

**AACOG CDBG-MIT MOD  
PUBLIC COMMENTS AND QUESTIONS**

**QUESTION(S):**

1. Kathy Wood, City of Seguin – What path of recourse do entities have regarding the allocation amounts? What happens to allocations not spent by entities within the region?

**Response:** Communities with projects in mind and anticipating the need for additional Mitigation (MIT) Method of Distribution (MOD) funding are encouraged to contact their County Commissioners Court to inform them of the project, and potentially enter into an Interlocal Agreement (ILA) between the city and county to aide with their project. Any unspent funds will be reallocated to other State of Texas programs and will not be scheduled for a reallocation under this program.

Additionally, the MOD is currently out for public comment and stakeholders are encouraged to provide comments online, via email to [cmora@aacog.com](mailto:cmora@aacog.com) or at the public hearing on July 17 at 5 p.m. The public comment period will be open through July 20, 2023 at 5:00PM.

**PUBLIC HEARING COMMENTS:**

1. Kathy Wood, City of Seguin – Ms. Wood opposes Method of Distribution (MOD) for the eligible cities. Ms. Wood believes the MOD should be based on population. She mentioned Seguin community representatives attended the first public hearing and voiced their concerns over the methodology used, which divides the total funds equally among the seven (7) eligible cities. Ms. Wood expressed concern for some smaller, eligible entities who may not have the resources to administer the funds and end up having to return the funds to the TxGLO, and thus, have the funds leave the region and not be available to communities like Seguin. Ms. Wood also stated she felt that the methodology used to distribute funds among the nine (9) counties – using the factors of Low-to-Moderate Income (LMI), Societal Vulnerability Index (SoVI), and Population – was fair and equitable for the allocation of funds. (*Verbal Comment*)
  - a. **Response:** AACOG believes a formula-based calculation of funding for eligible counties is necessary to ensure counties have an appropriate amount of dollars available to meet the needs of the cities and overall population within their respective county. AACOG also believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. Providing historically underserved communities the access to increased public funding, specifically for the purposes of building infrastructure to alleviate the adverse effects on people and property during natural disasters, can be transformational for these communities and their residents. Letters were sent out to all the communities’

mayors and city councils to inquire about their need and use of the preliminary-approved allocation amounts. All seven cities approved and signed the commitment to use the funds if funding was indeed allocated to them.

2. Donna Dodgen, Mayor, City of Seguin – Mayor Dodgen stated the City of Seguin City Council passed a resolution opposing the MOD that allocated funds evenly to the seven (7) eligible cities, to formally express their opposition to the proposed MOD allocations. Mayor Dodgen stated that the methodology used to determine the allocations for the counties was equitable and should have been used for the cities. (*Verbal Comment*)
  - a. **Response:** AACOG sincerely appreciates the engagement and involvement from the City of Seguin on this program and process. The factors, separation, and distribution of amounts allocated to eligible cities and counties was performed strategically, and after much consideration. If cities have a project in mind for their allocations and anticipate needing supplementary dollars to complete it, AACOG strongly encourages cities contact their County Commissioners Court to inform them of the project and request to enter into an Interlocal Agreement (ILA) between the city and county to aide with the project(s).
  
3. Steve Parker, City Manager, City of Seguin – Mr. Parker stated the fairest method of distribution would be to allocate the available funds based on the percentage of population. (*Written Comment*)
  - a. **Response:** AACOG believes cities within the eligible counties, which vary in population, are traditionally appropriated public dollars using ‘population’ as the leading factor in allocation amounts. AACOG does agree that population is a considerable factor, which is why ‘Population’ was used on the county allocations. By doing this, eligible cities - regardless of population – have the opportunity to take on significant projects that can truly alleviate the adverse effects on people and property during natural disasters; and cities and counties with higher populations can come together through an Interlocal Agreement (ILA) to supplement funds for any one project beneficial to the residents of said city.

No questions were asked during the Public Hearing.