

**NDRC Long Term Commitment Factor  
Webinar Transcript  
Thursday, November 13, 2014  
3:00-4:30pm EDT**

Kathy: Good afternoon everybody, thank you for joining us today for the NDRC Long Term Commitment Factor Webinar with Q & A session. My name is Kathy Kaminski, I am with TDA, a HUD Technical Assistance Provider, and I will be the host today. Before we get started, and I turn it over to our presenters, I am just going to go through a few technical instructions. Please turn off your cell phones; and close e-mail and other programs on your computer and give your undivided attention to our presenters today. If you have any technical problems or you need assistance, please call George Martin at the number on the screen 410-547-1825. Alternatively, you can use the chat function to send a message to the host. That will come to me and I will be happy to help you out.

Everybody is going to be muted during the call, and you can ask questions in two ways. You can ask a written question, or verbal question, and I will go through instructions for both. For the written questions, you do not need to wait until we stop for Q and A to ask your question. You can ask those at any time. We will keep an eye on those and ask them when we stop for Q and A. you will see on the bottom right hand side of your screen a Q and A tool. Please use that to ask a written question. You can ask it to all panelists. Type in your text and click send.

To ask a verbal question, we are running this one a little bit differently than those of you who have participated in the last webinar. To ask a verbal question, you will need to make sure that your phone is connected to your online log in so that I can unmute you when you are ready to ask your question. So, take a look at the participant panel and look and see if there is a phone icon next to your name. If there is, you are all set and ready to go. If you do not see a phone icon next to your name, you can look in the event info tab, and locate your identity code. And that identity code will be pound and then a number and then a pound. You can also find that in the event information. If you look in the event menu at the top and click on information, a new window will pop up and you will see the identity code. You can type that in your key pad at any point during this presentation. It will not disconnect you or anything, but again, if you want to ask a verbal question, in order for me to unmute your phone, you are going to have to make sure that you enter that number into your telephone key pad.

When you do have a question, you can raise your hand using the hand icon that is in the participant panel, and I will unmute you when it is your turn in the queue. All questions are going to be answered verbally today, so let us know if you need a written response. We may not be able to get to all the questions, and we will try to answer the common questions first.

If you have additional unanswered questions, you can send them to the e-mail on the screen [resilientrecovery@hud.gov](mailto:resilientrecovery@hud.gov). And with that, I am going to hand it over to Jessie Handforth Kome.

Jessie: Meg and I are both here. I am Jessie Handforth Kome and this is Meg Barclay, and we are going to bring you the webinar on Long-Term Commitment, which has both Phase One and Phase Two of implications to the National Disaster Resiliency Competition. The agenda is very short on this one. We're really just covering very briefly the NDRC, National Disaster Resilience Competition background, and we're going to talk about Factor Five in Phase One and Phase Two long-term commitment, with an emphasis on Phase One, because that's what you guys are all working on.

Our purpose is to establish familiarity with the long-term commitment factor. It still factors in scoring consideration. I will give you links to the NDRC background and additional resources, and then respond to your questions both on this factor and on whatever else is bugging you about the NDRC, or questions that you may have. Note the NDRC NOFA, Notice of Funding Availability, published September 17, prevails if anything in this presentation conflicts, or appears to conflict with the NOFA, rely on the NOFA.

On background, the appropriation is nicknamed the Sandy Appropriation; it is Public Law 113-2. We have ultimately fifteen-point-two billion dollars, of which fourteen-point-two billion dollars has already been allocated. We published the CDBG NDR, or National Disaster Resilience Competition NOFA, for the remaining nine-hundred and ninety-nine million, one hundred and eight thousand dollars. If you are listening to this, presumably you are one of the entity sets considering competing for that. There are sixty-seven eligible applicants, and those are listed in the NOFA. Only one of those applicants may apply, and each of those applicants may bring only one application.

It is a two-phase competition, and in each phase, you have to get through certain thresholds. The toughest threshold, and the one that we're currently at as this is being recorded—we're doing the forty-five day courtesy review, optional, is the most impacted and distressed, and unmet recovery needs threshold. That is the one where we turn and look back at the disaster you had and see if you can get through the threshold; and tying back your proposal, your idea, to the disaster you had before you pivot and look forward for resiliency.

Let's jump out at that. We have a lot of webinars and other materials available on that, on the website, and that we'll give you. I remind you again of the goals. The factor we are going to talk about today particularly relates to institutionalizing the implementation of thoughtful, innovative, and resilient approaches to addressing future risks; to help you implement a recovery that makes you more resilient while improving quality of life; and making your communities more resilient to economic stresses and other shocks. This factor bounces back and forth off the leverage factor, so we'll discuss that a little bit in the scoring consideration.

Where you can get more information: you have seen this slide before. We have a website on the HUD Exchange, which is where we are with technical assistance resources. This links to all the information that you need for the NOFA. It links to HUD's page on resilience, which covers both all-different kinds of resilience, including economic resilience that our Office of Economic Resilience maintains. We have a link to the Rockefeller Foundation's resilience work, and if you have not heard by now, they are running a technical assistance effort in parallel with this competition effort, all through Phase One. And if you want to ask HUD a question about the NDRC, [resilientrecovery@hud.gov](mailto:resilientrecovery@hud.gov) and Meg and I are two of the three people who answer all those questions as fast as we can.

When I walked in for this webinar, at that time we had zero questions in the mailbox, so we caught up with the backlog again.

Factor Five: Long-Term Commitment. In Phase One you must describe any significant, or major steps you've already taken or are seriously considering, that commit you to increasing the resilience in your jurisdiction regardless of whether you receive a grant award after Phase Two. We want to see what your commitment is and so it is not just the points here that matter. There is not a lot of points on this factor in Phase One. But if you don't take a commitment, and we'll talk to you about what that means, if you don't make that commitment, you are not going to get invited to Phase Two. In Phase Two, if you do not take at least one commitment, you are not going to draw enough points that you may drop out of the fundable range. You have to take this really seriously, and we are going to be, as we are paid to be, very, very carefully reviewing whether you actually are committed to the steps that you tell us you are going to take.

This slide that we've showed you before on other webinars, talking about how geography affects allowable costs; we're statutorily limited to the CDBG NDR grants; the grant that you can get after the end of Phase Two. It may only be used for necessary expenses for the disaster recovery and economic revitalization and restoration and restructure, and there is a couple of other things—affordable housing—that are listed in the law, in the most impacted and distressed areas. So that is your geography that you're going to establish with your threshold. You have to use leverage to reach further, but one of the things that's going to happen, is that we're going to ask you repeatedly, and factor five is one of the places where we ask you, is to reach further. These are costs that you are going to have to bring leverage to bear, whether it's getting a lot of development paths, or doing plan alignments. Not all of those expenses are going to be explicitly related to your—if they're not explicitly related to your most impact and distressed unmet recovery needs target areas that are qualifying, you need to bring leverage. And that's considered supporting leverage for your overall proposal.

The commitment timeframe, when you take a commitment, we are going to only award points for Phase One, or invite you to Phase Two. If you have taken, after the date of the qualified disaster, or if you firmly commit to take within one year of the announcement of Phase Two results, which I think is going to be—what did we say, November or December 2015? So within one year from then, one or more actions improving permanent resilience in the geography, that includes at a minimum your most impacted and distressed targeted area.

Unpacking that, there is a commitment in there that you are going to make that effectively, because of Phase One applications are due in mid-March, and you will make a commitment then. You will have from March to December, and then one year, to get something done. So if you're committing to getting a piece of legislation passed, for example, or a financing mechanism put in place, HUD will come and check to see whether you've got that done at that point, if you were funded for Phase Two.

The commitment geography, again, we are going to give you points for reaching further to put this together with the earlier version of this that shows you what we can pay for. Again, you see that you are going to need some form of leverage if you want to reach further and try to reach for the points.

To get the points, you're going to also have provide a baseline and a goal outcome measure for at least one metric for putting in households, person's businesses, acres of land, structures for—tell us

how many years, expect it to be positively protected by each action or commitment, and you need to tell us what they're being protected from. That is going to be part of when you respond to the prompts. You have to also provide the actual or planned effective date of any change, and I have already talked about the dates, the time span that you have to do this. We are really serious about the metrics. Really, think about what you want to make better. What is your baseline, where are you starting from, and where you are going to be at the end?

In Phase One scoring considerations, we know that examples are provided in Phase Two factor five for the categories and examples of changes HUD will highly consider. You are going to be evaluated taking into account how big the geographic scale of the area is. We have certainly made that point and beaten it into the ground. And the degree to which the action as you describe it will clearly result in the significant improvement and resilience from the existing status or policy baseline. So it is really important to give us the existing status or policy baseline, and describe why you think this is a significant improvement, so that we can say, well that's clear, we've got that. And give us your data. Tell us this is all evidence-based practice. We want you to tell us: how do you know. What is your basis for thinking this improvement will happen?

HUD is also going to take into account the scoring if there are significant new actions that were taken after the date of NOFA publication, and not just the day after the date of the qualified disaster. That is a relatively minor point that we have in the NOFA as well for scoring considerations.

What are the commitment categories? The categories we want you to consider are lessons learned, which is our general category; legislative actions, raising standards, resilience related plan alignments and updates, and resilience related finance and credit and insurance. We have some examples of each one. I am going to walk you through exactly what it says in Phase Two, in case you haven't got that far yet. But this information is useful in considering which action to commit to, or it may reveal to you that you've already committed to one. I have had at least one eligible applicant say that.

In your lessons learned, this is your general category, so you are only going to use this if one of the other categories does not describe this for you. But we're basically asking how are the lessons learned in developing and implementing your NDRC proposal going to be embedded into your community and region's overall approach to resilience and recovery? Note here that you can focus on changes that you, or your partners, are committing to undertake, and that are most likely to measure and improve resilience at least during the projected useful life of your proposal for Phase Two, if not permanently. Now, when you are doing Phase One you will not know what your proposal for Phase Two is yet, most likely. Still, you are going to tell us the projected useful life of your change.

Legislative action; now obviously we know this takes time, and the legislative action category is one of the reasons we are allowing as much time as we are. If you, or any governmental partners, note here, we are only accepting from these governmental partners, obviously nobody else does legislative action, have taken, or will take legislative actions; the date of publication in the NOFA to enhance resilience of your communities, describe the specific actions. Examples of the actions include implementing significant updates to state and local building codes or zoning, to reduce and identify vulnerabilities, and other matters within the span of control of the applicant or public centric partners. We are aware, from the HUD point of view, of certain kinds of legislative actions

that are possible, or likely here, but it may be that somebody has thought of something new and innovative that we're not aware of. But think about legislative action that you can take.

On the raising standards category, HUD is encouraging you to consider raising your enforceable standards for construction and real property improvements, significantly above the minimum. And we'll provide points to communities who have already adopted above the established guidelines or minimum standards, that are measurable increasing resilience now, and will continue to do so into the foreseeable future. So if your community already has—I am going to just pick a random one—advisory base flood elevation plus three for rebuilds in a flood plain. I mean, nobody's there, but I mean if you have done that. You did that before your disaster, you were way ahead of your time, and it will increase resilience a measurable amount into the foreseeable future, you could propose that here. If you are already significantly above an existing standard, such as building for advisory base flood elevation plus one. Your response must identify your existing standards, and the change that you have already undertaken, or that you propose to take within the timeframe. There are prompts for this, and it is not just describe your action. We are also looking for—on rating standards, we give you some prompts. So, if your community is subject to flooding, we want to know, and we want you to respond whether you require standards above the minimum NFIP, National Flood Insurance Program, requirement. If you answer yes, this is a yes or no question, so you respond to all prompts in the NOFA, like obsessively. It is a yes or no question, give us a yes or no answer. Then, if you say yes, describe the requirement, and how is this going to be required or enforced in your state or region. Then there are some examples here. Then, have you, or will you, raise standards for permeable surfaces and include green roof requirements for new construction. Or substantial reconstruction in your flood plains. If you do not have any flood plains, just say that here and keep going.

Raising standards prompt: here are some more prompts for this, and they are also sort of ideas. These are, in a way, examples that you can think about. Have you implemented, or will you enhance state or local wetlands, preservation mechanisms or requirements, including compensatory mitigation plans, statute ordinances, do you have, or will you otherwise guarantee wetlands within the fifty and hundred year flood plains will be preserved; obviously, this is another place where the environmental review requirements are slugging in here. Because this is wetlands and something, you have to consider for environmental review if you have a flood plain. For non-flood hazards, which is everybody else, even though flooding is the dominant disaster type in the pool of the disasters that we had in the time period, but for non-flooding hazards, describe the actions you have, or will require, beyond an established minimum standard to improve resilience. If you had a high wind related disaster, have you updated your building codes some way? Within your response, specific to building codes, we want you to tell us the current version of your model building code that you adopted and enforced in the project area at a minimum. And provide a summary of, or links to, any relevant exceptions, because we know not everybody adopts all of the building codes, and any code supplements that you have adopted that are specific to your non-flood hazard reduction. This is also a relatively general category, and seismic would fall in here, wind, fire—these are non-flood hazards and we are looking for standards that you may have. Building codes are the most likely, but there are, quite possibly, other standards that you may have that affect the resilience of your community. One I can think of in some cases is evacuation routes and standards around that. But there may be others that you are aware of, like standards for how bridges are built.

Meg: This is just a really quick reminder. If you have questions that you'd like us to answer when we get to the question and answer period, please feel free to start entering those in the Q&A box at

the bottom right hand corner of the WebEx module here, so we can start collecting those and be ready to answer them. We will have other instructions for how to answer, or ask questions by voice, we will go through those, again at the end of the webinar, but you can please feel free to send questions in the Q and A box whenever you have them.

Jessie: Okay, plan alignments and updates, now this one is going to be challenging, not because you don't have plenty of plans that you can align, and we strongly recommend that you do, but because you're going to have to come up with a baseline and a metric that shows that resilience improved as a result of your plan alignment. So, you need to think about this pretty carefully. Communities have many tools that you can use to speed disaster recovery and improve resilience. That is a general statement that I think we would all agree with. We also have a lot of ways that we can slow it down, and we want to get rid of those. So, a lot of researchers and experienced funders have recommended that having plans aligned in advance of a disaster, is really, really helpful. For example, and this is a big example, according to the Georgetown Climate Center's April 2014 Summer Report, which we have linked on our resilience website, FEMA's required hazard mitigation plans often don't relate to local land use plans and regulation, which result in communities missing funding opportunities during post-disaster re-involvement. If you don't believe me, go look at that report, because there has been a lot of money left on the table, and it's really too bad. Because the faster you can get money to the recovery, the better and faster you recover. Good for all of us.

Other plans that may be considered for alignment include, for example, transportation plans, long-range transportation plans, the disaster recovery and hazard mitigation plans that we mentioned, prior CDGB-DR action plans, a variety of different kinds of housing plans, including HUD's Con Plan—Meg is cheering now, Meg is the con plan guru here—Continuum of Care commitments, Analysis and Impediments to Fair Housing Choice, Regional Fair Housing and Equity Assessments, economic development plans, there's a few listed here, all different kinds of environmental plans, coastal zone management plans, and climate action plans that some of you may have at the county or state level. These are all plans that could be aligned, and if you think about it, getting them aligned before a disaster, getting them aligned in ways that say if a disaster occurs, or if we go for an additional investment, these are the considerations that have to be in there, including resilience considerations. Those are the threats and hazards you identify, and that is what we are looking for. As we have said over and over, the big money is not our money. We have a billion dollars we can split up around the country. It is going to build some model projects, but we cannot take care of all the resilience around the country for this money. But all of the investments that state and local governments are doing every day, all the time, on infrastructure and housing, and the entire built environment—drainage, all of those things—if you're considering how to make yourself more resilient on a lot of levels going forward, and if all the plans align and consider those ideas in an aligned way, then your next disaster in ten or fifteen years maybe you just don't need much help and you just walk through it, and nobody dies. That is really a good thing; we really want to get your plans aligned as much as possible. But finding the metrics is going to be challenging.

Under plan alignments and updates, we also have prompts. Again, if it is a yes or no question, answer the yes or no question and then if you say yes, give us a full answer. Have you updated your land use plans since the date of your qualified disaster to reflect your best evidence based risk information? Have you provided for swift or automatic updates to land use plans post disaster? And automatic is underlined here. Again, I refer you back to that Georgetown study; you may want to take care of this one. And how have you explicitly linked your hazard mitigation plan and land use requirements to recognize post-disaster issues that may constrain your community's access to

FEMA funding in the event of a disaster? Describe the linkages between your hazard mitigation plan and local land use requirements. And how the linkages will make your community resilient. If there are no linkages, you are going to have to tell us that. Identify separately the changes that affect the most impacted and distressed target areas, and those that affect the larger region or state. We are going to tell you this consistently, that we want you to clearly tell us about the most impacted and distressed area, and then go bigger. We want to make sure you get through that minimum threshold.

Under plan alignments and updates, the second prompt is: we are looking to see if you have an enhanced multi-hazard mitigation plan. We know that there are some places around the country, and some of the sixty-seven that do, or have it underway; or if you are a local government, your state may have this. This already incorporated consideration of the long-term threats imposed by climate change. If you have it describe it, and how it is going to be implemented in your most impacted and distressed target areas in your region or state.

The third and fourth prompts are here. We want to know if you are participating in the Federal Highway Administration's Climate Change Vulnerability Assessment Program. And are you identifying critical vulnerabilities to your transportation system. If yes, tell us about your participation. If you have aligned plans and processes other than those in one and two above since the date of the qualified disaster, identify the affected plans, and this is the generic category here on plan alignment, describe the changes and other expected resilience impacts in your most impacted and distressed area or region or state. Remember, we are asking you for baselines, and expected outcome measures generically across this entire thing. So, as you answer that, if you go in this generic category and go through some of the other plans, make sure you're specific about the changes and your measures, and what data did you use to determine what the projected measure should be.

The fun one is financing, credit and insurance. When we talked about long-term commitments originally and some of us added in this financing mechanism and long-term commitments, we got told a lot in the discussions that we had across other federal agencies, that they couldn't understand what kind of long-term financing commitment we could be talking about we can use through annual budgets. We were like, oh man, there are a ton of different ways that we're aware of that people have already figured out. How to work on these financing sources that are available for disaster recovery and resilience, so in a leverage factor, we are giving you points for the amount of funding you bring to leverage, and supporting your proposal. But in this sub factor, we're looking at the duration and dedication of funding for improving resilience. We want to see how long it will be there, not just cash on the barrel as a leverage for getting the project done. We want to see a long-term commitment in your most impacted and distressed target area, and in your region or state. Every time the NOFA says that, remember to break out your most impacted and distressed target area, and then tell us about the greater region or state. Do not blur those lines; be real clear about the difference in the two areas.

There are some prompts in this section. Do you, or will you, have a financing source or mechanism dedicated to addressing and identifying risk or vulnerability? If yes, we want to get the details from you. And we want you to give the funding on an annual basis expected after the date of the NOFA, which is September 17, 2014. And the financing's primary, and any co-benefits in your most impacted and distressed area, and in your region or state. The example we borrowed was from a county that was not declared, and still not on the list of qualified communities in Appendix B. So Charlotte and Mecklenburg County in North Carolina used storm water fees to run a flood plain

buyout program that purchases properties that reduce future flood damage risks to the properties that they do not buy. They buy properties in the flood plain, take them down, which improves the function of the flood plain, and it increases the property values of the surrounding property because there is now someplace for the water to go that's not in those surrounding properties. And it helps with their impermeable surface problem. It is not a huge program, but over time, it has been pretty effective for those flood plains. The reason HUD noticed it is because there are some public housing units in the flood plains there, that have flooded.

Another is landlords that own and rent relatively small numbers of housing units to low income renters. Usually have terrible problems getting credit for repairs after major disasters, which leaves, or exacerbates, shortages in affordable rental housing units after a disaster. It is a little known, little recognized and understood piece of information that about half of the rental housing in the United States is small landlords, not big developments. So these are small businessmen and business women in your community that have a very hard time accessing help and that are providing critical housing.

Do you have a financing source or mechanism that can improve the resilience of your stock of at risk rental units, before, during or after an extreme event? So this is looking for whether you have some way to make sure that they get prepared before a disaster, that they know what to do to protect their property during a disaster, and that maybe they can get access to affordable resources to recover after an extreme event. If you have a mechanism like that, or you want to set one up, describe it, include the start and end dates if any, for end dates, we definitely want the start date; and annual funding expected after the date of the NOFA; the financing's primary benefit, which would be to help prepare the housing. The co-benefit might be to a neighborhood around it in your most impacted and distressed area in your region or state.

We keep going with these prompts because we know that a lot of communities are thinking about these, but have not actually implemented one, and we want to try to share the ideas that we've heard and that we found in the research. Low and moderate income persons are very vulnerable to income disruptions following a disaster because so many businesses go under. Employers of low and moderate income persons, such as Section Three employers, for those of you who are familiar with CDBG and Section Three, which is a local hiring requirement. They may have difficulty securing credit following a disaster, they may not qualify for SBA assistance, and they may be less likely to return to business at all. So, we're again looking for a financing source and descriptions of the financing source that will help improve the resilience of these employers of your low and moderate income persons.

We are also looking under these prompts for any actions that you've taken to increase the percentage of appropriately, and fully insured, private and public buildings, homes and businesses, in your most impacted and distressed area, region, or state. It has not escaped the notice of the federal government, and more particularly the CDBG-DR crew here at HUD, that a lot of places don't have fully insured private and public buildings. And they're not insured for the disasters that they have, even when the insurance is available. And they're making some trade off decisions that are very expensive for the public sector, for taxpayers to handle. The fastest and most effective recovery, and the people that are most likely to recover, are the people that were insured. Our Gulf Coast study, which is linked off of HUD's web page, where we evaluated some of the Katrina recovery, housing programs. One of the findings of the study was that the people that were insured, when we did windshield surveys, they were more likely to be rebuilt by thirty percentage points, or



forty percentage points, over people who did not have insurance. So, insurance is incredibly important in your recovery and in your resilience. So, describe any actions that you are taking, and at the outcomes and benefits, trying to increase the percentage of insurance in your community, how much you would like to increase the percentage, how vulnerable populations, and businesses serving them, could be included in this, or will be included. And we want to know, and this is the tricky part, how your efforts to improve insurance coverage will necessarily continue over extended durations. We do not want a one-shot deal. We are looking for long-term commitment.

Looking ahead to Phase Two, HUD is going to evaluate your response to factor five by assigning points for local, regional and state commitment that can be reasonably expected. You have to make the case to increase resilience. There is up to ten points available, which could be make or break in the competition. If such change is not already implemented before your submission for Phase Two, but is planned for completion, or implementation, within one year of the Phase Two grant award announcement, you can include the change in this factor. But you're going to have to submit a signed letter with a firm commitment on the part of the entity, the eligible applicant, or the partner, responsible for taking and committing the act, implementing the action to complete the changes by a date certain, subject to loss of some, or all, of the awarded funds if the entity fails to complete the changes. So, if you have not already done it, you need to be very, very serious about—this is not something to be lightly entered into. Being able to get it done in the timeframes allotted. And you're going to have to make the commitment and sign it.

Also in Phase Two, if you're going to propose a covered project, which is one of the very large projects, we're only going to give points for the sub-factor if you also incorporate considerations of the effects of the changes into your benefit-cost analysis by quantifying, or attempting to quantify the value of each of the changes. But you're going to have to do baseline and outcome measures, so you're already attempting to do some form of quantifying.

Questions. If I have not completely put you to sleep, there are forty some odd of you out there, and I am open to taking questions now. You can ask them on the firm commitments, or if you have questions about other aspects of the competition, we will try to field your questions now.

Meg: We do not have any questions in the box yet. I do not know, Kathy, if anyone has raised their hand on the vocal, or on the verbal question cube, but actually I wanted to ask if you could clarify. Going back, it was back on slide eight I think, talking about long-term commitment as it relates to Phase One and Phase Two, that is not very many points towards this factor in Phase One, but it is a requirement of Phase Two? So without a long-term commitment you're saying that those Phase Two responses would be considered non-responsive.

Jessie: Well you cannot get to Phase Two at all. You cannot get an invitation to Phase Two. The NOFA says HUD will not invite you to Phase Two unless you have demonstrated the firm commitment in accordance with the NOFA. The detailed instructions are in Phase Two, I just wanted to refer you to Phase Two for the whole—we just did not want to repeat the whole thing twice.

Speaker: Thank you for clarifying.

Jessie: But in Phase Two, we really score it.

Meg: That's something that applicants would really need to start working on early, because this is then a small thing to have to put in place if you're talking about some kind of change to codes, or those are all very difficult things to do at the local level, so that was just very striking to me. It seems like the kind of thing that everyone would have to be pretty far down the road on, by the time the Phase One application is submitted, to know whether that's even going to be feasible for Phase Two.

Jessie: That is correct, and we are aware that some communities have let us know that they've raised their standards, for example, on code regularly, and that they did a big increase after the qualified disaster. And if that qualifies them, then that's the sort of thing we're thing we're talking about on the raising standards. But the legislative ones we know are going to be difficult to get done in the time allotted, and the plan ones we know you're going to have to work hard to figure out how to quantify your baseline and outcome changes on resilience. There is information out there, and research and I have seen some things like on the American Planning Association's website, that would definitely help with figuring that kind of stuff out.

Meg: And this is not necessarily even have to be a funding commitment. This is changes to rules, changes to policies, changes to building codes, things like that.

Jessie: Right, because not everybody has additional money to throw at this. We're already used for this but there are actions, again that governments take every day that could change your resilience.

Meg: Well, it does not look like we have any hands raised yet for verbal questions. Does anybody have a question in the Q&A box? Anything about the firm commitment, or other NOFA questions?

Jessie: Is it all perfectly obvious?

Meg: The State of Florida says thank you.

Jessie: I have never had such a fun webinar where I get thanked before I get asked questions.

Meg: Is there a way to utilize programmatic agreements for environmental review that have been signed by other federal agencies, such as FEMA?

Jessie: If they are for the exact same project, there is a way with FEMA, but I am not an environmental review specialist. But if you look on the HUD Exchange, the parent page, the resilient recovery page branches off of, go to the CDBG-DR page, and they have a link to the Sandy notices. Public Law 113-2, for the very, very first time after a lot of begging, Congress did give us the ability to streamline the environmental review when there's other federal funding involved, and the federal agency has done review. I am not a specialist on that, but we can lay that out. We were planning on laying that out a little later, like along in January or so, but we can get a guidance piece off an FAQ pointing to the right thing. That is a very good question, because programmatic agreements can take a long time. But the answer is, there should be. There is for other federal programs.

Meg: Any other questions? If you ask a question now, you are in the front of the line. Here we go. When an application is being developed, is there an expectation that eligible activities are

interrelated? Can they be developed separately, but submitted under the same application? And will HUD award parts of an application, or will it be all or nothing?

Jessie: Great question. We do not have expectations either way. It could be independent activities addressing different risks or vulnerabilities. We certainly have some states who are eligible applicants who have a county on the northeast corner, and a county in the southwest corner, and so we said you could have multiple projects inside an application. They might take different paths through every factor, or they might do the same thing for your long-term commitment, but different things for some of the other factors. They can be developed separately and submitted under the same application. HUD did reserve the right to—we tell you in the NOFA directions that you have to identify all scaling and scoping places where we could break your application in parts and fund some or all of it. We did retain the ability to fund parts of an application. I do strongly caution you that this NOFA is looking for a unified, coherent application. And not just an assemblage of projects. If you submit projects to it in Phase One, you are not going to be answering the prompt, and you will be non-responsive anyway. So, we're really looking for the eligible applicants have a single, coherent, guiding management capacity. But yeah, you can have multiple, disparate projects addressing your risk and vulnerabilities. If you only have gaps in certain areas, or if you are dealing with different geographies that qualify as most impact and distressed and have unmet recovery needs.

Meg: Here is another one. For projects that could be enhanced, but are already underway, can the project proceed without halting work to comply with additional requirements that deal with them moving forward?

Jessie: That is tricky. We are not giving any reimbursement other than for certain general administration and planning costs should you get a Phase Two award. It is really, really tricky to deal with a project that's already underway, and get through the environmental review hoop. It is just really, really hard, particularly because that earlier question about can you use one environmental review for another, you probably didn't do the environmental review and defined the project with the enhancements. And, the caveat on being able to ride on another federal agency's review is that the project has to be defined the same exactly, or you'd have to go back through the environmental review. This would be very difficult. If it's an add on phase, or you were going to fund a drainage system, but you can't fund the last mile, then an add on phase is separate, you wouldn't have to stop building the drainage system if you needed to do the last mile in your most impacted and distressed area... or something like that. That is possible. If you are talking about a major resiliency add on to protect your recovery, and you built a recovery project, but what you need is to build something that is separate enough, that is really a separate project to protect your recovery, that is definitely possible. That is the approach you should take. That's almost the only way to do a pure resilience project is to get tie back to your recovery, is that you recovered, but the recovery needs this additional element to be protected and complete. But those are still a little tricky. You have to really think about describing them. But the prompts are designed to help you walk through that logic if you look at the prompts carefully, and you have that kind of a project in mind.

Meg: Another question? Going once, going twice; I think that we are done then.

Jessie: And we say thank you very much for participating in our webinar today, and we will continue with these series of webinars, and will continue walking all the way along with you right up to the deadline on March 16.

Questioner: Hello? I have a question. I work for the City of New York, where New York is an eligible applicant; however, I work for the water supply of the city, which is upstate in New York. And we have an ongoing flood hazard mitigation program with upstate communities where we fund plans and projects within those communities to make them more resilient. Can the City of New York be considered a qualified applicant on behalf of those communities? Or do those communities need to go back through the State of New York?

Jessie: I have to think about this, but I am pretty sure you'd have to go through the state. The reason is a jurisdictional one.

Questioner: Correct, that is what I am thinking too.

Jessie: We would look to the state; it would be very hard for the city to enforce some of the things you have to do for environmental review.

Questioner: We have environmental regulations here, we have regulational jurisdiction over some of the communities in terms of some things, but not in terms of...

Jessie: Right, but HUD has all the additional environmental, but that's where I think it is a jurisdictional problem. So I would say very likely the state.

Questioner: Okay, is there somebody I can direct this question to in an e-mail to find out who at the state I need to contact? Do I need to go through the New York State Department?

Jessie: I don't have a specific contact for the competition in New York State, but the CDBG-DR grantee, I believe the CEO is Jamie Rueben, and all the CDBG-DR grantees are on that web page that's one up from the resilient recovery page: the HUD exchange CDBG-DR. And maybe they're on this webinar, I don't know. They would be able to tell you, I'm sure somebody in that unit. And you can always go ask the New York HUD Field Office, who you can also look up online at [hud.gov](http://hud.gov), but call the Community Planning and Development office there. Vincent Hom is the Community Planning and Development Director, and he'll know a lot of contacts at the state, and they'll be able to help you find. But we don't know. We do not know really the who for anybody yet.

Questioner: Okay, very good. Thank you.

Jessie: Have a good day.

Meg: Okay, one more chance, anybody have questions? All right Kathy, take us home.

Kathy: All right, thank you all for participating today. We will be posting the materials online over the next few days, and the transcripts probably in about a week. Just remember to check back for the instructions for joining the future webinars. Thanks so much for joining today. Thanks Meg and thanks Jessie.

Jessie: Thanks everyone.