



OFFICE OF HEALTHY HOMES AND  
LEAD HAZARD CONTROL

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-3000

MEMORANDUM FOR: Matthew E. Ammon, Director, Office of Lead Hazard Control and Healthy Homes, L

FROM: Peter J. Ashley, Director, Policy and Standards Division, LP

SUBJECT: Environmental Assessment and Finding of No Significant Impact under the National Environmental Policy Act – Notice of Funding Opportunity for Fiscal Year 2021: **Healthy Homes and Weatherization Cooperation Demonstration Grant Program (FR-6500-N-62)**

It is the finding of this office that the publication of the attached Notice of Funding Opportunity (NOFO) for the Healthy Homes and Weatherization Cooperation Demonstration Grant Program described by the attached funding notice (FR-6500-N-62), does not constitute a major federal action having an individual or cumulative significant effect on the human environment, and therefore does not require the preparation of an Environmental Impact Statement.

The notice sets out the guidance to govern the Healthy Homes and Weatherization Cooperation Demonstration Grant Program. The program is authorized under sections 501 and 502 of the Housing and Urban Development Act of 1970 (12 U.S.C. §§ 1701z-1 and 1701z-2). Funding is provided by the Consolidated Appropriations Act, 2021, P.L. 116-260, approved on December 27, 2020.

The Healthy Homes and Weatherization Cooperation Demonstration Grant awards will be in the form of cooperative agreements with applicants in one or more of the following categories:

- County governments
- State governments
- City or township governments
- Special district governments
- Public and State controlled institutions of higher education
- Nonprofits with or without a 501(c)(3) status with the IRS, other than institutions of higher education
- Private institutions of higher education

The purpose of the program is to support demonstrations of programs that provide housing interventions in lower income households that are conducted jointly through coordination of HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH)-funded Lead Hazard Control/Healthy Homes programs and Weatherization Assistance Program (WAP) grantees or sub-grantees funded by the U.S. Department of Energy (DOE) to determine whether this coordinated

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delivery of services achieves cost effectiveness and better outcomes, including resident health, in improving the safety and energy efficiency of homes. The coordination assessments and interventions are expected to provide additional benefits to households through the combined mitigation of health and safety hazards and improvements in energy efficiency and comfort. The overall major goals and objectives of the Healthy Homes and Weatherization Cooperation Demonstration program are to:

- Demonstrate effective strategies for coordination between Lead/Healthy Homes (LHH) and Weatherization programs that maximize program efficiencies and benefits to occupants.
- Reduce Weatherization Assistance Program (WAP) deferrals through coordination with LHH programs.
- Demonstrate sustainable models of inter-program cooperation, including data sharing, reporting, and targeting/recruiting clients.
- Demonstrate effective models for the sustainable financing of coordinated healthy homes/weatherization interventions.
- Support the collection of data to evaluate the housing interventions supported through this NOFO (e.g., program efficiencies that can be achieved, improvements in indoor environmental quality, improved health outcomes, additional benefits to households).

Eligible Healthy Homes and Weatherization Cooperation Demonstration Program activities include:

- Grant administrative costs including direct administrative costs that are necessary, allocable, and otherwise allowable costs of general management, oversight, and coordination of the grant.
- Identification and remediation of housing-related health and safety hazards such as lead-based paint hazards, radon, pest infestation, mold and moisture, and injury hazards that are identified during the home assessment. (Note: Total costs related to the assessment and control of lead-based paint and other housing-related hazards are limited to an average of \$15,000 per home. If no lead-based paint hazards are identified in a home this total can be applied to the mitigation of other residential health and safety hazards).
- Conducting energy audits and the implementation of energy conservation measures and the remediation of weatherization-related health and safety hazards. (Note: Costs related to these activities are limited to an average of \$8,000 per home).
- The maximum amount of grant funds that can be used for all hazard control and energy conservation activities in a single housing unit is \$23,000 unless written approval is received from the HUD Government Technical Representative.
- Conducting sampling and analysis for lead, carbon monoxide and/or other housing-related health and safety hazards as appropriate, following established protocols and procedures when possible. Residential paint, soil or dust samples to be analyzed for lead

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must be analyzed by a laboratory recognized by the U.S. Environmental Protection Agency's (EPA's) National Lead Laboratory Accreditation Program (NLLAP) ([epa.gov/lead/pubs/nllap.htm](http://epa.gov/lead/pubs/nllap.htm)) with the recognition under NLLAP applicable to the medium analyzed. Samples to be analyzed for mold must be submitted to a laboratory accredited by the Environmental Microbiological Laboratory Accreditation Program (EMLAP), administered by the American Industrial Hygiene Association (AIHA) Laboratory Accreditation Programs, LLC.

- Re-evaluation or clearance of the remediation activities being completed.
- Conducting evaluation of the project through data collection, analysis, and reporting. This includes compiling and delivering such data as may be required by HUD.
- Providing HUD-approved training of applicant's staff and partners on key healthy homes activities such as conducting integrated homes assessments and evidence-based interventions to address identified healthy homes hazards.
- Providing DOE-approved training for weatherization-related activities such as conducting energy audits and implementing energy conservation measures. Providing the training for Quality Control Inspector (QCI) certifications for staff and partners
- Conducting targeted outreach, affirmative marketing, or education that help promote participation in the demonstration and further the goal of protecting children and adults from exposure to residential health and safety hazards and improving energy efficiency.
- Securing liability insurance for housing-related environmental health and safety hazard evaluation and control activities.
- Purchasing resident supplies, to include "respiratory friendly" cleaning supplies, integrated pest management kits, or household safety items as required with the identified housing related health hazards and direct intervention activities.

An award under this NOFO does not constitute approval of specific sites where activities that are subject to environmental review may be carried out. The provisions of section 305(c) of the Multifamily Housing Property Disposition Reform Act of 1994, implemented by HUD regulations at 24 CFR part 58, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities, are applicable to properties assisted with the Healthy Homes and Weatherization Program Cooperative Demonstration. Therefore, recipients conducting eligible construction and rehabilitation activities must comply with 24 CFR part 58. Recipients that are States or units of general local government must carry out environmental review responsibilities as a responsible entity under part 58. Recipients that are academic, not-for-profit, for-profit institutions or specialized units of local government must contact and partner with a non-recipient responsible entity, usually the unit of general local government, to assume the environmental review responsibilities for construction or rehabilitation activities funded (in whole or in part) under this NOFO. Reasonable expenses incurred for compliance with these environmental requirements are eligible expenses under this NOFO. Under 24 CFR 58.11, where the recipient is not a State or unit of general local government, if a responsible entity objects to performing the environmental review, or the recipient objects to the responsible entity performing the environmental review, HUD may

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designate another responsible entity to perform the review or may perform the environmental review itself under the provisions of 24 CFR part 50. When HUD performs the review itself, following grant award execution, HUD will be responsible for ensuring that any necessary environmental reviews are completed.

For all grants under this NOFO, recipients and other participants in the project are prohibited from undertaking, or committing or expending HUD or non-HUD funds (including leveraged funds) on, a project or activities under this NOFO (other than activities listed in 24 CFR 58.34, 58.35(b) or 58.22(f)) until the responsible entity completes an environmental review and the applicant submits and HUD approves a Request for the Release of Funds and the responsible entity's environmental certification (both on Form HUD-7015.15) or, in instances where the recipient is not a State or unit of general local government and HUD performs the environmental review under part 50, HUD has completed the review and notified the grantee of its approval. The results of the environmental review may require that proposed activities be modified, or proposed sites rejected.

The Office has considered the potential environmental impacts of the (above) listed eligible activities of the notice and determines that they generally fall into one of two categories, either categorically excluded from review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 *et seq.*) and subject to the related federal laws at 24 CFR §§ 50.4 and 58.5, per §§ 50.20(a)(2) and 58.35(a)(3), or categorically excluded and not subject to the related federal laws, per §§ 50.19 (b)(1), (3), (4), (5), (6), and (9), and exempt from environmental review, per 24 CFR 58.34 (a)(1), (3), (4), (5), (6) and (9).

The Office included in its analysis the provision of exposure to and disposal of hazardous materials. Waste disposal must be carried out in accordance with the requirements of the appropriate local, state, and federal regulatory agencies. Applicants must handle disposal of wastes from hazard control activities that contain lead-based paint but are not classified as hazardous in accordance with state or local law or the current [HUD Guidelines](#). Worker protection shall be accommodated through adherence to applicable Occupational Safety and Health Administration (OSHA) (e.g., 29 CFR parts 1910 and /or 1926, as applicable), or the state or local occupational safety and health regulations, whichever are most stringent.

Publication of the notice does not provide approval of a major Federal action having a significant impact on the human environment, sets forth the Environmental Requirements under applicable HUD environmental review regulations for individual projects, and provides particular methods and standards by which evaluation and hazard reduction work is to be performed. Before action that could have a physical impact or limit the choice of alternatives may be taken, there will be an environmental review done under 24 CFR Part 50 (by HUD) or 24 CFR Part 58 (by a responsible entity) that will assess the potential environmental impacts in a local setting before the impact or any choice-limiting activities may take place. Accordingly, it is the determination of this Office that a Finding of No Significant Impact may be made.

Attachments

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Concurrences:



Date 6/15/21

\_\_\_\_\_  
for: Karen M. Griego  
Program Environmental Clearance Officer  
Office of Lead Hazard Control and Healthy Homes

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Christopher H. Hartenau  
Environmental Clearance Officer  
Office of General Counsel

Date \_\_\_\_\_

\_\_\_\_\_  
Moriel-Elorm K. Tchaou  
Acting Departmental Environmental Clearance Officer  
Office of Environment and Energy


Date \_\_\_\_\_

Approval:

\_\_\_\_\_  
Matthew E. Ammon  
Director  
Office of Lead Hazard Control and Healthy Homes

Date \_\_\_\_\_

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Name	pja for : Griego	Ashley 				
Date	6/15/21	6/15/21				

Official Record Copy U.S. Department of Housing and Urban Development form HUD-713.1 (02/03) Previous edition is obsolete.