




OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

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

March 21, 2023

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

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) 2022 Youth
Homelessness Demonstration Program (FR-6700-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, 2022 (Public Law 117-103), approved March 15, 2022. 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 reject the use of a responsible entity to conduct the environmental review on the basis of performance, timing, or compatibility with objectives in accordance with 24 CFR 58.11 and perform the environmental review under the provisions of 24 CFR part 50.

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 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. 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 non-HUD 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 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:

Kristin L. Fontenot
Departmental Environmental Clearance Officer
Office of Community Planning and Development

Date

Omri Gross
Program Environmental Clearance Officer
Office of Community Planning and Development

Date

Christopher Hartenau
Environmental Clearance Officer
Office of General Counsel

Date

Approval:

Jemine A. Bryon
Deputy Assistant Secretary
Office of Special Needs

Date

Internal HUD Distribution:						
Identification Lines: J:/SNAPS/Final Documents/2023 FONSIs/YHDP FONSI_3-30-23						
Corresponde nce Code	Originator DNSC	Concurrence DGE	Concurrence CAGDB	Concurrence OEE	Concurrence	Concurrence
Name	Caroline Crouse	Omri Gross	Christopher Hartenau	Kristin Fontenot		
Date	CPC 3/30/2023					

Official Record Copy
 form HUD-713.1 (02/03)
 Previous edition is obsolete.

U.S. Department of Housing and Urban Development