

TO: Board Members

THROUGH: Kevin Patteson, Executive Administrator
Edna Jackson, Deputy Executive Administrator, Operations and Administration
Les Trobman, General Counsel

FROM: Kathy Hopkins, Mitigation Specialist, Flood Mitigation Planning

DATE: February 20, 2015

SUBJECT: Reallocation of FY 2013 FMA Grant Funds between Subgrants

ACTION REQUESTED

Consider authorizing the Executive Administrator to execute contract amendments as approved and directed on February 5, 2015, by the Federal Emergency Management Agency to reallocate \$81,047.00 of Fiscal Year 2013 Flood Mitigation Assistance Grant funds from the City of Beaumont to the City of Alvin.

BACKGROUND

The Texas Water Development Board (TWDB) submitted a Flood Mitigation Assistance (FMA) grant application to Federal Emergency Management Agency (FEMA) for Fiscal Year (FY) 2013 on October 18, 2013. The TWDB was notified on January 12, 2014 of the subgrants (Cities of Alvin, Beaumont, Orange, Pinehurst, League City, and Nassau Bay; and Jefferson County Drainage District No 6) selected for award. The Executive Administrator's staff went to the Board on March 17, 2014 requesting authorization for the Executive Administrator to negotiate and execute contracts, as approved and directed by FEMA, not to exceed a total amount of \$11,093,759.92 for the subgrants from FEMA's FMA Program, within 120 days from notification of award (Attachment A). The Board approved this item.

On May 28, 2014, FEMA awarded \$965,626.00 through the TWDB to the City of Beaumont's subgrant for the acquisition and demolition of the Monterrey Apartment complex, and the conversion of the land to open space. The TWDB's Contract No. 1300011734 with the City of Beaumont was fully executed on September 24, 2014.

Reallocation of FY 2013 FMA Grant Funds between Subgrants

February 20, 2015

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On August 14, 2014, FEMA awarded \$226,671.00 through the TWDB to the City of Alvin's subgrant for the acquisition and demolition of the structures, and the conversion of the land to open space. The TWDB's Contract No. 1300011762 with the City of Alvin was fully executed on November 14, 2014.

KEY ISSUES

The TWDB received requests from the City of Beaumont and the City of Alvin seeking to reallocate underruns from the City of Beaumont's subgrant to the City of Alvin subgrant to meet their overruns. On January 27, 2015, TWDB submitted a reallocation request to FEMA for approval. FEMA approval for this request was received on February 5, 2015. Supporting documentation for this request is provided in Attachment B.

Subgrant amounts after reallocation are in the below table.

Subgrant	Original Award Subgrant Amount	After Reallocation Subgrant Amount
City of Beaumont	\$956,626.00	\$875,579.00
City of Alvin	\$226,671.00	\$307,718.00

This reallocation of funds does not increase the overall award for the FY 2013 FMA grant from FEMA.

RECOMMENDATION

The Executive Administrator recommends approval of this item.

The recommendation has been reviewed by legal counsel and is in compliance with applicable statutes and Board rules.

Les Trobman, General Counsel

ATTACHMENTS

Attachment A: March 17, 2014 Board Item #8

Attachment B: Reallocation Supporting Documentation



P.O. Box 13231, 1700 N. Congress Ave.
Austin, TX 78711-3231, www.twdb.texas.gov
Phone (512) 463-7847, Fax (512) 475-2053

TO: Board Members

THROUGH: Kevin Patteson, Executive Administrator *KB*
John F. Steib, Jr., Chief Deputy Executive Administrator
Lisa Glenn, Deputy Executive Administrator, Operations and Administration *LG*
Les Trobman, General Counsel *LT*
Ryan Long, Director, Support Services and Contract Administration *RL*
Gilbert Ward, Grants Coordinator, Flood Mitigation Planning *GW*

FROM: Kathy Hopkins, Mitigation Specialist, Flood Mitigation Planning *KH*

DATE: March 3, 2014

SUBJECT: Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance Program Grants

ACTION REQUESTED

Consider authorizing the Executive Administrator to negotiate and execute contracts as approved and directed by the Federal Emergency Management Agency (FEMA) not to exceed a total amount of \$11,093,759.92 for subgrants from FEMA's Flood Mitigation Assistance (FMA) Program, within 120 days from notification of award.

BACKGROUND

The Texas Water Development Board (TWDB) is administering the FMA program for FEMA and serves as the Point of Contact (POC) for FMA in Texas on behalf of FEMA. The FMA Program was created as part of the National Flood Insurance Reform Act of 1994. The Biggert-Waters Flood Insurance Reform Act of 2012 eliminated the Repetitive Flood Claims and Severe Repetitive Loss programs and incorporated their functions into the FMA program. The overall goal of the FMA program is to provide Federal funding to political subdivisions in order to mitigate flood damages and prevent future losses associated with severe repetitive loss (SRL), repetitive loss (RL), or substantially damaged insured structures under the National Flood Insurance Program (NFIP) through long-term comprehensive mitigation planning or through mitigation projects. As the POC, the TWDB administers the FMA program in Texas and distributes FMA funds to eligible political subdivisions for mitigation planning and project implementation grants through FEMA's annual cooperative agreement with the State.

Our Mission	:	Board Members
To provide leadership, planning, financial assistance, information, and education for the conservation and responsible development of water for Texas	:	Carlos Rubinstein, Chairman Bech Bruun, Member Mary Ann Williamson, Member
	:	Kevin Patteson, Executive Administrator

FEMA may contribute up to 100 percent of the total eligible cost for mitigation of SRL structures, 90 percent of the total eligible cost for mitigation of RL structures, and 75 percent of the total eligible cost for mitigation of NFIP insured structures or planning grants.

The FMA program defines SRL and RL properties as follows:

- A SRL property is a structure that is covered under a NFIP policy and having had either:
 - a) four or more separate claims payments having been made with the amount of each such claim exceeding \$5,000, and with the cumulative amount of such claims payments exceeding \$20,000; or
 - b) two separate claims payments have been made under NFIP policy, with the cumulative amount of such claims exceeding the market value of the insured structure.
- A RL property is a structure that is covered under a NFIP policy and a) has incurred flood-related damage on 2 occasions, in which the cost of the repair, on the average, equaled or exceeded 25 percent of the market value of the structure at the time of each such flood event; and b) at the time of the second incident of flood-related damage, the contract for the flood insurance contains increased cost of compliance coverage.

Project grants are required to have a Benefit Cost Ratio (BCR) of 1.0 or higher. The BCR is determined by using FEMA's Benefit Cost Analysis (BCA) software or a FEMA approved methodology for calculating BCR.

TWDB was notified by FEMA that the Federal application period for FMA grants would open July 17, 2013 for Federal Fiscal Year (FY) 2013 with a deadline of October 18, 2013 to submit through the Federal electronic grant system.

KEY ISSUES

As provided in the Federal rules for the administration of the FMA program, Title 44 of the Code of Federal Regulations (CFR) Part 79 (44 CFR 79), and current FEMA guidance, TWDB's responsibilities as the POC include the review of applications submitted for FMA planning and project grants. Eligible applications are forwarded to FEMA for final approval and authorization to fund. Specific contracting responsibilities are to be performed by the TWDB once funding approval is received from FEMA. TWDB received 14 FMA grant applications from the following entities: City of Alvin, City of League City, City of Nassau Bay, City of Bryan, City of Beaumont, City of Orange, City of Pinehurst, Harris County Flood Control District, Jefferson County Drainage District No. 6 (3 applications), Guadalupe County, Galveston County, and Brazoria County Drainage District No. 4, for a total of \$50,185,166.62 in requested Federal funding. The BCR for these project applications were developed using either FEMA's BCA software or a FEMA approved methodology and all had a BCR of 1.0 or higher.

These applications, along with the TWDB Management Cost application, were forwarded to FEMA for review. The TWDB was notified on January 12, 2014 by FEMA that 7 out of the 14 applications were selected for further review. The following table lists those selected for further review and the funding amount requested:

Subapplications	Project Type (Number of Structures being Protected)	Total Project Cost	Federal Share	Local Share
City of Alvin	Acquisition/Demolition (2)	\$226,671.00	\$226,671.00	\$0.00
City of Beaumont	Acquisition/Demolition (Apartment Complex)	\$965,626.00	\$965,626.00	\$0.00
City of Orange	Acquisition/Demolition (1)	\$227,000.00	\$227,000.00	\$0.00
City of Pinchurst	Acquisition/Demolition (1)	\$179,465.00	\$161,518.50	\$17,946.50
City of League City	Elevation (16)	\$2,830,297.00	\$2,830,297.00	\$0.00
City of Nassau Bay	Elevation (36)	\$6,514,128.00	\$5,677,002.42	\$837,125.58
Jefferson County Drainage District #6- Cherokee	Drainage (64)	\$1,340,860.00	\$1,005,645.00	\$335,215.00
Total		\$12,284,047.00	\$11,093,759.92	\$1,190,287.08

A brief summary of the selected applications are attached in Attachment A. FEMA has issued a memorandum designating the period of performance for these grants as January 9, 2014 through January 9, 2017, Attachment B.

RECOMMENDATION

The Executive Administrator recommends approval of this item.

The recommendation has been reviewed by legal counsel and is in compliance with applicable statutes and Board rules.

Les Trobman, General Counsel

ATTACHMENTS

- Attachment A:** Summary of Selected FMA Applications
- Attachment B:** FEMA's Period of Performance Memorandum

ATTACHMENT A

City of Alvin – Buyout Project
Federal Emergency Management Agency- Flood Mitigation Assistance

Proposed Project Funding:

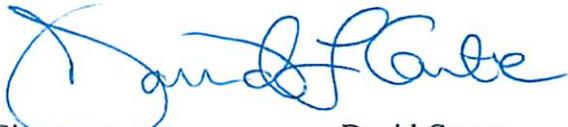
Federal Share:	\$226,671.00
Local Share:	\$ 0.00
Total Project Cost:	\$226,671.00

Participants: City of Alvin

Project Description: The City of Alvin seeks to mitigate two (2) Severe Repetitive Loss structures by acquisition and demolition, and the conversion of the land to open space. The structures are single family residential structures and the owners have voluntarily committed to the acquisition and demolition by the City. These structures have had nine (9) claims and experienced over \$196,822.67 in paid claims. Total project cost is an estimated \$226,671.00 and the City is requesting 100 percent Federal funding with no local cost share requirement. The project has a positive BCR of 2.44.

Period of Performance:

3 years

Item Summary	March 4, 2014
The application and documentation submitted by the applicant for consideration of this financial assistance has been reviewed by Contract Administration and meets funding requirements.	 Signature David Carter
The Texas Water Development Board is authorized to provide funding for this application which meets legal requirements of the subject financial assistance program.	 Signature General Counsel

City of Orange – Buyout Project
 Federal Emergency Management Agency- Flood Mitigation Assistance

Proposed Project Funding:

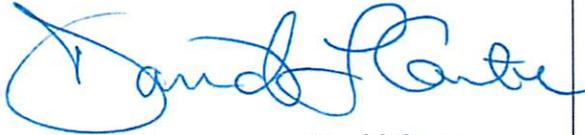
Federal Share:	\$227,000.00
Local Share:	<u>\$ 0.00</u>
Total Project Cost:	\$227,000.00

Participants: City of Orange

Project Description: The City of Orange seeks to mitigate one (1) Severe Repetitive Loss structure by acquisition and demolition, and the conversion of the land to open space. The structure is a single family residential structure and the owner has voluntarily committed to the acquisition and demolition by the City. The structure has had four (4) claims and experienced over \$271,334.37 in paid claims. Total project cost is an estimated \$227,000.00 and the City is requesting 100 percent Federal funding with no local cost share requirement. The project has a positive BCR of 1.22.

Period of Performance:

3 years

Item Summary	March 4, 2014
The application and documentation submitted by the applicant for consideration of this financial assistance has been reviewed by Contract Administration and meets funding requirements.	 Signature David Carter
The Texas Water Development Board is authorized to provide funding for this application which meets legal requirements of the subject financial assistance program.	 Signature General Counsel

City of League City – Elevation Project
 Federal Emergency Management Agency- Flood Mitigation Assistance

Proposed Project Funding:

Federal Share:	\$ 2,830,297.00
Local Share:	<u> 0.00</u>
Total Project Cost:	\$ 2,830,297.00

Participants: City of League City

Project Description: The City of League City (City) seeks to mitigate 16 Severe Repetitive Loss structures by elevating the structures at or above the base flood elevation plus City’s freeboard requirement, or to known “high water marks”. The structures are single family residential structures and the owners have voluntarily committed to the elevation of their structures. The structures have had 115 claims and experienced over \$3,438,821.01 in paid claims. Total project cost is an estimated \$2,830,297.00 and the City is requesting 100 percent Federal funding with no local cost share requirement. The project has a positive BCR of 1.15.

Period of Performance:

3 years

Item Summary	March 4, 2014
The application and documentation submitted by the applicant for consideration of this financial assistance has been reviewed by Contract Administration and meets funding requirements.	 Signature David Carter
The Texas Water Development Board is authorized to provide funding for this application which meets legal requirements of the subject financial assistance program.	 Signature General Counsel

City of Nassau Bay – Elevation Project
Federal Emergency Management Agency- Flood Mitigation Assistance

Proposed Project Funding:

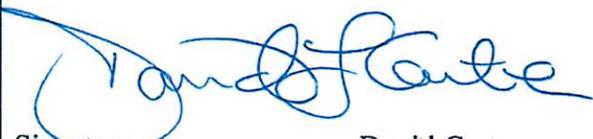
Federal Share:	\$ 5,677,002.42
Local Share:	<u>\$ 837,125.58</u>
Total Project Cost:	\$ 6,514,128.00

Participants: City of Nassau Bay

Project Description: The City of Nassau Bay seeks to mitigate 36 Severe Repetitive Loss and Repetitive Loss structures by elevating the structures at or above the base flood elevation plus the City’s freeboard requirement, or to known “high water marks”. The structures are single family residential structures and the owners have voluntarily committed to the elevation of their structures. These structures have had 140 claims and experienced \$7.9 million in paid claims. Total project cost is an estimated \$6,514,128.00 and the City has provided evidence that between the City and the homeowners the 13 percent local cost share of \$837,125.58 will be met. The project has a positive BCR of 1.5.

Period of Performance:

3 years

Item Summary	March 4, 2014
The application and documentation submitted by the applicant for consideration of this financial assistance has been reviewed by Contract Administration and meets funding requirements.	 Signature David Carter
The Texas Water Development Board is authorized to provide funding for this application which meets legal requirements of the subject financial assistance program.	 Signature General Counsel

Jefferson County Drainage District No. 6 – Cherokee Drainage Project
Federal Emergency Management Agency- Flood Mitigation Assistance

Proposed Project Funding:

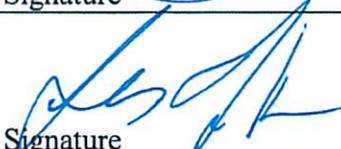
Federal Share:	\$ 1,005,645.00
Local Share:	<u>\$ 335,215.00</u>
Total Project Cost:	\$ 1,340,860.00

Participants: Jefferson County Drainage District No. 6

Project Description: The goal of the Cherokee drainage project is to eliminate repetitive flooding of 64 properties within the 72-acre benefit area by enhancing the existing underground drainage system. The current project area drainage system is inadequate and overloaded with the amount of run-off generated in 72- acres benefit area. The proposed project will consist of installing approximately 2,950 linear feet of underground pipe culverts of varying sizes ranging from 72-inch diameter down to 30-inch diameter. In addition, there will be 12 inlet structures and four (4) junction boxes constructed to redirect run-off. Total project cost is an estimated \$1,005,645.00 and Jefferson County Drainage District No. 6 has provided evidence that they will provide the 25 percent local cost share of \$335,215.00. This project has a positive BCR of 3.06.

Period of Performance:

3 years

Item Summary	March 4, 2014
The application and documentation submitted by the applicant for consideration of this financial assistance has been reviewed by Contract Administration and meets funding requirements.	 Signature David Carter
The Texas Water Development Board is authorized to provide funding for this application which meets legal requirements of the subject financial assistance program.	 Signature General Counsel

ATTACHMENT B

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472



FEMA

JAN 09 2014

MEMORANDUM FOR: Regional Administrators
Regions I-X

ATTENTION: Regional Mitigation Division Directors
Hazard Mitigation Assistance Branch Chiefs

FROM: Roy E. Wright
Deputy Associate Administrator for Mitigation

SUBJECT: Period of Performance for FY13 Pre-Disaster Mitigation and
Flood Mitigation Assistance Grants

This memorandum extends the Period of Performance (POP) for Grants under the Fiscal Year (FY) 2013 Pre-Disaster Mitigation (PDM) and Flood Mitigation Assistance (FMA) programs. The Hazard Mitigation Assistance (HMA) Unified Guidance released on July 12, 2013 details the POP for all HMA programs. The Guidance states, "The POP is the period during which the Grantee is expected to complete all grant activities and to incur costs. The POP for the Program begins with the opening of the application period and ends no later than 36 months from the close of the application period." Based on feedback I have received, I extend the POP by the time required for FEMA's initial review and selection of PDM and FMA subapplications.

The revised POP end date for the PDM Program is now 24 months from January 9, 2014. The POP end date for the FMA Program is now 36 months from January 9, 2014.

Requests for extensions to a grant POP will be evaluated by FEMA but will not be approved automatically. The Regional Administrator can extend the POP for up to 12 months with justification. All requests to extend the grant POP beyond 12 months from the original grant POP end date must be approved by FEMA Headquarters. All extension requests must be submitted to FEMA at least 60 days prior to the expiration of the grant POP and justifications must be submitted in writing.

If you have any questions, please contact Kayed Lakhia, Deputy Director, Risk Reduction Division at (202) 646-3458.

Attachment B
Reallocation Supporting Documentation

U.S. Department of Homeland Security
FEMA Region 6
800 N. Loop 288
Denton, TX 76209



FEMA

February 5, 2015

Ms. Kathy Hopkins
Mitigation Specialist
Texas Water Development Board
P. O. Box 13231
1700 N. Congress Avenue
Austin, Texas 78711-3231

Reference: EMT-2014-FM-E001 Reallocation of Funds from Project -005 to -002

Dear Ms. Hopkins:

In response to your letter dated January 27, 2015, we are approving your request to reallocate \$81,047 of funding from project FMA-PJ-06-TX-2013-005 to project FMA-PJ-06-TX-2013-002. This approval is based on the documented budget under run in project -005 and the budget over run in project -002 along with the written concurrence from both subgrantees and the FEMA Program Manager, Marty Chester.

The revised sub-grant application is approved under the following terms and conditions:

1. The Federal Share for project FMA-PJ-06-TX-2013-002 is now \$307,718.00
2. The Federal Share for project FMA-PJ-06-TX-2013-005 is now \$884,579.00
3. The Period of Performance expiration for both projects remains **January 9, 2017**.
4. There are no other changes to the program narrative/scope of work and it remains the objective of this grant during the performance period.
5. Funding during the performance period is limited to costs associated with the remaining scope.

Receipt of this letter is the official correspondence related to your request. As such, this document should be retained in your official grant file. Attached for your convenience is the revised Cost Estimate from e-Grants and a copy of your revised Budget Narrative and Budget Breakdown.

If you have any questions regarding this approval, please contact the program manager, Marty Chester, at (940) 898-5216.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Brown".

Michael J. Brown
Assistance Officer

Texas Water Development Board

P.O. Box 13231, 1700 N. Congress Ave.
Austin, TX 78711-3231, www.twdb.texas.gov
Phone (512) 463-7847, Fax (512) 475-2053

January 27, 2015

Michael Brown
Deputy Director, Grant Management Division
Federal Emergency Management Agency
Region VI, Federal Center
800 North Loop 288
Denton, Texas 76209

RE: Flood Mitigation Assistance, FMA-06-TX-2013: Reallocation of Funds Between City of Alvin, FMA-PJ-06-TX-2013-002 and City of Beaumont, FMA-PJ-06-TX-2013-005

Dear Mr. Brown,

The Texas Water Development Board (TWDB) received the enclosed letters from the City of Beaumont and City of Alvin requesting to reallocate underruns from the City of Beaumont's subgrant to City of Alvin's subgrant to meet their overruns. Both of these subgrants are under the same agreement.

The City of Beaumont's original budget was estimated at \$680,000 to purchase Monterrey Apartment complex in the subapplication. However, the appraisal came in much lower, resulting in \$352,250 underrun. The owner of the complex has accepted this offer. In light of this, City of Beaumont has offered to de-obligate \$81,047 of its underrun to cover the overruns associated in the City of Alvin's subgrant.

The City of Alvin's original budget to purchase both properties was \$143,880, but the appraisals for the two properties came in at \$225,000. The City has requested an additional \$81,047 to account for the overruns in order to purchase both properties.

TWDB concurs and requests FEMA's approval of the reallocation of funds between these subgrants and the subgrants budget's be amended as necessary. Approval of these requests will result in no change to the FEMA approved total funding under agreement FMA-06-TX-2013.

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	:	Kevin Patteson, Executive Administrator

Flood Mitigation Assistance
January 27, 2015
Page 2

All quarterly reports have been submitted on time by both cities.

Should you have any questions concerning this request, please do not hesitate to call me at 512-463-6198.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathy C. Hopkins', with a long horizontal flourish extending to the right.

Kathy C. Hopkins
Mitigation Specialist

Enclosures

c: Marty Chester, Federal Emergency Management Agency



City of Beaumont

December 24, 2014

Kathy Hopkins
Texas Water Development Board
1700 North Congress Avenue
P.O. Box 13231
Austin, TX 78711-3231

RE: Reallocation of Unneeded Funds the 2505 Sweetgum Project

Dear Ms. Hopkins:

Please reference the contract between the City of Beaumont and the Texas Water Development Board for the acquisition/demolition of **2505 Sweetgum Lane**, more commonly known as the Monterrey Apartment complex.

The original budget in the grant application estimated the market value for this property at \$680,000.00. Following FEMA guidance, each property was appraised by a State certified, independent appraiser for the purpose of establishing the actual offer amount.

The appraisals came in much lower than budgeted, resulting in an underrun of \$352,250.00. The owner has accepted this offer. It is the City's understanding that another city in Texas has an overrun in the amount of \$81,047.00 and is in need of funds from the City of Beaumont's grant to cover this overrun. The City of Beaumont has no objection to de-obligating \$81,047.00 of our projected \$352,250.00 to cover the above mentioned overrun. If you need any additional information, please do not hesitate to contact me at (409) 880-3100.

Sincerely,

Kyle Hayes
City Manager



CITY OF ALVIN

1100 West Highway 6 • Alvin, Texas 77511 • (281) 388-4341 • FAX (281) 331-7516

Engineering Department

Kathy Hopkins
Texas Water Development Board
1700 North Congress Avenue
P.O. Box 13231
Austin, TX 78711-3231

Dear Ms. Hopkins

Please reference the Contract between the City of Alvin and the Texas Water Development Board (TWDB) TWDB Contract No. 1300011762, for the acquisition/demolition of two Severe Repetitive Loss properties in the City.

The original budget in the grant application estimated the market value for each structure at 120% of the tax assessed value. Following FEMA guidance, each property was appraised by a State certified, independent appraiser for the purpose of establishing the actual offer amount.

The appraisals came in higher than budgeted, resulting in an overrun of \$81,047.00. It is the City's understanding that there may be additional funds available to cover this overrun. The City has verbally extended the offers to these owners, both of which have indicated their desire to sell to the City. Please note, the increased actual project costs take the Benefit Cost ratio (B/C) from a 2.44 to a 1.79, still very cost effective.

Details on the costs and revised B/C are attached.

The City and owners are anxious to move forward and the City respectfully requests the contract between the City and TWDB be modified to incorporate these additional costs.

Sincerely,

Michelle H. Segovia

Michelle H. Segovia, P.E.

City Engineer

Budget from Application

Address	Budgeted Market Value	Demo Cost (\$6/sqft)	Closing Costs - Title Ins. + closing costs	Appraisal Fee	Buyout Rep Fee	Supplemental Housing	Survey Fee	Total Proj Cost	Benefits	BCA
1409 W. Talmadge	\$ 60,780	\$ 7,932	\$ 1,172	\$ 500	\$ 1,200	\$ 22,500	\$ 350	\$ 94,434	\$ 276,000	2.92
3404 Hummingbird	\$ 83,100	\$ 8,232	\$ 1,355	\$ 500	\$ 1,200	\$ 22,500	\$ 350	\$ 117,237	\$ 276,000	2.35
								\$ 211,671	\$ 552,000	2.61

Sub App Mgmt Fee	\$ 12,000.00
Pre-award App Dev	\$ 3,000.00
Costs	\$ 211,671.00
Total Costs	\$ 226,671.00
Benefits	\$ 552,000.00
BCA	2.44

Actual after appraisals were received

Address	Actual Market Value	Demo Cost (\$6/sqft)	Closing Costs - Title Ins. + closing costs	Appraisal Fee	Buyout Rep Fee	Supplemental Housing	Survey Fee	Total Proj Cost	Benefits	BCA
1409 W. Talmadge	\$ 75,000	\$ 7,932	\$ 1,002	\$ 500	\$ 1,200	\$ 22,500	\$ 350	\$ 108,484	\$ 276,000	2.54
3404 Hummingbird	\$ 150,000	\$ 8,232	\$ 1,452	\$ 500	\$ 1,200	\$ 22,500	\$ 350	\$ 184,234	\$ 276,000	1.50
								\$ 292,718	\$ 552,000	1.89

Sub App Mgmt Fee	\$ 12,000.00
Pre-award App Dev	\$ 3,000.00
Costs	\$ 292,718.00
Total Costs	\$ 307,718.00
Benefits	\$ 552,000.00
BCA	1.79

Difference	
\$	(81,047.00)