

**Congress of the United States**  
Washington, DC 20515

July 28, 2022

Houston-Galveston Area Council  
Attn: Cheryl Mergo  
P.O. Box 22777  
Houston, TX 77227-2777

Re: Houston-Galveston Area Council Community Development Block Grant-Mitigation Method of Distribution

Dear Members of the Houston-Galveston Area Council Board:

We welcome the opportunity to submit comments on the Houston-Galveston Area Council (H-GAC) Community Development Block Grant-Mitigation (CDBG-MIT) Method of Distribution (MOD). The funds in this MOD, which were appropriated by Congress, will reduce the risk of future flooding in the regions most impacted by significant rain events in 2015, 2016, and 2017, including Hurricane Harvey. It is an important step in addressing our disaster mitigation needs, and we thank you for your commitment to supporting Texas communities in our region.

As you know, Hurricane Harvey devastated the Gulf Coast region in 2017, its nearly 60 inches of rain and related flooding claiming 68 lives and causing an estimated \$125 billion in damage. This destructive storm was the third in three years, following significant rain events in 2015 and 2016 in Houston and Harris County, the Memorial Day and Tax Day floods. Harris County, the most populous county in Texas, is the only county in Texas that the U.S. Department of Housing and Urban Development (HUD) identified as “most impacted and distressed” from the Memorial Day flood in 2015, the Tax Day flood in 2016, and Hurricane Harvey in 2017.

The U.S. Congress passed the *Bipartisan Budget Act of 2018* (BBA) shortly after Hurricane Harvey and appropriated \$12 billion in CDBG-MIT funding for hazard mitigation activities in response to qualifying disasters in 2015, 2016, and 2017, including Hurricane Harvey. Congress intended these funds to be used to mitigate future risk in the areas most impacted by these disasters. The BBA is clear that areas that received the most CDBG Disaster Recovery (CDBG-DR) funds should receive the most CDBG-MIT funds to mitigate damages and lessen the need for CDBG-DR funding in the future.

After seeing the results of the H-GAC board’s vote in February, we are concerned that the decision to allocate only \$9.2 million to the City of Houston will fail the communities most impacted by Harvey and prior storms and leave those communities even more vulnerable to future disasters. This proposed allocation denies the intent of the Congress that appropriated the funds and leaves the City of Houston, which makes up 30% of the region’s population and almost 50% of the damages from Hurricane Harvey, with approximately 2% of H-GAC’s available funds. We are further concerned by the board’s discussions to deny H-GAC funding to any cities within Harris County if the Texas General Land Office’s (GLO) Action Plan Amendment 1, which awards \$750 million to Harris County, is approved.

As you know, Action Plan Amendment 1 proposes an allocation of \$750 million in CDBG-MIT funds for Harris County to distribute to flood and drainage districts and municipalities within their jurisdiction, including the City of Houston. Because Harris County and Houston were not awarded any funds in GLO's \$2.3 billion funding competition, this proposed allocation will be the sole direct funding source for our local governments to complete mitigation projects in Houston and Harris County.

This proposed subgrant of less than \$750 million is not sufficient for the communities in Houston and the damage they faced during Hurricane Harvey and the floods in 2015 and 2016. Furthermore, because this plan has not yet been approved by HUD, there is no guarantee these funds will ever get to Harris County or the City of Houston. Without approval of this plan and a method of distribution with which Harris County will allocate those funds, it is not a responsible approach for H-GAC to consider reducing the current allocation to zero.

On behalf of our constituents, and having consulted local leaders and experts, we ask H-GAC to award funds to the City of Houston based on Congressional intent, focusing on the regions most impacted by the flooding in 2015, 2016, and 2017. There is no reason the City of Houston should receive only 2% of available funds after suffering nearly 50% of damages.

We urge H-GAC to take these considerations into account as the MOD is being developed. We also ask that H-GAC work with local leaders to make data-driven changes to this MOD so that it more accurately reflects the disproportionate damage Houston has faced in recent years. We look forward to working with you to ensure that Houston receives a fair and appropriate allocation of these funds.

Sincerely,



Lizzie Fletcher  
Member of Congress



Sylvia Garcia  
Member of Congress



Al Green  
Member of Congress