



CITY OF HOUSTON

Housing & Community Development Department

Sylvester Turner

Mayor

Tom McCasland
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September 4, 2019

David A. Storms
Regional Environmental Officer
U.S. Department of Housing and Urban Development
Unit #45, Suite 2800
Fort Worth, Texas 76102

Re: Waiver Request for Reduction of Search Radius for Owner Occupied Single Family Residential Reimbursement, Rehabilitation and Reconstruction CDBG-DR projects

Dear Mr. Storms,

As we mark the second anniversary of Hurricane Harvey, the City of Houston strongly supports the Texas General Land Office's request to lessen administrative barriers to recovery by reducing the area around a home that must be included in disaster recovery-related environmental reviews.

We therefore, fully support GLO's interpretation of 24 CFR 58.5(i)(2) with the understanding that the waiver would apply with the terms specified therein, particularly footprint limitations and water source restrictions that ensure proposed work is unlikely to be affected by any nearby environmental conditions. These terms are central to the City of Houston's support of the waiver, as they encompass key environmental protection provisions for all disaster recovery single-family reimbursement, rehabilitation and reconstruction applications.

Like HUD's recent determination that Noise analysis at 24 CFR 51.101(a)(3) and Acceptable Separation Distance analysis at 24 CFR 51.201 **do not apply** to disaster recovery projects, the requested waiver would expedite the process of restoring properties and limit the amount of exposure to potential hazards.

We look forward to working with your office and appreciate your consideration of GLO's proposed waiver.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom McCasland".

Tom McCasland
Director
Housing & Community Development Department
City of Houston