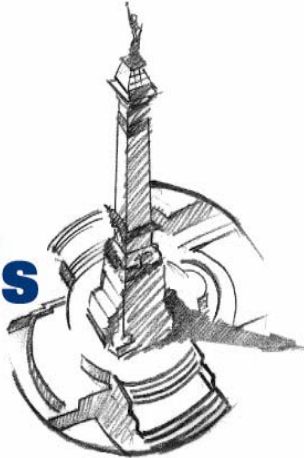


City of
Indianapolis

Gregory A. Ballard, Mayor



THE CDBG-R SUBSTANTIAL AMENDMENT

<p>Jurisdiction: City of Indianapolis</p> <p>Lead Agency: Department of Metropolitan Development</p> <p>Jurisdiction Web Address: http://www.indy.gov/eGov/City/DMD/Community/Pages/home.aspx</p>	<p>CDBG-R Contact Person: Chelsea Ernsberger</p> <p>Address: 200 E Washington St, Indianapolis, IN 46204</p> <p>Telephone: (317) 327-5806</p> <p>Fax: (317) 327-5908</p> <p>Email: cernsber@indygov.org</p>
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CDBG-R SUBSTANTIAL AMENDMENT TO THE 2009 ANNUAL ACTION PLAN

The City of Indianapolis is utilizing the opportunity afforded it through the American Recovery and Reinvestment Act to address the most urgent economic needs present in its community. In the nation's current economic state, unemployment and abandoned/vacant properties are increasingly plaguing the city's neighborhoods already in economic decline. The City plans to use its stimulus funds to address unemployment, criminal recidivism, brownfield contamination, vacant and abandoned properties, and energy efficiency concerns.

In accordance with the intent and purpose of the stimulus funds, our Brownfields Redevelopment Program is partnering with the Community Development Block Grant Program in conducting large scale contaminated and blighted property clean-up, remediation, and redevelopment. The properties we will remediate and assist in redevelopment foster criminal activity and further property decay, and in some instances devalue whole neighborhoods. The surrounding communities have acknowledged the areas as barriers to their economic success, but do not have the funds

to initiate appropriate solutions. It is in collaboration with these community partners that the City will implement its plans for revitalization.

In addition to reviving the neighborhoods' property values, the remediated and redeveloped properties will also bring new job opportunities to local residents, help retain existing area businesses, and involve energy efficiency building and rehabilitation practices.

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

Jurisdiction/Grantee Name: Indianapolis, Indiana		CDBG-R Formula Grant Amount: \$2,575,447				Date: 6.03.09	
Activity Name	Activity Description	Eligibility (Regulatory or HCDA Citation)	National Objective Citation	CDBG-R Project Budget (\$)	Additional Recovery Funds (\$)	Other Leveraged Funding (\$)	Total Activity Budget
Demolition	Removal of 200 abandoned structures in disrepair that pose a danger to the community.	570.201(d) - 04	Slum/Blight Area 570.208(b)(1)	\$695,371	-	\$1,500,000	\$2,195,371
Brownfields Assessment and Remediation	Toxic Materials Remediation of contaminated properties for the purpose of immediate job retention and additional permanent job creation.	570.201(d) - 04A	Low-Moderate Area Benefit; 570.208(a)(1)(vii); 570.208(d)(5)(i)	\$622,532	-	\$6,700,000	\$7,322,532
Acquisition	Building/Land acquisition with the purpose of redevelopment which will allow for new job creation.	570.203(a) - 17A/17C	Low-Moderate Area Benefit; 570.208(a)(1)(vii); 570.208(d)(5)(i)	\$1,100,000	-	\$1,000,000	\$2,000,000
Administration	All activities included in administering and implementation Indianapolis' recovery funds.	570.206 - 21A	None	\$157,545	-	-	\$157,545
Total				\$2,575,448	-	\$12,900,000	\$15,475,448

B. CDBG-R INFORMATION BY ACTIVITY

The City of Indianapolis proposes assisting the following projects as part of its effort to address unemployment and economic development:

- Demolition
- Brownfields Assessment and Remediation
- Acquisition

Activity Name: Demolition

1) Eligibility and National Objective Citation:

- 570.201(d) - 04
- Slum-Blight Area; 570.208(b)(1)
- Reducing the number of contaminated sites
- Short-term job creation
- Addresses the increase in vacant and abandoned properties

2) Total Budget: \$695,371

3) Activity Narrative: The City has established that there are more than 7,000 vacant, abandoned structures in Indianapolis. Many of these structures are in disrepair, meet the unsafe building criteria and are in need of demolition. Due to the recession and the large amount of foreclosures, many of our neighborhoods are experiencing disinvestment and blight. This impacts home values, public safety and overall health of the neighborhood. In an effort to stabilize these neighborhoods and address blight, the City will use \$695,371 to demolish 200 blighted structures throughout Marion County. The abandoned buildings problem in Indianapolis has become so widespread that the Department of Metropolitan Development recently created a separate Abandoned Buildings Section. The main focus of this section will be the elimination of unsafe sites that pose a threat to public health and safety issues, drive down the value of homes and decrease stability of our neighborhoods. The City went through an extensive process to address need as part of our Neighborhood Stabilization Program. Through this process, demolition was found to be a huge need.

4) Jobs Created: Demolition may create 50-100 temporary deconstruction jobs, with the potential of creating over 100 long-term jobs with the new development.

5) Additional Activity Information: Currently the City is researching environmentally friendly deconstruction. If employed, this strategy will encourage green deconstruction on all future demolition projects. There is no precedent at this time within community and economic development in the City of Indianapolis.

- 6) Responsible Organization: City of Indianapolis; Department of Metropolitan Development; Chelsea Ernsberger; Grant Manager; 200 East Washington Street; cernsber@indygov.org

Activity Name: Brownfield Assessment and Remediation

- 1) Eligibility and National Objective Citation:
- 570.201(d) – 04A
 - Low-Moderate Area Benefit; 570.208(a)(1)(vii)/570.208(d)(5)(i)
 - Reducing toxic contamination in the community's neighborhoods
 - Long-term job creation as remediated locations are redeveloped
 - Reduces the number of vacant, abandoned and unsafe properties
- 2) Total Budget: \$622,532
- 3) Activity Narrative: The City of Indianapolis Department of Metropolitan Development (DMD) through its Brownfield Redevelopment Program has leveraged approximately \$9,000,000 in federal, state, and local funding resources towards brownfield redevelopment over the past five years. These funds have resulted in creation of hundreds of jobs, improvement of environmental health and economic development and significant investment in the weakest market areas of the City. One project alone has helped leverage over \$32M in the area of the highest density of brownfield sites in the City setting the stage for multiple additional projects that are in progress. The City of Indianapolis has received national recognition for achievements in area-wide brownfield assessment and area-wide redevelopment projects as well as large scale site specific brownfield redevelopment projects conducted at the speed of business.

Recently, the City of Indianapolis has begun a HUD and EPA grant funded brownfield inventory project encompassing the entire 403 miles of the consolidated City of Indianapolis and Marion County, Indiana. This project identified approximately 1800 brownfield sites of concern. Additionally, this project has assisted the City in prioritizing several large scale brownfield projects that are ready for redevelopment except for need of acquisition, demolition, assessment, and/or remediation funds. Recognizing a number of these sites are poised for immediate redevelopment, the State of Indiana through its Indiana Finance Authority has forwarded up to \$6.7M of the city's requests for federal brownfield cleanup funding assistance to the US Environmental Protection Agency. If awarded, these funds will be leveraged along with the HUD CDBG-R funds to make large-scale economic development impacts as well as blight reduction and improvement of human health and the environment in the weak market areas throughout Indianapolis.

Currently, the identified brownfield sites attract criminal activity, limit business and residential growth, and decrease nearby property values. The Brownfield's Program has identified the connection between deteriorating neighborhoods and brownfield

sites; however, it has limited resources and has only been able to address a small portion of its targeted projects.

- 4) **Jobs Created:** Activity will create 50-70 temporary environmental deconstruction and remediation jobs as well as help retain 250 permanent jobs.
- 5) **Additional Activity Information:** Through acquisition, assessment, remediation and redevelopment of brownfield sites, the City of Indianapolis will reduce pressures of urban sprawl and increase redevelopment of urban core neighborhoods. The City of Indianapolis recognizes the benefits of smart growth redevelopment and is exploring concentrated redevelopment efforts in a Smart Growth Redevelopment District approach that will promote implementation of green building technologies, renewable energy market exploration, and exploration of urban and sustainable agriculture in the weakest market areas. Many of these weak market areas also tend to have the highest concentration of brownfield sites. Implementing sustainable practices in brownfield redevelopment of these areas including consideration of deconstruction and waste audit / environmental oversight on demolition of brownfield sites will further increase the overall environmental benefit of these brownfield redevelopment projects. The City of Indianapolis has created and employed an innovated system of waste auditing and environmental oversight on prior large scale brownfield redevelopment demolition projects. This process will be initiated in additional projects in the scope of CDBG-R projects where appropriate for both cost savings and reduction of environmental impact with consideration to the carbon footprint of each demolition project.
- 6) **Responsible Organization:** City of Indianapolis; Department of Metropolitan Development; Chelsea Ernsberger; Grant Manager; 200 East Washington Street; cernsber@indygov.org

Activity Name: Acquisition

- 1) **Eligibility and National Objective Citation:**
 - 570.203(a) – 17A/17C
 - Low-Moderate Area Benefit; 570.208(a)(1)(vii)/570.208(d)(5)(i)
 - Energy efficiency retrofitting and rehabilitation on acquired sites
 - Long-term job creation and retention as locations are redeveloped
- 2) **Total Budget:** \$1,100,000
- 3) **Activity Narrative:** Due to previously existing companies leaving urban neighborhoods, there are several deteriorating and vacant buildings around the City causing entire blocks of blight and decay. These sites are often located within and near low income areas, weak market neighborhoods and contribute to a cycle of downward pressure on redevelopment efforts in the area in general. With the current economic conditions, private investment to remediate and rehabilitate these properties is difficult to find.

The City would like to use one million one hundred thousand of its CDBG-R funds to provide resources to community development groups as well as possible investors to make economic investments in those neighborhoods possible. In recent years of brownfield elimination, the city's Brownfield's Program has worked on over 50 sites requiring environmental assessment and remediation.

Securing interest in these real estate parcels through acquisition of sites previously used for commercial and industrial purposes and now left vacant or underutilized will allow the City to conduct more extensive remediation and development, with the intent of spurring economic development that will benefit low-moderate income persons in the neighborhood and improving the human health and environment around these sites. These funds could be leveraged with \$9,500,000 in private investment.

- 4) Jobs Created: The acquisition will open the opportunity for over 200 new positions.
- 5) Additional Activity Information: The City will assist in the acquisition of deteriorating commercial buildings, which will open up the opportunity for remediation, rehabilitation, and new construction that will improve the economic status of the surrounding low-moderate income neighborhoods. In addition, rehabilitation activities will include making two properties energy efficient, LEED certified buildings.
- 6) Responsible Organization: City of Indianapolis; Department of Metropolitan Development; Chelsea Ernsberger; Grant Manager; 200 East Washington Street; cernsber@indygov.org

Activity Name: Administration

- 1) Eligibility and National Objective Citation:
 - 570.206 – 21A
- 2) Total Budget: \$157,545
- 3) Activity Narrative: The city's administration of the CDBG-R funds will require at least \$157,545 and will include all costs associated with the planning and implementing of the city's activities plan.
- 4) Jobs Created: N/A
- 5) Additional Activity Information: All included activities will assist the City of Indianapolis in stimulating its economic conditions through increased and retained employment and through new economic development projects.

6) Responsible Organization: City of Indianapolis; Department of Metropolitan Development; Chelsea Ernsberger; Grant Manager; 200 East Washington Street; cernsber@indygov.org

C. PUBLIC COMMENT

The City of Indianapolis announced the public release of its CDBG-R substantial amendment in the Indianapolis Star newspaper on May 13, 2009. The amendment was posted on the city's website and made available at the City-County Building from May 22, 2009 to May 29, 2009.

Comment 1:

Combining ex-offender re-entry programs with the proposed job creation should be considered as a possible solution when addressing unemployment and abandoned buildings.

RE: In put for spending Economic Development Stimulus Funds

Looking at two issues that threaten public safety – the abandoned housing issue and the reintegration of ex-offenders back into the communities, we have a chance to address both issues within the same plan.

In bringing together a major public safety concern for the City, the abandoned housing issue, and the need for work re-release and community corrections centers to find employment for their residents – We have an opportunity to find a solution in at least two areas. Most people agree that finding available/affordable housing is a major barrier to successful re-entry. In Indianapolis and other urban areas of Indiana there are limited options for transitional and permanent housing for ex-offenders. Shelters should be viewed as the least favorable option for persons recently released, Because of their temporary and unstable environment. Also, zoning laws that prohibit individuals with felony records to rent or even live in those areas, create difficulties for ex-offenders trying to find a place to live. Especially, if family members live in these restricted areas. The “not in my neighborhood” mentality makes housing an ex-offender a more complex scenario. It is not always the community residents that oppose housing ex-offenders in their neighborhoods. There are communities that are willing to allow housing for returning prisoners; yet, local political leaders and council members sometime oppose such efforts. Other housing issues include a general reluctance on the part of landlords to rent to ex-offenders, and complex family relationships. Although returning prisoners may be able to live with family members upon release, many such situations become stressful quickly, sometime leading to an environment where successful reintegration is difficult.

The City has an economic and public safety reasons for looking into its re-entry policy together with the abandoned housing initiative. The number of houses that the City has control over and the responsibility for their up-keep, the City would do well to tap into the community corrections for help to care for these properties that are a hazard to public safety. The City could also contract with community and union organizations that provide training to the Special Needs Population in the field of home-improvement, and rehabilitation of abandoned houses..

Helping to remove some of the barriers that ex-offenders face, we would:

- a. Help ex-offenders develop skills vital to gaining and maintaining employment.
- b. Create necessary work experience.
- c. Help change the public's perception of the ex-offender.
- d. Make ready houses that could serve as transitional housing for the ex-offender.
- e. Boost the ex-offender's self-image.

For years the City has talked about tackling the problem of vacant and abandoned houses in Indianapolis; in a press release, June 25 2008, Deputy Mayor of neighborhoods Olga Williams said: "Addressing abandoned housing is one of the most significant ways to strengthen our neighborhoods." He went on to say "Our goal is to take these properties and promote redevelopment so they can become a positive part of the community instead of a threat to public safety." Looking at the amount of money the City is spending on this problem (\$1,040,406 in 2008) and they are having a hard time keeping up with the demand. There were 105 demolition cases that have been carried over from 2008 due to a lack of funding. The City can't do all this alone-and it shouldn't have to! "WE", the community have the need, the manpower and most importantly the skills to see that this abandoned housing initiative gets done. All of us have to be on the SAME PAGE using our collective skills and talents to combat a grave public safety issue. The plan that will emerge from our collaborative effort will help tackle the re-entry initiative, the abandoned housing issue and save the taxpayers millions of dollars! The money to get started is there.

What is needed is a strategy that will bring about a partnership between community-based and union organizations that already train people in skills related to the rehabilitation and the construction houses and buildings. After that- there is a component of the plan that will help community organizations whose mission is to provide recovery-transitional and ownership housing programs to their clients. Our plan will create jobs, make our neighborhoods safer, and provide our people with hope - also save the taxpayers and the City millions of dollars. The goals that the City mentioned in their 2009 Action Plan is to: 1) Increase the availability of safe, decent, and affordable housing. 2) Prevent homelessness for special needs population and persons at-risk of homelessness- (*I think that this is addressing the ex-offenders also*)

What I hope this Economic Development Stimulus Fund will help address is the need to fund those community groups that are helping the "Special Needs Population." Tie the abandoned housing initiative with the re-entry initiative and let's see how much ground we will be able to cover. If we look at the relationship that the City of Charlestown, IN has with the Henryville Correction Facility, to use their inmates to supplement the city's work force, we would see the benefits that can be had. (see memo of understanding)

We all need to come together to establish a strategy that will make this plan a work for the City of Indianapolis- Can we all be on The Same Page? Can we make this project work for the City of Indianapolis?

Response 1:

When possible, the City remains open to and will actively engage in working with ex-offender employment training programs in demolition, deconstruction, rehabilitation, and construction.

Comment 2:

Citizen would like to see the City spend its CDBG stimulus funds on disabled/pedestrian access.

I am writing to request consideration for spending Stimulus Funds for needed infrastructure improvements on Michigan Road, specifically development of the Michigan Road Multi-purpose Path (part of the Michigan Road Corridor Plan adopted by the City's DMD). The Multi-purpose Path is an alternative to sidewalks and is delineated

in the Corridor Plan. I refer to this as “establishing safe and appropriate disabled/pedestrian access on Michigan Road.”

I have been leading an effort for the Crooked Creek Northwest Community Development Corporation in obtaining attention and support in establishing safe and appropriate disabled/pedestrian access on Michigan Road (since there are no sidewalks). We have been advocating the establishment of safe and appropriate disabled/pedestrian access on Michigan Road to the City of Indianapolis for some time. We understand that this critically needed infrastructure improvement has not been included among the Stimulus Projects put forward by the City to the State and Federal government. The CDC Board of Directors unanimously supports funding of this needed improvement through any available funding source, including the Stimulus Program.

The Michigan Road Corridor is home to numerous St. Vincent Hospital supported group homes and disabled facilities, including Pauley Pavilion and Crooked Creek Towers, all of which house a large disabled community. In order to meet their shopping, medical, social service and personal needs, these individual members of our disabled community must transport themselves in wheelchairs in the traffic right-of-way. They face the daunting task of traversing one of the busiest thoroughfares in Indianapolis. Due to a lack of disabled/pedestrian access they have no other option but to travel in the street. Youth, bus riders and motorists are all exposed to increased risk due to the lack of this needed infrastructure.

Among the CDC’s activities, we continue to partner with St. Vincent Hospital in converting existing vacant housing into group homes for our disabled residents. These efforts have been supported by the City of Indianapolis, yet needed infrastructure in limiting the quality of life of the disabled and able alike that access Michigan Road.

As a neighborhood activist I have advocated for the establishment of safe and appropriate disabled/pedestrian access on Michigan Road for over 15 years through various City sponsored or community driven planning processes, including the Michigan Road Corridor Plan and most recently through the Crooked Creek Northwest CDC and its Great Indy Neighborhood Initiative (GINI). These efforts have demonstrated strong community support for the goal of providing safe and appropriate disabled/pedestrian access along Michigan Road, but no solutions. The City’s DPW and DMD directors have expressed support for this goal, but there is no funding to address this issue in the holistic fashion needed. Therefore, the CDC requests that Stimulus funding be made available to address this long ignored issue.

We understand that Stimulus funding is being considered to extend the “Cultural Trail” in Indianapolis. We recognize the benefits of this effort, but we believe that pressing safety and quality of life issues on Michigan Road are more critical and urgent than extending the Cultural Trail, which was to be funded through philanthropic efforts and not by public funds. This greatly concerns us at the CDC since lives are at risk on Michigan Road everyday as disabled individuals transport themselves by wheelchair in the traffic right-of-way. In addition to the risk that the disabled take to meet their daily needs, pedestrians, including children, who venture on foot to the various businesses on Michigan Road share this risk. Motorist risk hitting wheelchair bound individuals scurry across, up and down Michigan Road.

Area City-County Councilors and Congressman Carson support disabled/pedestrian access along Michigan Road. I believe that when you become aware of this critical need, that you will also support this critically needed infrastructure improvement. This urgent need IS critical. If not now, when? How? The Stimulus offers an opportunity to address this long overlooked infrastructure need!

I look forward to hearing from you concerning this important matter. It is a critical need that, once met, will serve the entire community and most notably -- the least able among us! Thank you in advance for your consideration.

Response 2:

Disabled/pedestrian accessibility is both a public safety and public works concern and will continue to be a priority to the Department of Metropolitan Development. At this time, the City is not ready to implement a plan to create further accessibility with the CDBG-R funds.

Comment 3:

Citizen would like to see rental rehabilitation with energy efficient improvements as a CDBG-R activity.

I am writing to comment on the draft allocation plan for stimulus funds administered by the City of Indianapolis. I noticed that the eligible activities do not include rental rehabilitation or energy efficient improvements. With the recent infusion of NSP funds for the City of Indianapolis to address foreclosed homes and vacant properties along with ongoing initiatives to address owner occupied rehabilitation using existing CDBG allocations, I would encourage you to expand the list of eligible activities to include rental rehabilitation, especially rental rehabilitation that is directed to special needs properties, and energy efficient improvements (e.g. retrofits of low flow fixtures, energy efficient lighting, energy star rated appliances, geo thermal heating, etc.).

Thank you for the opportunity to comment.

Response 3:

The Department of Metropolitan Development considers rental rehabilitation with energy efficient practices an important community and economic development activity and allots a portion of its annual CDBG entitlement funds to this activity. The City will use the CDBG-R funds to first clean up contaminated and dilapidated properties before assisting with any rehabilitation or redevelopment. It is too soon in the planning process to know exactly how the selected properties will be redeveloped or rehabilitated.

Comment 4:

Citizens are concerned about how minority and women business enterprises will be incorporated into the current CDBG-R activities.

I am writing on behalf of the members of the Indiana Democratic African American Caucus (IDAAC) as well as citizens of Indianapolis who share our concerns for how the American Recovery and Reinvestment Act (ARRA) and other taxpayer dollars will be utilized in our City.

- IDAAC encourages the utilization of minority and women owned business enterprises certified as such by the City of Indianapolis in the awarding of contracts utilizing federal funds, and not limited but including funds from the ARRA.
- IDAAC encourages the use of Public Labor Agreement (PLA) standards as it pertains to prevailing wages, fringe benefits and workforce utilization and other relevant PLA provisions for protection of labor rights.
- IDAAC supports the employment of ex-offenders and furthermore suggests that a goal is set and monitored for compliance in the employment and utilization of ex-offenders and aforementioned economically empowering initiatives already in use by the City.

Consistent with the ARRA we ask that the City inform the public as to how it will comply with the provisions of transparency and accountability in the spending of public funds. To date we are concerned about the lack of information available on your website <http://www.indy.gov/eGov/Mayor/Pages/IndyStimulusInfo.aspx>. When will these funds reach the City? It is not clear how these funds are being spent and how they are creating jobs.

We are aware of the recipients of the first round of funding for the Neighborhood Stabilization Grants. We are interested in learning about the Minority and Women Business Enterprise participation on the development groups. It appears that no Minority or Women owned enterprises will be leading development efforts. This is a problem. How will the City address the lack of diversity in the next round of funding?

I look forward to your response.

Response 4:

Minority or Women Business Enterprises will be seriously considered as possible partners when bidding projects for the proposed activities.

Comment 5:

Citizen would like to see the city's proposal also address retrofitting multi-housing units to be more energy efficient and environmentally friendly.

Subject: CDBG-R Amendment

I am responding to the invitation for public comment to the proposed CDBG Recovery Amendment. My interest in the amendment evolves primarily from my board activities with a local nonprofit development corporation which provides housing and support services to our city's homeless with special needs.

We see within CDBG-R Activity 4 an exciting and beneficial opportunity for organizations such as ours. In our case, we own and manage eleven properties with some 500 units of buildings with an average age of about eighty years or so. Though all the buildings are in very good condition, there is a substantial opportunity to create energy efficiencies that take advantage of updated building materials and modern solutions readily available in the building industry, but as the narrative states, not generally possible through private investment. Retrofitting our properties with such technology would both improve the general environment for our residents and serve to reduce operating costs and energy consumption permanently. We would look forward to applying for a grant if this is within the purview of the activity.

Response 5:

Retrofitting and rehabilitating multi-family housing units is an activity the City regularly funds through its annual CDBG entitlement grant. The funding for this kind of rehabilitation is very limited, but may become less limited in the future as the community makes retrofitting for energy efficiency a priority.

Comment 6:

Preservation as well as retrofitting for energy efficiency should be considered high priorities in the proposal's owner-occupied repair and demolition activities.

I have been involved in community re-development and revitalization activities for over 20 years. I am familiar with many of the challenges facing our urban neighborhoods as I have been a homeowner and business owner in Center Township since 1986.

In addition, as a volunteer for the National Trust for Historic Preservation as well as Historic Landmarks Foundation of Indiana, Inc. I am actively involved with community revitalization efforts both locally and nationally. As one of the two Board of Advisor members in Indiana to the Trust, I have had the pleasure of working with other very talented individuals in this area.

Specifically as it relates to City's CDBG-R amendment w.r.t. proposed Activity 1 and Activity 2, I would like to submit a copy of the following for your consideration. In addition to the concept that the "greenest" home is one that is already built, we recognize the need to retrofit and upgrade many of our older homes and buildings. The attached Op-Ed from Richard Moe, President of the National Trust is offered in support of repairing versus demolishing existing buildings. In addition to being "greener" from the standpoint of creating sustainable and affordable neighborhoods, the lowest cost home is often one that already exists.

Historic preservation can – and should – be an important component of any effort to promote sustainable development. The conservation and improvement of our existing built resources, including re-use of historic and older buildings, greening the existing building stock, and reinvestment in older and historic communities, is crucial to combating climate change.

There are clearly times when rehab and repair are not realistic for a given structure. Often times decay is beyond the level of total repair, however, the Trust has developed a policy statement regarding Demolition vs. Deconstruction. We have also recently established an environmental study environment with the creation of "Preservation

Green Lab” in Seattle Washington that is determined to conduct the necessary research into ideas like “embodied energy”, energy efficiency of “old growth” timber/wood windows as well as the many other aspects of achieving sustainable economic housing models.

In support of the “deconstruction” option, I would be very interested in assisting the City in its efforts to achieve some level of Green Jobs creation through the proper use/training for deconstruction jobs. I have access to several resources within the Trust that are in support of these initiatives and I look forward to assisting you in whatever manner would be appropriate. Please accept the following weblinks as additional information

Response 6:

Though the City is not ready to bid jobs at the time this plan is being submitted, it is excited about opportunities to use new greening techniques such as deconstruction. Using this practice in the place of demolition may require more time and effort than is available with the recovery funds, but the City would like continued encouragement and support from the community regarding this activity whether or not it is possible to initiate now.

Comment 7:

The following community partner would like to see some of the city’s recovery funds allocated to the façade improvement program.

IDI supports the City's efforts to spend economic development stimulus funds. Specifically, we request increased façade improvement grant dollars that can be used to add jobs and maximize private sector investment.

Response 7:

The façade program is funded annually through the city’s entitlement CDBG grant and is distributed through the Local Initiative Support Corporation. The program just celebrated is continued success as it began its 200th façade improvement. At this time, there is no proposed activity included in the CDBG-R funds for façade improvement as it is not as much of a priority as the actual proposed activities.

Comment 8:

Indianapolis’ CDBG-R funds should be spent on improving pedestrian walkways.

I'd like to see a large part of the money invested in fixing sidewalks. I know there is already a project in place for this, but seems to be it could be widely expanded. I live along E. New York St- just outside of downtown, and there are places where people actually walk in the street because the sidewalks are so bad.

Secondly, I'd like to see streets and alleys that in some cases are the only access to driveways improved. I've got to replace my tires this year because my alley is SO bad.

Response 8:

While the Department of Metropolitan Development supports increasing neighborhood walkability, the funds are currently being allocated toward major vacant and abandoned property clean-up. Neighborhood walkability projects increase a community's livability and safety and are a high priority for the City.

Comment 9:

The funds should be spent on development in areas experiencing economic decline on the city's west side.

I would like to see some of this money used to spruce up some areas which have been popular in the past, but have declined due to deterioration & lack of attention, etc., such as the Lafayette Square area. If the areas along 38th St. and Lafayette Rd. were more attractive, I think the area would have a better chance of thriving. I don't know if road repairs would qualify for some of these funds, but that would also be good. But I just think some of these funds should be used to make some areas look more attractive, so people would be more interested and more likely to spend time in those areas. Flowers, shrubs, trees, etc. as well as maybe sculptures, play areas for children, etc., would all be welcome additions in the L.S. area, I think. Thank you.

Response 9:

The CDBG-R funds are in high demand and the City is allocating them to areas believed to be in the most need. The owner-occupied repair, demolition, brownfields assessment/remediation, and acquisition activities will assist in bringing economic development to neighborhoods and communities in great need.

Comment 10:

The citizen feels the money should be disbursed differently from the federal level than is currently planned.

The best thing we could do with this money is send it back...or just write checks directly to every tax paying person so they can spend the money that was stolen from them through this massive government boondoggle. If you really want to stimulate the economy, consider economic freedom rather than the enslavement that is going on today.

Response 10:

The City is not at liberty to make federal spending decisions, but hopes that the Indianapolis area is greatly improved in all aspects by its proposed activities.

Comment 11:

Areas in great need of development are those that have experienced recent economic decline on the city's east side.

To Whom It May Concern;

I would like to see money spent on the recovery of Washington Square Shopping Center. The roadways to the square have choked the business right out of it. Washington Street improvements were put on the backburner for over five years and this has taken its toll. Also Mitthoeffer going south was to be widened to four lanes and taken to State Road 52; it never happened. The east side has been neglected but it can be saved with spending. The Washington Street work has now started and hopefully Mitthoeffer will follow. We need this shopping center with anchor stores and proper roadways to it because we have great people with money here in Warren Township. The North and South sides are over developed making travel problems. The eastside needs to be targeted for development to high standards. Please consider the needs of the residence in this area.

Warren Township resident since 1965

Response 11:

The Department of Metropolitan hopes that its proposed CDBG-R funded activities will not only benefit the areas directly surrounding selected locations, but the City as a whole. All selected areas are those in what the City considers to be the greatest need.

CDBG-R Substantial Amendment Grantee Checklist

Contents of a CDBG-R Action Plan Substantial Amendment

<p>Jurisdiction: City of Indianapolis</p> <p>Lead Agency: Department of Metropolitan Development</p> <p>Jurisdiction Web Address: http://www.indy.gov/eGov/City/DMD/Community/Pages/home.aspx</p>	<p>CDBG-R Contact Person: Chelsea Ernsberger</p> <p>Address: 200 E Washington St, Indianapolis, IN 46204</p> <p>Telephone: (317) 327-5806</p> <p>Fax: (317) 327-5908</p> <p>Email: cernsber@indygov.org</p>
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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 **Page 3**

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: **June 4, 2009**

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

- amount of funds budgeted for each activity, including CDBG-R funds, any additional Recovery Funds used and total activity budget,
 Yes No Verification found on page(s) **Page 3**
- the Eligibility citation (eligibility regulatory cite or HCDA cite),
 Yes No Verification found on page(s) **Page 3**
- the CDBG national objective citation,
 Yes No Verification found on page(s) **Page 3**

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) **Pages 4-8**
- projected number of jobs created for each activity,
Yes No Verification found on page(s) **Pages 4-8**
- whether an activity will promote energy efficiency and conservation,
Yes No Verification found on page(s) **Pages 4-8**
- the name, location, and contact information for the entity that will carry out the activity,
Yes No Verification found on page(s) **Pages 4-8**
- evidence that no more than 10% of the grant amount will be spent on administration and planning,
Yes No Verification found on page (s) **Pages 3 & 8**
- evidence that no more than 15% of the grant amount will be spent on public services,
Yes No Verification found on page (s) **Pages 3 & 4-8**
- evidence that at least 70% of the grant amount will benefit persons of low and moderate income,
Yes No Verification found on page (s) **Pages 3 & 4-8**

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) **Page 9**

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

Yes No Verification found on page(s) **Pages 9-17**

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"/> |

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|--|---|-----------------------------|
| (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 checked="" type="checkbox"/> | No <input type="checkbox"/> |