



Council of Governments (COG) Method of Distribution Amendment 1 Hurricane Harvey CDBG-Disaster Recovery Local Infrastructure Program

Contact Information

Council of Governments: Alamo

Principal Contact Name, Title: Claudia Mora, Regional Services Administrator

Principal Contact Telephone: 210-918-1284

Local Infrastructure Program COG MOD Amount:

\$1,317,225.00

Reallocation Amount:

HUD MID Total	
State MID Total	\$1,317,225.00
Total Reallocation Amount	\$1,317,225.00

Local Infrastructure Program Method of Distribution Amendment Detail

The COG is required to prepare a method of distribution amendment 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. The distribution should be based on, but not limited to, unmet need tied back to Hurricane Harvey damages.

Reallocation Summary

The following is a summary of the reallocation process of funds, including entities that have declined funds, entities that are receiving reallocated funds, and eligible activities.

For the Method of Distribution (MOD), AACOG chose to use new distribution factors to determine the allocation of the \$1,317,225.00 to eligible communities in the Hurricane Harvey impacted counties of Comal, Guadalupe, and Karnes counties. Those distribution factors are: Low-to-Moderate Income (LMI) at 50% weight, Population at 25%, and Societal Vulnerability Index at 25%. The original factors with updated data were not available.

Of the three (3) counties, only Karnes County is eligible for an allocation, as the other two (2) declined funds in the first round. The non-entitled CDBG eligible communities in the impacted counties that did not decline funds decline funds in the first round, a total of five (5) communities, are included in the MOD. In addition, these communities are prioritized by various direct-service providers, including a number of AACOG programs. 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.

The eligible communities included in the MOD are: Bluverde/Spring Branch, Falls City, Karnes City, Kenedy, Marion.

AACOG has chosen not to limit Subrecipients in the region to projects meeting regional priority activities.

Reallocation Changes Table:

Attached is a table showing all jurisdictions that have had a change in allocation, including jurisdictions that have declined funds and the jurisdictions that have been reallocated those funds. All allocations must meet or exceed a floor of \$100,000 to help ensure sufficient funds for at least one eligible project.

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Distribution Factors

Have the distribution factors been amended?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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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 receive services.
Population	25%	LMISD by Local Governments, Based on 2011-2015 ACS; Provided by TxGLO	Important for historically underserved areas and populations receive services.
SoVI	25%	CDBG-MIT AP Analysis; Provided by TxGLO	Important that historically underserved areas and populations receive services.

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*Add more rows if needed

Threshold Factors Not Applicable

(New Added Section)

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

Distribution Factor	Documentation Source	Explanation of Factor Selection

Eligible Activities

Have the eligible activities been amended?

Yes No

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 as amended.

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 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"/>	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 and should be referenced accordingly.

Low- and Moderate-Income Requirement

Below is an explanation of how the method of distribution meets the 70 percent low- and moderate-income (LMI) requirement for each program. This means that 70 percent of the funds must benefit areas that are 51% or more LMI persons with incomes below 80% of the Area Median Income (AMI).

Using the Excel workbooks provided to AACOG by the Tx GLO, the distribution factors were given at the Public Planning Meeting held on November 10, 2022, in addition to the Public Hearing held on December 16, 2022.

The 70% Low-to-Moderate Income (LMI) factor was listed and stressed during both meetings.

Of the \$1,317,225.00, \$922,058.00 allocation must benefit LMI. The LMI percentage for each proposed funded community are provided in the summary.

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:

A Public Planning Meeting was held on Thursday, November 10, at 5:30 p.m. in the AACOG Board Room. Meeting notices were published in newspapers in the three (3) counties; as well as posted on the AACOG website. The meeting was attended in person by three (3) AACOG staff, and online via GoToMeeting by Texas General Land Office (TxGLO) staff.

Meeting information was sent out to the impacted counties and communities via Constant Contact. AACOG used its mailing lists of city and county elected officials and staff, economic development contacts and area housing authorities.

Public Hearing Information

Meeting Type	Public Planning Meeting	MOD Public Hearing
Date(s):	November 10, 2022	December 21, 2022
Location(s):	2700 NE Loop 410, San Antonio, Tx	101 N. Panna Maria Avenue, Karnes City Texas
Total Attendance:	0	

Direct Notice. As required, direct 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 type="checkbox"/> Email		
<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:

Website Notice	Public Planning Meeting	MOD Public Hearing
Date(s)	November 2, 2022	December 16, 2022

Published Notice. As required, notice of the public hearing was published in all newspapers of record at least **three (3) days** in advance. Notice of public hearing was published in the following regional newspaper(s):

Newspaper Name	Public Planning Meeting	MOD Public Hearing
	Date Published	Date Published
New Braunfels Herald	November 6, 2022	December 15, 2022

Seguin Gazette	November 2, 2022	December 11, 2022
Boerne Star	November 6, 2022	
San Antonio Express-News	November 4, 2022	
Karnes Countywide		December 15, 2022

Public Comment Period

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

Start Date:	December 16, 2022	End Date:	January 16, 2023	No. of Days:	31
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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 develop process, and public meeting access was produced in English and Spanish. Necessary and appropriate accomodations were made available at public meetings for residents needing assistance, and were promoted on all pring and digital promotions of the Public Planning Meeting and Public Hearing.

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.

Approval 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

Diane Rath

Executive Director

Printed Name

Title

drath@aacog.com

210-362-5201

Email Address

Telephone Number

City or County	First Distribution Factor: LMI			Second Distribution Factor: Population			Third Distribution Factor: SoVI			Proportional Weighted Factor (PWF)	Infrastructure - Allocation for Formulaic Distribution (AFD)	Proportional Distribution PWF x AFD
	SUM of Factors: 2.88733			SUM of Factors: 31740			SUM of Factors: 24					
	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)			
Karnes County	46%	50%	0.08	15545	25%	0.12	5	25%	0.05	25%	\$ 1,317,225	\$335,658.66
Bulverde / Spring Branch	21%	50%	0.04	5185	25%	0.04	1	25%	0.01	9%	\$ 1,317,225	\$114,277
Falls City	29%	50%	0.05	1172	25%	0.01	2	25%	0.02	8%	\$ 1,317,225	\$106,459
Karnes City	62%	50%	0.11	3404	25%	0.03	3	25%	0.03	16%	\$ 1,317,225	\$217,335
Kenedy	52%	50%	0.09	3384	25%	0.03	3	25%	0.03	15%	\$ 1,317,225	\$195,457
Runge	4%	50%	0.01	1048	25%	0.01	5	25%	0.05	7%	\$ 1,317,225	\$87,857
Marion	51%	50%	0.09	970	25%	0.01	3	25%	0.03	13%	\$ 1,317,225	\$168,541
Santa Clara	23%	50%	0.04	1032	25%	0.01	2	25%	0.02	7%	\$ 1,317,225	\$91,640
SUM	2.88733			31740			24					
Proportion Total Total:										100%		\$1,317,225

Final Allocation are based on minimum requirement of \$100,000 for infrastructure grants; therefore, communities highlighted above with less than \$100,000 will be rolled over into the county's allocation. In the case of Santa Clara, it is located in Guadalupe County and the county is not eligible. The Santa Clara amount will be rolled into Marion's allocation, as Marion will use its funds for road repairs that benefit both communities.

Runge 87,857
Karnes County 335,658.66
Revised Karnes Allocation 423,516

Santa Clara 91,640
Marion 168,541
Revised Marion Allocation 260,181

Hurricane Harvey
Regional Method of Distribution Allocation Summary

COG:

ALAMO

<i>Required</i>	Local Infrastructure Program					
	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>
City or County	HUD MID or State MID	Initial Allocation	Change	Amended Allocation	Percentage of Allocation	70% Low-to-Moderate Income Benefit Requirement
<i>Karnes County</i>	State MID	\$ 74,177.00	\$423,516.00	\$ 497,693	31.22%	\$ 348,385.10
<i>Bulverde/Spring Branch</i>	State MID	\$ 61,528.00	\$114,277.00	\$ 175,805	11.03%	\$ 123,063.50
<i>Falls City</i>	State MID	\$ -	\$106,459.00	\$ 106,459	6.68%	\$ 74,521.30
Karnes City	State MID	\$ 33,745.00	\$217,335.00	\$ 251,080	15.75%	\$ 175,756.00
Kenedy	State MID	\$ 50,853.00	\$195,457.00	\$ 246,310	15.45%	\$ 172,417.00
Marion	State MID	\$ 56,593.00	\$260,181.00	\$ 316,774	19.87%	\$ 221,741.80
	Total:	\$276,896	\$1,317,225	\$1,594,121	100.00%	\$1,115,885