



TEXAS GENERAL LAND OFFICE
GEORGE P. BUSH, COMMISSIONER

December 6, 2018

Mr. Tom McCasland, Director
Housing and Community Development Department
City of Houston
601 Sawyer Street, Suite 400
Houston, TX 77054

Re: City of Houston's Needs Assessment – 2017 Hurricane Harvey CDBG-DR Funds

Dear Mr. McCasland:

The Texas General Land Office Community Development and Revitalization program (GLO-CDR) has completed its review and approves the City of Houston's proposed Local Housing Needs Assessment for determining methodology of expenditure for the Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the Homeowner Assistance Program based upon the unmet needs of communities affected by Hurricane Harvey. The City of Houston's approach and methodology for the Needs Assessment relies on predicative modeling and other scientific approaches that differ from the GLO's FEMA data reliance and Census data approach. The City's Needs Assessment presents a data methodology differing from that used for the regional Housing Assistance Program methodology employed by the GLO which is acceptable at this time.

Houston's Local Housing Needs Assessment has determined the proportions of funding awarded that must be set aside to benefit each low to moderate income (LMI) and non-low to moderate income economic groups. The demographic data will inform the City's program guidelines and Marketing and Outreach Plans to fairly allocate funds across jurisdictions and neighborhoods to serve survivors in proportion to unmet need. Furthermore, the Needs Assessment determines the activities to be offered, the demographics to receive concentrated attention, and target areas to serve people with disabilities and vulnerable populations, and how the City will target areas to be served through the City's Affirmative Marketing Outreach Plan.

The City's Local Housing Needs Assessment documents goals within the income brackets in proportion to the damaged units in the impacted area. Please note that deviations from the goals below which are outlined in the Needs Assessment must be approved by the GLO before the City may can move as presented in the tables below:

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P.O. Box 12873, Austin, Texas 78711-287
512-463-5001 glo.texas.gov

Table 28: Percent of Impact by Income Category

Income Category	Impacted Households	Percent of Impacted Households	Minimum Target	Maximum
Extremely Low-Income (30% AMI and Below)	36,752	17.62%	17.62%	
Low-Income (31% to 50% AMI)	30,353	14.56%	14.56%	
Moderate-Income (51% to 80% AMI)	36,346	17.43%	17.43%	
0-80% AMI (Non-Targeted)			20.39%	
Middle/Upper Income (Above 80% AMI)	105,080	50.39%		30.00%
Total	208,531	100.0%	70.00%	30.00%
Total LMI	103,451	49.61%	70.00%	100.00%

Next, the minimum and maximum target percentages are applied to the Homeowner Assistance Program funds to determine the targeted expenditures for each income category.

Table 29: Goal Income Categories for Homeowner Assistance Program


Homeowner Assistance Program		\$392,729,436	
Income Category	Minimum Target	Maximum	
Extremely Low-Income (30% AMI and Below)	\$69,215,571		
Low-Income (31% to 50% AMI)	\$57,164,242		
Moderate-Income (51% to 80% AMI)	\$68,450,945		
0-80% AMI (Non-Targeted)	\$80,079,847		
Middle/Upper-Income (Above 80% AMI)		\$117,818,830	
Total	\$274,910,605	\$117,818,830	
Total LMI	\$274,910,605	\$392,729,436	

Additionally, the City of Houston is mandating that 70% of their Housing Assistance Program funds will be spent on low to moderate income households, which is appropriate given the Federal Register Notice requirements. Following HUD's approval of the State of Texas Plan for Disaster Recovery: Amendment 1, as submitted November 28, 2018, may be implemented.

The GLO will monitor the City's CDBG-DR programs to ensure that LMI economic groups are served and prioritized as stated in the City's Local Housing Needs Assessment and Homeowner Assistance Program Guidelines.

If you have any questions, please feel free to contact me at (512) 475-5027, or Tracie Tolle, Grant Coordinator, at (512) 475-5050 or Tracie.Tolle.glo@recovery.texas.gov.

Sincerely,



Heather Lagrone, Deputy Director
 Community Development and Revitalization
 Texas General Land Office

cc: Mayra Bontemps, Assistant Director, HCDD, City of Houston
 Maureen Mahoney, Director, Regulatory Oversight, GLO-CDR
 Tracie Tolle, Grant Coordinator, Community Oversight, GLO-CDR