL BEND COUNCIL OF GOVERNMENTS
RESOLUTION NO. 4031**

A RESOLUTION AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE AMEDEMMENT NO. 3 TO CONTRACT No. HHS00874100007 WITH THE HEALTH AND HUMAN SERVICES COMISSION (“Grantee or Contractor) WITH COASTAL BEND COUNCIL OF GOVERNMENTS AND COLLECTIVELY THE “PARTIES” TO HHSC CONTRACT EFFECTIVE OCTOBER 1, 2020 (THE “CONTRACT”). NOW WANT TO AMEND THEIR AGREEMENT FURTHER. THE CONTRACT IS AMENDED BY ADDING FUNDS THAT WILL BE USED TO SUPPORT SERVICES DELIVERY DURING FFY 2023, FFY 2024 AND FFY 2025. THE TOTAL CONTRACT AMOUNT SHALL INCREASE BY \$11,931,860.00 – FROM \$10,469,408 TO \$22,401,244.00

WHEREAS, the Parties have chosen to exercise their option to amend the contract in accordance with section 9.1 of Attachment E to the Contract.

WHEREAS the Parties desire to renew the Contract in accordance with Article III of the Contract, Duration, for three additional federal fiscal year (FFY) periods:

- a. October 1, 2022, through September 30, 2023 (“FFY2023”)
- b. October 1, 2023, through September 30, 2024 (“FFY2024”)
- c. October 1, 2024, through September 30, 2025 (“FFY 2025”)

WHEREAS the Parties desire to increase the Contract amount in accordance with Article IV of the Contract Signature Document to support services delivered during FFY 2023, FFY 2024, and FFY 2025.

WHEREAS The Parties desire to incorporate the approved indirect cost rate (“ICR”) letter into the Contract as Attachment K; and

WHEREAS the Parties desire to incorporate the Annual Federal Fiscal Year Funding Allocation Not to Exceed Amounts into the Contract as Attachment L. that the Parties agree as follows.

1. In accordance with Article III of the Contract Signature Document, Duration, the Contract is hereby amended to extend the termination date to September 30, 2025.
2. Article IV of the Contract Signature Document, Funding, Section (A) (relating to Total Contract Amount) is hereby amended by adding funds that will be used to support services delivered during FFY 2023, FFY 2024, and FFY 2025. The total Contract amount shall increase by \$11,931,836.00 – from \$10,469,408 to \$22,401,244.00.
 - a. The funding allocated for FFY is not to exceed the following amounts.

1) FFY 2023.....	\$4,307,584.00
2) FFY 2024.....	\$4,240,484.00
3) FFY 2025.....	\$3,383,768.00

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments concurs in the recommendation of its’ Advisory Council on Aging that authorizes its Executive Director to execute Amendment No. 3 to the contract with the Health and Human Services

Commission – Coastal Bend Council of Governments – Area Agency on Aging of the Coastal Bend.

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

Mayor Patrick Rios, Chairman

ATTEST:

John P. Buckner, Executive Director

**HEALTH AND HUMAN SERVICES COMMISSION
HHSC CONTRACT NO. HHS000874100007**

AMENDMENT NO. 3

The Health and Human Services Commission ("HHSC" or "System Agency") and Coastal Bend Council of Governments ("Grantec" or "Contractor"), each a "Party" and collectively the "Parties" to HHSC Contract No. HHS000874100007 effective October 1, 2020 (the "Contract"), now want to amend the Contract further.

Whereas, the Parties have chosen to exercise their option to amend the Contract in accordance with Section 9.1 of Attachment E to the Contract;

Whereas, the Parties desire to renew the Contract in accordance with Article III of the Contract. Duration, for three additional federal fiscal year (FFY) periods:

- a. October 1, 2022 through September 30, 2023 ("FFY 2023");
- b. October 1, 2023 through September 30, 2024 ("FFY 2024"); and
- c. October 1, 2024 through September 30, 2025 ("FFY 2025");

Whereas, the Parties desire to increase the Contract amount in accordance with Article IV of the Contract Signature Document to support services delivered during FFY 2023, FFY 2024, and FFY 2025:

Whereas, the Parties desire to incorporate the approved indirect cost rate ("ICR") letter into the Contract as Attachment K; and

Whereas, the Parties desire to incorporate the Annual Federal Fiscal Year Funding Allocation Not to Exceed Amounts into the Contract as Attachment L.

Now, therefore, the Parties agree as follows:

1. In accordance with Article III of the Contract Signature Document. Duration, the Contract is hereby amended to extend the termination date to September 30, 2025.
2. Article IV of the Contract Signature Document. Funding, Section (A) (relating to Total Contract Amount) is hereby amended by adding funds that will be used to support services delivered during FFY 2023, FFY 2024, and FFY 2025. The total Contract amount shall increase by \$11,931,836.00 – from \$10,469,408.00 to \$22,401,244.00.
 - a. The funding allocated for each FFY is not to exceed the following amounts:

1) FFY 2023	\$4,307,584.00
2) FFY 2024	\$4,240,484.00
3) FFY 2025	\$3,383,768.00
 - b. The annual not-to-exceed amount is comprised of the funding from the sources identified in Attachment L. Annual Federal Fiscal Year (FFY) Funding Allocation Not to Exceed Amounts.

- c. The FFY funding amounts are subject to increase or decrease as funds are appropriated throughout the contractual term from the federal government, Texas Legislature, or both. Throughout the term, Grantee will be notified of the availability of funds through a Notice of Funds Available (NFA).
 - d. Funds must be used for services as designated in the NFA and in accordance with the guidance provided by HHSC at the time each NFA is issued. All funds awarded are subject to the applicable match requirements. The funds shall not be available until the NFA is issued to the Grantee.
3. The Contract is hereby amended by the addition of Grantee's approved effective indirect cost rate ("ICR") letter, which is identified as Attachment K. Indirect Cost Rate Letter.
 4. The Contract is hereby amended by the addition of Attachment L. Annual Federal Fiscal Year (FFY) Funding Allocation Not to Exceed Amounts for FFY 2023, FFY 2024, and FFY 2025.
 5. This Amendment shall be effective on the date of the last signature below.
 6. Except as modified by this Amendment, all terms and conditions of the Contract shall remain in effect.
 7. Any further revision to the Contract shall be by written agreement of the Parties.

Signature Page to follow

Remainder of page intentionally left blank

SIGNATURE PAGE FOR AMENDMENT NO. 3

HHSC CONTRACT NO. HHS000874100007

HEALTH AND HUMAN SERVICES COMMISSION

COASTAL BEND COUNCIL OF GOVERNMENTS

By:

DocuSigned by:
Michelle Alletto
74D324454E77AEB

Signature of Authorized Representative

Printed Name: Michelle Alletto
Title: Chief Program and Services Officer

August 13, 2022

Date of Signature

By:

DocuSigned by:
John Buckner
E84CE151985044C

Signature of Authorized Representative

Printed Name: John Buckner
Title: Executive Director

August 11, 2022

Date of Signature

THE FOLLOWING DOCUMENTS ARE ATTACHED TO THIS AMENDMENT, AND THEIR TERMS ARE HEREBY INCORPORATED INTO THE CONTRACT BY REFERENCE:

- ATTACHMENT K.....Indirect Cost Rate Letter
- ATTACHMENT L.....Annual Federal Fiscal Year
(FFY) Not to Exceed Amounts

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ATTACHMENTS FOLLOW

ATTACHMENT L

ANNUAL FEDERAL FISCAL YEAR (FFY)
FUNDING ALLOCATION NOT TO EXCEED AMOUNTS

Grantee: Coastal Bend Council of Governments

1. FFY 2023; FFY 2024; and FFY 2025 Funding Allocation Not to Exceed Amounts

No.	Funding Source	FFY 2023	FFY 2024	FFY 2025
1	Older Americans Act Title III - B Supportive Services	\$606,042.00	\$606,345.00	\$606,648.00
2	Older Americans Act Title III - C1 Congregate Meals	\$530,110.00	\$530,375.00	\$530,640.00
3	Older Americans Act Title III - C2 Home-Delivered Meals	\$411,660.00	\$411,866.00	\$412,072.00
4	Older Americans Act Title III - D Preventive Health	\$45,190.00	\$45,213.00	\$45,236.00
5	Older Americans Act Title III - E Family Caregivers	\$271,872.00	\$272,008.00	\$272,144.00
6	Older Americans Act Title VII - Ombudsman	\$19,621.00	\$19,651.00	\$19,641.00
7	Older Americans Act Title VII - Elder Abuse Prevention	\$7,588.00	\$7,592.00	\$7,596.00
8	State General Revenue - (SGR)	\$135,270.00	\$135,338.00	\$135,406.00
9	State General Revenue (SGR) Home Delivered Meal Rate Increase	\$66,109.00	\$66,142.00	\$66,175.00
10	Health Information, Counseling and Advocacy Program (HICAP)	\$72,348.00	\$72,384.00	\$72,420.00
11	Medicare Improvements for Patients and Providers Act of 2008 - (MIPPA) Priority # 2	\$24,898.00	\$24,910.00	\$24,922.00

No.	Funding Source	FFY 2023	FFY 2024	FFY 2025
12	Older Americans Act Nutrition Services Incentive Program for the States (NSIP)	\$311,519.00	\$311,675.00	\$311,831.00
13	State General Revenue (SGR) Ombudsman Assistance Living Facility (ALF)	\$18,490.00	\$18,499.00	\$18,508.00
14	American Rescue Plan (ARP) for Supportive Services under Title III-B of the OAA	\$260,251.00	\$260,251.00	\$0.00
15	American Rescue Plan (ARP) for Congregate Meals under Title III-C1 of the OAA	\$174,036.00	\$174,036.00	\$0.00
16	American Rescue Plan (ARP) for Home Delivered Meals under Title III-C2 of the OAA	\$235,427.00	\$235,427.00	\$0.00
17	American Rescue Plan (ARP) for Preventive Health under Title III-D of the OAA	\$26,337.00	\$26,337.00	\$0.00
18	American Rescue Plan (ARP) for Family Caregivers under Title III-E of the OAA	\$70,620.00	\$70,620.00	\$0.00
19	American Rescue Plan (ARP) for Ombudsman Program under Title VII of the OAA	\$6,694.00	\$6,694.00	\$0.00
20	General Appropriations Act Local Government Code, §394.902 State General Revenue (SGR) Housing Bond	\$16,214.00	\$16,214.00	\$16,214.00
21	Expanding the Public Health Workforce within the Aging Network for States Award Authority	\$68,783.00	\$0.00	\$0.00
22	Older Americans Act Title III - B Supportive Services - Carryover	\$194,533.00	\$194,630.00	\$194,727.00
23	Older Americans Act Title III - C1 Congregate Meals - Carryover	\$192,113.00	\$192,209.00	\$192,305.00

No.	Funding Source	FFY 2023	FFY 2024	FFY 2025
24	Older Americans Act Title III - C2 Home-Delivered Meals - Carryover	\$116,382.00	\$116,440.00	\$116,498.00
25	Older Americans Act Title III - D Preventive Health - Carryover	\$21,539.00	\$21,550.00	\$21,561.00
26	Older Americans Act Title III - E Family Caregivers - Carryover	\$65,072.00	\$65,105.00	\$65,138.00
27	Older Americans Act Title VII – Ombudsman – Carryover	\$0.00	\$0.00	\$0.00
28	Older Americans Act Title VII - Elder Abuse Prevention - Carryover	\$0.00	\$0.00	\$0.00
29	Older Americans Act Nutrition Services Incentive Program for the States (NSIP) – Carryover	\$0.00	\$0.00	\$0.00
30	Older Americans Act Title III - B Supportive Services -Administration	\$68,566.00	\$68,600.00	\$68,600.00
31	Older Americans Act Title III - C1 Congregate Meals - Administration	\$85,700.00	\$85,743.00	\$85,786.00
32	Older Americans Act Title III - C2 Home Delivered Meals – Administration	\$44,904.00	\$44,926.00	\$44,948.00
33	Older Americans Act Title III - E Family Caregivers	\$29,599.00	\$29,614.00	\$29,629.00
34	American Rescue Plan (ARP) for Supportive Services under Title III-B of the OAA	\$30,449.00	\$30,449.00	\$0.00
35	American Rescue Plan (ARP) for Supportive Services under Title III-C1 of the OAA	\$18,430.00	\$18,430.00	\$0.00
36	American Rescue Plan (ARP) for Supportive Services under Title III-C2 of the OAA	\$27,644.00	\$27,644.00	\$0.00

No.	Funding Source	FFY 2023	FFY 2024	FFY 2025
37	American Rescue Plan (ARP) for Supportive Services under Title III-E of the OAA	\$8,477.00	\$8,477.00	\$0.00
38	Central Administration Title III B	\$5,020.00	\$5,023.00	\$5,026.00
39	Central Administration Title III C1	\$5,020.00	\$5,023.00	\$5,026.00
40	Central Administration Title III C2	\$12,548.00	\$12,554.00	\$12,560.00
41	Central Administration Title III E	\$2,509.00	\$2,510.00	\$2,511.00
	FYY Totals	\$4,307,584.00	\$4,240,484.00	\$3,383,768.00

1.1 The Grantee may only expend funds up to the amount on the Notice of Funds Available (NFA) per each funding source. The funding above is not available until an NFA is issued by HHSC.

COASTAL BEND COUNCIL OF GOVERNMENTS
RESOLUTION NO. 4032

A RESOLUTION AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE A NEW CONTRACT AGREEMENT FOR FY2022-2023 WITH HEALTH CARE UNLIMITED TO PROVIDE SUPPORT SERVICES FOR RESPITE IN-HOME AND PERSONAL ASSISTANCE AS A NEW VENDOR THAT WILL BE A PART OF THE AREA AGENCY ON AGING'S VENDOR PURCHASE POOL FOR THE PROVISION OF SUPPORTIVE SERVICES FOR TARGETED OLDER PERSONS IN THE ELEVEN COUNTY COASTAL BEND AREA BEGINNING SEPTEMBER 1, 2022- SEPTEMBER 31, 2023.

WHEREAS, the strategies relating to the provision of in-home and personal assistance supportive services (totaling approximately \$88,079 of Title III B Supportive Services funds,\$55,000 in PY Title III-B funds \$ 58,500 in Title III E Family Caregiver's Support Program funds, \$ 17,541 in State General Revenue funds, \$8,000 in III-E Match, \$5,000 in PY III E funds and program income of \$1,314 total \$233,434)through a vendor's direct purchase pool are part of the approved Area Agency on Aging's Action Plan for Fiscal Years 2022 - 2023; and

WHEREAS, the Area Agency on Aging solicited applications for membership in a vendor's purchase pool with contracts ending in FY 2023 for the purpose of purchasing in-home and other supportive services for targeted elderly persons in an eleven-county area; and

WHEREAS, these agreements enable the Area Agency on Aging to purchase needed services on a client-by-client basis, including personal assistance, respite in-home, respite out of home, respite out of home-overnight, respite voucher, adult day care, health maintenance residential repair and other supportive services as outlined in the attached Vendor Purchase Pool Summary; and

WHEREAS, on September 12, 2022 the Advisory Council on Aging reviewed the vendor contract as described and recommends approval by the Coastal Bend Council of Governments.

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments concurs in the recommendation of its Advisory Council on Aging that authorizes its Executive Director signed contract Agreements with the Health Care Unlimited, Inc. to provide supportive services, vendor will become part of the Area Agency on Aging's vendor purchase pool for the provision of various supportive services for targeted older persons in the eleven county Coastal Bend Area effective September 01, 2022.

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

Mayor Patrick Rios, Chairman

ATTEST:

John P. Buckner, Executive Director



COASTAL BEND
COUNCIL OF GOVERNMENTS

**AREA AGENCY ON AGING OF THE COASTAL BEND
CONTRACTOR AGREEMENT
FFY2022-FFY2023**

Health Care Unlimited, Inc., hereinafter referred to as Contractor, and Coastal Bend Council of Governments - Area Agency on Aging of the Coastal Bend (AAA-CB), hereinafter referred to as AAA-CB, do hereby agree to provide services effective beginning August 28, 2022 and ending September 30, 2023, in accordance with the Older Americans Act of 1965 (OAA), as amended, regulations of the Texas Department of Health and Human Services Commission (HHSC), the AAA Direct Purchase of Services Program and the stated Scope of Services.

The AAA Direct Purchase of Services Program is designed to promote the development of a comprehensive and coordinated service delivery system to meet the needs of older individuals (60 years of age or older) and their caregivers. Through the AAA-CB'S Coastal Bend Aging and Resource Center, services are provided to persons of all ages with disabilities and their caregivers. This agreement provides a mechanism for the creation of an individualized network of community resources accessible to a program participant in compliance with the OAA and HHSC's AAA Access and Assistance Guidelines.

The purpose of the system of Access and Assistance is to develop cooperative working relationships with service providers to build an integrated service delivery system that ensures broad access to and information about community services, maximizes the use of existing resources, avoids duplication of effort, identifies gaps in services, and facilitates the ability of people who need services to easily find the most appropriate provider.

Now and therefore, for and in consideration of the mutual promises and benefits stated herein, the parties now agree as follows:

I. SCOPE OF SERVICES

- A. The Contractor agrees to provide the following service(s) as identified below to program participants authorized by the AAA-CB staff, in accordance with the completed Contractor application, all required assurances, licenses, certifications and rate setting documents, as applicable.

Service: Respite - In Home

Service Definition: Temporary services provided to an eligible dependent care recipient for the relief of a caregiver. Services are provided in the eligible caregiver's home or the home of the care recipient on a short term, temporary basis while the primary caregiver is unavailable or needs relief.

In addition to supervision, services may include meal preparation, housekeeping, assistance with personal care and social and recreational activities.

An eligible Care Recipient must:

- be unable to perform a minimum of two activities of daily living identified through the consumer needs evaluation (CNE); or
- require substantial supervision due to a cognitive or other mental impairment which causes them to behave in a manner that poses a serious health or safety hazard to themselves or to another person.

A CNE is required. (AAAPPM Section D-1040)

An eligible Care Recipient must:

- be unable to perform a minimum of two activities of daily living identified through the consumer needs evaluation (CNE); or
- require substantial supervision due to a cognitive or other mental impairment which causes them to behave in a manner that poses a serious health or safety hazard to themselves or to another individual.

Unit of Service: Hours. Partial hour may be reported to two decimal places, e.g. 0.25 hours

Service Area: See Application

Service: Personal Assistance

Service Definition: Services to assist an older person who has difficulty performing a minimum of two activities of daily living as identified in the assessment process, with tasks a person would typically perform if they were able. This includes assistance in all activities of daily living.

A CNE is required. (AAAPPM Section D-1040)

Unit of Service: Hours. Partial hour may be reported to two decimal places, e.g. 0.25 hours. Does not include travel time, unless it is directly related to the older person's care plan.

Service Area: See Application

Service: Residential Repair

Service Definition: Services consisting of repairs or modifications of a dwelling occupied by an older person that are essential for the health and safety of the older person.

Unit of Service: One unduplicated dwelling unit occupied by an older person. May include all the services committed to repairing/modifying one unit in one program year, not to exceed a total of \$5,000. Note: Caregivers may serve more than one care recipient, resulting in more units of service than the number of unduplicated persons.

Service Area: See Application

Service: Health Maintenance

Service Definition: Services that include one or more of the following activities:

- Medical treatment by a health professional
 - Health education and counseling services for persons or groups about lifestyles and daily activities. Activities may include, but are not limited to:
 - o Art and dance –movement therapy
 - o Programs in prevention or reduction of the effects of chronic disabling conditions
 - o Alcohol and substance abuse
 - o Smoking cessation
 - o Weight loss and control
 - o Stress management
 - Home health services including, but not limited to, nursing, physical therapy, speech therapy, or occupational therapy
 - Provision of medications, nutritional supplements, glasses, dentures, hearing aids or other devices necessary to promote or maintain the health or safety of the older person.
- Note: this also includes the provision of dosage alert systems and the purchase of software, technical support, and materials that connects an eligible older person to free or reduced cost prescription medication services.

Unit of Service: One Contact. Record one contact each time an older person receives a health service as described.

Service Area: See Application

All Texas Administrative Code standards are located at the Texas Secretary of State website: www.sos.state.tx.us.

All Older Americans Act and other required rules and regulations are located at <https://acl.gov/about-acl/authorizing-statutes/older-americans-act>

Targeting: AAA-CB services are designed to identify eligible program participants, with an emphasis on high-risk program participants and to serve older individuals with greatest economic and social need, low-income minorities and those residing in rural areas, as required by the OAA or as identified through other grantees, such as the Aging and Disability Resource Center's Respite Care Program.

B. Services & Reimbursement Methodology:

Service	Fixed Rate (include rate)	Variable Rate (identify range)	Cost Reimbursement
Respite In-Home	\$ 13.50		
Personal Assistance	\$ 13.50		
Residential Repair	\$	Variable Rate	
Health Maintenance	\$	Variable Rate	

II. TERMS OF AGREEMENT

A. The Contractor agrees to:

1. Provide services in accordance with current or revised HHSC policies and standards and the OAA.
2. Submit billing with appropriate documentation including timesheets as required by the AAA by the close of business on the **5th calendar day** of each month following the last day of the month in which services were provided.
 - a. If the 5th day falls on a weekend or holiday, the information shall be delivered by the close of business on the following business day.
 - b. No reimbursement for services provided will be made if contractor payment invoices and supporting documentation are not correct and submitted to the AAA within **30 calendar days** of the month following the month in which services were provided.
 - c. Any concerns regarding discrepancies between the invoiced services and payment must be made within **45 calendar days** after payment is mailed.
3. The AAA-CB will encourage program participant contributions (program income) on a voluntary and confidential basis. Program participant contributions will be mailed directly by the program participant and/or his family to the AAA-CB office. AAA-CB will properly safeguard and accurately account for program participant contributions (program income) as receipts and expenditures on its financial reports. AAA-CB agrees to expend all program participant contributions (program income) to expand or enhance the program/service under which it is earned. If the Contractor or their paid provider inadvertently receives a program participant contribution, Contractor must immediately contact AAA-CB send contribution to the AAA-CB and advise program participant and/or their family of the proper program participant contribution submission procedure. AAA-CB will also advise program participant and/or family of the proper program participant contribution procedure.
4. Notify the AAA within 24 hours if, for any reason, the Contractor becomes unable to provide the service(s).
5. Ensure that all required insurance(s), certifications), training(s), or license(s) do not lapse.
6. Provide the AAA, within 10 days of agency's receipt of copies of changes, updates, or renewals to board members, corporate officers, ownership, insurance, certificates, trainings or licenses.
7. Maintain communication and correspondence concerning program participants' status.
8. Establish a method to guarantee the confidentiality of all information relating to the program participant in accordance with applicable federal and state laws, rules, and regulations. This provision shall not be construed as limiting AAA-CB or any federal or state authorized representative's right of access to program participant case records or other information relating to program participants served under this agreement.
9. Keep financial and program supporting documents, statistical records, and any other records pertinent to the services for which a claim for reimbursement was submitted to the AAA. The records and documents shall be kept for a minimum of seven years after close of contractor's fiscal year.
10. Make available at reasonable times and for required periods all fiscal and program participant records, books, and supporting documents pertaining to services provided under this agreement, for purposes of inspection, monitoring, auditing, or evaluations by AAA staff, the

Comptroller General of the United States and the State of Texas, through any authorized representative(s).

B. The Contractor further agrees:

1. The agreement may be terminated for cause or without cause upon the giving of 30 days advance written notice.
2. The agreement does not guarantee a total level of reimbursement other than for individual units/services authorized; contingent upon receipt of funds.
3. Contractor acknowledges it is an independent provider, NOT an agent of the AAA-CB. Thus, the Contractor indemnifies saves and holds harmless the AAA-CB against expense or liability of any kind arising out of service delivery performed by the Contractor. Contractor must immediately notify the AAA-CB if the Contractor becomes involved in or is threatened with litigation related to program participants receiving services funded by the AAA-CB.
4. Employees of the Contractor will not solicit or accept gifts or favors of monetary value by or on behalf of program participants as a gift, reward or payment.

C. Through the Direct Purchase of Services program, the AAA-CB agrees to:

1. Review program participant intake, assessment forms and any other required forms completed by Contractor, as required, determining program participant eligibility. Service authorization is based on program participant need and the availability of funds.
2. Provide timely written notification to Contractor of program participant's eligibility and authorization to receive services.
3. Maintain communication and correspondence concerning the program participants' status.
4. Provide timely technical assistance to Contractor as requested and as available.
5. Conduct quality-assurance procedures, which will include on-site monitoring visits and customer satisfaction surveys annually, to ensure quality services are being provided and if applicable, Centers for Medicare and Medicaid Services, exclusion reviews are conducted.
6. Contingent upon the AAA-CB's receipt of funds authorized for this purpose from HHSC, reimburse the Contractor based on the agreed reimbursement methodology, approved rate(s), service(s) authorized, and in accordance with subsection Section II.A.2. of this document within approximately 45 days of receipt of invoice - providing such invoice includes all required attachments, is complete and is accurate.

III. ASSURANCES

The Contractor shall comply with:

- A. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d *et seq.*)
- B. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794)
- C. Americans with Disabilities Act of 1990 (42 U.S.C. §12101 *et seq.*)
- D. Age Discrimination in Employment Act of 1975 (42 U.S.C. §§6101-6107)
- E. Title IX of the Education Amendments of 1972 (20 U.S.C. §§1681-1688)
- F. Food Stamp Act of 1977 (7 U.S.C. §200 *et seq.*)
- G. Drug Free Workplace Act of 1988
- H. Texas Senate Bill 1 - 1991, as applicable
- I. HHSC administrative rules, as set forth in the Texas Administrative Code, to the extent applicable to this Agreement.
- J. HHSC AAA Policies and Procedures Manual, to the extent applicable to this Agreement.

- K. Certification Regarding Debarment - 45CFR §92.35 Subawards to debarred and suspended parties; this document is required annually as long as this agreement is in effect.
- L. Centers for Medicare and Medicaid Services (CMS) State Medicaid Director Letter SMDL #09-001 regarding Individuals or Entities Excluded from Participation in Federal Health Care Programs
- M. HHSC (legacy DADS) Information Letter 11-07 – Obligation to Identify Individuals or Entities Excluded from Participation in Federal Health Care Programs
- N. HHSC Uniform Terms and Conditions

IV. FOCAL POINT DESIGNATION

The following agencies have been designated by the AAACB as focal points for services for persons 60 or older in the Coastal Bend Region: Area Agency on Aging of the Coastal Bend, Coastal Bend Aging & Disability Resource Center, Coastal Bend Center for Independent Living, Community Action Agency of South Texas, Catholic Charities of Corpus Christi, Inc., City of Corpus Christi, Kleberg County Human Services, Live Oak Senior Center, Nueces County Community Center, Portland Senior Center, and San Diego Civic Center.

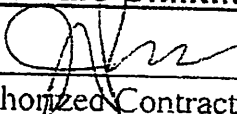
V. ATTACHMENTS

- A. Signed Data Use Agreement
- B. Signed Lobbying Certification
- C. Signed Prohibited Telecommunications and Video Services
- D. Signed HHSC Required Certifications
- E. Child Support Certification
- F. W-9

VI. SIGNATURES

For the faithful performance of the terms of this agreement, the parties affix their signatures and bind themselves effective August 28, 2022 and ending September 30, 2023.

Health Care Unlimited, Inc.

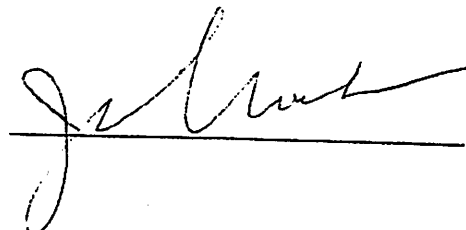


Authorized Contractor Signature

Joseph Ramon II

Print Name

CEO Administrator



Title

Authorized Signature

8-29-2022

Date

John P. Buckner, Executive Director
Coastal Bend Council of Governments
P. O. 9909
Corpus Christi, Texas 78469

09/01/22

Date

Attachment A

Data Use Agreement Form

Subcontractor Agreement Form

The DUA between HHS and CONTRACTOR establishes the permitted and required uses and disclosures of Confidential Information by CONTRACTOR. CONTRACTOR has subcontracted with Health Care Unlimited, Inc. (SUBCONTRACTOR) for performance of duties on behalf of CONTRACTOR which are subject to the DUA. SUBCONTRACTOR acknowledges, understands and agrees to be bound by the identical terms and conditions applicable to CONTRACTOR under the DUA, incorporated by reference in this Agreement, with respect to HHS Confidential Information. CONTRACTOR and SUBCONTRACTOR agree that HHS is a third-party beneficiary to applicable provisions of the subcontract.

HHS has the right but not the obligation to review or approve the terms and conditions of the subcontract by virtue of this Subcontractor Agreement Form.

CONTRACTOR and SUBCONTRACTOR assure HHS that any Breach or Event as defined by the DUA that SUBCONTRACTOR Discovers will be reported to HHS by CONTRACTOR in the time, manner and content required by the DUA.

if CONTRACTOR knows or should have known in the exercise of reasonable diligence of a pattern of activity or practice by SUBCONTRACTOR that constitutes a material breach or violation of the DUA or the SUBCONTRACTOR's obligations CONTRACTOR will:

1. Take reasonable steps to cure the violation or end the violation, as applicable;
2. If the steps are unsuccessful, terminate the contract or arrangement with SUBCONTRACTOR, if feasible;
3. Notify HHS immediately upon discovery of the pattern of activity or practice of SUBCONTRACTOR that constitutes a material breach or violation of the DUA and keep HHS reasonably and regularly informed about steps CONTRACTOR is taking to cure or end the violation or terminate SUBCONTRACTOR's contract or arrangement.

**COASTAL BEND COUNCIL OF GOVERNMENTS
RESOLUTION NO. 4033**

A RESOLUTION AUTHORIZING ACCEPTANCE OF A GRANTS FROM THE COASTAL BEND COMMUNITY FOUNDATION FOR LOCAL MATCH FOR FAMILY CAREGIVER EDUCATION AND TRAINING (\$6,000) SERVING THE COASTAL BEND REGION FOR THE PROJECT PERIOD SEPTEMBER 1, 2022 THROUGH AUGUST 31, 2023 IN THE TOTAL AMONT OF \$6,000.

WHEREAS, a required match of 25 percent is mandated under the Area Agency on Aging’s National Family Caregiver Support Program (NFCSP) under Title III E of the Older Americans Act and additional funds from local sources are needed each fiscal year to fulfill a portion of the required match; and additional local support; and

WHEREAS, on August 25th, 2022 a grant notification totaling \$6,000 was received from the Coastal Bend Community Foundation supporting Family Caregiver Support Services that would fulfill a portion of the required NFCSP 25 percent local match requirement; and

WHEREAS, the Advisory Council on Aging reviewed the grant application to the Coastal Bend Community Foundation for Family Caregiver Education and Training (\$6,000) at its September 12, 2022 meeting and recommends approval by the Coastal Bend Council of Governments.

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments concurs with its Advisory Council on Aging and therefore approves acceptance of a grant from the Coastal Bend Community Foundation for local match for Family Caregiver Education and Training (\$6,000) serving the Coastal Bend Region for the project period September 1, 2022 through August 31, 2023 in the total amount of \$6,000.

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

Mayor Patrick Rios, Chairman

ATTEST:

John P. Buckner, Executive Director

Improving the quality of life in the Coastal Bend



COASTAL BEND
COMMUNITY
FOUNDATION

355 N. Garandhua St.
Suite 900
Corpus Christi
Texas 78401

PH 361-882-9745
FX 361-882-2865
www.cbcbfoundation.org

Karen W. Selim, J.D.
President & CEO

Paula Dean
Amanda Keller
Betty G. Smith

Laura Fischer
Kirkby Townsend

Hon. Karin L. Knolle
David D. Fowler

Kicki W. Cunningham
Brad Womack

Pamela Leming Brower
Mike Carroll
Sarah Fisher
Ken Griffin
Al Jones
Richard E. Leshin
Hon. John B. Martinez
Hon. McComb
Richard E. Scanno
C. Michelle Uda
Karen O'Connor Urban
Jennifer B. Vogt

George N. Aduddell
Sandy D. Linney

Wes Hoskins
Tene Ivy

Paul R. Haas (1915-2005)
Patricia M. Eisenhauer



August 30, 2022

Ms. Viola Monrreal
Coastal Bend Council of Governments
Area Agency on Aging
2910 Leopard Street
Corpus Christi, TX 78408

SE

Dear Ms. Monrreal:

The Board of Directors of the Coastal Bend Community Foundation (CBCF) has met and considered applications for the 2022 Annual Grants. We are pleased to inform you that you have been awarded \$6,000 to continue to enhance and provide a multi-faceted system to support educational services to family caregivers. This is part of the National Family Caregiver Support Program 25% match. Our check in that amount is enclosed. Your acceptance of the grant confirms your acknowledgement of and compliance with our expenditure, reporting and publicity policies. *Failure to comply may jeopardize consideration of future grants.*

All grant funds from Coastal Bend Community Foundation must be spent in our seven-county service area encompassing Aransas, Bee, Jim Wells, Kleberg, Nueces, Refugio, and San Patricio counties. Please note the following concerning expenditure and reporting of the award.

- **A short grant report is due no later than May 1, 2023.** The grant report is accessed through the same online portal that you used to submit the application and acceptance. The link can be found on the website, as well as in the Grant Acceptance confirmation email.
- This report should be completed within 60 days of completion of your project or by May 1, 2023, whichever occurs first. If the entire award has been spent, no further reporting is necessary.
- If funds remain after May 1, 2023, you will be assigned a final report through the online portal that is due by September 30, 2023.
- **Funds must be spent by August 31, 2023.** *If there is a change from your original request, you must obtain our approval prior to repurposing the funds.*

Thank you for all you do to enhance the quality of life in the Coastal Bend. If you have any questions, please contact us.

Best regards,

Karen W. Selim, J.D.
President & CEO

Enclosure

BEND COMMUNITY FOUNDATION
555 N CARANCAHUA ST, STE. 900
CORPUS CHRISTI, TX 78401
PH. 361-882-9745

* Six Thousand and no/100 *

AY
TO THE
ORDER OF

DATE
08/31/2022

AMOUNT
\$ *****6,000.00

Coastal Bend Council of Governments
PO Box 9909
Corpus Christi, TX 78469-9909

**TWO SIGNATURES REQUIRED OVER 25,000
VOID AFTER 90 DAYS**

Karen D. Selvin

AUTHORIZED SIGNATURE

⑈055866⑈ ⑆114000093⑆ 664034953⑈

THIS DOCUMENT MUST HAVE A COLORED BACKGROUND, ULTRAVIOLET FIBERS AND AN ARTIFICIAL WATERMARK ON THE BACK - VERIFY FOR AUTHENTICITY

COASTAL BEND COMMUNITY FOUNDATION
7128 Coastal Bend Council of Governments

55866
08/31/2022 055866

20220580 08/25/2022 2022 Annual Grants
bond Thomas Bond Memorial Quasi-Endowment Fund

6,000.00
6,000.00

CHECK TOTAL: \$ *****6,000.00

RESOLUTION NO.4034

WHEREAS, the Coastal Bend Council of Governments maintains a Master Agreement for Mutual Aid (MAM) to support the region and to better respond to emergency incidents; and

WHEREAS, the Homeland Security Advisory Committee met on 16 September 2022 to review the updated Master Mutual Aid Agreement. The HSAC voted (12 yeas and no nays) to forward the new agreement to the CBCOG with a recommendation to approve; and

WHEREAS, the Parties recognize the vulnerability of the people and communities located within the region to damage, injury, and loss of life and property resulting from disasters and/or civil emergencies and recognize that disasters and/or civil emergencies may present equipment and manpower requirements beyond the capacity of each individual Party; and The Parties must confront the threats to public health and safety posed by possible terrorist actions and weapons of mass destruction and other incidents of man-made origin, and the threats to public health and safety from natural disasters, all capable of causing severe damage to property and danger to life; and

WHEREAS, the Parties to this Agreement recognize that Mutual Aid has been provided in the past and have determined that it is in the best interests of themselves and their citizens to create a plan to foster communications and the sharing of resources, personnel and equipment in the event of such calamities; and

WHEREAS, the governing officials of the Parties desire to secure for each Party the benefits of Mutual Aid for the protection of life and property in the event of a Disaster and/or Civil Emergency; and

WHEREAS, the Parties wish to make suitable arrangements for furnishing Mutual Aid in coping with disasters and/or civil emergencies and are so authorized and make this Agreement pursuant to Chapters 418, 433 and 791 of the Texas Government Code, Chapter 362 of the Texas Local Government Code, and all other constitutional and statutory provisions which may provide authority for any of the Parties; and The Parties recognize that a formal agreement for Mutual Aid would allow for better coordination of effort, would provide adequate equipment, and manpower, and would help ensure that Mutual Aid is accomplished in the minimum time possible in the event of a Disaster or Civil Emergency and thus desire to enter into an agreement to provide Mutual Aid.

WHEREAS, it is expressly understood that any Mutual Aid extended under this Agreement and the operational plans adopted pursuant thereto, is furnished in accordance with the "Texas Disaster Act of 1975" and other applicable provisions of law.

NOW, THEREFORE, BE IT RESOLVED, that the Coastal Bend Council of Governments hereby approves the Master Agreement for Mutual Aid Coastal Bend Council of Governments.

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

Patrick Rios, Chairman

ATTEST

John Buckner, Executive Director

MASTER AGREEMENT FOR MUTUAL AID
COASTAL BEND COUNCIL OF GOVERNMENTS

This Master Agreement for Mutual Aid (this "Agreement") is by and between participating members of the Coastal Bend Council of Governments (the "COG").

WHEREAS, the Parties recognize the vulnerability of the people and communities located within the region to damage, injury, and loss of life and property resulting from disasters and/or civil emergencies and recognize that disasters and/or civil emergencies may present equipment and manpower requirements beyond the capacity of each individual Party; and The Parties must confront the threats to public health and safety posed by possible terrorist actions and weapons of mass destruction and other incidents of man-made origin, and the threats to public health and safety from natural disasters, all capable of causing severe damage to property and danger to life; and

The Parties to this Agreement recognize that Mutual Aid has been provided in the past and have determined that it is in the best interests of themselves and their citizens to create a plan to foster communications and the sharing of resources, personnel and equipment in the event of such calamities; and

The governing officials of the Parties desire to secure for each Party the benefits of Mutual Aid for the protection of life and property in the event of a Disaster and/or Civil Emergency; and

The Parties wish to make suitable arrangements for furnishing Mutual Aid in coping with disasters and/or civil emergencies and are so authorized and make this Agreement pursuant to Chapters 418, 433 and 791 of the Texas Government Code, Chapter 362 of the Texas Local Government Code, and all other constitutional and statutory provisions which may provide authority for any of the Parties.; and The Parties recognize that a formal agreement for Mutual Aid would allow for better coordination of effort, would provide that adequate equipment and manpower is available, and would help ensure that Mutual Aid is accomplished in the minimum time possible in the event of a Disaster or Civil Emergency and thus desire to enter into an agreement to provide Mutual Aid.

It is expressly understood that any Mutual Aid extended under this Agreement and the operational plans adopted pursuant thereto, is furnished in accordance with the "Texas Disaster Act of 1975" and other applicable provisions of law.

1. **Legal Authority.** This Agreement is made pursuant to the authority of Chapters 418, 433 and 791 of the Texas Government Code, Chapter 362 of the Texas Local Government Code, and all other constitutional and statutory provisions which may provide authority for any of the Parties.

2. **Scope of Agreement.** (a) Each Party will endeavor to provide Disaster Assistance upon request from another Party. (The requesting Party is hereafter referred to as the "Requesting Party"; the requested Party as the "Responding Party").

"Disaster assistance" means provision of emergency management, police, fire, emergency medical, utility, street, debris removal, and other services, without limitation, during a Disaster.

"Disaster", consistent with the definition in Section 418.004 of the Texas Government

Code, means the occurrence or imminent threat of widespread or severe damage, injury, or loss of life or property resulting from any natural or man-made cause, including fire, flood, earthquake, wind, storm, wave action, oil spill or other water contamination, volcanic activity, epidemic, air contamination, blight, drought, infestation, explosion, riot, hostile military or paramilitary action, other public calamity requiring emergency action, or energy emergency (as that term is defined in Chapter 418 of the Texas Government Code), within the jurisdiction of any of the Parties.

The Parties agree that an act of terrorism is contemplated within the definition of "disaster" as that word is defined in Section 418.004 of the Texas Government Code. "Disaster" does not include ordinary emergencies, such as, hazardous material spills, which have historically been handled in the normal course of government operations by the Parties.

(b) In accordance with Section 362.002, Texas Local Government Code, law enforcement assistant may be provided only when the mayor or other officer authorized to declare a state of civil emergency in the requesting county, municipality, or port considers additional law enforcement officers necessary to protect health, life, and property in the county, municipality, or port because of disaster, riot, threat of concealed explosives, or unlawful assembly characterized by force and violence or the threat of force and violence by three or more persons acting together or without lawful authority.

3. **Request for Assistance.** The request for assistance will:
 - a. be made only after a Declaration of Local Disaster by a Requesting Party pursuant to Section 418.108, Texas Government Code, or after a proclamation of a State of Emergency under Section 433.001, Texas Government Code,
 - b. be made by the highest-ranking authority of Requesting Party available at the time of need,
 - c. be made to the highest-ranking authority of the Responding Party available at the time of need, and
 - d. specify to the greatest extent possible the nature of the problem requiring assistance and the resource/s requested.

Notwithstanding anything in this Agreement, the decision whether to respond in any particular situation or the level of response to be provided is at the sole discretion of the representative of the Responding Party making the decision. The Responding Party's representative will make a discretionary decision at the time of the request, considering the nature and magnitude of the request, whether and the extent to which the Responding Party's resources are available and should be provided.

4. **Incident Command.** (a) The Requesting Party will designate an Incident Commander. Resources provided by the Responding Party will be subject to the direction of the Incident Commander, unless the Incident Commander, based on all the facts and circumstances at the scene of operation, requests that the Responding Party take charge of the operation based on superior resources, expertise, or other reason. In order to realize maximum effectiveness, it is the intention of the Parties that the response be under unified command with the highest degree of coordination possible under the circumstances.

(b) Any Request for Assistance hereunder shall include a statement of the amount and type of equipment and number of personnel requested, shall specify the location to which the equipment and personnel are to be dispatched, and shall state the time period for which such equipment and personnel are requested. The Responding Party shall, in its sole discretion, determine what equipment and personnel are available to furnish the requested assistance.

(c) The Responding Party shall report to the Incident Commander at the location to which the equipment and personnel are dispatched.

(d) A Responding Party shall be released by the Requesting Party when the services of the Responding Entity are no longer required or when the officer in charge of the Responding party's forces determines, in the officer's sole discretion, that further assistance should not be provided.

5. **Training Exercises.** The Parties will endeavor to participate in joint training exercises and drills for emergency response situations which may result in a request under this Agreement.

6. **Other Mutual Aid Agreements, Supplementary Agreements and Protocols.** The Parties are encouraged, all or some, to enter into additional agreements and protocols governing response to particular situations and circumstances. Operating

departments of the Parties (for example, fire and police) are authorized and encouraged to enter into specific emergency protocols with their counterparts to enhance coordination in Disaster response situations. Notwithstanding Section 23 below, it is understood and agreed that certain signatory Parties may have heretofore contracted or may hereafter contract with each other for mutual aid in disaster situations, and it is agreed that this Agreement shall be subordinate to any such individual contact. To assist each other in the process of mutual aid response planning, each Party agrees to inform the other Parties of all mutual aid agreements that each Party has with other municipalities, entities, counties, and state or federal agencies.

Specifically, the existence of this Agreement shall not prevent a municipality, county, rural fire prevention district emergency services district, fire protection agency, organized volunteer group, or other emergency services entity from providing mutual aid assistance on request from another municipality, county, rural fire prevention district, emergency services district, fire protection agency, organized volunteer group, or other emergency services entity, in accordance with the provisions in Section 418.109 (d) of the Texas Government Code. Additionally, the existence of this Agreement shall not prevent any Local Government which is a Party hereto from providing emergency assistance to another Local Government which is not a party hereto, in accordance with the provisions in Section 791.027 of the Texas Government Code.

7. **Responsibility for Response Costs.** A Responding Party is authorized to request reimbursement from the Requesting Party for reasonable costs incurred pursuant to this agreement in furnishing disaster assistance. The Requesting Party will make reimbursement when it is reasonably, fiscally able, but no later than 90 days after receipt of a claim for reimbursement, subject to paragraph 21. The COG Executive Director will determine what costs are reasonable in the event of a dispute regarding a request for reimbursement. Personnel who are assigned, designated or ordered by their governing body to perform duties pursuant to this Agreement shall continue to receive from the Responding Party the same wages, salary, pension, and other compensation and benefits for the performance of such duties, including injury or death benefits, disability payments, and worker's compensation benefits, as though the service had been rendered within the limits of the jurisdiction where the personnel are regularly employed.

8. **Participation Notice.** Each Party shall notify the COG Executive Director of its

participation in this Agreement by furnishing an executed original of the attached Participation Notice.

9. **Administrative Services.** The COG agrees to provide administrative services necessary to coordinate this Agreement, including notifying Parties of new participants and withdrawals and timely providing Parties with a current list of contact information for each Party.

10. **Federal and State Participation.** Federal and state entities may participate in this Agreement, to the extent of any limitations of their authority, by furnishing an executed original of the attached Participation Notice to the COG Executive Director.

11. **Inventory and Database.** A current inventory and database of resources available to each Party for response under this Agreement shall be maintained by the COG and disbursed to the Parties on a timely basis, at least every six months. The COG will develop a form to facilitate Parties entry and updating of inventory and resource information, send reminders to parties to update information, place inventory and resource information on its website, and take other actions reasonably necessary for the Parties to access current information.

12. **Withdrawal.** A Party may withdraw from this Agreement at any time by written notice to the COG Executive Director, transmitting a copy of the action of the Party's governing body. The Party withdrawing from this Agreement will still be responsible for any outstanding claims for reimbursement.

13. **Not for Benefit of Third Parties.** This Agreement and all activities hereunder are solely for the benefit of the Parties and not the benefit of any third party.

14. **Exercise of Police Power.** This Agreement and all activities hereunder are undertaken solely as an exercise of the police power of the Parties, exercised for the health, safety, and welfare of the public generally, and not for the benefit of any particular person or persons and the Parties shall not have nor be deemed to have any duty to any particular person or persons.

15. **Immunity not Waived.** Nothing in this Agreement is intended, nor may it be deemed, to waive any governmental, official, or other immunity or defense of any of the Parties or their officers, employees, representatives, and agents as a result of the execution of this Agreement and the performance of the covenants contained herein.

16. **Civil Liability to Third Parties.** Each Responding Party will be responsible for any civil liability for its own actions in responding to a request for assistance, and will determine what level, if any, of insurance or self-insurance it should maintain for such situations.

17. **No Liability of Parties to One Another.** One Party may not be responsible and shall not be civilly liable to another for not responding, or for responding at a particular level of resources or in a particular manner. Each Party hereto waives all claims against the other Parties hereto for compensation for any loss, damage, personal injury, or death occurring as a consequence of the performance of this Agreement, except those caused in whole or in part by

the negligence of an officer, employee, or agent of another Party.

18. **Amendments to Agreement.** This Agreement may not be amended without the lawful action of the governing bodies of the Parties. No officer or employee of any of the Parties shall have authority to waive or otherwise modify the limitations in this Agreement, without the express action of the governing body of the Party.

19. **Captions.** Captions to provisions of this Agreement are for convenience and shall not be considered in the interpretation of the provisions.

20. **Equipment and Personnel.** During the time mutual aid is being furnished, all equipment used by the Party rendering aid shall continue to be owned, leased, or rented by the Party rendering aid. At all times while equipment and personnel of a Party rendering aid are traveling to, from, or within the geographical limits of the requesting Party in accordance with the terms of this Agreement, such personnel and equipment shall be deemed to be employed or used, as the case may be, in the full line and cause of duty of the Party rendering aid. In addition, such personnel shall be deemed to be engaged in a governmental function of their entity.

21. **Expending Funds.** Each Party which performs services or furnishes aid pursuant to this Agreement shall do so with funds available from current revenues of the Party. No Party shall have any liability for the failure to expend funds to provide aid hereunder.

22. **Term.** This Agreement shall become effective as to each Party when approved and executed by that Party. This Agreement shall continue in force and remain binding on each and every Party until such time as the governing body of a Party terminates its participation in this Agreement pursuant to Section 12 of this Agreement. Termination of participation in this Agreement by a Party(ies) shall not affect the continued operation of this Agreement between and among the remaining Parties and this Agreement shall continue in force and remain binding on the remaining Parties.

23. **Entirety.** This Agreement contains all commitments and agreements of the Parties with respect to the mutual aid to be rendered hereunder during or in connection with a disaster. No other oral or written commitments of the Parties with respect to mutual aid under this Agreement shall have any force or effect if not contained herein, except as provided in Section 6 above.

24. **Interlocal Cooperation Act.** The Parties agree that mutual aid in the context contemplated herein is a "governmental function and service" and that the Parties are "local governments" as that term is defined herein and in the Interlocal Cooperation Act.

25. **Severability.** If a provision contained in this Agreement is held invalid for any reason, the invalidity does not affect other provisions of the Agreement that can be given effect without the invalid provision, and to this end the provisions of this Agreement are severable.

26. **Validity and Enforceability.** If any current or future legal limitations affect the validity or enforceability of a provision of this Agreement, then the legal limitations are made a part of this Agreement and shall operate to amend this Agreement to the minimum extent necessary to bring this Agreement into conformity with the requirements of the limitations, and

so modified, this Agreement shall continue in full force and effect.

27. **Warranty.** The Agreement has been officially authorized by the governing body of each Party hereto and each signatory to this Agreement guarantees and warrants that the signatory has full authority to execute this Agreement and to legally bind the respective Party to this Agreement.

28. **Governing Law and Venue.** This Agreement shall be governed by the laws of the State of Texas. Venue for an action arising under this Agreement shall be in accordance with the Texas Rules of Civil Practice & Remedies Code.

