

**Division of Water Infrastructure  
North Carolina Department of Environmental Quality**

**Proposed Priority Rating System Change for the Community Development Block Grant-  
Infrastructure (CDBG-I) Program**

**Draft for Public Review**

**May 2023**

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**Background**

The Community Development Block Grant - Infrastructure (CDBG-I) program is a federally funded community development program in the Department of Housing and Urban Development (HUD) designed to provide grant funds to non-entitlement communities (i.e., incorporated municipalities under 50,000 and counties under 200,000 in population) to carry out housing and community development activities.

The CDBG-I Program is designed to help communities create healthy living environments through financing public water and sewer infrastructure and to mitigate public and environmental health problems in areas where the percentage of low-to-moderate income (LMI) persons is at least 51 percent.

The Division of Water Infrastructure (Division) in the North Carolina Department of Environmental Quality (NCDEQ) administers the CDBG-I funding program. The State Water Infrastructure Authority (Authority) establishes the priorities for funding for the State.

All of the Division of Water Infrastructure's funding programs follow a similar Priority Rating System (PRS) consisting of four categories:

1. Category 1 – Project Purpose
2. Category 2 – Project Benefits
3. Category 3 – System Management
4. Category 4 – Affordability / Financial Situation

The current system of using the Priority Rating System across multiple funding programs administered by the Division provides a consistent and transparent methodology for prioritization that aligns with the Authority's Master Plan and with statutory requirements. The prioritization system supports applicants in their continued efforts toward long-term utility viability and resiliency.

**Proposed Changes to the Priority Rating System**

On April 19, 2023, the Authority approved recommended changes to the Priority Rating System for public review. The proposed changes to the PRS included providing high priority to PFOA and PFOS exceeding proposed Maximum Contaminant Levels and a combination of GenX, PFBS,

PFNA and PFHxS exceeding Hazard Index of 1.0 as announced by the U.S. Environmental Protection Agency on March 14, 2023.

The proposed Priority Rating System revises the project purpose benefit (line item 2.H.3) to include both drinking water and wastewater projects where a portion of the project addresses PFAS and provides two additional benefit line items for projects addressing specific contamination. Specifically, the proposed changed/new project benefit points are:

- Updated Line Item 2.H.3: Project addresses any PFAS compounds exceeding 10 ppt, will receive two (2) points.
- New Line Item 2.H.4: Project addresses PFOA and/or PFOS compounds exceeding proposed MCL of 4 ppt, will receive ten (10) points.
- New Line Item 2.H.5: Project addresses Hazard Index exceeding 1.0 for an individual or combination of GenX, PFBS, PFNA, PFHxS, will receive ten (10) points.

The proposed revised PRS for the CDBG-I program is attached below, with changes shown in **red font** in line items 2.H.3, 2.H.4, and 2.H.5. No other changes are proposed.

## DRAFT – 2023 PRIORITY RATING SYSTEM FOR ALL CDBG-I PROJECTS

**Instructions:** For each line item, mark “X” to claim the points for that line item. Be sure that your narrative includes justification for every line item claimed. At the end of each category, provide the total points claimed for each program in the subtotal row for that category. Then add the subtotals from each category and enter the Total of Points for All Categories in the last line. Note that some categories have a maximum allowed points that may be less than the total of individual line items.

Line Item #	Category 1 – Project Purpose (Points will be awarded for only one Project Purpose)	Claimed Yes/No	Points
1.A	Project will consolidate a nonviable drinking water or wastewater utility		15
1.B	Project will resolve failed or failing infrastructure issues		15
1.C	Project will rehabilitate or replace infrastructure, including by a regionalization project		10
1.C.1	Treatment units, pumps and/or pump stations to be rehabilitated or replaced are greater than 20 years old, <b>OR</b> lines, storage tanks, drinking water wells or intake structures to be rehabilitated or replaced are greater than 40 years old, <b>OR</b> lead service lines		5
1.D-1.E	Reserved for other programs		
1.F	Project will extend service for the following specific reasons:		
1.F.1	Extend water and/or sewer service to new low-income housing, or to an area where existing LMI homes are being rehabilitated, <b>OR</b>		15
1.F.2	Connect existing LMI homes to water and/or sewer service		10
1.G- 1. I	Reserved for other programs		
<b>Maximum points for Category 1 – Project Purpose</b>			15
<b>Subtotal claimed points for Category 1 – Project Purpose</b>			
Line Item #	Category 2 – Project Benefits	Claimed Yes/No	Points
2.A	Project provides a specific environmental or public health benefit		15
2.A.1	Project eliminates 20% or more failing septic systems, malfunctioning onsite wastewater systems, or private wells that are dry or contaminated.		5
2.B-2.C	Reserved for other programs		
2.D	Project addresses promulgated but not yet effective regulations		3
2.E	Project directly addresses enforcement documents		

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2.E.1	Project directly addresses an EPA Administrative Order for a local government applicant located in a Tier 1 county, or addresses an existing or pending SOC, or a DEQ Administrative Order, <b>OR</b>		5
2.E.2	Project directly resolves a Notice of Violation or Notice of Deficiency		3
<b>2.F</b>	Project includes system merger		10
<b>2.G</b>	Project addresses low pressure in a public water supply system		5
<b>2.H</b>	Project addresses contamination of a water supply source:		
2.H.1	Project addresses acute contamination of a water supply source, <b>OR</b>		15
2.H.2	Project addresses contamination of a water source other than acute (this includes 1-4 Dioxane and Manganese), <b>OR</b>		10
<del>2.H.3</del>	<del>Project addresses an emerging contaminant without an MCL</del>		<del>10</del>
2.H.3	Project addresses any PFAS compounds exceeding 10 ppt, <b>OR</b>		2
2.H.4	Project addresses PFOA and/or PFOS compounds exceeding proposed MCL of 4 ppt, <b>OR</b>		10
2.H.5	Project addresses Hazard Index exceeding 1.0 for an individual or combination of GenX, PFBS, PFNA, PFHxS		10
<b>2.I</b>	Reserved for other programs		
<b>2.J</b>	Water loss in system to be rehabilitated or replaced is 30% or greater		10
<b>2.K</b>	Project provides a public water system interconnection		
2.K.1	Project creates a new interconnection between systems not previously interconnected <b>OR</b>		5
2.K.2	Project creates an additional or larger interconnection between two systems already interconnected which allows one system's public health water needs to be met during an emergency		3
2.K.3	Reserved for other programs		
<b>2.L</b>	Water and sewer project is located within the same footprint		5
<b>2.M</b>	Project directly addresses a moratorium on a local government unit system		7
<b>2.N</b>	Project provides resiliency for critical system functions		
2.N.1	Project relocates infrastructure from inside the 100-year floodplain to outside the 500-year floodplain <b>OR</b>		8

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2.N.2	Project relocates infrastructure from inside the 100-year floodplain to outside the 100-year floodplain <b>OR</b>		5
2.N.3	Project relocates infrastructure from between the 100-year and 500-year floodplains to outside a 500-year floodplain, <b>OR</b>		3
2.N.4	Project fortifies or elevates infrastructure within floodplain, <b>OR</b>		4
2.N.5	Project improves ability to assure continued operation during flood events, <b>OR</b>		4
2.N.6	Project downsizes infrastructure related to buyouts, <b>OR</b>		4
2.N.7	Project provides redundancy/resiliency for critical treatment and/or transmission/distribution system functions including cybersecurity and/or backup electrical power source		3
2.O - 2.R	Reserved for other programs		
2.S	Project provides site work and new water/wastewater infrastructure, including house or apartment connections, to new low-to-moderate income housing		5
<b>Maximum points for Category 2 – Project Benefits</b>			<b>20</b>
<b>Subtotal claimed points for Category 2 – Project Benefits</b>			
<b>Line Item #</b>	<b>Category 3 – System Management</b>	<b>Claimed Yes/No</b>	<b>Points</b>
3.A	Capital Planning Activities		
3.A.1	Applicant has implemented an Asset Management Plan as of the date of application, <b>OR</b>		10
3.A.2	Applicant has a current Capital Improvement Plan (CIP) that spans at least 10 years and proposed project is included in the plan		3
3.B	System Operating Ratio is greater than or equal to 1.00 based on a current audit, or is less than 1.00 and unit cost is greater than 2.5% of MHI		5
3.C	Applicant has an approved Source Water Protection Plan and/or a Wellhead Protection Plan		5
3.D	Applicant has implemented a water loss reduction program		5
3.E	Reserved for other programs		
<b>Maximum points for Category 3 – System Management</b>			<b>15</b>
<b>Subtotal claimed points for Category 3 – System Management</b>			

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Line Item #	Category 4 – Financial Situation	Claimed Yes/No	Points
4.A	Reserved for other programs		
<b>4.B</b>	Current Monthly Combined Utility Rates at 5,000 Usage		
<b>4.B.1</b>	Greater than \$79 <b>OR</b>		4
<b>4.B.2</b>	Greater than \$90 <b>OR</b>		6
<b>4.B.3</b>	Greater than \$107 <b>OR</b>		8
<b>4.B.4</b>	Greater than \$129		10
<b>4.C - 4.D</b>	Reserved for other programs		
<b>4.E</b>	Poverty Rate		Calculation; Max 15 pts
<b>4.F</b>	Low-to-Moderate Income		Calculation; Max 25 pts
<b>Maximum points for Category 4 – Financial Situation</b>			<b>50</b>
<b>Subtotal claimed points for Category 4 – Financial Situation</b>			
<b>Total Points Claimed for All Categories</b>			