

Date: April 10, 2024

Title: 041024-507680-HUD-PRICE

Speaker 0 00:00:00 Good afternoon everyone. Thank you for your patience. This is the Preservation and Reinvestment Initiative for Community Enhancement Notice of Funding Opportunity, otherwise known as the PRICE NOFO webinar. My name is Jennifer Day. I'm from the Special Issues Team in the Office of Block Grant Assistance, and I'll be your MC for today's webinar. This is the fifth in a series of webinars covering HUD's PRICE NOFO. These webinars are intended for potential PRICE applicants and provide participants with an overview of PRICE and the application requirements. Today's webinar will provide a look at the HUD Environmental Review process in environmental review considerations for PRICE.

Speaker 0 00:00:42 Next slide, please. Today's agenda includes a quick look at the PRICE NOFO landing page, some grants.gov resources, and a review of upcoming webinars, followed by opening comments from HUD leadership, a presentation on the HUD Environmental Review process, environmental review considerations for PRICE and environmental review resources. We will leave time at the end for q and a. I will cover a few general housekeeping rules before we get started. All participants will be muted, so we ask that you submit all questions using the chat feature so that our presenters may be able to see the questions and respond. Please send your chat to all presenters to ensure that we are receiving questions throughout the event. Webinar materials will be posted to the PRICE page on HUD dot gov.

Speaker 0 00:01:35 Next slide, please. HUD has created a dedicated webpage for the PRICE competition. The PRICE NOFO landing page can be found on HUD dot gov and contains a link to the notice of funding opportunity, nofo related webinars and copies of the application materials. We highly encourage you to check this page regularly for updates. Next slide, please. We also want to remind folks that materials, instructions, and the application package are available through grants.gov. HUD does not manage grants.gov, so if you come across any challenges logging in or finding materials, please reach out to grants.gov directly. You can email support@grants.gov or call 800-518-4726. There are also resources on the website, including an FAQ page and a page specifically about error messages. Next slide.

Speaker 0 00:02:35 As I mentioned, this webinar is the fifth of eight webinars for PRICE. These webinars are all geared toward potential applicants. So we've got a couple announcements to make. We've rescheduled and reshuffled some of the upcoming webinars. So the most important one is next week. We moved from Wednesday, April 17th to Thursday, April 18th. It will still be at 3:00 PM and if you've already signed up for that webinar, you shouldn't have to sign up again. The links should stay the same. Um, additionally, oh, and then next week's presentation will be on Civil Rights and Fair Housing. Additionally, the eligibility, public participation and partnership considerations will be held on April 24th, and the Uniform Relocation Act will be on May 1st. Next slide.

Speaker 0 00:03:23 So now that we've discussed some of the PRICE resources, we're going to move on to introduce Director Fontenot for opening remarks. Kristen L. Fontenot currently serves as the US Department of Housing and Urban Developments Director for the Office of Environment and Energy. With nearly 20 years of experience, Ms. Fontenot has dedicated her career to navigating the complex environmental and historic preservation aspects of community development, disaster recovery, and resilience to ensure these processes improve outcomes and timely and efficient

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ways. In support of HUD's mission to ensure housing for all people nationwide, she's leading several of the department's efforts associated with the climate crisis intended to increase safety, comfort, and resilience of homes and community services across the nation. This includes recently releasing HUD's first radon contamination policy, significant work to decarbonize and improve energy use across the HUD portfolio and the active efforts to both final or to finalize both national requirements and guidance that will ultimately ensure resilience as a part of HUD investments from current and future flood risks. Through such efforts, HUD can ensure that the communities it serves are not left behind as the nation adapts to changing conditions. Prior to joining HUD, Ms. Fontenot worked at FEMA as the director of the Office of Environment and Historic Preservation, where she engaged regularly in the national and local discussions regarding environmental and cultural resource challenges associated with disaster preparedness, recovery and mitigation. Welcome, Director Fontenot.

Speaker 1 00:05:02 Jennifer, thank you. Just a quick note. Can you hear me okay?

Speaker 0 00:05:05 Yes.

Speaker 1 00:05:07 Excellent, excellent. I am so sorry everyone that you can't see me. I know my picture is up and I am super excited to be here. We had some tech technology challenges, uh, so, um, I'm on my phone, but hopefully all of you can hear me well, and I'm so, so excited to be with you all this afternoon. I know we are right dab in the middle of an incredible list of really important webinars specific to the PRICE program and the opportunities ahead of us. And I am really excited that we have the opportunity to spend some time together talking about environmental issues and opportunities as you all think about potential funding and the advancement of this particular program in your communities. You know, when this program came online and we started talking about it, I was really, really excited about it and really excited about it because of all the reasons that you are joining us today and have been joining us through this entire webinar series.

Speaker 1 00:06:14 Certainly the idea and the thought and the consideration of the environment becomes really important when we start making some of these critical decisions to advance housing availability and affordability across the country. And so very early on, as PRICE was being designed and thought through, I was very early raising some of the very issues and concerns and opportunities that you all will start hearing about today from many folks on the HUD Environmental team. Over the course of the next hour or so, during the time with all of you, you will hear from three incredible individuals on our team who have a tremendous amount of experience in some of the areas that I think are really most important when we think about the environment and the resources and the opportunities that present themselves under PRICE. They will be able to give you a lot of very specific nuts and bolts, information about how to think about potential applications and opportunities with the funding that is available.

Speaker 1 00:07:27 So, manufactured housing and manufactured housing units are a unique subset, as we all know of, um, our attempt to, to continue to improve housing availability across the nation when we think about what we do. You know, one of the things I constantly remind folks is that the environmental compliance work is not an administrative hoop to jump through. It may have a lot of requirements that are laid out in systems such as our online, uh, environmental review system, which we call HEROS or in documents and guidance. And I know that sometimes that is a lot to, to navigate through, but at the end of the day, the ultimate why behind all of it is that the individuals

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we serve, individual people living in individual units, as well as communities at large, rely on us to ensure that the, that the decisions we make are not putting them into unnecessary, unnecessary harm.

Speaker 1 00:08:37 And that really becomes the crux of environmental compliance and the why we do what we do and the why so many of these laws and requirements were created in the first place and now must be adhered by when federal funding and resources are utilized to advance a whole host of priorities across the nation. So you're going to hear about some of the things that are really important to me throughout this webinar. And as we think about the placement, the smart placement of manufactured housing, big picture, uh, I think a lot about resilience and I think a lot about the changing conditions that we across this nation face. We know over the last decade, a tremendous number of catastrophic flooding events have occurred as well as really significant wildfires, riverine, flooding, you name it. And so when we think about resilience, we think about the lifespan of the investment and what that investment is used for.

Speaker 1 00:09:40 In this case, housing. So being sure we're thinking smartly about our placement and the decisions and the design that go along with that investment, uh, and, and that opportunity to improve housing. In addition, we know that the communities we serve, we have to spend special time really thinking about environmental justice and injustice. And the placements, of course, and the assurance that we are thinking through what those climactic, um, and changing condition risks are, becomes really important. We know that the communities we serve have historically been in locations that may have higher environmental risks, as well as individuals that are facing hardship when that disaster event happens to them. And so that's the big picture why then you get into the specifics and what you're going to hear about are two areas that I think really come into focus when you think about resilience, changing conditions, and that environmental justice lens that really is all of our responsibility.

Speaker 1 00:10:53 One of those is the flood plain and thinking through the placement of housing against what its current risk is today to flooding and what its future risk is. We know that individuals stay in houses for X number of years, and so it is our responsibility to make sure we are thinking about that placement smartly. And that will be a really important piece in the environmental compliance review when you think about the funding under PRICE and how we design to handle that flooding. The other piece is contamination. So we know that it is very common that soils all over the nation have been contaminated by prior youth, and that the placement of housing demands, housing the safety and the remediation of that land to prevent undue hardship or environmental inequity and injustice to those that may be living there once our work is done. And we've been able to fund the actions.

Speaker 1 00:11:59 So we will talk today with all of you about those two elements of environmental review in particular, because they really are key aspects that certainly we hear in the HUD Environmental Office have very much on our minds as we think about what success within PRICE looks like. So I have seen countless situations where these things have been thought through well, and I've also faced and met individuals who have lost everything because these were not thought through well. And so I'm really excited that we get the opportunity to be part of this webinar series early in PRICE. Um, as all of you consider this as a wonderful opportunity to advance housing in your communities, um, and to take this part into consideration because at the end of the day,

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safety is the thing that we know individuals rely on us for. And this is one of the really important ways that we make that happen. So Jennifer, I'm going to kick it back over to you, and thanks so much for having us and thanks everyone for joining us. This is great.

Speaker 0 00:13:06 Thank you, Director Fontenot, we appreciate you joining us today. Uh, next on the agenda, we have the team from the Office of Environment and Energy within HUD to discuss environmental review considerations for PRICE. Thank you OEE team for joining us today. And I'm going to hand it over to Omri Gross to start us off.

Speaker 2 00:13:23 Alright, thank you Jennifer and Kristin, and good afternoon everyone, and thank you for taking the time out of your day to attend this session. My name is Omri Gross, and I'm the program Environmental Clearance Officer for HUD's CPD programs, which includes the PRICE program. Um, next slide, please. I'm grateful to be joined today by our Director, Kristen, who you just heard from, and a couple of our subject matter experts out of headquarters. Glenn Schroeder is our contamination expert, and Dan Herrera is our floodplains and wetlands expert. And thank you both for taking the time out of your busy schedule to present this training with us. Next slide, please.

Speaker 2 00:14:06 Okay, so today our focus will be to provide some general information about HUD's Environmental Review process, as well as some specific considerations related to the environmental review process and PRICE. As Kristen mentioned, we will focus on covering a few of the environmental laws and considerations that could be more likely to impact manufactured homes such as Contamination Floodplain Management, community Resilience, and Environmental Justice. Finally, we'll wrap it up by providing links to key environmental review resources and a question and answer as time allows. Next slide, please. Okay. We'll get started by providing some general background about HUD's Environmental Review process. Next slide, please.

Speaker 2 00:14:56 An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it complies with federal, state, and local environmental standards. The environmental review process is required for all HUD assisted projects to ensure that the proposed project does not negatively impact the surrounding environment, and that the project itself will not have an adverse environmental or health effect on end users. Next slide, please. In addition to being required for HUD assisted projects, there are also many important benefits to the environmental review process. It ensures that the project will avoid or mitigate harm to people and or the environment. It protects the public investment going into the project and results in higher quality projects. And the environmental review process also increases transparency and trust with the public. Next slide, please.

Speaker 2 00:16:00 As noted, an environmental review is required for all HUD assisted projects, even for projects that only consist of exempt activities, which we'll talk a little bit more about soon. So, again, I'll repeat that. An environmental review is required for all HUD assisted projects, even for projects that only consist of exempt activities. This is a common misconception when the environmental review is not conducted properly or as non-compliant, it can result in project delays, additional or unexpected costs, cancellation and even repayment of funds. HUD funding programs and projects are routinely monitored for both programmatic and environmental requirements, which can result in findings, statutory violations, corrective actions, and in some cases even repayment of funds or prohibition of using HUD funds in the future for the same project. In rare

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circumstances where the violations are particularly egregious, there's also the possibility of civil and criminal penalties. Next slide please.

Speaker 2 00:17:16 Now, the regulations governing HUD's environmental review process are fairly unique compared to other federal agencies. HUD's regulation at 24 CFR Part 50 governs the environmental review process when HUD is the responsible party conducting the environmental review. Now, this is how most other federal agencies operate, where the federal agency conducts the environmental review. However, HUD also has regulations at 24 CFR, Part 58, excuse me, that governs the environmental review process when HUD has delegated authority to assume the responsibility of the environmental review to a unit of general local government, such as a city, county, or state. So again, the regulations under Part 50 govern the process when HUD completes the environmental review. And then the regulations under Part 58 governs the process when HUD has delegated that authority, that responsibility to complete the rev, the environmental Review to a unit of general local government. Now under Part 58, the unit of general local government in which the project is located, serves as the Responsible Entity responsible for conducting the environmental review.

Speaker 2 00:18:34 Now, most CPD community planning and development programs, um, are under Part 58 by default, where the local government conducts the environmental review. Uh, there are a few CPD community planning and development, uh, funding programs that are Part 50 by default, where HUD completes their environmental review. But PRICE is a hybrid program, so that meaning that if the recipient is a local government, the environmental review is conducted by that local government under art 58. But if the recipient is not a government, then the environmental review is conducted by HUD under Part 50. So again, if you are the recipient and you are a local government, you will be conducting the review, uh, as the Responsible Entity under Part 58. If you are not a local government and you are the recipient such as a nonprofit, um, then you'll have to reach out to HUD to request that HUD conducts the environmental review under Part 50. And then a couple of the other regulations here, Part 55 is the part of HUD's regulation that covers plains and wetlands, and part 51 covers HUD standards for noise, explosive inflammable hazards and runway clear zones. Next slide, please.

Speaker 2 00:19:56 Okay. Now we'll discuss the steps involved in HUD's environmental review process. Step one is defining the project, which is the most essential component to a successful environmental review. Next slide, please. The project description is the foundation of the environmental review. It's necessary for determining the level of review and scope of analysis. It's also serves to inform the public about the federally funded activity. Among other information, the project description should include a project timeline, the amount and sources of funds including non-HUD funds, and should list all related reasonably foreseeable project activities that are related based on geography functionality or that are logical components of the project. And I'll talk a little bit about, um, the basis for relation, uh, on the next slide. Um, but, but before that, uh, it's just important to note that an inaccurate or incomplete project description could result in an incorrect level of review, non-compliance with laws and authorities and or monitoring or office of inspector general findings. Next slide please.

Speaker 2 00:21:21 Listing all of the related project activities is what we refer to as project aggregation, which again, is a key part in developing the project description and the scope of the

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environmental review. Now, HUD's regulations at 24 CFR 58.32 provide some criteria for the basis for which activities should be considered related to the project. There are three bases for relation. There's a geographic basis, a functional basis, and a logical basis. The geographic basis for relation is essentially when you have different activities that are all happening on the same site. So this could be, you know, uh, building a parking lot acquisition, demolition, new construction, but they're all happening on the same site. Then they all have to be aggregated and included into the project scope, the project description, um, of the environmental review. So that's a geographic relationship. A functional relationship is when you have the same types of activities such as maybe a home repair program, um, that are being conducted in various different locations across various different locations, right?

Speaker 2 00:22:37 So, so whereas geographic is different activities on the same site, functional relationship would be the same activity, um, across different locations, right? So that would also, if you have a home repair program right, that, um, that you're doing across different locations as an example, um, then that would be a functional relationship and they would need to be aggregated. All those activities would need to be aggregated into the same review. And then of course, there's a logical, uh, basis for relation, um, which is essentially, if, you know, one activity is a logical component of the project, right? So for instance, if, if not for activity A, there would be no activity B, right? You know, if we didn't acquire the property right, then we wouldn't be able to, you know, redevelop it, right? So the acquisition would need to be included right now. So, so again, for example, if you were planning to acquire a property, then demolish it for new construction, you'd have to consider that the demo demolition and the construction could not happen without first acquiring the property. So you couldn't limit your review to just the demolition or construction, even though maybe that's where the funds are going to, right? You would still have to include the acquisition because you have to include all reasonably foreseeable related activities, um, based on geography functionality or logical relationship. Next slide please.

Speaker 2 00:23:57 Now, one of the most important HUD environmental regulations to keep in mind when embarking on a new project is the limitation on activities pending clearance found at 24 CFR 58.22, which is also referred to as the prohibition on choice limiting actions. You may have heard that term in the past, choice limiting actions. So HUD's regulations at 58.22 state that prior to the environmental review being completed, recipients nor their partners may undertake any activity that represents a choice limiting action or could result in environmental harm. Now, choice limiting actions are actions that limit the choice of reasonable project alternatives, or essentially lock the project into a specific location or activity. This could be acquisition, uh, ground disturbance, um, or even entering into a contract for physical work, right? All of those are examples of choice limiting actions, right? That essentially, you know, uh, lock you into a particular site because you either have a contract or you've started to do physical work on that site. Now, it's important to remember to communicate with stakeholders early in the process and to start the environment or view process as early as possible to avoid any choice limiting action violations. Taking choice, limiting actions prior to the completion of the environmental review process may result in a cancellation of the project sanctions repayment and disqualification for future funding of the same project. Next slide, please.

Speaker 2 00:25:45 Okay. So moving on. The next step in the environmental review process, after the aggregated project description has been fleshed out, the next step in the environmental review

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process is to determine the level of environmental review necessary for the project. So you develop the project description, and then based on the project description, you determine the level of review. Next slide, please.

Speaker 2 00:26:17 Now, there are different levels of review for HUD projects based on the scope of activities identified in the project description. That's why the project description is so essential, because it will inform what level of review you need to conduct for the project. The lowest levels of review are the exempt and CENST levels of review. CENST stands for categorically excluded, not subject to the laws and authorities at 58.5, and that's 24 CFR 58.5, which again, is the regulations that govern, um, the environmental review process, um, when a local government, um, is, is conducting the review. So exempt and CENST reviews. So again, if you, if you'll recall, all HUD assisted projects are required to complete an environmental review, even projects that only consist of exempt activities, right? So even if you only have exempt activities involved in your project, you still need to complete an environmental review.

Speaker 2 00:27:23 Now, exempt and CENST reviews generally include soft cost activities that do not involve physical work, such as admin costs, planning, supportive services, tenant-based rental assistance, and operating costs. Exempt and CENST reviews are subject to only three laws and authorities, which are listed at 24 CFR 58.6. And those laws and those three laws and authorities that exempt and CENST projects must comply with are flood insurance, coastal barrier resources, uh, and airport runway zones. Now for exempt and CENST level reviews. Once the environmental review determination is in place, grantees may then proceed with their project. Again, that's for exempt and CENST level reviews. All that needs to happen is for the environmental review to be completed, the environmental review determination to be in place, and then the project can proceed. No, uh, additional approvals from HUD are necessary. Now, CEST reviews, which is the next level up and stands for categorically excluded, but is subject to the laws and authorities at 58.5.

Speaker 2 00:28:53 These CEST reviews typically involve physical work such as rehab or reconstruction of existing buildings that meet very specific criteria. So we could be talking about anything from demolition to, you know, small scale construction of single family homes, and even acquisition or disposition of existing buildings, which will retain the same land use. Um, but again, these CEST level activities, they need to meet some pretty specific criteria such as, again, retaining the same land use. Um, there are certain limitations on how, uh, you know, how much the, uh, blueprint, um, and size can be increased. Um, and, and you can find all of that at, um, uh, 58.5 in the, uh, in the regulations. And, and then the next level up is the environmental assessment level of review. Um, and this is likely going to be the highest level of review that we will really see, um, for these PRICE, uh, activities.

Speaker 2 00:29:55 There is one higher level of review called the environmental impact statement. Um, but that's really for extremely large scale projects, like over 2,500 units or large scale infrastructure projects, right? So we're, we're likely not to see that level, um, of an environmental project out of this program. Um, but for the environmental assessment level, the EA level overview, um, those are required when the project does not meet any of the exam exemptions of either of the categorical exclusions, right? So we have exempt level review, categorically excluded, not subject to categorically excluded, subject to, and then if, if that the activities do not

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meet one of those criteria of, of the, uh, the levels of review before that, um, then they will, would default to being an environmental assessment level of review. These tend to be larger scale or more complex construction or groundbreaking projects such as multifamily developments.

Speaker 2 00:30:54 Um, and, and environmental assessment level reviews requires an additional analysis of the environmental assessment factors, um, as well as a publication called the environmental Finding called a Finding of No Significant Impact or a FONSI, which we'll talk about, uh, in a little bit here. Now, these higher levels of review, so the e the CEST categorically excluded, but is subject to the, the laws and authorities at 58.5 and the environmental assessment level of review, uh, have additional public notice and certification requirements associated with them that the exempt and CCE NST reviews do not have. So, as you recall, for exempt and CENST levels, levels of review, um, there's no HUD approval necessary. There's no public notice necessary, there's no Request for Release of Funds or approval from HUD necessary. Once the environmental review is complete for exempt and CENST, um, level of reviews, um, then the project can proceed essentially. Um, but with the CEST and the environmental assessment level of reviews, there's a public notice requirement, uh, a certification requirement, and then also the requirement to submit a Request for Release of Funds from HUD, um, which, uh, and, and get approval from HUD, which we'll, uh, talk about, uh, in the coming slides. Next slide, please.

Speaker 2 00:32:26 Okay, so here's a chart that shows which regulations must be addressed by each level of review. So you can see, right, that the exempt and CENST levels of review only need to comply with the three laws and authorities at 58.6, whereas the CEST and the EA levels overview need to not only comply with those three laws and authorities at 58.6, but also all of the rest of the laws and authorities at 58.5. And then the environmental assessment level overview also has an additional environmental assessment factors analysis associated with it. Um, and the environmental assessment factors is an additional analysis of effects to community services, facilities, and socioeconomic impacts, as well as climate consideration, um, which was recently added to those environmental assessment factors. Next slide, please.

Speaker 2 00:33:22 Okay. After determining the project description and the level of review, the next step in the process is to actually conduct the environmental review. Next slide. As we've discussed, depending on the project's level of review, which is based on the project scope and description, a HUD environmental review may consider a wide variety of environmental laws and authorities, including the National Environmental Policy Act (NEPA) um, endangered species, historic preservation, contamination floodplain management, and so on. The laws and authorities that ultimately need to be reviewed, again, is determined by the project scope and the level of the, the level of review. One law and authority that isn't listed here is environmental justice, which if required, must be analyzed last after identifying any compliance factors or mitigation, and we'll cover environmental justice in more detail later on. Next slide, please.

Speaker 2 00:34:35 So, this slide shows the three laws and authorities that must always be addressed regardless of level of review. Um, so you can see coastal barrier resources, airport, airport zones, and flood insurance. And so, again, even if your project only consists of exempt activities, it still needs to comply with three, these three laws and authorities. Next slide, please. Okay. So after conducting the environmental review and carrying out all necessary consultations, if the project's level of review rises to the CEST or EA level of review, and the review is being



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conducted by a local government under Part 58, then the review, then, then, then the Responsible Entity, that local government would move on to publishing the public notice and submitting a Request for Release of Funds to HUD. If the environmental review is being completed under Part 50 by HUD, there is no public notice or Request for Release of Funds process. Instead, HUD would just certify the environmental review and the project would then be able to proceed. Next slide, please.

Speaker 2 00:35:52 So let's talk about this step a little bit. Let's talk about this Request for Release of Funds process, um, which also involves a publication. So, again, this is required. This, this whole process is required only if your project rises to the CEST, um, or environmental assessment, EA level of review. If it's CENST or exempt, then this process does not apply. It's not necessary. And so the request, so the first step in this process is for the responsible, your local government Responsible Entity to finalize and approve the environmental review. Then the Responsible Entity would publish the appropriate public notice and wait the appropriate comment period. At the end of that comment period, the responsible, your local government Responsible Entity, responds to any public comments received, and then the Responsible Entity submits a Request for Release of Funds to HUD.

Speaker 2 00:37:00 And this is a form that's on the HUD Exchange. Um, you can search for it just by typing in request for lease of funds, uh, HUD Request for Release of Funds, uh, into Google. It should be the first hit. Um, and in you can get that form the Request for Release of Funds form. Um, but this is something that, that your res, your local government Responsible Entity, will be the one that actually fills out the form and submits it to HUD. Then once this is submitted to HUD, HUD will process that request for lease of funds. HUD will allow for a 15 day objection period, um, for any objections from, from the public or other agencies to come in. And now, if HUD receives objections, um, HUD will consult with the Responsible Entity to resolve those. Um, and then finally, uh, after the 15 day objection period, uh, if there are no objections or if all objections have been resolved, then HUD will approve or disapprove the Request for Release of Funds. If approved, HUD will issue an authorization to use grant funds, and they'll issue that to the Responsible Entity, the local government Responsible Entity. After receiving the authorization to use grant funds, the project may proceed. Next slide, please.

Speaker 2 00:38:25 Next slide, please.

Speaker 2 00:38:35 Can we forward the slide, please, Adrian? Thank you. Um, after the environmental review and the request for Elisa funds process has been completed and the project has received all necessary approvals from HUD, the last step is to implement the project and any mitigation prescribed by the environmental review. The grantee is responsible for carrying out any mitigation required. So in the process of conducting the environmental review, your local government or HUD, depending on who's conducting the environmental review, may prescribe some mitigation that must need to occur, um, in order for the project to proceed. Again, it's the grantee's responsibility to carry out any mitigation required. Next slide, please. Okay. Now let's briefly, uh, cover the use of HUD's Environmental Review online system, which is also known as HEROS. Now, the use of HEROS is highly recommended to conduct a project's environmental review whenever possible, and all Part 50 reviews conducted by HUD will be prepared.

Speaker 2 00:39:49 Using HEROS, HEROS is an incredible tool that's extremely useful, especially for those that are less familiar with an environmental review process. It, it holds the user's hand and

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walks the user through the entire environmental review process from start to finish, providing prompts and questions for the user to answer, to make selections for, and then populating the next step in the process based on your questions. Um, it reduces a lot of error, um, a lot of confusion, uh, from the process. It provides links to, uh, re appropriate, you know, relevant regulation. Um, it provides the links to the HUD Exchange, uh, pages for each Law and Authority as you're working through them. Uh, it gives you instruction on what to do next. I mean, it, it is an incredible tool that everybody should be using. Um, and, and again, uh, you know, it really kind of holds your hand through the entire process, letting you know what information it needs, um, and how to comply with each law and authority. Next slide, please.

Speaker 2 00:41:03 All right, so here are a few resources for HEROS. Um, we have a lot of training materials and guidance on the HUD Exchange. Um, and you can find the links here. I know that these slides will be shared. Um, so you'll have that in those slides. Um, so, uh, we have, uh, like I said, a, a plethora of training and guidance materials on HEROS. We have a user guide that's kind of like the Bible for it. Um, we have a, a slew of very short brief how to videos that go through specific items in HEROS and how to use them. Um, so those are great. Uh, and, and, you know, uh, it's, it's less, um, imposing when you can just kind of pull up a video to exactly what you're looking for. Um, it's a very short, you know, three to five minute video that explains, uh, what you're looking to learn.

Speaker 2 00:41:52 We have several, uh, FAQs, frequently asked questions related to HEROS on the HUD Exchange. We have HEROS Worksheets, um, and we also have a special, uh, help desk called Ask a question, um, where you can essentially fill out a form, specify that your question is related to HEROS, and it'll go to a specific team, uh, dedicated to answering questions about HEROS. Um, again, more, more materials are available, uh, at the link provided, um, on our HUD Exchange page. Um, and then also there's a link there at the bottom there for the HEROS Access form. So this is how you would register, um, to gain access to HEROS is filling out that form. Next slide, please.

Speaker 2 00:42:40 Next slide, please. Okay. So now let's switch gears and cover some general and specific environmental review considerations as they relate to the PRICE program. Next slide, please. Okay, before we get into some specific environmental laws and authorities, let's discuss a few general considerations for PRICE. So, first off, under PRICE, as I mentioned before, recipients that are units of general local government. So if you are a recipient and you are also a unit of general local government, you will be conducting the environmental review under Part 58 as the Responsible Entity. And then conversely, if you are a recipient and you're not a local government, like for instance, if you're a nonprofit, um, then you must request that HUD prepare the environmental review for the project under Part 50. Another important distinction is that manufactured homes and communities are considered housing for environmental review purposes, but are not considered multi-family housing, which is an important distinction.

Speaker 2 00:43:51 And it's important in determining the level of review because there are additional environmental review requirements associated with multifamily housing that do not apply to manufactured homes or manufactured, uh, housing communities. So, again, I'll just reiterate this, um, while manufactured homes of communities are considered housing for environmental review purposes, they are not considered multifamily housing regardless of how many units there are. Um, again, this is just important when you're going through and determining

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your level of review. If you're using HEROS, you'll see what I mean, because it lays out all of the different, um, levels of review and you just basically check off, you know, which activities, um, are involved in your project, and then it will tell you what your level of review is. And, and you'll see that there are some, uh, criteria that involve multi-family housing, but again, uh, manufactured homes and communities are not considered multi-family housing for environmental review purposes.

Speaker 2 00:44:52 Also, PRICE funds can also be used to pay for the cost of preparing the environmental review, including the cost of testing and mitigation if necessary. This, this is a common question that we receive. Um, again, you know, can we use grant funds to pay our, our local government Responsible Entity, um, for the cost of preparing the environmental review? The answer to that is yes, you can use your grant funds to pay your Responsible Entity to conduct the review. Um, you can also use your grant funds to pay an environmental consultant to help prepare the review. Um, and then again, you can also use your grant funds to pay for the cost of test any required testing and mitigation associated with the environmental review. Also important to note here is that the Lead Safe Housing Rule outlined under 24 CFR Part 35 applies to all pre 1978 homes, including manufactured homes. MH manufactured housing communities are also more likely to be environmental justice communities, which will again, discuss in more detail in the coming section on environmental justice. And finally, relocation assistance is an eligible activity under PRICE. Okay, next slide please. Next slide, please.

Speaker 2 00:46:35 Adrian, can we progress the slide please? Thank you. Okay. So I will now hand it over to Glenn, um, who is our contamination subject matter expert to discuss contamination considerations for PRICE. Take it away, Glenn.

Speaker 5 00:46:50 Thanks, Omri. As you mentioned, I am a contamination subject matter expert, and I'm going to chat with you all a little bit today about some of the, uh, contamination specific, uh, items you may need to consider as you conduct your PRICE environmental reviews. Uh, next slide, please. Great. Um, so as Omri mentioned, uh, HUDs environmental review regulations also contain a contamination provision, both Part 50 and Part 58 contain the identical contamination provision. And this particular provision requires sites that are proposed for use in our programs that they be free of contamination, where that contamination could either affect the health and safety of occupants of residents, or where it could conflict with the intended use of a project. Now, these contamination provisions and now these contamination provisions, um, again, are identical and they both require what we call a contamination analysis to be conducted, uh, which basically means an analysis to evaluate for the potential or known presence of contaminants on or nearby or affecting that particular site being proposed for use in HUD programs.

Speaker 5 00:48:13 Um, as well, remediation or mitigation essentially, uh, will be referred to as cleanup of that, um, contamination of those nasty substances if a grantee wishes to use hard funds for a site, um, that is contaminated. Um, so if you wish to use that site, um, that is contaminated, you may then have to mitigate or, uh, remediate that site to certain levels so that that contaminant doesn't affect the health and safety of occupants nor conflict with the intended use of the project. And we see a link there to our site contamination page on the HUD exchange that explains much more detailed information than I have time to provide today. Definitely check that out. If you have specific contamination questions, there's a dearth of information there, talks about different types of documentation you'll need as well for contamination, and really it's an excellent resource. Now,

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turning specifically to PRICE and, uh, mhs and MHU, um, site contamination, you know, do primarily to legacy pollution can often be a big concern for mhgs as, uh, Kristen, our Director mentioned, uh, early on in her opening remarks, you know, historically, both low income and manufactured housing was often cited in the, uh, less desirable areas of our country.

Speaker 5 00:49:40 And often this would be, um, locations with significant industrial activity or perhaps dumping, uh, that may have caused significant contamination at or near sites, um, proposed for PRICE funding. So this, um, just given this nature of the country and our, um, history of legacy pollution, um, site commitment nation for PRICE projects is something that we particularly want to pay attention to. And that, um, may require us to give a little more pause as we're going through that portion of the environmental review for the project. And also, I do want to note that MHS themselves may also be sources of contamination with things such as asbestos and lead based paint. And, and we touched upon the lead based, uh, paint rule earlier. Uh, next slide please.

Speaker 5 00:50:36 Now, as I mentioned, you know, a site must be free of hazardous substances where they could affect the health and safety of evidence or conflict with the use, but some good news, this doesn't mean that if your MHC or the land that your, uh, MHU individual MHU sits on, it does not mean that if that's contaminated, that you can't use PRICE funding there. It also doesn't mean that if you can't afford to clean up, you can't afford to remediate that particular property that you can't use PRICE funding. So I just want to make sure folks know that there is some good news there. Just because the site itself may be contaminated does not mean you can't still be eligible per PRICE funding. As Omri mentioned earlier, the mediation remediation of contamination in particular at a site is an eligible expense under PRICE. So you could pay for this through a grant, say for other unrelated work for a PRICE grant, or, uh, even as the focus, the sole focus of a PRICE grant, uh, remediation cleanup of that contamination at a particular site, say an individual, uh, NHH.

Speaker 5 00:51:51 And then lastly, one thing I do want to note about, uh, contamination, if residents say, need to be temporarily located so that comprehensive remediation can be performed, say at an MHC, PRICE funds actually can be used for that as well for that temporary relocation. So remediation can be conducted, uh, which will also, you know, further limit your out of pocket expenses. So if I can really drive home two things here. One is that the contamination analysis that you conducted, uh, should, uh, for these types of projects just give you, if nothing else, a little bit more pause, and that you really want to examine that just due to the history of legacy pollution and where, uh, m MHS and MHC are often cited in this country. But then secondly, some good news, um, funding, uh, I should say mediation, mitigation of contamination can be eligible expenses under PRICE. So you would have the option to not have to pay for those out of pocket. So those are kind of the two things, uh, really to look at when you're dealing with the contamination portion of a hot environmental if you for PRICE projects. Thank you very much. Uh, next slide.

Speaker 2 00:53:14 All right, so I think now we'll go with, uh, hand it over to Dan Herrera, um, to talk about floodplain considerations for PRICE.

Speaker 6 00:53:22 Hi folks. Uh,

Speaker 5 00:53:24 My name's

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Speaker 6 00:53:24 Dan Herrera. I am OEE floodplains and wetlands policy expert. Um, so I want to, I want to kind of start things off just, uh, by mentioning to folks that floodplains and wetland management are very complex topics. We only have time to address a few of these high points today for your consideration, but these are topics with a lot of depth, a lot of technical terminology, and I would strongly encourage everyone to read through the HUD Exchange, complete the training modules therein, and, uh, discuss any project specific concerns with your field environmental officers as soon as possible. Uh, next slide please.

Speaker 6 00:54:08 All right, start things off. Um, HUD is required by executive order 11,988 to avoid impacts to floodplains and avoid direct and indirect support of floodplain development to the extent practicable HUD's regulations that, uh, that outline the compliance procedures for this, uh, can be found at 24 CFR Part 55. Part 55 applies to all HUD actions under the PRICE program. It could be harmed or cause harm if located in a flood plain. All right, if my sound is breaking up, I'm going to turn my video off because sometimes that helps with bandwidth. See if that makes it any better, um, for, um, okay, there you go. Uh, for more detailed descriptions of, uh, Executive Order 11988 compliance under 24 CFR Part 55, uh, please take a look at the floodplain management page, as I said on the HUD Exchange, which is linked below. Next slide, please.

Speaker 6 00:55:27 All right. Some specific considerations for PRICE. The PRICE program is subject to the requirements, like I said, of Part 55. This includes any required mitigation or elevation necessary for a location, and is in addition to the standard HUD manufactured home construction safety standards found at Part 3285. So those as a, as I said, the required mitigations or elevations necessary under Part 55, as well as the construction safety standards at 3285. Like any other environmental mitigation, as, uh, RI mentioned earlier, PRICE funds can be used to cover, uh, Part 55 required mitigations, and that includes any elevation costs, similarly to Part 58, Part 55 compliance, uh, four, Part 55 compliance, excuse me. Uh, MHS and MHC are considered single family housing and not multifamily housing. Uh, the caveat to this is that it, it does also mean that the sighting of any new MOUs is also considered new construction for the purposes of the com of compliance with this part, Nope, go back to sled. Not done there.

Speaker 6 00:56:45 One more. There you go. Uh, it must be noted that HUD funding cannot be spent in a floodway or a coastal high hazard area. That's a VE zone on a FEMA firm map. Uh, as Omri mentioned earlier, when you complete an environmental review, you have to factor in the entirety of project activities in that environmental review. So this means to that if any part of your project activities involve construction in a floodway, Part 55 would disallow it. Finally, I wanted to note here that Part 55 also lays out HUD's wetland requirements. So, uh, and, and states that HUD needs to avoid development in wetlands where practicable, uh, if work in wetlands is unavoidable, it should be noted that you may be required to do additional very expensive surveys, um, wetland delineation, uh, that kind of thing in order to meet your compliance requirements. Again, critical to work with your local field officers, um, field environmental officers to achieve success on complex projects. Next slide please.

Speaker 6 00:58:00 So this slide gives you a very brief outline of what's needed for basic Part 55 compliance. And I know it throws a lot of terminology that I haven't defined out there. Uh, we don't have time with this setting, obviously, but there's a lot more information on HUD Exchange about any terminology that may be a little confusing. So first and foremost, to comply with Part 55, you

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need to determine if any of the exceptions at 55.12(c) apply those exceptions would exempt you from Part 55 compliance. Uh, then you need to determine whether the project site contains a floodplain, and you would do that by looking at a FEMA flood insurance rate map, uh, or a preliminary flood insurance rate map. Uh, if, if those are available, uh, or whatever best available information there is about your site, um, then you'd need to determine if the eight step process is required. And if it is, complete it to identify any mitigation requirements that are necessary for your project. Every environmental review record should contain at least one of the things listed here, um, to prove your compliance with Part 55. Thank you. And next slide.

Speaker 2 00:59:18 Alright, thank you Dan, and thank you Glenn. Um, so next we will talk about disaster and community resilience considerations for the PRICE program. First off, resilience is a hot topic and term that's been thrown around a lot recently. You've probably heard it, um, which refers to a community's ability to minimize damage and recover quickly from extreme events and changing conditions. This is, uh, which are often related to disasters or climate change. Next slide please. Community resilience is a major focus and goal of HUD's fiscal year 22 to 26 strategic plan. Um, our strategic goal number four, aims to advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice and recognizing housing's role as essential to health. Our strategic goal four, A guides investment in climate resilience and energy efficiency and renewable energy across HUD programs. These goals also tie into and complement HUD's environmental justice priorities, which aims to prevent or mitigate adverse environmental or human health impacts that are disproportionately high for low income and or minority communities. And we'll discuss environmental justice in more detail in the next section. Next slide, please.

Speaker 2 01:00:44 Okay, so the PRICE, uh, I think we may have gone one slide too far. So back one slide. Um, back one more slide. All right, there we go. Um, the PRICE program nofo, uh, also directly supports the efforts of the strategic plan with its focus to increase resilience to extreme weather, natural hazards and disaster events, support energy efficiency, and pro protect the health and safety of manufactured housing residents. I believe there is between 10 or 15 points, uh, out allotted to sub factor B.3 in the NOFO, uh, environment and resilience. Um, this will be achieved by utilizing strategies to reduce the impacts of environmental hazards and extreme weather and increase the community resilience, especially when we're discussing reconstruction, relocation or mitigation for environmental assessment level projects. Right, so this is one of the higher levels of review. There is also an environmental assessment factor in the environmental review related to climate change that was recently added under the Climate Executive Order 14008, which addresses community resilience. So keep an eye out for that if your project rises to the environmental assessment level of review. Next slide, please.

Speaker 2 01:02:16 In order to qualify for, or sorry, I think there's one more slide between these two. So back one slide, maybe they might have gotten out of order. Can we go back one? There we go. Okay, that's good. Um, in order to qualify for the resilience bonus in the PRICE NOFO, your application must identify and describe if property is in a disaster prone location with future risks. Um, disaster prone locations are also known as community disaster resilience zones, and you'll also need to identify future risks to the community, such as natural hazards, extreme weather, and or disasters. The next slide contains several resources to assist applicants with their analysis. Next slide, please.

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Speaker 2 01:03:10 The PRICE NOFO highlights five resources to assist applicants with their risk analysis. Each resource contains different information and applicants may have to utilize multiple resources to adequately conduct risk analysis for natural disasters, climate change, et cetera. There are numerous mapping services and resources available outside of the ones that are listed on this slide by federal agencies, educational institutions, state and local governments, et cetera. These resources can further help prepare and inform a better understanding of the unique risk factors that impact the project area. In order to prepare an effective mitigation and resiliency strategy, local resources may contain more accurate and current information as well. So, um, keep that in mind as well. Next slide, please.

Speaker 2 01:04:06 Okay. This slide contains some key items to include in your application after identifying risks related to resilience, such as outlining how safety and stability of manufactured housing will be enhanced, uh, describing how the project supports low to moderate income households that may be vulnerable to weather related hazards. Um, also if the project area is subject to repetitive loss, then determining how will the project address and mitigate future losses and describing how weather resistance, uh, and climate appropriate materials will be used across all project sites. And then we also have a HUD Community Resiliency toolkit, which contains useful resources and strategies to help establish an effective mitigation and resiliency plan. Next slide, please.

Speaker 2 01:05:01 Okay, now let's move on to environmental justice. Next slide. Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, disability, or income. This also includes tribal persons with respect to both positive and negative environmental and health impacts of a project established under executive order 12898. Environmental justice requires consideration of how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and or low income populations. Manufactured housing communities are more likely to be environmental justice communities, as they often involve low income and minority populations, and are more likely to be cited in areas with adverse environmental conditions and concerns. So they're more likely to be cited in areas with, uh, contamination, um, in areas, uh, in a floodplain. Um, and so again, and, and they're more likely to, um, involve low income and minority populations. So it's kind of like a recipe for, you know, environmental justice essentially, and for them to be an environmental justice community. Um, now this slide includes a link to HUD's Environmental Justice page and a couple other helpful resources on environmental justice best practices. Next slide, please.

Speaker 2 01:06:42 So when we're talking about environmental justice compliance for a HUD Environmental Review, these are the major questions we have to ask ourselves. Does the project create adverse environmental or human health impacts? If so, are these adverse environmental or human health impacts disproportionately high for low income and or minority communities? How did the project sponsor reach out to the community to identify mitigation measures, to resolve adverse impacts and how will the adverse impacts be mitigated? So these are the basic questions that we, we talk about when, uh, that we have to answer, uh, when complying with environmental justice. Next slide, please.

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Speaker 2 01:07:38 Now to document compliance with environmental justice for a HUD Environmental Review, the environmental review record should contain one of the following items, either evidence that the site or surrounding neighborhoods does not suffer from adverse environmental conditions and evidence that the proposed action will not create an adverse and disproportionate environmental impact or evidence that the project is not in an environmental justice community of concern, or if there are adverse effects on low income or minority populations. Documentation that the affected community residents have been meaningfully informed and involved in a participatory planning process to address, meaning, remove, minimize, or mitigate, uh, any adverse effect from the project and the resulting changes. Next slide, please. Okay. So next we'll talk and walk through a few important and helpful HUD Environmental Review resources. Next slide. So, the HUD Exchange should be your primary resource and, uh, for environmental review, guidance and materials and training. And HUD's orientation to environmental reviews page is a great place to start, and you could find a link for it on this screen here, you can find helpful information about the HUD regulations governing the environmental review process, tips on what to include in your project description and scope,

Speaker 2 01:09:15 Tips on how to determine which level of review is required for your project, and many other important resources. Uh, we can't recommend it more. Um, we've worked really hard to put all of these resources together, um, and there's a lot of really good information training, guidance formats, templates, um, everything you can think of, um, related to the environmental review process. So, so it really should be your, your, your first stop, um, on, uh, the environmental review, uh, you know, guidance journey, essentially. Next slide, please.

Speaker 2 01:09:51 Okay, so this next slide shows our HUD Exchange page that provides info instruction and resources on completing review of the 17 federal environmental laws and authorities. This is an extremely helpful resource for compliance. Um, basically you just click on one of these laws and authorities, and it kind of, it goes through, you know, the questions that you need to answer in order to comply with that law and authority, uh, and then the documentation required in order to document that compliance. Um, so this is an extremely helpful tool, um, and provides a lot of really good resources. Now, HEROS, the HUD Environmental Review online system has a lot of this information built into it. So instead of having to go to one of these pages to see, you know, what questions you need to answer in order to comply. Um, you know, HEROS essentially just walks you through all of those questions. It prompts you with those questions, it prompts you for those answers. And then based on your answers, um, will populate what the next step in the process is. Um, so just another plug, um, for HEROS as a powerful tool, um, especially for those that are new to the environmental review process. Next slide, please.

Speaker 2 01:11:04 Okay. So Wiser, which is our web-based instructional system for environmental review, is another fantastic resource providing a self-paced web training series on environmental review from start to finish. And this will also remember where you left off after each use. So you can go in, do a few modules, learn about, you know, uh, certain parts of the environmental review process, and then, you know, you know, go about your, your business and come back and it'll remember where you are in the process. So again, another incredibly useful tool, there are quizzes in it. Again, it's self-paced, so you don't need to complete it all in one go. Um, and, uh, again, just a really great tool to kind of help orient yourself to different parts of the



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environmental review process. Again, all of these resources can be found and are linked to from our HUD Exchange main landing page. Next slide, please.

Speaker 2 01:11:59 Okay, so this last slide has links to the key resources, um, that we've discussed during this presentation. Um, so there have been links throughout all the slides throughout. Um, and this slide just serves to kind of put them all into one place, um, so that it's easier for you to access, um, anything from our general environmental review resources to the specific laws and authorities that we discussed, um, to the, uh, HUD Environmental Review online system. Um, you know, you can find the, the access form, the hero's access form link there. Um, so this will be helpful. And again, I, I believe we'll be sending out these slides so you'll have all these links available. Next slide please.

Speaker 2 01:12:40 Okay, that's it for the presentation portion. Um, again, thank you all so much for taking the time out of your busy days to attend this important session. Um, and, uh, I don't know if we will have time. It looks like we're coming up on the end of time. Um, but we're more than happy to take any questions. Um, and if, if we do run out of time, you know, we're more than happy to, um, to answer any questions in writing as well. Um, but I will turn it back over to Jennifer. Um, thank you very much.

Speaker 0 01:13:07 Thanks. OEE team. Um, we do have only a couple minutes left, so Omri, if you can, can we just answer a couple of questions and then we'll make sure that we're updating the rest in our FAQs?

Speaker 2 01:13:21 Yeah, sure. If you want to, uh, read the questions out, um, we can try to answer them as best as possible.

Speaker 0 01:13:26 No problem. Um, and just a reminder to everyone under the HUD Reform Act, HUD cannot advise applicants on their application. The NOFO is the definitive source for information about application requirements. And if your questions aren't addressed during this or you're not seeing the FAQs, feel free to submit your questions to PRICE at HUD dot gov. Um, so one of the first questions that we received was, does an ER need to be done for the entire manufactured housing community or just the unit?

Speaker 2 01:13:57 So the environmental review needs to aggregate all of the related activities that are involved in the project. So any anything that's related to the project, um, in terms of if it's on the same site and you're conducting those activities, uh, regardless of funding source, um, or if it's a logical component of the project. So if, you know, if activity, unless activity A was completed, then we can't do activity B, right? So it has to, it has to meet one of those, uh, basis, basis for aggregation that we discussed in, in the previous slide. So either it's on the same site, um, and is a related activity. Um, so if there's just, you know, uh, other manufactured housings on the site, um, that are not involved in the project and there's no activity being involved there, um, then they do not need to be included. Um, but you know, if there are activities related on any one of the bases for aggregation, um, then they would need to be included in the, the project scope of the review.

Speaker 0 01:14:59 Great, thank you. Um, for existing manufactured dwelling parks with plants for major infrastructure improvements, how does choice limiting actions apply?

Speaker 2 01:15:10 I'm sorry, could you repeat that?

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Speaker 0 01:15:12 Sure. For existing manufactured dwelling parks with plans for major infrastructure improvements, how does choice limiting actions apply?

Speaker 2 01:15:21 So choice limiting actions apply in the same way. Um, you know, without getting into the details with project specific details, you know, which again, will, will have to happen, um, you know, at a later date. Um, yeah, I mean it still applies even if it's an existing community, right? If there are activities being planned, um, as part of the project, um, then those activities cannot move forward until the environmental review's completed, regardless of whether or not it's, you know, infrastructure improvements or the, you know, there are existing units there. Um, the, you know, whatever activities are planned or, um, and are part of the project, uh, cannot proceed until the environmental review's completed.

Speaker 0 01:16:02 Great, thank you. Uh, and then we'll do one last question before we move into wrapping up. Um, if a site already has a Part 58 HUD Request for Release of Funds as a result of other federal funds, does a nonprofit PRICE applicant need to start a new environmental review process?

Speaker 2 01:16:20 So that's a great question, and it will depend on the specifics of the project and of the environmental review that has already been completed. Um, but if there is an environmental review, a HUD environmental review that has already been completed for the project, um, and really, you know, the PRICE funds are just adding funds to the existing project without increasing the scope of the project. And, and, uh, and if the environmental conditions are still the same, then there is a possibility of being able to, to just essentially adopt or use, um, that existing Part 58, uh, environmental review. Um, because essentially, again, if the project isn't increasing in scope or they're not adding units or there's no additional infrastructure or other activities being added to the project, and there's already been a HUD Environmental Review conducted for that project, and you're really just adding additional funds to that existing project that has already been approved by HUD, um, there's something called a CENST, which again is the categorically excluded, not subject to the laws and authorities.

Speaker 2 01:17:33 And you can do A-CENST, uh, supplemental funding supplemental assistance review, which is a very limited review that is essentially just adding the additional funds to an already approved, um, environmental review project essentially. Um, now this, this, this is a little bit more of a complex, uh, item that you'll need to kind of discuss, um, at a later time when we're able to, um, with your environmental officer. Um, but in general, right, if there is already a HUD Environmental Review that was conducted and approved by HUD through a Request for Release of Funds, and the project is staying the same, there's no addition of extra units or extra activities or anything like that, it's just an addition of funds, um, then there is the potential to use that existing environmental review. Thank

Speaker 0 01:18:21 You so much with that last response. We are now near time. Um, move on to the next slide, please. So here's some information for our next webinar in the series. Um, as I mentioned at the top of the webinar, this is being rescheduled from April 17th to April 18th, and next week's presentation will look at Civil Rights and Fair Housing. Um, thank you so much for joining us today, and we hope to continue to see everyone at future webinars. Have a nice afternoon.