Louisiana Community Development Block Grant (LCDBG) Program

Public Facilities Program Application Information

Funding cycle: FY 2026-2027 | Last updated: August 2025

Program overview and priorities

The Louisiana Community Development Block Grant (LCDBG) Program is run by the Office of Community Development – Local Government Assistance (OCD-LGA). All projects funded through the program must meet at least one of the three national objectives set by the U.S. Department of Housing and Urban Development (HUD):

- Provide a clear benefit to low- and moderate-income people (at least 51 percent of those served)
- Eliminate or prevent slums or blight
- · Address an urgent community need

Louisiana expects to receive about \$22 million in CDBG funds from HUD, with roughly \$12 million for the LCDBG Public Facilities Program. Every two years, OCD-LGA surveys eligible communities to set funding priorities. Public infrastructure is consistently ranked highest.

For FY 2026, Public Facilities Program funds will focus on:

- Sewer improvements
- Potable water improvements
- Street improvements

OCD-LGA advances these federally required objectives by improving quality of life, creating jobs, encouraging private investment, revitalizing neighborhoods, and responding to urgent threats to health and safety.

Application process

The LCDBG Public Facilities Program runs on a two-year funding cycle with two phases.

Phase I – severity packages

- 1. Submit Project Severity packages by May 22, 2025.
- 2. OCD-LGA scores and reviews these packages for FY 2026–2027 funding.

Phase II – full applications (FY 2026)

- 1. July 21, 2025 Past performance reviewed.
- 2. August 14, 2025 Invitations sent to top 60 percent of applicants.
- 3. August 27, 2025 Virtual application workshop at 9:00 a.m.
- 4. December 15, 2025 Full applications due by 4:30 p.m.

If a FY 2026 application meets the past performance criteria and is in the top 60 percent but is not funded, it will be considered for FY 2027 funding.

Application submission

Each eligible applicant may submit **only one application.** Applications will be accepted until 4:30 p.m. on December 15, 2025. You can submit your application to the following email address CDBG.APPLICATIONS@la.gov . Applications must be submitted electronically. Any application submitted through mail will not be considered.

Citizen participation requirements

Before you apply, you must:

- Adopt a Citizen Participation Plan (Section 104, Housing and Community Development Act).
- Hold a public hearing to collect resident input following your Citizen Participation Plan.
- Make your plan available at the public hearing.
- Make your completed application available.

You can find more information and requirements on the OCD-LGA website: <u>LCDBG Forms and Information</u>. For questions, contact Denease McGee at OCD-LGA: (225) 342-7412.

Professional services procurement

You may use LCDBG funds to pay for engineering. Federal regulations (<u>2 CFR Part 200 Subpart D</u> - Procurement Standards) set the standards for procuring these services.

Applicants must have written procedures for how they procure professional services. These services may have been procured before submitting the project severity package.

Detailed guidance on proper procurement procedures is available in the Procurement Procedures document on the OCD-LGA website: LCDBG Forms and Information.

Pre-Agreement and Administration costs are not eligible for the 2026—2027 Public Facilities program.

For guestions, contact Denease McGee or William Hall at OCD-LGA: (225) 342-7412.

Eligible activities and restrictions

For the LCDBG FY 2026–2027 Public Facilities program, the priority activities under Section 105(a) are (1), (2), and (13).

If your water system is rated "D" or "F" or your sewer system is under a compliance order, you cannot apply for a different type of project unless you receive approval from the Louisiana Department of Health (LDH) or the Department of Environmental Quality (DEQ).

Single-purpose grants only

The OCD-LGA will only accept single-purpose grant applications under the Public Facilities program. A single-purpose grant funds one main project, which can include smaller supporting activities.

Examples of supporting activities include:

- Adding drainage improvements when upgrading streets
- Buying land for a new wastewater treatment plant
- Installing service connections for a new water system

Funding limits and minimum project size

The State has set maximum funding amounts for projects:

- Street projects: \$1,000,000
- Sewer and water projects (including sewer treatment, sewer rehabilitation, new sewer, and potable water, including multi-jurisdiction projects): \$2,000,000

Projects must include at least \$350,000 in construction costs. Projects below this amount will not be considered for funding or scored.

Eligible applicants

Each eligible applicant may submit only one application for the Public Facilities program.

- Eligible: Non-entitlement local governments (municipalities and parishes)
- **Not eligible:** Alexandria, Baton Rouge, Bossier City, Hammond, Jefferson Parish, Kenner, Lafayette Parish, Lake Charles, Monroe, New Orleans, St. Tammany Parish, Shreveport, Slidell, Terrebonne Parish, and Thibodaux.

Determining the applicant

The rules for determining the applicant depend on whether most beneficiaries are in one local government or spread across multiple jurisdictions.

Majority in one jurisdiction: If more than 51 percent of beneficiaries are in one local government, that government is typically the applicant.

Exceptions include:

- A local government owns the utility system, but most users live outside its borders—the owning government is the applicant.
- A municipality plans to extend its system to an unincorporated area—the municipality may be the applicant, but annexation must occur before the grant closes.

In these cases, the applicant must consult with OCD-LGA staff to confirm eligibility. Only the applicant must meet the performance threshold. The applicant must also enter into a cooperative agreement with other local governments involved, and a copy must be included in the application.

No majority or regional project: If no local government has more than 51 percent of beneficiaries or if a regional project is planned, the application is considered multijurisdictional.

Steps include:

- 1. Meet with OCD-LGA staff before submitting.
- 2. Designate one applicant to apply and act on behalf of all participating governments.
- 3. The designated applicant must retain ownership of improvements and meet performance threshold requirements¹
- 4. Each government must hold a public hearing and publish required notices.
- 5. Each government must provide signed assurances for the application.

¹ Other governments don't have to meet thresholds, but they must not be on the OCD-LGA Sanction List.

6. The designated applicant must have a multi-jurisdictional agreement with all other governments confirming compliance with the Housing and Community Development Act. A copy of the agreement must be included in the application.

Other situations

If a project does not clearly fit these rules, the local government must consult with OCD-LGA staff to determine the appropriate applicant.

Eligibility and performance requirements for applying

To be approved for a public facilities grant, applicants must show they have the capacity to manage the project and a good track record in the LCDBG Program. The state uses these requirements to make sure projects are completed on time. Performance and capacity reviews will be done on:

- July 21, 2025 for FY 2026 applicants
- July 21, 2026 for FY 2027 applicants

Eligibility thresholds for FY 2026

Applicants must meet all of the following to be considered:

- All LCDBG grants from before FY 2023 must be conditionally closed out. This includes CDBG-CV funds.
- All audit and monitoring findings from the State or HUD must be cleared.
- All required reports, documents, and requested data must have been submitted on time.
- Any debts owed to HUD or the State must be repaid or on a current repayment plan.
- The applicant must not be on the OCD-LGA's sanctioned communities list.

Only applicants who meet these requirements and are invited to submit a full application will be rated and ranked for funding.

Key FY 2026 deadlines

- Closeout documents (except clear lien certificate) must be submitted by July 14, 2025.
- Clear lien certificate must be submitted by July 21, 2025.
- OCD-LGA monitoring must be completed by June 6, 2025, and any findings cleared before July 21, 2025.

The State is not responsible if submitted documents or monitoring findings cannot be cleared before the deadline. Applicants are responsible for knowing their performance status.

Additional rules

- Some FY 2026 awards may be announced before the State receives funds from HUD, but these will be contingent on receiving those funds.
- Local governments involved in a funded multi-jurisdictional project cannot apply for new public facilities grants until the joint project is conditionally closed out.
- Applicants who meet FY 2026 requirements but are not funded may reapply in FY 2027 if invited.
- Applicants who do not meet threshold requirements in either year will not be considered among the top project severity scores.

Key federal requirements

When preparing your application, keep in mind the following federal requirements for LCDBG-funded projects:

- 1. Property acquisition and relocation (Uniform Act)
 - You must get an appraisal for any property you plan to acquire that is worth more than \$15,000, including easements or servitudes for public facilities.
 - You must pay at least fair market value.
 - All acquisition must be completed before construction begins.
 - Acquisition and relocation can take a long time, so plan your project schedule accordingly.
- 2. Wages and work hours (Davis-Bacon and Contract Work Hours and Safety Standards)
 - o If your construction contract is worth \$2,000 or more, you must pay workers the federal prevailing wage.
 - Workers must be paid at least time-and-a-half for hours worked over 40 in a week.
 - Include the Federal Labor Standards Provisions and the correct federal wage decision(s) in your bid packages, contracts, and bid advertisements.
 - Be aware: prevailing wages are often higher than typical wages in rural areas and may increase your project costs.

3. Audit requirements

- o If your total annual federal expenditures exceed \$1,000,000, you must have a single audit under 2 CFR Part 200 Subpart F.
- o If they are less than \$1,000,000, you must follow state requirements for financial audits or certifications.
- Some audit costs may be reimbursed as an administrative expense.
- 4. Accessibility (Architectural Barriers Act)
 - Any public facility or non-residential building you build, renovate, or rehabilitate with federal funds must be accessible to people with physical disabilities.
 - Examples: ramps at entrances, bathrooms that accommodate wheelchairs.

Project selection process

Preliminary review

LCDBG staff will check each application to make sure it meets basic requirements:

- 1. **On-time submission** You must turn in your application to OCD-LGA by the deadline. Staff will not consider applications received after the deadline.
- 2. **Complete application** You must include all required forms and information. Staff may lower your score if forms are missing or incomplete. If staff find important information is missing, a survey is not random or representative, or the application is poorly organized, they may remove it from consideration.
- 3. **Eligible activities** You must propose activities that the program allows and that meet one of the three national objectives. Staff will not score ineligible activities.

Application scoring and site visits

After the preliminary review, staff will score all public facilities applications that meet the threshold requirements. Staff will use the rating criteria in the State's FY 2026 Proposed Consolidated Annual Action Plan.

Staff will assign each application a raw score and then rank them from highest to lowest. The State may visit any project site to verify the information in the application. If the site visit reveals information that conflicts with the application or program intent, staff may adjust the score, make changes to the application, or remove it from consideration.

Selected applicants may receive a phone call to schedule the visit and to highlight specific items staff will review. Staff may also review additional items during the site visit that were not mentioned during the call.

Rating criteria (maximum 78 Points)

The State expects to use a rating system like the one described below to score public facilities applications for the FY 2026 program year. After scoring, staff will rank applications from highest to lowest based on total points. LCDBG funding will be awarded following this ranking as funds are available. The maximum points for all public facilities categories—water, sewer, and streets—is 78.

Key requirements

- Funded water or sewer projects must fully fix conditions that violate state or federal public health and safety standards.
- LCDBG funds cannot pay for routine repair, operation, or maintenance.
- Street projects must last at least eight years. Routine repairs, like filling potholes or applying temporary surface treatments, are not eligible.
- Drainage work can be done with street projects but must generally follow the streets being improved. Routine cleaning of drainage ditches is not eligible.
- Local governments may select up to two target areas for residential street projects.
 They must improve every street within those areas that qualifies for improvements under the LCDBG program. Boundaries must follow visible markers like streets or streams—property lines alone are not allowed.

Project classification

- Staff will classify projects as serving either a target area or the entire community/system.
- To rate a project as community/system-wide, at least 35 percent of the construction cost (including contingencies) must support community/system-wide activities.
- Projects with less than 35 percent in community/system-wide activities will be rated as target area projects.
- Applications must clearly separate costs for target area and community/system-wide activities.

Rating categories

Benefit to low/moderate income persons (max 5 points)

- Staff will count beneficiaries according to project classification.
- For water and sewer projects serving the whole community, all utility customers count. For target areas, only residents in those areas count.
- Street project beneficiaries include all residents whose EMS/911 addresses are on one of the streets designated for construction work.
- Project engineers must certify beneficiaries. LCDBG staff make final determinations.
- Only projects where at least 51 percent of beneficiaries are low/moderate income qualify for points. Projects serving 60 percent or more low/moderate income residents earn full points.

Cost effectiveness (max 10 points)

- Staff calculate the cost per person benefiting for each project.
- Sewer projects fall into one of three subcategories: new collection systems,
 rehabilitation of collection systems, or treatment systems. A project is classified as a
 new collection system if at least 70 percent of its construction cost is for new collection
 system improvements. If less than 70 percent is for new collection systems, staff will
 classify the project as rehabilitation or treatment. If rehabilitation costs are greater than
 treatment costs, the project is rehabilitation; otherwise, it is treatment.
- Staff group projects by size of the population served and assign points based on relative cost per person. Projects serving more or fewer people are compared with similar projects.
- Resiliency plan costs are excluded from cost calculations.
- Engineering costs will be included in the Cost Effectiveness calculation.
- Cost effectiveness points may vary between FY 2026 and FY 2027.

Project severity (max 50 points)

- Staff assign points based on the severity of existing conditions and the impact on community health and welfare. Priority goes to wastewater systems, potable water systems, and street projects.
- Water and wastewater conditions must comply with State Sanitary Code and other federal/state regulations.
- LDH and DEQ will verify conditions through records or field checks. Problems from lack of routine maintenance will receive lower scores.
- Incomplete or inaccurate applications may receive lower scores and will not be reevaluated.
- Staff will score each action in multi-action projects and pro-rate the severity score accordingly. Unsubstantiated conditions may result in scores below the minimum range.

Table 1: Project severity criteria for wastewater applications

| Proposed action | Point range |
|--|-------------|
| Collection: Replace or rehabilitate collection system components. | 10 to 50 |
| Existing treatment facility: Replace or upgrade existing facility to meet capacity and/or discharge requirements. | 15 to 50 |
| System: New collection system to provide service for un-served areas. | 35 to 50 |
| System: Replace or rehabilitate various components when minimum requirements have been met. | Zero to 50 |

Table 2: Project severity criteria for potable water applications

| Proposed action | Point range |
|---|-------------|
| Source and supply: Replace or rehabilitate source to meet existing demands. | 15 to 50 |
| Distribution: Replace or rehabilitate distribution due to pressure or Maximum Containment Level (MCL) violations. ² | 20 to 50 |
| Storage: New or rehabilitate facility when existing capacity is not capable of meeting current requirements. | 15 to 50 |
| Treatment: Replace or upgrade facility due to existing demand to meet primary drinking water standards. | 20 to 50 |
| System: New water system or extension of existing system to un-served areas. | 35 to 50 |
| System: Replace or rehabilitate various components when minimum requirements have not been met. | |

² The Maximum Contaminant Level (MCL) is established by the U.S. Environmental Protection Agency (EPA).

Residential street construction, rehabilitation, or reconstruction

We will inspect each street included in your application. During the inspection, we record surface conditions, deficiencies, and surface area measurements. Each street receives a condition rating from 0 to 100. Unpaved streets automatically receive a minimum rating of 70.

To calculate the weighted condition rating:

- 1. Multiply each street's condition rating by its surface area.
- 2. Add together the results for all streets in your application.
- 3. Divide that total by the combined surface area of all streets.

Table 3 below shows how this calculation works.

Table 3: Example of weighted condition rating calculation

| Street | Length (feet) | Width (feet) | Area (square feet) | Condition Rating | Area (square feet) multiplied by condition rating |
|--------------|------------------|-----------------|--------------------------|---------------------|---|
| Elm Street | 1,000 | 18 | 18,000 | 70 | 1,260,000 |
| Oak Street | 1,200 | 20 | 24,000 | 78 | 1,872,000 |
| Ash Street | 800 | 16 | 12,800 | 80 | 1,024,000 |
| Cedar Street | 800 | 18 | 14,400 | 74 | 1,065,600 |
| Pecan Street | 900 | 20 | 18,000 | 62 | 1,116,000 |
| Total | | | 87,200 | | 6,337,600 |

We calculate project severity points by dividing the weighted condition rating by 2. Street projects can earn up to 50 points for project severity.

For example, if the weighted condition rating is 72.68, we divide by 2 to get 36.31. We then round this number to 36.3 points.

System consolidation (max 4 points)

You will earn 4 points if your project consolidates two or more existing water or sewer systems into one larger system. To qualify:

- At least one system must be dissolved and fully absorbed into the larger system.
- The larger system must own, operate, and maintain all the systems in the grant.

A simple purchase of another system does not count as consolidation.

If your project is funded, you must:

- For water systems: remove the dissolved system's PWS ID from the LDH database.
- For sewer systems: contact the Louisiana Department of Environmental Quality (DEQ) to cancel the dissolved system's Discharge Permit.

Before submitting your project severity package, you must request a meeting with OCD-LGA. OCD-LGA will make the final decision about whether your project qualifies as a consolidation. Use the form in this package to request the meeting. After the meeting, OCD-LGA will confirm in writing whether your project qualifies for these points.

Application completeness (max 2 points)

- Earn 1 point if you submit all required forms and documents.
- Earn an additional 1 point if OCD-LGA determines no revisions are needed to score your application.

Resiliency criteria (max 5 points)

Resilience means preparing for, responding to, and recovering from adverse events, and adapting to reduce future risks.

• Earn 5 points if you attach a resiliency plan and your cost estimate includes improvements listed in the plan.

Your resiliency plan should:

- List improvements to protect infrastructure.
- Explain how the improvements will reduce the impact of extreme weather.
- Include historical examples of weather-related damage.
- Clearly separate resiliency improvements in the cost estimate.

Your engineer, with input from local officials, should set standards to improve resilience. Use data from FEMA, NOAA, USACE, state agencies, and local officials. One resource is the <u>NOAA</u> <u>U.S. Climate Resilience Toolkit</u>.

Important notes:

- No national standards exist, so your plan should focus on the most likely risks within the project's lifespan.
- In Louisiana, focus on extreme weather and damage from water and wind.
- Costs for resiliency improvements will not count toward Cost Effectiveness scoring.

OCD-LGA will consult with LDH to determine whether resilience items are eligible for points and not included in the cost effectiveness calculation. Because resilience needs vary by system and LDH has a better knowledge of the conditions, they will make the final determination.

Past performance (max 2 points)

You will earn 2 points for past performance unless any of the following applies to grants you received between 2020-2025:

- You needed a second contract or contract extension to finish or close out the grant.
- You were penalized for missing a required benchmark.
- You received a "very serious" deficiency finding during the grant.

Appeals process

You may meet with OCD-LGA staff to review your application and program scores after we announce grant awards. If you request an appeal, these rules apply:

- We only grant appeals if we miscalculated numerical factors.
- You must submit a written appeal request within ten working days of receiving your denial notice.
- We will respond to your request in writing within ten working days.

Complaint procedures

If you want to object to the State's approval of an application, you may submit your objection in writing to OCD-LGA. We only consider objections for these reasons:

- 1. The applicant's description of needs and goals does not match the available facts or data.
- 2. The activities in the application do not address the applicant's stated needs and goals.
- 3. The application does not follow the FY 2026 proposed Consolidated Annual Action Plan or other applicable laws.

Your complaint must:

- Be in writing,
- Clearly explain the reason for your objection, and
- Include data or evidence to support your claim.

Using other funds with LCDBG funds

Some projects may cost more than the maximum amount allowed under the LCDBG Program. In those cases, you may combine LCDBG funds with other funds. However, you must already have those other funds available and ready to spend.

If the additional funds come from loans, grants, or other sources, they must already be awarded or deposited. To prove you have the funds, you must provide one of the following:

- A letter from your local government identifying the source, amount, and location of local cash.
- A line of credit letter from a financial institution stating the loan amount available.
- Proof of funds from a tax or bond election that has already passed.
- A letter from another funding agency stating that the funds have been awarded and are available to spend.

If your application ranks high enough to be considered for funding, LCDBG staff will contact you before the grant award to request proof that the other funds are available. You will have about ten calendar days to provide this proof.

If you cannot provide proof within that timeframe, your project will not be funded. If additional LCDBG funds later become available in the same program year, your project will be reconsidered. You must then provide proof of the other funds. If you still cannot provide proof, your project will no longer be considered.

Public facilities project information

If you have questions about forms or instructions, call OCD-LGA at (225) 342-7412. For hearing-impaired assistance, use <u>Louisiana Relay Service</u>:

• 7-1-1 • 1-800-846-5277 • 1-800-947-5277 (Hamilton Relay) (TTY) (Voice)

Grant sizes

- **\$2,000,000** maximum Sewer treatment, new sewer collection, sewer collection rehabilitation, and potable water projects
- \$1,000,000 maximum Street projects

Each project must include at least \$350,000 in construction costs. Projects under this minimum will not be scored or considered for funding.

Eligible sewer activities

We group sewer activities into three subcategories for rating purposes:

- 1. **New sewer system** For areas without sewer service. May include new lines, manholes, lift stations, force mains, house connections, and treatment plant construction or expansion.
- 2. **Sewer system rehabilitation** Replacing or repairing existing components, such as lines, manholes, or lift stations.
- Sewer treatment Expanding or upgrading treatment facilities to serve an existing system.

How we assign categories:

- If new sewer improvements make up 70 percent or more of the total construction cost, we classify the project as **new sewer system.**
- If new sewer improvements make up less than 70 percent of the cost, or if there is no new system, we classify the project as either **rehabilitation** or **treatment**.
- If rehabilitation costs are higher than treatment plant costs, we classify the project as **rehabilitation**. If not, we classify it as **treatment**.

Eligible potable water activities

Examples of eligible water improvements include:

- Water wells
- Disinfection equipment or facilities
- Storage tanks and pump stations
- New or replacement water lines
- New or improved treatment facilities

Rules for extending water or sewer service to unserved areas:

- LCDBG or other funds must pay for service lines to homes occupied by low- and moderate-income households (owners and renters). Higher-income households must pay for their own service connections.
- Applicants must adopt and enforce procedures to ensure all households connect to the system. This requirement supports the project impact certification, which the engineer must provide.
- Funded water or sewer projects must fully fix existing health or safety violations. You
 can only count households that connect to the system as beneficiaries, and if the project
 affects an entire system, you must include all connected households—even those
 outside municipal limits.

- LCDBG funds cannot pay for non-residential connections.
- Applicants invited to submit a full application must include income verification for all hookups.
- Hook-up fees may apply, but strict federal rules limit how LCDBG funds can cover them.
 If you plan to charge fees, you must meet with OCD-LGA staff before submitting your application.
- If more than 25 percent of surveyed households say "no" to paying monthly user fees, the project will not be considered.

System limitation: Each application can only cover one utility system, except in cases where multiple systems are consolidating into one.

Not eligible: Federal rules do not allow expenses for repairs, operations, or routine maintenance.

Eligible street activities

You may apply for:

- **Reconstruction** of paved streets reworking the base course and adding a cement or asphaltic concrete wearing course (not surface treatment).
- **Rehabilitation** of paved streets fixing surface deficiencies and base failures (patching, sealing, planning) before adding a wearing course (not surface treatment).
- **New construction** paving gravel or unpaved streets with proper base course and cement or asphaltic concrete wearing course (not surface treatment).

The engineer will decide what type of base course and wearing course the project needs.

Requirements:

- Existing paved streets must be in "fair" or "poor" condition under the sufficiency rating data guide for LCDBG street projects.
- Work must have a **useful life of at least 8 years** to qualify. Routine ditch cleaning or pothole filling alone is not eligible.

Other eligible street items include: curbs, gutters, relief layers, leveling courses, widening, ditch reshaping, side drains, cross drains, and manhole or valve adjustments.

Street project rules

- Each applicant may propose up to two target areas.
- You must improve all eligible streets within a target area.

- Beneficiaries are residents with an EMS/911 address on the improved streets (not group homes).
- If only part of a street is improved, only households in that section count.
- Target area boundaries must follow visible landmarks (streets, streams, canals). You cannot gerrymander.
- Each target area must:
 - o Benefit at least 51 percent low- and moderate-income residents
 - o Be at least 75 percent residential
 - Have no more than 50 percent exempt properties
- State roads are not eligible.

Acquisition costs

If your project includes costs for property or related services (legal fees, surveys, appraisals, etc.), include those costs under the main public facilities activity in your budget.

Sufficiency rating data guide for street projects

Very good (PSR 4.1–5.0)

Pavement looks smooth with no cracks or patches. It was likely built, rebuilt, or resurfaced within the last one or two years. No maintenance is needed.

Good (PSR 3.1-4.0)

Pavement gives a smooth ride but shows early signs of wear. Flexible pavement may have light rutting, random cracks, or slight raveling. Rigid pavement may show small cracks, minor joint spalling, or light scaling. These streets need minor to normal maintenance.

Fair (PSR 2.1–3.0)

Pavement ride is noticeably rough and may be barely tolerable at high speeds. Flexible pavement may show moderate rutting, map cracking, raveling, and patching. Rigid pavement may show joint spalling, faulting, heavier cracking, and frequent patching. Maintenance has been moderate to heavy.

Poor (PSR 0.0–2.0)

Pavement is in bad condition. Driving comfort is poor, and traffic slows down. Flexible pavement may have severe rutting, cracking, patching, and raveling. Rigid pavement may show severe scaling, spalling, pumping, faulting, cracking, and patching. Extensive maintenance has not kept the surface acceptable. Resurfacing or full reconstruction may be needed.

| Note: Unpaved streets are eligible for LCDBG improvements. If they are inside the target area, they must be paved. |
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