



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

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

February 28, 2022

MEMORANDUM FOR: Jemine A. Bryon, Deputy Assistant Secretary, Office of Special  
Needs, DN

A handwritten signature in black ink, appearing to read "Norm Suchar".

FROM: Norm Suchar, Director, Office of Special Needs Assistance  
Programs, DNS

SUBJECT: Environmental Assessment and Finding of No Significant Impact  
under the National Environmental Policy Act (NEPA) - Notice of  
Funding Opportunity for the Fiscal Year (FY) 2021 Youth  
Homelessness Demonstration Program (FR-6500-N-35)

It is the finding of this office that the Youth Homelessness Demonstration Program (YHDP) Notice of Funding Opportunity (NOFO) does not constitute a major Federal action having an individually or cumulatively significant effect on the human environment, and therefore, does not require the preparation of an environmental impact statement.

The purpose of this NOFO is to select up to 25 communities to develop and execute a coordinated community approach to preventing and ending youth homelessness and to provide program information and application instructions for the YHDP Program. The funds announced in this NOFO were authorized by the Consolidated Appropriations Act, 2021 (Public Law 116-260), approved December 27, 2020. Projects awarded under the YHDP may be eligible for renewal under the Continuum of Care (CoC) Program when the initial grant term expires. The CoC Program is authorized by subtitle C of Title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381-11389) (the Act), and the CoC Program regulations are found in 24 CFR Part 578 (the CoC Program interim rule).

The purpose of the YHDP is to learn how communities can successfully approach the goal of preventing and ending youth homelessness by building comprehensive systems of care for young people rather than implementing individual or unconnected projects that serve this population. Eligible activities include: new construction, rehabilitation, acquisition, rental assistance, leasing, supportive services, operating, HMIS, and planning.

Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat. 405), activities under the YHDP NOFO are subject to environmental review by a responsible entity under 24 CFR Part 58. For activities under a grant to a Project Grant Recipient other than a responsible entity (a State, Tribe, or unit of general local government) that generally would be subject to review under Part 58, HUD may make a finding in accordance with 24 CFR 58.11(d) and may itself perform the environmental review under the provisions of 24 CFR Part 50 if the Project Grant Recipient objects in writing to the responsible entity's performing the review under 24 CFR Part 58.

Some activities funded under this NOFO are categorically excluded from review under NEPA and not subject to the related laws and authorities at 24 CFR Part 58.5 (CENST), including tenant-based rental assistance under 24 CFR 58.35(b)(1), clarified to include scattered-site projects where participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites. This includes both tenant-based rental assistance and scattered-site leasing projects where project participants choose their unit. Other CENST program activities include supportive services under 24 CFR 58.35(b)(2), and operating costs under 24 CFR 58.35(b)(3).

Under this NOFO and applicable law, the recipient, its project partners, and their contractors are prohibited from undertaking any actions that are choice-limiting or could have environmentally adverse effects, including: acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a project under this NOFO, or committing or expending HUD or local funds for such eligible activities under this NOFO, until the responsible entity has performed an environmental review under 24 CFR Part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved, if applicable, or HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property. The Department will not release grant funds if the recipient or any other party commits grant funds before the recipient submits and HUD approves its Request a Release of Funds (RROF), if applicable. The environmental review may result in requirements for mitigation or selection of an alternative eligible property or other conditions.

This Office finds that issuance of this NOFO will not have a significant effect on the human environment because, prior to any recipient'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 National Environmental Policy Act (NEPA) and related laws and authorities will be done. Thus, the environmental effects of activities assisted under this NOFO 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:

**LAUREN  
MCNAMARA**

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O = U.S. Government OU = Department of  
Housing and Urban Development, Office  
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Lauren McNamara  
Acting Departmental Environmental Clearance Officer  
Office of Community Planning and Development

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Date

**LAUREN HAYES**

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Lauren Hayes Knutson  
Environmental Clearance Officer  
Office of Community Planning and Development

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Date

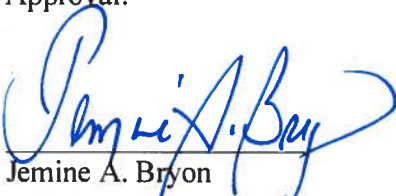
**CHRISTOPHER  
HARTENAU**

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Christopher Hartenau  
Environmental Clearance Officer  
Office of General Counsel

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Date

Approval:



Jemine A. Bryon  
Deputy Assistant Secretary  
Office of Special Needs

3/9/2022  
Date

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Name	Sid Nilakanta	Nili Soni	Tonya Proctor			
Date	SN 2/24/2022	NS 1/4/2022	TP 1/14/22			

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U.S. Department of Housing and Urban Development