



U.S. Department of Housing and Urban Development

Office on Environment and Energy

Consultation on HUD's Draft Departmental Policy for Addressing Radon in the Environmental Review Process Notice (October 20, 2022)

Speaker 1:

Welcome and thank you for joining today's conference, consultation and listening session on HUD's departmental radon policy. Before we begin, please ensure that you have opened the chat panel by using the associated icon located at the bottom of your screen. If you require technical assistance, please send a chat to the event producer.

You'll need to submit questions throughout the presentation to all panelists from the dropdown menu in the chat panel. Enter your question and the message box provided and send. All audio lines have been muted until the Q&A portion of the call. We will give you instruction on how to ask a question at that time.

With that, I'll turn the call over to Kristin Fontenot, Director of the HUD Office of Environment and Energy. Please go ahead.

Kristin Fonteno...:

Thank you so much and thanks everyone for joining us this afternoon, East Coast Time. I'm very excited to be here and to hear from all of you and to listen to comments and questions and concerns that you may have on this important topic.

Before I get started, I just want to introduce a few members of my team. You should see them, as well as myself, at the top of your screen. Lauren Hayes Knutson is our HUD Environmental Policy Division Director and has been working very hard on the topic we're about to discuss.

And Kathy McNulty, another critical member of our team, one of our senior environmental policy analysts, has been working through these pieces as well. And will take the lead for us in talking through how we got here, why we're here today, and what it is we're looking to achieve.

As we get started though, I do want to say again, thank you for your time. I know we all have much to do. This is a topic that, since I have joined HUD's department as the director of the Office of Environment and Energy, I have taken very seriously. And you will hear from Kathy why that is. And some of the important recommendations that we have in front of us to address the goal of minimization of radon exposure across the nation. And that is something that I certainly take very seriously, I know my team takes very seriously.

And what we want to accomplish is clear, implementable means of delivering that important goal. All the way to HUD's Secretary, Secretary Fudge, this has been an important topic. And it is seen in the HUD five-year strategic plan as one of the key pieces that we are charged to act on. The Office of Environment and Energy has taken a leadership role in that space and so very, very excited to get to a place in time where we get to speak to you about it and to seek that feedback.

And with that, I will turn it over, Kathy, to you. I don't want to take up any more unnecessary time. I'm looking forward to the next hour together. Kathy, over to you.

Kathy McNulty:

Thank you. Next slide, please. So I'm Kathy McNulty. And we are here to listen to your thoughts, concerns regarding the policy, the radon policy, and respond to questions. There is a short overview in the very beginning that explains how we got here and explains the policy and some other pertinent information. And then the listening part of the session will begin.

During this first presentation part, the chat is open for comments and questions and thoughts and concerns. And then when the overview ends, the audio will be, everyone will be unmuted and anyone who wants to speak can raise their hand or, and just voice their concerns or thoughts.

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So how we got here: the first part of the overview, we're going to talk about the events that sort of prompted the development of HUD's departmental radon policy. The next couple of slides we'll explain what's in the policy, the language of the policy itself, and then there'll be some slides on how to document the environmental review and some strategies that can be used in order to ensure that projects comply with this overall departmental policy.

So how we got here: in 2020, HUD's Office of Inspector General conducted an evaluation of HUD's program offices' radon policies. And from this evaluation, the OIG determined that HUD does not have an overall department-wide radon policy that governs operations for all the programs, all HUD programs. And the lack of this overall department-wide policy has resulted in program office policies that are inconsistent. And as a result of this inconsistency, HUD cannot ensure that residents in HUD-assisted housing are protected from exposure to high radon levels. Also, having these inconsistent policies does not align with HUD's environmental regulations.

And then the OIG further noted that HUD does not proactively track radon data for HUD assisted housing. So that's the event that started this process.

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So to resolve these inconsistencies, the OIG recommended that OEE issue a department-wide radon policy that confirms that radon is included in the definition of toxic and hazardous substances as that is described in HUD's contamination policy. And that the department-wide policy should include radon testing and mitigation requirements that apply to all HUD programs.

And then furthermore, and HUD should use HEROS to track radon testing and mitigation data in HEROS. So I note here though that HEROS is not yet mandatory for documenting environmental reviews that are subject to Part 58 and this policy would not implement any requirement to do so.

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Just as a refresher, here is HUD's contamination policy. In the first section, it specifically references radioactive substances. In this next section, the policy also notes that projects that involve multifamily housing or project-based vouchers must evaluate other evidence of contamination on or near a project site. And it provides that under Part 58, the responsible entity is responsible for making the determination of the investigations necessary to document that a site is suitable for the proposed use and that it's free of contaminants, toxic chemicals, and gases that could affect the health and safety of occupants.

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So this is a graphic of radon, a little reminder of what radon is. Radon's a radioactive gas that forms when radium and other radioactive metals break down in rocks, soil water. It can be found all over the United States. And as a gas it can infiltrate buildings in many ways, generally through small or large openings in foundations through crawlspaces, cavities, basement windows, elevator shafts. So as it permeates the building, the fresh air pressure in the building is what causes the radon gas to rise and move up through the home.

The predominant source of radon is soil, gas, water, and emanation from building materials is another, more rare source.

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So in response to OIG's recommendations, the Office of Inspector General's recommendations, OEE proposed a two step approach. A resolution: in the first step, OEE will develop a department-wide policy that identifies radon as a radioactive substance and requires radon to be considered as part of the contamination analysis for activities that are categorically excluded, subject to 58.5 activities that require an environmental assessment and activities that require an environmental impact statement.

So just a reminder that activities categorized as subject to 58.5 levels of review are your rehab, replacing the roof floor, kitchen, bath, kitchen cabinets, bathroom fixtures, stairwells and so forth.

As a second step, HUD is committed to OIG to develop radon testing and mitigation requirements. But that will be done through rulemaking at a later time.

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So this consultation period and this listening session are all about step one, HUD's decision to implement the department-wide radon policy. Because the policy does not implement specific testing and mitigation requirements at this point, this policy notice also includes guidance on how to document in the environmental review that radon was considered, it was evaluated and that the project complies with the policy.

So in essence, the department-wide policy states that the contamination policy includes radioactive gases in the list of contaminants that a property must be free from. Because radon is a radioactive gas, it must be considered as part of the contamination evaluation. The contamination evaluation applies to categorically excluded subject to 58.5 environmental assessment and environmental impact statement levels of review.

Therefore, in order to comply with HUD's contamination policy, radon must be considered as part of the contamination analysis. And that consideration must be documented in the environmental review. So that's how we got to our listening session and policy today.

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So as I noted, HUD has identified some strategies that can be used to document radon was considered. And one of the things we are interested in this listening session and in the comments moving forward is what other strategies have been used or could be used to document that radon was evaluated?

So the best practice for measuring the level of radon in indoor air is using a test standard. The current industry standard is ANSI/AARST testing standard. So ANSI is the American National Standards Institute private, nonprofit organization that oversees the development of voluntary consensus standards and AARST is the American Association of Radon Scientists and Technologists. It's a non-profit, professional organization and its focus is on radon measurement and providing that information to the public.

Because the ANSI/AARST standards were developed through a voluntary consensus process, which included the EPA, the EPA was able to use the

ANSI/AARST standards in lieu of developing a separate federal radon testing and mitigation standard.

So those testing standards are available on the EPA's radon website and the ANSI/AARST standard website. And they're free reviewing.

When testing is not otherwise required by the tribe, another alternative strategy is that the EPA's radon zone map could be used to determine whether the project site is located in an area that may be impacted by high radon levels, together with any test data that the tribe, state, or county may have collected about test data in the area and the CDC test data, those would work together to evaluate whether the site is impacted by high radon levels.

Excuse me for one moment.

If there is no other information other than the EPA's radon zone maps, then that's all there is and that's what we document in the environmental review.

So there's the best practice, which is the testing and mitigation standards and then there's an alternative strategy for looking at maps to determine whether the area is subject to high radon levels. I would note here though that using maps does not establish whether radon levels in a particular building are high. It just helps us evaluate whether or not there is the potential.

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Other testing strategies in addition to the ANSI/AARST standard is the do-it-yourself test, which can be used for single-family housing, used by tenants in multifamily to test their units. These are available for low cost from the State or from the National Radon Services Program. And we have a list of resources in one of the last slides.

These do-it-yourself testing devices come with instructions and the EPA citizen guide also provides detailed instructions about how to use the device, how to document your test and where to locate the devices.

And then there have been some tribes that have purchased a continuous radon monitoring device, had staff become proficient with using the testing device and so doing their own testing. So that's another testing strategy.

The National Radon Proficiency Program lists measurement devices that meet certain quality assurance standards. So if you are ever looking for a test device and you want to understand whether it's a good device or not, that is one resource to refer to.

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So once you have your strategy and you've evaluated whether a particular building is impacted by high levels of radon, we want to document that evaluation in the environmental review. That evaluation should be documented before the environmental review is signed and before the release of funds is submitted to HUD. If you're using the ANSI/AARST standard, the standard contains detailed instructions on how to document the test plan, and then documenting the test results.

For do-it-yourself test devices and other radon monitoring test devices, you would want to document the type of device that you use, the time frame of the test, the test conditions: were all the doors closed, windows closed, HVAC shut off, those sorts of conditions. And then document the radon test results from the lab. Or the alternative strategies where you're looking at science-based information such as the EPA's radon zone maps or test data that has been collected through either testing in your area or testing or CDC testing, you would want to document the sources, include a citation to the source, copies of the maps that were used if, you spoke with individuals and contact number credentials and title.

And then if the evaluation determined that the area was subject, or potentially subject to high impact, high radon levels, then a mitigation plan should, it needs to be developed.

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So mitigation plans, if the alternative strategy determines the project site's located in an area with high radon levels, or test results are 4 picocuries per liter or higher, the next step would be to develop a mitigation plan. The plan should establish a reasonable timeframe for implementation, document the implementation plan in the environmental review record, how that plan, how the mitigation will be carried out, what kind of mitigation, the system that will be installed. And then the mitigation plan is documented in the environmental review prior to signing the review and prior to submitting the request for release of funds to HUD.

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So the next two slides are about two different project types and the decision tree that you would go through. So for new construction and reconstruction, testing is really not an option until after the project is implemented because you need a building to test. So the test plan would have to be developed and documented in the environmental review as mitigation prior to signing the environmental review and prior to submitting the request for release of funds to HUD.

Once the project's completed, and if it's new construction, it would be before occupancy, the testing would take place to determine whether or not the building is impacted by high radon levels.

High radon levels are radon levels that test at four picocuries per liter or higher according to EPA's recommendations. And if the radon is high, then we must mitigate and document that mitigation plan in the environmental review record.

For new construction and reconstruction and when testing is not feasible and you're using the alternative strategy of looking at EPA maps and CDC maps of the area, then that alternative strategy, the results of that strategy would be documented in the environmental review before it's signed, before the request for release of funds is submitted to HUD. If the project site is in an area with high radon levels, then the environmental review should document the mitigation plan that would be undertaken.

There's two choices: HUD recommends using radon on resistant new construction strategies that could, if a project could potentially be impacted by high radon, having radon-resistant new construction can result in a lower cost of mitigation post new construction. Or, you can wait until the building is constructed and then just test after that. And if it tests high radon, put in a radon reduction system.

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For rehab projects using the radon test option, testing occurs during the project. Testing and mitigation are eligible program costs and are part of a project cost. So the testing would occur during the project, conduct the test. If the test levels are high, then the project would include a mitigation plan in the environmental review record.

I see an error here. So, yeah, you would conduct the radon test as part of the project and then as part of the project, once the test results are received, you would develop a mitigation plan and implement that mitigation. That would be after the request for release of funds because you would've already done it. So apologies for that.

Alternative strategy, if you're using the alternative strategy, it's similar. You would review the available data, the radon zone map, the CDC maps. If the project is in an area with high radon levels, develop a mitigation plan, document that mitigation in the environmental review record prior to signing the environmental review and submitting the request for release of funds to HUD.

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This is a list of resources that are relevant to the information provided. The first link is to the EPA radon zone maps. The second link is to the ANSI/AARST radon

testing mitigation standards. The National Radon Program Services is a EPA-funded organization that has a hotline that people can call when they need information about how to test, should they test, what kind of mitigation.

The National Proficiency Program is the program that provides the list of approved test devices.

CDC, this is the link to their radon testing maps there. Right now, the CDC information is limited in its geographical reach, but it's worth taking a look at to see if your area's in that mapping.

And then HUD held the three-part radon webinar series last year. It goes through single family and multi-family, right? It talks about radon, how to handle testing, how to do mitigation.

And then Radon Leaders Saving Lives is an organization that offers testing, testing courses where you can attend and learn how to conduct radon testing. I believe.

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So that's the end of the presentation part. HUD is very interested in learning about the following: what concerns do you have about implementing the proposed radon policy? What specific guidance would help you to successfully identify and mitigate radon? What experiences you have had in evaluating radon and implementing mitigation and what have been roadblocks that you've encountered to successfully evaluating that radon risk and implementing mitigation? And any other ideas, concerns, comments you have regarding HUD's radon policy. The email where you can send comments if you wish, is the environmentalplanningdivision@hud.gov. And we are requesting comments by December 3rd.

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So the next steps for HUD is there is a second virtual listening session next Thursday from four to five. December 3rd, the comment period ends. OEE will start working through comments and revising the draft. During this period of time in this consultation period. Simultaneously, the notice will go through a public comment and when it's published in the federal register for that public comment announcement will be sent out to everyone so that you have the opportunity to submit comments to that process as well.

The draft radon policy is currently posted on Code talk and ONAP's Environmental Review Resources webpages. The links are in the slides. These slides will be available when the listening session is posted. And this listening session will be recorded. And chat comments and other comments will be recorded, written down, noted.

And so with that we'll begin the listening session and invite anyone who would like to offer comments, have questions, concerns to voice them.

Thank you very much. All right, Kathy,

Kristin Fonteno...: I do see one question. Oh, I'm sorry. Go ahead.

Speaker 1: As we move into the listening session of today's call, please press the raised hand icon on your screen to enter the question queue. You'll hear a beep tone when your line is unmuted. At that time, please then state your name and comment. Once again, clicking the raised hand icon located at the top right above the chat panel will place you in the question queue. We are also accepting comments and questions through chat.

And we have one already. A caller asks, "Is this the second virtual listening session? Is the second virtual listening session the same as this one or part two to this one?"

Kathy McNulty: It is the same presentation, and the same listening session. So no, this is not a part two. But you are welcome to join.

Can we back up the slide to slide 17? Yeah, that slide. So that we have the questions. Thank you.

Speaker 1: Thank you. All right. We have no questions in the queue at this time, but just as a reminder, if you would like to ask a verbal question, you can press the raised hand icon. It is located at the top right just above your chat panel. And if you would like to submit a written question, you can select all panelists from the drop down menu in the chat panel.

And it looks like we have one person who has raised their hand. Caller, you are now unmuted. You can go ahead.

Valerie Powell: Yes, this is Valerie Powell and we just want to make sure that we can use that alternative strategy of pulling up the radon zone map in order to determine if it's in a high potential zone level?

Kathy McNulty: Sorry, yes, alternative strategies available for use.

Valerie Powell: Okay. And so for potentially, if Oklahoma does not have high radon levels, then we would just potentially submit that copy of that map along with that documentation in with our environmental reviews?

Kathy McNulty: That is correct.

Valerie Powell: Thank you.

Kathy McNulty: You're welcome.

Speaker 1: Thank you very much. We've got another question in the verbal queue. Caller, you are now unmuted. You can go ahead.

Wayne Isaacs: Okay. This is Wayne Isaacs with the Cherokee Nation. And I had a question regarding on new construction, if you could go back to that slide?

Kathy McNulty: It would be slide 14, I believe.

Wayne Isaacs: Yes. Now are you suggesting to go ahead and build the unit and then test for radon?

Kathy McNulty: So for example, if this were to be new construction of a single-family dwelling you would not be able to test for radon until after the building was built. So in order to ... So that what we would do is document the test plan, the plan that you plan the whatever, however you plan to carry out the testing host project. You would document that plan in the environmental review and then sign the environmental review if you needed to submit the request release funds to HUD. And then once the project, once that dwelling, that home is built, then you would test the indoor air and document the test results in that environmental review.

Wayne Isaacs: Wouldn't it be a better approach if you looked at your radon zone maps and if it was in a high zone just to go ahead and put a passive unit in at the time of new construction rather than going in and putting in a unit after the home is built? It's a big difference in cost.

Kathy McNulty: Right, that's what we recommend. HUD recommends, strongly recommends that you use radon-resistant techniques because it does reduce, in most cases, the post mitigation costs.

Wayne Isaacs: Oh, and I have one other question, if I may. In the draft, it talks about exemptions and it said buildings that are not residential and will not be occupied for more than four hours per day. So if we have a commercial building that receives HUD funding, then we're required to test those buildings as well? Am I reading that correctly?

Kathy McNulty: So the industry's standard is that if a building is not going to be occupied for more than four hours a day, that you don't need to test for radon. So that means, so if you're building a building and it's not going to be occupied, if it's going to be occupied for more than four hours a day, you would test the building. If it was going to be occupied for less than four hours a day, you wouldn't need to test. You could still test as a precaution, but it's not an industry standard.

Wayne Isaacs: So if we had a satellite office and that was lease property, how would we approach that?

Kathy McNulty: So when we get into specific project questions, I'm wondering if we should table those and for speaking with the local environmental field office for specific sites. So the industry's-

Kristin Fonteno...: And I would just, if I could just add, Kathy, to that, I think that's a great question. And I think what it begs for us is to clarify what that looks like in terms of our guidance. So I think it's a great question about leases and I appreciate that you brought it up.

Speaker 1: All right. We have one more question in the queue, but we also have some questions coming in through the chat. A caller says, "In the notice draft, page five, paragraph two, contact the National Radon Services Program. I think this needs to be National Radon Program Services with mock websites, need to verify the correct website name listed. Please confirm if you can."

Kathy McNulty: We will check that, definitely, and correct it.

Speaker 1: All right. And one more in the chat. A caller comments, "The EPA radon maps do not have a key to help the viewer understand what the zones that are identified in the map designate."

Kathy McNulty: Yes, I noticed that myself. Red is zone one. So red means high radon levels. Yellow is moderate. No, I know red is high radon level. I would have to see the BPA map before I can, but we will make that, that's a good point, actually an excellent point. And we will include that in the guidance, a key to the EPA radon zone map.

Speaker 1: All right. And we have another question in the verbal chat. Caller, you are unmuted. You can go ahead.

Sean West: Hi, this is Sean West. I was calling into just, I had kind of a comment about a little vagueness, I guess. But by just saying high radon levels, does that mean only zone one counties or ZIP codes? Or does that mean, because zone two could also have high radon levels and zone three could have high radon levels. So do you see what I'm saying as far as high radon levels? I'm not sure if you need to put a different kind of wording in there instead of high radon levels.

Kathy McNulty: That's a great point, and we will clarify that in there.

Sean West: Okay. And so back to my understanding of what we're talking about here. If it's not in a quote, "high radon zone," or a zone one, are those the only houses that have to be tested or do all houses need to be tested? Or we're just testing areas that might have a potential for a high radon?

Kathy McNulty: So that speaks to, maybe the policy is vague in that and it should be more clear about between using the alternative strategy and a test strategy.

Sean West: Because it seems to me if you used the alternative strategy then you're saying, "Well, those houses are all positive, then you would test all of them." If the alternative strategy where if you used the other one, you would have to test every one of them too in the other one because you don't know whether they're high or not, in high zone or not. So, if you see what I'm saying?

Kathy McNulty: Yeah, I do understand what you're saying. I understand what you're saying. And that is correct, that even the EPA map does note that even homes in the moderate and low radon zones could be impacted by high radon.

Sean West: I'm just not, I just make wanted to make sure that we didn't miss somebody because we just picked a zone or a color. And that's kind of the way that we do our testing here. Okay. That's all. That's my question.

Kathy McNulty: Thank you.

Speaker 1: All right. There are no further questions in the chat or the verbal queue at this time. Just as a reminder, if you would like to enter the verbal question queue, you can press the raised hand icon on your screen. It is located at the right, just above the chat panel.

If you would like to submit a written question through the chat, select all panelists from the drop down menu, enter your question in the message box provided and send.

All right, there are no further questions in the queue at this time.

Oh, we've had one more question enter the queue. Caller, your line is unmuted. You may go ahead.

Valerie Powell: Hi, this is Valerie with Choctaw Housing again. I just want to make sure I clarify on the, you are going to clarify as far as on the maps, if we're using the alternative maps and if we're not in a zone one, we're not going to test? We're going to use that map as the verification that it's in a low radon level area?

Kathy McNulty: So the policy is that there's two choices. There's the choice where the responsible entity, the Tribe, could, the TDHE could conduct testing, could decide to test. If testing is not feasible, then there is this alternative strategy of looking at the radon maps and science-based information.

So maybe we need to clarify in the notice that these are two clear choices and how those choices might be made. Because if you can test, if testing is feasible, HUD of course, recommends testing. But the alternative strategy is when testing

is not feasible because we've learned that there are many places where it's been not feasible.

So thank you for that comment and we'll try to clarify that in the notice.

Speaker 1: Thank you very much. Just one more reminder, if you would like to make a question or comment, you can either put it in the chat or press the raised hand icon above the chat panel.

There is a comment in the chat. A caller says, "The EPA radon zones spreadsheet identifies the radon zone descriptions with pCi/L levels."

Kathy McNulty: Thank you.

Speaker 1: And one question in the verbal queue. Caller, you are now unmuted. You may go ahead.

Shannon Ray Nag...: Yeah, this is Shannon Ray Nago with the Aleutian Housing Authority in Anchorage, Alaska. I'm more wondering about areas that are unmapped. So for other regulations and things like wetlands and flood plains, we deal with a lot of areas that are unmapped. And I haven't had a chance yet to really look through all the radon plans that are available through the EPA. But I didn't see anything about if an area is unmapped. I mean that kind of also speaks to your comment about areas where it's not feasible to test. Because we have a lot of remote regions in our area. And so I just wanted to basically bring that up and wondered if there was a solution for that or if you guys were at least had that in your thought process? Thank you.

Kathy McNulty: Thank you for the comments. Yeah, we can clarify that in the policy notice to include areas that are unmapped as one of those instances where testing may not be feasible.

Speaker 1: All right, thank you very much. There are no other questions in the queue at this time.

We do have a couple comments popping into chat, actually. A caller asks, "Any thoughts about migration strategies if the house does test high for radon? Oklahoma does not have any radon mitigators available."

Kathy McNulty: We have been thinking about that in the radon policy and that's a great point. So thank you. We know that there are areas of the country where it's just not possible to have a radon professional come to the project site. And so we are working on developing all strategies and resolutions for that problem. So thank you. And we will incorporate that.

Speaker 1: Another caller asks, "I hear you said recommended, but not mandatory. Will there be any situation for mandatory testing?"

Kathy McNulty: So the Office of Inspector General, HUD's resolution for that was step one was to develop this departmental radon policy with some guidance on how to evaluate radon during this interim period. At a later date after the policy, after we finished developing the policy, HUD will be working on a radon testing and mitigation rulemaking. That rulemaking will also go through a formal rulemaking with public comment and notice period and tribal consultation. That is in the works. But at this moment, HUD is not recommending and does not require any specific testing and mitigation strategies in the policy notice.

Speaker 1: There are no other questions in the queue at this time, but just as a reminder, you can either submit to enter the verbal question queue through pressing the raised hand icon or submit a question or comment through the chat. All right. There seemed to be no other questions or comments popping up at this time.

One other question has entered the verbal queue. Caller, you are now unmuted. You may go ahead.

Valerie Powell: Yes, this is Valerie Powell. We were wondering how often do you have to do the test, the radon testing? Is it just once, or every five years with the environmental process or? We just wondered.

Kathy McNulty: I think I couldn't hear part of your question. But I think it had to do with how often radon testing is required. Is that right?

Valerie Powell: Yes.

Kathy McNulty: Okay. It's a great question and HUD doesn't have any standard in the policy notice right now for that. But we will take that under consideration because that's an excellent point. Or that might be subject matter for the future rulemaking. But thank you for asking that.

Kristin Fonteno...: [inaudible 00:47:14] good question.

Kathy McNulty: I would add that if you're looking for guidance on that until HUD has issued any, you can look at the ANSI/AARST standards. They include very detailed guidance on testing and when to retest and that sort of information. So if you're currently concerned and want to develop a strategy.

Speaker 1: Okay, there are no further questions in the queue at this time. So with that, I'll turn it back over to Kathy McNulty to conclude our conference.

Kathy McNulty: Okay. Thank you all. I greatly appreciate all the comments that we've received, they're really important for us for developing HUD's departmental radon policy. I would ask that if anything comes to mind during this comment period, even after you leave this listening session, please feel free to send those comments to that environmental planning division email address at hud.gov. We are very interested in developing a policy that's implementable, that's clear, that can be

used by grantees and HUD recipients in all situations that they are faced with when trying to develop affordable housing. So thank you very much for your time today and for engaging with us on this.

Kristen, did you want to ...

Kristin Fonteno...: This was a wonderful hour together. Thank you. The comments were excellent and we will certainly use them and others we may receive next week during the second listening session to further improve the draft that you saw in front of you. So thank you very much.

Speaker 1: All right. Thank you very much. That concludes today's conference. You may now disconnect.