

**Texas General Land Office**

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



Delivered to the GLO: \_\_\_\_\_

Approved by the GLO: \_\_\_\_\_

**Council of Governments:** Central Texas Council of Governments

**Allocation Calculation Sheet Packet Page Number:** \_\_\_\_\_

**HUD MID and State MID Allocations**

HUD MID Total	N/A
State MID Total	\$6,769,000
<b>Grand Total COG Allocation</b>	\$6,769,000

Table 1

**Funding Limits**

<i>Minimum Amount Waiver Requested</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Minimum Amount	1,000,000	
Maximum Amount	N/A	

Table 2

**Regional Risk Mitigation**

Explain how the method of distribution reduces regional risks, how it will foster long-term community resilience that is forward-looking and encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, and flooding in the HUD-identified and State-identified most impacted and distressed areas.

The program will help create projects for risk mitigation in both Coryell and Milam counties. Due to Hurricane Harvey and the 2015-2016 storms, extensive flooding took place causing widespread damage throughout the respective counties. As a results of the damage to the counties of Milam and Coryell, CTCOG is choosing to directly allocate to these entities. These projects will help the counties' mitigation efforts for such hazards and reduce the potential impact of future flooding events, tropical storms, and hurricanes. Allocating directly to the counties furthers the regional mitigation priorities and results in a more comprehensive mitigation strategy. This funding will provide hazard mitigation projects which will prevent future flooding and damage to infrastructure and communities throughout the counties. This preparation will in turn save lives and money, creating community resiliency.

Table 3

## Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Eligible county for this program.	100%		CTCOG staff proposed an equal distribution of funds to accommodate for county level, regional mitigation projects.

Table 4

*\*Add more rows if needed*

## Threshold Factors

If any, please describe threshold factors that were used to allocate funds.

Threshold Factor*	Documentation Source	Explanation of Factor Selection

Table 5

*\*Add more rows if needed*

## Eligible Activities

Activities must meet the criteria outlined in the Regional Mitigation Program (COG MODs) section of the State of Texas CDBG Mitigation Action Plan.

The COG has addressed prioritization of eligible activities as follows:

<input checked="" type="checkbox"/>	The COG has chosen not to limit subrecipients in the region to projects meeting regional priority activities.		
<b>-OR-</b>			
<input type="checkbox"/>	The COG has limited subrecipients in the region to selecting projects meeting the following regional priority activities:		
<input type="checkbox"/>	Flood control and drainage improvement, including the construction or rehabilitation of stormwater management systems	<input type="checkbox"/>	Water and sewer facilities
		<input type="checkbox"/>	Communications infrastructure
		<input type="checkbox"/>	Provision of generators
<input type="checkbox"/>	Natural or green infrastructure	<input type="checkbox"/>	Removal of debris
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/>	Streets or bridges
<input type="checkbox"/>	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.

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.

CTCOG's strategic plan to meet the minimum 50% low- and moderate-income populations begins with our data selections and weights. LMI % is weighted at 50% in the allocation worksheet. Therefore, 50% of the allocation are focused on serving the economically distressed areas that are 51% or more LMI households or benefit households with incomes below 80% of the Area median Income (AMI). After the allocation has taken place, our regional partners have been well-informed about the intentions and purpose of this money and have already focused their attention on identifying projects that will have the best opportunity of meeting our regional threshold.

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):	Coryell County 2/17/2022 12:00PM & 6:00 PM Milam County 3/22/2022 12:00 PM & 6:00 PM	
Location(s):	Gatesville Council Chambers, 110 N 8th Street, Gatesville, TX 76528 Milam County Courthouse, 102 S Fannin Ave, Cameron, TX 76520	
Total Attendance:	Coryell:4 No public comment Milam:3 One public comment	

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 Date(s) Sent	MOD Public Hearing Date(s) Sent
<input checked="" type="checkbox"/>	Email	Emails process began for Coryell County February 9, 2022 and completed February 10, 2022 Emails for Milam County were sent out on March 14, 2022	
<input checked="" type="checkbox"/>	Fax	One fax sent out for Milam County on March 14, 2022	
<input type="checkbox"/>	Hand Delivery		
<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:

<b>Website Notice</b>	<b>Public Planning Meeting</b>	<b>MOD Public Hearing</b>
Date(s)	February 9, 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):

<b>Newspaper Name</b>	<b>Public Planning Meeting</b>	<b>MOD Public Hearing</b>
	Date Published	Date Published
Copperas Cove Leader-Press	February 11, 2022	
The Gatesville Messenger	February 12, 2022	
Rockdale Reporter	March 17, 2022	
The Cameron Herald	March 17, 2022	

Table 13

**Public Comment Period**

Provide the dates of the public comment period for the COG MOD.

Start Date:		End Date:		No. of Days:	
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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.

Prior to development of this Method of Distribution, CTCOG conducted public planning meetings in Cameron, at the Milam County Courthouse, and Gatesville, at the Gatesville Council Chambers. Comments were also accepted by mail, email, or fax. A Solicitation of Public Comment notice was published in English and Spanish in the Cameron Herald, Rockdale Reporter, Copperas Cove Leader-Press, and the Gatesville Messenger newspaper. Notices were sent to the County Judges and County Emergency Management Coordinators for Milam and Coryell Counties and the notices were posted publicly in the same location that meetings of the County Commissioners Court/Council Chambers are posted. The notices were posted at the CTCOG office in an area that is available for public viewing 24 hours a day. The notices were also posted on CTCOG's website. Notices were also emailed to identified impacted individuals. Following the first public hearing CTCOG drafted this document with insight and feedback that had been provided to the COG. In addition to the initial public hearing for input regarding the development of the MOD, once the draft MOD was posted, a public comment period of 14 days, 5/2/2022-5/16/2022, was open. During this period there was a second public hearing, on the 3rd of May at the Milam County Courthouse and the 4th of May Gatesville Council Chambers from 12pm-2pm, for the public to provide any additional feedback on the draft MOD.

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).

The COG will include information in all of the public hearing information about accommodations for those with disabilities and those with Limited English Proficiency. The facilities at the COG are ADA compliant. The COG will provide reasonable accommodations for those that request assistance at least 48 hours in advance. This can be done by calling 254-770-2365 or emailing [jesse.hennage@ctcog.org](mailto:jesse.hennage@ctcog.org). The COG will also work with local agencies that work with those with disabilities to help find the best ways to market the public sessions.

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:	Jesse Hennage
Title:	Assistant Director of Planning/Public Safety

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

Jim Reed

\_\_\_\_\_  
Printed Name

jim.reed@ctcog.org

\_\_\_\_\_  
Email Address

\_\_\_\_\_  
Date

CTCOG Executive Director

\_\_\_\_\_  
Title

(254) 770-2236

\_\_\_\_\_  
Telephone Number