

CDBG-R SUBMISSION TEMPLATE **& CHECKLIST**

The American Recovery and Reinvestment Act of 2009 ("Recovery Act") was signed into law by President Obama on February 17, 2009. The Recovery Act awards \$1 billion in CDBG Recovery (CDBG-R) funds to be distributed to cities, counties, insular areas and states, of which \$10 million has been reserved by HUD for its administrative costs and \$10 million of which will be awarded to Indian tribes. Recipients of the remaining \$980 million of CDBG-R funds will be the approximately 1,200 jurisdictions that received CDBG funding in Fiscal Year 2008. This template sets forth the suggested format for grantees receiving funds from CDBG-R. A complete submission contains the information requested below, including:

- (1) The CDBG-R Substantial Amendment (template attached below)
- (2) Spreadsheet for Reporting Proposed CDBG-R Activities (see <http://www.hud.gov/recovery>)
- (3) Signed and Dated Certifications (see <http://www.hud.gov/recovery>)
- (4) Signed and Dated [SF-424](#).

Grantees should also attach a completed CDBG-R Substantial Amendment Checklist to ensure completeness and efficiency of review (attached below).

THE CDBG-R SUBSTANTIAL AMENDMENT

<i>Jurisdiction(s): Washtenaw County</i>	<i>CDBG-R Contact Person:</i> Damon E. Thompson
<i>Jurisdiction Web Address:</i> http://www.ewashtenaw.org/government/departments/community_development/index_html	<i>Address:</i> Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107
	<i>Telephone:</i> (734) 622-9015
	<i>Fax:</i> (734) 622-9022
	<i>Email:</i> thompsonde@ewashtenaw.org

ENSURING RESPONSIBLE SPENDING OF RECOVERY ACT FUNDS

Funding available under the Recovery Act has clear purposes – to stimulate the economy through measures that modernize the Nation’s infrastructure, improve energy efficiency, and expand educational opportunities and access to health care. HUD strongly urges grantees to use CDBG-R funds for hard development costs associated with infrastructure activities that provide basic services to residents or activities that promote energy efficiency and conservation through rehabilitation or retrofitting of existing buildings. While the full range of CDBG activities is available to grantees, the Department strongly suggests that grantees incorporate consideration of the public perception of the intent of the Recovery Act in identifying and selecting projects for CDBG-R funding.

A. SPREADSHEET FOR REPORTING PROPOSED CDBG-R ACTIVITIES

Grantees must provide information concerning CDBG-R assisted activities in an electronic spreadsheet provided by HUD. The information that must be reported in the spreadsheet includes activity name, activity description, CDBG-R dollar amount budgeted, eligibility category, national objective citation, additional Recovery Act funds for the activity received from other programs, and total activity budget. An electronic copy of the spreadsheet and the format is available on HUD’s recovery website at <http://www.hud.gov/recovery>.

Washtenaw County has received notification from the U.S. Department of Housing and Urban Development (HUD) that it has received \$308,567 in federal Community Development Block Grant-Recovery (CDBG-R) Program funds under the American Recovery and Reinvestment Act (ARRA) of 2009. This additional entitlement allocation is to be treated as a substantial amendment to the County's current 2008-2009 Annual Action Plan and utilized for programs or projects which both meet the goals and objectives of the County's 5-Year Consolidated Plan and the legislative intent of President Obama's Economic Stimulus Package. The members of the Washtenaw Urban County include:

- Ann Arbor Township
- Bridgewater Township
- City of Ypsilanti
- City of Ann Arbor
- Northfield Township
- Pittsfield Township
- Salem Township
- Scio Township
- Superior Township
- York Township
- Ypsilanti Township

Washtenaw County proposes to amend the 2008 Annual Action Plan for the purpose of fulfilling the application requirements to receive this special allocation of CDBG funding under the ARRA Act of 2009. Making proper submission of the Substantial Amendment to 2008 Annual Action Plan to HUD by June 5, 2009 will result in Washtenaw County receiving an allocation of \$308,567 to be used for neighborhood infrastructure projects and allowable administration costs. In order to meet or exceed the expedited timeframes as outlined in the ARRA, Washtenaw County proposes to utilize 75 percent (\$231,426) of its CDBG-R allocation under the overarching ARRA objective to modernize the Nation's infrastructure. The Washtenaw County 2008-2013 5-Year Consolidated Strategy and Plan (Con Plan) recognizes infrastructure projects as **medium** priority.

Con Plan identifies infrastructure improvements in the Summary of Specific Annual Objectives as meeting **Objective SL-3(2): Sustainability of Suitable Living Environment**. The specific HUD objective is: To improve the sustainability of public infrastructure and improvements in low-and moderate-income neighborhoods, in order to create suitable living environments. Five (5) neighborhood preservation infrastructure projects have been identified for use with the CDBG-R funding.

The projects are listed below:

1. Superior Township: Harris Road Non-Motorized Trail
2. Salem Township: 6 Mile Road Sidewalk Extension
3. City of Ypsilanti: Forest Avenue Bicycle Lane
4. Pittsfield Township: Sidewalk Improvement Projects
5. Ypsilanti Township: Road Improvement Projects

As required in the application, each activity will be described in detail on the attached pages. Public/human services will be set aside at 15 percent (\$46,285) of the grant to support transportation services for low-income residents and fair housing activities throughout the County. Remaining funds, in an amount not to exceed 10 percent (\$30,856), will be utilized for grant administration.

B. CDBG-R Information by Activity (**Complete for each activity**)

(1) Activity Name:

Category: **Public Facilities and Improvements**

Activity Name: **Harris Road Non-Motorized Trail – Superior Township**

(2) Activity Narrative:

Superior Township has applied for CDBG and CDBG-R funding for the extension of the non-motorized trails on the east side of Harris Road between MacArthur Boulevard and Geddes Road. This extension will connect the existing trails on MacArthur Boulevard to the proposed trails on Geddes Road (east from Prospect Road) scheduled for construction in 2010. The project would install approximately 2,100 lineal feet of 8-foot wide non-motorized asphalt pathway.

Census Tract(s): 4074

Total residents impacted: 2,874 or 56.88% LMI

The estimated project budget is \$150,000 which includes the following sources of funding:

- o 2008 CDBG-R funding: \$60,000
- o 2007 CDBG funding: \$57,026
- o 2008 CDBG funding: \$32,973

(3) Jobs Created:

Activity	Full-time jobs Permanent	Full-time jobs Construction	Full-time jobs Temporary	Part-time jobs Permanent	Part-time jobs Construction	Part-time jobs Temporary
Harris Road Non-Motorized Trail	Retention of 1 job	Creation of 10 jobs				

(4) Additional Activity Information: Washtenaw County has chosen to limit CDBG-R projects to those that modernize the nation’s infrastructure, as that is a priority need in its current Consolidated Plan. Infrastructure projects are also the best projects to simulate the economy in Washtenaw County. Therefore, although all projects will incorporate the latest green and energy conversation techniques, none of the projects targeted will promote smart growth or reduce pollution emissions standards.

(5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

(1) Activity Name:

Category: **Public Facilities and Improvements**

Activity Name: **6 Mile Road Sidewalk Extension - Salem Township**

(2) Activity Narrative:

Salem Township has applied CDBG-R funding to extend the sidewalk along Six Mile Road. The project will connect to the existing sidewalk north of Six Mile Road. The existing sidewalk was constructed in 2006 using CDBG funding in the amount of \$56,000 to allow children to walk safely on a sidewalk to the elementary school in Salem Hamlet not on the side of well-traveled mile road. The project would install approximately 2,810 lineal feet of brushed cement sidewalk, 5' wide by 4" deep (using the same design standards to match the current sidewalk).

Census Tract(s): 4640

Total residents impacted: 64 or 52.5% LMI

The estimated project budget is \$50,000 which includes the following sources of funding:

- o 2008 CDBG-R funding: \$40,000
- o Salem Township GF: \$10,000

(3) Jobs Created:

Activity	Full-time jobs Permanent	Full-time jobs Construction	Full-time jobs Temporary	Part-time jobs Permanent	Part-time jobs Construction	Part-time jobs Temporary
Six Mile Road Sidewalk Extension		Creation of 5 jobs				

(4) Additional Activity Information: Washtenaw County has chosen to limit CDBG-R projects to those that modernize the nation's infrastructure, as that is a priority need in its current Consolidated Plan. Infrastructure projects are also the best projects to simulate the economy in Washtenaw County. Therefore, although all projects will incorporate the latest green and energy conversation techniques, none of the projects targeted will promote smart growth or reduce pollution emissions standards.

(5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

(1) Activity Name:

Category: **Public Facilities and Improvements**

Activity Name: **Forest Avenue Bike Lane – City of Ypsilanti**

(2) Activity Narrative:

The City of Ypsilanti has applied for CDBG-R funding to leverage a \$60,000 grant from the Congestion Mitigation and Air Quality Improvement Program (CMAQ) to construct a bicycle lane along Forest Avenue. This project is part of the Washtenaw County Border to Border Trail initiative (B2B), linking a planned segment of that trail system along Lowell Street to an existing segment in Frog Island Park.

This project will provide additional connectivity into the B2B system from Eastern Michigan University's campus and from existing bike lanes on Forest Avenue east of Prospect, as well as from the neighborhoods adjacent to Forest Avenue. The project is in part an alternative route to the creation of bike facilities along Huron Street between LeForge Road and Forest; that segment, identified in the 2006 Draft Non-Motorized Plan for Washtenaw County, has been determined to be unfeasible due to limited Right-of-Way availability. This project, combined with non-motorized facilities programmed for 2007 on Lowell Street, will complete that connection. This project will additionally advance the 2003 City of Ypsilanti Parks and Recreation Master Plan goal of improving non-motorized connectivity between neighborhoods and park amenities.

Census Tract(s): 4106

Total residents impacted: 2,290 or 83.8% LMI

The estimated project budget is \$135,000 which includes the following sources of funding:

- o 2008 CDBG-R funding: \$75,000
- o CMAQ grant: \$60,000

(3) Jobs Created:

Activity	Full-time jobs Permanent	Full-time jobs Construction	Full-time jobs Temporary	Part-time jobs Permanent	Part-time jobs Construction	Part-time jobs Temporary
Forest Avenue Bike Lane		Creation of 6 jobs			Creation of 1 job	

(4) Additional Activity Information: Washtenaw County has chosen to limit CDBG-R projects to those that modernize the nation's infrastructure, as that is a priority need in its current Consolidated Plan. Infrastructure projects are also the best projects to stimulate the economy in Washtenaw County. Therefore, although all projects will incorporate the latest green and energy conversation techniques, none of the projects targeted will promote smart growth or reduce pollution emissions standards.

- (5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

(1) Activity Name:

Category: **Public Facilities and Improvements**

Activity Name: **Sidewalk Improvements – Pittsfield Township**

(2) Activity Narrative:

Pittsfield Township has applied for CDBG and CDBG-R funding for the design, engineering, and construction of four (4) sidewalk gap filling projects within the Township. The Township has identified areas where a relatively small amount of sidewalk would connect a much larger network.

The proposed projects include:

1. Sidewalk gap filling in three (3) areas along Carpenter Road.
2. Sidewalk gap filling along Packard Road and the installation of new sidewalk along the west side Golfside Road between Packard and Washtenaw.
3. The installation of sidewalk along Washtenaw Avenue between Carpenter and US-23.
4. Sidewalk gap filling in the few remaining areas on the north side of Washtenaw Avenue and the extension of the sidewalk north of Washtenaw Avenue on Golfside to meet the existing sidewalk.

Census Tract(s): 4140, 4142, 4143

Total residents impacted: 5,255 or 62.5% LMI

The estimated project budget is \$160,000 which includes the following sources of funding:

- o 2008 CDBG-R funding: \$13,213
- o 2009 CDBG funding: \$130,000
- o Pittsfield Township: \$16,787

(3) Jobs Created:

Activity	Full-time jobs Permanent	Full-time jobs Construction	Full-time jobs Temporary	Part-time jobs Permanent	Part-time jobs Construction	Part-time jobs Temporary
Pittsfield Township Sidewalk Improvements	Retention of 1 job	Creation of 20 jobs				

(4) Additional Activity Information: Washtenaw County has chosen to limit CDBG-R projects to those that modernize the nation's infrastructure, as that is a priority need in its current Consolidated Plan. Infrastructure projects are also the best projects to stimulate the economy in Washtenaw County. Therefore, although all projects will incorporate the latest green and energy conversation techniques, none of the projects targeted will promote smart growth or reduce pollution emissions standards.

- (5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

(1) Activity Name:

Category: **Public Facilities and Improvements**

Activity Name: **Road Improvements – Ypsilanti Township**

(2) Activity Narrative:

Ypsilanti Township has applied for CDBG and CDBG-R funding for the design, engineering, and construction of five (5) road improvement projects in eligible Low-Mod Areas throughout the Township. A fifth site for a road improvement project will be determined at a future date. The proposed projects include:

1. Midway between Clark and Holmes: Work includes milling the existing surface 1.5 inches, structure adjustments and the placement of 2.0 inch bituminous overlay.
2. Midway south of Holmes, east of Forest: Work includes milling the existing surface 1.5 inches, structure adjustments and the placement of 2.0 inch bituminous overlay.
3. Russell between Ford Boulevard and Ohio: Work includes milling the existing surface 1.5 inches, structure adjustments and the placement of 2.0 inch bituminous overlay.
4. Tuttle Hill Road between Huron River Drive and Textile Road: Work to include pulverizing existing surface and resurface with 3.0 inches of asphalt.

Census Tract(s): 4121, 4122, 4127

Total residents impacted: 5,997 or 57.2% LMI

The estimated project budget is \$293,213 which includes the following sources of funding:

- o 2008 CDBG-R funding: \$43,213
- o 2008 CDBG funding: \$125,000
- o 2009 CDBG funding: \$125,000

(3) Jobs Created:

Activity	Full-time jobs Permanent	Full-time jobs Construction	Full-time jobs Temporary	Part-time jobs Permanent	Part-time jobs Construction	Part-time jobs Temporary
Ypsilanti Township Road Improvements	Retention of 2 jobs	Creation of 30 jobs				

- (4) Additional Activity Information: Washtenaw County has chosen to limit CDBG-R projects to those that modernize the nation's infrastructure, as that is a priority need in its current Consolidated Plan. Infrastructure projects are also the best projects to stimulate the economy in Washtenaw County. Therefore, although all projects will incorporate the latest green and energy conversation techniques, none of the projects targeted will promote smart growth or reduce pollution emissions standards.

- (5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

(1) Activity Name:

Category: **Public/Human Services**

Activity Name: **Public/Human Services – Transportation and Fair Housing**

(2) Activity Narrative:

Washtenaw County intends to use 15 percent of the CDBG-R grant for public/human services to Northfield Human Services to support the \$1 to Ride Program which provides transportation service to low-income residents to employment and medical care and the Fair Housing Center of Southeastern Michigan to support fair housing testing and addressing barriers to fair housing. Northfield Human Services will receive an allocation of \$9,944 in CDBG-R funding and the Fair Housing Center will receive an allocation of \$36,841 in CDBG-R funding.

Census Tract(s): N/A

Total residents impacted: N/A

(3) Jobs Created:

Activity	Full-time jobs	Full-time jobs	Full-time jobs	Part-time jobs	Part-time jobs	Part-time jobs
	Permanent	Construction	Temporary	Permanent	Construction	Temporary
Public/Human Services	Retention of 2 jobs					

(4) Additional Activity Information: N/A

(5) Responsible Organization: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107. Contact Damon Thompson, Operations Manager at (734) 622-9015, (734) 622-9022, email: thompsonde@ewashtenaw.org.

C. PUBLIC COMMENT

Provide a summary of public comments received to the proposed CDBG-R Substantial Amendment.

Note: A Proposed CDBG-R Substantial Amendment must be published via the usual methods and posted on the jurisdiction's website for no less than 7 calendar days for public comment.

The public was originally notified of Washtenaw County's intent to use CDBG-R funds for public improvements by notice published in the Ann Arbor News on May 22, 2009 and posted to the Office of Community Development website on May 25, 2009. The Substantial Amendment was placed on the Office of Community Development website on May 25, 2009 and was also sent to each municipality in the Urban County for local posting. The seven day public comment period will end at 5:00 p.m. on May 31, 2009. **Following is a summary of public comments received to the Substantial Amendment and Washtenaw County's response to each:**

Response:

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): Washtenaw County Lead Agency Jurisdiction Web Address: http://www.ewashtenaw.org/government/departments/community_development/index_html	CDBG-R Contact Person: Damon E. Thompson Address: Office of Community Development, 110 N. Fourth Avenue, Suite 300, Ann Arbor, MI 48107 Telephone: (734) 622-9015 Fax: (734) 622-9022 Email: thompsonde@ewashtenaw.org
--	---

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 No Verification found on page _____

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 No Date Spreadsheet was emailed: _____

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 No Verification found on page(s) _____
- the Eligibility citation (eligibility regulatory cite or HCDA cite),
 Yes No Verification found on page(s) _____

- the CDBG national objective citation,
Yes No Verification found on page(s) _____

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 No Verification found on page(s) _____
- projected number of jobs created for each activity,
Yes No Verification found on page(s) _____
- whether an activity will promote energy efficiency and conservation,
Yes No Verification found on page(s) _____
- the name, location, and contact information for the entity that will carry out the activity,
Yes No Verification found on page(s) _____
- evidence that no more than 10% of the grant amount will be spent on administration and planning,
Yes No Verification found on page (s) _____
- evidence that no more than 15% of the grant amount will be spent on public services,
Yes No Verification found on page (s) _____
- evidence that at least 70% of the grant amount will benefit persons of low and moderate income,
Yes No Verification found on page (s) _____

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 No Verification found on page(s) _____

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

Yes No Verification found on page(s) _____

D. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|---|---|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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