



HOUSING AUTHORITY of BALTIMORE CITY

TRANSFORM POE

Poe Homes | Poppleton | Hollins Market
Choice Neighborhoods Initiative

**Request for Proposals
for
Choice Neighborhoods Action Activities**

Submission Due Date: Wednesday, January 15, 2020



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COMMUNITY | CUSTOMER SERVICE | COLLABORATION | COMMUNICATION

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Attachment 1: Choice Neighborhoods Environmental FAQ

Attachment 2: Action Activity Submission Form

Attachment 3: Action Activities Requirements Process: FY 2017 Planning and Action Grantees

The Housing Authority of Baltimore City (HABC) is making a total of \$1,235,000 in funding available for Action Activities to support physical improvements in the Poppleton/Hollins Market neighborhood, specifically community development or economic development projects that enhance and accelerate the transformation of the neighborhood. Expenditure of these funds are subject to HUD review and approval.

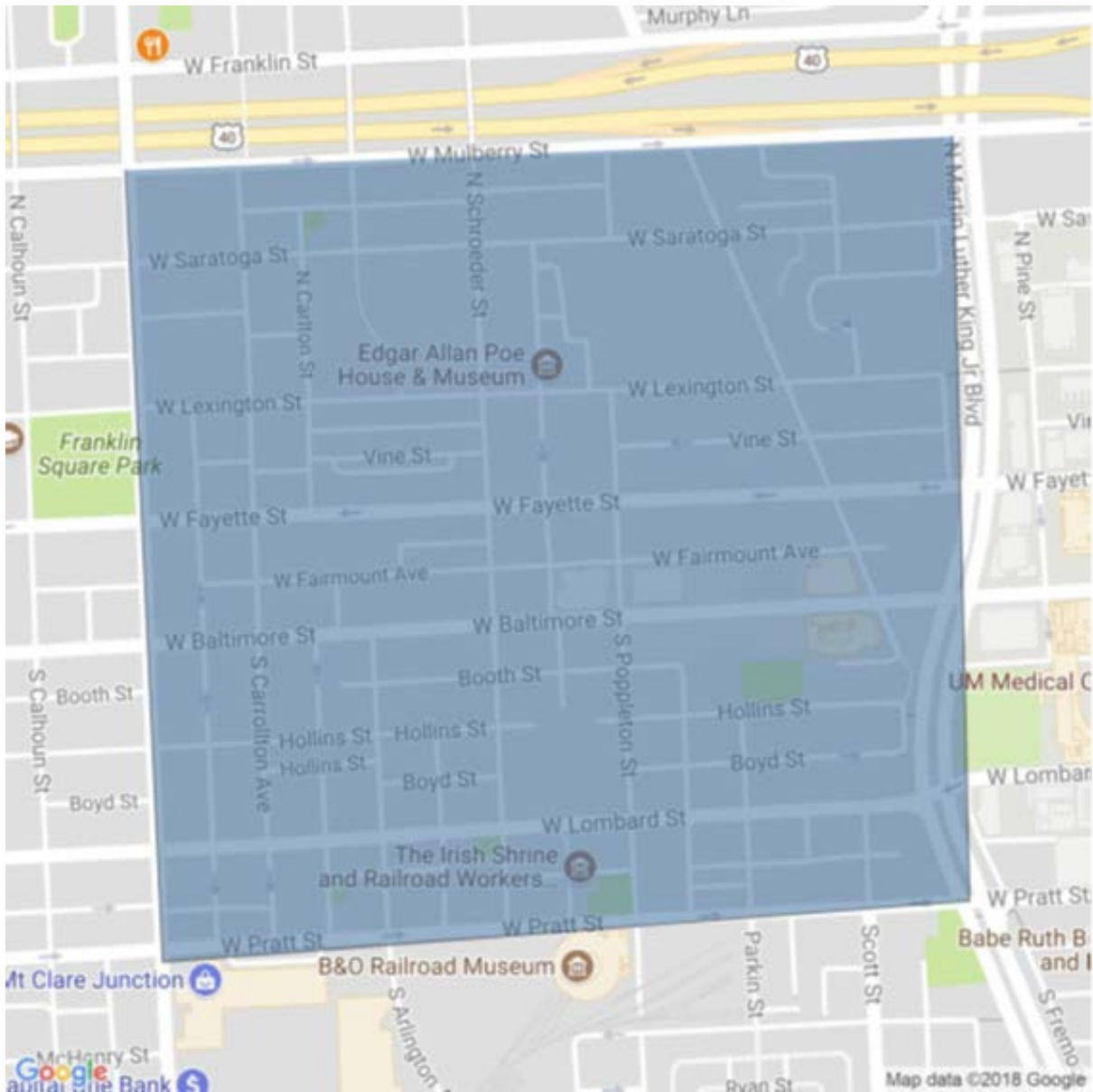
I. Choice Neighborhoods Program Overview

HABC was awarded a Choice Neighborhoods Planning and Action Grant from the Department of Housing and Urban Development (HUD) in September 2018. The grant is intended to support the development of comprehensive neighborhood revitalization plan for the Poppleton/Hollins Market neighborhood to address three core goals:

1. **Housing:** Replace the distressed Poe Homes public housing site with high-quality mixed-income housing that is well-managed and responsive to the needs of the surrounding neighborhood;
2. **People:** Improve outcomes of households living at Poe Homes related to employment and income, health, and children’s education; and
3. **Neighborhood:** Create the conditions necessary for public and private reinvestment in the distressed Poppleton/Hollins Market neighborhood to offer the kinds of amenities and assets, including safety, good schools, and commercial activity, that are important to families’ choices about their community.

To achieve these core goals, HABC and partners must develop and implement a comprehensive neighborhood revitalization strategy, or Transformation Plan. The Transformation Plan will become the guiding document for the revitalization of Poe Homes while simultaneously directing the transformation of the surrounding Poppleton/Hollins Market neighborhood and positive outcomes for families.

The map below shows the boundaries of the Poppleton/Hollins market neighborhood that is the target of this Choice Neighborhoods Planning and Action Grant.



II. Action Activities Funding Opportunity Description

A. Purpose of Action Activities

Neighborhood planning is an important first step in rebuilding community confidence and establishing a shared vision for the future. Over time, the planning process may start to lose momentum and the community, especially communities that have seen plans come and go in the past, may wonder when all this planning is going to turn into results. For this reason, physical improvements and investment actions, even modest ones, help communities build momentum for change and transition from planning to implementation of that plan. These

actions improve neighborhood confidence, sustain the community's energy, attract further engagement, and help convince skeptical stakeholders that positive change is possible.

B. How Action Activities Funds Can Be Used

Action Activities funds **must be used for physical improvements** in the Poppleton/ Hollins Market neighborhood, specifically community development or economic development projects that enhance and accelerate the transformation of the neighborhood. Action Activity funds are flexible funds that must be responsive to the neighborhoods' needs and build upon the Transformation Plan. These funds should be used for innovative solutions to neighborhood challenges and must be used for projects that can be completed by March 4, 2022. Ideally, Action Activities will also build community capacity and social cohesion through the way in which the projects are designed, led, and implemented.

Action Activities funds **cannot** be used for:

- non-physical uses, such as supportive services, administrative costs (e.g., staffing, meeting space), and marketing;
- basic infrastructure or as a substitute for basic municipal services;
- housing development activities (including the public or HUD-assisted housing targeted in this application), such as acquisition, relocation, demolition and remediation, rehabilitation, or construction; or
- the planning and proposal process for Action Activities.

C. Types of Action Activities

Action Activities funds can only be used for the following activity types:

- Reclaiming and recycling vacant property^{1*} into community gardens, pocket parks, farmers markets, or land banking (with maintenance);
- Beautification, placemaking, and community arts projects, such as creative signage to enhance neighborhood branding, murals and sculptures, specialty streetscaping, or garden tool loan programs;
- Homeowner² and business façade improvement programs;

¹ If vacant or other land is acquired with Action Activities funding and that land is eventually repurposed for housing, the property must carry a 20-year affordability restriction of up to 120% of Area Median Income (AMI). In addition, because Action Activities are meant to have a lasting impact, HUD typically does not approve Action Activities that use land on an interim basis, unless it is for the purposes of reclaiming and recycling vacant land.

² Homeowner façade improvement programs may only address the exterior (or façade) of homes. Any interior improvements carry a 20-year affordability restriction of up to 120% of Area Median Income (AMI).

- Neighborhood broadband/Wi-Fi infrastructure and installation (internet service must be paid for by non-Choice Neighborhoods funds);
- Fresh food initiatives, such as farmers markets and mobile fresh food vendors; and
- Gap financing for economic development projects that are ready for implementation and have secured all the necessary financing except a modest "gap".

Proposers may submit an innovative use not listed here if it is consistent with one of the community priorities identified during the planning process. However, ultimately, HUD has the discretion to consider whether that use is allowable.

All Action Activities approved by HUD will be subject to a mandatory Environmental Review before CN funds can be expended (See Attachment 1: Choice Neighborhoods Environmental FAQ).

III. Submission Instructions

Action Activity proposals may be submitted by any individual, organization, business or stakeholder for a physical improvement in the Poppleton/Hollins Market neighborhoods. Any party interested in being considered for award must submit a proposal in accordance with the instructions below.

A. Submission Deadline

HABC must receive the Responder's proposal by Wednesday, January 15, 2019. Proposals which for any reason are not delivered by the deadline will not be considered.

B. Method of Submission

A written proposal, including all required information per the instructions below, must be submitted via email to:

Brian Greenan
Transform Poe Project Manager
Housing Authority of Baltimore City
Brian.Greenan@habc.org

All submittals must reference "Transform Poe-Action Activities Proposal" in the subject line.

C. Questions

Any requests for interpretations or questions concerning this RFP must be submitted via email to Brian.Greenan@habc.org by December 31, 2019. Email inquiries must reference "Transform Poe- Action Activities RFP Questions" in the subject line. Written responses to

all inquiries will be posted on the Transform Poe website at <https://www.habc.org/habc-information/programs-departments/planning-development/transform-poe/> no later than Monday, January 6, 2020.

IV. Submission Requirements

All proposals must include the following:

- Contact Information including name, organization (if any), address, phone and/or email.
- Description of the proposed Action Activity and supporting documentation, as appropriate
- Description of the location of the proposed Action Activity. NOTE: The activity must be in either the greater Poppleton or Hollins Market neighborhoods.
- Description of how the proposed Action Activity addresses at least one of the following community priorities:
 - Improve safety and security
 - Increase economic opportunity
 - Provide new recreational facility or interactive open space
 - Provide neighborhood conveniences and commercial amenities
 - Reclaim vacant or blighted property
 - Be a Fresh Food initiative
- Description of how the proposed Action Activity leverages other activities/investments in the community
- Description of how the proposed Action Activity involves residents and/or builds community capacity
- Identification of the lead implementation entity and any other key partners who will assist with implementation
- Schedule and/or description of how the proposed Action Activity can be completed by March 4, 2022
- Requested amount of CN funding
- Sources and Uses budget for the entire project including anticipated leverage from other sources

The *Action Activity Submission Form* in Attachment 2 may be used for the submission. However, the form is not required so long as the submission conforms to this format and includes all the information as outlined in the *Action Activity Submission Form*.

There is no page limit. Proposers are welcome to attach any relevant designs, maps, photos, testimonials, etc. to support their application.

Please note that if a proposal is selected for submission to HUD, additional information may be required to fully address HUD requirements. See Attachment 3: *Action Activities Requirements and Process: FY17 Planning and Action Grantees* for description of the HUD submission and review process.

V. Evaluation and Selection Process

HABC will use the following procedure to evaluate all the proposals received by the deadline and select finalists.

Phase 1- Threshold Review

HABC will first review all applications to be sure they meet the HUD requirements for funding. Proposed Action Activities **MUST** be:

- Physical in nature (can see and touch it)
- Able to be completed within one year
- Located in Poppleton/Hollins Market (see map in Section I of this RFP)
- Address at least one of the community's priorities (see Section IV of this RFP)

Proposed Action Activities may **NOT** be:

- A supportive service or program
- Temporary in nature
- A substitute for basic municipal services
- Housing development activities, including at the Poe Homes public housing site

Applications that do not meet these threshold requirements will be eliminated from further consideration.

Phase 2- Preliminary Community Review and Ranking

Applications that meet Threshold (See Phase 1 above) will be reviewed and ranked by representatives of the four neighborhood organizations (Poe Homes Tenant Council, Townes on the Terraces Tenant Council, Poppleton NOW and Hollins Roundhouse Neighborhood Association) based upon the Phase 2 evaluation criteria below. Each Neighborhood Association will individually rate and rank each proposal and submit these

rankings to HABC. HABC will combine the rankings from each association to create a single weighted ranking. Top scoring proposals from Phase 2 will be selected for further evaluation in Phase 3.

Phase 3- Technical Review

HABC, with assistance from EJP Consulting Group, will review the highest ranked proposals from Phase 2 to ensure they meet HUD eligibility criteria and complete a secondary ranking based upon the Phase 3 evaluation criteria. Top scoring proposals from Phase 3 (not to exceed \$1,235,000 in total funding) will be notified and further refined, as needed, for HUD review.

Phase 4 – Refinement and HUD Submission

HABC/EJP will work with the top-ranked proposers from Phase 3 to more fully develop each Action Activity for formal submittal to HUD no later than June 4, 2020³ (See Attachment 3: *Action Activities Requirements Process: FY17 Planning and Action* Grantees for more information about submittal requirements). The Steering Committee will review and approve the final project list to be included in the Action Activities proposal for HUD review.

Phase 5 - HUD Panel Review and Approval

A proposal is not considered final until official HUD approval. HABC/EJP will work with selected teams to address HUD questions or request for supplemental information. If any proposed Action Activity is rejected by HUD, HABC may elect to advance the next highest ranked project for HUD consideration or increase funding to a HUD-approved activity until all Action Activities funding has been utilized⁴.

Phase 6 – Implementation/Project Completion

Upon HUD's written approval of the activity, HABC will execute a grant agreement with the responsible entity. The project must be completed within the allotted time or HABC reserves the right to cancel that award. The project must also comply with HUD's environmental review requirements. A monthly progress report will be required for all HUD-approved action activities.

³ This is the latest date for submission to HUD.

⁴ All CN funds are subject to recapture by the US Treasury if not expended by the CN Grant Agreement deadline on March 4, 2022.

Estimated Timetable:

HABC issues Request for Proposals	November 26, 2019
Deadline to submit questions to HABC	December 31, 2019
HABC to post responses to questions received on the Transform Poe website at https://www.habc.org/habc-information/programs-departments/planning-development/transform-poe/	January 6, 2020
Deadline to submit proposals to HABC	January 15, 2020
Completion of Phase 1- Threshold Review	January 22, 2020
Completion of Phase 2- Preliminary Community Review and Ranking	February 28, 2020
Completion of Phase 3- Technical Review	March 20, 2020
Completion of Phase 4- Refinement and HUD Submission	June 4, 2020 ⁵
Completion of Phase 5- HUD Review and Approval	September 2020
Completion of Phase 6- Implementation/Project Complete	March 4, 2022

VI. Evaluation Criteria

Funding awards will ultimately be at the discretion of HUD. However, the following Evaluation Criteria will be used to rank proposals to determine which Action Activities will be included in the submission to HUD due by June 4, 2020.

Phase 2: Preliminary Community Review and Ranking (Neighborhood Associations)
to determine proposals for further evaluation in Phase 3

Rating Factors	Points
Addresses a community priority <i>More points for activities that address multiple priorities in the community</i>	30
Leverages other funding/activities/investments in the community <i>More points for activities that build on or support other planned or on-going investments or that have other funding and program support</i>	25
Located in strategic place <i>More points for activities that are located on a prominent corner, near Poe Homes, near other neighborhood improvements, etc.</i>	15
Seems feasible to implement in allotted timeframe <i>More points for activities that have more detail on how they will be implemented and capacity of identified implementation partners ; more points awarded for 'shovel ready' projects</i>	15
Builds Community <i>More points for activities that involve residents, build community capacity and/or increases social cohesion through the way in which they are designed, led and/or implemented</i>	15
Total Points	100

⁵ Mandatory HUD deadline.

Only top scoring ideas from Phase 2 will be selected for further evaluation and refinement in Phase 3.

Small/Micro Project Set Aside: At the request of the Steering Committee, HABC has set-aside up to \$100,000 of Action Activities funding for small and micro projects that do not request more than \$15,000 in Choice Neighborhoods funding. However, small projects are subject to the same evaluation criteria and must receive a score of at least 75 points in order to be eligible for this set-aside.

Phase 3: Technical Review (HABC)

to determine activities to be submitted to HUD for funding

Rating Factors	Points
Ability to meaningfully address a community priority <i>More points for activities that address multiple needs in the community</i>	30
Leverages other activities/investments in the community <i>More points for activities that build on or support other planned or on-going investments</i>	20
Sustainability/Maintenance <i>More points for activities that have a clear plan for on-going program support and/or maintenance. If not applicable, then full points will be awarded.</i>	20
Likelihood of Success <i>More points for activities that can be completed within the required HUD timeframe including approvals, receipt of additional funding (if needed) and construction completion</i>	15
Effective use of HUD funds <i>More points for activities that leverage other funds and maximize the impact of HUD dollars</i>	15
Total Points	100

Only top scoring projects from Phase 3 will be selected for submission to HUD. Note that selection through this process does not guarantee HUD approval and funding. Additional information will likely be required for the HUD submission. Proposers are expected to work with HABC to provide this additional information in a timely manner to ensure submittal by the June 4, 2020 deadline. Failure to do so will result in elimination from further consideration. Furthermore, HUD may require supplemental information and proposers will be required to provide such in a timely manner or be removed from further consideration.



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Attachment 1: Choice Neighborhoods Environmental FAQ



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Choice Neighborhoods Environmental Frequently Asked Questions

As required by the Choice Neighborhoods (CN) NOFA and Grant Agreement, all CN grantees must comply with the environmental requirements at either 24 CFR part 50 (Part 50) or 24 CFR part 58 (Part 58), depending upon the specifics of the grant and the proposed project activities. The following FAQs are provided to assist grantees in satisfying the environmental review requirements. Additional environmental review guidance specific to Public Housing Authorities (PHAs) can be found in [Notice PIH 2016-22](#).

1) What is an environmental review?

The National Environmental Policy Act (NEPA) and related laws and authorities require federal agencies to integrate environmental analysis into their decision-making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions. Part 50 provides regulations which must be followed by HUD to implement the policies of NEPA and other environmental requirements. Part 58 contains similar substantive environmental review requirements but for Responsible Entities (RE), including Tribal, City, State, or local governments, which assume HUD environmental responsibilities for a particular Choice Neighborhoods project or activity. HUD environmental reviews completed pursuant to both Part 50 and Part 58 should be completed online via the [HUD Environmental Review Online System \(HEROS\)](#).

2) Who should CN Grantees contact prior to commencing the environment review process?

Upon notification of grant award, grantees must contact their HUD Team Coordinator, who will provide the name of the HUD Environmental Officer at the appropriate HUD field office. The Environmental Officer, who is part of the HUD Office of Environment and Energy, will provide technical assistance to the grantee to help move through the environmental review process. The Environmental Officer may attend the initial CN site visit and participate in monthly calls, if available. Grantees may also contact their Environmental Officer for assistance with obtaining access to HEROS. Contact information for HUD environmental staff can be found [here](#).

3) May CN Funds be expended prior to completion of the environmental review?

Prior to completion of the environmental review process, neither the grantee nor any of its partners may commit or expend any HUD funds or non-HUD funds on any CN activity that would have an adverse environmental impact or limit the choice of reasonable alternatives, except for activities that are excluded from environmental review under Part 50 or Part 58 and not subject to related laws and authorities. These activities are listed at 24 CFR 50.19, 58.34, and 58.35(b).

4) Who prepares the environmental review for Choice Neighborhoods Projects?

For CN projects, either the environmental review is done directly by HUD program staff at the HUD field office (pursuant to Part 50) or HUD's environmental review authority is assumed by an RE which prepares the environmental review (pursuant to part 58). Whether the review is done under Part 50 or 58 depends upon the recipient of the CN assistance and any additional funding sources. The

following general guidance applies. However, Grantees should consult with their Environmental Officer prior to proceeding.

- A) PHA Public Housing Development: If a PHA is the grantee and is developing public housing, the grantee must follow Part 58, which provides that the environmental review will be conducted by an RE, which in most cases is the City. Only if the RE refuses to perform the environmental review would HUD conduct the environmental review itself, pursuant to Part 50. Under Part 50, HUD staff in the Office of Public and Indian Housing (PIH) at the applicable field office would perform the review.
- B) PHA development and Project Based Vouchers (PBVs): If a PHA is developing housing that includes CN funds and PBVs (a component of the Section 8 Voucher Program, overseen by the PIH Office), both funding sources should be covered by one Part 58 review prepared by the RE.
- C) PHA development and HUD Community Planning and Development (CPD) funding: If a PHA is developing housing that includes CN funds and CPD funds, such as CDBG and/or HOME funds, both funding sources should be covered by one Part 58 review prepared by the RE.

The RE may then complete one Notice of Intent to Request Release of Funds (NOI/RROF) or NOI/RROF/Finding of No Significant Impact (FONSI). However, there must be two separate RROF certifications completed in HEROS. One RROF and certification must cover all PIH funding sources and be signed and submitted to the RE by the PHA. The second RROF and certification should be submitted by the RE for all other funding sources that are subject to Part 58 and do not require the signature of the PHA. The RE should upload these certifications to the RROF screen in HEROS. Environmental reviews that require multiple RROF certifications require early communication and planning to ensure all certifications are obtained in a timely way.

- D) Development involving HUD Multifamily Housing Programs: If a CN project includes development under a HUD Multifamily Housing Program, such as Section 8 Project Based Rental Assistance (PBRA, also referred to as “Multifamily Section 8,” overseen by the Office of Housing) or FHA mortgage insurance that does not have Part 58 authority, Choice recommends that the environmental review for the full scope of the target housing project be prepared by HUD Multifamily staff pursuant to Part 50. This includes projects that include both Multifamily Housing and Public Housing on the target housing site only. The CN grantee should contact the HUD Multifamily office at the appropriate Field Office to coordinate the Part 50 review.

A Multifamily Part 50 environmental review that covers CN funds must be signed by the appropriate Approving Official for both the Multifamily and PIH programs. After the Multifamily Approving Official certifies the review in HEROS they must assign the environmental review to the appropriate Approving Official for PIH¹. The PIH Approving Official will then also certify the review in HEROS by uploading a completed “Environmental Review Signature Page” to HEROS. A copy of this signature page is included as Appendix A. If the PIH Approving Official is not willing to sign the Part 50 environmental review, a

¹ The Approving Official for PIH is generally the Public Housing Director in the applicable field office.

separate Part 58 review for the same project must be prepared by the RE. Environmental reviews that require multiple certifications require early communication and planning to ensure all certifications are obtained in a timely way.

- E) Rental Assistance Demonstration (RAD) Conversion: If a CN housing project is also converting under RAD, the environmental review procedures will depend on whether the project is converting to PBRA or PBVs, and whether the project involves an application for FHA insurance.
1. RAD Transactions converting to PBRA without FHA insurance will be reviewed under Part 50 by HUD Transaction Managers in the Office of Recapitalization.
 2. RAD Transactions converting to PBV without FHA insurance will be reviewed under Part 58 by the RE.
 3. RAD Transactions with FHA Insurance will generally be reviewed under Part 50² by HUD staff in the office of FHA Multifamily Production, whether converting to PBRA or PBV. If the transaction is converting to PBV, the review must be signed by the PIH Approving Official at the HUD local field office in addition to the FHA Approving Official.

In all cases, the grantee will provide HUD or the RE with information necessary to complete the environmental review. Environmental reviews for projects that include multiple forms of HUD assistance require early communication and planning to ensure the environmental review covers all appropriate activities and all signatures are obtained in a timely way. RAD environmental reviews completed under part 50 will cover the housing activities at the target housing site only, and off-site activities will require a separate environmental review (see question 5).

If a CN housing project includes an FHA-assisted or PBRA RAD conversion and other sources of HUD CPD funds such as CDBG or HOME, the environmental review can be completed by HUD staff in the Office of Recapitalization pursuant to Part 50.³ The environmental review will cover the full scope of the project within the target housing development only. A RAD Part 50 environmental review that covers CDBG and/or HOME funds must be signed by both the appropriate RAD Approving Official and the CPD Approving Official via a RAD signature in HEROS and an uploaded CPD “Environmental Review Signature Page” (located in Appendix A). If the CPD Approving Official is not willing to sign the Part 50 environmental review, a separate Part 58 review for the same project must be prepared by the RE. Environmental reviews that require multiple certifications require early communication and planning to ensure all certifications are obtained in a timely way.

The table below shows which review protocol a transaction will follow, along with who will conduct the review. The environmental review will cover the full scope of the project within the housing development.

² Most RAD transactions are reviewed under Part 50, however RAD transactions that are PBV Non-FHA or PBV FHA Risk-Share are completed by the RE under Part 58. See the chart in section E for more information.

³ Most RAD transactions are reviewed under Part 50, however RAD transactions that are PBV Non-FHA or PBV FHA Risk-Share are completed by the RE under Part 58. See the chart in section E for more information.

Description	Type of Environmental Review	Reviewer
PBRA Non-FHA	Part 50	RAD Transaction Manager
PBRA FHA Non-Risk Share ⁴	Part 50	FHA Production
PBRA FHA Risk-Share	Part 50	Transaction Manager
PBV FHA Non-Risk Share	Part 50	FHA Production
PBV Non-FHA	Part 58	Responsible Entity
PBV FHA Risk-Share	Part 58	State Housing Finance Agency or Responsible Entity, as applicable

5) What is the appropriate scope of work for a CN environmental review?

Generally, at the time a Federal grant is applied for, the entire project becomes “federalized” and no HUD or non-HUD funds may be committed or spent on any physical action included in the grant until the environmental review is complete. However, CN projects often have multiple activities which occur over the life of the grant, which may or may not be specifically identified when the grant is awarded. Therefore, it may not be possible to perform one environmental review that addresses all aspects of the CN project at the time of grant award. In the following cases, separate environmental reviews may be prepared.

- A) Housing Activities: When a CN project includes development of housing both on and off-site, all housing, particularly the off-site housing, may not be clearly identified at grant award. However, it is imperative that the on-site housing development begin right away due to CN and other financial requirements. Therefore, a separate environmental review for the on and off-site housing components may be done. Note that in this case, no CN funds may be committed or expended for the off-site housing until the off-site housing environmental review process is complete.

- B) Critical Community Improvements: Most CN projects include the expenditure of CN funds for “Critical Community Improvements” (CCI), which can include a wide variety of activities throughout the CN target neighborhood. While broadly addressed in the CN application, there is still a large degree of uncertainty about CCI activities at the time of grant award. These activities are usually not finalized until the grantee has prepared a CCI Plan, submitted it to HUD, and received approval of the Plan by the CCI Panel. In addition, HUD approval of individual activities identified in the CCI Plan may have contingencies which must be satisfied prior to release of CN funds for the specific activity. This process can take many months. For this reason, CCI activities are unique among HUD activities and may be addressed in separate environmental reviews which must be completed prior to HUD’s written approval of the CCI activity and HUD release of CN funds. Note that the grantee, and other project partners, are

⁴ Section 542(c) enables HUD and State and local housing finance agencies (HFAs) to provide new risk-sharing arrangements to help those agencies provide more insurance and credit for multifamily loans known as the FHA Risk Sharing Program.

prohibited from committing or expending HUD or non-HUD funds on any choice-limiting CCI activity (including acquisition, leasing, disposition, or any physical activity) until the environmental review is complete. The environmental review will be prepared by the RE pursuant to Part 58.

6) What is the appropriate scope of work for CCI projects that involve activities at multiple locations/addresses?

If a CCI activity involves identified activities at multiple *known* locations (e.g. storefront renovations at multiple identified addresses), the environmental review should capture the full scope of the project at all locations. Project activities should be aggregated in one environmental review according to regulations at 24 CFR 58.32, which say that an RE must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or both, or are logical parts of a composite of proposed actions. Grantees may contact their HUD Environmental Officer for technical assistance with project aggregation.

If a CCI activity involves activities at multiple locations that are not yet identified (e.g. a home repair program within a city or district), the environmental review should be completed as a tiered review. A tiered review consists of two stages: a broad-level review and subsequent site-specific reviews. The broad-level review should identify and evaluate the environmental issues that can be fully addressed and resolved, notwithstanding possible limited knowledge of the project. As individual sites are selected for review, the site-specific reviews evaluate the remaining issues based on the policies established in the broad-level review. Funds cannot be spent or committed on a specific site or activity until both the broad-level and site-specific reviews have been completed for the site. Additional guidance on tiered reviews can be found [here](#). Tiered reviews can be completed in HEROS using the Tiered Review Dashboard.

7) How do CN grantees determine the appropriate level of environmental review?

The RE determines the level of review required based on the specific project activities. Under Part 58 there are four levels of review: A) Exempt/Categorically Excluded from NEPA, Not Subject to the Related Laws and Authorities at 58.5 (CENST); B) Categorically Excluded from NEPA, Subject to the Related Laws and Authorities at 58.5 (CEST); C) Environmental Assessment (EA); and D) Environmental Impact Statement (EIS).

- A) Exempt/CENST: Exempt activities are listed at 24 CFR 58.34 and are largely actions that do not have a physical component, such as planning activities or services associated with the CN People Strategy. CENST activities are listed at 24 CFR 58.35(b) and are similar to exempt activities and will not have physical impacts on the environment (e.g. tenant-based rental assistance, operating costs, and maintenance⁵). HUD has made a programmatic determination under Part 50 that maintenance, administrative, and management activities for PIH projects listed in Notice PIH 2016-22 are not subject to further environmental review.

⁵ It is important to recognize the difference between maintenance activities and rehabilitation activities to determine the appropriate level of review. For guidance on categorizing an activity as maintenance, see [Notice CPD 16-02](#).

- B) CEST: CEST activities are listed at 24 CFR 58.35(a) and will usually have physical impacts. They include acquisition, leasing, or disposition of vacant land or existing buildings with no change in land use; rehabilitation, repair, and improvement of buildings as described in 58.35(a)(3)(i)-(iii); and individual actions on single family or scattered sites.
- C) EA: Per 24 CFR 58.36, an EA must be prepared if a project cannot be categorized as exempt or categorically excluded (e.g. demolition⁶ and new construction). In addition to the laws and authorities at 58.5 and 58.6, EAs must consider an array of additional potential impacts called EA factors.
- D) EIS: Per 24 CFR 58.37, an EIS is required when an EA concludes in a Finding of Significant Impact, the complexity of the project exceeds the scope of an EA, extraordinary circumstance elevate the level of review, or the project involves 2,500 or more housing units or beds.

8) Can Choice Neighborhoods funding be used for projects in a floodplain?

Executive Order 11988 – Floodplain Management requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development. HUD’s regulations in 24 CFR Part 55 outline HUD’s procedures for complying with EO 11988. The purpose of Part 55 is not in most cases to prohibit actions in a floodplain, but to provide the method for HUD projects to comply with EO 11988 and to avoid unnecessary impacts.

Additional resources for complying with 24 CFR Part 55 can be found [here](#). Grantees may also contact their Environmental Officer for technical assistance with floodplain management.

9) How can CN grantees identify if a property is historic? What are the requirements for preserving historic buildings?

A property is considered historic if it is listed on or is eligible for listing on the National Register of Historic Places. Over 20 public housing developments are listed on the National Register, and others are eligible because they meet the Register criteria. All federally-assisted actions are subject to historic preservation requirements, known as a Section 106 review. Under Part 50, only HUD may contact the State Historic Preservation Officer (SHPO) as part of the Section 106 review process, using documentation provided by the RE. Under Part 58, only the RE may contact the SHPO. See [the HUD Exchange](#) for additional guidance on Section 106 requirements.

10) Who signs the Request for Release of Funds and Certification (RROF/C) for Part 58 reviews? How long is the comment period for the notice?

For a CEST (that does not convert to exempt), EA, or EIS-level review, the RE preparer must complete a form 7015.15 RROF/C. This can be completed online in HEROS either by uploading a signed

⁶ Note: Under Part 58, demolition and/or disposition activities require an environmental review for the action and for any known future reuses of the project. Future reuse is not limited to future actions by the RE, but includes any future known reuse by the RE, PHA, or future property owners.

form 7015.15 or by completing the HEROS 7015.15 screen in the system. The 7015.15 must be certified by the chief elected official of the RE (e.g. the Mayor) or another Certifying Officer. A Certifying Officer other than the chief elected official must have been delegated the authority to certify that all environmental requirements have been completed and accept legal responsibility for compliance. Note: Certifying Officers are not required to obtain access to HEROS.

After obtaining the necessary signatures, the RE must publish or post a Notice of Intent to Request a Release of Funds (NOI-RROF) and a Notice of Finding of No Significant Impact, if necessary (EA only); this can be combined with the NOI-RROF. HEROS Environmental Review Records are posted [online](#) during the public comment period. The chart below lists the length of the comment period that must elapse before submitting the RROF to HUD. HUD will approve the release of funds by completing the Authority to Use Grant Funds (AUGF) Screen 7015.16 in HEROS after the HUD 15-day public comment period if no valid objections are received.

Type of Notice	Level of Review	Length of Comment Period
NOI-RROF	CEST, EA, and EIS	7 days when published Or 10 days when only mailing and posting
Notice of FONSI	EA only	15 days when published Or 18 days when only mailing and posting
Concurrent or combined notices	EA only	15 days when published Or 18 days when only mailing and posting



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TRANSFORM POE

Poe Homes | Poppleton | Hollins Market
Choice Neighborhoods Initiative

Attachment 2: Action Activity Submission Form



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Choice Neighborhoods Initiative

Action Activity Submission Form

Name: _____

Organization (if any): _____

Address (Street, City, Zip) _____

Contact Information (phone and/or e-mail) _____

Describe how your proposed Action Activity addresses at least one of the community's priorities (check all that apply):

- Improve safety and security
- Increase economic opportunity
- Provide new recreational facility or interactive open space
- Provide neighborhood conveniences and commercial amenities
- Reclaim vacant or blighted property
- Be a Fresh Food initiative

Describe your proposed Action Activity (must be physical neighborhood improvement; supportive services are not allowed):



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Describe the location of your Action Activity (must be in Poppleton-Hollins Market): _____

Describe how your proposed Action Activity leverages other activities/investments in the community:

Describe how your proposed Action Activity involves residents and/or builds community capacity:

Identify the lead implementation entity and list any other key partners who will assist with implementation: _____

Provide a schedule/describe how the Action Activity can be completed within one year: _____

Please attach any relevant designs, maps, or pages for additional narrative to respond to the above items as needed



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Attachment 3: Action Activities Requirements Process- FY 2017 Planning and Action Grantees



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Action Activities Requirements and Process: FY17 Planning and Action Grantees

Purpose of Action Activities

Neighborhood planning is an important first step in rebuilding community confidence and establishing a shared vision for the future. Over time, the planning process may start to lose momentum and the community, especially communities that have seen plans come and go in the past, may wonder when all this planning is going to turn into results. For this reason, physical improvements and investment actions, even modest ones, help communities build momentum for change and transition from planning to implementation of that plan. These actions improve neighborhood confidence, sustain the community's energy, attract further engagement, and help convince skeptical stakeholders that positive change is possible.

How Action Activities Funds Can Be Used

You must use Action Activities funds for **physical** neighborhood improvements, specifically community development or economic development projects that enhance and accelerate the transformation of the neighborhood. Action Activity funds are flexible funds that must be responsive to the neighborhoods' needs and build upon the Transformation Plan. These funds should be used for innovative solutions to neighborhood challenges and must be used for projects that can be completed within the grant term. Additionally, you are strongly encouraged to use Action Activities to build community capacity and social cohesion through the way in which the projects are designed, led, and implemented.

You **cannot** use Action Activities funds for:

- non-physical uses, such as supportive services, administrative costs (e.g., staffing, meeting space), and marketing;
- basic infrastructure or as a substitute for basic municipal services;
- housing development activities (including the public or HUD-assisted housing targeted in this application), such as acquisition, relocation, demolition and remediation, rehabilitation, or construction; or
- the planning and proposal process for Action Activities.

Types of Action Activities

You can only use Action Activities funds for the following activity types:

- Reclaiming and recycling vacant property* into community gardens, pocket parks, farmers markets, or land banking (with maintenance);
- Beautification, placemaking, and community arts projects, such as creative signage to enhance neighborhood branding, murals and sculptures, specialty streetscaping, or garden tool loan programs;
- Homeowner** and business façade improvement programs;
- Neighborhood broadband/Wi-Fi infrastructure and installation (internet service must be paid for by non-Choice Neighborhoods funds);
- Fresh food initiatives, such as farmers markets and mobile fresh food vendors; and
- Gap financing for economic development projects that are ready for implementation and have secured all the necessary financing except a modest "gap".

If your planning process identifies an innovative use not listed here, HUD has the discretion to consider whether that use is allowable.

*If vacant or other land is acquired with Action Activities funding and that land is eventually re-purposed for housing, the property must carry a 20-year affordability restriction of up to 120% of Area Median Income (AMI).

**Homeowner façade improvement programs may only address the exterior (or façade) of homes. Any interior improvements carry a 20-year affordability restriction of up to 120% of Area Median Income (AMI).

Required Elements of Action Activities Plan Proposal

In your proposal, you must respond to all of the elements listed below for each Action Activity. In your response to each element, you are encouraged to consider the questions listed on the *Action Activities Planning Tool*. More information may be required and you should work closely with your Team Coordinator to identify and provide additional documentation.

1) *Action Activity Description*: Provide a succinct narrative description of each Action Activity. Discuss how the activity supports the grantee's Transformation Plan and meets the Action Activities goals, such as enhancing and accelerating the transformation of the neighborhood and attracting neighborhood investment. Describe how this activity will build community capacity or social cohesion through the way in which it is designed, led, and/or implemented. Describe how the Action Activity is strategically located, aligns with other neighborhood improvements/assets, and/or aligns other Action Activities. Provide maps and, if applicable, photographs of the project and/or area to be impacted.

2) *Administration*: Discuss how the Action Activity will be administered. Identify all responsible parties and describe their roles. Include past experience implementing and/or managing similar projects. Provide an administrative budget for each activity and discuss how administrative costs will be funded. Administrative costs cannot be covered by Choice Neighborhoods Action Activity funds.

3) *Project Development Budget*: Provide a budget for each Action Activity showing all sources and uses of funds, including Choice Neighborhoods funds, leverage commitments listed in the application, and other sources that directly support proposed activities. Provide evidence of firm commitments for all leverage sources. A "firm commitment" means that the amount of the resource and its dedication to specific Choice Neighborhoods Action Activities is explicit. Endorsements or general letters of support from organizations or vendors alone are not sufficient. Commitment documents should be on official letterhead or other official documentation (e.g., city council resolution), signed by a person authorized to make the commitment, and dated. Funding commitments may be contingent upon approval and release of Choice Neighborhoods Action Activities funds for the specific Action Activity.

4) *Project Operational Budget*: If applicable, show that the operations of the project are sustainable by providing a preliminary 5 year operating budget for business related activities and describing the sources of funds for operations. Provide evidence of firm financial commitments for operations when possible.

5) *Project Schedule*: Provide a detailed schedule including all major milestones for developing and implementing each proposed Action Activity.

6) *Measurable Outcomes*: Identify the primary measurable outcome expected to result from the Action Activity, and the target goal for this metric. Possible outcomes include: increase in property value, increase in building permits, reduction in distressed properties, reduction in vacancies, increase in transit accessibility, increase in internet access, increase in permanent jobs or businesses (for economic development activities), etc. Please consult the neighborhood section of the Choice Neighborhoods Data Dictionary for potential metrics and definitions. As Action Activities are meant to spark additional projects and investment in the neighborhood, grantees will also be expected to track other (non-Action Activities) neighborhood investments. Additional investments can be tracked either through dollar amounts or narratives (e.g., 40 homes rehabilitated, a new police station constructed, etc.) in the quarterly report.

7) *Use of Program Income*: If income will be generated as a result of the Action Activity, indicate how the income will be reinvested and used for eligible activities within the development or target neighborhood. For example: if Choice Neighborhoods Action Activity funds are used to land bank lots and those lots are eventually sold to nonprofit builders, discuss how sale proceeds will be used.

8) *Program/Policy Guidelines*: If applicable, submit detailed Program and/or Policy Guidelines outlining your strategy with clear, step-by-step instructions targeting the implementation of your Action Activity.

Action Activities Proposal & Approval Process

Grantees have three and a half years from the grant award date to propose, secure approval, and complete their Action Activities. Grantees should work closely their Team Coordinator throughout their Action Activities process and development of their proposed Action Activities plan. Below is a summary of the key milestones associated with the proposal and approval process.

Month 21: Grantee Provides Draft Proposal

- Grantee provides HUD Team Coordinator with a draft proposal of Action Activities Plan, which includes preliminary descriptions of the activities to be proposed. Grantee may also, but are not required to, submit additional elements (as listed above). Grantee follows the *Action Activities Requirement and Process* guidance and uses the *Action Activities Planning Tool* to help shape their proposal.

Month 22: HUD Panel with Early Feedback

- Within a month of the submission, HUD Team Coordinator presents proposal to HUD Action Activities Panel, and provides early feedback to the grantee.

Month 24: Grantee Submits Final Proposal

- By month 24, grantee provides HUD Team Coordinator with final proposal for Action Activities Plan that includes all required elements of the Action Activities Plan Proposal (as listed above), as well as additional documentation as requested by the HUD Team Coordinator.

Review and Approval

- HUD Team Coordinator reviews submission with the HUD Team and requests clarification or documentation from the grantee, as needed.
- Grantee provides additional information as requested by the HUD Team Coordinator.

- Within 30 days of receipt of additional information, HUD Team Coordinator presents the proposal to the panel. The panel reviews the proposal and either approves, disapproves, or requests additional information.
- If the proposed Action Activities plan is not approved, the grantee must revise their proposal and resubmit within 2 weeks, unless another timeframe is established by the Action Activities panel.
- Upon completion of HUD's review and approval, HUD provides an approval letter for the overall Action Activities Plan and identifies requirements related to each specific activity before funds can be released.

Release of Funds

- Grantees should not begin implementing Action Activities that have been approved "in concept." HUD may approve Action Activities projects "in concept" and require additional information prior to HUD authorization of Choice Neighborhoods funds for expenditure. For example, a façade grant program may be approved in concept, but Choice funds may not be made available for expenditure until program guidelines have been submitted, revised, and approved. HUD reserves the right to withdraw approval "in concept" of a specific Action Activity if additional requirements are not met.
- The grantee must also complete the Environmental Review process for all Action Activities, pursuant to 24 CFR part 58. Release of funding will be contingent on Action Activities receiving Environmental Review approval. Please send evidence of approval to your Team Coordinator in the form of:
 - 1) The Request of Release of Funds Form (HUD-7015.15) signed by the responsible entity and the Authority to Use Grant Funds Form (HUD-7015.16) signed by HUD; OR
 - 2) Documentation that the activity is categorically excluded through: a) a letter by the Responsible Entity or the HUD Environmental Review Officer certifying that the Environmental Review has been completed pursuant to 24 CFR Part 58 and the activity has been determined to be categorically excluded; OR
 - 3) In the rare circumstance where the NOFA exception detailed under the "Environmental Requirements" section is met and the Environmental Review is being completed under 24 CFR Part 50 (HUD as the Responsible Entity), release of funding will be contingent on receipt of the completed HUD-4128 Environmental Assessment and Compliance Findings Form. The first page of the form must show either that the project is categorically excluded or that the project is recommended for approval.
- All Action Activities must be included in the Choice Neighborhoods Planning Grants Budget form (HUD-53236). For any changes to the Action Activities budget, a budget revision must be submitted to HUD for review and approval. Funds for specific Action Activities will be authorized for expenditure in LOCCS once all submissions have been made and approved by HUD.

Other Considerations

- Action Activities are not the same as Implementation Grant Critical Communities Improvements. Action Activities are limited to certain types of activities and are required to be completed within a much shorter time frame.
- HUD encourages the use of Action Activities funds for grants, instead of loans. However, if you are considering Action Activities that involve providing loans, please consult your HUD Team Coordinator as soon as possible to determine whether this can be accomplished within the required timeframe and what additional documentation and restrictions are required.

- Because Action Activities are meant to have a lasting impact, HUD typically does not approve Action Activities that use land on an interim basis, unless it is for the purposes of reclaiming and recycling vacant land.
- If there is a possibility that the project or site involves historic preservation, you should contact your State Historic Preservation Officer (SHPO) as early as possible.
- Environmental Reviews can take as many as 6 months or longer. HUD encourages you to work closely with your local Environmental Officer throughout the Action Activities process.