



Community Flood Resilience Task Force
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May 30, 2022

Harris County Community Services Department (HCCSD)
Planning Section
13105 NW Freeway, Suite 400
Houston, TX 77040
Via Email: DRplancomments@csd.hctx.net

RE: Comments on the Method of Distribution (MOD) for \$750 Million in Community Development Block Grant – Mitigation (CDBG-MIT) Funding Allocated to Harris County

Dear Disaster Recovery Planning Team:

The Community Flood Resilience Task Force (CFRTF) is pleased to provide comments on the Method of Distribution referenced above.

The CFRTF understands that, according to the U.S. Department of Housing and Urban Development (HUD), CDBG-MIT funding must be used to *increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.*

The CFRTF was created by the elected leaders of Harris County, to help Harris County prepare a *2050 Flood Resilience Plan*. The creation of the CFRTF is a tangible acknowledgment by the people of Harris County that flooding is a primary cause of disasters in our area. For this reason, the CFRTF urges HCCSD to prepare an MOD that prioritizes funding of projects that

reduce the risk of flooding which lead to the loss of life, injury, damage to and loss of property, and suffering and hardship.

The CFRTF also understands that the pending MOD must “contain a description of all criteria used to select applications from local governments for funding, including the relative importance of the criteria, where applicable.” We further understand that any local government, special district, or similar entity within Harris County can apply to use CDBG-MIT funds allocated to Harris County.

To support the reduction or elimination of flood risks in Harris County, we recommend the MOD strongly prioritize flood risk reduction projects sponsored by the Harris County Flood Control District (HCFCD). The HCFCD has the greatest capacity for flood risk reduction project planning, design, and delivery of any public agency, local government, or special district in the region. It is also supported by a dedicated revenue source and its work is leveraged by the 2018 Harris County Flood Bond.

We recommend the MOD strongly prioritize *2018 Flood Bond Projects* that were left without partner funding after the CDBG-MIT funding dollars were originally allocated to recipients other than Harris County.

We recommend the MOD strongly prioritize flood risk reduction projects in areas with the greatest pre-project risks of inundation. For example, a project that reduces flood risks for an area with an existing 5% annual chance of inundation should be preferred over one that reduces flood risks for an area with an existing 2% annual chance of inundation. This factor could be “normalized” by population or area to allow apples-to-apples comparisons.

We recommend the MOD strongly prioritize flood risk reduction projects in areas with higher Social Vulnerability Index (SVI) values. The enclosed map illustrates the value of the SVI within existing) flood hazard areas designated by the National Flood Insurance Program (NFIP). CDBG-MIT funds should prioritize projects located in areas with SVI’s above 0.75. In order to account for the SVI and other social factors, we recommend that the MOD incorporate the same criteria and scoring rubric included in the *2022 Prioritization Framework for the Allocation of Funds from the Harris County Flood Resilience Trust* adopted by Harris County Commissioners Court on April 26, 2022.

We recommend the MOD strongly prioritize flood risk reduction projects that reduce flood risks for the most people – rather than structures.

The CFRTF recommends the MOD allocate 1% of the available funding towards flood risk reduction planning and resilience planning. The CFRTF understands that the effort to prepare the *2050 Flood Resilience Plan* is currently unfunded. The CFRTF urges the Harris County Community Services Department to prepare a MOD that would allow the Harris County Flood

Control District to apply for planning funding to fully fund all work needed to prepare the 2050 Flood Resilience Plan and that this type of application would be favorably ranked under the MOD scoring criteria. HCFCF will need funding for a flood planning consultant to assist the Infrastructure Resilience Team (IRT) with planning work, geographic information system (GIS) analysis, and document preparation; a stakeholder engagement firm to assist with policy and resident stakeholder engagement, and funding to compensate community-based organizations representing high-social vulnerability communities and/or community members that aren't able to participate due to their economic status, in order to fully participate in the planning process.

We appreciate the opportunity to comment on the preparation of this important MOD.

Sincerely,

Harris County Community Flood Resilience Task Force

Executive Committee, on behalf of the Overall Approach and Finance + Regulatory Committees



Kenneth Williams
Chair



Elaine Moralez
Vice Chair



Yasmeen Dávila
Secretary

Enclosure