



Council of Governments: Golden Crescent Regional Planning Commission

Allocation Calculation Sheet Packet Page Number: _____

HUD MID and State MID Allocations

HUD MID Total	\$42,649,000
State MID Total	\$37,668,000
Grand Total COG Allocation	\$80,317,000.00

Table 1

Funding Limits

<i>Minimum Amount Waiver Requested</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Minimum Amount	\$500,000.00	
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.

GCRPC’s MOD utilizes the HUD priority of low-to-moderate income (LMI) populations, the eligible entities total population, the eligible entities social vulnerability index, as well as their FEMA count destroyed damage assessment to provide each eligible entity a portion of the total allocation based on those factors. By utilizing LMI data for each community to determine their portion of the total allocation, GCRPC’s MOD prioritizes the direct benefit to LMI populations within the region. By prioritizing direct benefit to LMI populations, the region is reducing regional risks in communities within the Golden Crescent region for hurricanes, tropical storms and depressions, flooding and other disasters in the HUD-identified and State-identified most impacted and distressed areas.

GCRPC's MOD foster long-term community resilience and reduces regional risks by adhering to HUD and GLO funding guidelines for the Mitigation Program. These mandatory limitations on the use of allocated funds ensure entities meet state and federal goals identified in the State Action Plan and Federal Register.

Table 3

Distribution Factors

The COG has selected the following distribution factors:

Distribution Factor*	Weight	Documentation Source	Explanation of Factor Selection and Weighting
Low- to Moderate- Income (LMI)	33%	HUD	HUD's LMI data weighted at 33% because the prioritization of LMI households within the region reduces risks related to disaster
Population	33%	2019 5-Year American Community Survey from the U.S. Census Bureau from the GLO	Each eligible entities total population was also included at 33% in order to provide funding that would adequately address risks related to disaster based on the eligible entities total number of people
Social Vulnerability Index	33%	CDBG-MIT AP Analysis	The Social Vulnerability Index (SoVI) analyzes 29 socioeconomic variables that have proven to influence a community's ability to respond to, prepare for, and recover from hazards. The eligible entities SoVI was weighted at 33%
FEMA damage assessment	1%	FEMA IA Non-PII applicant data	To mitigate repetitive loss, the eligible entities FEMA count destroyed damage assessment data was weighted at 1%

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
N/A	N/A	N/A

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"/>	Natural or green infrastructure	<input type="checkbox"/>	Communications infrastructure
<input type="checkbox"/>	Public Facilities (shelter, library, etc.)	<input type="checkbox"/>	Provision of generators
<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"/>	Removal of debris
		<input type="checkbox"/>	Streets or bridges
		<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
------------------------------	--

Table 7

If yes, please provide the following information:

- The eligible entity benefitting from the project;
- A description of the project and how it meets the definition of a mitigation activity; and
- The cost of the Covered Project.

N/A

Table 8

Low-and Moderate-Income Requirements

Below is the strategic plan of how the method of distribution meets the minimum 50 percent low- and moderate-income (LMI) requirement.

GCRPC’s MOD utilized a weighted allocation where the communities LMI population data carried 33 percent of the weight, the communities total population data carried 33 percent, their social vulnerability index carried a 33 percent weight, and their FEMA count destroyed damage assessment also carried a 1 percent weight to reach a reasonable allocation for each community. Each allocation to an eligible entity is coupled with a 50 percent low-to-moderate income (LMI) requirement amount. Thus, each entity allocated funding is aware of the total amount of funding required to either benefit areas that are 51 percent or more LMI populations or populations with incomes below 80 percent of the Area Median Income (AMI).

Each entity responsible for the management and administration of allocated funds is required to generate, maintain, and submit all evidence supporting a project’s adherence to their 51 percent LMI requirement.

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):	April 27, 2022	September 19-28
Location(s):	Golden Crescent Regional Planning Commission 1908 N. Laurent St. Ste. 600 Victoria, TX 77901	Calhoun County, DeWitt County, Goliad County, Gonzales County, Jackson County, Lavaca County, and Victoria County
Total Attendance:	32	300+

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	April 12, 2022	September 2, 2022

<input type="checkbox"/>	Fax		
<input type="checkbox"/>	Hand Delivery		
<input checked="" type="checkbox"/>	Certified Mail	April 12, 2022	

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)	April 20, 2022	September 12, 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
Cuero Record	April 20, 2022	September 14, 2022
Goliad Advance Guard	April 21, 2022	September 22, 2022
Gonzales Inquirer	April 14, 2022	September 14, 2022
Hallettsville Tribune Herald	April 20, 2022	September 14, 2022
Jackson County Herald Tribune	April 20, 2022	September 14, 2022
Port Lavaca Wave	April 20, 2022	September 14, 2022
Revista	April 20, 2022	September 14, 2022
Victoria Advocate	April 18 – 20, 2022	September 14, 2022

Table 13

Public Comment Period

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

Start Date:	September 19, 2022	End Date:	October 14, 2022	No. of Days:	25
Start Date:	December 28, 2022	End Date:	January 12, 2023	No. of Days:	15

Table 14

Citizen Participation

Describe how the COG conducted their citizen and non-governmental organization outreach, including any efforts exceeding GLO minimum public participation requirements. These efforts should comply with the Citizen Participation Plan provided to the GLO.

GCRPC will engage in Citizen and Non-Governmental Organization (NGO) outreach through 1) the GCRPC website, 2) public notices, and 3) press releases. GCRPC will first hold a public planning meeting prior to the development of the MOD. Once approved, Citizens and NGOs will be encouraged to review the GCRPC Method of Distribution (MOD) made available through the GCRPC website and participation in scheduled public hearings. Citizens and NGOs may submit written comments to the GCRPC via letter or email.

Additionally, citizens and NGOs may comment when attending scheduled public hearings where comments will be recorded. The public comment period will begin the date of our first public hearing, and last until 15 days after the final public hearing.

In addition to the public planning meeting and the public hearings required by GLO, the GCRPC will address MOD at its Board of Director's meeting. The meetings wherein the MOD was addressed occurred on the following dates: 11/09/22, 11/21/22, 12/12/22, 02/01/23, 02/27/23, 03/01/23. These meetings are already public meetings offered virtually and recorded for public participation. Any MOD Public Meetings/Hearings will occur immediately following the close of the Board meeting and will also be offered virtually and recorded.

GCRPC will hold public hearings in all 7 counties within the Golden Crescent region to ensure input is received from outlying counties.

Further, an updated draft version of the GCRPC MOD will be posted and maintained on the GCRPC website and available at the GCRPC offices for public review.

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).

Public meeting/hearing locations will be fully accessible to persons with disabilities. Public meeting/hearing announcements will include information on accessibility request for individuals requiring an interpreter, auxiliary aids, or other services. Language will be included in the notices describing the 72 hour notice required for requesting accommodations.

Spanish interpreters may be requested to provide assistance to any member of the public interested in participating in GCRPC’s public meeting/hearings. All public notices and postings will include instructions for members of the public to request an interpreter. Language will be included in the notices describing the 72 hour notice required for requesting accommodations.

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:	Rebecca Spears
Title:	Member Services

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

3/23/2023
Date

Michael Ada
Printed Name

Executive Director
Title

michaela@gcrpc.org
Email Address

361.578.1587
Telephone Number