



CITY OF HOUSTON

Sylvester Turner

Mayor

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February 11, 2022

Houston Galveston Area Council
3555 Timmons Lane, Suite 120
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Dear Houston-Galveston Area Council Board of Directors,

On February 9, the Houston-Galveston Area Council's (H-GAC) Water Resources Committee met to discuss a Method of Distribution (MOD) for the \$488 million of Community-Development Block Grant Mitigation (CDBG-MIT) funding apportioned to H-GAC. We appreciate the H-GAC staff, the board, and the Water Resources Committee members for working to address flooding in our region. The process of dividing up a limited pot is challenging.

We fully understand that H-GAC is a regional board and must look out for the entire region; however, we expect the distribution of funds to be fair and proportional to the representative jurisdictions. When it comes to flooding, it is Houston – the most populous city in the region – that has borne its undue share of the burden. The 2015 and 2016 floods impacted 26,000 homes. In 2017, Hurricane Harvey saw nearly 100,000 homes flooded in Houston and an estimated \$16 billion in residential damage. Much of this damage occurred in older, low-and moderate-income (LMI) neighborhoods with poor urban drainage infrastructure.

Of the five scenarios considered at the recent Water Resources Committee meeting, none apportioned funding in a way that was fair and proportional to Houston. The MOD scenario to be voted on by the H-GAC board of directors on Tuesday, February 15, allocates only 1.9 percent of H-GAC's \$488 million CDBG-MIT dollars to Houston. All five scenarios discussed unfairly weighted the proposed, and not yet approved, \$750 million direct allocation to Harris County when calculating shares for cities within Harris County.

On January 7, 2022, the Department of Housing and Urban Development rejected the General Land Office's amendment allocating the \$750 million. Should the revised State Action Plan allocating these funds be approved, there remains uncertainty in Harris County's plan and what factors the county will consider in its own MOD. The current deficit in Harris County's flood control bond program exceeds the amount the county will potentially receive, making it unlikely there will be excess funds to send to cities in the county. Further, the urban drainage projects that are the focus of the City of Houston are not the same as the regional drainage projects managed by Harris County. The City of Houston's projects focus on increasing storm drainage infrastructure in neighborhoods that outfall into channels. Harris County's projects focus on improving the channels – adding capacity and protecting against riverine flooding. While closely related, urban and regional drainage infrastructure projects are very different.

Furthermore, the MOD scenario being advanced to the board includes a \$62 million regional set-aside, with projects selected from the Tier 1 and Urgent Needs categories of H-GAC's Priority Flood Mitigation Project List. Although the projects have merit, none provide any benefit to the City of Houston or Harris County.

Lastly, we do not support H-GAC's decision to seek a waiver lowering the LMI requirement from fifty percent to forty-four percent. The Community Development Block Grant program, by its very design, was meant to focus on helping low-and moderate-income communities. All five of the projects the City of Houston submitted to the GLO's state mitigation competition were focused in high LMI concentrated areas.

We ask the board to reject the scenario put forth by the Water Resources Committee and devise a new MOD which more appropriately allocates this funding to the most impacted areas.

Sincerely,



Sylvester Turner
Mayor



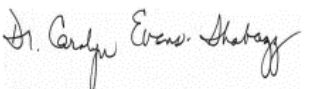
Amy Peck
City Council, District A



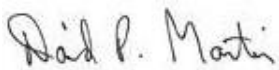
Tarsha Jackson
City Council, District B



Abbie Kamin
City Council, District C



Carolyn Evans-Shabazz
City Council, District D



Dave Martin
City Council, District E



Tiffany D. Thomas
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