



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

Summary Information

Contact Information

Council of Government (COG): **Brazos Valley Council of Governments**

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City, State, Zip: **Bryan, TX 77802**

Allocation Summary

COG Allocation for All Programs: **\$8,848,603**

Local Buyout and Acquisition Program Total: **\$5,840,778**

Local Infrastructure Program Total: **\$3,007,825**

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 Brazos Valley Council of Governments (BVCOG) encouraged citizen participation in Method of Distribution (MOD) for the Community Development Block Grant Disaster Recovery (CDBG-DR) funds, DR-4332, in response to Hurricane Harvey. BVCOG hosted two public hearings in accordance with the guidelines provided in the Hurricane Harvey-Round 1 Councils of Governments Method of Distribution Guidelines. The first public hearing held June 13, 2018 focused on available funding opportunities, eligibility criteria, and MOD plan development. The second public hearing was conducted June 28, 2018 to receive public comment on the draft MOD.

BVCOG followed the BVCOG Citizen Participation Plan for Citizen and Non-Governmental Organizational outreach. Citizens and Non-Governmental Organizations were informed of the opportunity to participate in the Method of Distribution planning and development through several messaging means. Public meeting information was distributed by utilizing multiple local newspapers/medias, mass emails through normal BVCOG channels, letters to local organizations that provide services or housing for low to moderate income persons, public housing authorities, and such, and posting on the BVCOG website. BVCOG encouraged jurisdictions to inspire participation as well. Citizens, jurisdictions, and organizations had the availability to provide comments either orally during meetings, mail, or electronically to BVCOG.

Two forms, emails, letters and other methods were used to collect information and recommendations to the Method of Distribution. These forms were recorded as the Public Comment form and the other was the Commitment form. Jurisdictions completed commitment forms that addressed eligible needs which served as a foundation for drafting MOD allocation justifications. BVCOG did not receive any Public Comment forms; however BVCOG did receive two public

comments via email. The first public comment addressed a need for an animal shelter. This public comment was reviewed during the public hearing and was deemed inelible. The second public comment by email offered comments for strengthening BVCOG's draft MOD. The comments were reviewed with no additional action taken.

BVCOG's partnership with the jurisdictions, multiple public hearings, public service announcements, mass emails, and postings provided opportunities for the public to respond and address the Brazos Valley Method of Distributions for Hurricane Harvey.

First Public Hearing Information

Date/Time: June 13, 2018/1:30 p.m. Location: Brazos Valley Council of Governments, Board Room

Attendance: 23 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	6.7.18	Email date stamp of 6/7/2018 9:28 p.m.
<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input checked="" type="checkbox"/>	Mail	6.1.18	Letters were mailed to designated agencies and organizations: see attachment-mail merge

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 2, 2018	http://www.bvcog.org/programs/hurricane-harvey/ http://www.bvcog.org/programs/hurricane-harvey/

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>Brenham Press</i>	June 5, 2018	Clipping proof
<input checked="" type="checkbox"/>	<i>The Eagle</i>	June 7, 2018	Affidavit of Publication
<input checked="" type="checkbox"/>	<i>Madisonville Meteor</i>	June 6, 2018	Affidavit of Publication
<input checked="" type="checkbox"/>	<i>Navasota examiner</i>	June 6, 2018	Affidavit of Publication

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).	The BVCOG uses on a daily basis a number of methods to communicate with non-English speaking citizens. BVCOG has Spanish speaking employees who can provide translation services. Plus, BVCOG subscribes to a phone service that provides translation services for multiple languages. If

	needed, BVCOG will provide in person translator services for Spanish and sign language if notified within 3 days of the meeting if services are requested. Information provided in mail outs, notices, and emails.
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Second Public Hearing Information¹

Date/Time: **June 28, 2018 2:30 p.m.** Location: **Brazos Valley Council of Governments**

Attendance: **11 (9) sign-in; (2) no-sign in** 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	6.14.18	Email date state 6/14/2018 4:48 p.m.
<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	6.14.18	http://www.bvcog.org/programs/hurricane-harvey/

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>Brenham Press</i>	June 19, 2018	Clipping Proof
<input checked="" type="checkbox"/>	<i>The Eagle</i>	June 23, 2018	Affidavit of Publication
<input checked="" type="checkbox"/>	<i>Madisonville Meteor</i>	June 20, 2018	Affidavit of Publication
<input checked="" type="checkbox"/>	<i>Navasota Examiner</i>	June 20, 2018	Affidavit of Publication

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	The BVCOG uses on a daily basis a number of methods to communicate with non-English speaking citizens. BVCOG has Spanish speaking employees who can provide translation

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

other languages.

services. Plus, BVCOG subscribes to a phone service that provides translation services for multiple languages. If needed, BVCOG will provide in person translator services for Spanish and sign language if notified within 3 days of the meeting if services are requested. Information provided in mail outs, notices, and emails.

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.

Four out of seven counties totaling (18) jurisdictions in the Brazos Valley were impacted by Hurricane Harvey due to severe flooding which damaged infrastructure, homes, business, and such. The Brazos Valley Council of Government's Method of Distribution focused on low-to-moderate income affected areas to restore infrastructure, housing, and increase the local economy. As every disaster is at the local level, each jurisdiction suffered differently requiring special attention to address those unmet needs. The MOD provided jurisdictions the flexibility of utilizing the much needed funding to address those specific shortfalls.

The MOD addressed providing equal funding opportunities as long as eligibility requirements were met; specifically for low-to-moderate income impacted areas and funding eligibility requirements. Sixteen out of eighteen jurisdictions met those infrastructure requirements whereas only one county was able to use the buyout/acquisition allocations. The equal allocation aligned with non-participating jurisdictions would then be augmented at the county level to continue distributing to the most impacted areas.

Due to the limited amount of Disaster Recovery CDBG funding to address all unmet needs, the MODs focused on ensuring citizens will be placed out of harm's way in case of future disasters, address damage roadways through drainage improvements, improve water and sewer systems, flood and drainage improvements, and other eligible activities. All activities will be focused on doing the most good for its citizens in preventing, preparing, and mitigating the effects of major disasters.

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.

The Buyout/Allocation program will enable jurisdictions to assist citizens especially those low-to-moderate income areas the ability to move away from flooding hazards. This program will improve resiliency, prevent repetitive loss, and reduce extreme risk to human health and safety.

Local Infrastructure projects will address drainage, sewer and water systems, road repair, and other activities. Efforts to address these needs will foster long term recovery for the communities that were impacted by the damaged caused from the hurricane event. These projects will improve community continuity relieving the common stressed functionalities in providing the basic standard of care needs. The Local Infrastructure program will contribute to long-term recovery and restoration of housing in the HUD identified most impacted and distressed areas and all other areas by restoring, repairing and enhancing critical infrastructure that provides services and access to homes.

Affirmatively Furthering Fair Housing Statement

All sub recipients 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).

This Method of Distribution requires that all sub recipients to which funds are allocated must adhere to all program rules as established by GLO and/or HUD. The rules currently include a requirement that at least 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). Each sub recipient is responsible for meeting the LMI requirements within their jurisdiction.

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
1. Priority Needs with 70% dedicated to LMI 2. Redistribution	100%	Project Commitment Form Minutes	Grimes County is the only county in BVCOG that opted to utilize the program for Buyout and Acquisition. Grimes County was approved to use the full \$5,840,778 to address the needs in the county. Grimes County identified that only \$1,212,129 would be needed to complete projects in the jurisdiction. **The city of Todd Mission requested \$300,000 however does not meet the minimum threshold. Grimes County will assist Todd Mission by increasing request amount to \$1,512,129. Grimes county will be

			<p>managing the project as impacted areas may overlap.** Burlison, Madison, and Washington Counties opted-out of the Buyout & Acquisition program. The remaining unused funding, \$4,328,649 should be returned to the state to reallocate to the most impacted areas. Attendees during the public hearings and the public and Brazos Valley Board of Director's meeting approved the method.</p>
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*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
Equal allocations for	100%	Project Commitment Forms	The following counties and cities were deemed eligible to receive an

<p>Priority Needs with 70% dedicated LMI</p>		<p>Minutes</p>	<p>equal portion of the \$3,007,825 funding: Burleson county, Cities of Caldwell, Snook, and Somerville; Grimes County, Cities of Anderson, Bedias, Iola, Navasota, Plantersville, and Todd Mission; Madison County, Cities of Madisonville, Midway, and Normangee; Washington County, Cities of Brenham and Burton. Each jurisdiction is eligible for up to \$167,101.39. Counties will receive unused or partial allocations from incorporated eligible city jurisdictions to reallocate within the county. Two jurisdictions, city of Plantersville and city of Burton, declined allocation. This will increase allocation funding based on the MOD methodology to Grimes and Washington County to receiving \$334,202.78 each. Funding unused by the county will be reallocated to a jurisdiction within the eligible BVCOG region. "Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be the discretion of the GLO within the region" (p. 85 & 93,) IV. State Administered Disaster Recovery Program, F. GLO Use of Funds, 6. Local Infrastructure Sections, a. Local MOD Requirements, vii. The GLO will strongly consider the COG and County's suggestions for reallocation of funds within the region.</p>
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*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"/>	<p>The COG has chosen not to limit Grantees in the region to projects meeting regional priority activities.</p>
<p style="text-align: center;">-OR-</p>	

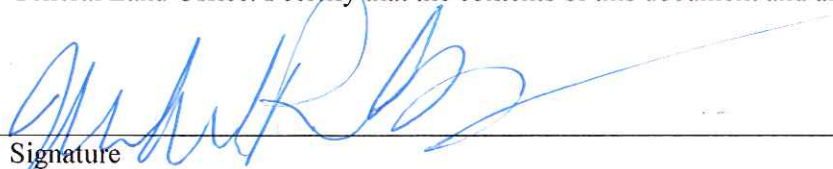
<input type="checkbox"/>	The COG has limited Grantees in the region to selecting projects meeting the following regional priority activities:	
<input type="checkbox"/>	Water Facilities	<input type="checkbox"/> Specially Authorized Public Facilities & Improvements
<input type="checkbox"/>	Sewer Facilities	<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 Disastery Recovery: Hurricane Harvey (Section IV.F.7.e) and should be referenced accordingly.

Approval and Signatory Authority

A Resolution of the COG is attached approving the method of distribution and authorizing its submittal to the Texas General Land Office. I certify that the contents of this document and all related attachments are complete and accurate.



 Signature

8/10/18

 Date

Michael Parks, AICP

 Printed Name

Assistant Executive Director; BVCOG

 Title

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