

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

Jurisdiction(s): State of Montana	CDBG-R Contact Person: Karyl Tobel, Section Manager, Commerce Loan Fund; and Gus Byrom, CDBG Program Manager, Public Facilities and Housing
Jurisdiction Web Address: <ul style="list-style-type: none">• http://commerce.mt.gov/	Address: 301 South Park Avenue Helena, MT 59620
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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>.

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

- (1) Activity Name: (Grantees should follow the same order that activities are listed in the Spreadsheet for Reporting Proposed CDBG-R Activities – this will allow HUD to easily match activity narratives with the information provided in the spreadsheet.)

FFY 2008 State of Montana Substantial Amendment Community Development Block Grant Recovery (CDBG-R).

The CDBG Economic Development Program intends to use \$1,525,862.27 of CDBG-R funds for economic development activities. \$1,370,889.33 for projects and \$124,310.16 for administration will be made available to local governments for assistance to timber related and wood product industries that have been affected by the current recession, and \$30,662.78 to be used for CDBG program administration at the state level. The Montana Department of Commerce will use its normal distribution plan and thresholds for these funds. No more than 15% (\$224,279) will be used for public services, specifically, job training grants. A minimum of 70% of activity funds will benefit low and moderate income persons.

CDBG-R funds will be one of three funding sources under a new Montana Department of Commerce program called “Montana Distressed Wood Products Industry Recovery and Stabilization (WPIRS) Program. The WPIRS program will be comprised of 3 funding sources, CDBG-R (CDBG WPIRS), U.S. Economic Development Administration (EDA WPIRS), and state general fund (State WPIRS). These funding sources can provide financing independently or jointly to assist Montana businesses maintain or expand operations.

All funding assistance will be to create or retain critical jobs in businesses that have suffered due to the downturn of the demand for wood products. It is estimated that CDBG-R funding, along with other departmental funding will secure an estimated 1,200 jobs in those businesses that have been hardest hit through the recession. The Department anticipates that the CDBG-R funding alone, will help retain at least 100 jobs in the timber and wood product industries.

Due to the critical financial needs that these businesses have, funding would be distributed immediately upon availability of funding, to the State’s grantees, well within the 120 day period for “ready-to-go”, priority projects. Providing assistance will promote economic development recovery and stabilization in those cities, towns, and counties most affected by job and business losses. CDBG-R investment will in turn, help provide long-term benefits to low and moderate income persons who hold the majority of the

jobs in the wood and timber related industries. Providing funding to these businesses will help prevent the reduction or elimination of essential timber services. The elimination of one sawmill has a negative economic impact not only on the saw mill but local loggers, lumber supply stores, the construction community, local tax base, housing market, school enrollment and retail community.

The Montana Department of Commerce anticipates making initial awards to the following local governments: Powell County for \$800,000 to assist Sun Mountain Lumber retain a minimum of 110 employees; Missoula County for \$400,000 to assist Pyramid Mountain Lumber to retain 120 employees; and Ravalli County for \$295,199.40 to assist Rocky Mountain Homes to retain up to 23 employees.

The CDBG Public Facilities and Housing Program intends to use \$304,014.73 of CDBG-R funds for a public facility activity; \$276,000 for the project and 22,080 for administration will be made available to Judith Basin County to construct an essential services facility. \$5,934.73 will be available for CDBG program administration- Community Development Division.)

Specifically, this project will construct an essential services facility in the community of Geysers to be used by the Judith Basin County Volunteer Fire Department. The facility is estimated to be 40' by 110' with five bays, consisting of a heated, pre-engineered metal facility with one bathroom and would be located on four lots owned by Judith Basin County (Lots 5 and 6 of Block One of the Original Townsite and Lots 15 and 16 of Block One of the First Addition).

The facility would be connected to sewer and water provided by the Geysers Sewer and Water District. The facility would house three fire trucks, one ambulance, an extrication vehicle, and essential services equipment owned by Judith Basin County.

CDBG-R Funding Summary

Community Development Division (CDD)	
Project Funding	\$276,000.00
Project Administration	\$22,080.00
CDD Administration	\$5,934.73
	<hr/>
	\$304,014.73

Business Resources Division (BRD)	
Project Funding	\$1,370,889.33
Project Administration	\$124,310.16
BRD Administration	\$30,662.78
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	\$1,525,862.27

Total Project Funding	90.0%	\$1,646,889.33
Total Administrative Funding	10.0%	\$182,987.67
Total CDBG-R Funding		<u>\$1,829,877.00</u>

(2) Activity Narrative:

In addition to the Spreadsheet for Reporting Proposed CDBG-R Activities, grantees must provide a narrative for each activity describing how the use of the grantee’s CDBG-R funds will meet the requirements of Title XII of Division A and Section 1602 of ARRA. The grantee’s narrative must also state how CDBG-R funds will be used in a manner that maximizes job creation and economic benefit in relation to the CDBG-R funds obligated, and will address the Recovery Act, by:

- Preserving and creating jobs and promoting economic recovery;
- Assisting those most impacted by the recession;
- Providing investment needed to increase economic efficiency;
- Investing in transportation, environmental protection, or other infrastructure that will provide long-term economic benefits;
- Minimizing or avoiding reductions in essential services; or
- Fostering energy independence.

CDBG Economic Development Program

The CDBG WPIRS program will address the requirements of Title XII of Division A and Section 1602 of ARRA by the following:

- Preserving and creating jobs and promoting economic recovery

It is estimated that between 1,200 and 1,600 jobs held in Montana’s timber and wood product industry related businesses are at risk due to the downturn in the demand for wood products. Many of Montana’s saw mills, plywood plants, paper and linerboard manufacturers, bark and byproducts-related businesses, round wood producers, wood chip producers, loggers, log haulers, biochar and biomass producers, and other manufacturers and processors of wood products have had to reduce workforces, scale back services, or close operations for specific periods of time while the construction industry is in a slump. CDBG-R investment will help struggling companies maintain operations, hire back laid-off employees, retain existing employees, and have working capital to provide normal services.

- Assisting those most impacted by the recession

Montana wood product and timber related businesses have been hardest hit by the recession due to the downturn in the construction industry, specifically new home building efforts. State-wide, those related businesses impacted by the reduced demand for wood products, employ around 9,000 people, of which most are low and moderate income jobs.

Management of Montana’s forested lands is highly dependent upon the various forest products industry sectors. Unlike several of the states in the southern Rocky Mountains, Montana still has the capacity and capability within the sectors of the forest products industry necessary to support forest management activities at the landscape level. These sectors plan and conduct forest management activities, harvest and haul timber, process logs into finished products, and utilize mill residuals.

Montana's forest products industry is highly integrated, with individual sectors relying on other sectors as well as on timber from Montana's forested landscape. For example, the forestry and logging sector is dependent not only on an available supply of timber, but also on having sufficiently sized and diversified wood products and paper manufacturing sectors to purchase and utilize harvested trees. Likewise, wood products manufacturers, like sawmills and plywood plants, rely on the forestry and logging sector to harvest and deliver logs to the mills and count on the paper (linerboard) manufacturing and other components of the manufacturing sector (e.g., producers of particle board and medium-density fiberboard to purchase and utilize mill residuals (e.g., sawdust and clean chips).

The existing forest products industry in Montana makes it possible for both public and private landowners to achieve broad land management goals (e.g., fire hazard reduction, ecosystem restoration, watershed protection, post-fire rehabilitation, wildlife and fish habitat restoration, recreation enhancement and revenue generation) by purchasing timber from forest landowners. In short, the sustainability of Montana's forests is dependent on the existence of the state's integrated industry which both supports and relies on a highly-skilled workforce.

- Providing investment needed to increase economic efficiency

CDBG-R investment would also indirectly benefit a much larger portion of the state's forest products industry because of the integrated and inter-dependent nature of the industry. For example, the linerboard, MDF, and particleboard facilities—that rely on the sawmills and plywood plants for mill residuals and employ upwards of 800 Montanans—would benefit because their raw material suppliers would remain viable. These 800 employees account for another \$50 to \$55 million in labor income. Likewise, loggers and trucking firms—that harvest and transport logs and mill outputs and employ well over 2,000 people throughout the state—would benefit by the retention of purchasers for the logs and transportation services they provide. These 2,000-plus employees represent \$80 to \$85 million in labor income.

Ultimately, public and private forest landowners and the forest dependent-communities, with tens of thousands of citizens throughout Montana, would benefit from retention of the integrated industry that provides revenue and the ability to manage forests within the state. Retention of the industry will also enhance private landowners' ability to maintain their forested lands as forests, rather than having to sell, sub-divide, or convert the land to developed uses.

- Investing in transportation, environmental protection, or other infrastructure that will provide long-term economic benefits

The State of Montana needs to implement an economic development strategy to retain its forest products industry. This strategy is needed to include immediate actions to insure that the State's infrastructure is retained, and long-term actions taken to address critical need to increase the availability of timber and wood fiber from its National Forests from a current harvest level of approximately 90 million board feet (MMBF) in 2007 to an economically and ecologically sustainable level of 300 MMBF by 2011.

Montana's forests are a precious asset for the State. They are a key component in any definition of "quality of life". They are also important natural resources that support the State's wood products industry, water quality, and wildlife, and as such, they are vital to the State's tourism and recreation industries. Excluding forest lands that are reserve by statute, or administrative designation, there are about 19.8 million acres of "non-reserved timberland" in Montana that are available for timber harvest. Of that total, the State owns 683 thousand acres, or 3.4 percent.

CDBG-R investment would help reduce operating costs for timber harvesting contractors and wood product manufacturers, increase volume of timber and other fiber harvested from State forest lands, and secure the release of timber from federal lands with timber sales currently in litigation.

- Minimizing or avoiding reductions in essential services

Direct employment in the harvesting and processing of timber and manufacturing of wood and paper products in Montana has declined sharply since 2005, following trends in U.S. home-building, domestic lumber consumption, and in-state timber harvest. In 2005, employment was approximately 10,500; while the 2008 figure is estimated to be about 9,100 workers. Wood products and paper manufacturing employment—at sawmills, plywood plants, linerboard and reconstituted panel mills, log home facilities, post and pole yards, log furniture manufacturers, and various other facilities—are the largest component of the forest products industry, accounting for more than 5,000 (56 percent of) employees in the forest products industry. Employment in forestry and logging accounts for another 2,000-plus (22 percent of) employees in Montana’s forest products industry.

Worker earnings (in constant 2008 dollars) from the harvesting and processing of timber and manufacturing of wood and paper products in Montana have also declined since 2005. In 2005, worker earnings were slightly more than \$451 million; while the 2008 figure is estimated to be about \$380 million. Wood products and paper manufacturing account for about 66 percent of labor income in the forest products industry. Forestry and logging accounts for another 20 percent of the forest products industry total.

It goes without saying that a loss of jobs in the timber and wood product industry would reduce or eliminate critical services for forest related economic development, transportation, new construction, biomass development, and other related commerce.

- Fostering energy independence.

CDBG-R investment could encourage struggling wood and timber related businesses to explore other product lines until the current recession is over and the economy picks-up. Other related product lines could include the development of biomass and bio-fuels or other energy efficient services that would allow for greater energy independence in Montana.

CDBG Public Facilities and Housing

- Preserving and creating jobs and promoting economic recovery; Providing investment needed to increase economic efficiency;

The Geyser Essential Services Facility sponsored by Judith Basin County is critical to the existing and expanding economic opportunities of the region, principally for persons of low and moderate income as well as to the entire community.

Businesses will be reluctant to remain operating or to locate within Geyser and Judith Basin County without adequate fire protection. Insurance rates will also significantly impact their profitability. Persons of low and moderate income rely on jobs within the community to sustain their households and provide a means to survive. They also need assurance of adequate fire protection and quick response times in case of an emergency. Residents are financially impacted by insurance rates on their personal property or their landlord’s insurance rates being passed on to them through rental fees.

The proposed Geyser project is directly related to the expansion and improvement of the quantity and quality of community services, principally for persons of low and moderate income, which are essential to preserve and create jobs and for the overall development of viable communities.

- Assisting those most impacted by the recession;

The current economic recession especially impacts small, rural communities which were already struggling with the lack of economic development even before the recession occurred.

Fire service is one community service desperately needed by low and moderate income residents, especially in a rural county like Judith Basin. Low and moderate income residents find themselves living or working in unsafe conditions, especially sub-standard housing with potential for fire hazards. In 2002, a community-wide income survey documented the community of Geyser to be 70 percent low and moderate income (LMI). These LMI residents depend on emergency services and personnel who will be able to respond when a fire occurs. The fire service personnel are the first responders in rural communities and respond to all types of emergencies, including medical, fire, personal assistance, vehicle accidents, and general distress calls.

- Providing investment needed to increase economic efficiency;

This project will provide a long-term solution to Judith Basin County and the town of Geyser's essential service facility needs within the region. Currently, there is a serious deficiency with inadequate storage for vehicles creating an inability to respond in a timely manner or at all when the weather conditions are extreme. Fire service is a basic safety need for all residents and businesses within any community. Without fire service, businesses are resistant to operate in the area and residents are impacted by a lack of jobs and personal safety issues.

- Investing in transportation, environmental protection, or other infrastructure that will provide long-term economic benefits;

The proposed Geyser project is directly related to assisting communities in providing appropriate and long-term solutions to serious deficiencies in basic infrastructure which are detrimental to the public health and safety and detract from further community development, or which are necessary to meet other essential community needs; 100% of the Geyser unincorporated area will be assisted through this project. CDBG funds will reduce any costs that county residents will need to pay in order to construct a new essential services facility. This project has far-reaching implications and benefits. A broader community of residents in neighboring counties will indirectly benefit by this project as they will be able to receive assistance from the Geyser facility based upon the Judith Basin County Fire Department Memorandum of Understanding when requested.

- Minimizing or avoiding reductions in essential services; or

Emergency services are always a problem requiring immediate attention. If an entity is not able to respond quickly in a timely manner, lives and property are subject to be lost.

Currently, the volunteer department has a building that is able to house four response vehicles end to end (two bays). Often an ambulance or extrication vehicle has to be moved before a fire vehicle is able to respond to an emergency or vice versa. In the winter, one fire truck must be drained and left outside in an unsecured manner in order to house the ambulance. In the summer, the two fire trucks are housed in the

building and the ambulance remains parked outside in an unsecured manner. When vehicles are parked outside, they are subject to vandalism or harsh weather. The existing building is located on lots within Geyser adjacent to a secondary highway. In order for the volunteers to park the emergency vehicles within the facility, they must be maneuvered crosswise in the secondary highway and back up hill into the facility, creating a traffic hazard. There is no room for expansion at this building site. A portion of the building is built on 4 ft. centers and is becoming unstable. The existing building is adjacent to a tavern. Patrons frequently park in front of the fire hall blocking the exit doors.

According to the Bureau of Economic Analysis Judith Basin County had a per capita personal income of \$17,687 in 2000, which ranked 43rd out of 56 counties in the State of Montana. According to the U.S. Bureau of Census in 2000, 14.6% of the households made less than \$10,000, 10.7 percent made \$10,000 to \$14,999, and 19.7% made \$15,000 to \$24,999.

- Fostering energy independence.

Judith Basin covers a region 1,869.85 square miles with a population of 2,329. The region is characterized by many windy days, very cold arctic air in the winter, and changes of up to 80 degrees over a 24-hour period. The latest energy conservation techniques will be incorporated into the design of the proposed facility.

- (3) Jobs Created: (Report the number of full- and part-time jobs estimated to be created and retained by the activity (including permanent, construction, and temporary jobs)).

CDBG Economic Development

It is anticipated that with CDBG-R funding participation through the WPIRS program, an estimated 1,200 full time jobs will be retained, restored, or created as a result of grant and loan financing. The Department anticipates that through CDBG-R financing alone, 100 jobs will be retained in the timber and wood product industries.

CDBG Public Facilities and Housing

All volunteer staff serves as ambulance responders and fire fighters.

- (4) Additional Activity Information: (A description of how the activity will promote energy conservation, smart growth, green building technologies, or reduced pollution emissions, if applicable.)

Public Services will not be an eligible activity for CDGB-R.

CDBG Economic Development

CDBG-R investment would help reduce operating costs for timber harvesting contractors and wood product manufacturers, increase volume of timber and other fiber harvested from State forest lands, and secure the release of timber from federal lands with timber sales currently in litigation. Retention of the industry will also enhance private landowners' ability to maintain their forested lands as forests, rather than having to sell, sub-divide, or convert the land to developed uses.

CDBG Public Facilities and Housing

Overall, the new proposed Geysers essential services facility will constitute a critical part of the vital services and facilities needed by the residents of Geysers and the surrounding area of Judith Basin County.

- (5) Responsible Organization: (Contact information for the organization that will implement the CDBG-R activity, including its name, location, and administrator contact information)

CDBG Economic Development

Karyl Tobel, Section Manager, Commerce Loan Fund

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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.

Response:

Written Comments Received:

Lyle W. Phillips President and CEO of Montana West Economic Development: Expressed support for the amendment and CDBG-R. Commented dollars will benefit Montanans in many ways and is looking forward to seeing the positive results of the program.

Public Hearing Comments Received:

The Public Hearing was published in newspapers across the state as well as on our agency website for over 7 days notice. The hearing was held June 11, 2009 in our conference room with agency staff and one other participant attending. There were no comments made but all questions of the participant were answered.

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 Montana Lead Agency Department of Commerce Jurisdiction Web Address: http://commerce.mt.gov/	CDBG-R Contact Person: Karyl Tobel, Section Manager, Commerce Loan Fund; and Gus Byrom, CDBG Program Manager, Public Facilities and Housing Address: 301 South Park Avenue Helena, MT 59620 Telephone: (406) 841-2733 – Tobel (406) 841-2777 - Byrom Fax: (406) 841-2731 Email: karylt@mt.gov gbyrom@mt.gov
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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 **15**

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: **6/17/09**

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) **15**
- the Eligibility citation (eligibility regulatory cite or HCDA cite),
 Yes No Verification found on page(s) **15**

- the CDBG national objective citation,
Yes No Verification found on page(s) 15

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) 3-9
- projected number of jobs created for each activity,
Yes No Verification found on page(s) 9
- whether an activity will promote energy efficiency and conservation,
Yes No Verification found on page(s) 9
- the name, location, and contact information for the entity that will carry out the activity,
Yes No Verification found on page(s) 10
- evidence that no more than 10% of the grant amount will be spent on administration and planning,
Yes No Verification found on page (s) 3-5
- evidence that no more than 15% of the grant amount will be spent on public services,
Yes No Verification found on page (s) 9
- evidence that at least 70% of the grant amount will benefit persons of low and moderate income,
Yes No Verification found on page (s) 3-9

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) 11

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

Yes No Verification found on page(s) 11

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 No
- (8) Community development plan Yes No
- (9) Following a plan Yes No
- (10) Use of Funds Yes No
- (11) Excessive Force Yes No
- (12) Compliance with anti-discrimination laws Yes No
- (13) Lead-based paint procedures Yes No
- (14) Compliance with laws Yes No
- (15) Compliance with ARRA Yes No
- (16) Project selection Yes No
- (17) Timeliness of infrastructure investments Yes No
- (18) Buy American provision Yes No
- (19) Appropriate use of funds for infrastructure investments Yes No
- (20) 70% of CDBG-R for LMI Yes No

Optional Certification

- (21) Urgent Need Yes No

D. STATE CERTIFICATIONS

The following certifications are complete and accurate:

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

Optional Certification

- (20) Urgent Need Yes No