

Outreach – Comment Period

The City of San Marcos held a public comment period on the draft CDBG Mitigation Action Plan (“the draft Plan”) from January 13, 2020, through February 27, 2020. The draft Plan was posted on the City’s website for this time period in English and Spanish. A public notice published in English and Spanish in the local newspaper, the San Marcos Daily Record, on January 5, 2020, informed the public where the paper and electronic versions of the document could be found during the comment period, as well as the purpose of the document.

During the comment period, the City also held a public meeting on February 12, 2020, to present information and receive comment on the draft Plan. A translator was present at the meeting. Comments were received in writing on comment cards.

Eight comments were received on comment cards and three comments were received by email.

The draft Plan includes proposed allocations of funding to programs for the following: repetitive loss infrastructure, land preservation, hazard warning system, signs and barricades, planning, and administration.

SUMMARY OF COMMENTS RECEIVED

Three of the comments were in support of the allocations, particularly repetitive loss infrastructure and land preservation. One comment requested information a project underway as part of disaster recovery efforts.

The other comments provided suggestions for the following specific projects to be funded within the program categories. These suggestions will be considered by staff when making final selections for projects to be funded with CDBG-MIT funds within the programs that have been allocated funding. Staff will consider HUD eligibility, public impact compared to cost, and the need for funding competing priorities when reviewing project suggestions.

Project Suggestions:

Suggestion	Source
<ul style="list-style-type: none">• Create a reimbursement program for bioremediation of soil surrounding single family homes	Citizen
<ul style="list-style-type: none">• Install backflow valves to prevent sewage back up into homes during floods	Citizen
<ul style="list-style-type: none">• Drainage improvements onsite at C.M. Allen Homes <i>(one comment received against this proposal)</i>	Public Housing Authority
<ul style="list-style-type: none">• Make funds available for updated code adoption (planning)• Broaden the city’s inclusion of funding for building code enforcement to include not only flood hazards but wind hazards as well (repetitive loss infrastructure)• Provide funding for post-disaster damage assessment training	International Code Council

- | | |
|--|--|
| <ul style="list-style-type: none">• Require FEMA's minimum standards and appropriate training for plan reviewers and building code enforcers for mitigation projects | |
|--|--|

Mitigation - Draft Action Plan Comments Received 1/13/20-2/27/20

As for as the CM Allen homes are concerned and the San Marcos. The Housing Authority they have their own federal funding funds. They get millions and millions since the 2015 flood. Why are they requesting more funds from the CDBG – Mitigation Action Plan. Improvements from the San Marcos Housing Authority uses the funds to benefit their own agendas.

The housing authorities submitted a request for funding for drainage at CM Allen. Can funds be expected to be provided? Mitigation reimbursements are established by HUD are met. Repetitive loss, LMI Priority, Drainage project will lessen the risk of future flooding of building and persons.
Document Attached

This is great start, but it has to be done to really understand the ramifications. If we can see how this works it will make it better.

Why is the City leveling out trenches within the city instead of leaving the trenches as they are.
(Barrio Pescado, Purgatory)

I would like to suggest that backflow valves (check valves) be installed with mitigation funds. These devices are required by building codes in low lying European Countries. Several neighbors in Blanco Gardens had damage (especially in Oct. 2015) where sewage backed up and exploded with lots of pressure behind it causing sewage damage in their bathrooms. (Sewage even exploded up to their bathroom ceiling.) The devices would prevent sewage damage in homes. I know for a fact that some BG homes that didn't have flood damage experienced sewage damage. The check valves can be installed for less than \$1000 apiece. Citizens could even install these themselves and a rebate program could be used to refund citizens. This way if a flood threatens the neighborhood we could activate the check valves and save our homes from sewage damage.

I'm the bioremediation mom 😊, happy to volunteer to get the word out and in any other way I can to help the project work out. Really wanting to give the power to homeowners to soak up rain. Slow it down, & reduce runoff – healthier soils can reduce floods by 1/15th! Will bring names, contact info, & signatures from the other mom's March 3rd, strength in numbers 😊

We support the current CDBG mitigation action plan and support the “addressing repetitive loss “budget category to be used for the Riverine construction project for Blanco Gardens.

I agree, good ideas, all. The top 2 can be well spent & quickly (& should be!) since we need to buy up spots that can help soak in floodwaters, before that spot is building on or paved. The purchase of land on Purgatory Creek in town is also a good idea as part of the flood mitigation project there.

Document attached: Letter from Public Housing Authority

Document Attached: Letter from ICC

Document Attached: Bioremediation Program Proposal

Soil into Sponges Project Proposal-- San Marcos

“Building healthier soils could **reduce runoff in flood years by nearly one-fifth, cut flood frequency by the same amount**, and make as much as 16 percent more water available to groundcover to use during dry periods.” (From *Turning Soil into Sponges*. Union of Concerned Scientists Report, 2017.)

What the report found:

“Incorporating more than 150 field-scale experiments from six different continents, the analysis evaluated the impact of specific practices on soil properties such as the rate at which water moves into and through soil (infiltration rate), the spaces between soil particles (pore space or “porosity”), and the amount of water made available to plants. The authors identify “continuous living cover,” which can be achieved through incorporating deep-rooted perennials to consistently and effectively improve soil health. Specifically:

- Keeping soil covered with living plants increased its ability to absorb water in 70 percent of the field studies analyzed.
- Water infiltration rates improved by 59 percent with perennial grasses.

This is a plea to City Council to please set aside a portion of the CDBG-Disaster funding within the "Land Preservation" category for a Soil into Sponges (SIS) Project. San Marcos Utilities already has a funded program where homeowners get a \$75 max annual rebate when they submit receipts for mulch or compost to improve their soil conditions, the goal being to reduce city water usage/ bills because their lawns won't use as much water to stay healthy. The SIS rebate project would complement this program with further funding through CDBG that can bioremediate entire properties, instead of a small patch. SIS will also complement the Department of Agriculture's existent funding to help SM homeowners cover the cost of native TX grasses to keep yearlong drought-resistant groundcover.

SIS would allow the City to expand their current Low Impact Development program by providing the power to residents to soak up rain, slow it down and reduce runoff to our storm sewer system on a home-by-home basis. This will not only help San Marcos to be more resilient to larger more frequent storm events, but also boost the City's Sustainability program and add to the City's Nature-Based Infrastructure Score as evaluated annually by Environment Texas. San Marcos currently ranks with Austin, San Antonio and Houston as being the top 4 cities out of 10 in Texas evaluated for having robust Nature-Based Infrastructures, based on the recent 2020 Report published.

Further benefits of SIS, above and beyond flood prevention, would include 1) **effective lead poisoning prevention actions* when over 90%** of San Marcos children are testing positive for lead exposure**, 2) improved lung protection and health because harmful dust from dead lawns is much less bioavailable during drought/heavy winds 3) water conservation and 4) community enhancement and neighborhood beautification through properties that have healthier, more vibrant lawns.

*Exposure to leaded soil is one of the most common yet overlooked sources of lead exposure in children, especially in historic cities like San Marcos and San Antonio. The EPA and Texas Commission on Environmental Control (TCEQ) recommend bringing in new soil to layer on top of the contaminated soil and plant grass that will provide year-long groundcover as an effective abatement measure. The time to act is NOW! **Data collected from the Blood Lead Surveillance Branch, of the Texas Department of State Health Services

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Griffith, Carol

From: Kristy Money <kristy.money@gmail.com>
Sent: Monday, February 10, 2020 4:15 PM
To: Griffith, Carol
Subject: Re: [EXTERNAL] Re: Disaster Recovery Amendment 9 and the MIT Action Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you so much! Please see wording at end of this paragraph on details on how the program might possibly work, I would love to know what you think and would welcome any and all feedback/edits of course, don't hold back! I can turn any edits around within 24 hours, no problem. I have at least 1-2 other mamas who will come with me Feb 12th, thank you for the guidance! More letters of support to come from those that can't make it. Do you think it would be helpful to receive a letter from Elizabeth Arceneaux, an environmental engineer who works for the city? She and I have been talking about bioremediation and new soil to cover the old damaged stuff in our town for about a year in a half now, and she knows her stuff! I have also brought my concerns up in person to both Mark Rocky-Moore and Joca and they were very receptive.

This is a plea to City Council to please set aside a portion of the CDBG-Disaster funding within the "Land Preservation" category to be used toward bioremediation of San Marcos homeowner's properties to prevent future flooding. Bringing in new soil/compost mixes, mulching, and planting native grasses/plants will revive old and contaminated soils helping more excess rainwater to return to the ground rather than running right over the properties and into the city's stormwater systems. Lead in the soil is of particular concern in combination with flooding because, as researchers showed after Hurricane Katrina, lead levels increased by spreading around leaded soils by the floodwaters. 90% of tested San Marcos children (and only 10% of San Marcos children are even tested) were positive for lead exposure, and lead exposure causes irreversible damage to a child's developing brain including lowered IQ, ADHD, behavioral problems, and learning disabilities. Bioremediation has the dual benefit of not only preventing floods in our city, but also lowering lead levels of our children, who cannot advocate for ourselves. We must do it for them.

The particulars of a bioremediation program for homeowners could include \$25,000 set aside for rebates. Homeowners who qualify as low-income (based on what the city uses for CDBG-normal funds), and/or in neighborhoods considered as "blights," can submit receipts to the community development office, which can include costs for supplies like new soil/compost mixes, mulch, and native plants. A volunteer (I am happy to do this) can help homeowners by layering funding sources, helping them also apply for the Department of Agriculture's native grasses program in which the DOA will help them buy native grass seeds at no cost to them. This volunteer will also educate the community through social media, events at the library, and through the San Marcos Cinema Club, on the benefits of bioremediation and the city's offer to help them clean up their soils so that more rainwater can enter the environment and not flood our streets as much as before. Furthermore, bioremediation will have the added benefit of reducing harmful air quality during times of drought, as bare dirt/dead parched lawns kick up a lot of dust and is harmful to residents' lungs, not only of the property owners but of the entire city as the contaminated soil is spread easily by the wind. I am also happy to volunteer my time helping homeowners fill out applications for the rebate program, which can be as simple as filling out an initial application with photos, getting the green light based on income and availability of funds, and then submitting receipts once they complete bioremediation. Target number of properties that undergo bioremediation for the first year of the program are 10-15 homes, with an average of \$2,000 per property spent. I am also happy to put together a 1-page infographic for homeowners on the benefits of bioremediation and particulars of the program that can be handed out all around the city and at meetings, and spread on social media.

On Thu, Feb 6, 2020 at 9:12 AM Griffith, Carol <CGriffith@sanmarcostx.gov> wrote:



February 24, 2020

City of San Marcos
City Hall, 630 East Hopkins Street, San Marcos, Texas 78666
San Marcos, TX 78666

Via email: mitigation@sanmarcostx.gov

To Whom it May Concern,

I am writing on behalf of the International Code Council (the “Code Council”) to provide comments on the City of San Marcos’ CDBG Mitigation Action Plan (CBDG-MIT Plan).

The Code Council is a member-focused non-profit association dedicated to building safety and sustainability and we are proud to count San Marcos among our Governmental Members. The Code Council develops the model building codes, the I-Codes, used in the design, build and compliance process to construct safe, sustainable, affordable and resilient structures. The I-Codes, including the International Residential Code (IRC), the International Building Code (IBC) and International Energy Conservation Code (IECC) are the most widely used and adopted set of building codes in the U.S. and around the world. Developed through a consensus-based process, the I-Codes incorporate the latest technology and provide the safest, most resilient structures for our families and communities.

We commend the City for the Plan’s attention to flood and other hazard mitigation; however, the Plan is silent about the importance of adopting and broadly applying modern, resilient, building codes as the first and most impactful step towards mitigation. For this reason, our comments focus on the importance of incorporating code adoption and enforcement into San Marcos’ CDBG-MIT Plan implementation. San Marcos should take steps to advance long-term resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property by adopting and applying the most recent editions of the national model codes that address existing natural hazards.

STUDIES SHOW BENEFITS OF MODERN BUILDING CODES AGAINST DISASTERS

Numerous studies confirm that the adoption and implementation of current model building codes is one of the nation’s best defenses against the natural hazards San Marcos’ CDBG-MIT Plan identifies as presenting the greatest risks to the City, including hurricanes, tornadoes, and flooding. For example:

- The 2019 FEMA Mitigation Assessment Team (MAT) report following Hurricane Harvey found that National Flood Insurance Program (NFIP) regulations reduced average claim payments by almost half and following modern code requirements reduced the average claim payments by an additional 90%.¹ In addition, the National Institute for Building Sciences’ Natural Hazard Mitigation Saves report found that adhering to current codes’ flood mitigation requirements in the floodplain saves \$6 for every \$1 invested.²

¹ FEMA P-2022, *Mitigation Assessment Team Report: Hurricane Harvey in Texas, Building Performance Observations, Recommendations, and Technical Guidance*, February 2019, See https://www.fema.gov/media-library/assets/documents/177700?utm_source=gd&utm_medium=ces&utm_campaign=HarveyMAT

² National Institute for Building Sciences, *Natural Hazard Mitigation Saves: 2018 Interim Report*

- The Mitigation Saves 2018 Interim Report also found that designs meeting the 2018 IRC and IBC result in a national benefit of \$11 for every \$1 invested.³
- Although building code adoption alone generates enormous mitigation benefits, code enforcement is equally important. FEMA quantified the cost of Dade County’s inadequate code enforcement as a quarter of the \$16 billion in insured losses from Hurricane Andrew.⁴ Researchers found similar results about 15 years later: that implementing building codes at the local level by ensuring proper staffing, training, and certification provides an additional loss reduction value on the order of 15 to 25 percent.⁵

Several Texas-specific studies reached similar conclusions. The Governor’s Commission to Rebuild Texas, “Eye of the Storm” report established that resilient building codes for all new structures are needed on the Texas coast as outdated building codes and local ordinances contribute to wind and flood damage. The report recommended to the Texas Legislature that “Updating and improving these regulations would make Texas more resilient.”⁶ And the Texas General Land Office (GLO) Hurricane Harvey: Texas at Risk, report states, “The evidence from numerous studies and interviews with local officials proves irrefutably that properly written and rigorously enforced disaster-focused building codes significantly reduce wind and flooding damage caused by hurricanes.”⁷

Recognizing the life safety and mitigation benefits that current building codes provide for communities, the U.S. Department of Housing and Urban Development’ (HUD) has both required applicants for disaster recovery funding commit to adopt resilient codes and made available significant sums for codes’ adoption and implementation. For the past seven years, and across multiple allocations, HUD has required Community Development Block Grants for Disaster Recovery (CDBG-DR) applicants demonstrate in their action plans how they will support the adoption of resilient building codes.⁸

HUD’s CDBG-MIT funding notice states that “through this allocation for mitigation,” HUD seeks to “support the adoption” of the “latest edition of the published disaster-resistant building codes and standards (to include wildland urban interface, flood and all hazards, ASCE-24, and ASCE-7 respectively).” As such, “[g]rantees are encouraged to propose an allocation of CDBG-MIT funds for building code development and implementation, land use planning and/or hazard mitigation planning activities that may include but need not be limited to: (a) The development and implementation of modern and resilient building codes consistent with an identified model or

³ National Institute for Building Sciences, Natural Hazard Mitigation Saves: 2018 Interim Report

⁴ Burby, R., *Hurricane Katrina and the paradoxes of government disaster policy: Bringing about wise governmental decisions for hazardous areas* (2006) citing *FEMA Building Performance Assessment Team, Preliminary Report in Response to Hurricane Andrew, Dade County, Florida* (1992).

⁵ Czajkowski, J. et. al., *Demonstrating the Intensive Benefit to the Local Implementation of a Statewide Building Code* (2017).

⁶ Eye of the Storm, Report of the Governor’s Commission to Rebuild Texas, Chapter 7 – Building a More Resilient Texas, Pages 115-116, https://gov.texas.gov/uploads/files/press/RebuildTexasHurricaneHarveyEyeOfTheStorm_12132018.pdf

⁷ Andrew Natsios, “Hurricane Harvey: Texas at Risk,” Texas General Land Office, George P. Bush, Commissioner, August 2018, Pages 25-29; See <http://www.glo.texas.gov/recovery/files/texas-at-risk-report.pdf>.

⁸ HUD, Allocations, Common Application, Waivers, and Alternative Requirements for 2017 Disaster Community Development Block Grant Disaster Recovery Grantees, 83 Fed. Reg. 5844, (Feb. 9, 2018); Notice of National Disaster Resilience Competition Grant Requirements, 81 Fed. Reg. 36,557 (June 7, 2016); Allocations, Common Application, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy, 78 Fed. Reg. 14,329 (Mar. 5, 2013).

standard, such as ASCE 24 and ASCE 7 as may be applicable, in order to mitigate against current and future hazards.”⁹

FEMA has similarly prioritized code adoption and enforcement, concluding in its most recent five-year strategic plan that current building code adoption and enforcement are two of the most effective mitigation measures a jurisdiction can undertake by stating: “[d]isaster resilience starts with building codes, because they enhance public safety and property protection.”¹⁰ In the Plan’s very first objective, FEMA highlighted the importance of the Agency’s “advocate[ing] for the adoption and enforcement of modern building and property codes.”¹¹

In August of 2019, the Mitigation Framework Leadership Group (MitFLG)—chaired by FEMA and made up of another 13 federal agencies and departments as well as state, tribal, and local officials— released the National Mitigation Investment Strategy (NMIS). The Strategy makes several recommendations concerning the use, enforcement, and adoption of building codes: “[a]rchitects, engineers, builders, and regulators should use the latest building codes for the most up-to-date requirements for structural integrity, mechanical integrity, fire prevention, and energy conservation,” “trained, certified professionals [should] handle building inspections and code administration,” and “[u]p-to-date building codes and standard criteria should be required in federal and state grants and programs.”¹²

Lastly, FEMA’s “Required Minimum Standards” for all FEMA funded construction require the latest I-Codes.¹³ For post-disaster recovery, FEMA requires construction meet the latest editions of the IBC, IRC, IECC, International Existing Building Code (IEBC), International Wildland-Urban Interface Code (IWUIC), International Plumbing Code (IPC), International Mechanical Code (IMC), International Fuel Gas Code (IFGC), International Fire Code (IFC), ICC 500-14, ICC/NSSA Standard on the Design and Construction of Storm Shelters; ICC 600-14, and the Standard for Residential Construction in High-wind Regions.¹⁴ The Agency has deemed adherence to the current versions of these codes to be so important that it will not fund rebuilding of public facilities post-disaster if that construction deviates.

THE BENEFITS OF CODE ADOPTION FOR SAN MARCOS

Unfortunate events like the May and October 2015 floods¹⁵ have shown the need for San Marcos to become better prepared to take mitigating steps to build stronger for the future. As demonstrated above, adopting current codes is one of the most effective means to do so.

San Marcos has adopted the 2015 editions of the IBC, IRC, IPC, IMC, IFGC, IFC, IEBC, the International Property Maintenance Code (IPMC) and the 2009 edition of the IECC.¹⁶ The 2018 editions of these codes include numerous provisions that mitigate the hazards San Marcos has identified as presenting the greatest risk to the

⁹ HUD, Allocations, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Mitigation Grantees, 84 Fed. Reg. 45,838 (Aug. 30, 2019).

¹⁰ FEMA’s 2018-2022 Strategic Plan (2018)

¹¹ *Id.*

¹² Mitigation Framework Leadership Group, *National Mitigation Investment Strategy* (Aug. 2019).

¹³ FEMA Policy 204-078-2.

¹⁴ FEMA Recovery Interim Policy FP- 104-009-11 Version 2.

¹⁵ See http://sanmarcostx.gov/DocumentCenter/View/16506/CDBGMIT_COSMAActionPlan_20200109---Final

¹⁶ See <https://www.sanmarcostx.gov/1012/Building-Codes>; See also https://library.municode.com/tx/san_marcos/codes/code_of_ordinances?nodeId=SPAGEOR_CH14BUBURE; See also <file:///C:/Users/ksadler/Downloads/Ordinance%20No.%202015-21.pdf>

City. For this reason, we'd strongly encourage San Marcos to consider facilitating their adoption through its CDBG-MIT allocation.

For example, updating to the 2018 IRC will require strengthened header support for high wind regions and improved flood safety provisions for stairways, ramps, and decks.

Updating to the 2018 IBC will also require structural observation for high rise and critical buildings to ensure that complex, critical design elements are reviewed and done to exact specifications.

Updating to the 2018 IFC will require retroactive installation of automatic fire sprinkler systems for high rise buildings; provisions to ensure fire service and occupant evacuation elevators are able to continue to function and serve their intended purposes in an emergency; evacuation plans for factory/industrial buildings and additional crowd managers for larger events; and provision to ensure water from automatic sprinklers is prevented from entering into fire service and occupant elevators.

Finally, updating to the 2018 IECC will boost building energy efficiency, ensuring that buildings can be conditioned using less energy, which means that they can also be habitable for longer periods of time after loss of power in both hot and cold exterior conditions.¹⁷

SAN MARCOS CDBG-MIT PLAN RECOMMENDATIONS

The following recommendations urge the City to recognize as eligible for funding within the CDBG-MIT Action Plan, the adoption of building codes that update San Marcos' existing codes and improved code enforcement. These recommendations also encourage San Marcos to require FEMA's Minimum Standards as construction standards for mitigation projects and to require appropriate training and certifications for officials supporting those projects. Finally, our recommendations suggest funding for post-disaster damage assessment training.

The City's Plan Should Make Funds Available for Updated Code Adoption

The CBDG-MIT Plan sites "building codes improvements" as part of San Marcos' "past" mitigation action prior to 2017.¹⁸

In addition, the CBDG-MIT plan includes an "incomplete" goal for the "adoption of building structural engineering reviews." This goal is described as an "Ordinance update to require any public facility building plan be structurally reviewed and enforce highest possible building code levels that increase resiliency against natural hazard."¹⁹ Although the report states that "This enhancement to existing permitting and review processes is an action that would save the community from potential losses related to hazards that affect critical facilities and infrastructure that all citizens depend upon for services," this goal has not been completed by the City as of 2017.

¹⁷ Leigh, R., J. Kleinberg, C. Scheib, R. Unger, N. Kienzl, M. Esposito, E. Hagen, and M. Tillou. *Leaks and Lives: Better Envelopes Make Blackouts Less Dangerous*. ACEEE Summer Study on Energy Efficiency in Buildings. 2014; See <https://aceee.org/files/proceedings/2014/data/papers/1-439.pdf>.

¹⁸ See Section 4.2 Past Mitigation Action Progress Reports Summary - Completed and Canceled, Page 39,

http://sanmarcostx.gov/DocumentCenter/View/16506/CDBGMIT_COSMAActionPlan_20200109---Final

¹⁹ See Page 39, http://sanmarcostx.gov/DocumentCenter/View/16506/CDBGMIT_COSMAActionPlan_20200109---Final

The Code Council supports the City's ongoing work to consider updating its codes. However, we respectfully believe the City should commit, through its Plan, to updating its building codes, and leave itself the option of leveraging CDBG-MIT funding to do so through a designated percentage in its "Planning" Funds allocation.

The City Plan Should Specify the Availability of Funds for Improved Code Enforcement

Building code application is most commonly measured through a community's Building Code Effectiveness Grading Schedule (BCEGS) score, an evaluation conducted by ISO, an analytics provider for the property/casualty insurance industry. BCEGS scores evaluate communities on staffing to permitting load, training, continuing education, and certification. Better BCEGS scores (i.e., lower scores out of 10) typically translate into lower insurance premiums for communities.

The Code Council supports San Marcos' CDBG-MIT Plan to include code enforcement activities under its proposed allocation for "Repetitive Loss Infrastructure."²⁰ We also suggest broadening the availability of enforcement funding beyond flood hazards given improved code compliance has been proven to increase loss avoidance from wind hazards, and given, per ISO, improved enforcement can lead to insurance savings.

The City's Plan Should Provide Funding for Post-Disaster Damage Assessment Training

We recommend the City partner with the Code Council and the Building Officials Association of Texas (BOAT) to promote and alert communities about post disaster damage assessment training programs and to provide funding for these programs. After a disaster, an affected community is often left on its own to struggle with assessing its damage and determining whether structures can be re-inhabited. Local government officials may not be instructed on how to perform rapid safety evaluations or what data to collect. When assessments are not conducted quickly, a community's residents may potentially reoccupy unsafe structures. Effective post-disaster building damage assessment can minimize the possibility for additional bodily injury by advising residents and aiding providers of eminent hazards at specific locations.

To this end, we recommend the City promote participation in existing post-disaster damage assessment training programs like the "When Disaster Strikes Institute."²¹ This institute provides hands-on instruction on assessing damage through activities, case studies and interactive simulations that walk participants through various disaster scenarios. The institute stimulates discussion between participants and describes how paperwork should be completed. Participants learn techniques on how to become a properly trained second responder and, on completion, can be relied on to assist with performing post-disaster building assessments.²²

The City Should Require FEMA's Minimum Standards and Appropriate Training for Mitigation Projects

The CDBG-MIT Plan provides a large allocation to flood mitigation projects; however, as discussed above, San Marcos' adopted codes do not incorporate the latest hazard resistant design (not only for flood, but also for high

²⁰ See Page 48, file:///C:/Users/ksadler/Documents/CDBG/Texas/San%20Marcos/Page%20111%20CDBGMIT_COSMAActionPlan_20200109%20-%20Final.pdf

²¹ See https://learn.iccsafe.org/ihhtml/application/student/interface.icc/index.htm?course_id=34141; See also https://learn.iccsafe.org/ihhtml/application/student/interface.icc/index.htm?course_id=34141

²² See https://learn.iccsafe.org/ihhtml/application/student/interface.icc/index.htm?course_id=34141

wind events). For this reason, the Code Council recommends San Marcos require adherence to the codes specified in FEMA’s Minimum Standards for public assistance funding to the construction projects proposed in its Plan. Utilizing the 2018 I-Code editions, as required by FEMA’s Minimum Standards, aligns with FEMA’s position on the adoption of current codes and the Agency’s prioritization in grant allocation:

“FEMA supports the adoption and use of the latest published editions of the I-Codes as a minimum standard for hazard resistance, including flood hazards, high winds, and earthquake hazards. FEMA encourages states and communities to adopt the most recent edition of the I-Codes to ensure enforcement of the latest hazard-resistant provisions. This will increase safety and reduce financial losses for individuals, supporting more rapid recovery after disasters. For the purposes of evaluating whether a community is deemed hazard-resistant, FEMA considers the two latest published editions of the I-Codes to be adequate. Additionally, new federal law and emerging policies tie some pre- and post-disaster federal assistance to the latest editions of codes and standards.”²³

Given the importance of proper code implementation, the Code Council also recommends that, consistent with the National Mitigation Investment Strategy, the City require appropriate certification and training of plan reviewers and code enforcement officials on the CBDG-MIT construction projects. We also recommend that third party, non-public entity training resources should be utilized to facilitate the highest possible level of compliance with the relevant building codes.

SUMMARY

We believe it is crucial for the CBDG-MIT Plan to support efforts to enhance San Marcos’ building codes and their enforcement. Studies prove that the adoption and enforcement of up-to-date building codes increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property.

Sincerely,

Kelly D. Sadler

Kelly D. Sadler, J.D.
International Code Council, Government Relations Manager, TX

²³ ICC & FEMA, Reducing Flood Losses Through the International Codes (Oct. 2019).

Public Comments
CDBG-MIT Activities
02/12/2020

The City of San Marcos CDBG-MIT Action Plan as adopted by the City meets HUD requirements which represent a unique and significant opportunity to carry out strategic and high impact activities to mitigate disaster risks and reduce future losses. (P.5 of the Action Plan)

Use of Funds

P. 46 of the Action Plan states that funding is allocated for infrastructure programs to lessen the risk of flooding in buildings with the ultimate goal of removing people and property from harm's way.

LMI Priority

P. 47 – states that projects which would benefit LMI neighborhood should be considered a priority.

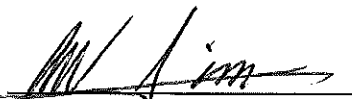
CDBG-MIT Activities

P. 48 – The Repetitive Loss Infrastructure program provides a strategy to improve the City's drainage program systems and reduce the risk of potential future flooding in neighborhoods and home.

The residents of C.M. Allen were twice flooded in ²⁰¹⁵~~2015~~. In May of 2015 – 100% of the residents were evacuated and all units were impacted and required repairs to all units. This property meets the criteria as defined by HUD and stated in the City as CDBG-MIT Action Plan.

On April 1, 2019 we requested funding to alleviate flooding of C.M. Allen Homes by the construction of drainage improvements from the CDBG-DR funds but we did not succeed.

On January 1, 2020 we again requested funds for the same reasons and today we are verbally stating the need for drainage improvements at C.M. Allen Homes.



Albert Sierra
Administrative Assistant

HOUSING AUTHORITY

OF THE CITY OF SAN MARCOS
ALLEN WOOD HOMES CENTRAL OFFICE
1201 THORPE LANE
SAN MARCOS, TEXAS 78666
(512) 353-5058 FAX: (512) 392-7458

01/01/2020

Bert Lumbreras
City Manager
630 E. Hopkins
San Marcos, TX 78666

Dear Mr. Lumbreras,

In anticipation that the City of San Marcos will prepare and submit an action plan to determine how the funds received through the Community Development Block Grant Mitigation Grant, the San Marcos Housing Authority is requesting your consideration for the use of these funds to facilitate and improve drainage at C.M. Allen Homes.

Drainage improvements within the site would greatly minimize any future flooding of C.M. Allen Homes. Families residing at this property are families who can least afford to be displaced. In the floods that occurred in 2015, 100% of the families were forced to evacuate. It is our projections that about 1770 lineal feet of a 24" pipe system would minimize any future flooding.

The construction of the drainage system along Vanessa Street is estimated to cost approximately \$600,000.

Your consideration for the construction by the City of this drainage system would offer relief from future floods.

Yours truly,



Lana Wagner
Executive Director

CC: Shannon Mattingly
Michael Ostrowski
Mayor Jane Hughson

