

NDRC NOFA Q&A Session: Most Impacted and Distressed Threshold Response Webinar Transcript Tuesday, December 9, 2014 3:00-4:30pm EDT

George: Good afternoon everyone. Thank you for joining us for this afternoon's NDRC NOFA Q&A session about the Most Impacted and Distressed Threshold Response. My name is George Martin; I work for TDA. We are HUD technical assistance provider. I'll be providing technical support for today's Q&A session. In just a moment, I'm going to turn over the reins to our great HUD presenters we have today, but before I do that, I'm going to go through some technical instructions for today's webinar.

First I want to remind everyone to please silence the phone that you're not using to access this teleconference and close your email and other programs on your computer and to give our presenters your undivided attention. If you have technical issues with either the phone or the webinar, and you want to talk with someone, you can give my colleague Vicky Grimm a call on the number that appears on the screen right now: (410) 547-1825. Or if you're able to access the chat function on the right-hand side of the webinar screen, you can send a chat to the host, that's me, and I'll do my best to resolve your issue. So everyone who has called into the teleconference and webinar has been muted. We've done that, so that you can give the presenters your undivided attention and that there won't be any distraction from people's dogs barking in the background or something like that. You can ask questions when we get to the Q&A portion of today's session in two ways. You can send in written questions using the Q&A tool in WebEx, or you can ask questions verbally via the conference call. I'm going to go through instructions on both of those ways to ask questions.

To ask a written question, you'll use the Q&A tool on the right-hand side of your screen. You'll see a number of boxes on the right-hand panel. One of them should say Q&A. If it only says Q&A, and you don't see anything else, there's probably a little triangle to the left of the Q&A that you can click, and it'll open up that box on your screen. To ask a question using the Q&A tool, please, enter your question into the field, and then please, select the option to send the question to all panelists. And then you simply have to click send.

Asking verbal questions is a little bit more complex. If you look at the participant panel on the right-hand side of your screen, you should see your name under the word "attendees." Is there a phone icon next to your name? If yes, then you'll be ready when their time comes to ask verbal questions. If you do not see the phone icon, and you think you'll want to ask a verbal question, you'll want to click on the tab called "event-info" at the top of your screen and locate something called "the identity code." You want to enter this identity code including the # symbols into your telephone keypad. If you have trouble looking on the event-info tab, you can also go to the event menu at the very top of the webinar. When you click on event, then

click on the word "information," another set of information will come up that includes the identity code. Again, please enter the identity code including the # symbols, into your phone if you would like to ask a verbal question. Then when we get the Q&A portion of today's session, in order to ask a verbal question, please select the small hand icon at the bottom of the participant panel. This will inform us that you have a question that you'd like to say over the phone, and we will unmute your line.

Some notes on questions today. We generally answer all questions verbally. So please let us know if you would like some sort of written response, and we will try to get that to you as soon as possible. Depending on how many questions we have today, we might not be able to answer all questions. We'll try to answer common questions first. The other thing is that we usually answer questions that come in written on the Q&A function before we answer questions verbally.

If you have a question that you don't want to ask on the webinar, or you think of something later, or you want to ask a private question, please feel free to email those questions to ResilientRecovery@HUD.gov.

On that note, I am going to hand it over to Jessie Handforth Kome, who is the presenter today.

Jessie: Hi there, this is Jessie Handforth Kome. I'm in the room with Meg Barclay, Duncan Yetman, and Lynsey Johnson who are all people who helped us out with the 45-day threshold review. We got quite a few submissions. Unfortunately I'm not allowed to say exactly how many. On reviewing them, we realized that we needed to do some more technical assistance and that we needed to make ourselves available to grantee applicants, so that you could ask your questions. So we scheduled this webinar today on the Most Impacted and Distressed Thresholds. They are actually individual thresholds. On Thursday at 3:00 p.m. we're going to be doing a discussion of the unmet recovery need, not urgent recovery need, Unmet Recovery Need--I see it's wrong on the web--Threshold and walk and walk through that if you want to also participate in that one on Thursday, we'll be here again.

Todd Richardson isn't here yet. We're hoping he comes. So if there are data questions, we'll hold them, and deal with them with him whatever we can't handle. We all learned a lot about data during this though. So a brief review, the most-impacted and most-distressed, threshold criteria. There's already a webinar that walks through these. That's the link. They're covered in Appendix G to the NOFA itself. We're going to walk through a brief review because we want to spend a lot of time on Q&A today of the most impacted and distressed threshold. I have in my hand right now a copy of the technical amendment that we're about to do. I have verbal approvals on it, and we will launch it. There will be a technical amendment to Appendix G. Both the reviewers and several alert applicants pointed out some issues with the appendix that are technical and that we need to fix ranging from a missing word to some bad formatting that was confusing and things like that. We're going to be moving that really soon.

Today, because we don't have it issued, I am going to be answering questions as much as possible. Todd is coming in, and he has really, really bad Christmas sweater on. Answer questions as much as possible based on the new version where I can, where I have to, I'll

signal to you that I'm going to answer you based on Appendix G as it stands because that's the way the rules are, but that we are reconsidering means that it's going to be affected by the technical amendment. We're going to try to get it out in time to be up by the time we do the Q&A on Thursday. Stay tuned.

Okay. Let's jump forward and just take a look at the slides. If you want to ask questions at any point in the chat box, feel free to start putting them in. Meg will be sorting the Q&A box. Meg will be sorting as we go forward, so that we can get started on the questions if you think of them while we're presenting. So we have three thresholds the most impact, distressed and unmet recovery need. If you want to think about most impacted, it's really looking at where did the disaster do damage, and how much damage was done. The distressed what are the characteristics of the most impacted area that exacerbate the effects of the impact of the disaster and make it more difficult for that area to recover? Unmet-recovery need is what need resulted from the disaster remains now in the most impacted areas; that you cannot meet with available resources. In meeting these thresholds, you have to essentially answer these questions. That's what the instructions in Appendix G walk you through. You have to support your answers with information or data exactly as it is requested in the Appendix.

The next one, so the most impacted and distressed thresholds, which we call MID, come directly from the appropriation, which provides that that the recovery assistance has to be for recovery in the most impacted and distressed areas. Of course, we said now that you have to address recovery needs, not completely meet them, and that we are fine with resilience to address or protect recovery needs above and beyond addressing needs is eligible for this funding. But there still has to be that tieback to the most impacted and distressed area and demonstrating the most impacted and distressed area. Thursday we'll be talking about unmet recovery needs. We're decoupling them right now, but you have to meet all three thresholds with each area in which you're going to want to spend money. We're going to start calling that area the MID-URN, most impacted and distressed-unmet recovery need, you MID-URN, target area. Your greater target area-- Let's jump forward to another slide.

Your greater target area--and we're going to talk about this a little bit more--for your NDRC proposal as a whole we do want to be larger. So our allocations have to be based on the best available data, and that's why we're so insistent on the data and not just assertion. We don't have data on which we want to rely, on which we think is quality for us to rely to make allocations. We are asking that the applicant data, the supporting data is going to meet, not necessarily the same standards that HUD uses, but good relatively reasonably rigorous standards for qualifying as best available data. We've outlined the threshold criteria in Appendix G as we've said. If you fail, and some people have asked us, if your submission does not demonstrate unmet recovery need in a most impacted and distressed area, at least one, you're phase-one application is going to be deemed unresponsive, and we won't score it. If you get at least one through, even if you don't get all of the ones through that you proposed in phase one, we'll still score your application.

This was one of the big questions, and one of the areas that we are going to address. In Appendix G, it moves. At some points it says in sub-county area, at some points it says for counties HUD is already determined, it says county, and in other places it says target area. So

we're working on, what is a target area? For your MID-URN, your most impacted and distressed, unmet recovery need threshold, which is your Appendix G threshold and your factor-response minimum for phase one. A target area is equal to the area you demonstrate meets the MID-URN thresholds. It's at a county level when HUD designated them and nationally most impacted county. It's that list in Appendix G that's called the MIC tab, the most impacted county tab, or it must be at the sub-county level for all other declared counties, and that's a declared county by disaster tab in also Appendix B.

We're not going to be considering for the MID-URN threshold for where you can spend the grant money, non-declared county, but your proposal overall can have a proposal target area larger than that if you're spending other money there. But for right now, we're talking about your most impacted and distressed areas unmet recovery needs target area. Each area must meet at least one of the most impacted, one distressed and one unmet recovery need criterion described in Appendix G. Obviously we were putting these together way too fast, and the CDBG-NDR grant funds can only be used to assess these qualified areas. And then we talk for your NDRC overall proposal, which is beyond the factor minimum and beyond the Appendix G threshold. Your target area is the overall area you proposed for resilience. Another way to think of it is your MID-URN areas, plus areas you add because of supporting leverage, because of long-term commitments that you're making. These are your greater resilience areas, but they're not about disaster recovery, so we can't fund them.

We don't answer why often enough in my opinion. So why is the MID-URN, target area definition important beyond what we said about the law? So the law says most impacted and we need applicants, not HUD. We're given you the chance to make the choices and to demonstrate what is most impacted in your jurisdictions. HUD makes the decision most of the time. When we do a formula allocation we tell you what was the most impacted. In this case we're asking you. Because of that, you can't propose every single county that was declared. You need to tell us some way, some reasonable showing of what's most. We follow the Appendix G directions to demonstrate most impacted. Because the amount of housing and business impact that we put in for the threshold in Appendix G are really calibrated to be more appropriate at the census-tract level, not at a full-county level or at the multiple-county level. Twenty severely damaged houses scattered across a state that has all of its counties declared is not going to be a most-impacted area, so it's a calibration issue. As a policy writer, we're looking for a fundable scale for projects that we can reasonably fund and get compelling projects in your eligible geography with; I hate to say it this way, just a billion dollars spread around the whole country. These are sort of some why reasons if you're wondering why we're doing this. We're trying to meet the law and also meet some policy objectives.

There are a lot of issues we saw around: what is the sub-county level? I'm going to signal to you right here that this is also a place for the technical amendment, which I have in my hand, is going to play through. A county is a county or county equivalent that receives the major-disaster declaration from FEMA. Most of you don't know what I'm talking about because you have counties, but we also have these other parishes, boroughs, independent cities, District of Columbia, educational attendance areas. There may be something else in Alaska. I don't know. But it's at what got the declaration from FEMA with the exception of-- We consider tribal areas a sub-county level for reasons of our own, not because we think tribes are actually sub-

county hierarchically, but because it simplifies and deals with some other issues we have related to tribal areas. Tribal areas are sub-county level for purposes of qualification for most impacted and distressed, but at a sub-county level we would also consider census tract.

Todd: Or multiple census tracts.

Jessie: Right, and we're allowing a group of aggregated contiguous census tracts that together are still sub-county, a smaller geographic area with a county. What I'm going to tell you here is the list of things from tribal areas on down. The way that notice is currently written, there are only two choices: census designated place and census tract. We are going to put as such as in front of that probably or something along those lines because that was meant to be-- We were looking for a sub-county area. We're not necessarily trying to drive you to a particular kind because it doesn't work for all four kinds of things, housing, economic, environmental. So that is a technical change. This slide gives you an idea of where we're going, and that the county equivalence—like, the independent cities that have their own declarations like the District of Columbia are not sub-county areas. They are because they are eligible applicants in their own right, so we're looking for them to give us at the level of census tracts or a group of contiguous census tracts. It has to be something that we can get the data at that level that is not all jumbled up, that is easily available, and we can get it and agree it's data.

So can a county be a sub-county was an of an odd question with which we kind of dealt in this because there was an applicant who figured out how to make a most impacted and distressed showing for every single, sub-county area, every tract with the county, but they did each one separately. They did each one separately for most impacted and distressed correctly. So there is somebody out there who pulled this off, and we got this answer. We said, you can't aggregate most impacted and distressed data for a whole bunch of different groups of sub-county areas across your state, but you can make a demonstration for each census tract, or each group of census tract that make up a place and basically use up all of the census tracts in the county if each of the sub-county areas meet the most impacted and distressed logically and reasonable. For the case that I am mentioning actually, each one did have enough damage in a couple of categories, and each one of the tracts had a brownfield and a documented brownfield, and so they got through on distressed. But it was an interesting case. So it is possible to get whole county through, but you're going to document it at the sub-county level that it was really a county-wide, impact event. Again this is a scale problem with the way we set the thresholds for data. If you can get it for one, you can get it for all in the sub-county. This is not hard data to get.

On most impacted and distressed responses, you're narrative response-- This is just driving home again that we're looking for place name and/or census-tract codes. We're saying such as if you were going on the environmental, and we know that sometimes you're going to be naming features for us, we signaled in those responses. We hadn't thought of that, but it of course makes perfect sense to us now. And so take a look when we reissue the guidance later this week, and I think that'll help the environmental factor, but for housing there's no reason you wouldn't just go have place names or census-tract codes. We'll talk more about unmet recovery need. Again this is an and, and, and. An area has to be most impacted and distressed and have an unmet recovery need to qualify for funding from the grant, and we have to have

the data either through a link or by just submitting it supporting the framing of unmet recovery needs as described in the NOFA.

I'm going to tell you right now, a few of you gave us passwords to data and the passwords expired after like 10 days. They expired before we could complete your review. Please don't do that again just as a technical note. If we say we're going to take a period of time, please don't have the password expire until like 15 or 20 days after that because we're doing quality assurance-quality control, and we don't necessarily download all of the data until we're all the way through the quality assurance piece. So if that's a problem for anybody send me a note at ResilientRecovery@HUD.gov, but be careful about those expiring passwords on data. And we do guard privacy. We're very careful about it, so we're not sharing it. It's not available to other people. We've got it in a locked share point where we do download it if we have to.

The acceptable data sources are defined in Appendix G. You must use those data sources. If we're more general, then you give us what you think is the best one. If we're specific, we mean that data source. In phase two, you will get to update phase-one, MID-URN responses as necessary, and we're just going to tell you that we're looking for-- We'll give more points, so this is about threshold and about points. We're going to give more points to more accurate, detailed, and robust responses as we progress through this. Okay, Lynsey. We had something else right, a request from Rockefeller Foundation?

Lynsey: Yes. So this is Lynsey for OER, and Rockefeller has asked-- They are looking for applicants to send the submission that you actually send to HUD as well as HUD's response to that submission. Please send that to Resilience.Academy@RockFound.org. They're going to use your submission as well as the HUD response to the submission to help tailor technical assistance moving forward.

Jessie: Because of the Reform Act, HUD is not allowed to give these to Rockefeller. Only you can. As Lynsey just told me, you're the holder of the privilege of whom you give them and not us, so until after the competition is completely over, there's an embargo on us releasing it, but if you give it to them it will really help them to tailor the technical assistance for the ask. I also want to let you know that FAQ 35 is out of date, not because it's wrong. It's just incomplete now that we've done the reviews. We're going to be updating FAQ 35, which is specifically on, I believe, sub-county areas. If you submitted and you got a note about deficiencies, you're most emphatically not alone. We graded really hard on purpose because there is going to be a big team of people in doing these reviews in phase one. They're going to be working directly off of checklists. We wanted to make sure that if you were interested enough to submit, you'd make it through. Please don't give up. We saw a lot of really, really cool ideas that still had some deficiencies on the data front, or didn't completely respond, and we're pretty excited about what we saw. Meg, do we have any question in the queue.

Meg: Yes. Somebody had asked for a clarification about what has to be done in order for a proposal to be scored in phase one as far as, I think, just restating how you meet the threshold requirement as it relates to at least most impacted and distressed recovery needs.

Jessie: Okay. If I understand the question, what you have to do to get scored in phase one is

get past the threshold. You need to get one area past the threshold. That's not guaranteeing you're going to pick up a lot of points or anything, but it means that HUD will score your application if you demonstrate that one area is most impacted and distressed and has unmet recovery need. By demonstrating that means you also have to give us the data or backup information, supporting information, for which we ask. To be honest a lot of people, I think, made the case where if somebody was just standing and telling you, we were willing to believe it, but the data wasn't there to back it up, and we cannot accept assertion. We are not allowed to allocate funds because it says we have to allocate based on best-available data. So tell us this was the best data we have available. Here's the data. If we say engineering report, we'll take any report where it says an engineer prepared it and it covers what we'd expect in an engineering report. If it's a project worksheet, and it says an engineer prepared it, and it has all of the information for which we asked, then that's an engineering report. If you give us that and don't say that an engineer prepared it, we're stuck. It's an engineering report when it's prepared by an engineer and it tells you what the repair needs are. We hated to be that picky. There was actually one for which that was a problem. I saw an earlier question too about the block-group, census-tract thing.

Meg: The question is, is there any calibration issue regarding data at the census-block-group area; for example, HUD LMI percent is at the block-group level and not the tract.

Jessie: Yes. Percentages, I will let Todd speak to. Most of the time if you submitted a block group to demonstrate a tract; if it was just raw numbers; like, you're telling us there were 20 severely damaged homes in block group, we're okay with the tract being demonstrated, but if you're doing percentages, those of you who have ever tried to game the low and moderate income area benefit, know that it's not just calibration. It's not answering the question. So we had a few where block groups were submitted for the LMI one. I believe we didn't accept it because it wasn't the entire target area. People told us that the target area was a county or a sub-county area, but they only gave us one or two block groups inside of that instead of the whole thing.

Todd: Right, this is Todd Richardson. There are two ways to look at this. One is if you're identifying an area that's multiple-block groups, then you need to sum those block groups together to determine the low-moderate benefit, the percentage. But if you're saying, our target area is the single block group within this tract; that is okay. We'll accept that as a sub-county area, and if that's sub-block group, and that's the only part of that census tract in that block group that's low-moderate, that's fine. That counts as distressed. Not sure if that's the question, but you need to give us the total areas for your target area.

Jessie: For the target area. So if you're telling us that it's multiple-contiguous tracts, then that's what you've got to us about for the LMI area, but it still has to be a sub-county area. Slide up. What else.

Meg: There's a question about most impacted. For that category for infrastructure it says that there needs to be \$2-million in damage. Does there need to be \$2-million left in unrepaired damage or just total damage in that area.

Jessie: For the most impacted and distressed, which is where we are today, this is about total damage, not what's left over to be repaired. It's about how hard were you hit in that sub-county area, or if you were in a most-impacted county in the county area. The other interesting thing that a lot of people missed was in the environmental one. For most impacted the question was: What was the impact to the environment? I mean. A lot of people gave us a project there and said, there was an impact to a project, not necessarily talking about the impact to the environment. The environmental degradation one in most impacted is about what was the damage to the environment. I know that can be tough to estimate, but several places pulled it off. Sometimes it could be that there was damage to a water and sewer facility that then overflowed in estimating the damage to the water facility sewer facility tells you both the infrastructure one and the environmental one, but we are looking for total damage in that one area. We're not allowing aggregation across sub-county areas. For each sub-county area you're trying to qualify, if you're trying to qualify multiple ones, each one has to have that \$2-million for most impacted. It's important that that damage is the result of a disaster.

Todd: Well, for most impacted the threshold is \$2-million. The unmet-repair need is \$400,000.

Jessie: Zoned across all of the possible target areas that you've gotten through. So we allow aggregation on unmet recovery need, which we'll be talking about Thursday, but you may not aggregate for most impacted. We're looking for straight-up, boom, impact for most impacted.

Meg: The next question: Did the fact that my jurisdiction did not submit a letter by November 3rd, and I think that's for the 45-day response, count against us for the phase one application?

Jessie: No, not at all. These are actually set aside, gone as if they did not exist. Accept now you've got them and you have some additional instructions if you did submit. I would say if you didn't submit, you may want to cozy up to some people who got some letters and take a look at them and see how we reacted. We'll be putting as much out as we can in FAQs to the extent that we can view multiple failures or multiple deficiencies on a particular point to be essentially a question to us that we need to answer. We're going to do this technical amendment, and everybody should keep their eyes out for this. It'll post on Grants.gov.

Meg: There's a question about the MID-URN target area, whether that target area can be contiguous, census tract across two declared counties.

Jessie: No. You have to be a sub-county area within one county even if they touch across the boundary. You'd qualify them each separately. It's a calibration thing. Todd's sitting here nodding, no. He's our data guy.

Meg: Another geographical question. Would geography definitions in the Bureau of Labor and Statistics local-area unemployment statistics count for sub-county even if there's not a direct overlay to tract or block group.

Jessie: Yes. That was easy. Todd says yes. I think we'll pick that one up for FAQs because I actually have seen that one before. Meg's working on getting us the next question. If you have a question, type it in. We'll go to the phones at some point, but right now we're still getting questions. So what's the next one?

Meg: The next one is, if you have project that needs MID-URN, I understand that can be funded. But is the resiliency you would add, that is, strengthening the power grid funded?

Jessie: There are two ways to do this. We're not at phase two yet. In phase one, you're just giving us an idea or concept. We're not a project yet, so this is really a phase-two question, but I'm going to tackle it. If you have a project in a MID-URN area because the project doesn't meet MID-URN, the area meets-earn. We can fund something to assist that area. If your project is strengthening your power grid, and your power grid was not at all affected by the disaster, or you didn't lose power, you cannot make tieback; you're in trouble. We are not a pure resilience or mitigation program. We are a recovery program. If you had power failures, and you got the power back on, but you see the weakness in your power grid as causing issues with your economic revitalization following your recovery, and you can make that case, then you may be able to strengthen your power grid.

There are ways through this to projects that protect your recovery, promote economic revitalization, which is one of the purposes of the law. Making tieback for that kind of a project, just a straight energy-grid project, it's one of the trickier problems to make tieback for a project. This isn't about meeting most impacted and distressed though, so we're probably confusing some people who are listening to this. The answer is that it's theoretically possible, although, it's one of the more complex cases that you'll have to make. You'll need to look at that definition of tieback and really think about it, but first you have to establish most impacted and distressed. You have to establish unmet recovery needs and then you're going to have to establish somehow that that dealing with your power grid, protecting it, or creating-- What do they call the power islands where you can take yourself off of the grid and turn yourself on uninterruptively something like that is a tieback to disaster or to protecting your recovery and your revitalization. It's a long logical chain.

Meg: Another most-impacted question. It relates back to the environmental degradation discussion before. In New Mexico a burn scar resulting from a forest fire resulted in a flood from a sever storm and a PDD?

Todd: Presidential declared declaration.

Meg: Presidential declared declaration. Can the burn scar be part of the environmental degradation since it isn't specifically part of the presidentially declared disaster?

Jessie: I love that New Mexico one, by the way! I was one of the ones who got to read that, and I've been going around talking about hydrophobic-burn scars ever since I read that. That was new for me. So you had a forest fire that had environmental degradation. I don't remember whether the fire had a presidential declaration or not, but the flood did. Walking across the environmental aspects that are in most impacted, distressed, and unmet recovery needs, if the

fire did not have a major declaration because I can't remember if it did or not. If it didn't then that preexisting, burn scar is clearly part of distressed because it made the flood worse. Now you didn't show me data that proved it, but it did make the flood worse. You're going to have to basically prove it. So it's got distressed. If the fire was part of a declaration, a major declaration, not just a fire declaration, then you can possibly get it in under the most impacted as well by showing the damage to the environment; that the cost of the damage to the environment exceeded the \$2-million threshold under most impacted. Is that the right way to go Todd?

Todd: That's right, but I think that the main point here for most impacted, assuming that the fire was not presidentially declared; the flooding you need to show the most impacted from the flooding. If that's the question. You actually have to tie it to the presidentially declared declaration. That's statutory.

Jessie: But if the way the to deal with flooding and to protect the community and to protect the recovery is to move over and deal with the burn scar, then that is a chain of logic that you could build to get there to clear-protecting-the-recovery kind of argument. Burn scars take a long time to heal. I don't remember what New Mexico told us, but I know it's a long time when they're created.

Meg: But for the purpose of the most impacted and distressed, you're saying it's the flood that has to have caused the damage for making the case.

Jessie: Right, if the fire wasn't a major. Again, if the fire was a major, you have a slightly different. So it would be an interesting case too because if the fire is in a different county we can actually-- To assist your most impacted and distressed for the flood, if it means doing work a county over or in another location, we actually need to-- We're still trying to deal with that question to figure it out, but we're pretty sure that that's possible. But we would have to look at the full range of effects, and you might want to have some leverage in that kind of a deal, once we get to phase two, if it gets that far.

Meg: Okay. This sounds like possibly the distressed. Can separations from the quarterly workforce indicators count as people losing jobs. Is that for most impacted for economic?

Jessie: That's definitely a Todd question.

Todd: So I'm going to have to look at those data, and see what level of geography those are providing still. I don't know the answer to this question. We can put that in an FAQ.

Jessie: FAQ, we'll get that one out. So we need to get that question noted. You have that question noted somebody who's taking notes for me.

Meg: The next one is in the response from HUD, HUD had indicated the guidance would be forthcoming regarding documenting prior environmental distress for the purpose of the stress threshold. Will this be included in this week's guidance?

Jessie: Yes. What happened in Appendix G is that, right now the way that it's written, it's ambiguous about whether brownfields are the only way through it. We are fixing that paragraph to be clearer. We gave that saying keep watch. It's definitely going to be part of the technical amendment.

Meg: The next question: Can you clarify on the distressed environmental, degradation threshold for what constitutes prior to the disaster environmental distress?

Jessie: Well right now, what the Appendix G talks about is brownfield. The other things that we have now seen are prior and ongoing land subsidence and prior and ongoing erosion, movement of rivers through contaminated areas, and sometime just major movements of rivers into previously developed, or away from previously developed areas. Either one can be a problem. I'm trying to remember what else we saw in prior environmental distress, but it's not something that was caused by the disaster. It was something that was there when the disaster hit. The reason we put that in is because the research literature shows us that for certain kinds of environmental distress, severe environmental distress, preexisting a disaster when a major disaster hits, those communities have a much harder time recovering and the amount of funds that are generally provided by insurance and that the population has and that the federal government supplies just aren't enough to drive recovery in those areas. So we're looking for something pretty severe that's retarding your recovery.

Meg: The next question is, if a data source was expected, say the threshold letter--and I'm assuming that that means this 45-day-review response--is there a possibility that a different reviewer will not accept that data source?

Jessie: We're going to run all of the data sources through the same reviewers in this case. Todd and his able people were looking at them pretty seriously. So if we accepted it before a data source, we're probably going to accept it again. That one is going to be pretty stable. It's rigorous enough or it isn't.

Meg: Just to clarify, a sub-county area can be a census tract? Each census tract would need to meet MID-URN correct?

Todd: Well to be clear, you can actually provide an aggregation of census tracts.

Jessie: As long as it's sub-county.

Todd: As long as it's sub-county. If you've got an aggregation census tract, you don't have to qualify them individually, you could qualify two or three or four census tracts together that are sub-county.

Jessie: The other qualifier in that is we actually have a couple of counties that have multiple declarations. Don't group them if they were affected by different disasters. We have a couple of counties that were affected on one side by a flood and on another side by a major fire. Don't group the fire and flood ones together because you're not going to be able to push them through most impacted and distressed really in a logical way. You make two grouping in your

county and get two sub-county areas or something like that. That's pretty exceptional. I actually spotted a couple of those moving through. I think Roundup, Montana may be one of those. What else do we have Meg?

Meg: In choosing our phase-one direction, they need some clarity around meeting a national objective. The question is, Does the national objective need to apply to just the MID-URN target area for the beneficiaries of the recovery-resilience work in phase two?

Jessie: That's a good question. First of all I'd like to make it really clear that all three national objective are on the table. It's not just low low-mod. We also have slum-blight and urgent need. You need to read Appendix A when you do get down to your project work and look at Appendix E for possibilities for waiver requests in standards. That said, the national objective is going to need to met for the activities that are funded with CDGB-NDR, so that is the MID-URN or part of the MID-URN area that is actually benefitting from the CDGB-NDR assistance. If you go to a bigger area, and fund it with something else, that's not our problem. We're not going to force the entire area covered by your long-term commitment, for example, to meet a national objective--just the part we fund, just like regular CDGB. We're looking at the benefit driven by what we fund. I hope that answers the question.

Meg: This is another, I think, where we need to clarify again the project versus target area conflation problem. The question is are the most impacted and distressed threshold requirements specific to a project. In other words do we need to meet the most impacted-distressed threshold for each project proposed?

Jessie: We are not talking about project in this phase at all As a matter of fact, we're going to eject that word, I think, mostly from Appendix G.

Meg: I don't think you got anywhere in the slides we showed did project show up.

Jessie: We are talking about most impacted and distressed areas that have unmet recovery needs. A project that you propose to be funded with the CDGB-NDR grant funds has to serve, assist, help with economic revitalization, restoration of infrastructure, disaster recovery and resiliency. The part we are funding is going to have to primarily assist that most impacted and distressed area with unmet recovery needs. The project is not most impacted and distressed. The project serves the most impacted and distressed unmet recovery need area. Here's the ambiguity right. So you have a project that serves that area, but your overall proposal in phase one or phase two and your overall idea can be from a much larger area, but we are asking you to then think of our money as seed money, and you're going to be driving towards some other financing or actions that you're going to take that will drive resilience in a larger area. So our funded projects will assist the most impacted and distressed, unmet recovery needs areas. Your overall proposal is going to at minimum serve that area, but it might be bigger. If you want to get all of the points for leverage and long-term commitment, it's going to be bigger.

Meg: It's just that CDGB awarded funds can only be spent in the target areas for which you qualify as most impacted and distressed with unmet recovery.

Jessie: For the benefit of, not necessarily in.

Meg: Oh, for the benefit of. Right. Exactly! For the benefit of project areas qualified under most impacted or distressed with unmet recovery needs. The burn-scar people are still confused. "The only thing Appendix G accounts for is environmental distress and brownfield."

Jessie: I know that. It's supposed to-- Alright. I'm going to talk a little out of school. It's supposed to say, for example, brownfield. It's a technical amendment. Keep watch. We know that. We are very frustrated because we actually have a draft that says for example that didn't make it out of the building and was meant to, so let me see the whole burn scar question again, can you scroll down? I lost track of it.

Meg: It says that it seems to include burn scars or in their case coastal land loss. Will brownfields be the only way to document environmental distress?

Jessie: They are not going to be the only way to document environmental distress, and we're really talking about severe environmental distress here. We've had discussion. The burn scars by the way, at least the ones that we saw in our submission were not actually designated brownfields yet. They weren't on any lists. We did go hunting, or in any case closed to land loss. Oh, that brings me to a point about data. Please help the reviewers. If you submit to us a link for an entire dataset without honing in on and telling us exactly what to look at, you can bet that we're going to miss your point. We need you when you send us a link to data, to send us a link to the data that tells your story. If we ask you for the low-mod summary data, the lower-moderate-income-summary data, at least tell us the exact census tract to look up, or when we click a link on your data, have us looking directly at the exact data that we need. Don't make us look at the whole dataset that HUD puts out there for the whole country to try to figure out at which tracts you're looking because your application needs to sell your most impacted and distressed area and convince us clearly and thoroughly. All of us hit submissions that just gave us these huge data dumps. We couldn't figure out which piece we were supposed to be using. Help us get your point. Communication is part of the jobs you guys have to do.

Meg: We shouldn't have to make your case for you.

Jessie: We do really want to, but we may miss it.

Meg: We won't be able to show that we treated all applications fairly if we have to make your argument for you. That's a problem for us. So there's a question about whether a statewide or state-agency project can be funded with the grant. They're assuming that eligible counties or sub-counties would have a direct benefit.

Jessie: There are very, very few eligible applicants in the pool who could possibly do a statewide plan, but here's the rub, and why the answer is actually no. The law says "most" impacted and distressed areas. You have to choose and tell us what the most impacted and distressed area, or if you're an eligible applicant that's a city or county inside of your jurisdictions are. You have to choose and tell us which ones are most impacted. If you're doing a plan to determine which is most impacted, and how to deal with that, and you want to do

statewide too, you have to put supporting leverage in the game to pay for the non-most-impacted areas. "Most" is in the law, and we have read the law, so that "most" means something, so it can't mean the whole state. It must mean a "most" impacted, "most" distressed area.

Meg: Okay, so the next question was, whether we were saying all impact has to be demonstrated by an engineering report?

Jessie: No. We linked to the engineering report specifically for...

Meg: Infrastructure.

Jessie: For infrastructure, I believe.

Meg: And I think for some degradation.

Jessie: And some degradation, but not all, so you need to look where we say it specifically. That's what we're specifically looking for.

Meg: On page 6 of Appendix G, this is an example. Under Housing B1, if you aren't running a CDBG-DR or other recovery housing program currently, briefly explain why prior allocation-- Oh, this isn't right. I'm looking at the...

Jessie: No, you're looking at the wrong one. It's not housing. It's an infrastructure-- But it's in B.

Meg: Infrastructure states that you need to demonstrate a sub-county area estimated at \$2-million or greater, and you have to provide an engineering report. Housing though requires a concentration of housing damage in a sub-county area due to the eligible disaster, It says that applicants may also submit local data provided that the data show concentrated data meeting the standards and that HUD agrees with the validity of the data if you decide not to use the data source that's provided relative to housing. That's not an engineering report. That's other data that you can provide to us that demonstrates either causing damage to a minimum of a 100 homes or serious damage to a minimum of 20 homes. So that's the threshold for demonstrating most impacted housing. HUD Has provided a list of census tracts that meet that threshold. So you may also use your own data, which is not necessarily an engineering report, to meet this particular criterion.

Jessie: Right, so that's what I said about taking a look at Appendix G, a careful look, for what data we're specifically asking because we looked for that. For example, one of the key ones is a fair number of applicants gave us engineering reports, and that did great, but they skip the giving us sources and uses, so we couldn't tell if it was unfunded when we got to unmet recovery need. We don't have that problem on the most impacted side, and so they got most impacted, but they didn't get the last bit, which was the unmet recovery need. It's like you have to have all of the pieces, all of the dots, all of the sentences in a row. I think you skipped one

that I was kind of interested in, Meg. Up above that. The lack of vegetative growth since a fire disaster. Oh, that's an unmet need. Right. She's keeping me disciplined and focused on MID.

Meg: I just want to like stay on mid. So we had a question about compiling all of the damages and data for each county or sub-county across all eligible disaster declarations. That's their plan. How is it possible to break out threshold data for individual disaster if a county's damages are cumulative over seven years?

Jessie: Seven disasters!

Meg: Seven disasters, excuse me, yes.

Jessie: Yeah, It better not be seven years.

Meg: Seven disasters.

Jessie: This is interesting because if you have seven disasters that occurred one on top of each other in pretty much the same year, yeah. You're going to not be able to tease it apart. But we have situations where something happened in 2011, a totally different thing happened in 2012, and a totally different thing happened again in 2013. For this particular one I know that they also got hit again in 2014, but we only care about 2011, 2012, and 2013 for the purposes of the competition. If you cannot tease apart for individual eligible disasters for that timeframe, and that truly is your best available data, make your case. If you really had every same sub-county hit by all seven disasters, you have some sub-counties that are hit by all seven, and you can't get the damage data apart, make your case that you can't, but this is a long time. It's a three-year period. So I would look really hard at it. We're looking for most impacted by the disasters in that time period. Theoretically we could throw together 2011, 2012, 2013 for a place that was hit by all of them. That's possible. I didn't see that in any of the submissions. So you're going to have to talk to us. You certainly cannot-- And this is directed directly at our Gulf Coast recovery grantees. Please don't reference Katrina because that's not in the time period. You can make a case on Katrina in the environmental degradation, the distress factor if you need to, but it isn't going to work for most impacted, and it's not going to work for unmet recovery need.

Meg: Okay, so this is the clarification. They're asking if costs associated with improving the resiliency of the community can or cannot be included in the unmet-need estimate to satisfy the phase-one threshold unless you can show that improvement is necessitated by the damage from the disaster.

Jessie: Somebody here really wanted to get us to Thursday faster. This is about most impacted and distressed, but what the NOFA says is that we're doing resiliency recovery projects. You have to have a project that ties back to an unmet recovery need before you can do resilience if you lost a whole lot of housing for example and you decide to do an economic-revitalization project, you're going to have to tie it back to the damage you had. Sometimes that is a perfectly logical response to try to drive your area to greater economic revitalization and assume the market will take care of the housing that might be an appropriate response, but you're going to

have to make the case that that will make you more resilient because of that. So the resilience, yes, does have to tie back to your MID-URN, your most impacted and distressed, unmet recovery need area has got to somehow and address unmet recovery need what you're proposing. A recovery need can include economic revitalization and it can include resilience, but that's a phase-two problem.

Meg: So now you can answer your, does a lack of vegetation growth since a fire disaster count as an unmet need if you want, or we can wait until Thursday.

Jessie: No, no. I mean. This is an interesting one. I've seen a lot of fires over time including ones that were bad enough to be major disasters. So if you have a fire major disaster, and it's wiped out all of your vegetation, and that is somehow causing you a recovery problem or a revitalization problem, or you can't do resilient recovery without the vegetation, then that should be a quantifiable damage, degradation from the disaster that you can get into most impacted, and then talk about your unmet recovery need from there. But if it wasn't a major disaster, then it's not on the table for the most impacted and distressed.

Meg: So we had a question before about whether a FEMA project worksheet would meet the requirements for an engineering report with estimated repair amount. I believe the question was answered sort of piggybacking on another question [with] the answering being, yes. It would count if you say in the project worksheet. The project worksheet says that the repair and the worksheet itself were prepared by an engineer.

Jessie: Or the cover letter. We actually got a couple that it looks like it might have been prepared by an engineer, but we literally read them line-by-line and could not tell. They didn't actually-- We're from Missouri. You've got to show us. It didn't say, this was prepared by an engineer. It said, the engineer is a contact. We're like help us out here, but we also had several that said they were prepared by engineers, and we accepted them.

Meg: So were there any other written questions? The other written questions were questions relative to Rockefeller assistance, which we will cover before the end of the session when we talk about resources that are available to applicants. We're there any other questions in the Q&A, or actually George, are there any folks with their hands raised in the verbal queue?

George: Hi, Meg. It doesn't look like anybody has indicated that they would like to ask a question over the phone. Just a reminder folks, if you do want to do that, at the bottom of the participant panel on the right-hand side, there's a little hand button you can press, and we'll unmute you or have you unmute yourself.

Meg: So then, I think that gets us to the questions about the Rockefeller assistance. We have some folks asking if we could restate what we should send to them.

Jessie: Sure, go ahead Lynsey.

Lynsey: Sure, so what Rockefeller is looking for you to send them is the submission that you sent to HUD for your unmet need for your 45-day threshold review as well as the HUD

response letter that you received, so that they can compare what you sent versus what the HUD response was. Once again, you can send that to Resilience.Academy@RockFound.org. Once again, that's going to help to tailor the technical assistance moving forward. And then, we will also ask that they provide a read receipt for any submissions that they do receive. If you haven't received one yet, one will be coming.

Meg: As you see here, and we will be sending out a pdf of the slides from this webinar. Also they'll be posting the recording, so you can look forward to getting those. But you see here. We also have links to; hopefully you're very familiar with these now.

The Grants.gov website where you can download the NOFA. The NOFA website on HUD exchange with a lot of resources including the webinar series that has recordings, live transcripts, and everything you could ever hope for, data resources about the data that we are providing relative to this NOFA to which we've referred today as well. Also the resilient recovery website has a whole lot of information and research on disaster resilience that you can use as you're looking into ways to rebuild resiliently.

Jessie: Do we have any other questions from anybody? Anybody wants to give us another question in the...

Meg: There are no more questions. We have exhausted the queue.

Jessie: Well we are always there at the ResilientRecovery@HUD.gov.

George: It looks like might have just had a more.

Meg: Oh, there we go. Somebody just came in.

George: No. It's just somebody saying thank you to us.

Jessie: We're happy to do the-- We learned a lot really, really fast drinking from the fire hose.

Meg: We will be back on Thursday.

Jessie: And we'll be back on Thursday to talk specifically about unmet recovery needs and how to get through that particular threshold alone. We're working as fast as we can on doing this technical amendment. As I said, it'll go out through Grant.gov. Those of you who got your NOFAs at Grants.gov, and clicked the box that let it send you email updates, will get an email update. Everybody else you just like lurk. We'll get it up as soon as we can as soon as I can get the signatures. Todd agrees to it. Don't you Todd?

Todd: Always.

Jessie: Yes, there we go. Well, thank you very, very much. This has been a really interesting webinar. We got a lot of great questions, and we'll be back Thursday.

Meg: Just as a reminder, do you have any questions going forward about the NOFA itself, technical questions about what's in the NOFA, what the requirements of the NOFA are, you need to send them to the ResilientRecovery@HUD.gov. Someone from HUD will respond to you. Usually it's Jessie because we all have to ask her anyway.

Meg: Yeah. Make sure that if you have any followup questions, or also show up on Thursday when we'll be covering unmet recovery need, which I think is the harder one. We'll look forward to that in two days from now. Thanks every one.

Jessie: Thank you.