

**STATE OF NORTH CAROLINA
COMMUNITY DEVELOPMENT BLOCK GRANT
PROGRAM
CDBG Recovery (CDBG-R) Substantial
Amendment**



**NORTH CAROLINA DEPARTMENT OF COMMERCE
DIVISION OF COMMUNITY ASSISTANCE
4313 MAIL SERVICE CENTER
1307 GLENWOOD AVENUE
RALEIGH, NORTH CAROLINA 27699-4313
www.nccommerce.com/cdbgforms**

THE CDBG-R SUBSTANTIAL AMENDMENT

Jurisdiction(s): State of North Carolina	CDBG-R Contact Person: Gloria Nance-Sims, Director, Division of Community Assistance
Jurisdiction Web Address: <ul style="list-style-type: none">• www.nccommerce.com/cdbgforms	Address: 4313 Mail Service Center Raleigh, NC 27699-4313 Telephone: 919-733-2850 Fax: 919-733-5262 Email: gnance-sims@nccommerce.com

The State of North Carolina sets forth, in this document, its proposal for utilization of \$12,080,614 in American Recovery and Reinvestment Act of 2009 ("Recovery Act") Community Development Block Grant funding signed into law by President Obama on February 17, 2009. Specifically, this document contains:

1. The CDBG-R Substantial Amendment;
2. Spreadsheet for Reporting Proposed CDBG-R Activities (Attachment 1)
3. Signed and Dated Certifications (Attachment 2);
4. Signed and Dated SF-424 (Attachment 3); and
5. CDBG-R Substantial Amendment Checklist (Attachment 4).

ENSURING RESPONSIBLE SPENDING OF RECOVERY ACT FUNDS

The American Recovery and Reinvestment Act of 2009 (Recovery Act) was signed into law (Public Law 111-5) by President Obama on February 17, 2009. The Recovery Act's appropriation to the US Department of Housing and Urban Development (HUD) includes a special allocation of funds through the Community Development Block Grant (CDBG) Program to states and entitlement local governments to undertake eligible CDBG activities on an expedited basis. This supplemental allocation is separate and distinct from the regular CDBG Program. HUD has specified alternative requirements and made regulatory waivers in order to expedite the use of these funds and to meet the special requirements of the Recovery Act. Funds should primarily be invested in economic development, housing, infrastructure and other public facilities activities that will quickly spur economic investment, increased energy efficiency, and job creation or retention. Activities should substantially address the intent of the Recovery Act. A Memorandum to Heads of Executive Departments and Agencies from President Obama entitled "Ensuring Responsible Spending of Recovery Act Funds" and dated March 20, 2009 states that his Administration is "committed to ensuring that public funds are expended responsibly and in a transparent manner". He wants the executive departments and agencies to help ensure that "funds are expended for projects that further the job creation, economic recovery, and other purposes of the Recovery Act and are not used for imprudent projects". He further elaborates on three points: (1) ensuring merit-based decision-making, (2) avoiding imprudent projects, and (3) transparency of registered lobbyist communications. In developing

procedures for distributing Recovery Act funds, executive departments and agencies had to comply with this memorandum to the extent consistent with the Act.

The State of North Carolina is receiving \$12,080,614 including 10% for the administration of CDBG-R funds for Small Cities-eligible local governments through a competitive process held by the Division of Community Assistance (DCA) in the NC Department of Commerce. In order to meet the objectives of CDBG R, as outlined by HUD, the State of North Carolina selected proposed projects through a competitive application process which were due on Friday, June 12, 2009. As a result, the State of North Carolina received 81 applications from eligible non-entitlement local governments for consideration. Upon review of these applications, the State of North Carolina proposes to select 28 projects for consideration and approval by HUD through this Substantial Amendment to the 2008 Action Plan. This amendment must be submitted to the HUD field office in Greensboro by June 29, 2009. CDBG R funds are not officially awarded nor obligated to a proposed project until the State receives approval and contract for funding from HUD.

The State of North Carolina selected Small Cities-eligible local governments with projects that are “shovel ready”. The State of North Carolina defined “shovel ready” as a project that upon receiving an award must be ready to bid the project as soon as any conditions are released. Priority was given to those projects whose projects can award contracts based on bids within 120 days from the date funds are made available. Preference was also be given to projects with activities that can be started and completed including the goal of using at least 50 percent of the funds for activities that can be initiated no later than 120 days after February 17, 2009 when the Recovery Act was signed into law (per clarification from HUD).

The State of North Carolina utilized a regional distribution system to select proposed CDBG-R projects. The regional allocation percentages for the proposed activities were determined using income and housing condition factors HUD uses to determine state CDBG allocations.

Allocation percentages for the four regions are listed below:

Categories	Region 1	Region 2	Region 3	Region 4
Infrastructure	25%	25%	25%	25%
Housing	17.9%	13.3%	32.3%	36.5%

The highest-ranking applications within each region, which meet the requirements of the Recovery Act, were selected for inclusion in the Substantial Amendment. Funds not fully allocated in one region, either because of an insufficient number of applications or applications not meeting requirements, were moved either to the region(s) with the next highest scoring application(s) or to a region for regional distribution purposes as long as those applications met the requirements of the Recovery Act.

The State reserves the right to de-obligate funds from a project receiving CDBG R funding if that project fails to meet established and approved benchmarks. De-obligated funds will be re-allocated other eligible CDBG R projects.

A. SPREADSHEET FOR REPORTING PROPOSED CDBG-R ACTIVITIES

The State of North Carolina is proposing to award CDBG R funds through three categories of activities. These activities were selected as the most appropriate for addressing the intent of the Recovery Act. The categories are **Infrastructure, Housing, and Special Projects**. Each project must meet a national objective and identifies the creation and/or retention of jobs for the project. In order for a project to be awarded by the State of North Carolina, all projects must meet a minimum of 70 percent low and moderate-income benefit and identify the number of jobs that will be created and/or retained as a result of CDBG R funding. Further, the State of North Carolina required local governments proposing housing activities must meet a 100 percent low and moderate-income benefit plus jobs requirement. A description of each proposed project follows, as required by HUD.

B. CDBG-R INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

Following is a description of how CDBG-R funds the State of North Carolina receives will meet the requirements of Title XII of Division A and Section 1602 of ARRA:

Proposed CDBG R Project	Proposed Project Description
Madison County -Western NC Regional Housing Alliance	Mobilize housing related economic stimulus efforts at a regional level tailored to market conditions and the needs of local governments in 26 county region by assisting families facing foreclosures, organizing project and financing that will put homebuilders, crews and trades people back to work building and renovating homes.
Gaston County-Centralina Regional Housing Alliances Recovery Project	The Alliance will identify barriers in regional housing markets in order to assist low-income and extremely low-income renters and elderly homeowners with cost burdens of affordable housing, weatherization issues and and to enhance the capacity of the development of affordable housing in area.
Town of Grimesland-Mid-East-Upper Coastal Plan-Lumber River COG Housing Alliance	The Alliance will identify barriers in regional housing markets in order to assist low-income and extremely low-income renters and elderly homeowners with cost burdens of affordable housing, weatherization issues and and to enhance the capacity of the development of affordable housing in area.
Town of Forest City Grahamtown Emergency Housing Repair Program	The Town of Forest City will provide emergency repair services for up to to ten (10) housing units. The repairs will prevent immediate threats to the life and/or safety of the homeowner and prevent homeowner displacement due to further deterioration of the property.
Town of Yanceyville Recovery Housing Project	The Town will use funds to assist 15 households located on sections of North Avenue and Wall Street with rehabilitation assistance, demolition/housing replacement and demolition.
Burke County Emergency Repair Housing Project	The County will assist 16 very low and low-income families with emergency repairs to their homes.
Randolph County CDBG R Housing Program	The County will assist 9 low-income families with housing rehabilitation.
Town of Fairmont Housing Recovery	The Fairmont Housing Recovery Project consists of housing activities for clearance of 1 severely dilapidated dwelling unit, relocation of 1 household and the rehabilitation of 9 severely deteriorated dwelling units. All houses proposed for housing activities are occupied by low and moderate income households.
Hyde County CDBG R Scattered Sites Housing Project	The Hyde County CDBG R Scattered Sites Housing Project includes the rehabilitation of 1 housing unit and the on-site relocation of 2 housing units located in the county. The funds will serve low and moderate income households.
Jones County Scattered Site Housing Assistance	The County will use funds to provide clearance and relocation assistance to 3 low and moderate income families living in dilapidated housing. The County will provide relocation assistance while reconstructing new stick built homes on site. The new homes will meet NAHB Green Energy Standards and Energy Star ratings.
Rockingham County Recovery Scattered Site Housing Project	The County will assist 18 low income households with comprehensive rehabilitations and emergency repairs.

Rowan County Recovery Scattered Site Emergency Repairs Housing Project	The County will assist 8 households with emergency repairs.
City of Newton Foreclosure Prevention Assistance	The city will use funds to assist low and moderate income families facing the possibility of foreclosure of their homes. The city will partner with the Western Piedmont Council of Governments, a HUD certified counseling agency, to implement the program.
Town of Clarkton Highway 211 West Project	The Town will use funds to construct 900 linear feet of sanitary sewer, 4 manholes and 13 service taps and connect to an existing gravity line where it will flow to an existing pump station and then be pumped to the Town's WWTP. This proposed project will serve 13 dwelling units.
Town of Hobgood Riddick Street Improvements	The Town will use funds to pave, curb, gutter and make drainage improvements and install a sidewalk on the entire street which is approximately 1,350 feet long. The street is currently gravel that serves 9 households.
Town of Navassa Senior Center	The Town will construct a senior center which will provide medical services for elderly citizens.
Cherokee County Regal Road and Pleasant Valley Road Water and Sewer System Improvements	The County will construct 6,700 linear feet of 6-inch water line, 6,525 linear feet of 8-inch sewer line and 6,760 linear feet of 12-inch sewer line to serve the Pleasant Valley Road, Regal Road, Andrews Road and Highway 19.
Town of Maxton Training Center	The Town will construct a 3,300 square foot training center.
Town of Mount Olive Community Center Renovation	The Town will renovate the train depot to make it more energy efficient and usable.
City of Kings Mountain Battleground Road CDBG Recovery Water Infrastructure Project	The City will install approximately 5,015 linear feet of 16 inch water line to serve 22 single family homes on Battleground Road just outside and southwest of the city limits.
Stanly County CDBG Recovery Waterlines Project	The County will use funds to assist 97 households located in the Tyson Village Mobile Home Park and Rolling Hills Mobile Home Park with infrastructure improvements.
Sawmills Dry Ponds Water Project	The Town will replace 6,800 linear feet of waterlines with 6 and 8 inch PVC pipe to serve 28 households located on Dry Ponds Road, Lakewood Drive and Carl Drive.
City of Rockingham East Rockingham Sewer Project-Jefferson Park	The City will use funds to construct 4,221 linear feet of 8 inch PVC Sanitary Sewer and 5,951 SY of asphalt removal and 9,563 SY of 1 1/2 inch of asphalt overlay. This project will provide public sewer to 38 dwellings in the Jefferson Park neighborhood
City of Cherryville Cedar Street Pump Station Replacement	The City will use funds to provide sewer improvements to 22 homes in the Cedar Street area,
Alexander County Emergency Repair Housing Project	The County will use funds to serve 16 very low and low-income families with emergency repairs to their homes.
Town of Saratoga US 264 Alternate New Sewer Line Extension	The Town will use funds to install sanitary sewer to serve 20 residential units.

Village of Pinehurst Jackson Hamlet Phase 2 Sewer Project	The Village of Pinehurst will use funds to install approximately 4,600 linear feet of 8 inch gravity sewer line to serve 50 single family homes in the second phase of the Jackson Hamlet community.
Village of Alamance	The Village of Alamance will use funds to assist 19 households located on Alamance Baptist Church Loop with sewer infrastructure improvements.

(1) **Jobs Created:** It is anticipated the following number of full-time/part-time jobs will be created and/or retained as a result of CDBG R funds:

Proposed CDBG R Project	Proposed Number of Job Creations/Retentions
Madison County -Western NC Regional Housing Alliance	
Gaston County-Centralina Regional Housing Alliances Recovery Project	
Town of Grimesland-Mid-East-Upper Coastal Plan-Lumber River COG Housing Alliance	
Town of Forest City Grahamtown Emergency Housing Repair Program	10
Town of Yanceyville Recovery Housing Project	146
Burke County Emergency Repair Housing Project	10
Randolph County CDBG R Housing Program	37
Town of Fairmont Housing Recovery	43
Hyde County CDBG R Scattered Sites Housing Project	42
Jones County Scattered Site Housing Assistance	124
Rockingham County Recovery Scattered Site Housing Project	
Rowan County Recovery Scattered Site Emergency Repairs Housing Project	24
City of Newton Foreclosure Prevention Assistance	10
Town of Clarkton Highway 211 West Project	61
Town of Hobgood Riddick Street Improvements	
Town of Navassa Senior Center	32
Cherokee County Regal Road and Pleasant Valley Road Water and Sewer System Improvements	
Town of Maxton Training Center	56
Town of Mount Olive Community Center Renovation	30
City of Kings Mountain Battleground Road CDBG Recovery Water Infrastructure Project	11
Stanly County CDBG Recovery Waterlines Project	24
Sawmills Dry Ponds Water Project	10

City of Rockingham East Rockingham Sewer Project-Jefferson Park	33
City of Cherryville Cedar Street Pump Station Replacement	5
Alexander County Emergency Repair Housing Project	10
Town of Saratoga US 264 Alternate New Sewer Line Extension	31
Village of Pinehurst Jackson Hamlet Phase 2 Sewer Project	6
Village of Alamance	24

Responsible Organization:

Madison County -Western NC Regional Housing Alliance
Vernon Ponder, Chairman, Board of County Commissioners, 828-649-2854

Gaston County-Centralina Regional Housing Alliances Recovery Project
Mickey Price, Chairman, Board of County Commissioners, 704-825-8280

Town of Grimesland-Mid-East-Upper Coastal Plan-Lumber River COG Housing Alliance
Gerald Whitley, Mayor, Town of Grimesland, 252-752-6337

Town of Forest City Grahamtown Emergency Housing Repair Program
James w. Gibson, Mayor, Town of Forest City, 828-248-5202

Town of Yanceyville Recovery Housing Project
Daniel G. Printz, Mayor, Town of Yanceyville, 336-694-5431

Burke County Emergency Repair Housing Project
Wayne F. Abele, Sr., Chairman, Board of County Commissioners, 828-433-1062

Randolph County CDBG R Housing Program
J. Harold Holmes, Chairman, Board of County Commissioners, 336-824-8121

Town of Fairmont Housing Recovery
Charles Kemp, Mayor, Town of Fairmont, 910-628-9766

Hyde County CDBG R Scattered Sites Housing Project

Jones County Scattered Site Housing Assistance
Joseph F. Wiggins, Chairman, Board of County Commissioners, 910-324-4726

Rockingham County Recovery Scattered Site Housing Project
C. H. Jones, Chairman, Board of County Commissioners, 336-342--6171

Rowan County Recovery Scattered Site Emergency Repairs Housing Project
Arnold S. Chamberlain, Chairman, Board of County Commissioners, 704-216-8180

City of Newton Foreclosure Prevention Assistance
Robert A. Mulinax, Mayor, Town of Newton, 828-465-7400

Town of Clarkton Highway 211 West Project
Arthur Whedbee, Mayor, Town of Clarkton, 910-647-0013

Town of Hobgood Riddick Street Improvements
Timothy Purvis, Mayor, Town of Hobgood, 252-826-4573

Town of Navassa Senior Center
Eulis A. Willis, Mayor, Town of Navassa, 910-371-2432

Cherokee County Regal Road and Pleasant Valley Road Water and Sewer System Improvements
W. David Sumpter, III, Chairman, Board of County Commissioners, 828-837-5527

Town of Maxton Training Center
Lillie McKoy, Mayor, Town of Maxton, 910-844-5231

Town of Mount Olive Community Center Renovation
B. R. Huggins, Mayor, Town of Mount Olive, 919-658-9539

City of Kings Mountain Battleground Road CDBG Recovery Water Infrastructure Project
Edgar O. Murphery, Jr., Mayor, Town of Kings Mountain, 704-734-0333

Stanly County CDBG Recovery Waterlines Project
Tony Dennis, Chairman, Board of County Commissioners, 704-474-7581

Sawmills Dry Ponds Water Project
Bobby Austin, Mayor, Town of Sawmills, 828-396-7903

City of Rockingham East Rockingham Sewer Project-Jefferson Park
Eugene b. McLaurin, II, Mayor, City of Rockingham, 910-997-5546

City of Cherryville Cedar Street Pump Station Replacement
Robert Austell, Mayor, Town of Cherryville, 704-435-1710

Alexander County Emergency Repair Housing Project
Larry Yoder, Chairman, Board of County Commissioners, 828-632-9332

Town of Saratoga US 264 Alternate New Sewer Line Extension
Charles Thomas Hawkins, Mayor, Town of Saratoga, 252-238-3478

Village of Pinehurst Jackson Hamlet Phase 2 Sewer Project
Steven J. Smith, Mayor, Village of Pinehurst, 910-295-1900

Village of Alamance
Cathera Bundren, Mayor, Village of Alamance, 336-226-0033

PROPOSED CDBG R BUDGET

SOURCE

HUD CDBG R FUNDING	\$12,080,614
---------------------------	---------------------

USE

PROPOSED LOCAL GOVERNMENT PROJECTS (INCLUDES PROJECT FUNDING + 5% LOCAL ADMINISTRATION)	\$11,476,583
--	---------------------

STATE ADMINISTRATION	\$ 604,031
-----------------------------	-------------------

TOTAL USE	\$12,080,614
------------------	---------------------

C. PUBLIC COMMENT

The State of North Carolina published the Substantial Amendment via the usual methods and posted on the Department of Commerce website at www.nccommerce.com/cdbgforms for no less than 7 calendar days for public comment.

Attachment 1

State Certifications

Attachment 2
Standard Form 424

Attachment 3

Checklist

CDBG-R Substantial Amendment Grantee Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the CDBG-R Substantial Amendment, Spreadsheet for Reporting Proposed CDBG-R Activities, and SF-424.

Contents of a CDBG-R Action Plan Substantial Amendment

Jurisdiction(s): State of North Carolina Jurisdiction Web Address: www.nccommerce.com/cdbgforms	CDBG-R Contact Person: Gloria Nance-Sims, Director, Division of Community Assistance Address: 4313 Mail Service Center Raleigh, NC 27699-4313 Telephone: 919-733-2850 Fax: 919-733-5262 Email: gnance-sims@nccommerce.com
---	--

The elements in the substantial amendment required for the CDBG recovery funds are:

A. SPREADSHEET FOR REPORTING PROPOSED CDBG-R ACTIVITIES

Does the submission contain a paper copy of the Spreadsheet for Reporting Proposed CDBG-R Activities?

Yes X No Verification found on page **Attachment 1**

Does the submission include an electronic version of the Spreadsheet for Reporting Proposed CDBG-R Activities sent to the email box CDBG-R@hud.gov?

Yes X No Date Spreadsheet was emailed: **June 29, 2009**

Does the Spreadsheet for Reporting Proposed CDBG-R Activities include, for each activity:

- amount of funds budgeted for each activity, including CDBG-R funds, any additional Recovery Funds used and total activity budget,
 Yes X No Verification found on page(s) **Attachment 1**
- the Eligibility citation (eligibility regulatory cite or HCDA cite),
 Yes X No Verification found on page(s) **Attachment 1**
- the CDBG national objective citation,

Yes X No Verification found on page(s) **Attachment 1**

B. CDBG-R INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, including:

- a narrative for each activity describing how CDBG-R funds will be used in a manner that maximizes job creation and economic benefit,
Yes X No Verification found on page(s) **Page 5-7**
- projected number of jobs created for each activity,
Yes X No Verification found on page(s) **Page 5-7**
- whether an activity will promote energy efficiency and conservation,
Yes X No Verification found on page(s) **Page 5-7**
- the name, location, and contact information for the entity that will carry out the activity,
Yes X No Verification found on page(s) **Page 8**
- evidence that no more than 10% of the grant amount will be spent on administration and planning,
Yes X No Verification found on page (s) **Page 3**
- evidence that no more than 15% of the grant amount will be spent on public services,
Yes X No Verification found on page (s) **Attachment 1**
- evidence that at least 70% of the grant amount will benefit persons of low and moderate income,
Yes X No Verification found on page (s) **Page 4**

C. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the jurisdiction's usual methods and on the Internet for no less than 7 calendar days of public comment?

Yes X No Verification found on page(s) **Page 10**

Is there a summary of citizen comments included in the final amendment?

Yes X No Verification found on page(s) **Page 10**

D. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|---|------------------------------|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Drug-free Workplace | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Anti-lobbying | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

- | | | |
|--|------------------------------|-----------------------------|
| (5) Authority of jurisdiction | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Consistency with plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Section 3 | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Community development plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (9) Following a plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use of Funds | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (11) Excessive Force | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (12) Compliance with anti-discrimination laws | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (13) Lead-based paint procedures | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with laws | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with ARRA | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (16) Project selection | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (17) Timeliness of infrastructure investments | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (18) Buy American provision | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (19) Appropriate use of funds for infrastructure investments | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (20) 70% of CDBG-R for LMI | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Optional Certification | | |
| (21) Urgent Need | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

D. STATE CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|--|------------------------------|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes X | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation plan | Yes X | No <input type="checkbox"/> |
| (3) Drug-free Workplace | Yes X | No <input type="checkbox"/> |
| (4) Anti-lobbying | Yes X | No <input type="checkbox"/> |
| (5) Authority of State | Yes X | No <input type="checkbox"/> |
| (6) Consistency with plan | Yes X | No <input type="checkbox"/> |
| (7) Section 3 | Yes X | No <input type="checkbox"/> |
| (8) Community development plan | Yes X | No <input type="checkbox"/> |
| (9) Consultation with Local Governments | Yes X | No <input type="checkbox"/> |
| (10) Use of Funds | Yes X | No <input type="checkbox"/> |
| (11) Excessive Force | Yes X | No <input type="checkbox"/> |
| (12) Compliance with anti-discrimination laws | Yes X | No <input type="checkbox"/> |
| (13) Compliance with laws | Yes X | No <input type="checkbox"/> |
| (14) Compliance with ARRA | Yes X | No <input type="checkbox"/> |
| (15) Project selection | Yes X | No <input type="checkbox"/> |
| (16) Timeliness of infrastructure investments | Yes X | No <input type="checkbox"/> |
| (17) Buy American provision | Yes X | No <input type="checkbox"/> |
| (18) Appropriate use of funds for infrastructure investments | Yes X | No <input type="checkbox"/> |
| (19) 70% of CDBG-R for LMI | Yes X | No <input type="checkbox"/> |
| Optional Certification | | |
| (20) Urgent Need | Yes <input type="checkbox"/> | No <input type="checkbox"/> |