



# CITY OF HOUSTON

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**Sylvester Turner**

Mayor

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Monday, January 6, 2020

The Honorable George P. Bush  
Commissioner, Texas General Land Office  
1700 N. Congress Avenue  
Austin, Texas 78701

Commissioner Bush:

Houston has experienced 6 disaster declarations associated with flooding within the last 5 years. It is located in the only county in Texas to have been consecutively impacted by the 2015, 2016, 2017, and 2019 disasters. There is no other region in the State of Texas that must mitigate against this type of frequent and economically-impactful threat. The City of Houston respectfully requests a CDBG-Mitigation allocation proportionate to the past damages and ongoing risk within the Houston-Harris County region.

Hurricane Harvey impacted over 300,000 households and disrupted the lives of 4.6 million persons and thousands of businesses in Houston and Harris County alone. Tropical Storm Imelda in 2019 was only the latest stark reminder of this fact. The massive mitigation needs of the City of Houston and Harris County require substantial financial assistance. Continuous regional coordination has ensured that the region is on the path to recover and improve resilience to flooding disasters. The residents of both Houston and Harris County have continued to make sizable investments with the passage of the \$2.5 billion Harris County Flood Control District bond package and the City of Houston's \$6 billion Build Houston Forward infrastructure program.

The Community Development Block Grant Mitigation (CDBG-MIT) funding offers the opportunity for the City and Harris County to go beyond recovery and increase the region's resilience by mitigating risks that our communities continue to face. The *State of Texas CDBG Mitigation Action Plan* (State Action Plan) for the use of the CDBG-MIT funding, put forth by the General Land Office, offers impacted areas and communities at risk an opportunity to increase safety, build stronger and be more prepared for the devastating effects of future storms.

Throughout the comment period and in advance of the release of the draft version of the State Action Plan, the City of Houston and Harris County have submitted proposed projects and comments to be taken into consideration. I have attached these letters for reference. At the public hearing on December 11, 2019, I offered specific comments regarding the draft version of the State Action Plan related to proportionality

Council Members: Amy Peck Jerry Davis Abbie Kamin Carolyn Evans-Shabazz Dave Martin Tiffany Thomas Greg Travis Karla Cisneros  
Robert Gallegos Edward Pollard Martha Castex-Tatum Mike Knox David W. Robinson Michael Kubosh Letitia Plummer Sallie Alcorn

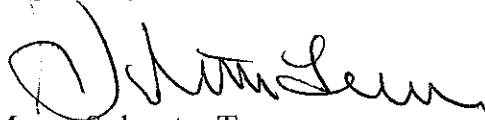
Controller: Chris B. Brown

and regional coordination. Chief Recovery Officer Stephen Costello also emphasized additional concerns related to specific program criteria.

After thorough review of the draft version of the State Action Plan, the City requests that a direct allocation method, based on damages, be utilized. Direct allocation would be consistent with the Congressional intent for the funds as well as the HUD CDBG-MIT notice. In the event that the State chooses to follow a different method of distribution, the City strongly recommends the technical changes proposed in the table attached (Table 1). The table expands on how the draft version can be revised to ensure an equitable and impactful distribution of funding that will help mitigate risk to the communities that need it most. The draft plan's allocation for the City of Houston is too small and the processes, as written, will be too slow to facilitate an expedited effort to increase resilience and mitigate against future storms. Given the proposed changes, the City will be able to enhance its efforts to protect people, reduce the risk of flooding, and further protect over \$1.3 billion in housing recovery investments made possible through the Community Development Block Grant – Disaster Recovery (CDBG-DR) funding.

I appreciate the opportunity to provide additional written comments and welcome the opportunity for a continued partnership with the Texas GLO and our regional partners.

Respectfully,

A handwritten signature in black ink, appearing to read "Sylvester Turner", written in a cursive style.

Mayor Sylvester Turner

Attachment A: Table 1 CDBG-MIT State Action Plan Comments

City of Houston  
 Comments to CDBG-MIT State Action Plan  
 January 2020

City of Houston -- CDBG-MIT State Action Plan Comments

Reference	Applicable to	Topic	Comment/Justification	Proposed Change/Recommendation
1	All programs	Proportionality	<p>At least half of the persons directly impacted by Hurricane Harvey are in Houston and Harris County, yet the amount of money made available to the region is too small to be considered proportional. The Executive Summary and Needs Assessment identify flooding as a major hazard in the State of Texas and the most common disaster in the last few years (2015 - 2019). Harris County (including Houston) is identified as the only county impacted consecutively by these disasters in 2015, 2016 and 2017. The proposed plan also indicates that the federal disaster declaration for Hurricane Harvey covers 32% of the State's population. Houston and Harris County represent 16.3% of the State's total population. In total, 44% or almost half of the persons directly impacted by Hurricane Harvey are in Houston and Harris County. The plan fails to make sufficient funding available to City of Houston and Harris County in a proportional manner consistent with such impacts. The State plan places limitations on Houston's eligibility for mitigation funds to a potential maximum of \$320 million out of \$4.3 billion (maximum of \$300 for Hurricane Harvey State Mitigation Competition and maximum of \$20 million for 2016 Floods State Mitigation Competition), which is less than 8%. The same logic applies to funding made available to Harris County. This amount does not reflect the intent of the bipartisan disaster relief appropriations for the proportional use of CDBG-MIT funding, which was specified in the Bipartisan Budget Act of 2018. It directed HUD to allocate no less than \$12 billion for mitigation activities PROPORTIONAL to the amounts that CDBG-DR grantees received for qualifying disasters in 2015, 2016 and 2017. The limited available funding for the areas that are mostly impacted hinders the City and Harris County's ability to continue to reduce the damages from future storms and protect the \$2 billion housing investments that are underway through the CDBG-DR 17 programs.</p>	<p>Revise all programs to ensure that the distribution is proportional to the impacts of Hurricane Harvey and previous storms for the areas that are highest at risk. The City of Houston recommends a similar distribution of funds that followed for the CDBG-DR 17 program or the HMGP program.</p>

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2	Pg. 209; 4.4.2 and Pg. 216; 4.4.3	2016 Floods State Mitigation Competition, Hurricane Harvey State Mitigation Competition	Regional Coordination	<p>The language in the Draft State Action Plan penalizes regional coordination. The Draft Plan states that "Each applicant may coordinate activities and submit a joint project that crosses jurisdictional boundaries. Each applicant may submit a total of 3 applications for the Hurricane Harvey State Mitigation Competition or 2 applications for the 2016 Floods State Mitigation Competition, whether they are applying as the lone applicant or jointly with another jurisdiction(s). Each application must consist of one project. Entities will be limited to a total of three applications for mitigation funding". This language indicates that if projects are submitted jointly, each entity is credited individually, which contradicts guidelines advocating for regional mitigation partnerships. The City of Houston and Harris County have submitted examples of watershed-level projects that demonstrate extensive coordination efforts. These are attached for reference (Attachments B and C). The proposed Harris County and City of Houston projects should serve as a model for how to maximize the flood risk reduction benefit for an entire watershed. Investment through these projects would not only help protect Texans currently at risk, but also further protect the \$2 billion investment in housing repair, rehabilitation, and reconstruction made possible through the CDBG-DR 17 Harvey recovery programs. It is also important to note that this level of coordination has also taken place for FEMA's Hazard Mitigation Grant Program, in which Harris County, Harris County Flood Control District, and City of Houston have been listed as partners and continue to work together to deliver projects funded through this program. In addition, the City is coordinating with Harris County Flood Control District on the programming of projects to be completed through the \$2.5 billion 2018 bond referendum and the City's \$6 billion Build Houston Forward reauthorization. These are examples that demonstrate that allowing entities to engage in partnership projects for more than the current maximum number of applications, without counting against the total number of applications for each entity, results in improved mitigation actions for the communities receiving the funds. If partnership projects are separated, or de-coupled, it can result in reduction of project efficiency and effectiveness. Multiple entities should be allowed to be listed as partners, without double-counting the application.</p> <p>Revise language on joint applications requirements to incentivize regional coordination. Do not limit joint applications which quantify additional benefits associated with next level investments. This is the type of coordinated investment required to truly mitigate risk. Alternatively, permit a primary applicant for the entire project to which the application is credited. Remove the double-counting of applications. Example language for Hurricane Harvey Mitigation Competition can be more specific as follows: "Each applicant may submit a total of 3 applications, where they are considered the LEAD agency. Applicants can be listed as partners in other applications to demonstrate the benefits of coordination, without counting against the total number of projects." The same applies to the 2016 Floods State Mitigation Competition.</p>
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3	Pg. 209; 4.4.2 and Pg. 216; 4.4.3	2016 Floods State Mitigation Competition, Hurricane Harvey State Mitigation Competition	Limit on Number of Projects	<p>Both the 2016 Floods and Hurricane Harvey programs specify a limit on the number of applications each entity can submit - maximum of 2 for the 2016 Floods State Mitigation Competition and a maximum of 3 for Hurricane Harvey State Mitigation Competition. This limitation does not reflect the proportionality intended under the statute for the use of these funds, in the areas mostly impacted by cited disasters. Placing a limitation on the number of projects that can be submitted hinders the ability of areas with the most documented risk to effectively address those risks.</p>	No limit on project applications should be set, rather a total amount to be received proportional to statutory citation and documented risk.
4	Pg. 209; 4.4.2 and Pg. 216; 4.4.3	2016 Floods State Mitigation Competition, Hurricane Harvey State Mitigation Competition	Award Amounts	<p>The maximum award amounts for each project under the 2015, 2016, and 2017 competitions should be larger to permit high-impact activities to mitigate risk and reduce future losses. The current programs for which the City of Houston is eligible place a maximum project limit of \$10 million for the 2016 program and \$100 million for the 2017 (Harvey) program. Many impactful mitigation projects, like the regional projects submitted by the City and County in the letter to the GLO in October and November 2019, far exceed the specified amounts. If regional projects are encouraged, the cap for projects should be increased to ensure maximum benefits to the region can be provided and risk can be mitigated.</p>	Eliminate the cap on the grant awards and award funds to the areas with the highest documented risk and highest quantified benefits.

<p>5 Pg. 5-189;  Section 2</p>	<p>Mitigation Needs  Assessment/Risk  Assessment</p>	<p>Risk Evaluation</p>
<p>The discussions in the Draft Plan for all storm events covered under the CDBG-MIT program do not present adequate detail about the impacts on the Houston region. Between 2016 and 2019, the Houston area experienced one 50-year storm (2016 Memorial Weekend), two 100-year storms (2016 Tax Day and 2019 Tropical Storm Imelda) and one 500-year storm (Hurricane Harvey). There is no other region in the State of Texas that must mitigate this type of frequent and economically impactful threats evidenced on page 10, 11, 18, and 19.</p> <ul style="list-style-type: none"> <li>• Economic losses for the Houston-Galveston Area Council for Hurricane Harvey were estimated at \$16 million in the first year after the storm (Texas Comptroller <a href="https://comptroller.texas.gov/economy/fiscal-notes/2018/special-edition/impact.php">https://comptroller.texas.gov/economy/fiscal-notes/2018/special-edition/impact.php</a>).</li> <li>• The Houston metro area received an average of 36 to 48 inches of rain between August 26<sup>th</sup> and 28<sup>th</sup>, 2017 during Hurricane Harvey, with a maximum of 51 inches in some areas. (<a href="https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf">https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf</a>; <a href="https://www.chron.com/news/houston-weather/hurricaneharvey/article/Harvey-Aftermath-Houston-police-officer-dies-19-12159139.php">https://www.chron.com/news/houston-weather/hurricaneharvey/article/Harvey-Aftermath-Houston-police-officer-dies-19-12159139.php</a>).</li> <li>• During Hurricane Harvey, 9 out of 19 official river gauges in Harris County recorded all-time high flood stages <a href="https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf">https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf</a>).</li> <li>• Over half (36 of 68) direct deaths caused by Hurricane Harvey were in the Houston metro area (<a href="https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf">https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf</a>).</li> </ul> <p>An updated version of the rainfall data (Atlas 14, Volume 11) was used to model and predict how frequently a specific flood event might reoccur and results were published by the National Oceanic and Atmospheric Administration (NOAA) last year. As the Texas Water Development Board noted in its 2019 Flood Report to the Legislature, “The data (referring to Atlas 14 data) showed that in areas with significant increases in estimated rainfall, flood risks are likely to be greater than previously thought.” Data for the Houston area indicates a 30% increase in estimated rainfall and flood risks are likely to be greater than previously thought. The storms listed in the State plan are historic. How risk is evaluated will need to take into account future conditions for mitigation and the Atlas 14 data. Future conditions need to be accounted for mitigation.</p>		

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6	Pg. 209; 4.4.2 and Pg. 216; 4.4.3	2016 Floods State Mitigation Competition, Hurricane Harvey State Mitigation Competition	Timing and Delays	<p>Not listing specific covered projects in the State Action Plan, such as those identified in the October and November 2019 letters to the GLO, will lead to future delays in the approval timeline and access to funding. For example, covered project applications will need to be reviewed, deemed eligible and incorporated as amendments to the Plan, creating further delays in recovery. A benefit cost analysis is also required under federal guidelines for such projects, creating additional delays. The draft guidelines state "depending on demand, no applicant will be awarded for their subsequent application until all successful eligible applicants have been awarded funding at least once". This will not only delay review and implementation of projects but calls into question the value and use of the risk assessment on which the draft plan is based on.</p>	<p>Applications should be reviewed and approved for the highest risk areas based on ranked quantified benefits. Covered projects should be included in the Plan, and not be incorporated later on as amendments. The City of Houston and Harris County have submitted a list of projects that would be eligible under the covered projects guidance that should be listed in the Plan to avoid any delays.</p>
7	Pg. 209; 4.4.2 and Pg. 216; 4.4.3	2016 Floods State Mitigation Competition, Hurricane Harvey State Mitigation Competition	Definition of a "project"	<p>Regional coordination is highlighted throughout the Draft Plan and expected, yet it is not incentivized as currently written. The guidelines state that a project must be viable as a stand-alone project. Harris County and the City have partnered to formulate watershed projects addressing flood damage reduction from bayou flooding and inadequate urban drainage. Without such collaboration, investment in drainage improvements will yield ineffective results.</p>	<p>Expand the definition of "project" to include components with independent utility which, when combined, provide greater cumulative benefits. Project phasing should also be considered and encouraged as larger projects may require a downstream/upstream component that, when combined, may result in optimal flood reduction benefit.</p>
8	All programs	All programs	Scoring Criteria/Point System	<p>The Draft Plan states that "more details on scoring criteria will be available in the application guidelines." The City of Houston supports the GLO's goal to develop a basis for selecting projects. However, the lack of specificity creates further uncertainty for applicants. In order to submit projects that have a high likelihood of being successful for funding, the scoring criteria and point system will need to be established beforehand in the State Action Plan. More detail needs to be provided to remove uncertainty and ensure more transparency in the project selection process.</p>	<p>The following recommendations (8a-8h) should be incorporated into the scoring criteria and point system.</p>
8a	All programs	All programs	Scoring Criteria/Point System	<p>Awarding a higher ranking, and thus more points, to projects in areas that are more susceptible to repetitive disasters ensures that funding is distributed to maximize benefit against risk.</p>	<p>Include a criterion that ranks applications based on impacts of repetitive disasters (of any kind).</p>
8b	All programs	All programs	Scoring Criteria/Point System	<p>Per HUD guidelines, the mitigation investment is not required to "tie-back" to a specific flood event. However, awarding more points to projects that can tie-back to the specific flood event will ensure that funding is directed to areas where the flooding occurred, which is the expectation of applicants and the general public.</p>	<p>Include a criterion that awards additional points to projects that tie-back to the associated flood event for each competition.</p>



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8c	All programs	All programs	<p>Prioritizing projects, particularly flood mitigation projects, that can demonstrate a positive economic impact in addition to human health and safety impacts ensures that funding is allocated to provide the most benefit in the highest risk areas. The new sub-criterion should include consideration for local, state and national economic impacts.</p> <p>The current sub-criteria penalize areas with less density or LMI areas, creating equity challenges in the implementation of flood risk reduction projects. There have been numerous studies, locally and nationally, addressing the equity effect of projects using similar criteria to evaluate the benefit/cost economics of a regional project. Underserved communities tend to be discounted due to such demographics being used to support project funding.</p> <p>The "Project Impact" criterion must include appropriate sub-criteria and corresponding points weighting such that the cumulative benefit of individual mitigation projects can be assessed on their own, as the types of benefits achieved by one project may not be the same as another, but the first project is in fact more beneficial overall when considering multiple factors.</p>	<p>Increase the maximum points allotted for the "Project Impact" criterion. This criterion should be revised to account for a more comprehensive assessment of the impacts of individual projects.</p> <ul style="list-style-type: none"> <li>• Add a sub-criterion that ranks and awards points to applications based on the economic impacts of the proposed project.</li> <li>• Remove "Costs per persons benefiting" sub-criterion. This proposed criterion penalizes areas with less density and LMI areas, creating equity challenges in the implementation of flood risk reduction projects.</li> <li>• Revise "percentage of persons benefiting within jurisdiction" sub-criteria to number of persons benefiting. Focusing on a percentage of population rather than totals, penalizes larger jurisdiction in which many residents may benefit from projects but represent only a small percentage of the jurisdiction's population.</li> <li>• Add a sub-criterion that ranks and awards points to applications that demonstrate a reduction in the number of flooded structures</li> </ul>
8d	All programs	All programs	<p>Requiring applicants to submit projects that are included in a local adopted plan can potentially generate supplanting issues, particularly for applicants that have also received a direct allocation of CDBG-MIT funds. Applicants should not be penalized for excluding such projects.</p>	<p>Remove the "Project Identified in Local Adopted Plan" criterion.</p>
8e	All programs	All programs	<p>Per Capita Market Value penalizes urban areas that have denser populations. While such areas have a greater per capita market value, this does not indicate that such areas are less at risk.</p>	<p>Remove the "Per Capita Market Value" criterion.</p>
8f	All programs	All programs	<p>The Social Vulnerability Index as currently identified in the Draft Plan is a composite number that measures social vulnerabilities of entire counties. Areas of high vulnerability within urbanized municipalities, including the City of Houston, correspond with low- and moderate-income areas and areas that are predominately minority, including Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs). This may not be consistent with the demographics of the counties as a whole, and may result in an increase in the SoVI of the non-county applicant. If SoVI is to be used as a criterion, project ranking should account for differences between the composite score of the entire county and the actual social vulnerability of the applicant.</p>	<p>The "Social Vulnerability Index" criterion must distinguish between city and other applicants, specifically for applicants that represent urbanized, non-county municipalities.</p>
8g	All programs	All programs	<p>All competitions require that projects meet the definition of mitigation activities to be eligible for funding, and the application guidelines should reflect this requirement. Applicants should be ranked based on the extent to which they are mitigating against future disasters and increase resiliency of their communities and infrastructure, with more</p>	<p>Increase the maximum points allotted under the "Mitigation/Resiliency Measures" criterion and include in all competitions.</p>

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<p>8h All programs</p>	<p>All programs</p>	<p>Scoring Criteria/Point System</p>	<p>The definition of this criterion, and the associated points awarded for sub-criteria, should not penalize applicants for previous efforts, as the CDBG-MIT activities are distinct and separate from previous CDBG programs and activities. Additionally, the sub-criteria should be designed such that applicants with prior or current CDBG contracts with GLO are not penalized at the expense of applicants who do not have such contracts. Indeed, having prior or current CDBG contracts may be indicative that a greater financial need for mitigation and resiliency.</p>	<p>The "Management Capacity" criterion and its sub-criteria need to be properly and fully defined.</p>
<p>9 Pg. 231; 4.4.5</p>	<p>HMGp program</p>	<p>FEMA requirements vs. HUD requirements</p>	<p>Original HMGp applications do not consider or incorporate information regarding HUD MID areas or other specific LMI criteria associated with HUD CDBG programs. HMGp projects and the required Benefit Cost Analysis (BCA) present issues with equity, as it benefits reduction in areas with higher property values. The plan should allow for subgrantees to provide additional information on the HMGp applications to both TDEM and the GLO related to the associated criteria for the other programs. This will ensure that the projects that advance the goals of the program actually receive the funding.</p>	<p>Allow for additional information to be submitted related to the HMGp applications for TDEM to consider. This additional information should complement the requirements set for HUD funding, which highlight social vulnerability, low-moderate income areas, that typically not considered in FEMA's benefit cost analysis and program objectives.</p>
<p>10 Pg. 224; 4.4.5</p>	<p>Regional Mitigation Program (HGAC Allocation)</p>	<p>Timeframe</p>	<p>The County will also receive a proportion of the Method of Distribution (MOD) calculation to be prepared by HGAC; however, the amount made available to the MOD process for the HGAC region is only \$190M for the MID cities and counties within the 13 county HGAC region. There is no deadline specified for the COGs to develop the plans for distributing funds, which can be a cause of concern considering the total program is expected to be completed within a 6-year timeframe.</p>	<p>Specify a deadline for COGs to develop plan for fund distribution amongst potential recipients.</p>
<p>11 Pg. 256; 4.4.10</p>	<p>Resilient Communities Program</p>	<p>Program Requirements</p>	<p>The Resilient Communities Program is appreciated, and its expansion is encouraged. The timeframe provided for program requirements, for all programs (building codes, flood damage prevention ordinance, zoning ordinance, land use plans, and comprehensive plans) indicates that adoption of selected building code must be complete within 12-24 months of grant award. Building codes, flood prevention ordinances, and zoning ordinances are each 12 months, and land use plans are 18 months and comprehensive plans are 24 months. Public service activities to improve the Community Rating System (CRS) do not seem to have a timeframe. However, the proposed timeframe for the Program is 5.5 years. This timing is inconsistent and unrealistic considering that each of these processes requires extensive review and comprehensive stakeholder engagement in order to achieve consensus building in the community, particularly for larger jurisdictions</p>	<p>Modify timing for implementation, completion and adoption of plans and studies related to the Resilient Communities Program to all be 24 months minimum and realistically 36 months, which is well within the program's 5.5 year period</p>

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12	Pg. 261; 4.4.11	Regional and State Planning	Program Amount	The amount for planning set forth in the program is too high (over 8% of the total allocation), especially when coupled with the planning amounts the State allocated in recent CDBG-DR allocations in 2015, 2016, and 2017, totaling over \$145 million for planning activities. Funding should be made available for specific mitigation projects that will help reduce the risks that Texans face more immediately. Additional planning efforts without a funding source identified for implementation seems to be counter-productive to the goals of the program.	The planning allocation should be a similar to recent CDBG-DR allocations, between 2-4% of the allocation. The GLO should redistribute at least \$150 million of planning funds for additional projects within the Hurricane Harvey State Mitigation Competition.
13	Pg. 238; 4.4.6	Coastal Resiliency Program	Allocation amount; Eligible areas	There is a typo in 4.4.6.2 ii which is unclear if this is a requirement or not. Is it "must" or "may"? The current Draft Plan discusses the Texas Coastal Resiliency Master Plan. This does not allow for additional projects to be eligible under the Coastal Resiliency program. The Coastal Resiliency Master Plan does not incorporate any part of the entirety of the City of Houston and is not inclusive of the entire region that supports the Texas Coast. This proposed program is based on an ongoing plan which has not been finalized.	Edit typo to provide clarity on 4.4.6.2 ii. Expand eligibility beyond the projects listed in the Texas Coastal Resiliency Master Plan and give consideration to other projects that could greatly improve Coastal Resilience.
14	Pg. 243; 4.4.7	Housing Oversubscription Supplemental	Program Amount	\$400 million is proposed as supplemental for the State's housing repair and reconstruction program for which the City of Houston is not eligible. The intent of the HUD CDBG-MIT is for mitigation activities. It is recommended that mitigation programs are prioritized over programs to repair existing structures.	Allocate funding for mitigation activities that are in line with intent of HUD CDBG-MIT program. Allow the City of Houston or its residents to be eligible to receive this funding.
16	All programs	All programs	Line of Credit	Approval of the City of Houston and Harris County request in the State Action Plan of providing a line of creditor advance funding for project delivery. The rationale being due to the large amount of funding required for the design and construction of the infrastructure projects puts an additional strain where we already have limited resources.	Provide line of credit for program implementation.
17	Pg. 209; 4.4.2	2016 Floods State Mitigation Competition	Application time period	The time period for the 2016 Floods State Mitigation Competition of 4 years is too short and should be extended to 10 years. This is because infrastructure projects require proper time for design and construction. Additional timing needs to be provided for procurement of services.	Extend timeline for 2016 Floods State Mitigation Competition to 10 years.
18	All programs	All programs	Cultural and Historic Preservation	The importance for preservation and protection of cultural resources is not included in the Draft Plan. Draft Plan will need to include the value of protecting Texas culture, the arts, and historic assets that are essential in creating resilient communities.	Explicitly include language that encourages the inclusion of cultural and historic assets as critical infrastructure in project criteria as well as planning efforts.

Attachment B: City of Houston and Harris County Joint Letter



LINA HIDALGO



Mayor Sylvester Turner

October 18, 2019

The Honorable George P. Bush  
Commissioner  
Texas General Land Office  
1700 N. Congress Avenue  
Austin, Texas 78701

Dear Commissioner Bush:

The City of Houston and Harris County are looking forward to the continued partnership with the Texas General Land Office for the recovery efforts from 2015, 2016, and 2017 disasters. The Community Development Block Grant – Mitigation (CDBG-MIT) funding offers the opportunity to go beyond recovery and increase resilience by mitigating the risks and threats that communities continue to face. With hundreds of thousands of households impacted by Hurricane Harvey in the City of Houston and Harris County, incorporating resilience into recovery projects is essential for the State of Texas to continue to thrive.

As required by the August 30, 2019 Federal Register notice, the City of Houston will proceed with creating a separate local action plan that identifies mitigation strategies for the 2015 CDBG-MIT direct allocation (disaster numbers 4223 and 4245). However, the cumulative needs for the Houston region associated with subsequent storm events covered by the notice and the threat posed by continued repetitive historic storm events, exceed the \$61.8 million dollars provided directly to the City by HUD. The Harris County Flood Control District alone has needs extending beyond \$25 billion to mitigate the continuing and substantial flood risk that threatens the Houston and Harris County region. The Tax Day flood in 2016, Hurricane Harvey in 2017, and Tropical Storm Imelda last month, illustrate that more investments are required to protect Houstonians' and Harris County residents' lives and property from the ongoing threat of flooding.

After participating via the internet in the September 26<sup>th</sup> and October 2<sup>nd</sup> public hearings, the City of Houston and Harris County offer the following comments as the State action plan is drafted.


- Request for the GLO to adopt a CDBG-MIT award system based on risk. For flooding, in particular, risk is a function of increased rainfall intensity documented in Atlas 14 and the frequency of historic rainfall events as well as population and economic activity potentially impacted. Houston and Harris County have experienced one 50-year storm event, two 100-year storm events and one 500-year storm event since April 2016. There is no other region in the State of Texas that has to mitigate for this type of frequent and economically impactful threat pattern.
- The City of Houston and Harris County submit the regional stormwater infrastructure investments depicted in Appendix 1 for consideration. This regional investment depicts a combination of Harris County housing projects, Harris County Flood Control District and City locally funded infrastructure projects, and those eligible for CDBG-MIT funding. These CBDG-MIT eligible projects are coordinated regionally with Harris County and will provide long-term flood risk reduction for densely populated regions. They have been identified based on criteria specified in the Federal Register notice and address flooding issues within the most impacted and distressed regions across all watersheds in the County and City, many of them low and moderate income. Additionally, as some of these projects may be defined as “covered projects” according to the Federal Register notice, it is essential that such projects be included in the Action Plan to avoid the delay of submitting Action Plan amendments for such projects.
- The large amount of funding required for the design and construction of infrastructure projects puts additional strain on jurisdictions that already have limited resources. The City of Houston and Harris County request the Texas Action Plan provide a line of credit or advance funding for project delivery.

The City of Houston and Harris County respectfully request a meeting with the GLO to discuss the regional projects listed in Appendix 1 and clarify how they fit within the State Action Plan and its requirements to mitigate threats that continuously impact Texans. It bears repeating that the region has experienced one 50-year storm event, two 100-year storm events and one 500-year storm event since April 2016. The 4.6 million persons, thousands of manufacturing businesses and 22 Fortune 500 companies that call Houston and Harris County home will appreciate your attention to this record of repetitive threats associated with increased rainfall intensity and the mitigation required to sustain the economic engine of Texas.

Sincerely,



Lina Hidalgo  
County Judge



Sylvester Turner  
Mayor

Proposed Regional Interagency CDBG-MIT Projects  
 Harris County Flood Control District / Harris County / City of Houston  
 Revised 10/21/2019



Project Totals by Agency			
	Total	CDBG-MIT	Local
HCFCFD	\$ 784,100,000.00	\$ 633,590,000.00	\$ 150,510,000.00
HC	\$ 277,858,000.00	\$ 222,286,400.00	\$ 55,571,600.00
COH	\$ 2,089,191,073.00	\$ 1,920,386,629.00	\$ 168,804,444.00
<b>Total</b>	<b>\$ 3,151,149,073.00</b>	<b>\$ 2,776,263,029.00</b>	<b>\$ 374,886,044.00</b>

Watershed			
	Total	Partner	Local
Brays Bayou	\$ 1,381,775,590.00	\$ 1,258,215,326.00	\$ 123,560,264.00
Greens Bayou	\$ 253,843,000.00	\$ 209,684,400.00	\$ 44,158,600.00
Halls Bayou	\$ 541,389,756.00	\$ 462,633,030.00	\$ 78,756,726.00
Hunting Bayou	\$ 192,496,747.00	\$ 192,496,747.00	\$ -
Sims Bayou	\$ 561,364,599.00	\$ 481,616,607.00	\$ 79,747,992.00
White Oak Bayou	\$ 220,279,381.00	\$ 171,616,919.00	\$ 48,662,462.00
<b>Total</b>	<b>\$ 3,151,149,073.00</b>	<b>\$ 2,776,263,029.00</b>	<b>\$ 374,886,044.00</b>

Sims Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 167,000,000.00	\$ 120,750,000.00	\$ 46,250,000.00
HC	\$ 710,000.00	\$ 568,000.00	\$ 142,000.00
COH	\$ 393,654,599.00	\$ 360,298,607.00	\$ 33,355,992.00
<b>Total</b>	<b>\$ 561,364,599.00</b>	<b>\$ 481,616,607.00</b>	<b>\$ 79,747,992.00</b>

White Oak Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 98,000,000.00	\$ 89,250,000.00	\$ 8,750,000.00
HC	\$ 45,965,000.00	\$ 36,772,000.00	\$ 9,193,000.00
COH	\$ 76,314,381.00	\$ 45,594,919.00	\$ 30,719,462.00
<b>Total</b>	<b>\$ 220,279,381.00</b>	<b>\$ 171,616,919.00</b>	<b>\$ 48,662,462.00</b>

Greens Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 58,100,000.00	\$ 53,090,000.00	\$ 5,010,000.00
HC	\$ 195,743,000.00	\$ 156,594,400.00	\$ 39,148,600.00
COH	\$ -	\$ -	\$ -
<b>Total</b>	<b>\$ 253,843,000.00</b>	<b>\$ 209,684,400.00</b>	<b>\$ 44,158,600.00</b>

Brays Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 123,000,000.00	\$ 100,500,000.00	\$ 22,500,000.00
HC	\$ -	\$ -	\$ -
COH	\$ 1,258,775,590.00	\$ 1,157,715,326.00	\$ 101,060,264.00
<b>Total</b>	<b>\$ 1,381,775,590.00</b>	<b>\$ 1,258,215,326.00</b>	<b>\$ 123,560,264.00</b>

Hunting Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
HC	\$ -	\$ -	\$ -
COH	\$ 182,496,747.00	\$ 182,496,747.00	\$ -
<b>Total</b>	<b>\$ 192,496,747.00</b>	<b>\$ 192,496,747.00</b>	<b>\$ -</b>

Halls Bayou			
	Total	CDBG-MIT	Local
HCFCFD	\$ 328,000,000.00	\$ 260,000,000.00	\$ 68,000,000.00
HC	\$ 35,440,000.00	\$ 28,352,000.00	\$ 7,088,000.00
COH	\$ 177,949,756.00	\$ 174,281,030.00	\$ 3,668,726.00
<b>Total</b>	<b>\$ 541,389,756.00</b>	<b>\$ 462,633,030.00</b>	<b>\$ 78,756,726.00</b>

Proposed Regional Interagency CDBG-MIT Projects  
Harris County Flood Control District / Harris County / City of Houston  
Revised 10/21/2019



Agency	ID	Watershed	Project Title	Political Jurisdiction	Total Cost	CDBG-MIT	Local Share
COH	Brays Mid-Reach	Brays Bayou	Westbury Area		\$ 275,679,362.00	\$ 253,966,782.00	\$ 21,712,580.00
COH	Brays Mid-Reach	Brays Bayou	Meyerland Area		\$ 220,781,916.00	\$ 220,781,916.00	\$ -
COH	Brays Mid-Reach	Brays Bayou	Willowland		\$ 201,299,482.00	\$ 201,299,482.00	\$ -
COH	Brays Mid-Reach	Brays Bayou	Sharpstown Area and Richmond Plaza		\$ 206,695,061.00	\$ 180,430,995.00	\$ 26,264,066.00
COH	Keegans	Brays Bayou	Braeburn Valley West		\$ 104,727,014.00	\$ 104,727,014.00	\$ -
COH	Brays Mid-Reach	Brays Bayou	Fondren, US 59 to W. Airport		\$ 84,858,937.00	\$ 56,096,199.00	\$ 28,762,738.00
COH	Keegans	Brays Bayou	Brays Oaks		\$ 51,352,571.00	\$ 51,352,571.00	\$ -
COH	Brays Mid-Reach	Brays Bayou	Harwin, Fondren Rd to US 59		\$ 38,029,547.00	\$ 38,029,547.00	\$ -
HCFC	F-07	Brays Bayou	Planning, Right-Of-Way Acquisition, Design, and Construction of Channel Conveyance Improvements on Keegans Bayou	1	\$ 32,500,000.00	\$ 32,500,000.00	\$ -
COH	Keegans	Brays Bayou	Huntington Village		\$ 51,394,925.00	\$ 32,127,696.00	\$ 19,267,229.00
HCFC	F-08	Brays Bayou	Right-Of-Way Acquisition, Design, and Construction of Channel Conveyance Improvements on Fondren Diversion Channel	1	\$ 30,500,000.00	\$ 30,500,000.00	\$ -
HCFC	CI-038	Brays Bayou	Restore Channel Conveyance Capacity Along D115-00-00	2	\$ 30,000,000.00	\$ 15,000,000.00	\$ 15,000,000.00
HCFC	C-13	Brays Bayou	Right-Of-Way, Design and Construction of Conveyance Improvements along Binliff Ditch	3	\$ 30,000,000.00	\$ 22,500,000.00	\$ 7,500,000.00
COH	Keegans	Brays Bayou	W. Bellfort, Dairy Ashford to US 59		\$ 23,956,775.00	\$ 18,903,124.00	\$ 5,053,651.00
HC	E-09	Greens Bayou	Pine Trails		\$ 38,620,000.00	\$ 30,896,000.00	\$ 7,724,000.00
HC	E-09	Greens Bayou	Houmont Park		\$ 34,185,000.00	\$ 27,348,000.00	\$ 6,837,000.00
HCFC	C-20	Greens Bayou	Mid-Reach Greens Bayou Project - Design and Construction of Channel Conveyance Improvements along Greens Bayou	1 & 2	\$ 20,000,000.00	\$ 18,000,000.00	\$ 2,000,000.00
HC	E-09	Greens Bayou	Humble Road Place		\$ 17,400,000.00	\$ 13,920,000.00	\$ 3,480,000.00
HCFC	C-33	Greens Bayou	Design and Construction of Aldine-Westfield Stormwater Detention Basin Improvements	1	\$ 15,100,000.00	\$ 13,590,000.00	\$ 1,510,000.00
HCFC	C-32	Greens Bayou	Design and Construction of the Cutten Road Basin	4	\$ 15,000,000.00	\$ 13,500,000.00	\$ 1,500,000.00
HC	E-09	Greens Bayou	Beaumont Place Ph 2	1	\$ 12,488,000.00	\$ 9,990,400.00	\$ 2,497,600.00
HC	E-09	Greens Bayou	North Forest	1	\$ 12,231,000.00	\$ 9,784,800.00	\$ 2,446,200.00
HC	E-09	Greens Bayou	Parkway Forest	1	\$ 11,530,000.00	\$ 9,224,000.00	\$ 2,306,000.00
HC	E-09	Greens Bayou	Castlewood Addition Secs 3 and 4	2	\$ 10,302,000.00	\$ 8,241,600.00	\$ 2,060,400.00
HC	E-09	Greens Bayou	Parkland Estates	1	\$ 8,697,000.00	\$ 6,957,600.00	\$ 1,739,400.00
HC	E-09	Greens Bayou	Beaumont Place Ph 1 (CDBG-DR Round 1)	1	\$ 6,612,000.00	\$ 5,289,600.00	\$ 1,322,400.00
HC	E-09	Greens Bayou	Parkway (Mobile Homes)	1	\$ 6,602,000.00	\$ 5,281,600.00	\$ 1,320,400.00
HC	E-09	Greens Bayou	Kingslake Forest	1	\$ 6,600,000.00	\$ 5,280,000.00	\$ 1,320,000.00
HC	E-09	Greens Bayou	Western Homes Addition	2	\$ 5,747,000.00	\$ 4,597,600.00	\$ 1,149,400.00
HC	E-09	Greens Bayou	Hidden Meadow	1	\$ 5,320,000.00	\$ 4,256,000.00	\$ 1,064,000.00
HCFC	C-43	Greens Bayou	Potential CDBG-DR (2017) - Planning, Right-of-Way Acquisition, Design and Construction of Channel Conveyance Improvements along P138-01-01	2	\$ 5,000,000.00	\$ 5,000,000.00	\$ -
HC	E-09	Greens Bayou	High Meadows and Fairgreen	2	\$ 3,650,000.00	\$ 2,920,000.00	\$ 730,000.00
HC	E-09	Greens Bayou	Ralston Acres	1	\$ 3,635,000.00	\$ 2,908,000.00	\$ 727,000.00
HCFC	CI-022	Greens Bayou	ROW, Design, and Construction of Stormwater Detention Basin Near P130-05	1	\$ 3,000,000.00	\$ 3,000,000.00	\$ -
HC	E-09	Greens Bayou	Fallbrook, Ridgepoint, and Westpoint (PCT1)	1	\$ 2,976,000.00	\$ 2,380,800.00	\$ 595,200.00
HC	E-09	Greens Bayou	Fallbrook, Ridgepoint, and Westpoint (PCT4)	4	\$ 2,976,000.00	\$ 2,380,800.00	\$ 595,200.00
HC	E-09	Greens Bayou	Evergreen Villas	1	\$ 2,520,000.00	\$ 2,016,000.00	\$ 504,000.00
HC	E-09	Greens Bayou	Fountainview	1	\$ 2,210,000.00	\$ 1,768,000.00	\$ 442,000.00
HC	E-09	Greens Bayou	Fountainhead Sec 2	4	\$ 1,140,000.00	\$ 912,000.00	\$ 228,000.00
HC	E-09	Greens Bayou	Sierra Ranch and Stonfield Terrace Sec 3	1	\$ 302,000.00	\$ 241,600.00	\$ 60,400.00



Proposed Regional Interagency CDBG-MIT Projects  
Harris County Flood Control District / Harris County / City of Houston  
Revised 10/21/2019



Agency	ID	Watershed	Project Title	Political Jurisdiction	Total Cost	CDBG-MIT	Local Share
HCFC	C-41	Halls Bayou	Design and Construction of Corps of Engineers Halls Bayou Flood Risk Management Project	1, 2, & 4	\$ 200,000,000.00	\$ 150,000,000.00	\$ 50,000,000.00
COH	Halls Bayou	Halls Bayou	Chatwood Place		\$ 83,722,274.00	\$ 83,722,274.00	\$ -
COH	Halls Bayou	Halls Bayou	Aldine Westfield (N), BW 8 to Aldine Mail Rd		\$ 48,861,514.00	\$ 48,861,514.00	\$ -
HCFC	C-23	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-08-00	1, 2, & 4	\$ 25,000,000.00	\$ 22,500,000.00	\$ 2,500,000.00
COH	Halls Bayou	Halls Bayou	Pinewood Village (N) and Melrose Park		\$ 23,026,927.00	\$ 19,358,201.00	\$ 3,668,726.00
HCFC	C-28	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-25-00	2	\$ 18,000,000.00	\$ 16,200,000.00	\$ 1,800,000.00
HCFC	C-26	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-23-00	1	\$ 16,000,000.00	\$ 14,400,000.00	\$ 1,600,000.00
HC	E-09	Halls Bayou	Aldine Village	2	\$ 14,500,000.00	\$ 11,600,000.00	\$ 2,900,000.00
HCFC	C-25	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-21-00	2	\$ 14,000,000.00	\$ 12,600,000.00	\$ 1,400,000.00
COH	Halls Bayou	Halls Bayou	Pinewood Village Area 2 (S)		\$ 12,133,851.00	\$ 12,133,851.00	\$ -
HCFC	C-30	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-27-00	1	\$ 12,000,000.00	\$ 10,800,000.00	\$ 1,200,000.00
HCFC	C-24	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-09-00	1	\$ 12,000,000.00	\$ 10,800,000.00	\$ 1,200,000.00
HCFC	C-27	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-23-02	1	\$ 12,000,000.00	\$ 10,800,000.00	\$ 1,200,000.00
COH	Halls Bayou	Halls Bayou	Aldine Westfield (S), Pine Tree Dr to Aldine Mail		\$ 10,205,190.00	\$ 10,205,190.00	\$ -
HCFC	CI-006	Halls Bayou	Design and Construction of a Stormwater Detention Basin in Brook Park	1	\$ 10,000,000.00	\$ 5,000,000.00	\$ 5,000,000.00
HC	E-09	Halls Bayou	Oak Glen Place	1&2	\$ 8,400,000.00	\$ 6,720,000.00	\$ 1,680,000.00
HC	E-09	Halls Bayou	Northfield Place	1	\$ 7,200,000.00	\$ 5,760,000.00	\$ 1,440,000.00
HCFC	C-29	Halls Bayou	Right-Of-Way, Design, and Construction of Channel Conveyance Improvements on P118-25-01	2	\$ 6,000,000.00	\$ 5,400,000.00	\$ 600,000.00
HC	E-09	Halls Bayou	Airline Estates and Blue Bell		\$ 5,340,000.00	\$ 4,272,000.00	\$ 1,068,000.00
HCFC	C-21	Halls Bayou	Local Cost Share for Corps of Engineers Halls Bayou Study	1, 2, & 4	\$ 3,000,000.00	\$ 1,500,000.00	\$ 1,500,000.00
COH	Hunting Bayou	Hunting Bayou	Kashmere Gardens		\$ 93,008,249.00	\$ 93,008,249.00	\$ -
COH	Hunting Bayou	Hunting Bayou	Camden Woods		\$ 41,711,167.00	\$ 41,711,167.00	\$ -
COH	Hunting Bayou	Hunting Bayou	Pleasantville and Glendale		\$ 23,101,129.00	\$ 23,101,129.00	\$ -
COH	Hunting Bayou	Hunting Bayou	Gallhorn, IH 10 to Loop 610		\$ 12,889,631.00	\$ 12,889,631.00	\$ -
COH	Hunting Bayou	Hunting Bayou	Wood Shadows/Holiday Forest		\$ 11,786,571.00	\$ 11,786,571.00	\$ -
HCFC	CI-59	Hunting Bayou	Planning, Right-Of-Way, Design and Construction of a Diversion Channel from H102-00-00 to H100-00-00 through Galena Park	2	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
COH	Saltwater Ditch	Sims Bayou	South Park (S)		\$ 153,776,521.00	\$ 153,776,521.00	\$ -
COH	Saltwater Ditch	Sims Bayou	Belfort Park, Edgewood Terrace (S of South Park)		\$ 53,095,509.00	\$ 53,095,509.00	\$ -
COH	Saltwater Ditch	Sims Bayou	South Park (N)		\$ 52,863,200.00	\$ 52,863,200.00	\$ -
HCFC	C-08	Sims Bayou	Right-Of-Way Acquisition, Design, and Construction of Stormwater Detention Basin and Channel Conveyance Improvements along Salt Water Ditch	1	\$ 50,000,000.00	\$ 37,500,000.00	\$ 12,500,000.00
COH	Saltwater Ditch	Sims Bayou	MLK Blvd, Belfort to Airport		\$ 43,015,321.00	\$ 43,015,321.00	\$ -
HCFC	CI-029	Sims Bayou	Restore Channel Conveyance Capacity Along C102-00-00	2	\$ 30,000,000.00	\$ 15,000,000.00	\$ 15,000,000.00
HCFC	CI-037	Sims Bayou	Restore Channel Conveyance Capacity Along C148-00-00	2	\$ 30,000,000.00	\$ 15,000,000.00	\$ 15,000,000.00
COH	Berry Bayou	Sims Bayou	Gulfway Terrace Area (S)		\$ 22,900,530.00	\$ 22,900,530.00	\$ -
COH	Berry Bayou	Sims Bayou	Freeway/Manor Area		\$ 51,467,175.00	\$ 18,111,163.00	\$ 33,355,992.00

Proposed Regional Interagency CDBG-MIT Projects  
 Harris County Flood Control District / Harris County / City of Houston  
 Revised 10/21/2019



Agency	ID	Watershed	Project Title	Political Jurisdiction	Total Cost	CDBG-MIT	Local Share
COH	Berry Bayou	Sims Bayou	Guifway Terrace Area (N)		\$ 16,536,343.00	\$ 16,536,343.00	\$ -
HCFC	C-10	Sims Bayou	Design and Construction of C506-01-00-E003	2	\$ 15,000,000.00	\$ 11,250,000.00	\$ 3,750,000.00
HCFC	F-92	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C116-00-00	1	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
HCFC	F-93	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C124-00-00	1	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
HCFC	F-94	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C143-00-00	1	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
HCFC	F-95	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C144-00-00	1	\$ 10,000,000.00	\$ 10,000,000.00	\$ -
HCFC	Cl-027	Sims Bayou	Planning, Right-Of-Way Acquisition, Design, and Construction of Improvements for the Tributaries of C106-00-00	2	\$ 2,000,000.00	\$ 2,000,000.00	\$ -
HC	E-15	Sims Bayou	Skeetville	1	\$ 710,000.00	\$ 568,000.00	\$ 142,000.00
HCFC	F-10	White Oak Bayou	Right-Of-Way Acquisition, Design, and Construction of Channel Conveyance Improvements on Brickhouse Gully	4	\$ 35,000,000.00	\$ 35,000,000.00	\$ -
HCFC	C-16	White Oak Bayou	Design and Construction of Woodland Trails Stormwater Detention Basin	4	\$ 31,000,000.00	\$ 23,250,000.00	\$ 7,750,000.00
HCFC	F-09	White Oak Bayou	Planning, Right-Of-Way Acquisition, Design and Construction of Little White Oak Bayou Channel Conveyance Improvements	1 & 2	\$ 30,000,000.00	\$ 30,000,000.00	\$ -
COH	Inwood	White Oak Bayou	Chateau Forest (E)		\$ 22,242,001.00	\$ 22,242,001.00	\$ -
HC	E-17	White Oak Bayou	Worthington Estates	3	\$ 13,600,000.00	\$ 10,880,000.00	\$ 2,720,000.00
COH	Inwood	White Oak Bayou	Inwood Forest Area		\$ 27,766,100.00	\$ 12,055,032.00	\$ 15,711,068.00
HC	E-17	White Oak Bayou	Tower Oaks Meadows	3	\$ 11,300,000.00	\$ 9,040,000.00	\$ 2,260,000.00
COH	Inwood	White Oak Bayou	Chateau Forest Area 2 (W)		\$ 26,306,280.00	\$ 11,297,886.00	\$ 15,008,394.00
HC	E-17	White Oak Bayou	Barwood	3	\$ 6,900,000.00	\$ 5,520,000.00	\$ 1,380,000.00
HC	E-17	White Oak Bayou	Bernadine Estates & Tower Oaks Sec 3	3	\$ 6,645,000.00	\$ 5,316,000.00	\$ 1,329,000.00
HC	E-17	White Oak Bayou	Kolbe Road & Related Infrastructure	3	\$ 4,700,000.00	\$ 3,760,000.00	\$ 940,000.00
HCFC	Cl-033	White Oak Bayou	Partnership Project with City of Houston on Planning, Right-of-Way Acquisition, Design, and Construction of General Drainage Improvements along E105-00-00	4	\$ 2,000,000.00	\$ 1,000,000.00	\$ 1,000,000.00
HC	E-17	White Oak Bayou	Westgate U/R	3	\$ 1,694,000.00	\$ 1,355,200.00	\$ 338,800.00
HC	E-17	White Oak Bayou	Ravensway South	3	\$ 1,126,000.00	\$ 900,800.00	\$ 225,200.00
			Total		\$ 3,151,149,073.00	\$ 2,776,263,029.00	\$ 374,886,044.00

Attachment C: City of Houston Chief Recovery Officer Letter, proposed joint mitigation projects



# CITY OF HOUSTON

Chief Recovery Officer

Sylvester Turner

Mayor

Stephen C. Costello, P.E.  
Chief Recovery Officer  
P.O. Box 1562  
Houston, Texas 77251-1562

T. 832.393.1123  
[www.houstontx.gov](http://www.houstontx.gov)

November 19, 2019

Ms. Heather Lagrone  
Deputy Director  
Texas General Land Office  
1700 N. Congress Avenue  
Austin, Texas 78701

RE: CDBG-MIT

Dear Ms. Lagrone,

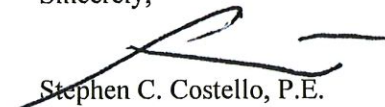
On October 18<sup>th</sup>, 2019, the City of Houston, in partnership with Harris County and the Harris County Flood Control District, submitted a set of projects to the Texas General Land Office for funding through the HUD CDBG-Mitigation program. The attached maps provide further depiction of proposed regional interagency CDBG-MIT projects which are consistent with federal requirements, addressing current and future risks in the most impacted and distressed areas of Texas. The projects shown are grouped by watershed to maximize regional flood risk reduction benefits in areas with high numbers of repetitive losses.

Following Hurricane Harvey, the City of Houston and Harris County were determined by the federal government to be most impacted and distressed areas. These regional watershed projects submitted to the state represent the most impacted and distressed areas that also meet federal income standards. Houston and Harris County have experienced one 50-year storm event, two 100-year storm events and one 500-year storm event since April 2016. There is no other region in the State of Texas that must mitigate for this type of frequent and damaging threat pattern.

The watersheds for which funding has been requested represent a fraction of the need throughout Houston and Harris County. It is the intent of the City of Houston to showcase the regional coordination projects highlighted in Appendix 1. If selected for the State Action Plan, these will lay the foundations for Houstonians to thrive. The City of Houston and partners welcome the opportunity to discuss these projects in detail.

For questions regarding the content attached, please contact [stephen.costello@houstontx.gov](mailto:stephen.costello@houstontx.gov)

Sincerely,

  
Stephen C. Costello, P.E.  
Chief Recovery Officer  
City of Houston

CC:

Mayor Sylvester Turner

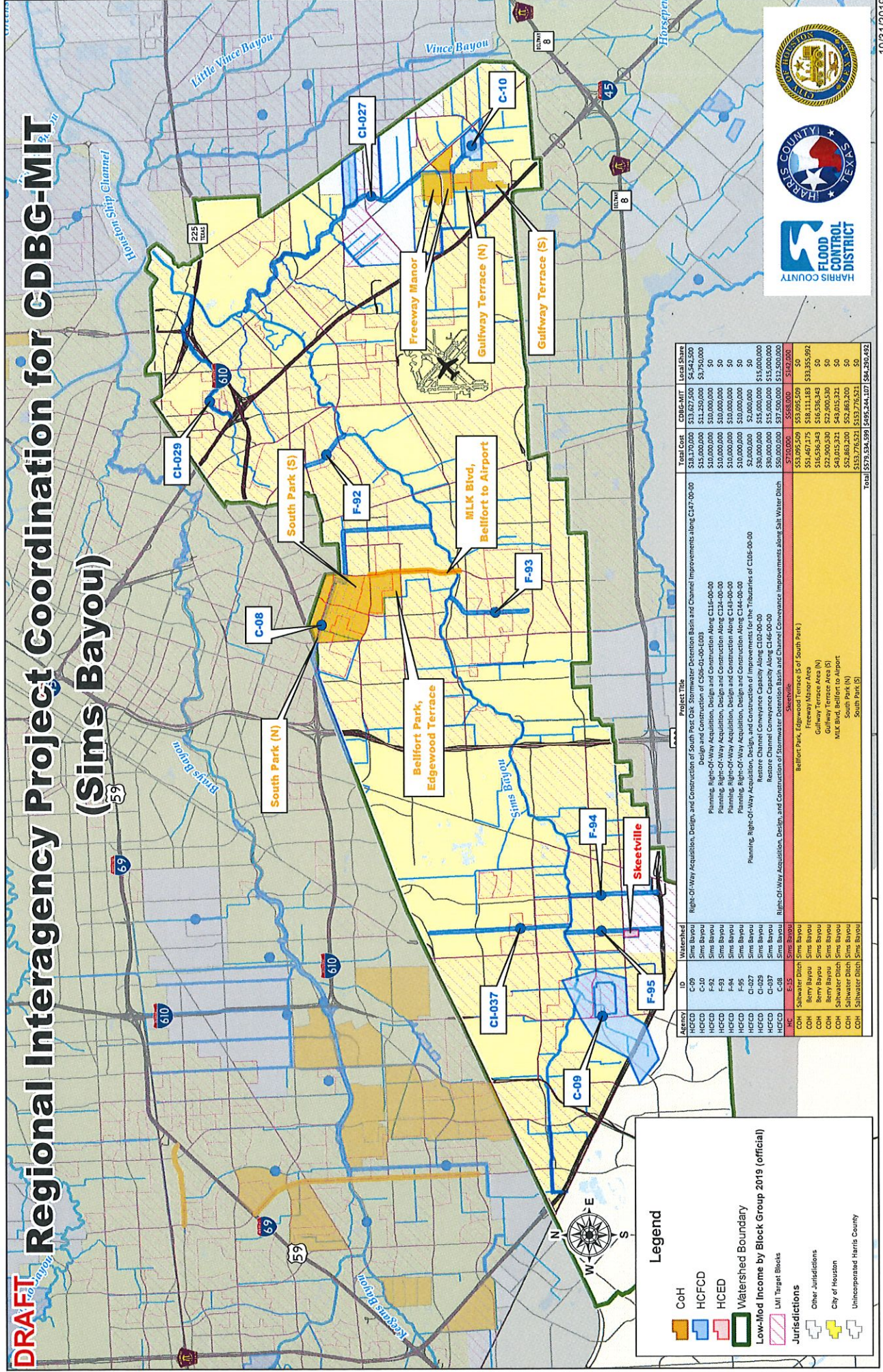
Judge Lina Hidalgo, Harris County

George P. Bush, General Land Office

Chief Nim W. Kidd, Texas Division of Emergency Management

Executive Director Russell Poppe, Harris County Flood Control District

# Regional Interagency Project Coordination for CDBG-MIT (Sims Bayou)



**Legend**

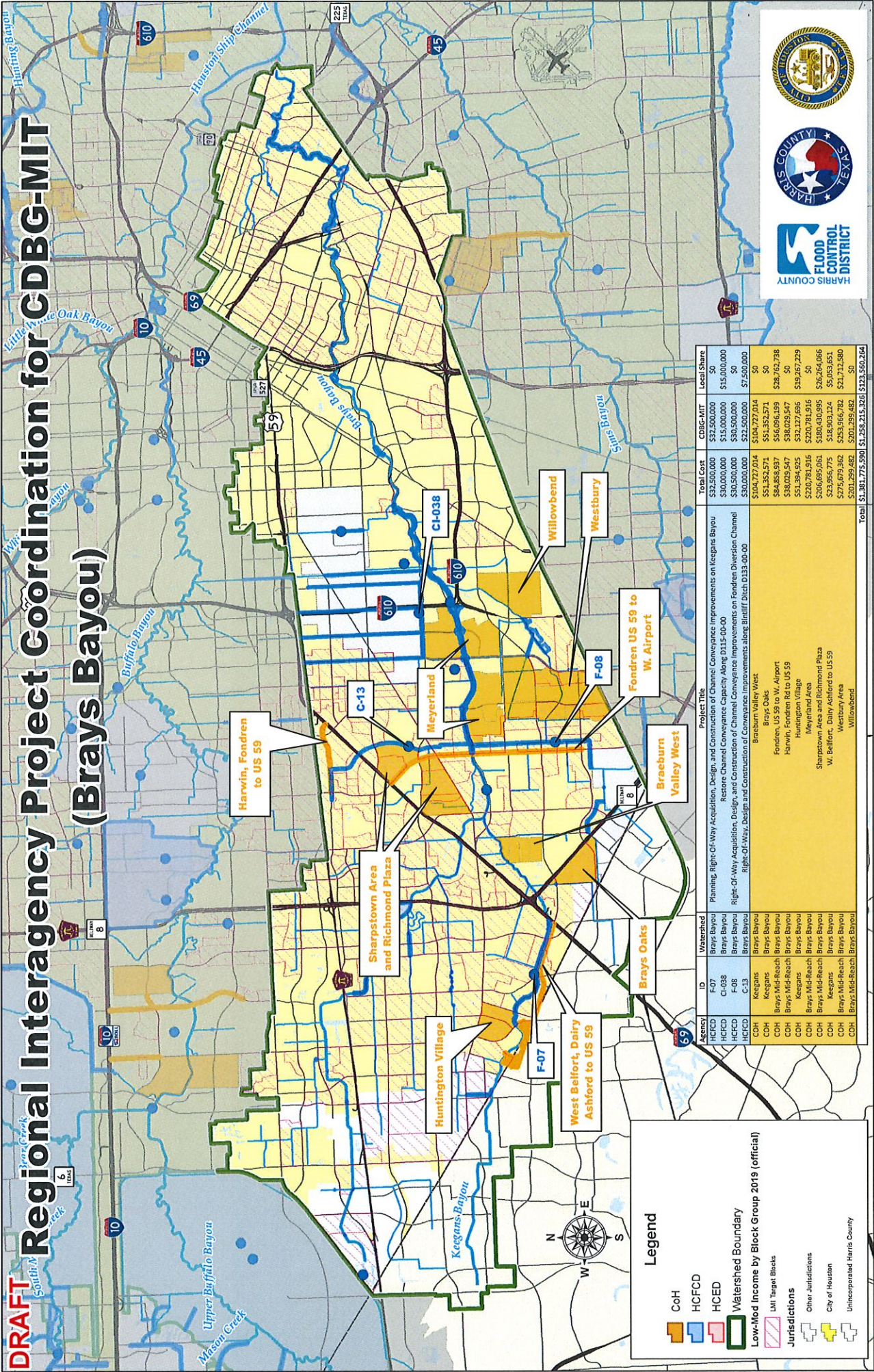
- COH
- HCFC
- HCED
- Watershed Boundary
- Low-Moderate Income by Block Group 2019 (official)
- LMU Target Blocks
- Jurisdictions
  - Other Jurisdictions
  - City of Houston
  - Unincorporated Harris County

Agency	ID	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
HCFC	C-09	Sims Bayou	Right-Of-Way Acquisition, Design, and Construction of South Post Oak Stormwater Detention Basin and Channel Improvements Along C147-00-00	\$18,370,000	\$13,827,500	\$4,542,500
HCFC	C-10	Sims Bayou	Design and Construction of C506-01-00-E003	\$15,000,000	\$11,250,000	\$3,750,000
HCFC	F-92	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C115-00-00	\$10,000,000	\$10,000,000	\$0
HCFC	F-93	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C124-00-00	\$10,000,000	\$10,000,000	\$0
HCFC	F-94	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C143-00-00	\$10,000,000	\$10,000,000	\$0
HCFC	F-95	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction Along C144-00-00	\$10,000,000	\$10,000,000	\$0
HCFC	C-029	Sims Bayou	Planning, Right-Of-Way Acquisition, Design and Construction of Improvements for the Tributaries of C16c-dp-d0	\$2,000,000	\$2,000,000	\$0
HCFC	C-027	Sims Bayou	Resource Channel Construction Along C146-00-00	\$30,000,000	\$15,000,000	\$15,000,000
HCFC	C-08	Sims Bayou	Right-Of-Way Acquisition, Design, and Construction of Stormwater Detention Basin and Channel Conveyance Improvements along Salt Water Ditch	\$50,000,000	\$37,500,000	\$12,500,000
HC	E-55	Sims Bayou	Streetlight	\$770,000	\$558,000	\$212,000
COH	Berry Bayou	Sims Bayou	Belfort Park, Edgewood Terrace (S of South Park)	\$53,095,509	\$33,095,509	\$20,000,000
COH	Berry Bayou	Sims Bayou	Freeway Manor Area	\$51,467,175	\$18,111,183	\$33,355,992
COH	Berry Bayou	Sims Bayou	Guilford Terrace Area (N)	\$16,536,343	\$16,536,343	\$0
COH	Berry Bayou	Sims Bayou	Guilford Terrace Area (S)	\$22,800,500	\$22,800,500	\$0
COH	Silverwater Ditch	Sims Bayou	MLK Blvd, Belfort to Airport	\$49,025,321	\$49,025,321	\$0
COH	Silverwater Ditch	Sims Bayou	South Park (N)	\$163,775,574	\$163,775,574	\$0
COH	Silverwater Ditch	Sims Bayou	South Park (S)	\$163,775,574	\$163,775,574	\$0
<b>Total</b>				<b>\$579,534,599</b>	<b>\$489,244,107</b>	<b>\$84,290,492</b>



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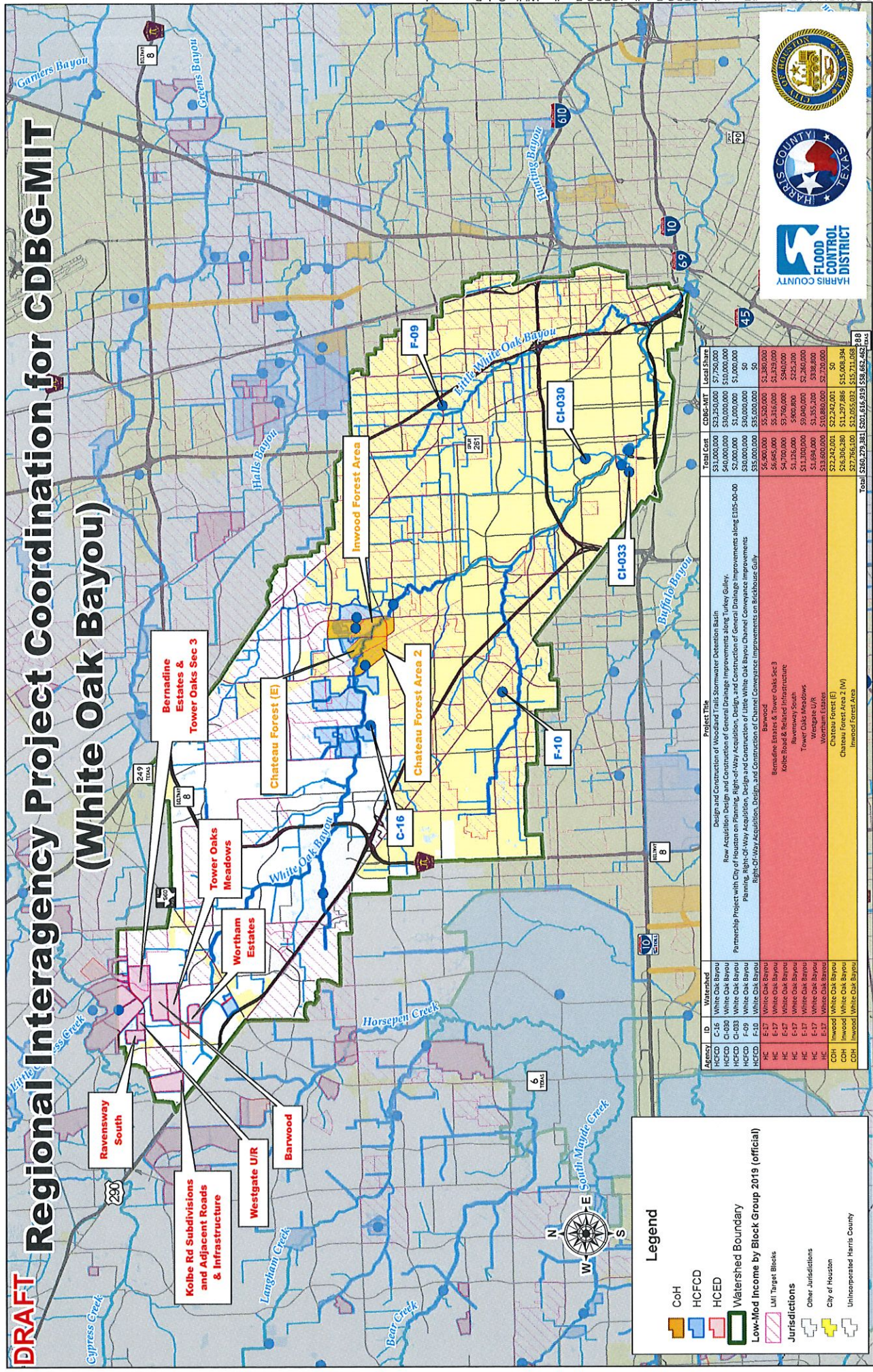
# Regional Interagency Project Coordination for CDBG-MIT (Brays Bayou)



Agency	ID	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
HCFCB	F-07	Brays Bayou	Planning, Right-Of-Way Acquisition, Design, and Construction of Channel Conveyance Improvements on Kegons Bayou	\$2,500,000	\$2,500,000	\$0
HCFCB	C-08	Brays Bayou	Restore Channel Conveyance Capacity Along D115-00-00	\$30,000,000	\$30,000,000	\$0
HCFCB	F-08	Brays Bayou	Right-Of-Way Acquisition, Design, and Construction of Channel Conveyance Improvements on Exeter Diversion Channel	\$30,000,000	\$30,000,000	\$0
HCFCB	C-13	Brays Bayou	Right-Of-Way, Design and Construction of Channel Conveyance Improvements Along Bluff Ditch D133-00-00	\$30,000,000	\$30,000,000	\$0
CoH	Kegons	Brays Bayou	Brays Bayou Valley West	\$104,777,014	\$104,777,014	\$0
CoH	Brays Mid-Reach	Brays Bayou	Fondren US 59 to W. Airport	\$51,352,571	\$51,352,571	\$0
CoH	Brays Mid-Reach	Brays Bayou	Harwin, Fondren Rd to US 59	\$4,858,937	\$4,858,937	\$0
CoH	Brays Mid-Reach	Brays Bayou	Harwin, Fondren Rd to US 59	\$38,029,547	\$38,029,547	\$0
CoH	Kegons	Brays Bayou	Huntington Village	\$51,384,925	\$32,127,696	\$19,257,229
CoH	Brays Mid-Reach	Brays Bayou	Meyersland Area	\$20,781,916	\$20,781,916	\$0
CoH	Brays Mid-Reach	Brays Bayou	Sharpstown Area and Richmond Plaza	\$206,695,061	\$180,430,995	\$26,264,066
CoH	Brays Mid-Reach	Brays Bayou	W. Belfort, Dairy Ashford to US 59	\$23,956,775	\$18,903,124	\$5,053,651
CoH	Brays Mid-Reach	Brays Bayou	Westbury Area	\$275,679,302	\$253,966,782	\$21,712,520
CoH	Brays Mid-Reach	Brays Bayou	Westbury Area	\$201,299,482	\$201,299,482	\$0
CoH	Brays Mid-Reach	Brays Bayou	Willowbend	\$1,381,775,590	\$1,258,215,326	\$123,560,264
<b>Total</b>				<b>\$1,381,775,590</b>	<b>\$1,258,215,326</b>	<b>\$123,560,264</b>

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# Regional Interagency Project Coordination for CDBG-MIT (White Oak Bayou)



### Legend

- CoH
- HCFC
- HCED
- Watershed Boundary
- Low-Mod Income by Block Group 2019 (official)
- LMI Target Blocks
- Jurisdictions**
- Other Jurisdictions
- City of Houston
- Unincorporated Harris County

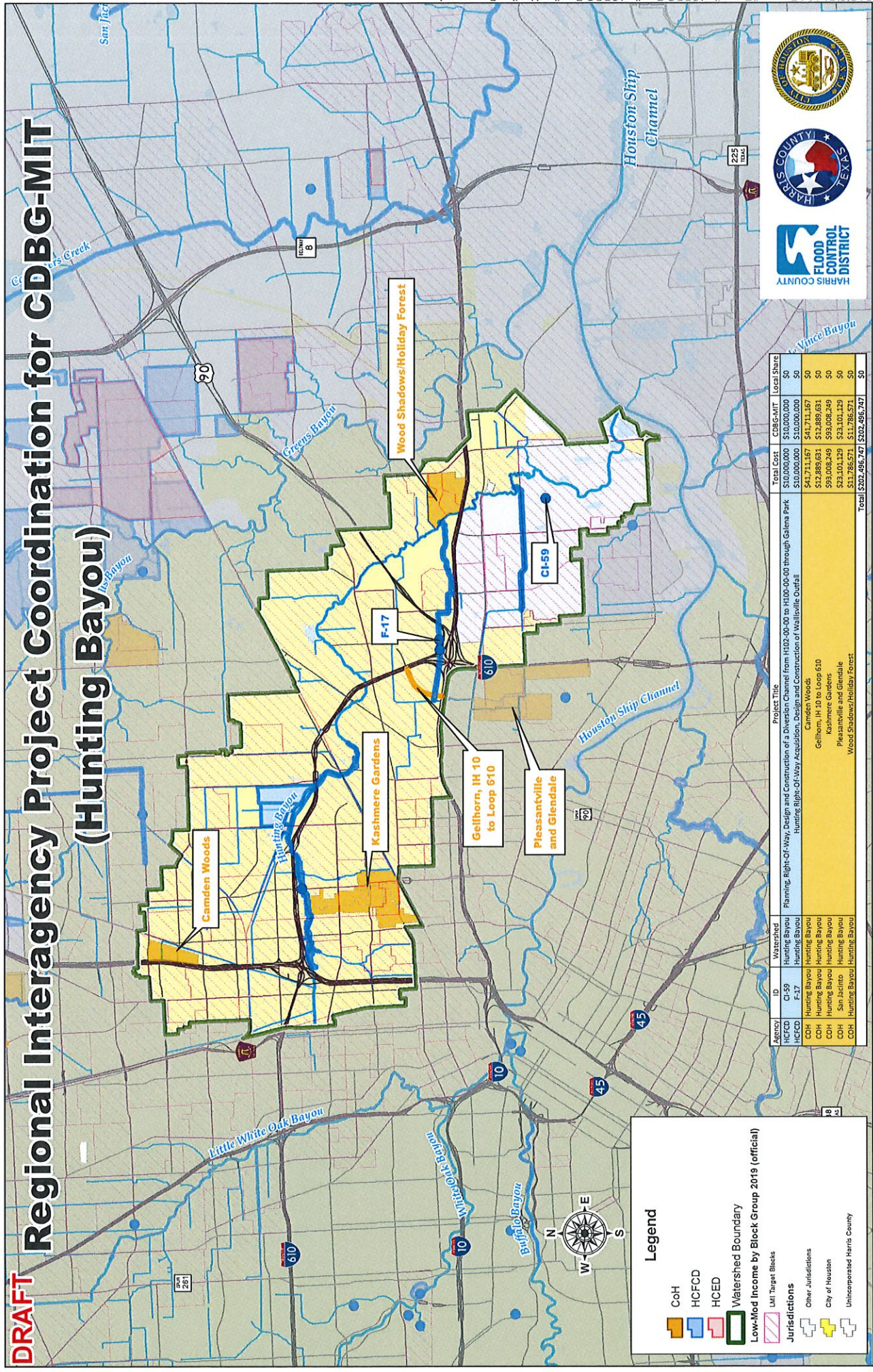
Agency	ID	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
HCED	C-16	White Oak Bayou	Design and Construction of Woodland Trails Stormwater Detention Basin	\$3,000,000	\$3,250,000	\$7,750,000
HCED	C-090	White Oak Bayou	Flow Acquisition Design and Construction of General Drainage Improvements along Turkey Gulley	\$40,000,000	\$30,000,000	\$10,000,000
HCED	C-093	White Oak Bayou	Partnership Project with City of Houston on Planning, Right-of-Way Acquisition, Design, and Construction of General Drainage Improvements along E105-00-00	\$2,800,000	\$1,000,000	\$1,800,000
HCED	F-09	White Oak Bayou	Planning, Right-of-Way Acquisition, Design and Construction of Little White Oak Bayou Channel Concrete Improvements	\$2,800,000	\$1,000,000	\$1,800,000
HCED	F-09	White Oak Bayou	Right-of-Way Acquisition, Design, and Construction of Little White Oak Bayou Channel Concrete Improvements	\$35,000,000	\$35,000,000	\$0
HC	E-17	White Oak Bayou	Barnwood	\$6,600,000	\$5,520,000	\$1,380,000
HC	E-17	White Oak Bayou	Bernadine Estates & Tower Oaks Sec 3	\$6,445,000	\$5,316,000	\$1,229,000
HC	E-17	White Oak Bayou	Kolbe Road & Related Infrastructure	\$4,700,000	\$3,760,000	\$940,000
HC	E-17	White Oak Bayou	Ravensway South	\$1,126,000	\$900,000	\$226,000
HC	E-17	White Oak Bayou	Tower Oaks Meadows	\$1,300,000	\$9,000,000	\$7,700,000
HC	E-17	White Oak Bayou	Westgate U/R	\$1,894,000	\$1,855,200	\$38,800
HC	E-17	White Oak Bayou	Wortham Estates	\$3,600,000	\$3,880,000	\$280,000
COH	Inwood	White Oak Bayou	Chateau Forest (E)	\$2,242,000	\$2,242,000	\$0
COH	Inwood	White Oak Bayou	Chateau Forest Area 2 (W)	\$2,242,000	\$2,242,000	\$0
COH	Inwood	White Oak Bayou	Inwood Forest Area	\$2,765,000	\$3,165,000	\$15,111,000
<b>Total</b>				<b>\$260,275,381</b>	<b>\$201,618,939</b>	<b>\$58,656,442</b>





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# Regional Interagency Project Coordination for CDBG-MIT (Hunting Bayou)

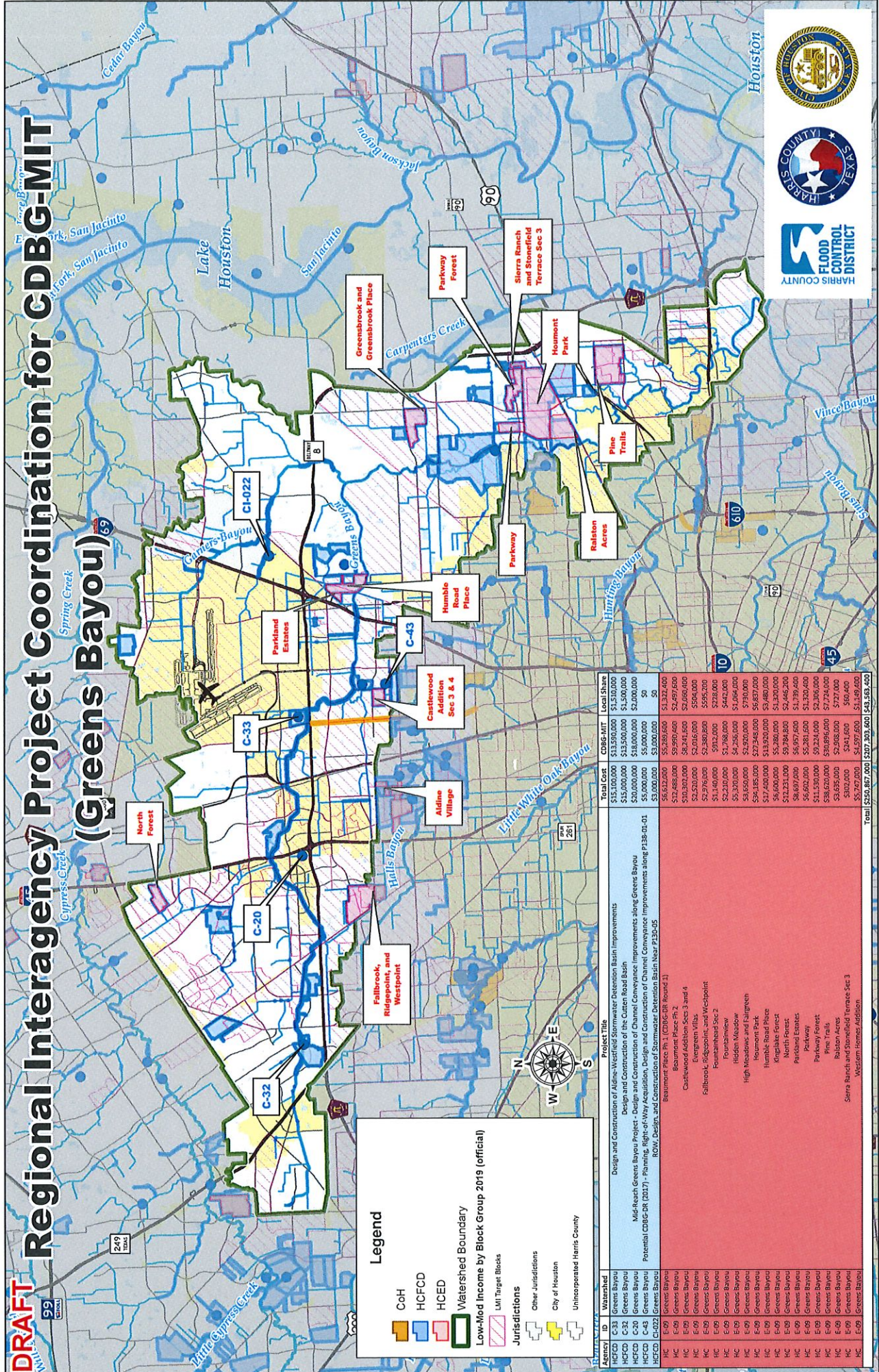


Agency	ID	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
COH	CI-59	Hunting Bayou	Planning, Right-Of-Way, Design and Construction of a Diversion Channel from I102-00-00 to I100-00-00 through Galena Park	\$10,000,000	\$10,000,000	\$0
HCFCD	F-17	Hunting Bayou	Hunting Right-Of-Way Acquisition, Design and Construction of Wallisville Outfall	\$4,711,167	\$4,711,167	\$0
COH	Hunting Bayou	Hunting Bayou	Camden Woods	\$12,889,631	\$12,889,631	\$0
COH	Hunting Bayou	Hunting Bayou	Gellhorn, IH 10 to Loop 610	\$93,008,249	\$93,008,249	\$0
COH	Hunting Bayou	Hunting Bayou	Kashmere Gardens	\$23,101,129	\$23,101,129	\$0
COH	San Jacinto	Hunting Bayou	Pleasantville and Glendale	\$11,786,571	\$11,786,571	\$0
COH	Hunting Bayou	Hunting Bayou	Wood Shadow/Holiday Forest	\$202,496,747	\$202,496,747	\$0
<b>Total</b>				<b>\$302,496,747</b>	<b>\$302,496,747</b>	<b>\$0</b>



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# Regional Interagency Project Coordination for CDBG-MIT (Greens Bayou)



### Legend

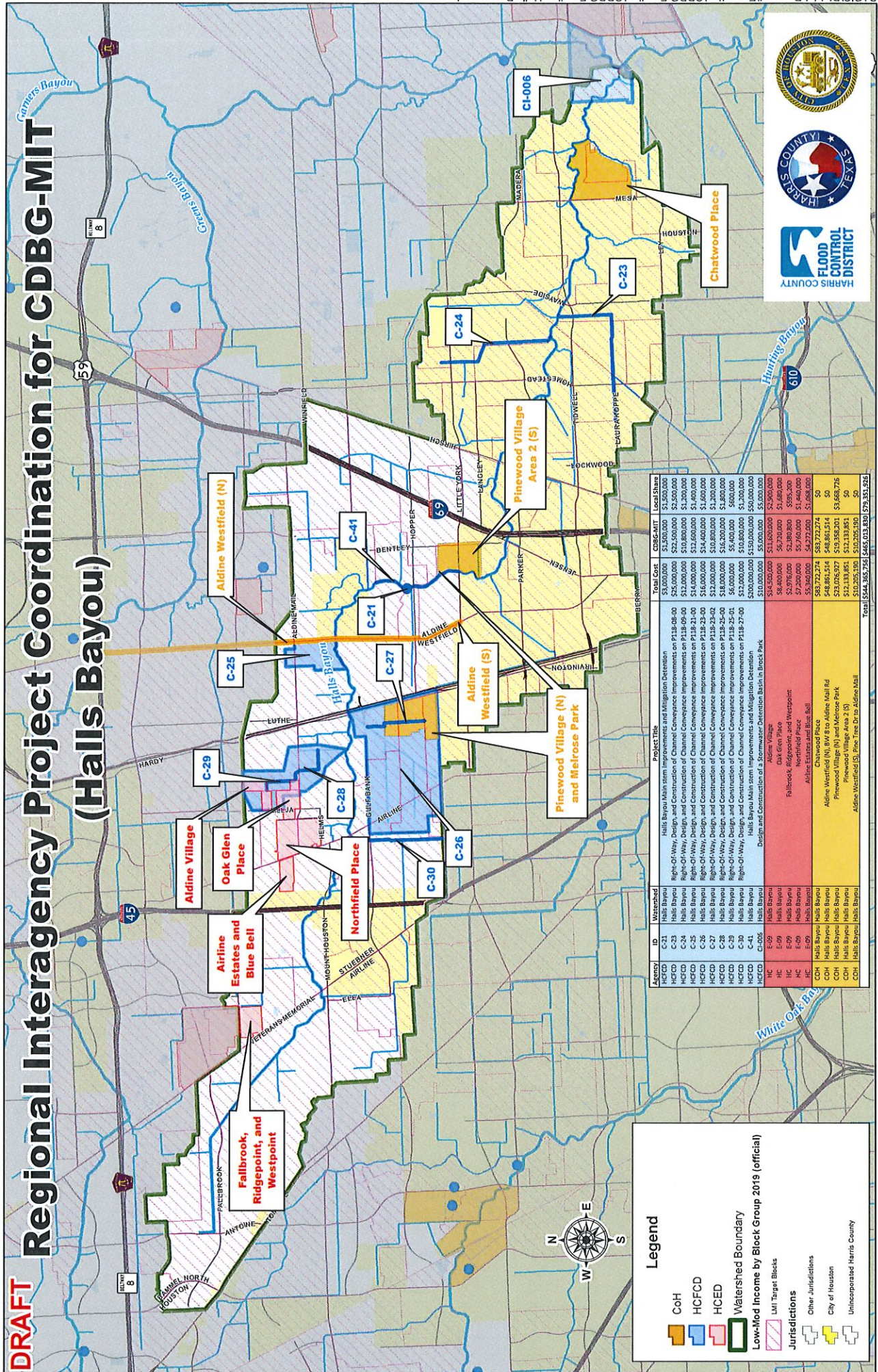
- CoH
- HCFCO
- HCED
- Watershed Boundary
- Low-Med Income by Block Group 2019 (official)
- LMI Target Blocks
- Other Jurisdictions
- City of Houston
- Unincorporated Harris County

Agency ID	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
HC E-09	Greens Bayou	Design and Construction of Aldine-Westfield Stormwater Detention Basin Improvements	\$15,100,000	\$13,500,000	\$1,600,000
HCFCO C-33	Greens Bayou	Design and Construction of the Cutten Road Basin	\$15,000,000	\$13,500,000	\$1,500,000
HCFCO C-32	Greens Bayou	Mid-Reach Greens Bayou Project - Design and Construction of Channel Conveyance Improvements along Greens Bayou	\$20,000,000	\$18,000,000	\$2,000,000
HCFCO C-20	Greens Bayou	Potential CDBG-DR (2017) - Planning, Right-of-Way Acquisition, Design and Construction of Channel Conveyance Improvements along P138-01-01	\$5,000,000	\$5,000,000	\$0
HCFCO C-43	Greens Bayou	ROW, Design, and Construction of Stormwater Detention Basin Near P230-05	\$1,000,000	\$1,000,000	\$0
HCFCO C-022	Greens Bayou		\$5,280,000	\$3,200,000	\$2,080,000
HC E-09	Greens Bayou	Baumann Place Ph. 2	\$12,800,000	\$8,700,000	\$4,100,000
HC E-09	Greens Bayou	Castlewagon Addition Secs 3 and 4	\$2,200,000	\$2,200,000	\$0
HC E-09	Greens Bayou	Saltbrook, Ridgepoint, and Westpoint	\$2,976,000	\$2,380,000	\$596,000
HC E-09	Greens Bayou	Foundrainbow	\$1,140,000	\$912,000	\$228,000
HC E-09	Greens Bayou	Hidden Meadow	\$2,210,000	\$1,788,000	\$442,000
HC E-09	Greens Bayou	High Meadows and Fairgreen	\$5,320,000	\$4,256,000	\$1,064,000
HC E-09	Greens Bayou	Houmont Park	\$3,850,000	\$2,920,000	\$930,000
HC E-09	Greens Bayou	Humble Road Place	\$9,185,000	\$7,348,000	\$1,837,000
HC E-09	Greens Bayou	Kinglake Forest	\$17,400,000	\$13,920,000	\$3,480,000
HC E-09	Greens Bayou	North Forest	\$6,000,000	\$5,280,000	\$720,000
HC E-09	Greens Bayou	Parkland Estates	\$2,210,000	\$1,788,000	\$442,000
HC E-09	Greens Bayou	Parkway Forest	\$8,697,000	\$6,957,600	\$1,739,400
HC E-09	Greens Bayou	Parkway Forest	\$3,500,000	\$2,750,000	\$750,000
HC E-09	Greens Bayou	Ralston Acres	\$38,620,000	\$30,986,000	\$7,634,000
HC E-09	Greens Bayou	Sierra Ranch and Stonefield Terrace Sec 3	\$3,635,000	\$2,908,000	\$727,000
HC E-09	Greens Bayou	Watershed Home Addition	\$402,000	\$241,600	\$160,400
HC E-09	Greens Bayou		\$5,267,000	\$4,597,600	\$669,400
HC E-09	Greens Bayou		\$250,867,000	\$207,303,600	\$43,563,400



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# Regional Interagency Project Coordination for CDBG-MIT (Halls Bayou)



Agency	Watershed	Project Title	Total Cost	CDBG-MIT	Local Share
HC	Halls Bayou	Halls Bayou Main stem Improvements and Mitigation Detention	\$3,000,000	\$1,500,000	\$1,500,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-08-00	\$25,000,000	\$22,500,000	\$2,500,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-21-00	\$14,000,000	\$12,600,000	\$1,400,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-23-00	\$16,000,000	\$14,400,000	\$1,600,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-23-02	\$12,000,000	\$10,800,000	\$1,200,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-25-00	\$18,000,000	\$16,200,000	\$1,800,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-25-01	\$6,000,000	\$5,400,000	\$600,000
HC	Halls Bayou	Right-of-Way, Design, and Construction of Channel Conveyance Improvements on P118-27-00	\$12,000,000	\$10,800,000	\$1,200,000
HC	Halls Bayou	Halls Bayou Main stem Improvements and Mitigation Detention	\$30,000,000	\$15,000,000	\$15,000,000
HC	Halls Bayou	Design and Construction of Aldine Village	\$18,500,000	\$13,500,000	\$5,000,000
HC	Halls Bayou	Oak Glen Place	\$8,400,000	\$6,700,000	\$1,700,000
HC	Halls Bayou	Fallbrook, Ridgepoint, and Westpoint	\$2,276,000	\$2,280,000	\$955,200
HC	Halls Bayou	Northfield Place	\$7,200,000	\$5,760,000	\$1,440,000
HC	Halls Bayou	Aldine Estates and Blue Bell	\$5,350,000	\$4,277,000	\$1,073,000
COH	Halls Bayou	Chatwood Place	\$83,722,274	\$83,722,274	\$0
COH	Halls Bayou	Aldine Westfield (N), BW 870 Aldine Mall Id	\$48,861,514	\$48,861,514	\$0
COH	Halls Bayou	Pinewood Village Area 2 (S)	\$12,133,851	\$12,133,851	\$0
COH	Halls Bayou	Aldine Westfield (S), Rose Tree Dr to Aldine Mall	\$10,205,190	\$10,205,190	\$0
<b>Total</b>			<b>\$344,365,793</b>	<b>\$245,013,883</b>	<b>\$99,351,910</b>

