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Speaker 0 00:00:00 Welcome everyone to the Pathways to Removing Obstacles to housing or Pro Housing Notice of Funding Opportunity Webinar number five. Thank you for spending your Thursday with us before the holiday weekend. Today we'll be covering environmental disaster recovery and resilience considerations and the Pro Housing competition. My name is Landon Laven Jones. I'm a community planning and development specialist here with HUD, and I'll be moderating today's webinar. Next slide, please. All participants for this webinar will be muted. So, we ask that you submit your questions using the chat feature. Make sure you to send your question to all panelists so that our presenters may be able to see it and respond. And also, as a reminder for those who may be hard of hearing, we do have a closed captioning option on the left side of the software. Today's agenda will begin with a brief refresh of the Pro Housing NOFO. We will then hear from HUD's Office of Environment and Energy and HUD's office of Disaster Recovery. We will leave time at the end for a live Q&A. Next slide, please.

Speaker 0 00:01:10 As I mentioned before, this is the fifth in a series of weekly webinars covering HUDs Pro Housing NOFO. These webinars are intended for potential Pro Housing applicants and provides participants with an overview of Pro Housing and the application requirements. Webinar recordings and links to future webinars are posted on the Pro Housing webpage. If you visit the webpage today, the recording transcript and slides from the first two webinars are now available. We expect to have the webinars for three and four posted shortly. Next, we will hear from Jessie Handford Kome, our director of HUD's office of block grant assistance. Jessie will provide us with a brief refresher of the Pro Housing. NOFO. Welcome, Jessie.

Speaker 1 00:01:55 Thank you, Landon. Next slide, please. We can go to the next slide after that too. I'm the director of the Office of Block grant assistance. We're going to do a quick refresh of the Pro Housing NOFO to show you where the resilience elements are and to just refresh us. So, what are the Pro Housing grants for Pathways to Removing Obstacles to Housing or Pro Housing is an \$85 million competitive grant being administered by HUD. Pro Housing seeks to identify and remove barriers to affordable housing production and preservation. It's a component of the CDBG program. And the submission deadline is October 30th, 2023. See the NOFO for details on exact time and how to do it. Next slide please.

Speaker 1 00:02:49 What activities are eligible? Each proposed activity must be an eligible CDBG activity pursuant to Section 105(a) of the Housing and Community Development Act of 1974 as amended and applicable program regulations at 24 CFR part 570, or receive an eligibility waiver for the activity requested in the application. We did make new construction of housing eligible preemptively in advance, in the NOFO. Next slide, please. So, eligible activities can be grouped into categories, planning and policy activities, development activities, infrastructure activities and preservation activities. But there's a lot of specific examples. So, you can look in Section III.F.2.c of the Pro Housing NOFO. Next slide.

Speaker 1 00:03:49 So one of the places that resilience appears in the NOFO is in the definition section, and we define resilience in the NOFO as a community's ability to minimize damage and recover quickly from extreme events and changing conditions. So that's just the working definition of resilience that we're using for the purpose of this NOFO. And we'll show you where it gets scored, where you need to have this definition. So next slide. Inside the rating factors you have need, soundness of approach, capacity, leverage, and long-term effects. And you can review the complete prompts in Section V.A.1 on

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the NOFO. This presentation doesn't have all the texts for factor prompts. Next slide. So, where we put resilience with a specific mention, although it can be embedded throughout, is we asking long-term effect, what permanent long-term effects will your proposal have and what outcomes do you expect? And one of the things we say is sure to address how the removal of barriers will result in more resilient housing and sustained production. So, we're looking for housing that is resilient, which means it helps the community adapt to extreme events and changing conditions. And we're going to want you to address that, you know, be sure to address, is the language or the factor. Next slide please.

Speaker 1 00:05:28 Also, inside long-term effect, we talk about a range of things. describe what you will have achieved upon completion of grant funded activities, what roadblocks, blocks your proposal might be facing. Please excuse a little formatting glitch here. What are the most likely ways in which the barriers might persist despite your activities? How your proposal will result in reducing housing cost burden. How your proposal represents a model. But we also say, describe the community's most significant environmental risks and how the proposal is aligned with them to efficiently promote community resiliency. So, this is another place where we're talking about resiliency inside the long-term effect factor, right? So, these are the considerations for resilience that are in the NOFO that must be addressed in the factors.

Speaker 1 00:06:27 Next slide. And then we're also in long-term effect, although we don't say the words resilience here, we talk about for the entire factor. We would like, if possible to propose metrics, for what your target outcomes will be and what you're striving to achieve. And resilience should be considered in the context of, you know, what you consider success to look like at the end of the period of performance or beyond, because it's addressed as part of the factor above this question. Next slide. And with that, I'm going to turn it back to the moderator to introduce our next speaker. Thank you.

Speaker 0 00:07:16 Thank you so much for that refresher, Jessie. We really appreciate it. Next on the agenda, we have Brian Schlosnagle. Brian joins us today from HUD's Office of Environment and Energy, where he has been the program Environmental clearance Officer for the CDBG-DR CDBG-MIT for the past year. Prior to joining OEE, Brian spent 11 years in HUD's Office of Public and Indian Housing as an engineer with a focus on PIH's disaster management and resiliency. Welcome, Brian. The floor is yours.

Speaker 2 00:07:47 Thank you very much. glad to be, part of this discussion. next slide please. So, what does the NOFO say about the environment? So, in today's discussion, we will be covering two primary aspects of the environment. One specifically for the environmental review requirements specified in the NOFO, and then as Jessie alluded to, diving more into long-term effects of environmental, barriers and conditions outlined in the NOFO as well. Next slide please. So, environmental reviews have to be completed one of two different ways, and that's really going to depend on your overall entity. For example, if your grantee who is a state or unit of general local government, you'll be operating under the 24 CFR part 58 environmental review requirements, specifically where you'll be operating as responsible entity, to fully complete the environmental review and make all determinations for the environmental review. However, if you are a grantee that is not a state or a unit of general local government, and are not a recipient of funding under Title one of the Housing and Community Development Act of 1974, you will then be operating under 24 CFR part 50, where HUD is actually conducting environmental review.

Speaker 2 00:09:14 It's important to note that either operating under part 50 or part 58, all laws and authorities are the same for either, for example, environmental justice requirements are set forth both in

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both of these parts amongst other policies of the National Environmental Policy Act or NEPA and all other environmental review requirements. The NOFO outlines the specific environmental review requirements in Sections IV.G.2.c and also VI.E of the NOFO. Next slide please.

Speaker 2 00:09:51 In addition, we wanted to express, and highlight choice living actions to ensure no grantee suffers or goes through a choice limited action, which can result in either repayments or, of funds, or also the inability to use grant funds as well. So, in the Choice Limited actions, there are specific requirements that you have to be aware of specifically for the recipient of project partners and their contractors. They may not acquire, rehabilitate, convert, lease, or repair or dispose of or demolish construction property. So, in essence, that is completing any type of work related to the property or the project. And furthermore, you cannot commit or expend or obligate any HUD or non-HUD funds. this is very important to distinguish that it is all funding that could be possibly associated with this project. obligating, any type of funding can limit the overall choices when going through the environmental review process in order to actually utilize funds or are one of two different ways to accomplish and complete the environmental review in order to start to obligate and expend funds.

Speaker 2 00:11:11 And that's going to depend on if you are operating under, 24 CFR Part 58 or under 24 CFR part 50. For those that are operating under part 58, the responsible entity has to complete the environmental review procedures and complete the environmental certification and submit a request for release of funds to HUD, which will then be approved by HUD with an authority to use grant funds. For those environmental reviews being completed by HUD under part 50, the overall process requires HUD to complete the environment review before actually expending or obligating funds for that grant. Next slide please.

Speaker 2 00:11:58 So Jessie spoke to several points about the long-term effect of identifying barriers for environmental factors and also for resiliency. And one of the major components outlined in the NOFO is those related to natural hazards and climate change. Over the past several decades, we have encountered numerous natural disasters that have been further exacerbated by climate change. And the data from those events show there is a disproportionate impact of low-income communities and communities of color, compared to other neighborhoods and communities in the vicinity. And that has, many, historical background of justifications of why that is. Overall, there are several different possibilities of, of different barriers associated with natural hazards have been influenced by climate change listed out on the left. And also, several things that can create barriers for site suitability outlined on the right-hand side, each of which will require a review of those specific barriers to help review and identify those barriers. Next slide, please.

Speaker 2 00:13:19 There are several different resources available that HUD has. A prime example is the HUD Community and Resilience Toolkit, which outlines all the identified climate related natural hazard risks that we just saw on the previous slide, and helps you understand what those barriers include and how to begin to assess those. In addition, there are opportunities to look for different, resiliency measures for housing infrastructure and for residents, and then also how to actually implement those resilience actions. In addition, HUD has also made several different references, throughout the Resilience Toolkit and also other aspects on our HUD Exchange website that encourages the use of US Climate Resilience toolkit where you can consider climate change impacted to a local level, in addition to Climate Change Adaptation Resource Center issued out by the EPA and also the climate change and social vulnerability in the United States also issued out by the EPA. Next slide.

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Speaker 2 00:14:27 In these resources, there's many different references to multiple, mapping resources to better understand barriers. Those can come from different federal agencies, educational institutions, and state and local governments. We have a few of those that are listed out in those references, such as the NOAA Sea Level Rise and Climate mapping, resilience and adaptation, and Human National Risk Index. And there are several others included in those references to help understand different barriers for specific areas throughout the country. Next slide please. So does HUD have resources related to the environmental review? And the answer is yes, there is a multitude of environmental resources found on HUD Exchange, related for all the different laws and authorities to how to process environmental reviews effectively, and when to start the overall environmental review process. In addition, one of the new aspects that's included on HUD Exchange for environmental reviews is the addition of the environmental assessment factor of the climate change impacts, which also helps identify different barriers, promote resiliency measures, and things that echo in many of those as well.

Speaker 2 00:15:52 Slide please for our last resources that we have available. HUD has published a HUD Climate Resiliency Implementation Guide that goes over many of those same barriers that we discussed earlier, and also outlines several different opportunities for resiliency measures. So, that includes natural based solutions, cool roofs, and several others listed low. And finally, one of our relatively newer resources available on the HUD Exchange is Built for the Future, which is becoming one of our one-stop shops of pulling lots of different climate related information to one central location for resources. And in addition, if you have any environmental questions, you can utilize the HUD Office of Environment and Energy Staff contacts, which lists out all of our different field environmental officers and regional environmental officers for additional questions that you may have on the overall process. And with that, I'll hand it over to our next presenter. Thank you.

Speaker 0 00:16:59 Thank you so much, Brian. Next we will hear from Frank McNally. Frank McNally is the Deputy Director of HUD's Office of Disaster Recovery. Frank joined the ODR in 2013, coming from HUD's Office of Economic Development, where he served as the director of the Congressional Grants Division. Frank joined HUD in 1999 and has worked in the Office of the Secretary and in the Office of Congressional and Intergovernmental Relations. He joined HUD's Office of Community Planning and Development in 2001, working with the Section 108 Loan Guarantee Program. Before joining HUD, Frank worked for more than 15 years in the speaker's office of the New York State Assembly as a senior advisor to the speaker on energy, economic development, banking, and insurance issues. He received his bachelor's from Siena College and his master's from West Virginia University. Welcome, Frank.

Speaker 3 00:17:52 Thank you. Good afternoon everyone. I'm Frank McNally. The Office of Disaster Recovery here at HUD is housed alongside the Office of Block Grant Assistance, which is leading, the Pro Housing effort. Our office administers a, a portfolio of, \$100 billion and counting of Community Development Block Grant disaster recovery funds. We are built, as the name suggests, on the chassis of the Community Development Block grant program. The good news, in the context of this competition and its emphasis on resilience is, communities and states across the nation have been using CDBG-DR funds, for decades. And, we have real examples of housing and infrastructure that prove to us that those investments pay dividends. And by that I mean, as the frequency of disasters have increased, it has provided us an unfortunately or fortunately, and our, state and local government partners with opportunities to see that investments in and resilience and mitigation do in fact matter when that next disaster strikes.

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Speaker 3 00:19:17 We have within that a hundred-billion-dollar portfolio, we have about \$20 billion of funding that has been dedicated exclusively to investments in mitigation and resilience. And that has come through the National Disaster Resilience Competition that has come through the Rebuild by Design initiative, that has come through our CDBG mitigation grants. And I mentioned this because you are not alone in trying to figure out how to build more disaster resilient housing. We have scores of states and local governments using our funds on the ground who have experienced both good and bad, to share with you. what, what, could we go to the next slide? What I'd like to do is, is touch on, could we go to the next slide?

Speaker 3 00:20:24 What I'd like to do is just touch on a couple of resources that we have that may be beneficial to you as you think and plan for your investments in more resilient housing. The first resource listed here is, is our exchange page. And there is just a wealth of information on, on the exchange, on the CDBG-DR HUD Exchange. And much of it focuses specifically, on resilience, and mitigation. And you will find there's just a variety of toolkits there. And I want to focus your attention on just a couple of the newer ones that seem relevant to the work that you have in front of you. The first is the Citizen Participation Equitable Engagement Toolkit. This is a toolkit that suggests strategies, processes, best practices for engaging elements of your community that might not typically be part of the conversation, and ensuring that you are getting the full picture of your community's, housing needs and with an eye towards equitable recovery outcomes.

Speaker 3 00:21:52 So in this context, we know that lower income and economically distressed communities take longer to recover. And this toolkit is geared toward is providing you with resources to ensure that you're capturing the full range of needs and interests in your community as you begin to think about your resilient housing goals and plans. The next element that I wanted to talk about, or, or just draw your attention to, is the Resilient Building Codes Toolkit. So there's an increased attention across the federal family, and among our grantees on using, using building codes to leverage cost effective resilience, particularly in the realm of housing, but also in the realm of infrastructure.

Speaker 3 00:23:06 And this toolkit, provides you, with a roadmap of what the codes entail and how they've been used in various settings to enhance the resilience of a community and to help mitigate the impacts of, subsequent disasters. And I will, I will tell you that, and I will get to this in a moment, that, our grantees, many of our grantees, have been through multiple disasters over an extended period of time and have built their codes specifically, with that experience in mind and as, as a new disaster strikes see that paying dividends in terms of the cost of recovery. So, I encourage you to spend some time with the Resilient Building Codes Toolkit as well. And then our very best resource, are our grantees. If you have the opportunity to engage with our grantees, they can share, their, their experiences, what has worked for them, what has not worked for them, in the context of, particularly, housing resilience.

Speaker 3 00:24:30 We have been on a journey with our grantees, starting with some of the earlier initiatives that I mentioned, back in the day when the notion of perhaps resilience and mitigation was new. From a HUD policy, housing policy perspective, we are now in a place where HUD now requires grantees to. If there were no longer pilots, if you will. But we are now we and our grantees now bake in to our housing disaster housing recovery efforts, our infrastructure restoration. We, we bake in mitigation and resilience, measures into that rebuilding activity. So, I list these last two resources for you, because they are grantee led sessions. The first link there below the Resilience Building Codes toolkit,

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that first link are grantee led sessions around, regular CDBG-DR but also around mitigation, from a grantee perspective.

Speaker 3 00:25:47 And then the last link on this resource that I wanted to share are the contact information, the names and contact information as for each of our grants. And I would encourage you, to look at a community with a lot of experience and disaster recovery and mitigation. Many have been in this space for a very long time and have lots of experiences and actual projects to share best practices and not so best practices. So I, I would encourage you to start at the top here, start at the exchange, spend some time on the exchange, take a look at the resources that are available, and then if you're so inclined, to engage with some of our grantees who are on the ground and actually building more resilient housing, with their recovery and mitigation funds. And with that, I will turn it over to our next presenter. Thank you.

Speaker 0 00:26:57 Thank you so much, Frank. Can we move to the next two slides, please? Then the next one. Thank you. So now we will transition to the Q&A portion of our webinar. Before we begin, I'd like to remind our audience that HUD competitions are governed by the HUD Reform Act. This means that HUD cannot provide advice about prospective proposals, including whether a proposal would be eligible or competitive. We cannot interpret the NOFO, but we can tell you whether something is in the NOFO or the CDBG framework. The NOFO is the definitive source of information for Pro Housing. We'll answer the questions that we can, but please be sure to check the Pro Housing webpage for updated FAQs and tune into the subsequent webinars if we're not able to answer your questions today. And with that, we'll go to our first question. Okay. Jessie, this one is for you. Does the entity score higher by combining projects versus focusing, focusing only on one project?

Speaker 1 00:28:05 Well, this is one of those questions where we can't give you advice about what's going to score higher or not higher. Under the Reform Act, we can't give you that kind of advice on per perspective proposals and ask you to consult the NOFO, about naming how we're going to rate and rank applications. The NOFO does say that a sound proposal, we'll seek to enable increased production and preservation of affordable housing across a broad geographic area over a sustained timeframe. That's in the soundness of approach factor.

Speaker 0 00:28:43 Great. And a follow up to that, is it possible to include multiple projects slash uses within one grant application?

Speaker 1 00:28:52 Yes. applicants may propose multiple activities. Activities is the term that the CDBG framework uses, so long as all activities are eligible, an eligible applicant may only submit one application, and that's verbatim from the FAQs that we have up now.

Speaker 0 00:29:16 Okay. And just bear with us for one second, folks. we're getting our next

Speaker 1 00:29:19 Question. Sure. While you're working on that, I also want to say that, I came up through disaster recovery and I can say that a lot of the materials that Frank pointed to, and grantee experiences that you can read about, point to reducing barriers to production in peace time, so that after a disaster, you're not going to have to untangle your entire system before you can move on to recovery. So, getting things sorted out streamlined has benefits now and potential benefits if something unfortunate happens.

Speaker 1 00:30:05 So do we have any other questions?

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Speaker 0 00:30:07 Yeah. Since this grant is modeled after CDBG, will beneficiary forms be required?

Speaker 1 00:30:15 The CDBG framework doesn't, the, the regulation doesn't require beneficiary forms. Maybe your grantee or state CDBG grantee does. What we require though, is that you each activity meets a national objective, and you can document a low- and moderate-income national objective several ways. If you are housing someone though, typically demonstrate that they're low and moderate income and there usually is something that some grantees call a beneficiary form. The standard CDBG answer would apply though. To demonstrate benefit, you have to maintain the proper documentation and documentation for entitlement communities as at 24 CFR 570.506. You got anything else?

Speaker 0 00:31:18 It doesn't look like we have any additional questions. I'm willing to wait a couple of seconds if you want to.

Speaker 1 00:31:26 Does anybody else have any questions? You've got us here. I realize it's got the holiday weekend problem here for sure. <laugh>, but make sure you do check the questions. We're, we're updating the FAQs. There is a question that's come through that didn't go to all panelists. Will we be reporting CDBG outcomes in IDIS for Pro Housing? I believe we're using DRGR instead. because for IDIS, it's not cost effective to modify for individual grant outcomes. So, we shifted to the DRGR system, which is in a lot of ways similar, in order to be able to do custom outcomes based on grantee proposals. It also collects the standard CDBG national objective information, and we'll provide training on that if you're given an award.

Speaker 0 00:32:35 Yes. And we just received a question, when does HUD expect the grant opportunity to open on grants.gov?

Speaker 1 00:32:43 All right. I expect, gimme a second. We have a little working area. I'm hoping somebody is typing that like crazy. We're anticipating it to be toward the end of next week, but I know we're working on getting it stood up. We were just working on getting our Paperwork Reduction Act official number before we could push the button to push it out officially. So, it's very, it's very close at the time that we're making this webinar. The preview page says September or early September, we're still on track.

Speaker 0 00:33:30 Looks like we have a question that's, come through and we'll see, if we have a response for that one.

Speaker 1 00:33:37 Do you have another question?

Speaker 0 00:33:38 Should be coming through soon.

Speaker 1 00:33:41 Okay.

Speaker 0 00:33:50 So the question is, is there a limit to the amount or type of partnerships created in the grant application?

Speaker 1 00:33:58 The NOFO doesn't give us specific limits to the amount or type of partnerships. The capacity factor does locate the applicant's capacity to manage the whole thing, whatever you're proposing. I can see a couple more that seem to be coming through. If a city is using land value, I assume a donation, so I'm answering based on that, as leverage. How do we show commitment? The NOFO says

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firmly committed, HUD is going to ask its attorneys to tell us if something's firmly committed as leverage. And, if you are asserting a particular valuation, the gold standard is an appraisal for evaluation. I'm not sure that they would be able to get to firmly committed or not, without some really good form of valuation.

Speaker 0 00:35:31 And so for those applications that are awarded, are states required to amend their consolidated plans?

Speaker 1 00:35:41 I don't remember what the NOFO says about consolidated plan amendments, but the general rule of thumb is if you fund an activity that's inconsistent with your comprehensive plan goals, you need to amend, adding and deleting an activity. Regular CDBG does also require a substantial amendment. We would definitely, if you got an award talk to you, if we thought you needed an amendment, we would talk to you about exactly how to do it. But the citizen participation, the public participation requirement in the NOFO stand in place, if you get awarded, then we would talk to you, if we saw something that triggered a change, for an existing grantee.

Speaker 0 00:36:34 Okay. And I believe we've seen this one before, but is there a limit to the number or type of partnerships created in the grant?

Speaker 1 00:36:40 No, we just, we just answered that.

Speaker 0 00:36:42 Yeah.

Speaker 1 00:36:43 Somebody is putting in quite a lot of questions, guys, so just give me a second <laugh>, we're waiting through taking a look. For long-term effects, can your application receive full points even if your geographical area is not designated as a priority? I don't know offhand whether the long-term effect factor references cover that specifically, but it is talking about the long-term effects in your, in your geography that you propose. They, everything all ties together from need all the way through. So, if you're going the alternative path and not going with priority geography and taking the three points and moving on through, I don't think we say priority geography and long-term effects, but we'll have to look at that and get back in an FAQ on that. I can't answer that off the cuff. If there's somebody else on the panelist team who's helping out, who can, you can jump in if you have the citation from the NOFO, but I don't have it right at my fingertips.

Speaker 4 00:38:21 Yeah, I can jump in. So, your status as you know, if you're primarily serving priority geography or a non-priority geography that only impacts rating factor A lowercase ii, it's not going to impact long-term effect.

Speaker 1 00:38:38 So soundness?

Speaker 4 00:38:42 Need.

Speaker 1 00:38:44 Well need and soundness talks about priority geography somewhere too. Okay. So, both of them, all guess, predominantly need. There's questions about allowable costs and eligible uses. With CDBG you're looking for the eligible activity and then the costs of that activity are generally, allowable with the limited reference that the NOFO gives that, there we don't do general costs of government. So, most of those kinds of questions can be answered with, look at it from a CDBG point of view, stand in the eligible activity costs that can be allocated to that cost center for that eligible activity, because that's the way we do accounting and CDBG. Those costs are eligible and they would be,

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generally allowable, if they're necessary and reasonable. There's a whole lot of program jargon, but that's the way the financial management works for CDBG and it's like federal grant management 101 as well.

Speaker 1 00:40:18 Looking quickly through the other questions. If an organization has planned to be a sub-recipient of the grant, do they need to submit a letter of commitment? You're not required to have partners. and in CDBG and the CDBG framework, the grantee can just select sub-recipients. So, putting those two things together, you would not have to have a letter of commitment. In soundness, you would describe, you know, how that in capacity, how that subrecipient would fit in to what you're doing. But grantees and CDBG have selection of means of carrying out activities that's in the CDBG regulations. They can use force account labor, their own staff, contractors, sub-recipients, and other means, such as funding a developer or something. So, it's grantees choice for on the CDBG framework.

Speaker 1 00:41:34 And that plays through into answering that question. So, you asked for leverage funds to be committed, but at the same time, environmental review requirements consider committed funds to be a choice limiting action. Can you clarify this apparent conflict? I can. So, you're committing those funds talking to HUD, you're committing those funds to the activity as leverage, in your application, but you are not committing them and limiting choice for the actual like, piece of land or you know, physical place in the world yet. So that's allowed, but you need to keep track of that, right? You're not you're not putting in an offer for a piece of property, yet. So, it is a little bit of a dance, and you can call and talk through with an environmental review specialist, you know, the sequence of events that you want to do, and they can give you general advice.

Speaker 1 00:42:52 They can't tell you specifically about this NOFO, but there are environmental review specialists in every HUD office, but there's a difference. It's committed to HUD in an application as opposed to commit to change the world with your money or your resource. And it's just the direction basically it's aimed at. If our proposal involves building a new building or retrofitting an existing building, will Davis Bacon and related to BABA apply. Yes. It's on the CDBG chassis. All the cross-cutting hits, all the cross-cutting requirements hit the exact same way they would for CDBG. There's a question I don't quite understand, maybe somebody else on the panel here. Does can a state that was, I think it means has 42 counties in the priority geographical list receive the additional points. You can. I think what they're asking is do they get the, they get the 10 points, and then can they also get the, the three points. Any applicant can write narrative for the three points? I hope that answers your question and you kind of gave away who you were, by the way with the 42 counties.

Speaker 4 00:44:49 Points. can I, can I jump into that? Yeah, Colin, I think it might also be asking, you know, can we qualify for the 10 points on the grounds that we have x number of counties or, or something, to receive the 10.

Speaker 1 00:45:03 Points. Do they want 400 points, 42 times 10? No, you can't get that.

Speaker 4 00:45:06 So, to receive the 10 points, the application needs to primarily serve a priority geography, right? So, it depends on what, what the application targets.

Speaker 1 00:45:16 But you can also write for the three points per, you know, if there's other areas you want to talk about or work, propose or whatever. If you want to answer the questions in that factor. But yes, you must primarily serve a priority. Geography say that 10 times fast. We got asked how a city

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would show commitment of TIF funds, that's been asked before. Our answer is the same. It is, you have to be able to firmly commit an amount of funds because we asked for a specific dollar amount and our lawyers have to agree that the funds are firmly committed. My guess is that you'd have to go with something like if the TIF got that much, if not you would kick in from general funds or something like that. If that's what you're worrying about is that your TIF won't generate enough.

Speaker 1 00:46:26 But, it, it's just a question for lawyers to us, is it firmly committed or is it not in a specific amount by someone who's all threats to commit it? Okay, we just got a long one so we're reading it. Okay. If a city is not a priority community but is part of a county that is a priority community, would an application from the city qualify for points based on the county status? What if it was a joint application from the city and county? We can only answer you in the words of the NOFO, which is your application. Your, your approach has to address the needs of the priority geography. We didn't say you have to do whatever you're going to do in the priority geography. We said that you have to address the needs, the barriers of the priority geography. So, there's just too many different combinations of things in the country, for us to go like a super, super specific answer beyond what the NOFO says there. I think we've waded through all the ones I see in the chat. Anybody else getting any privately, anything else to put up? We'll take a quick look at our team that's sorting questions out.

Speaker 0 00:48:32 There's a clarifying one. If our activities don't target a priority geography, we only lose the 10 points in need, not others? Our priority geographies in our area are predominantly white and wealthy.

Speaker 1 00:48:46 I think that's that the NOFO digs in hardest on priority geography in need because we're following the statutory direction to give priority to geographies that meet certain criteria. And then after that we're hunting for, capacity to work in whatever your geography is, your sound approach, leverage and long-term effects. And I think that the question is correct. The NOFO doesn't really speak to priority geography specifically with points. But you know, I haven't tried to walk that idea all the way through to be a hundred percent sure, but I think it's largely correct. Yes. I think that's the only automatic place.

Speaker 0 00:49:45 Okay, and with that last response, we are going to close, we will have another webinar next week, Thursday, September 7th that will cover fair housing considerations for the Pro Housing competition. The link for that webinar is posted to HUDs Pro Housing webpage. And don't forget, you can always email your questions to CDBG-PROhousing@hud.gov at HUD dot gov anytime. And our team will strive to respond to your email by the next business day. We hope to see you all next week and wish you a great day and a safe holiday weekend. Thank you.

Speaker 5 00:50:20 That concludes our conference. Thank you for using event services. You may now disconnect.