



CITY OF HOUSTON

Housing & Community Development Department

Sylvester Turner

Mayor

Thomas McCasland
Director
601 Sawyer, Suite 400
Houston, Texas 77007

T. (832) 394-6282
F. (832) 395-9662
www.houstontx.gov/housing

September 20, 2018

Re: Submission of Housing Project Application for 2016 Flood Events

Ms. Heather Lagrone
Deputy Director, Community Development and Revitalization
The Texas General Land Office
1700 N. Congress Avenue
Austin, TX 78711-2873

Dear Ms. Lagrone:

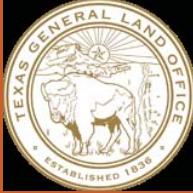
Please find the attached Housing Project Application for the Community Development Block Grant Disaster Recovery funding for 2016 flood events, for DR-4269 and DR-4272. If you have any questions, I may be reached at 832-394-6282, or you may contact Derek Sellers, our department's GLO liaison, at 832-394-6239.

Very Truly Yours,

A handwritten signature in blue ink that reads "Keith W. Bynam".

Keith W. Bynam
Deputy Director
On behalf of:
Tom McCasland
Director

Attachment:
Housing Project Application for 2016 Flood Events



**COMMUNITY DEVELOPMENT
& REVITALIZATION**

2016 Housing Project Application

(DR-4266, DR-4269 and DR-4272)

Texas General Land Office
P.O. Box 12873, Austin, TX 78711-2873
866.206.1084 or 512.475.500
cdr@glo.texas.gov

City of Houston

APPLICANT NAME

Harris

COUNTY

1. TYPE OF SUBMISSION Application: Pre-application: <input type="checkbox"/> Construction <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction <input type="checkbox"/> Non-Construction	2. DATE SUBMITTED: 3. DATE RECEIVED BY STATE: 4. DATE REC'D by FEDERAL AGENCY:	APPLICANT IDENTIFIER: STATE APPLICATION IDENTIFIER: FEDERAL IDENTIFIER:
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5. APPLICANT INFORMATION:

Legal Name: City of Houston Address (City, County, State, and Zip Code) of applicant: 601 Sawyer, Suite 400 Houston, TX 77007	Organizational Unit: Housing and Community Development Department Name/Title, Agency or Company, Address, Area Code, Telephone and Fax Numbers, and email address of application preparer: Tom McCasland, Director 601 Sawyer, Suite 400 Houston, TX 77007 832.394.6282 Tom.McCasland@houstontx.gov
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6. EMPLOYER IDENTIFICATION NUMBER (EIN): 746001164	6a. DUNS NUMBER: 8324319850000
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7. TYPE OF APPLICANT: <input checked="" type="checkbox"/> A. Municipal <input type="checkbox"/> B. County <input type="checkbox"/> C. Public Housing Authority	8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision
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9. NAME OF FEDERAL / STATE AGENCY: U.S. Department of Housing and Urban Development/Texas General Land Office	10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14.228
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11. PROJECT TYPE: BP Buyout Program	11a. TYPE OF APPLICATION: Community Development Block Grant - Disaster Recovery (CDBG-DR)
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12. TARGET AREA(S) AFFECTED BY THE PROJECT: City of Houston	13. APPLICANT'S FISCAL YEAR: Beginning Date: Jul 1, 2018 Ending Date: Jun 30, 2019
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14. CONGRESSIONAL DISTRICTS:	Representative: 3,15,26 Senate: 4,6,7,1 Congress: 2,7,8,9
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15. ESTIMATED FUNDING: A. CDBG-DR REQUEST: \$23,486,698.00 B. FEDERAL: _____ C. STATE: _____ D. APPLICANT: _____ E. LOCAL: _____ F. OTHER: _____ G. TOTAL: \$23,486,698.00	16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? <input type="checkbox"/> Yes the pre-application/application was made available to the State Executive Order 12372 process for review on: Date: _____ <input checked="" type="checkbox"/> No <input type="checkbox"/> Program is not covered by E.O. 12372 -OR- <input checked="" type="checkbox"/> Program has not been selected by the State for review
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17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes. If "Yes," attach an explanation. <input checked="" type="checkbox"/> No
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18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PRE-APPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT, AND THE APPLICANT WILL COMPLY WITH THE CERTIFICATIONS AND CITIZEN PARTICIPATION PLAN INCLUDED IN THE PROCEDURES SECTION OF THE CDBG-DR PROGRAM APPLICATION GUIDE IF THE ASSISTANCE IS AWARDED.

Typed Name of the Applicant's Authorized Representative: Tom McCasland	Title Director	Telephone Number +1 (832) 394-6282	Email Address Tom.McCasland@houstontx.gov
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Signature of the Applicant's Authorized Representative:	Date
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INSTRUCTIONS

1. This application is for housing activities.

All activities must have documented proof of an impact by DR-4266, DR-4269, and/or DR-4272 disaster declarations in 2016. Community Development Block Grant - Disaster Recovery (CDBG-DR) funds must be used for disaster-related expenses in the most impacted and distressed areas. An activity underway prior to a Presidential disaster declarations will not qualify unless the disaster impacted the project.

All eligible activities must be directly related to DR-4266, DR-4269, and/or DR-4272 disaster declarations in 2016 through actual direct damage and allowed under the State of Texas Plan for Disaster Recovery.

2. Applicants are encouraged to develop their community recovery projects in a manner that considers an integrated approach to housing, Fair Housing obligations, economic revitalization, and overall community recovery. Applicants also must document how the use of these funds will address long-term recovery.

3. For detailed information regarding application instructions, see Community Development and Revitalization (CDR) Housing Project Application Guide.

PROJECT INFORMATION

DESCRIPTION OF THE NEED(S) ADDRESSED IN THIS APPLICATION

Provide full and complete answers to each of the questions below. Descriptions should include the cause of the damage, current condition of the activity, and a detailed description of the project that coincides with the information contained in both Table 1 and 2.

All activities must have documented proof of an impact by the floods and storms. CDBG-DR funds must be used for disaster-related expenses in the most impacted and distressed areas.

1. Describe the specific flood and storm-related condition that caused direct damage:

In 2016, the Houston area had two devastating flood events resulting in the federal declaration of major disasters for Harris County. The first, FEMA DR-4269-TX, occurred in April 2016 and is known as the "Tax Day Flood." The second, FEMA DR-4272-TX, occurred over a month-long period from May 22 through June 24, 2016. During the Tax Day Flood, approximately 15 inches of rain fell in 24 hours in the Houston area, with most of the rain falling within a ten-hour period. This intense rain event caused flooding in homes and businesses leading to hundreds of high water rescues. Many rescues occurred in Greenspoint, a predominately low- and moderate-income community. Approximately 20,000 homes were flooded in Houston, resulting in millions of dollars in real property and personal property losses.

2. Describe the impacts on the community that resulted from the direct damage:

As a result of flooding, many residents were evacuated and could not return to their damaged home until repairs were made, which took several months in some cases. Displacement, loss of personal belongings, and finding suitable alternative living arrangements put mental, physical, and financial strain on many families. Some residents who flooded in the 2016 flood events had also flooded previously in some cases just one year earlier during the 2015 flood events. Some of these flooded homes were not repaired and have been left vacant, impacting community character, safety, and housing availability.

3. Describe how the proposed activities will address damage affected by the floods and storms:

This proposed Housing Buyout Program would remove single family and multifamily homes from areas at severe risk of future flooding, preventing future flood impacts for families.

4. List materials submitted as documentation of the flood and storm-related condition:

- Map: FEMA Claim Data
- Map: Debris Clean Up
- Map: 311 reports of Flooding

5. Describe the proposed project:

The proposed Housing Buyout Program will fund the purchase of single family or multifamily properties, the relocation of residents, and the demolition of the homes. The proposed activities will remove housing from the floodplain and prevent residential flooding in the future. This is a voluntary program and eminent domain will not be used. The City and/or a subrecipient, such as the Harris County Flood Control District, will carry out the program. Properties will be returned to green space to help absorb water and mitigate street and residential flooding in the future. Only property impacted by a 2016 flood event are eligible. Property will be dedicated and maintained in perpetuity for use that is compatible with open space.

LONG-TERM PLANNING

Applicants must develop their community recovery projects in a manner that considers an integrated approach to housing, Fair Housing obligations, infrastructure, economic revitalization, and overall community recovery. Applicants must also document how the use of these funds will address long-term recovery.

1. Provide a brief description of how the project addressed in this application forms part of an integrated approach to recovery.

Housing buyouts are a key component of a successful flood control strategy. Typically, buyouts consist of a government entity buying a home, whether single family or multifamily, razing it, and removing it permanently from the risk of flooding. Further benefits include the creation of recreational green space in the neighborhood, such as parks and lakes, that also serve the purpose of floodwater retention. By removing units from the floodway and floodplain, many of which are insured by the National Flood Insurance Program, buyouts can help end the cycle of repetitive loss and the resulting insurance payments, saving taxpayers millions of dollars. In addition, these activities will affirmatively further fair housing through the relocation process by ensuring residents relocate to a comparable and affordable home in areas that are not located in high risk flooding areas, such as a floodway, flood pool, or the 100-year floodplain. Property will be dedicated and maintained in perpetuity for use that is compatible with open space. Environmental review will be performed on each property before approval of the property buyout.

COMMUNITY NEEDS ASSESSMENT

LIST OF ALL IDENTIFIED COMMUNITY NEEDS/PROBLEMS

1. Home repair assistance
2. Removing homes from floodplain through buyout or elevation
3. Drainage improvements
4. Large scale flood retention improvements
5. Economic development activities

HOUSING NEEDS ASSESSMENT QUESTIONNAIRE:

Describe the jurisdiction's current supply of affordable housing (Public Housing, Section 8 assisted, RHS assisted, HOME program assisted, TDHCA assisted, Local Housing Development Corp. assisted, etc.).

The Houston Housing Authority (HHA) is the public housing authority that operates within and directly outside the City limits of Houston. HHA provides affordable homes and services to more than 60,000 low-income Houstonians, including over 17,000 families housed through the Housing Choice Voucher Program. HHA and its affiliates own and operate 25 housing communities with more than 5,500 units for families, elderly, persons with disabilities, and other residents. HHA also administers the nation's third largest voucher program that exclusively serves homeless veterans.

TDHCA has approximately two hundred tax credit properties in the city limits of Houston, with over 35,000 affordable rental units for low- and moderate-income families. Some of the City of Houston income-restricted units are also considered income-restricted by TDHCA.

As of February 2018, the Housing and Community Development Department's (HCDD) multifamily portfolio included 14,191 housing units in over 86 developments, with 6,552 income-restricted units. HCDD's multifamily housing utilizes a variety of local, state, and federal funding sources, such as CDBG, HOME, TIRZ, and Affordable Housing Bonds, to develop and rehabilitate multifamily housing. HCDD also helps enhance the quality of affordable, owner-occupied homes by funding repairs or reconstruction of homes owned by low- and moderate-income families.

Houston's housing costs continue to increase drastically, while incomes have only seen moderate gains in recent years. From 2010 to 2016, the median household income in Houston increased by 9%, while the median single family sales price in the area increased by 44%. Housing prices are significantly outpacing increases in incomes. In addition, the impact of Hurricane Harvey and the other 4 Presidentially declared disasters that occurred during the past three years have also reduced the housing the supply of affordable homes, causing further increase in housing prices. HCDD offers a Homebuyer Assistance Program that helps low- and moderate-income homebuyers access market rate housing through downpayment and closing cost assistance. HCDD also uses federal entitlement grants to provide rental assistance to help low- and moderate-income individuals and families access market rate rental homes.

Despite the variety of federal, state, and local programs for affordable housing, there is a continuing need for more quality, affordable homes in various neighborhoods throughout the City. Nearly 50% of the 831,166 households (2016 5-year ACS) in Houston are low- and moderate-income, and that number continues to grow much faster than the number of middle- and upper-income households, showing the need to increase the affordable housing supply in Houston.

Describe the applicant's past efforts to increase the supply of affordable housing.

The City of Houston uses various federal, state, and local funding sources to increase the supply of affordable housing in Houston. The City funds the rehabilitation and construction of new affordable homeowner and renter homes and funds programs to decrease the cost of market rate housing to make it available to low- and moderate-income families through homebuyer assistance and tenant based rental assistance. In Program Year 2015 and 2016, HCDD funded the completion of 186 new rental units and 337 rehabilitated rental units for low- and moderate-income families and assisted 43 homeowners with homebuyer assistance using CDBG and HOME grant funds. In addition, 59 homes were repaired or reconstructed using CDBG-DR Round 2 funds during the 2015 and 2016 program years. Also during PY 2016, 458 homeowners were assisted with TIRZ funding for roof repairs through the Blue Tarp Program.

Describe any future efforts that the applicant plans to undertake to increase the supply of affordable housing.

The City of Houston will receive \$1.17 billion from the Texas General Land Office (GLO) a portion of which will be for housing related activities to assist with repairing, rebuilding, and constructing new housing for households impacted by

Hurricane Harvey. This funding, along with entitlement grants and other local funding sources, will be leveraged with private and other public funding to increase the supply of affordable homes in Houston over the next few years. In addition, the City recently received a direct allocation from HUD to address impacts from two flood events in 2015, and a portion of these funds will be used for repair or reconstructing homes for low- and moderate-income homeowners. The City will also continue the housing programs supported by regular entitlement funds, including the Home Repair Program, Homebuyer Assistance Program, rental assistance, and building and rehabilitating single family and multifamily homes for rental and homeownership through several programs.

Describe any instances, within the last 10 years, where the applicant has applied for affordable housing funds and did not receive the funding.

None have occurred.

Describe any instances, within the past 5 years, where the applicant has not accepted funds for affordable housing.

None have occurred.

Describe any current and/or future planned compliance codes to mitigate hazard risks.

In April 2018, the City of Houston adopted amendments to Chapter 19 of the Code of Ordinances, which establishes procedures for implementing the Floodplain Ordinance. The previous regulations only regulated the 100-year floodplain and included elevating structures to 1 foot above the 100-year flood elevation and zero net fill. The changes in the amendment include increasing the minimum flood protection elevation to 2 feet above the 500-year flood elevation in both the 100-year and 500-year floodplains and extending the zero net fill requirement to the 500-year floodplain.

These regulation changes will help reduce the risk of flooding of structures in the 100-year and 500-year floodplains and ensure that the risk of flooding is reduced for new structures and not worsened for existing structures.

AFFIRMATIVELY FURTHERING FAIR HOUSING ACTIVITIES

Any locality receiving CDBG-DR funds must certify that it will affirmatively further fair housing. Using the below drop-down box, please identify the activities presently undertaken to affirmatively further fair housing, and which new activities will be undertaken if an award is made by GLO-CDR. Localities should be aware that, in the event of funding, these fair housing efforts will be monitored. Other activities may be eligible, and the applicant should contact GLO-CDR to determine eligibility.

What methods and criteria were used to prioritize the project in the application, including affirmatively furthering fair housing?

Information gathered through community engagement activities was used to prioritize housing buyout. Residents identified removing homes from high risk areas such as the floodplain through housing buyout as a priority. The program will prioritize low- and moderate-income households or areas that are low- and moderate-income. Low- and moderate-income families are the least likely to have disposable income and other sources to aid in recovery from a natural disaster, and therefore, these families should not live in areas that have a high risk of flooding. HCDD will promote fair housing in these projects through the relocation process by ensuring residents from multifamily and single family housing relocate to a comparable and affordable areas and to a home that is not located in a floodway, flood pool, or 100-year floodplain. Using the option of "housing of last resort," due to flooding and the lack of affordable housing available in Houston, HCDD will ensure that single family residents receive relocation and supplemental payments to assist in their relocation to a new home. In addition, HCDD will ensure that multifamily residents are provided advisory services to assist with their relocation.

Activity(ies)			+	X
Designating a Fair Housing Month	Undertaken <input checked="" type="checkbox"/>	To be Undertaken <input type="checkbox"/>		
Publishing the contact information – at the local, state and federal levels – for reporti	Undertaken <input checked="" type="checkbox"/>	To be Undertaken <input type="checkbox"/>		
Hold a special hearing to solicit input from the community	Undertaken <input checked="" type="checkbox"/>	To be Undertaken <input type="checkbox"/>		
Other (Describe) Promote Say Yes! Campaign as an Anti-NIMBY strategy, including a	Undertaken <input checked="" type="checkbox"/>	To be Undertaken <input type="checkbox"/>		

FOR PUBLIC HOUSING AUTHORITY or MULTIFAMILY PROJECT ONLY

Yes No N/A

1. Describe your public housing needs/problem:

When a multifamily buyout property is identified and selected, the City will provide the following information to the GLO.

- 2. Has the applicant vetted its proposed project(s) through the U.S. Housing and Urban Development (HUD) Public and Indian Housing Program (PIH)?
- If "yes", Have the project(s) been approved by PIH?
- 3. Has the applicant reviewed its proposals to ensure that the project Affirmatively Further Fair Housing using HUD's AFFH tool (<https://www.hudexchange.info/resource/4867/affh-data-and-mapping-tool>) or using another fair housing assessment?
- 4. Does the project require acquisition of property, purchase of easements, relocation or any other activity requiring compliance with the Uniform Relocation Act?
- 5. Will the assistance requested cause the displacement of families, individuals, farms, or businesses?
- 6. If FEMA or insurance funds were received for any project in this application, the use of those funds must be fully described in the project summary and included in the project budget if they are applied to project development.

FEMA Coverage (Multifamily Rental & Public Housing Only)

- 1. Was FEMA contacted regarding project eligibility?
- 2. If FEMA was contacted, please provide FEMA response. (Attach all relevant documentation)

When a multifamily buyout property is identified and selected, the City will provide this information to the GLO.

- 3. If project was determined to be eligible, were FEMA funds committed/received for the project?
- 4. If FEMA funds were received, please provide the amount received, explain why funds are needed above and beyond FEMA funds, and include a copy of the project worksheet.

When a multifamily buyout property is identified and selected, the City will provide this information to the GLO.

5. Report any/all sources of funding available for the proposed project:

Funding Source(s):

Amount(s):

Insurance Coverage (Multifamily Rental & Public Housing Only)

Yes No N/A

- 1. Did the applicant have insurance coverage on the proposed project? If YES, please provide the following information:
- 2. Name of the insurance company:
- 3. Did the applicant file a claim with the insurance company?
- 4. Amount of coverage:
- 5. Amount of insurance proceeds received or anticipated from the insurance company:
- 6. Was there a deductible?

If yes, how much was the deductible?

7. If the applicant had insurance coverage and a claim was not filed, why did the applicant not file a claim?

When a multifamily buyout property is identified and selected, the City will provide this information to the GLO.

8. The situation addressed in this application first occurred:

9. Are local or other funds available to completely address the situation instead of CDBG-DR funds?

10. What other state and/or federal agencies has the applicant contacted concerning funding of this project, and what were the results?

When a multifamily buyout property is identified and selected, the City will provide this information to the GLO.

11. Describe the impact of taking no action:

Taking no action will result in families being at risk of flooding in future disaster events.

CITIZEN PARTICIPATION DETERMINED THE NEEDS IN THIS APPLICATION BY:

Did the applicant provide reasonable advance notice for citizen participation? Yes No

List all opportunities where citizens, especially low-to-moderate income citizens of the target area, were given to participate in the determination of these needs:

Assessment Type: Public Hearing Assessment Date: 5/23/2017

Date of resolution authorizing application submission: _____

Assessment Type: Community Survey Assessment Date: 5/24/2017

Date of resolution authorizing application submission: _____

Assessment Type: Public Hearing Assessment Date: 8/30/2018

Date of resolution authorizing application submission: _____

PROJECT SUMMARY

The Project Summary consists of 4 parts **for each target area and/or activity**: (1) Summarize Problem(s) (2) Location and Acquisition (3) Detailed Actions to Address Problems and 4) Disclosure on Non-CDBG-DR Funds.

1. Summarize the problem(s) to be addressed within the application by target area.

Some homes are located in the floodway or other areas that are deep within the floodplain, and these areas have a high risk of flooding. The Housing Buyout Program will remove homes from the housing stock that are located in areas that have a high risk of flooding, which future flooding damages and housing displacement. Eligible homes may be multifamily or single family homes and may include public housing units that are located in hazard areas.

2. Identify the location of each activity/target area and any acquisition activity.

The spelling and capitalization of the Target Area name(s) listed here must match Table 1, e.g., "Green Acres" should not appear elsewhere as "green acres subdivision."

Project Title/Target Area
Housing Buyout Program

Activity
BP Buyout Program

-OR-

Provide a brief description of the location of the activity/target area, if possible.

Specific properties and/or target areas have not yet been determined. Only property impacted by a 2016 flood event is eligible. Property will be dedicated and maintained in perpetuity for use that is compatible with open space.

-OR-

Provide physical address if possible.

Specific properties and/or target areas have not yet been determined. Only property impacted by a 2016 flood event is eligible. Property will be dedicated and maintained in perpetuity for use that is compatible with open space.

Is a map of the service area project attached?

Yes No

3. Identify the action(s) to resolve the problem(s) and their anticipated outcomes. Include specific materials and quantities.

The Housing Buyout Program will remove approximately 250 homes from high flood risk areas. Only property impacted by the 2016 flood events is eligible. Property will be dedicated and maintained in perpetuity for use that is compatible with open space.

4. Disclose source(s) and use(s) of non-CDBG-DR funds:

Source of Funds	Amount	Use of Funds	+
None at this time	\$0.00	Project is not expected to exceed CDBG-DR allocation	x

ADDITIONAL PROJECT INFORMATION

1. Are there any persons with a reportable financial interest to disclose?

Yes No

PROJECT IMPLEMENTATION SCHEDULE

Enter the projected length in months of each phase below. If a phase is not applicable, enter "0" in the field. Most projects should be completed in 24 months, once the project contract between the applicant and the GLO is executed.

Procurement of Professional Services (may occur prior to application)	<input type="text" value="2"/>
Housing Guidelines Development/Outreach Plan, as applicable	<input type="text" value="1"/>
Broad Environmental Review	<input type="text" value="1"/>
Bid Advertisement/Contract Award	<input type="text" value="2"/>
Construction	<input type="text" value="0"/>
General Administration	<input type="text" value="16"/>
Audit & Closeout	<input type="text" value="2"/>

If the proposed project requires a schedule longer than 24 months, justification must be provided:

TABLE 1 - BUDGET Complete a separate table for each activity or target area.

Identify the target area for this project. Only one Table 1 is needed if the same target area, beneficiaries, and national objective apply. If any of these are different, add a new Table 1. Refer to the Application Guide for instructions.

Project Title/Target Area: Housing Buyout Program

Activity Description	Act Code	Total Units	LMI Units	LMI %	National Objective	CDBG-DR Amount	Other Sources	Activity Total
Buyout Program	BP	250	250	100.00%	LMI	23,486,698	0	23,486,698
ACTIVITY TOTALS:		0	0	0.00%	0	23,486,698	0	23,486,698

TABLE 2 - GRANT PROJECT BUDGET BREAKDOWN

Project Title/Target Area:

Housing Buyout Program

Activity Description	Act #	Description of Task	Explanation	Budget
Buyout Program	BP	Acquisition/Buyouts	Multifamily - cost of buyout acquisition/closing	\$9,250,000
Buyout Program	BP	Acquisition/Buyouts	Single Family - cost of buyout acquisition/closing	\$9,250,000
Buyout Program	BP	Other	Multifamily - relocation and associated costs	\$1,253,387
Buyout Program	BP	Other	Single Family - relocation and associated costs	\$1,253,387
Buyout Program	BP	Other	Project Delivery	\$838,312
Buyout Program	BP	Other	Demolition	\$1,121,879
Buyout Program	BP	Other	Landscaping	\$50,000
Buyout Program	BP	General Administration	Cost of application, oversight, monitoring	\$469,733
				\$23,486,698

NATIONAL PROGRAM OBJECTIVES

1. Activities benefiting low-to-moderate income persons.

Method(s) used to determine the beneficiaries:

LMI Area Benefit: LMI Housing Activity: LMI Limited Clientele: LMI Jobs:

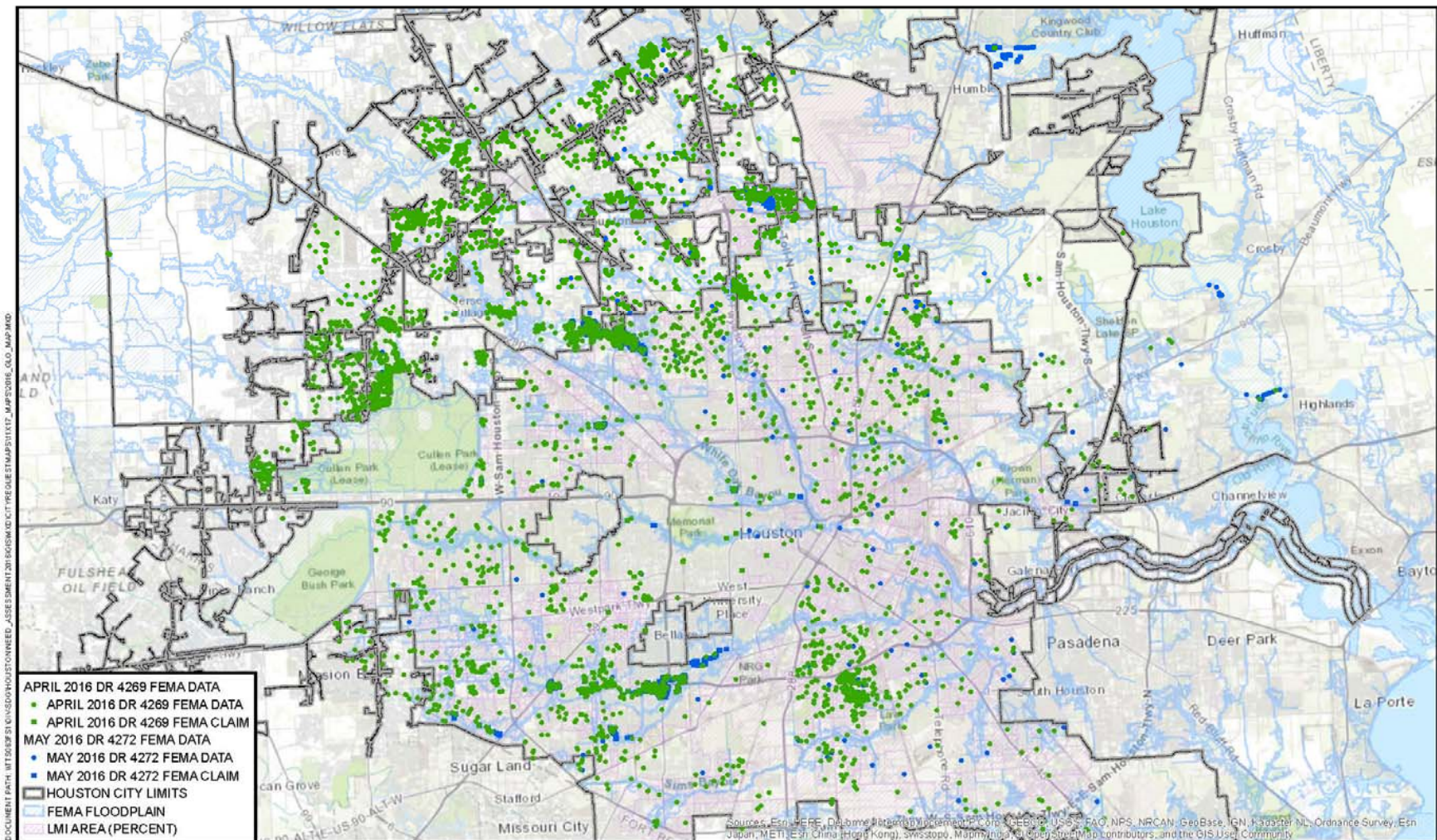
2. Prevention/Elimination of Slums or Blight.

3. Urgent Need

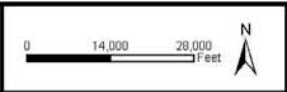
Justification of Beneficiary Identification Method:

The City of Houston will utilize assessment provided with Harris County MOD and FEMA data to identify areas or homes that are at risk of flooding again, were impacted by the 2016 flood events, and part of a City or County buyout strategy. The program will benefit an area where at least 51% of residents are low- and moderate-income.

Appendix




TBPE FIRM NO. F-3924
 www.tetratech.com
 2901 WILCREST DRIVE, STE. 400
 HOUSTON, TEXAS 77042
 PH 832.251.5160

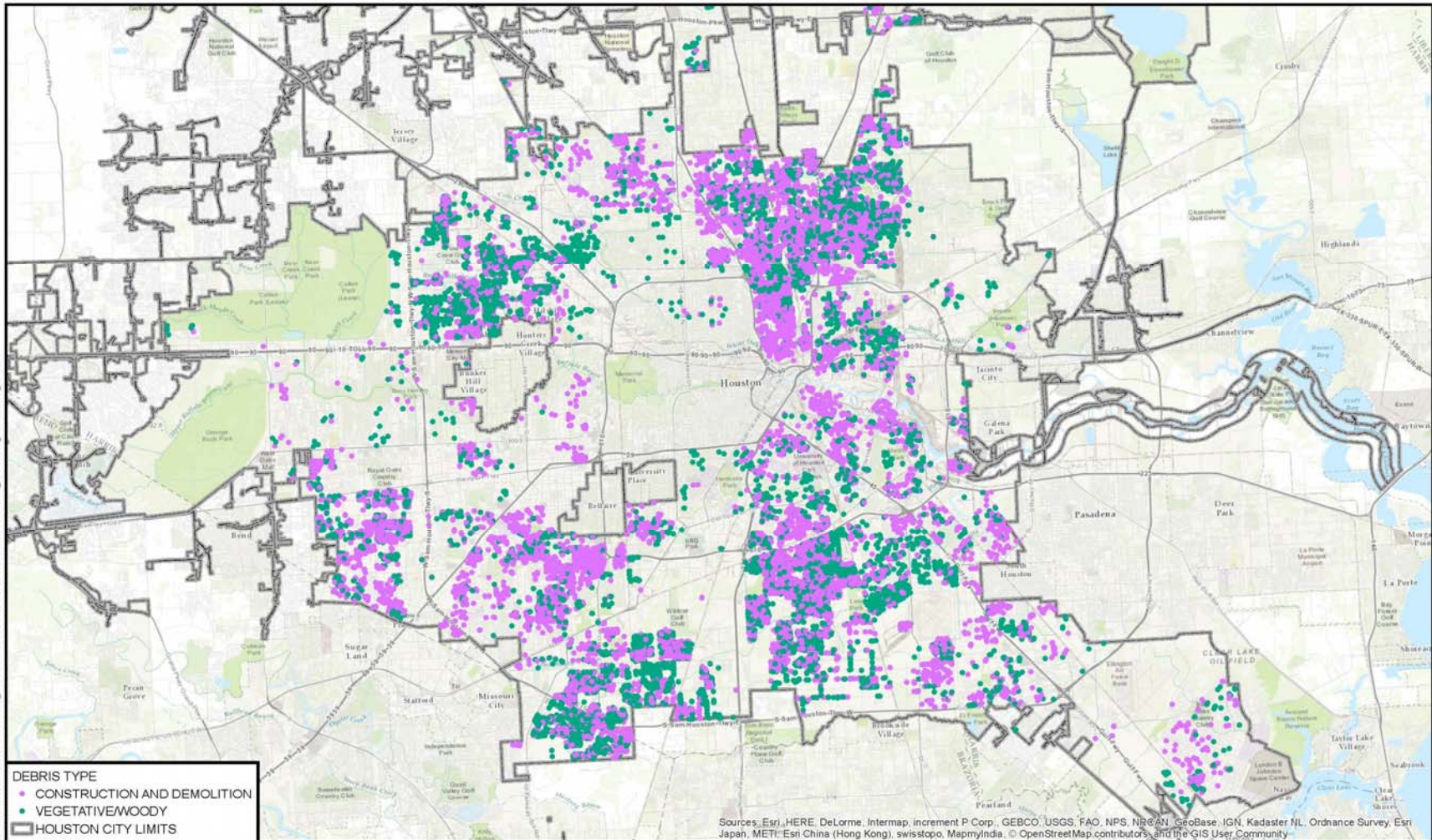



 CITY OF HOUSTON
 COBG-DR GRANT

CITY OF HOUSTON, TEXAS COBG-DR DATA COLLECTION AND ANALYSIS
**NEED ASSESSMENT 2016 FLOOD EVENTS
 WITH FEMA INDIVIDUAL ASSISTANCE DATA**
 NAD 1983 STATE PLANE TEXAS SOUTH CENTRAL FIPS 4204 FT

EXHIBIT
1

DOCUMENT PATH: O:\HOUSTON\NEED_ASSESSMENT\2016\GIS\MD\GICIT\REQUEST\MAPS\11\11_17_16_DEBRIS.DAT, MAPNAME



Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

DEBRIS TYPE

- CONSTRUCTION AND DEMOLITION
- VEGETATIVE/WOODY
- ▭ HOUSTON CITY LIMITS

Tetra Tech

TBPE FIRM NO. F-3924
 www.tetrattech.com
 2901 WILCREST DRIVE, STE. 400
 HOUSTON, TEXAS 77042
 PH 832.251.5160

0 10,000 20,000 Feet

N

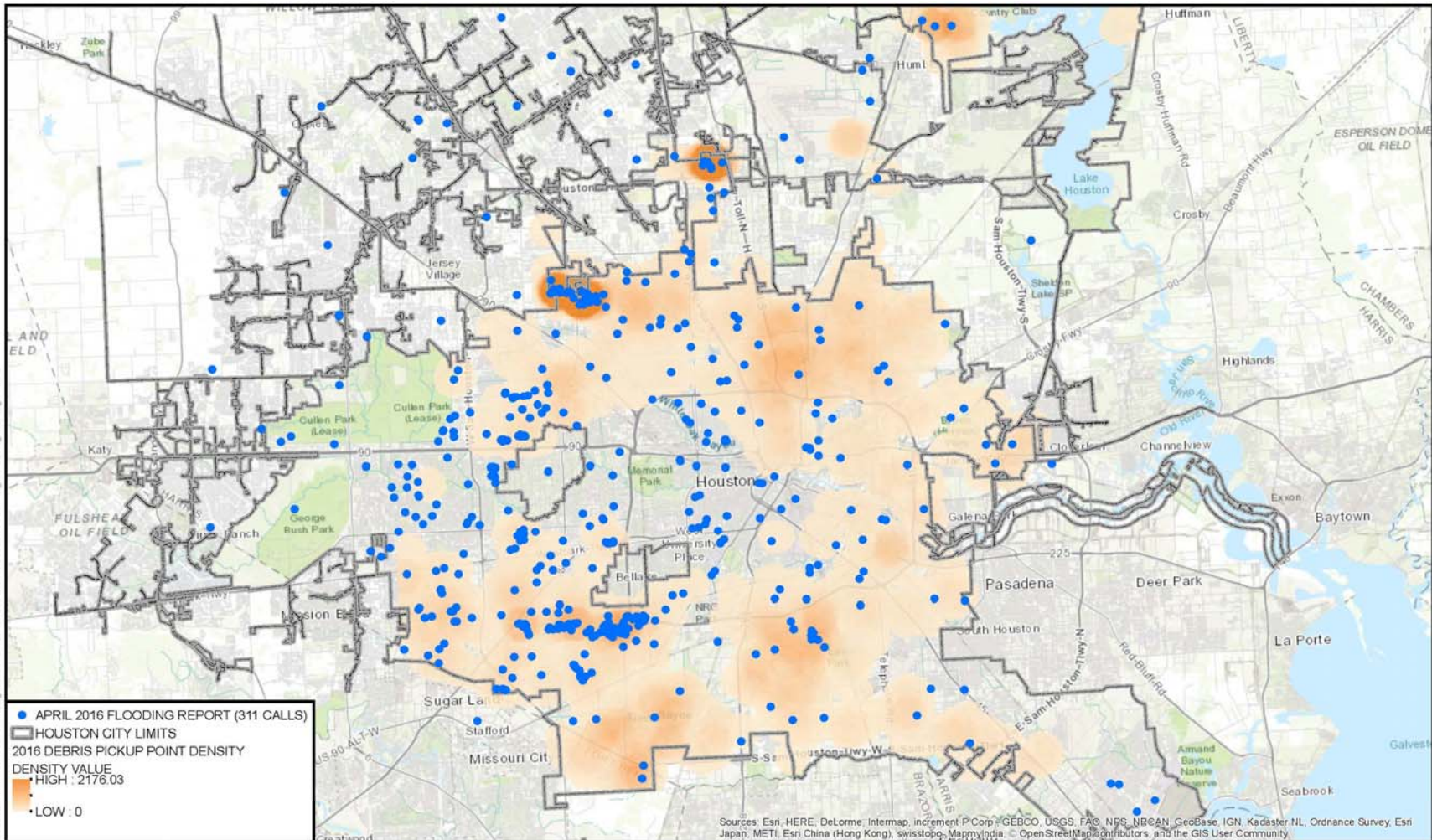
CITY OF HOUSTON
 CDBG-DR GRANT

CITY OF HOUSTON, TEXAS CDBG-DR DATA COLLECTION AND ANALYSIS
**NEED ASSESSMENT 2016 FLOOD EVENTS
 WITH DEBRIS DATA**

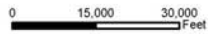
NAD 1983 STATE PLANE TEXAS SOUTH CENTRAL FIPS 4204 FT

EXHIBIT
2

DOCUMENT PATH: O:\HOUSTON\NEED_ASSESSMENT\PROG\MAC\DCIT\REQ\RESM\ST\WVT_AMPS\0316_1\TDC\A_JMP\MXD



TBPE FIRM NO. F-3924
www.tetrattech.com
2901 WILCREST DRIVE, STE. 400
HOUSTON, TEXAS 77042
PH 832.251.5160



CITY OF HOUSTON
CDBG-DR GRANT

CITY OF HOUSTON, TEXAS CDBG-DR DATA COLLECTION AND ANALYSIS
NEED ASSESSMENT 2016 FLOOD EVENTS
WITH 311 DATA

NAD 1983 STATE PLANE TEXAS SOUTH CENTRAL FIPS 4204 FT

EXHIBIT

3

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
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* 3. Date Received: _____	4. Applicant Identifier: _____
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5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
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State Use Only:

6. Date Received by State: _____	7. State Application Identifier: _____
---	---

8. APPLICANT INFORMATION:

*** a. Legal Name:**

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="746001164"/>	* c. Organizational DUNS: <input type="text" value="8324319850000"/>
--	--

d. Address:

* Street1:	<input type="text" value="601 Sawyer"/>
Street2:	<input type="text" value="P.O. Box 1562"/>
* City:	<input type="text" value="Houston"/>
County/Parish:	_____
* State:	<input type="text" value="TX: Texas"/>
Province:	_____
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="77251-1562"/>

e. Organizational Unit:

Department Name: <input type="text" value="Housing and Community Dev Dept"/>	Division Name: _____
--	--------------------------------

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: _____	* First Name: <input type="text" value="Tom"/>
Middle Name: _____	
* Last Name: <input type="text" value="McCasland"/>	
Suffix: _____	

Title: _____

Organizational Affiliation:

* Telephone Number: <input type="text" value="832-394-6282"/>	Fax Number: _____
--	--------------------------

*** Email:**

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Community Development Block Grant Disaster Recovery for 2016 Texas Floods

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="23,486,698.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="23,486,698.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:


* Signature of Authorized Representative: 

* Date Signed:

Attest/Seal:



City Secretary

Countersigned: 

City Controller 

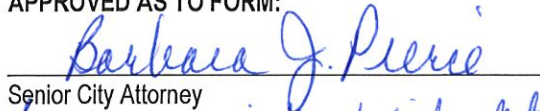
DATE OF COUNTERSIGNATURE: 9-20-, 2018

APPROVED:



Deputy Director
Housing and Community Development Department
On behalf of:
Director
Housing and Community Development Department

APPROVED AS TO FORM:



Senior City Attorney

Senior Assistant City Attorney

Certifications

Each applicant for CDBG Disaster Recovery funding must certify by signing Form 424 that local certifications included in this application guide have been followed in the preparation of any CDBG Disaster Recovery program application, and that they will continue to be followed in the event of funding. *(Note: False certification can result in legal action against the jurisdiction).*

Sections 91.225 and 91.325 of Title 24 of the Code of Federal Regulations are waived.

Each applicant must comply with the provisions of the National Environmental Policy Act, the Council on Environmental Quality regulations, the requirements set forth in title 24 of the Code of Federal Regulations (CFR) part 58, and applicable GLO-CDR policy directives. All applicable federal and state laws, including environmental, labor (Davis-Bacon), procurement procedures and contract requirements of 2 CFR 200.318–200.326, and civil rights requirements apply to the use of these funds. Each applicant certifies that:

- a. It has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG-DR program.
- b. It is in compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. It will comply with the acquisition and relocation requirements of the Uniform Act (URA), as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in the Federal Register notice.
- d. It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- e. It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each Unit of General Local Government (UGLG) receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
 - 1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2016 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.
- f. The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.

- g. It has adopted the following policies:
 - 1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
 - 2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- h. It will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government, or delineated as a Special Flood Hazard Area in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- i. Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- j. It will comply with applicable laws.

Houston Organizing Movement for Equity (HOME)

August 31, 2018

City of Houston Housing and Community Development
ATTN: Mary Itz
601 Sawyer, Suite 400
Houston, TX 77007
Submitted via email to mary.itz@houstontx.gov

RE: CDBG-DR – 16 funding of \$23,486,698.

Dear Ms. Itz:

The Houston Organizing Movement for Equity (HOME) Coalition commends the City and Mayor Turner's recognition that rebuilding a stronger, more resilient Houston cannot happen unless it is also a more equitable Houston. We understand that home and apartment buyouts are one strategy that the City is using to protect residents from flooding in the future.

The draft application as posted on the city's website is a start, but does not have the necessary details to be fully supported by our coalition. The HOME Coalition believes that the proposal can be strengthened by incorporating the recommendations to the plan and program design as listed below. We appreciate the City's ongoing commitment to listen to community voices as the recovery moves forward and stand ready to assist you in that work.

It is difficult to comment on a proposed program that does not include target areas or other information about how these target areas have been or will be selected. The application does not show which low and moderate income neighborhoods impacted by the 2016 storms will benefit from this funding.

We also note that while the application form encourages the City to specify how the proposed buyout program "considers an integrated approach to housing, Fair Housing obligations, infrastructure, economic revitalization, and overall community recovery . . . also document how the use of these funds will address long-term recovery" the responses by the City do not include consideration of several of these issues. We are particularly concerned about the failure to describe how equity, fair housing, and civil rights were integrated into program design. HOME is committed to the Right to Stay and the Right to Choose. Many of our recommendations below address how the program can comply with equity and civil rights obligations, as well as ensure a more successful recovery for Houston.

We offer the following recommendations for strengthening the City of Houston's draft Application for the Housing Buyout Program for CDBG-DR 16:

Prioritize low- and moderate-income families. The City should allocate 100% of the funding to families at 80% AMI and below. For a family of four in Houston, 80% AMI is \$59,900, almost four times the annual income of one breadwinner earning minimum wage. Low- and moderate-income families the least likely to have disposable income or other resources available to them and are the most housing cost-burdened.

Allocate funds proportionally by household income. We specifically want the City to commit to dividing all funding sources in each program activity by income categories. The brackets of LMI should follow the traditional 0-30%, 31-50%, 51-80% of AMI divisions and serve those categories proportionally based on estimates of households harmed in the storm.

Make buyouts fair for families. For homeowners, the buyout program should make people whole. In other words, no family should have to take on additional debt to relocate to a comparable home in a safer neighborhood. If a family owns a three bedroom home free and clear, the relocation funds they receive should be enough to purchase a three bedroom home free and clear in a location suitable to the family's needs with no threat of flooding. The HOME coalition insists that the City insure that the single family buyout program provide people at least the amount of funds proposed in the Harris County Community Services Department's draft document called "Disaster Recovery Buyout Program Guideline" dated June 26, 2018. HOME has attached that document to this letter for your convenience.

For renters, the buyout program should spend its money to make sure that renters who have to move either have a voucher (and a place that accepts that voucher) or is assisted in being able to rent a decent apartment in a safe neighborhood at a price that they can afford. The city should subsidize the rent at the new apartment if necessary. HOME want to make sure that the tenants are taken care of. We do not want our tax dollars spent so that landlords can profit.

Protect existing renters. The City should make sure that landlords do not evict people as part of this process before the tenants can avail themselves of relocation supports and benefits. To do this the City should obtain a list of tenants as soon as a buyout property is located, so that the City can insure that all tenants will be helped to move to a safer, decent and affordable unit. These protections should also be made available to undocumented families.

Extend rental availability and affordability. For any multifamily property bought out using CDBG-DR funds, additional affordable units must be created to replace the units bought out. These new units must be subject to a Land Use Restriction Agreement (LURA) requiring a 40 year minimum affordability period for affordable units. This 40 year period preserves affordability for developments that otherwise would be converted into market rate units in transitional areas over the course of time. In addition, moving costs and deposits should be covered for families that are required to move.

Prioritize intentional and ongoing community engagement. The City should proactively seek out partnership opportunities with community-led groups to better understand and address the needs of low-income people and communities of color. Community organizations should be at the heart of doing outreach and bringing people into the rehabilitation process. To ensure deep and rigorous community input, the HOME Coalition would like to meet with city staff and contractors designing the programs early and often, from the program design and the RFP stage to program completion. Additionally, we recommend the creation of a community engagement advisory board made up of community leaders to provide the City with regular input. We recommend prioritizing community leaders from the zip codes with high unmet needs as members of the advisory board .

We offer the following recommendations for program design and implementation:

Ensure the system is easily navigable through quality case management and transparency. One of the most challenging parts of the recovery for residents has been understanding programs, preparing paperwork, and applying for assistance. Information must be presented clearly and quality case managers must be available to assist in navigation. Residents and case managers must be able to easily know their status in recovery programs and understand eligibility, denials, and ability and the appeal process.

Ensure full support to families who will be bought out, whether renters or homeowners. The City should provide robust services to help people to overcome the barriers that will come up when people are required to move. For renters that means helping to locate and if necessary negotiate the landlords in decent and safe apartments near good schools. It would defeat the purpose of moving rental housing out of floodways and floodplains if the tenants were forced to remain in the same or similarly high-risk areas because of discrimination and the unavailability of rental housing in safer areas. For homeowners, that means helping to create clean titles (as necessary), bringing in realtors to help people choose their next homes who are specifically working to help people move to neighborhoods of opportunity that have not been historically disinvested, making sure people have good inspections before buying their next home, and so forth. The program after Ike proactively helped people to move to safer neighborhoods would be a good template for this needed support.

Offset the burden of insurance. We recommend that the Buyout Program funds pay for three years of flood insurance for recipient families for whom insurance is a significant financial strain (specifically households at 80% AMI and below), even for households relocated outside of floodplains, given the scope of Hurricane Harvey and increasing disaster risk

Repercussions for source-of-income discrimination. All rental properties receiving CDBG-DR funding must agree to take Housing Choice Vouchers and not to discriminate based on source of income. Landlords that are on record as refusing tenants with vouchers or otherwise discriminating based on source of income should be reported to the City of Houston's Office of the Inspector General or the Harris County District Attorney's office. The Land Use Restriction Agreement (LURA) placed on all rental properties receiving disaster recovery funds must set out income and rent restrictions; the affordability period; and requirements that all rental projects must accept Housing Choice Vouchers. In addition, the City should develop criteria to select projects for CDBG-DR funding that provide incentives to developers that increase the number of affordable units, the length of the affordability period, the set-asides for the lowest income tenants, and/or the number of units accessible to people with disabilities beyond the targets established by the needs assessment, Action Plan, and other program documents.

Again, thank you for the opportunity to provide comments to the City's 2016 Housing Project Application. We look forward to continuing to collaborate to bring about an equitable recovery.

Sincerely,

HOME Coalition Members:

Texas Organizing Project
Workers Defense Project
Texas Gulf Coast Area Labor Federation
Texas Appleseed
Texas Environmental Justice Advocacy Services
Service Employees International Union
Plumbers Local Union 68
Texas Building and Construction Trades Council
Houston Gulf Coast Building and Construction Trades Council
Laborers International Union of North America, LIUNA Local 350 and the Southwest Laborers District Council
International Brotherhood of Electrical Workers
Local 716 International Union of Painters and Allied Trades, District Council 88

West Street Recovery
FIEL Houston
Faith in Texas
Air Alliance
Sierra Club Houston
Coalition of Community Organizations
S.A.F.E. Diversity Communities
Living Hope Wheelchair Association
Action CDC

CC: Mayor Sylvester Turner
Tom McCasland, Director, Housing and Community Development
Myra Bontemps, Assistant Director, Recovery and Public Services
Sarah Labowitz, Senior Advisor on Recovery

Encl: Harris County draft of Disaster Recovery Buyout Program Guideline



CITY OF HOUSTON

Housing & Community Development Department

Sylvester Turner

Mayor

Tom McCasland
Director
601 Sawyer, Suite 400
Houston, Texas 77007

T. (832) 394-6200
F. (832) 395-9662
www.houstontx.gov/housing

Liz Wolff
HOME Coalition
2404 Caroline Street
Houston, TX 77004

September 11, 2018

Re: Comments on the City of Houston Draft Application for CDBG-DR16

Dear ^{Liz}Ms. Wolff:

Thank you for submitting comments on the Housing Buyout Program Application for Community Development Block Grant Disaster Recovery funds for the 2016 flood events (CDBG-DR16), received on August 30, 2018. We greatly appreciate the HOME Coalition's participation in the disaster recovery funding process and hope for a continued partnership throughout program implementation.

We have updated the application to include a priority for low- and moderate-income households or low- and moderate-income areas for housing buyout activities. According to the Texas General Land Office's (GLO) guidance for subrecipients, income bracket targeting is not a part of the application, but your suggestions will be taken under consideration as additional program documents are produced.

We agree that City-funded buyout activities should not place undue hardship on households impacted by flooding. As program documents are developed, we will consider various strategies, which may include incentive payments, moving costs, deposits, and other relocation assistance, to help residents relocate to a safe, suitable and comparable home and neighborhood with no additional financial burden imposed on them as a result of participating in the program. As buyout properties are identified, the City of Houston will take steps to ensure that landlords do not evict tenants. Undocumented families are not eligible for relocation assistance due to federal regulations; however, some families may be eligible to apply for another type of assistance during the relocation process.

HCDD's proposal to use the CDBG-DR16 allocation for a housing buyout program allows the City to use disaster recovery funds strategically to buyout properties with high flooding risk. To increase the affordable housing stock, the City is using other funding, including entitlement and disaster recovery grants, to build new affordable homes in areas with reduced risk of flooding. The City is also looking for innovative ways to retain long-term affordability of homes.

HCDD is fully committed to community engagement in the long-term disaster recovery process and thanks all the organizations in the HOME Coalition that partnered with HCDD this summer on community engagement efforts for disaster recovery. We will explore ways in which we can incorporate your suggestions for the goal of intentional community engagement throughout this process.

We appreciate your recommendations for program design and implementation. These will be considered as additional program materials are produced. HCDD looks forward to continuing its partnership with the HOME Coalition, other community organizations, and residents as public engagement continues to inform program guidelines and the implementation of all disaster recovery programs.

You may visit our website at www.houstontx.gov/housing for more information about upcoming public meetings and announcements regarding the disaster recovery funding.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Tom", with a stylized flourish at the end.

Tom McCasland
Director