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July 31, 2018

Pamela Patenaude  
Deputy Secretary  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street S.W.  
Washington, DC 20410

Dear Deputy Secretary Patenaude:

Thank you for your continued support of the greater Houston region and the State of Texas as we undertake the long recovery from Hurricane Harvey. Following our productive meeting at HUD's offices in Washington, DC in March, the City of Houston and Harris County are working closely with our partners at the General Land Office (GLO) to ensure that the state's amended Action Plan for housing recovery is submitted to HUD for approval as quickly as possible.

As we move into this next phase of long-term recovery and begin programs to rebuild greater Houston's housing stock, we are writing to propose a way forward that links housing investments to forthcoming funds for infrastructure and mitigation activities.

We understand that your office is soon to publish the Federal Register Notice for the funds intended to support mitigation activities that HUD [awarded](#) on April 10, 2018. We are pleased that the City of Houston will receive \$61.9 million as a direct grantee as part of this award. The State of Texas will receive an additional \$4.7 billion for mitigation activities in this award.

It is essential that the Houston region has an integrated, strategic approach to recovery. To achieve this objective, we are proposing that Houston and Harris County have local control over a portion of the Texas mitigation funds, in line with the way housing funds have been allocated as a large sub-grant from the State of Texas. Such an approach will support Houston and Harris County's recovery in four key ways:

- **Protecting investments in housing with complementary infrastructure and mitigation investments, in line with HUD's expectations:** HUD's February 9, 2018 [Federal Register Notice](#) emphasizes that the \$5.2 billion available for recovery in Texas should prioritize housing:

*Given the extent of damage to housing in the eligible disaster areas and the very limited data at present regarding unmet infrastructure and economic revitalization needs, this notice requires each grantee to primarily consider and address its unmet housing recovery needs. (p. 5844)*

In the same Notice, HUD makes clear that housing and mitigation are linked. With such significant investments in housing, HUD's intent is clear that any investment in the housing stock should be reinforced by infrastructure and mitigation activities to protect housing from future flooding. For example:

*HUD encourages grantees to incorporate preparedness and mitigation measures into CDBG–DR assisted activities to rebuild communities that are more resilient to future disasters. (p. 5851)*

*[T]he needs assessment must...[t]ake into account the costs of incorporating mitigation and resilience measures to protect against the anticipated effects of future extreme weather events and other natural hazards and long-term risks. (p. 5849)*

*[The action plan must contain] A description of how the grantee will: (a) Design and implement programs or activities with the goal of protecting people and property from harm; (b) emphasize high quality, durability, energy efficiency, sustainability, and mold resistance; (c) support adoption and enforcement of modern and/or resilient building codes and mitigation of hazard risk, including possible sea level rise, high winds, storm surge, and flooding, where appropriate; and (d) implement and ensure compliance with the Green Building standards required in paragraph B.32.a of section VI of this notice. (p. 5850)*

*Grantees should describe how preparedness and mitigation measures will be integrated into rebuilding activities and how the grantee will promote community-level and/or regional (e.g. multiple local jurisdictions) post-disaster recovery and mitigation planning. (p. 5850)*

*[The action plan must contain] A description of the grantee's proposed use of CDBG–DR funds to develop a disaster recovery and response plan that addresses long-term recovery and pre- and post-disaster hazard mitigation, if one does not currently exist. (p. 5850)*

*HUD encourages grantees to incorporate preparedness and mitigation measures into CDBG–DR assisted activities to rebuild communities that are more resilient to future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief or longterm recovery that responds to the eligible disaster. (p. 5851)*

We strongly agree that we need an integrated housing and mitigation strategy to maximize the benefit of these recovery resources. Between Houston and Harris County, we will soon spend more than \$2 billion in federal funds to support housing recovery. We must protect these investments for the future.

Achieving the full benefit of both housing and mitigation investments requires close coordination between our jurisdictions. With distinct but interrelated responsibilities for large- and small-scale flood mitigation, it is critically important that we develop an integrated Houston-Harris County strategy for mitigation that reinforces our housing investments.

- **Designing the recovery in response to community input:** Houston and Harris County have already conducted extensive community engagement about recovery from Hurricane Harvey. As the City of Houston Housing and Community Development Department wrote in the [summary](#) of its community engagement meetings, “Housing and drainage are deeply connected. While our meetings were primarily about housing recovery, most people also

identified drainage as a major concern” (p. 5). Houstonians across the region anticipate that the government will deliver an integrated, strategic approach to housing and infrastructure.

Likewise, during Harris County’s extensive community engagement, regardless of location, residents continually echoed the need for local drainage improvements as a critical unmet need. Nearly 90 percent of all respondents to the County’s unmet Harvey Recovery needs survey identified drainage improvements to prevent flooding during heavy rains as the highest priority need.

- **Maximizing available federal dollars for their intended purposes:** As we learn more about the damage caused by Harvey, it’s clear that the available funds – while significant – do not meet the true need. Houston and Harris County have conducted additional needs assessments showing that the outstanding unmet housing need far outstrips the available funds for housing recovery. Similarly, local infrastructure preliminary studies have identified more than \$6 billion in neighborhood level drainage improvement projects to mitigate against future flooding and further protect our region’s local housing stock.

A key part of our local strategy in maximizing use of federal funds is our partnership with the Harris County Flood Control District (District). In operation for more than 80 years, the District maintains more than 1,500 channels across 22 watersheds that traverse Houston and the other 33 cities in Harris County. The District’s experience and leveraged resources will allow coordinated, local planning of a comprehensive flood mitigation program. In partnership with the City and County, the District is identifying connections between the watershed improvements and neighborhood level street drainage. Such coordination can only occur with the local control under a direct sub-grant to the City and County.

Congress and HUD have understandably split the major recovery funds for Texas into two rounds: the first for housing recovery and the second for mitigation. In accordance with HUD’s directive in the February 9 Notice, our jurisdictions will devote most of the first round of funds to housing recovery. This strategy will only be effective if we have HUD’s support in ensuring that the second round of funds are available for the Houston region’s significant infrastructure and mitigation needs.

- **Advancing fair housing:** Significant recovery spending is an opportunity for our region to further fair housing and roll back decades of housing discrimination that long predate our administrations. A key component of any fair housing approach is mitigation and infrastructure investments to protect all neighborhoods from future flooding. We are grateful for HUD’s partnership in advancing fair housing throughout the Houston area and its focus on infrastructure as a key way forward. A linked strategy for housing and infrastructure is essential to the success of this plan.

We know you share our vision for a recovery that advances equity and resilience across the Houston region as we build forward from this disaster. We believe that a dedicated program for Houston and Harris County that would allow us to effectively link our housing and infrastructure investments is the best way to achieve this goal. Each of our administrations is prepared to deliver a project-level list of investments in infrastructure and mitigation that will protect housing investments. We will soon be in Washington, DC and would welcome the chance to discuss further.

Thank you for your ongoing support.

Sincerely,



Sylvester Turner  
Mayor



Ed Emmett  
County Judge

Cc: The Honorable Greg Abbott, Governor of Texas  
US Senator John Cornyn  
US Senator Ted Cruz  
Congressman Ted Poe, Congressional District 2  
Congressman John Culberson, Congressional District 7  
Congressman Kevin Brady, Congressional District 8  
Congressman Al Green, Congressional District 9  
Congressman Michael T. McCaul, Congressional District 10  
Congresswoman Sheila Jackson Lee, Congressional District 18  
Congressman Pete Olson, Congressional District 22  
Congressman Gene Green, Congressional District 29  
Congressman Brian Babin, Congressional District 36  
Neal Rackleff, Assistant Secretary, U.S. Department of Housing and Urban Development  
Ana Farias, Assistant Secretary, U.S. Department of Housing and Urban Development  
George P. Bush, Commissioner, Texas General Land Office  
Marvin Odum, Chief Recovery Officer, City of Houston  
Tom McCasland, Director of Housing and Community and Development, City of Houston  
Daphne Lemelle, Community Development Director, Harris County  
Russ Poppe, Executive Director, Harris County Flood Control District