



OFFICE OF HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

MEMORANDUM FOR: Julia R. Gordon, Assistant Secretary for Housing-
Federal Housing Commissioner, H

DocuSigned by:
Jeffrey D. Little 1/17/2025

THROUGH: Jeffrey D. Little, Associate General Deputy
Secretary for Housing, H

DocuSigned by:
Ethan D. Handelman 1/17/2025

FROM: Ethan D. Handelman, Deputy Assistant Secretary
for Multifamily Housing, HT

SUBJECT: Environment Assessment and Finding of No Significant
Impact (FONSI) under the National Environmental policy
Act (NEPA) for the Fiscal Year 2025 Project Rental
Assistance Program of Section 811 Supportive Housing for
Persons with Disabilities (FR-6900-N-53)

The attached Notice of Funding Opportunity (NOFO) for the Section 811 Project Rental Assistance Program (PRA) is not a major Federal action that will individually or cumulatively have a significant impact on the human environment. Therefore, an environmental impact statement is not required.

The NOFO announces the availability of Fiscal Year 2025 funding in the Consolidated Appropriations Act, 2022 (Public Law 117-103, approved March 15, 2022), and the Consolidated Appropriation Act, 2023 (Public Law 117-328, approved December 29, 2022) to house persons with disabilities and describes how HUD will provide project-based rental assistance funds to state housing agencies or other appropriate housing agencies to do so. The 811 PRA program supports collaborations with state Health and Human Service/Medicaid agencies and uses the grant funds to provide permanent housing, including supportive services, for extremely low-income persons with disabilities.

Under Section 811 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 8013), as amended by the Frank Melville Supportive Housing Investment Act of 2010 (Pub. L. No. 111-374), which authorizes the 811 PRA Program, state housing agencies select the specific properties to be assisted. HUD does not approve program funding for specific activities or the properties the housing agencies select for funding. Therefore, approval of specific activities or properties does not involve a Federal action, and HUD does not perform any

environmental reviews of the selected sites. However, to ensure that the tenets of HUD's environmental policies regarding NEPA and other HUD environmental authorities are met, the NOFO specifies the following thirteen environmental analyses and determinations that selected housing agencies will be required to implement:

1. Site Contamination
2. Historic Preservation
3. Noise
4. Airport Clear Zones
5. Coastal Zone Management Act
6. Floodplains
7. Wetlands
8. Siting of Project Activities Near Hazardous Operations Handling Conventional Fuels of Chemicals of an Explosive or Flammable Nature
9. Endangered Species Act of 1973
10. Farmland Protection
11. Sole Source Aquifers
12. Coastal Barrier Resources Act
13. Flood Insurance

The NOFO outlines property standards and restrictions for each topic including prohibitions on new construction in wetlands and floodplains, or in locations that would risk listed endangered species or the conversion of productive agricultural properties. The NOFO requires grantees to assess their selected properties for hazards and/or provide an ASTM Phase I Environmental Site Assessment (ESA), as well as an ASTM Phase II ESA when recognized environmental conditions are identified. The NOFO also requires appropriate cleanup of any contamination in accordance with state policies.

The environmental doctrines apply to both existing and new projects. Applicants must implement all of the environmental requirements unless the project meets one of two conditions:

- The property is existing, is currently HUD-assisted or HUD-insured, and will not engage in activities with physical impacts or changes beyond routine maintenance or minimal repairs (but still must comply with Section 20 (Coastal Barrier Resources Act) and Section 21 (Flood Insurance), or
- The project already has environmental clearance under 24 CFR Part 50 or Part 58 as long as the environmental review was completed within 5 years and the project description covers the units proposed to be assisted by the PRA.

Since one exception is limited to projects that have no or minimal physical impacts, and the other covers projects that already had an environmental review, no significant environmental impacts are anticipated from these exceptions.

In addition to the above requirements, all 811 PRA units must meet local and state housing codes, ordinances and zoning requirements and must meet the established minimum HUD National Standards for the Physical Inspection of Real Estate: Inspection Standards for decent, safe, and sanitary housing (88 FR 40832). Assistance in Coastal Barrier Resource System units is prohibited, in accordance with the Coastal Barrier Resources Act.

In light of these requirements, potential environmental impacts resulting from 811 PRA activities will be minimized, and this office concludes that the NOFO will not result in any reasonably foreseeable significant environmental impacts. Since the NOFO will not create any significant environmental impacts and impact of activities stemming from the NOFO will be minimized, the overall action will not result in significant impacts on the physical/human environment and a Finding of No Significant Impact is hereby made.

Signed by:
Jacob Levine
C1C8735E1D1A42A...

1/17/2025

Sara Jensen, Environmental Clearance Officer, Housing

Date

DocuSigned by:
Lauren E Hayes
DBC26F1EE583476...

1/17/2025

Peter Huber, Environmental Clearance Officer

Date

DocuSigned by:
Christopher H. Hartenau
71F45E698ECD4A9...

1/17/2025

Christopher Hartenau, Environmental Clearance Officer, OGC

Date

APPROVAL BY: *Julia Gordon*
A8C102CEA14249A...

1/17/2025

Julia R. Gordon, Assistant Secretary for Housing-
FHA Commissioner

Date

	Internal HUD Distribution:					
	Identification Lines:					
	811 PRA FONSI 2025					
Correspondence Code	Originator HTNC M. Morris	Concurrence HTNC Washington	Concurrence HTNC Dominick	Concurrence HTG Jackson	Concurrence HTG Larson	Concurrence HT Butler
Name	<small>DocuSigned by:</small> Marketta Morris <small>08E51D418F0A4D4...</small>	<small>DocuSigned by:</small> Keatina Washington <small>2B22589360554E6...</small>		<small>DocuSigned by:</small> Jessica Jackson <small>1E847FD58084C18...</small>	<small>Signed by:</small> <i>[Signature]</i> <small>AB673BA0E303AAU...</small>	<small>DocuSigned by:</small> Timothy Butler <small>17F05F758F0C4D7...</small>
Date						
Correspondence Code	Concurrence HT Billingsley	Concurrence H V.Morris				
Name	<small>DocuSigned by:</small> Donald Billingsley <small>233C4B0FF0F8A41...</small>	<small>DocuSigned by:</small> Vance Morris <small>078FC0BB37084DB...</small>				
Date						