

Texas CDBG-MIT Counties & ZIPs by Disaster Year & HUD MID

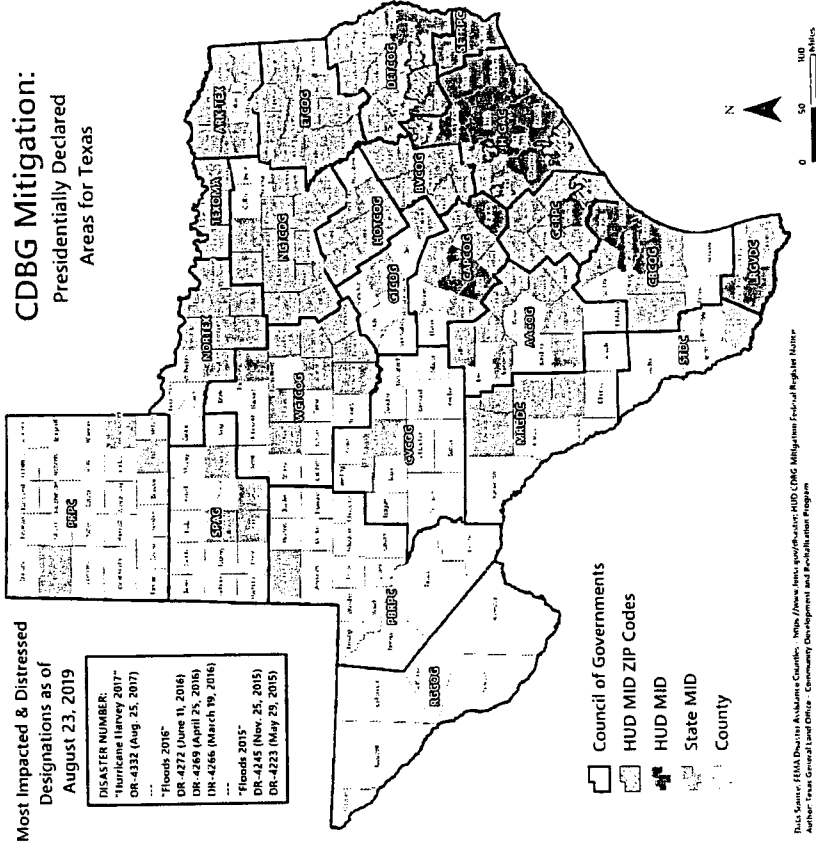
County	2015	2016	Harvey (2017)	HUD MID
Hardin	2015	2016	HUD MID	HUD MID
Harris	HUD MID	HUD MID	HUD MID	HUD MID
Harrison	2015	2016	-	-
Hartley	2015	-	-	-
Hays	HUD MID	-	-	HUD MID
Henderson	2015	2016	-	-
Hidalgo	HUD MID	2016	-	HUD MID
Hill	2015	-	-	-
Hood	2015	2016	-	-
Hopkins	2015	-	-	-
Houston	2015	2016	-	-
Jack	2015	-	-	-
Jackson	-	-	Harvey (2017)	-
Jasper	2015	2016	HUD MID	HUD MID
Jefferson	-	-	HUD MID	HUD MID
Jim Wells	2015	-	Harvey (2017)	-
Johnson	2015	-	-	-
Jones	2015	2016	-	-
Karnes	-	-	Harvey (2017)	-
Kaufman	2015	-	-	-
Kendall	2015	-	-	-
Kleberg	-	2016	Harvey (2017)	-
Lamar	2015	2016	-	-
Lavaca	-	-	Harvey (2017)	-
Lee	2015	2016	Harvey (2017)	-
Leon	2015	2016	-	-
Liberty	2015	2016	HUD MID	HUD MID
Limestone	-	2016	-	-
Lubbock	2015	-	-	-
Lynn	2015	-	-	-

County	2015	2016	Harvey (2017)	HUD MID
Madison	2015	2016	Harvey (2017)	-
Marion	-	2016	-	-
Matagorda	-	-	Harvey (2017)	-
McLennan	2015	-	-	-
Milam	2015	2016	Harvey (2017)	-
Montague	2015	-	-	-
Montgomery	2015	HUD MID	HUD MID	HUD MID
Nacogdoches	2015	-	-	-
Navarro	2015	2016	-	-
Newton	2015	HUD MID	HUD MID	HUD MID
Nueces	2015	-	HUD MID	HUD MID
Orange	2015	2016	HUD MID	HUD MID
Palo Pinto	2015	2016	-	-
Parker	2015	2016	-	-
Polk	2015	2016	Harvey (2017)	-
Real	2015	-	-	-
Red River	2015	2016	-	-
Refugio	2015	-	HUD MID	HUD MID
Robertson	2015	-	-	-
Rusk	2015	-	-	-
Sabine	2015	2016	Harvey (2017)	-
San Augustine	2015	2016	Harvey (2017)	-
San Jacinto	2015	2016	HUD MID	HUD MID
San Patricio	-	-	HUD MID	HUD MID
Shelby	2015	2016	-	-
Smith	2015	2016	-	-
Somervell	2015	2016	-	-
Starr	2015	-	-	-
Stephens	-	2016	-	-
Tarrant	2015	-	-	-

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County	2015	2016	Harvey (2017)	HUD MID
Throckmorton	2015	2016	-	-
Tom Green	2015	-	-	-
Travis	HUD MID	2016	-	HUD MID
Trinity	2015	2016	-	-
Tyler	2015	2016	Harvey (2017)	-
Upshur	-	2016	-	-
Uvalde	2015	-	-	-
Van Zandt	2015	2016	-	-
Victoria	2015	-	HUD MID	HUD MID
Walker	2015	2016	Harvey (2017)	-
Waller	2015	2016	Harvey (2017)	-
Washington	2015	2016	Harvey (2017)	-
Wharton	2015	2016	HUD MID	HUD MID
Wichita	2015	-	-	-
Willacy	2015	-	-	-
Williamson	2015	-	-	-
Wilson	2015	-	-	-
Wise	2015	-	-	-
Wood	-	2016	-	-
Young	2015	-	-	-
Zavala	2015	-	-	-

HUD MID ZIPs	
75979	77493
77320	77482
77335	77423
77351	77979
77414	78934



Website: <https://recovery.texas.gov/>

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Date: February 4th, 2020
Subject: TXGLO Monthly Elected Officials Conference Call
From: GLO-CDR Intergovernmental Relations

Preface

Jonah Chen, Manager of CDR Intergovernmental Relations (jonah.chen.glo@recovery.texas.gov)

Heather Lagrone, Senior Deputy Director of Community Development and Revitalization (CDR)
(heather.lagrone.glo@recovery.texas.gov)

Announcement: The GLO invites small businesses impacted by Hurricane Harvey in the 49-county impact area to join the GLO for a webinar on the Texas Back in Business program. The informational webinar will cover the program's grant opportunities for small businesses recovering from Hurricane Harvey. To learn more, please visit TexasBackinBusiness.com and recovery.texas.gov/tbib.

- **Updates on Harvey Programs**
 - **Multifamily Affordable Rental Program:** Construction of multifamily developments is ongoing. There are currently 8 under construction. When we are finished, we will have allocated \$135 million in order to construct 68 developments containing a total of 4,857 individual units.
 - **HAP:** Applications for this program closed on December 31st, 2019. So far, 592 families have been moved into new homes; approximately 800 more applications have been approved, and approximately 800 applications are currently under construction.
 - **HRP:** Applications for this program closed on December 31st, 2019. Approximately \$40 million has been paid out to applicants.
 - **Buyouts/Acquisitions and Infrastructure:** We received a total of 204 viable applications. 83 have contracts that are fully executed and another 162 are currently in the contracting phase.
 - **Texas Back in Business:** The program offers grants to small businesses impacted by Hurricane Harvey in the 49-county impact area. We have already received 1,400 applications. The window to apply will end on March 2, 2020. Please join the GLO and TBIB for a webinar on the program on Wednesday February 12th at 2:00pm. Check TexasBackinBusiness.com and recovery.texas.gov/tbib for further information.
- **CDBG-Mitigation (CDBG-MIT)**
 - The GLO submitted the Mitigation Action Plan to HUD last week on January 31st, 2020. The GLO received approximately 4,000 public comments from around 900 individuals. After carefully considering this public input, the GLO has made three significant changes to the Action Plan before we submitted it to HUD. These changes are as follows:
 1. Instead of limiting each jurisdiction to submitting 3 applications, they will now be able to submit 6 total applications: 3 individual applications and 3 joint



applications (joint applications consisting of two applicants partnering up to submit their application for a single project).

2. The minimum project cost was lowered from \$5 million to \$3 million.
3. Instead of waiting for all first-round applications to be submitted before moving forward to second-round applications, the GLO will use the scoring criterium in order to give more consideration to the quality of applications. The GLO will use a minimum score when determining whether a jurisdiction's first application will move forward. After the first application moves forward and if there are remaining funds, the jurisdiction can pursue a second application.

- **2018/2019 Federal Register**

- Published on 2/3/2020, a newly-released Federal Register allocated \$285 million in CDBG-DR to certain areas impacted by the flooding events and tropical storm from 2018 and 2019. This money will primarily be going to the RGV and the Imelda impact area.
- HUD is requiring the GLO to create two Action Plans for these funds. The Federal Register was just released yesterday, so the development of the two Action Plans are still the very early stage. It will still be some time before these Action Plans are open to receive public comment. We can, however, tell you that HUD wants these funds to be used to address housing needs before addressing infrastructure or other needs.
- Programs for 2018/2019 CDBG-DR will likely be very similar to the Harvey housing programs: HAP, HRP, Multifamily, and Buyouts.

- **Upcoming Training Opportunities**

- Please watch for training meant to help identify cases of fraud, waste, and abuse in federal programs. As soon as we finalize some details with the Office of the Inspector General at HUD, we will be sending you all of the details. For right now, we can tell you it will be the last week of February in Austin, TX.

- **Q&A (answers provided by Heather Lagrone)**

- Question: Are Cameron and Willacy County eligible to receive Harvey funds?
- Answer: Unfortunately, no. HUD determined the Most Impacted and Distressed (MID) and State Most Impacted and Distressed (SMID) in their Federal Register. Cameron County and Willacy County were not designated as MID or SMID.

- Question: Is there a summary of the changes to the State Action Plan?
- Answer: The three changes are summarized in the notes above. For more detail, please visit the recovery.texas.gov webpage for the submitted and updated version of the CDBG-MIT State Action Plan.

- Question: I am just confirming that the 2018/2019 CDBG-DR funds are going to be used primarily for housing.



Meeting Notes

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- Answer: Yes, that is correct. HUD intends for the \$285 million in CDBG-DR funds tying back to the events of 2018/2019 to be used for housing before any other unmet needs are addressed.
- Question: Are the 2018/2019 funds CDBG-DR or CDBG-MIT?
- Answer: They are CDBG-DR.
- Question: Will the mitigation MODS be constructed and guided similarly to the DR Harvey MODs?
- Answer: Yes—they will be very similar to what you have seen in the past.
- Question: If funds are still left over at the conclusion of a program, what will happen?
- Answer: We will either re-open applications for that program or we will draft an Action Plan Amendment in order to repurpose those funds.
- Question: Regarding fire stations—am I correct in that we can harden an existing station, but we cannot build a new one from scratch?
- Answer: Yes, you are correct; however, you would be required to explain how your project contributes to the mitigation mission in formal communication. The GLO can assist with this.
- Question: When will the MIT competitions start accepting applications?
- Answer: If HUD approves our Action Plan within the allotted 60-day time period, we would be able to open applications in April or May.
- Question: Who will administer funds for the 2018/2019 housing programs?
- Answer: That has not yet been determined.
- Question: Can we elevate homes with MIT funds.
- Answer: Yes, however it is difficult to implement a purely elevation-focused program without including a home improvement component (hardening the home).
- Question: How do I get on the email list to receive these updates?
- Answer: You can email jonah.chen.glo@recovery.texas.gov to request to be added to the CDR-Intergovernmental Relations email distribution list.



Meeting Notes

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Need more information?

Please feel free to reach out to Jonah Chen at the Texas General Land Office for additional information related to the TXGLO Hurricane Harvey recovery programs.

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4.3 Program Budget

Figure 4-1: Program Budget

Programs	HUD Most Impacted and Distressed	State Most Impacted and Distressed	Total Allocation	% of Total Allocation
2015 Floods State Mitigation Competition	\$ 23,048,475	\$ 23,048,475	\$ 46,096,950	11.1
2016 Floods State Mitigation Competition	\$ 73,840,380	\$ 73,840,380	\$ 147,680,760	34.8
Hurricane Harvey State Mitigation Competition	\$ 1,072,388,360	\$ 1,072,388,360	\$ 2,144,776,720	49.1
Regional Mitigation Program	\$ 400,000,000	\$ 100,000,000	\$ 500,000,000	11.8
AACOG	\$ -	\$ 12,805,000	\$ 12,805,000	2.9
BVCOG	\$ -	\$ 10,729,000	\$ 10,729,000	2.5
CAPCOG	\$ 10,765,000	\$ 11,623,000	\$ 22,388,000	4.9
CBCOG	\$ 64,057,000	\$ 12,870,000	\$ 76,927,000	15.9
CTCOG	\$ -	\$ 2,900,000	\$ 2,900,000	0.6
DETCOG	\$ 54,829,000	\$ 14,384,000	\$ 69,213,000	13.1
GCRPC	\$ 18,273,000	\$ 16,139,000	\$ 34,412,000	6.8
HGAC	\$ 190,860,000	\$ 18,550,000	\$ 209,410,000	41.1
SETRPC	\$ 61,216,000	\$ -	\$ 61,216,000	12.2
HMGP: Supplemental	\$ 85,000,000	\$ 85,000,000	\$ 170,000,000	3.9
Coastal Resiliency Program	\$ 100,000,000	\$ -	\$ 100,000,000	2.3
Housing Oversubscription Supplemental	\$ 320,000,000	\$ 80,000,000	\$ 400,000,000	9.1
Resilient Home Program	\$ 80,000,000	\$ 20,000,000	\$ 100,000,000	2.3
State Project Delivery	\$ 64,457,835	\$ 64,457,835	\$ 128,915,670	3.0
Hazard Mitigation Plans	\$ 15,000,000	\$ 15,000,000	\$ 30,000,000	0.7
Resilient Communities Program	\$ 50,000,000	\$ 50,000,000	\$ 100,000,000	2.3
Regional and State Planning	\$ 107,429,725	\$ 107,429,725	\$ 214,859,450	5.0
State Administration	\$ 107,429,725	\$ 107,429,725	\$ 214,859,450	5.0
Total	\$ 2,498,594,500	\$ 1,798,594,500	\$ 4,297,189,000	100.0



4.4.4 REGIONAL MITIGATION PROGRAM (COG MODS)

Under the Regional Mitigation program (COG MODs), each COG region impacted by Hurricane Harvey has been allocated funds. Each COG will develop a local MOD for allocation of funds to local units of government and Indian tribes. The GLO encourages the prioritization of regional investments with regional impacts in risk reduction for hurricanes, tropical storms and depressions, flooding, wind and other hazards to develop disaster-resistant infrastructure; upgrading of water, sewer, solid waste, communications, energy, transportation, health and medical, and other public infrastructure to address specific, identified risks; financing multi-use infrastructure; and green or natural mitigation infrastructure development.

Due to the nature of this activity, this program will be administered by the GLO, with local units of governments (cities and counties) as subrecipients.

The MOD developed through the COGs allows for the opportunity for local quantifiable factors for the distribution of funds. Given the size of the impacted area, how disaster impact each region differently, and the risks in each region, local control through a regional approach is vital for a comprehensive mitigation approach.

The GLO will provide training, written guidance, and required forms to the impacted COGs for the development of the local MODs. Each COG will be provided data sets produced by the GLO to inform the MOD. Variances from these data sets will be allowable upon approval from the GLO. Data sets provided by the GLO may contain information at the county, city, and/or ZIP code level.

Local MOD guidelines will require that each COG follow a citizen participation process. Each COG is required to publish notice of any public hearings prior to holding the hearings. Notices shall be published in all newspapers of record for all eligible counties in the region, posted on the COG website, and provided to all eligible cities, counties, and Indian tribes in the region. Hearings must fully comply with the Texas Open Meetings Act.

The GLO will review and provide preliminary approval to each MOD prior to its posting by the COG for public comment. The MOD shall be posted on the COG's website for public comment prior to formal submission to the GLO. The public comment period shall be no less than 15 days. Each comment shall be responded to and any changes made to the MOD shall be noted in the response section for GLO review. The GLO will set the due date for completion of the MODs.

Upon completion, the GLO will review and approve MOD submissions by each COG. All MODs will be wholly reviewed to ensure that each COG provides a detailed description of the methodology used to allocate and prioritize funds within their regions. If the MOD is not approved, the GLO will provide feedback to the COG, including specific issues.



The GLO used census data, the composite disaster index (CDI), SoVI, and property tax data from the state comptroller's office to distribute funds to the impacted COG regions. The MOD distribution factors establish a balance between the risk faced by communities from natural hazards, the vulnerability of the population in eligible communities, the financial capacity to recover, and the relative population. The methodology for the distribution and calculation is located the Appendix F.

4.4.4.1 *Connection to Identify Risk:*

As outlined in Mitigation Needs Assessment, hurricanes/tropical storms/tropical depressions, and severe coastal/riverine flooding are the top two severe risks Texas experiences. Each proposed project must mitigate against one of these identified risks.

4.4.4.2 *Allocation Amount: \$500,000,000*

- i. At least fifty (50) percent of funds must address identified risks in the Hurricane Harvey HUD MID areas (counties and HUD MID zip codes counties);
- ii. Up to fifty (50) percent of funds may address identified risks in the Hurricane Harvey State MID areas (counties); and
- iii. Additional areas within counties not explicitly cited as eligible may also become locations of CDBG-MIT funded activities if it can be demonstrated how the expenditure of CDBG-MIT funds in that area will measurably mitigate risks identified within an eligible area (e.g., upstream water retention projects to reduce downstream flooding in an eligible area).

4.4.4.3 *Maximum Award Amount:*

The maximum award will be determined by the local MOD.

4.4.4.4 *Eligible Entities: Units of local government (cities and counties) and Indian Tribes*

4.4.4.5 *Local MOD Requirements:*

- i. Each COG will facilitate the MOD process with GLO support;
- ii. Establish objective criteria for allocation of funds to eligible entities or activities;
- iii. Citizen participation process;
- iv. Develop a citizen participation plan;
- v. GLO will review and provide preliminary approval to MOD prior to COG's public comment period;
- vi. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;



- vii. One (1) public hearing shall be a "Public Planning Meeting;"
- viii. Ensure a public comment period of at least 15 days;
- ix. Implement a minimum of \$3,000,000 in CDBG-MIT funds to any local entity receiving funding through the MOD;
- x. Ensure a minimum percentage of funds are allocated to Hurricane Harvey HUD MID Counties and ZIP codes;
- xi. Facilitate local prioritization through the MOD;
- xii. Connection to regional mitigation needs assessment and risk;
- xiii. Identify set asides for regional mitigation priorities and regional projects;
- xiv. Identify Covered Project(s);
- xv. A plan to meet the 50 percent LMI benefit requirement; and
- xvi. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

4.4.4.6 *Eligible Activities: All activities allowed under CDBG-MIT; HCDA Section 105(a) (1-5), 105(a) (7-9), and 105(a)(11), including but not limited to:*

- i. Flood control and drainage improvements, including the construction or rehabilitation of stormwater management system;
- ii. Infrastructure improvements (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- iii. Natural or green infrastructure;
- iv. Communications infrastructure;
- v. Public facilities;
- vi. Buyouts or Acquisition with or without relocation assistance, down payment assistance, housing incentives, and demolition;
- vii. Activities designed to relocate families outside of floodplains;
- viii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services);
- ix. FEMA Hazard Mitigation Grant Program (HMGP) cost share for CDBG-MIT eligible project;
- x. Economic development (assistance to businesses for the installation of disaster mitigation improvements and technologies; financing to support the development of technologies, systems and other measures to mitigate future disaster impacts;



“hardening” of commercial areas and facilities; and financing critical infrastructure sectors to allow continued commercial operations during and after disasters); and

- xi. Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or 3 feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least 3 feet above the 100-year floodplain elevation. Critical Actions are defined as an “activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.” For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

4.4.4.7 *Ineligible Activities:*

- i. Emergency response services. Emergency response services shall mean those services that are carried out in the immediate response to a disaster or other emergency in order to limit the loss of life and damage to assets by state and local governmental and nongovernmental emergency public safety, fire, law enforcement, emergency response, emergency medical (including hospital emergency facilities), and related personnel, agencies, and authorities;
- ii. CDBG-MIT funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG-MIT funds for levees and dams are required to:
 - a. Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
 - b. Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
 - c. Ensure the structure is accredited under the FEMA NFIP; and
 - d. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.



- iii. Funds may not be used to assist a privately owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a coop or municipally owned utility);
- iv. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- v. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG-MIT funds that may be contributed to a USACE project is \$250,000 or less;
- vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for "repair, replacement, or restoration" for damage to any personal, residential, or commercial property if that person at any time has received federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement;
- vii. If the property is purchased through the use of eminent domain, the ultimate use of that property may not benefit a particular private party and must be for a public use; eminent domain can be used for public use, but public use shall not be construed to include economic development that primarily benefits private entities; and
- viii. Incentive payments to households that move to disaster-impacted floodplains.

4.4.4.8 *Program Guidelines for Residential Buyout or Acquisition Activities (Only):*

Each subrecipient will develop guidelines in accordance with CDBG-MIT requirements and regulations to set maximum assistance amounts, target area locations, Disaster Risk Reduction Area, and additional eligibility requirements. Guidelines must be posted for public comment before use. The GLO must approve all guidelines. Subrecipients are required to develop and follow a RARAP. Subrecipients may adopt program guidelines used for the local buyout and acquisition program under administered under the State of Texas Plan for Disaster Recovery: Hurricane Harvey for \$5.676 billion in CDBG-DR funding. With respect to the buyout of properties, an "intended, planned, or designated project area," as referenced at 49 CFR 24.101(b)(1)(ii), shall be an area for which a clearly defined end use has been determined at the time that the property is acquired, in which all or substantially all of the properties within the area must be acquired within



an established time period as determined by the grantee or acquiring entity for the project to move forward.

To conduct a buyout in a Disaster Risk Reduction Area, the subrecipient must establish criteria in its policies and procedures to designate the area subject to the buyout, pursuant to the following requirements:

- i. The hazard must have been caused or exacerbated by the Presidentially declared disaster for which the grantee received its CDBG-MIT allocation;
- ii. The hazard must be a predictable environmental threat to the safety and well-being of program beneficiaries, as evidenced by the best available data (e.g., FEMA RL Data) and science;
- iii. The Disaster Risk Reduction Area must be clearly delineated so that HUD and the public may easily determine which properties are located within the designated area. The distinction between buyouts and other types of acquisitions is important, because subrecipient may only redevelop an acquired property if the property is not acquired through a buyout program (i.e., the purpose of acquisition was something other than risk reduction); and
- iv. In carrying out acquisition activities, subrecipient must ensure they are in compliance with their long-term redevelopment plans.

4.4.4.9 *Project Eligibility:*

- i. Meets the definition of mitigation activities;
- ii. Addresses the current and future risks identified; Mitigation related to Hurricanes, Tropical Storms and Tropical Depressions, and Severe Coastal and Riverine Flooding;
- iii. Meets the definition of a CDBG-eligible activity under title I of HCDA or otherwise pursuant to a waiver or alternative requirement;
- iv. Meets a CDBG national objective;
- v. Includes a plan for the long-term funding and management of the operations and maintenance of the project; and
- vi. Cost verification controls must be in place to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.



4.4.4.10 *National Objectives:* UNM, LMI, low/mod buyout (LMB), and low/mod incentive; at least fifty (50) percent of funds must benefit LMI persons.

4.4.4.11 *AFFH Review:*

All proposed projects will undergo AFFH review by the GLO before approval. Such review will include assessments of (1) a proposed project's area demography, (2) socioeconomic characteristics, (3) housing configuration and needs, (4) educational, transportation, and health care opportunities, (5) environmental hazards or concerns, and (6) all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard-related impacts.

4.4.4.12 *Timeline:*

The proposed program start date is 1 month after HUD's approval of this Action Plan. The proposed end date is 6 years from the start date of the program.

The State Of Texas §
County of Sabine §

I hereby certify that these documents were filed and duly recorded in the Commissioner Court Minutes of Sabine County, Texas.



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Janice McDaniel ~ County Clerk
By: Angie Dorsey
Deputy

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