



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

MEMORANDUM FOR: David C. Woll, Jr., Principal Deputy Assistant Secretary  
for Community Planning and Development, D

FROM: Rita Harcrow, Director, Office of HIV/AIDS *RH*  
Housing, DNH

SUBJECT: Environmental Assessment and Finding of No Significant Impact  
Under the National Environmental Policy Act (NEPA) for Notice  
of Funding Availability for Fiscal Year 2020 Housing  
Opportunities for Persons With AIDS  
(HOPWA) Competitive Grant: Housing as an Intervention to  
Fight AIDS (FR-6400-N-11)

It is the finding of this Office that the subject Notice of Funding Availability (NOFA) does not constitute a major Federal action having an individually or cumulatively significant effect on the physical/human environment and, therefore, does not require the preparation of an environmental impact statement.

The purpose of this NOFA is to announce the availability of competitively awarded funding under the authority for HOPWA Special Projects of National Significance and to provide program information and application instructions for the HOPWA Competitive Grant: Housing as an Intervention to Fight AIDS.

The purpose of the HOPWA competitive grant is to provide communities an opportunity to align with initiatives aimed at ending the HIV/AIDS epidemic and elevate housing as an effective structural intervention in ending the epidemic. Grants awarded under this NOFA should exhibit exemplary and/or innovative qualities, including community-level coordination, data collection with emphasis on stable housing and positive health outcomes, and culturally competent approaches to providing housing and services that can serve as a national place-based model. Grants funded under this NOFA will enhance local and federal efforts to end the U.S. HIV/AIDS epidemic.

Each successful applicant under this NOFA will receive a one-time, non-renewable grant to fund housing assistance and supportive services for eligible beneficiaries, coordination and planning activities, and grants management and administration. Reporting requirements under this NOFA are more comprehensive than traditional HOPWA program reporting. Grantees will be required to collect client-level data to produce a programmatic HIV Housing Care Continuum Model at the end of each operating year. Grantees will also develop a Housing as an Intervention to Fight AIDS (HIFA) Model to be issued at the end of the grant period of performance. The HIFA Model document will provide promising practices for and lessons learned in using housing as a structural intervention to end the AIDS epidemic. Each HIFA Model will be shared with the public, and lessons learned through these grantee efforts will help inform national and community policy and actions.

All HOPWA assistance is subject to the National Environmental Policy Act (NEPA) and applicable related federal environmental authorities. Some eligible activities under this NOFA, such as supportive services, operating costs, and administrative costs, are excluded from environmental review under 24 CFR 58.35(b) because of the lack of environmental impact. Other activities require environmental review under 24 CFR 58.35(a) or an Environmental Assessment. In accordance with Section 856(h) of the AIDS Housing Opportunity Act and the HOPWA regulations at 24 CFR 574.510, environmental reviews for HOPWA activities are to be completed by responsible entities in accordance with 24 CFR Part 58. Applicants or grantees that are not a responsible entity must request the unit of general local government to perform the environmental review.

HOPWA grantees and project sponsors may not undertake any actions that are choice-limiting or could have environmentally adverse effects, or commit or expend any grant or non-federal funds on project activities (other than those listed in 24 CFR 58.22(f), 58.34 or 58.35(b)) for which the responsible entity documents its findings of exemption or exclusion for the environmental review record (24 CFR 58.34(b) or 24 CFR 58.35(d)) until HUD has approved a "Request for Release of Funds and Certification" (RROF), form HUD-7015.15, in compliance with NEPA and implementing regulations at 24 CFR Part 58. The recipient, its project sponsors, and their contractors may not commit or expend HUD or local funds for this eligible activity, or undertake any actions that are choice-limiting or could have environmentally adverse effects, until the responsible entity (as defined in 24 CFR 58.2) has completed the environmental review procedures required by 24 CFR part 58, and the environmental certification and the RROF have been approved. Such activities include, but are not limited to, project-based assistance proposed to be assisted with any HOPWA program funds. HUD will not release grant funds if the recipient or any other party commits grant funds (i.e., incurs any costs or expenditures to be paid or reimbursed with such funds) or undertakes choice-limiting actions, before the recipient submits and HUD approves its RROF (where such submission is required). The recipient shall supply all available, relevant information necessary for the responsible entity to perform, for each property, any environmental review required.

This Office finds that issuance of this NOFA will not have a significant effect on the human environment because prior to any grantee's commitment of funds for any activities that would have an environmental impact or limit the choice of reasonable alternatives, an environmental review of these activities under the NEPA and related laws and authorities will be done. Thus, the environmental effects of activities assisted under this NOFA will be taken into account at the appropriate time, and environmental impacts will be assessed in the local setting in which they will occur.

Concurrences:

*Danielle Schopp*

Danielle Schopp  
Environmental Clearance Officer  
Office of Environment and Energy

1/29/2020  
Date

*Danielle Schopp*

1/29/2020  
Date

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Lauren McNamara  
Environmental Clearance Officer  
Office of Community Planning and  
Development

*Chris Hartenau*

2/11/2020  
Date

Chris Hartenau  
Environmental Clearance Officer  
Office of General Counsel

Approval:

*John Bravacos*

2/12/2020  
Date

John Bravacos  
General Deputy Assistant Secretary  
for Community Planning and Development