

## Citizen Participation

This draft action plan is being made available on the Department of Economic website for a seven day comment period beginning August 16, 2013 and ending on August 22, 2013. Local governments must be cognizant of the needs of Limited English Proficiency (LEP) persons in their jurisdictions, and must make reasonable accommodations to ensure that this information is available to all persons.

The following comments were received:

- 1) No cap on per project funding could mean the pool is swallowed up by a handful of very large projects (tends to favor urban areas)  
*DED response: The priority is still to use these funds as gap financing tools. Disaster recovery runs the spectrum as far as size and amounts of projects are concerned, and it's very difficult to set a cap on disaster recovery. DED will allocate these funds as best we can to assist in priority recovery projects.*
- 2) Administration at 2% will be pretty tight for most projects.  
*DED response: HUD is only allowing a small cap on administration for both state and local administration of these funds. We understand that 2% is not very much administration; however, we suggest that grantees inject sufficient funds to cover administration. We're still going to use these funds as gap financing. DED's evaluation process for all CDBG applications includes local leveraging. With limited CDBG funding, the inclusion of local funds in projects is more important than ever. To ensure sufficient administration funding, grantees are encouraged to pay for administration from local funds.*
- 3) If a project is funded in phases, is there a guarantee of funding subsequent phases? I.e., if I get engineering funded for a project, is the construction guaranteed to be funded, or is it first come, first served? Put another way, will you obligate entire projects (regardless of the number of phases), or will you obligate phases only? You'd hate to get half a project built, and then the money runs out for the last phase.  
*DED response: DED will approve an entire project. Due to the strict two year expenditure requirement, we'll obligate in phases (unless the entire project is guaranteed to finish in two years); that's how HUD will obligate to us as well. However, we're not going to approve only half a project; we'll approve the whole thing. The key point here is terminology. We'll approve an entire project, but only obligate (via funding approval) what can certainly be expended in two years. There will be one project approval, but possibly a series of actual obligations.*