

City of Houston Response to Written Public Comment from Needs Assessment Public Hearing

Rev. David Israel Madison – Greater Ward AME Church

Comment Received: “The allocation and execution of the Round 1 funds and plan is taking way too long. Single family dwellings should be a priority. People should not be moved from ownership to rental. Infrastructure must be improved in these communities. Changes should be as visible as possible in order to lift the moral of communities and attract private investment.”

City Response: The City appreciates the difficulties five years after the storm that many people still need assistance. The Needs Assessment does not, however, deal with Round 1 applications. There are funds targeted to single family dwellings and the program does not include moving applicants from ownership to rental properties. Infrastructure is not addressed in the Needs Assessment.

Jon Cooper

Comment Received: “I commented that people should not be moved to areas where their overall cost of living will increase. This is a response to the Director’s comment: If it is to people’s advantage that they move further away from the central city, they should move there. If it will cost a given person more to move and live in that area, the City needs to make that person aware of this and give them other options.”

City Response: No one will be forced to relocate. The program that includes a voluntary relocation option (Homeowner Opportunity Program) gives the applicant the option of relocating after communicating with a mobility counselor to explore what is best for the individual applicant’s situation. Detailed information and counseling will be made available to eligible applicants concerning their options for assistance.

Dorothy Norris – Vice President New South Union Civic Association

Comment Received: The City received a support letter and petition in support of Tierwester Senior Village proposed in South Union by Water Mark Tierwester, Ltd.

City Response: The City of Houston appreciates the support for the node designation process. The determination of which nodes will be targeted will be completed after a planning process as part of the Outreach Plan. Disaster Recovery funds must be used according to Federal and State Guidelines. Your letter will be forwarded to the appropriate staff.

Amanda Timm – Executive Director, Houston with Local Initiatives Support Corporation (LISC)

Comment Received: The City received a letter from LISC requesting additional language to be added to Section 7 of the Needs Assessment. LISC facilitated several public meetings to gather community support and input for the identification of targeted nodes of opportunity for Disaster Recovery investment. LISC also mentioned that through local philanthropy, LISC contributed more than \$10,000 to ensure the process went well and the participants were appropriately accommodated.

City Response: The City of Houston appreciates LISC's efforts and support in facilitating the public meetings during this process, as well as, the financial support provided. Please note the changes made to Section 7 of the Needs Assessment final document addressing the concerns raised.

John Henneberger – Co-Director Texas Low Income Housing Information Service

Comments Received: The City of Houston received a letter with the following points summarized below.

- a. The draft Needs Assessment uses an incorrect income targeting formula to determine the required economic targeting brackets. The income targeting discussion on page 36 of the Needs Assessment details this incorrect income targeting formula. The data on FEMA claims by income should be presented and analyzed in the Needs Assessment.
- b. Houston has not distinguished between homeowners and renter in its Needs Assessment. Houston needs to produce a separate Needs Assessment for rental housing.
- c. Rental units from Round 1 can only be credited to VLI or LI targeting brackets if they are actually occupancy restricted and the rents are affordable to that income group.
- d. The discussion of public housing needs is confusing and should be clarified.
- e. The elderly and disable preference cannot be implemented in a way that disadvantages other protected classes under the Fair Housing Act, particularly households with children.
- f. The City should consider including its analysis of non-housing disaster recovery needs in the Needs Assessment.

City Response:

- a. The Needs Assessment drafting team looked at published income totals, HUD FEMA data totals, and damage based on census information. The income buckets of Very Low-

income (37%), Low-income (29%) and Moderate-income (34%) are consistent with the available information. The City of Houston is engaging in an active planning phase that will help clarify the income bracket funding. The income buckets will again be addressed during the Outreach Plan once the planning phase is complete. The City recognizes that the final implemented allocation will be adjusted, as informed by the planning process, in order to deliver the desired outcome of stable, racially, ethnically, and economically mixed communities.

- b. Rental housing is addressed as an important component with approximately 50% of all Houstonians renting. We have discussed vacancy rates in the city and addressed the need for additional rental housing. The City is committed to supporting low income rents, including a large portion of the funds being provided to Houston Housing Authority, who can provide additional subsidies to lower the overall rents.
- c. The City will limit the rents according the rules and requirements addressed in the guidelines. The City agrees that more affordable rents are a need, however rent restrictions are not an issue discussed in the Needs Assessment.
- d. The City agrees with the comment that the Houston Housing Authority's (HHA) capital needs are not a valid expense with CDBG-DR funds. The purpose of including the language regarding the capital needs of the HHA represents the need for additional subsidized housing throughout the city. HHA is the logical place to address this need. The information is from the City of Houston's Consolidated Plan and is not a funding plan using DR funds.
- e. The City will meet the intention of the Housing Guidelines to provide priorities to elderly and persons with disabilities, but will also make certain that families have been included. If it is a determination for one spot then the preference would go to an elderly or special needs person, but not to the exclusion of all others.
- f. We have reviewed the Conciliation Agreement, the State Housing Guidelines and the Housing Opportunity Program Guidelines and cannot find a requirement to include infrastructure programs in the Needs Assessment. If the General Land Office provides guidance to the contrary, we will amend the Needs Assessment.