



Delivered to the GLO:

Approved by the GLO:

Council of Governments: Alamo

Allocation Calculation Sheet Packet Page Number: 9

HUD MID and State MID Allocations

HUD MID Total	
State MID Total	\$29,888,000.00
Grand Total COG Allocation	\$29,888,000.00

Table 1

Funding Limits

<i>Minimum Amount Waiver Requested</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Minimum Amount	\$900,000.00	
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.

For the Method of Distribution (MOD), AACOG chose to allocate 50% of the total available funds to the seven (7) identified cities that are at 51% or higher low-to-moderate income (LMI) population (Group A communities). The Group A communities and residents are prioritized by various direct-service providers, including several other AACOG programs; however infrastructure improvements are relegated to local governments. Providing financial support to make much needed infrastructure improvements in high-risk areas is a priority for local governments, AACOG, the State, and HUD. Of the seven (7) identified cities, four (4) are communities within Hurricane Harvey impacted counties: Karnes City and Kenedy in Karnes County; and Marion and Seguin in Guadalupe County (also impacted by the 2015 floods). The other communities are within counties impacted by the 2015 floods: Charlotte in Atascosa County; and Dilley and Pearsall in Frio County.

The other 50% of the total funds were allocated to the nine (9) counties that were impacted by Hurricane Harvey and the 2015/2016 floods (Group B communities). Of the Hurricane Harvey impacted counties, only Karnes County was not impacted by the 2015 or 2016 floods; both Comal and Guadalupe Counties were impacted by the 2015 floods. Allocations were calculated using three weighted factors: LMI, SoVi, and total population. By separating allocations between Group A communities and Group B communities, we ensure every impacted county has the opportunity to invest in necessary projects – ideally projects that positively impact downstream communities. Additionally, Group B communities (counties) that have Group A

communities already receiving funding can use their allocation amounts to further support or enhance the Group A community project.

The MOD will reduce regional risk by targeting investment in areas impacted by Hurricane Harvey, 2015 Floods and 2016 Floods. Infrastructure improvements in the impacted areas will repair damage caused by the aforementioned weather events. In addition, flooding caused by future weather events should be reduced – with the goal being to eliminate flooding.

Determining which Distribution Factors to use in developing the AACOG MOD included discussions on resources available to the communities within the region. It was no surprise to find that urban communities tended to have more resources available to them including larger populations, property owners and businesses which contribute to the tax base. Smaller and rural communities do not have the larger numbers of these resources that urban communities do. With that in mind, staff turned to the Distribution Factors provided as options by the Texas GLO for COGs to select from and use in developing the MOD to assist the counties impacted by the 2015 and 2016 Floods, and Hurricane Harvey.

Use of the LMI Distribution Factor (source identified below in “Distribution Factors”) was included in determining the Alamo Region MOD based on the guidance provided in the Texas CDBG-MIT Regional Mitigation Program COG Method of Distribution Guidance document provided by the Texas GLO. In the document, 50% or more of the allocated funds must serve low- and moderate-income (LMI) populations. LMI was chosen as a distribution factor because high LMI communities largely represent historically underserved areas that have been identified by both HUD and the State as being the most distressed and suffer the most impact during natural disasters. In addition, LMI was considered a means to ensure that funds were allocated to distressed areas impacted by the 2015 and 2016 Floods, as well as Hurricane Harvey.

The waiver to include the counties impacted by the 2015 and 2016 floods was determined by the need for infrastructure improvements or repairs after repeated rain events damage streets, roads, and bridges while simultaneously deteriorating drainage adjacent to the damaged streets, roads and bridges in primarily rural areas. While several communities in the Alamo Region seek state and federal assistance to do infrastructure projects, they do not always possess the capability to provide a financial and/or in-kind match for grants. As indicated earlier, urban communities tend to have more resources to respond to weather disaster events. Providing an opportunity for the rural communities to have access to other sources of funding for projects is one way to help mitigate disasters and better plan for future events.

Table 3

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
LMI	50%	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important for historically underserved areas and populations to receive services.
Population	25%	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important for historically underserved areas and populations to receive services.

SoVI	25%	CDBG-MIT AP Analysis; Provided by TxGLO	Important that historically underserved areas and populations receive services.

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
LMI to identify eligible communities with LMI percentage at 51% or higher	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important to ensure 50% of allocation goes to those eligible communities with a minimum of 51% LMI, and to better serve communities with high LMI percentages

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"/>		<input type="checkbox"/>	Communications infrastructure
<input type="checkbox"/>		<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	<input type="checkbox"/>	Other infrastructure improvements
		<input type="checkbox"/>	Public Services (<i>within the 15% cap</i>)

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"/>	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.

Not Applicable

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.

Using the Excel workbooks provided to AACOG by the Texas General Land Office (GLO), the 50% low-and moderate-income (LMI) threshold information was given at the March 16 Public Planning Meeting. Additionally, the information will be provided at the Public Hearing, as well as during all one-on-one meetings with eligible entities.

\$14,944,000 of the \$29,888,000 allocation must benefit LMI areas, and are allocated accordingly based on the provided city LMI. 100% of the funds allocated to cities over 51% LMI must be spent on projects benefitting populations that meet the HUD LMI national objective.

The LMI requirement will help allocate funds to rural areas impacted by the 2015 and 2016 Floods, and Hurricane Harvey.

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):	March 16, 2022	TBD
Location(s):	2700 NE Loop 410, San Antonio, TX	Guadalupe County Courthouse 101 East Court Street, Seguin, TX
Total Attendance:	2	

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	March 9, March 16, 2022	TBD
<input type="checkbox"/> Fax		
<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:

Website Notice	Public Planning Meeting	MOD Public Hearing
Date(s)	March 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):

Newspaper Name	Public Planning Meeting	MOD Public Hearing
	Date Published	Date Published
Seguin Gazette	March 9, 2022	
Wilson County News	March 9, 2022	
Karnes Countywide	March 10, 2022	
Hondo Anvil	March 10, 2022	
Frio-Nueces Current	March 10, 2022	
Boerne Star	March 8, 2022	
Bandera Bulletin	March 9, 2022	
Pleasanton Express	March 9, 2022	
San Antonio Express-News	March 9, 2022	

Table 13

Public Comment Period

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

Start Date:	March 16, 2022	End Date:	April 1, 2022	No. of Days:	16
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Table 14

NOTE: Public Comment Period for this COG MOD was held during the planning phase of the MOD development.

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.

AACOG held a public planning meeting after normal business hours, and used several mediums of communication to promote this event. Outreach efforts included email newsletters, newspaper advertisements, and targeted social media posts and advertisements being pushed to residents of the zip codes that make up the eligible counties. Public Meeting details were sent out via Constant Contact software to the AACOG member government list (city and county elected officials and staff), the Comprehensive Economic Development Strategy (CEDS) committee, economic development contacts, and area housing authorities within those 9 counties.

Additionally, the meeting was offered virtually for attendees who could not attend in person. This opportunity to tune in live from your home or work was prominently advertised on the AACOG website and print/digital promotions. The public meeting was also recorded and uploaded onto our website, along with information to review the PowerPoint presentation – which was also made available on the AACOG website – and submit public comments before the April 1 deadline.

On June 2, AACOG held a virtual meeting with the housing authorities from the region. These authorities were listed in the Citizen Participation Plan.

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 details for the MOD, its development process, and public meeting access was produced in English and Spanish. Necessary and appropriate accommodations were made available at public meetings for residents needing assistance, and were promoted on all print and digital promotions of the public meeting.

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:	Claudia Mora
Title:	Regional Services Administrator

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.

Diane Rath
Signature

10/12/22
Date

Diane Rath
Printed Name

Executive Director
Title

drath@aacog.com
Email Address

210-362-5201
Telephone Number