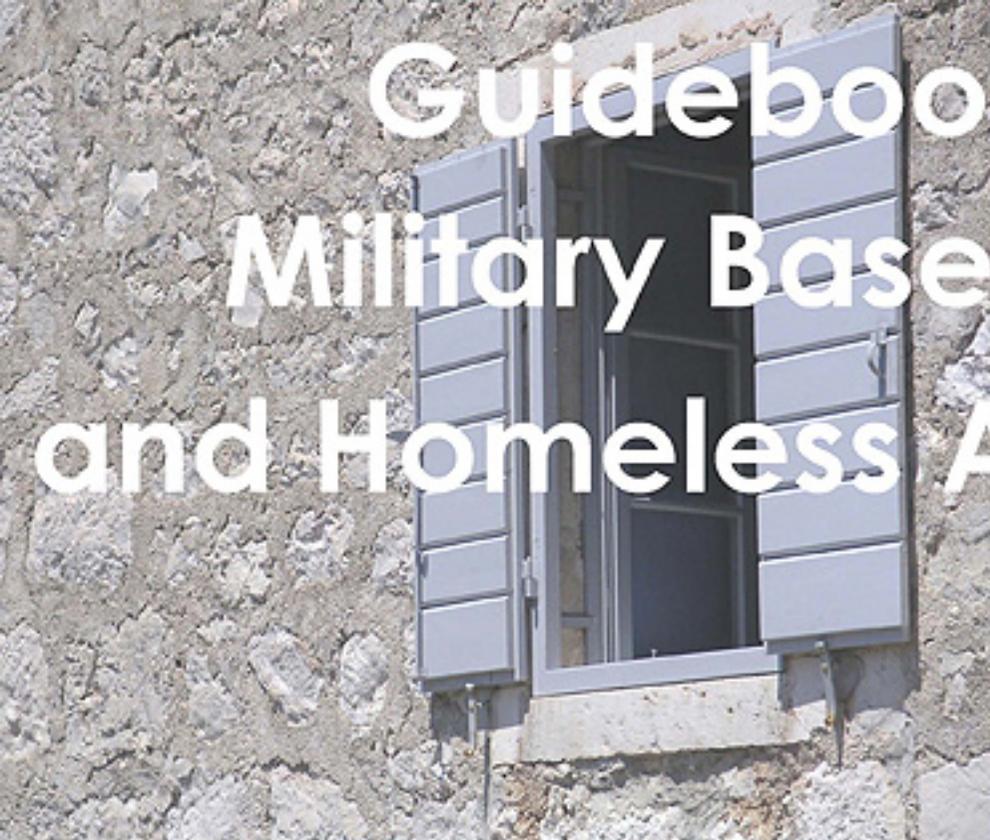


Guidebook on Military Base Reuse and Homeless Assistance



U.S. Department of Housing and Urban Development
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Section 1: Introduction

For more than four decades, the U.S. Department of Defense (DoD) has closed or realigned military installations to reduce overhead, enhance readiness and modernization, and adjust to the realities of changing international relations. The resulting impact on surrounding communities is often dramatic. Many communities have successfully converted these former installations to civilian uses such as parks and other recreational facilities, business centers, market-rate housing, affordable housing, and transitional housing for homeless persons. Since the late 1980s, the base closure process and the role of local communities in planning for their transition to civilian use have evolved significantly.

In 1987, Congress enacted the Stewart B. McKinney Homeless Assistance Act. Title V of that Act made serving the homeless the first priority for use of all surplus Federal properties, including military installations. Congress did not anticipate the scope of military base closures and realignments nor how the Title V priority of the McKinney Act would affect reuse of the installations.

In 1988, the Secretary of Defense chartered the first Defense Base Closure and Realignment Commission (BRAC Commission). The BRAC Commission recommended closing 86 installations and the partial closure or realignment of 59 others. The Base Closure and Realignment Act of 1990 established the first independent commission “to provide a fair process that will result in the timely closure and realignment of military installations inside the United States.” This law authorized the creation of an independent BRAC Commission to recommend installation realignments and closures in 1991, 1993, 1995, and now 2005.

Early in the 1990s, most individuals involved in base reuse concluded that Title V of the McKinney-Vento Act did not adequately address all multiple interests related to large parcels of surplus Federal properties such as military bases. Therefore, in 1994, DoD; the U.S. Departments of Housing and Urban Development (HUD), Veterans Affairs (VA), and Health and Human Services (HHS); the General Services Administration (GSA); and homeless assistance providers and other community groups recommended changes to the McKinney Act that led to enactment of the **Base Closure Community Redevelopment and Homeless Assistance Act of 1994** (the **Redevelopment Act**). The Redevelopment Act, which was amended in 1996, remains in effect and governs the 2005 installation realignments and closures.

The President approved the 2005 BRAC Commission recommendations on September 8, 2005. Those approved recommendations were sent to the Congress on September 23, 2005 and became law on November 9, 2005.

The Redevelopment Act

The Redevelopment Act was designed to accommodate the impacted communities' multiple interests in base reuse and to meet the national priority to assist homeless individuals and families. The law exempted BRAC Commission installations from the provisions of Title V of the McKinney Act and substituted a community-based process wherein representatives of the homeless and other community groups participate in local reuse planning.

The Redevelopment Act places responsibility for base reuse planning in the hands of a Local Redevelopment Authority (LRA), which represents all the local jurisdictions affected by a closing or realigning installation. The LRA is responsible for developing a reuse plan that appropriately balances the needs of the various communities for economic redevelopment, other development, and homeless assistance. HUD then reviews the plan to determine its compliance with the statute.

Implementation of the Redevelopment Act

HUD's Office of Community Planning and Development (CPD) and DoD's Office of the Assistant Secretary for Economic Security jointly developed and published regulations that implement the Redevelopment Act. The regulations, although identical, are found in two locations. HUD's regulations are codified at 24 CFR 586 and DoD's version is found at 32 CFR 176.

This guidebook was developed to anticipate and answer potential questions about the Redevelopment Act. It explains the base redevelopment planning process, the requirements and guidelines for submission of applications, and HUD's review process. However, this guide is not an exhaustive reference. Other issues germane to the base reuse process are addressed in two DoD documents:

- *Responding to Change: Communities & BRAC* provides practical, early-on advice for local and State officials and the general public. It encourages early organization, thorough planning, and actual implementation of redevelopment plans. Copies may be obtained from DoD's Office of Economic Adjustment by calling (703) 604-6020 or online at <http://www.oea.gov>.
- *The Base Redevelopment and Realignment Manual* describes the procedures to transition installations from military to civilian use and ensures a common approach is used by all the components of DoD. Copies may be obtained online at <http://www.dtic.mil/whs/directives> or from the U.S. Department of Commerce, National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161, and (703) 487-4600.

Other primary sources of BRAC information can be located online at the BRAC Commission website at: <http://www.brac.gov> or DoD's website at <http://www.defenselink.mil>.

Section 2: Overview of the Base Redevelopment Process

This section discusses the objectives of the Redevelopment Act. Information on participants and the major steps involved in base redevelopment is explained, as is HUD's role in the BRAC process.

Objectives of the Redevelopment Act

The Redevelopment Act has three primary objectives:

- To balance a community's expressed needs for economic redevelopment and other development with the expressed needs of the homeless individuals and families in the vicinity of the installation.
- To ensure that base reuse planning is directed by local communities in the vicinity of the installation via empowerment of a locally controlled redevelopment planning authority.
- To promote rapid reuse of closing or realigning military installations by establishing timelines or deadlines for each stage of the process.

Applicability

The Redevelopment Act applies to all installations approved for closure in 2005.

Collaborators in the Base Reuse Process

Representatives of the local community working with Federal and State officials, private sector representatives, and homeless assistance providers attempt to develop a balanced reuse plan that reflects local needs. The role played by each of these partners is described briefly in the following paragraphs:

Local Participants

Local Redevelopment Authority (LRA). The LRA is any authority or instrumentality established by State or local government and recognized by the Secretary of Defense through its Office of Economic Adjustment (OEA) as the entity responsible for developing the reuse plan or for directing implementation of the reuse plan. Established by the local community and recognized by OEA, LRAs must allow the community maximum public input during its deliberations. The community in the vicinity of an installation is defined as the political jurisdiction(s), other than the State, that comprise the LRA for the installation. If no LRA is formed at the local level and the State is serving in

that capacity, then the community in the vicinity of the installation is deemed to be the political jurisdiction(s) in which the installation is located.

Public agencies and private nonprofit organizations. Public agencies and private nonprofit organizations are often eligible for one of several public benefit conveyance programs that make surplus properties available at up to a 100-percent discount of fair market value. Surplus military property may be conveyed to these public agencies and private nonprofits to provide vital public services such as education, health care, homeless services, parks and recreation, law enforcement, prisons, self-help housing and transportation.

Homeless assistance providers. These participants may include State or local government agencies or private nonprofit organizations that provide or propose to provide assistance to homeless persons and families. Representatives of the homeless seek buildings and properties that may provide supportive services, job and skills training, employment programs, shelter, transitional housing, permanent housing, food and clothing banks, treatment facilities, or any other activity that clearly meets an identified need of the homeless and fills a gap in the local Continuum of Care. The Continuum of Care is discussed in greater detail in Section 3.

Private entities. Private entities may range from multinational corporations to small businesses that, in most cases, are critical to a community's economic recovery from base closure or realignment. Private companies are frequently interested in the reuse potential for surplus base buildings and property.

Federal Participants

DoD. The Office of Economic Adjustment (OEA) is the DoD office responsible for recognizing the LRA. It also provides planning grant funds to those LRAs for which it determines base closure will cause direct and significant adverse consequences, or to those for which the Military Department is required, under the National Environmental Policy Act of 1967, to undertake an Environmental Impact Statement (EIS). An OEA Project Manager is assigned to each of these installations as a facilitator and catalyst to the community's planning process.

Other DoD participants are the U.S. Army Corps of Engineers, the Navy Facilities Engineering Command, and the Air Force Base Conversion Agency, which dispose of surplus property following consultations with the LRA and consideration of the approved reuse plan. In addition, Base Transition Coordinators (BTCs) and BRAC Environmental Coordinators (BECs) work as troubleshooters and ombudsmen to help the LRAs navigate the stages of closure and environmental restoration.

HUD Headquarters and Field Offices. In Headquarters, the Office of Community Planning and Development (CPD), Office of Special Needs Assistance Programs carries out HUD's BRAC process responsibilities. HUD Field Offices will provide technical assistance to LRAs and homeless assistance providers throughout the planning process.

HUD Headquarters and Field CPD Office staff each review the reuse plan (see Appendix 1 for a list of HUD's Field CPD Offices).

HUD's Role in the BRAC Process

HUD reviews the application that the LRA submits to HUD and DoD. An application consists of the redevelopment plan and the homeless assistance submission. HUD's review determines whether:

- The application is complete.
- The LRA has followed the process required by the Redevelopment Act and the regulations (24 CFR 586) when preparing the plan and homeless assistance submission.
- The plan takes into consideration the size and nature of the homeless population in the vicinity of the installation.
- The plan takes into consideration the availability of existing services to meet the needs of the homeless.
- The plan takes into consideration the suitability of the buildings and property on the installation for use and needs of the homeless.
- The plan takes into consideration the economic impact of proposed homeless assistance on communities in the vicinity of the installation, including whether the plan is feasible, and whether the selected NOIs are consistent with the Consolidated Plan or other housing, social service, community, or development plan.
- The legally binding agreements specify the manner in which property will be made available, include all documents necessary to complete the transaction, include all appropriate terms and conditions, address environmental contingencies, stipulate timely transfer, and are accompanied by legal opinion.
- The plan appropriately balances the needs for economic and other redevelopment with the needs of the homeless for the communities within the vicinity of the installation.
- The plan was developed in consultation with homeless service providers.

HUD is available to provide technical assistance to the LRA and may negotiate and consult with the LRA before or during its preparation of the reuse plan. Field CPD Office staff can help link the LRA with homeless assistance providers, provide guidance on the process mandated by the Redevelopment Act, and facilitate linkage of the LRA and homeless assistance providers to sources of funding for reuse projects.

Major Steps of the Base Redevelopment Process

Step 1: Approval of BRAC Recommendations for Closures or Realignments

The base redevelopment process formally begins with the President's approval of the BRAC Commission recommendations. The President approved the 2005 BRAC Commission recommendations on September 8, 2005. Those approved recommendations were sent to the Congress on September 23, 2005 and became law on November 9, 2005, when Congress did not pass a resolution of disapproval within 45 legislative days of presidential approval

Step 2: Federal Screening for Potential Federal Reuse

Once the 2005 BRAC Commission's list became law on November 9, 2005, Federal agencies and departments had first choice for use of the excess military installations. Federal interests were to have been formally applied for within 60 days of the closure approval date. The Military Department is to make all surplus determinations not later than May 9, 2006, which is 6 months following the closure approval date. The Federal screening process is officially complete once the Military Department publishes its list of surplus buildings and properties in the Federal Register. The lists are also available on the military department BRAC websites.

Step 3: DOD's Recognition of the LRA

Concurrent with the Federal screening process, the community forms the LRA. DoD, through OEA, must officially recognize the LRA. OEA notifies the community of its recognition in writing and publishes the name, address, and point of contact for the LRA in the Federal Register and in a newspaper of general circulation in the community in the vicinity of the installation. LRA information is also available online at www.oea.gov.

Step 4: LRA's Outreach Actions

Once the Military Department publishes the list of surplus buildings and properties, the LRA must advertise their availability in a newspaper of general circulation within the vicinity of the installation. The advertisement must include the time period during which it will receive notices of interest (NOIs) from homeless assistance providers and State and local governments (see pages 12 and 13 for additional information).

Step 5: Completion of the Redevelopment Plan and the Homeless Assistance Submission

When the LRA completes its outreach process, it has up to 270 days to generate a redevelopment plan and a homeless assistance submission (see Section 4). The LRA must determine which NOIs, if any, to support with some combination of buildings, property, and/or funding. The LRA is required by the Redevelopment Act to negotiate with those homeless assistance providers who submit NOIs. These negotiations are brought to closure through the development of legally binding agreements (see Section 4), which

may differ substantially from the initial NOI. These agreements are then submitted as part of the homeless assistance submission.

The LRA must periodically make drafts available to the public for review and comment as the LRA prepares the redevelopment plan and homeless assistance submission. Once the redevelopment plan and the homeless assistance submission are completed, the LRA must hold at least one public hearing to receive input on these documents. The LRA must comply with applicable local law or ordinances regarding the formality of public hearings and may revise the plan and homeless assistance submission in accordance with issues raised at the hearing.

As part of its application to HUD, the LRA must include a summary of public comments received during the process of developing the plan and homeless assistance submission. Many LRAs choose to include copies of written comments received and transcripts of hearings to avoid charges that the LRA has misrepresented the public's comments. The LRA shall submit the final redevelopment plan and the homeless assistance submission to the local HUD Field Office; HUD Headquarters in Washington, D.C.; OEA, and the Military Department.

Step 6: HUD's Review

The Redevelopment Act mandates that HUD review the redevelopment plan and the homeless assistance submission within 60 days of HUD's receipt of a complete application. The required elements of a complete application are listed on the HUD Completeness Review Checklist in Section 5 (HUD's Review). To expedite review of your application, send your application with the Completeness Review Checklist you have filled out on top, serving as an index to your application. Do not send incomplete applications. HUD may negotiate and consult with the LRA at any time during its review and will notify the LRA of its determination or, where applicable, of any further steps the LRA should take.

Step 7: Military's Disposal of Buildings and Property

The Military Department must complete an environmental review of the installation in compliance with Federal environmental laws. Transfer of properties to the intended recipient will occur only after this review process is completed.

For on-base buildings and properties committed to homeless assistance providers, the transfer will be made in compliance with the approved application, either to the LRA or directly to the homeless assistance providers.

Waiver Requests

Approval of any request for waiver of the BRAC time limitations is not automatic. If the LRA needs additional time to complete its application, the LRA may request a waiver to extend or postpone the deadlines. If the LRA shows **good** cause, the Assistant Secretary of Defense for Economic Security may grant such a request if it is deemed in the best

interest of the community. Requests must be submitted, before the deadline sought to be extended, to the following address:

Director, Office of Economic Adjustment
U.S. Department of Defense
400 Army-Navy Drive, Suite 200
Arlington, VA 22202

In addition, HUD's Assistant Secretary for Community Planning and Development may waive certain nonstatutory requirements in the regulations, except for deadlines and actions required by DoD. To determine those requirements, LRAs should contact their local HUD Field Offices. Direct requests for these waivers to the following address:

Assistant Secretary for Community Planning and Development
U.S. Department of Housing and Urban Development
ATTN: BRAC Coordinator
451 7th Street SW., Room 7266
Washington, DC 20410

Required LRA Outreach Activities

Newspaper Advertisement

Formal outreach to public and homeless interests must begin no later than 30 days after the date on which the Military Department publishes the list of available surplus buildings and properties in the *Federal Register*. Within 30 days of the Military Department's advertisement, the LRA must publish a newspaper advertisement requesting Notices of Interest (NOIs) in the buildings and properties on the installation. The outreach process begins with the publication of the LRA advertisement and ends on the deadline date as stated in the newspaper advertisement for submission of NOIs to the LRA.

Advertisements initiated by the Military Department for surplus buildings and property are not substitutes for this requirement. The advertisement must state a definitive period of not less than 90 days nor more than 180 days for homeless assistance providers or State and local entities to express interest in the property. Because the advertisement should appear in a section of the paper that has high visibility, the legal or classified sections generally should be avoided (see next page for a sample advertisement). LRAs should also simultaneously advertise for NOIs from public and nonprofit entities interested in obtaining property via a public benefit conveyance.

Note that the sample on the following page is for your consideration only. The Redevelopment Act places responsibility for base reuse planning in the hands of the LRA. The sample is designed to assist LRAs in developing their own advertisement, which will require modification as dictated by local circumstances.

**Availability of Surplus Federal Property to
State and Local Eligible Parties,
Including Homeless Service Providers
(Name of LRA)**

As required by the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, as amended (the Redevelopment Act) and its implementing regulations, the (insert LRA name)(the LRA) for (insert name of installation) is seeking notices of interest (NOIs) for surplus property at the installation.

State and local governments, homeless service providers and other interested parties may submit NOIs no later than 5 p.m. on (date) 2006. A listing of surplus property at (installation) was published by the Department of the (Service) in the *Federal Register* on (date). The complete listing can be obtained by calling the LRA contact person identified below.

NOIs for homeless assistance may be submitted by any State or local government agency or private nonprofit organization that provides or proposes to provide services to homeless persons and/or families residing in (list municipalities and counties comprising the LRA).

A workshop will be held at the (location), on (date) at (time), which will include an overview of the base redevelopment planning process, a tour of the installation, information on any land use constraints known at the time, and information on the NOI process. To register for this workshop, please call the LRA contact person identified below by (date). Attendance at this workshop is not required to submit an NOI, but is highly encouraged.

NOIs from homeless service providers must include: (i) a description of the homeless assistance program that the homeless service provider proposes to carry out at (location); (ii) a description of the need for the program; (iii) a description of the extent to which the program is or will be coordinated with other homeless assistance programs in the communities in the vicinity of (installation); (iv) information about the physical requirements necessary to carry out the program, including a description of the buildings and property at (installation) that are necessary in order to carry out the program; (v) a description of the financial plan, the organizational structure and capacity, prior experience, and qualifications of the organization to carry out the program; and (vi) an assessment of the time required to commence carrying out the program.

Entities interested in obtaining property through a public benefit conveyance (PBC), other than a homeless assistance conveyance, are invited to contact the following Federal agency offices to find out more about each agency's PBC program and to discuss with the agency the entity's potential for qualifying for a conveyance of property. Federal agencies sponsoring PBCs include the Department of the Interior for parks, recreation, wildlife conservation, lighthouses, and historic monuments uses; the Department of Education for educational uses; the Department of Health and Human Services for public health uses; the Department of Justice for correctional facilities and law enforcement uses; the Department of Housing and Urban Development for Self-Help Programs; the Department of Transportation for airports and seaports; the Veterans Administration for cemeteries; and the Federal Emergency Management Agency for emergency management purposes. A complete listing of the Federal agencies with PBC programs with specific points of contact is available from the LRA.

NOIs for PBCs must include: (i) a description of the eligibility for the proposed transfer, (ii) the proposed use of the property, including a description of the buildings and property necessary to carry out such proposed use, (iii) time frame for occupation, and (iv) the benefit to the community from such proposed use, including the number of jobs the use would generate.

For additional information or to register for the workshop, contact (LRA contact person) at (address and phone number).

Workshop

Early in the outreach process and in coordination with HUD and the Military Department, the LRA shall conduct at least one workshop on the installation. The goals of these workshops are to:

- Inform homeless and public interest groups about the closure/realignment and property disposal process.
- Allow groups to tour the buildings and properties available.
- Explain the LRA's process and the schedule for receiving NOIs.
- Discuss any known land-use constraints affecting the available property and buildings.

Direct Outreach

LRAs shall meet with homeless assistance providers expressing interest in properties on or off the installation. The LRA must submit to HUD a list of providers that were consulted throughout the reuse planning process.

Outreach Area and Effort

The Redevelopment Act specifies that outreach to homeless assistance providers must extend to the community in the vicinity of the installation—defined as the jurisdictions that constitute the LRA. For example, if the LRA's Executive Committee is composed of city and county representatives, the official area for outreach includes the geographic area of the city and county and the homeless assistance providers that serve persons residing within those two jurisdictions. For assistance in defining the catchment area, LRAs should contact the HUD Headquarters Office listed in Appendix 1.

As long as the LRA meets the minimum standard, it may extend its outreach efforts as widely as it wishes to private or public interest groups both within and outside the local community.

A jurisdiction that receives Community Development Block Grant funds as a member of an urban county (as defined by HUD) should examine how housing and services for the homeless are provided within the county. If the homeless service system is countywide, these LRAs should consider extending their outreach to all the communities that constitute the urban county.

Public Benefit Transfers

Eligible units of State and local governments and certain nonprofit organizations may acquire surplus real property for public benefit uses at discounts of up to 100 percent.

Public benefit conveyance categories include parks and recreation, historic monuments, airports, health, education, correctional facilities, highways, self-help housing and wildlife conservation. Under the public benefit programs, eligible entities must apply to a sponsoring Federal agency. For example, if a city wanted to obtain surplus Federal property for use as a college, it would make an application to the Department of Education.

The regulations encourage LRAs to work with federal agencies that sponsor public benefit transfers for public and private interests at the same time that the LRA is conducting its homeless outreach. However, the Federal District Court for the District of Columbia has ruled that the homeless and public benefit outreach processes are parallel tracks that must be carried out before HUD can make a determination on an application. HUD recommends that all LRAs publicly solicit notices of interest for public benefit transfers at the same time the LRA solicits notices of interest for homeless assistance uses. HUD will require evidence that outreach for public benefit transfers has taken place as a condition to approval of your application.

Format for Public Benefit Transfer NOIs

No prescribed format is required for these NOIs. They should specify the name of the entity and the specific interest in property or facilities along with a description of the planned use. Additionally, each sponsoring Federal agency has its own application requirements.

Format for Homeless Assistance Provider NOIs

NOIs from homeless assistance providers must be more specific. They must contain at least:

- A description of the need for the program (See Continuum of Care discussion in Section 3).
- A description of the proposed homeless assistance program, including the specific proposed reuse of properties or facilities, such as supportive services, job and skills training, employment programs, emergency shelters, transitional or permanent housing, food and clothing banks, treatment facilities, or other activities that meet homeless needs.
- A description of the extent to which the program is or will be coordinated with other homeless assistance programs in the communities in the vicinity of the installation (see the discussion of the Continuums of Care in Section 3).
- Information about the physical requirements necessary to implement the program, including a description of the buildings and property at the installation that are proposed to carry out the program.

- A description of the homeless assistance provider who is submitting the notice, its organizational and legal capacity to carry out the program, and its financial plan for implementing the program.
- An assessment of the time required by the homeless assistance provider to carry out the program.

LRAs may require more information, if reasonably related to the proposed reuse.

Frequently Asked Questions:

Do all closing/realigning installations have LRAs?

No. LRAs are formed *only* if buildings and properties on the installation will be available for local use (declared surplus) as the result of a closure or realignment. Some base closures/realignments involve the relocation of personnel and may not affect the overall need for buildings and properties. On some occasions, other Federal agencies obtain the excess buildings and property during Federal screening.

Is HUD involved in all closing/realigning installations?

No. Under the Redevelopment Act, HUD has a statutory mandate to review the reuse plan for closing/realigning BRAC Commission installations that have a recognized LRA. Therefore, HUD has no formal role in base redevelopment if:

- The installation is not a BRAC Commission closure/realignment action.
- The installation contains no surplus property.

Does the Redevelopment Act cover all installations regardless of size?

The Redevelopment Act applies to all military installations regardless of their size, location, or complexity. HUD acknowledges that a community's response to base redevelopment will vary according to the size, location, and complexity of the installation. HUD recognizes that LRA applications developed for major installations, which may encompass thousands of acres, will be more lengthy and complicated than 3-or 4-acre reserve facilities that contain few buildings. Each application, however, must address all the elements required by statute or regulations.

For example, an LRA located in a small rural community having a small homeless population will not be held to the same level of detail in its submission as will an LRA in a large metropolitan area with a large homeless population. Ultimately, LRAs must

follow the process stipulated in the Redevelopment Act and submit applications that balance the expressed needs of the community for economic redevelopment, other development, and homeless assistance.

What organizations are eligible to obtain property for homeless assistance?

Governments and private nonprofits that serve the homeless or propose to serve the homeless are eligible to receive base property under a no cost homeless assistance transfer. Note that homeless assistance transfers are not available for general relief of the poor or for those who are temporarily dislocated due to disaster. Only those organizations that propose to serve homeless persons meeting the McKinney-Vento Act definition are eligible to receive a no cost transfer. HUD will review the LRA application and the NOIs that are proposed to receive property to determine that the organizations slated to receive property for homeless assistance purposes qualify.

Can organizations that have never served the homeless before get no-cost transfers for homeless assistance?

Yes, however, they must propose to serve homeless on the property and should be able to show their capacity to carry out the proposed project.

What is the McKinney-Vento Act definition of homeless?

The term “homeless” or “homeless individual or homeless person” includes:

- (1) An individual who lacks a fixed, regular, and adequate nighttime residence; and
- (2) An individual who has a primary nighttime residence that is—
 - (a) A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - (b) An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - (c) A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

It does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law. Neither does it include people living in overcrowded or substandard housing.

What organizations are eligible to obtain property under public benefit transfers?

There are a number of public benefit transfers available through different federal agencies. They include transfers for airports, schools, prisons, parks and recreation, public monuments, health care uses and self-help housing development. For more information on public benefit transfers, please see:

<http://www.propertydisposal.gsa.gov/Property/PubBenefitProp/>

What can an LRA do to speed up the HUD review process

- Accept Technical Assistance.
- Submit a complete application.
- Don't just submit the bare bones.
- Use your application as an opportunity to "make your case" to HUD. Explain your reasons for accepting and rejecting each homeless NOI and make sure HUD knows what informed your decision-making. Explain why you think you met all the review criteria, in particular, why your plan is balanced.
- Describe the process used to make decisions on NOIs and explain why it is a fair and equitable process.

Section 3: The Consolidated Plan and the Continuum of Care

This section discusses the Consolidated Plan and the Continuum of Care and how each can facilitate the base reuse planning process.

The Consolidated Plan

A Consolidated Plan is developed by each State and local government receiving grant funds from HUD under four formula grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Shelter Grants (ESG).

In developing its Consolidated Plan, the State and local governments are required to consult with community-based organizations, businesses, nonprofit organizations, and other entities that provide housing and housing services. The Consolidated Plan is primarily an affordable housing plan that describes housing needs (including needs of the homeless) and market conditions and sets forth a strategic plan with housing priorities and objectives. The Consolidated Plan serves as application for the four formula programs and sets forth how the funds will be used. Consolidated Plans also include a non-housing community development plan and identify specific long-term and short-term community development objectives, including economic development activities that create jobs. These are developed in accordance with the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons. A Consolidated Plan may also include neighborhood revitalization strategies for jurisdictions that elect to carry out a revitalization strategy in one or more neighborhoods. Some State and local consolidated plans are available from HUD online at: <http://www.hud.gov/offices/cpd/about/conplan/local/index.cfm>. Other Consolidated Plans may be available on the State or local government's web site. In developing a base reuse plan, the diversity of interests and the needs of the community must be balanced. Achieving this balance requires broad-based strategic planning that will lead to the integration of the military property into the local community.

The Consolidated Plan is particularly useful in base reuse planning because it summarizes the housing needs of the community, the current inventory of services to address those needs, and the gaps that remain between the need and the current inventory. It consists of the following elements:

- A thorough assessment of housing needs, including the needs of the homeless, and available resources.
- A 3- to 5-year strategy to address priority needs and objectives with a timetable to achieve those objectives.

- An annual funding plan specifying projects and activities the jurisdiction will undertake with funds from the four HUD formula programs.

Using the Consolidated Plan for Reuse Planning

The Consolidated Plans of the community or communities that constitute the LRA are significant existing tools for base reuse planning. HUD encourages their use for:

- An assessment of affordable housing and homeless needs.
- Statements of local priorities for projects serving individual neighborhoods or the community as a whole. The LRA can learn about projects and areas receiving or targeted to receive assistance, including projects in neighborhoods in the vicinity of the installation.
- Surveys of the neighborhoods in the vicinity of the installation through use of the GIS Boundary Files and Enterprise Geographic Information System (EGIS) mapping software.
- An estimate of the number of homeless persons and families in the community.
- Identification of homeless assistance providers in the community in the vicinity of the installation.
- Gaps in the current homeless services system.

Helpful Resource Tables in the Consolidated Plan

- Table 1A: Homeless Gap Analysis and Population/Subpopulations Charts;
- Table 1B: Special Needs (Non-Homeless);
- Table 1C: Summary of Specific Homeless/Special Needs Objectives.
- Table 2A: Priority Housing Needs;
- Table 2B: Priority Community Development Needs;
- Table 2C: Summary of Specific Community Development Objectives; and
- Table 3: Action Plan Projects

For additional information regarding the Consolidated Plan see:

<http://www.hud.gov/offices/cpd/about/conplan/index.cfm>

Other Local Plans are Useful, too

HUD also encourages use of additional planning documents, such as:

- Strategic plans from Empowerment Zones/ Enterprise Communities.
- Plans for economic development completed by State or local economic development authorities, councils of government, municipal or county government planning agencies, or chambers of commerce.
- Plans for transportation, affordable housing, parks and recreation, and public works that have been developed by special purpose districts, selected State or local agencies, or nonprofit organizations.
- State or local ten year plans to end chronic homelessness, particularly as coordinated with the local Continuum of Care plan.
- Functional plans and specific proposals for shelter providers, homeless assistance coalitions, or religious organizations.

Although these plans often contain information relevant for preparing the redevelopment plan and the homeless assistance submission, HUD would be in a position to question information from a source that contradicts information in the Consolidated Plan.

Means to Assess Homeless Needs without Consolidated Plans

Jurisdictions should use other local planning documents, mentioned in the previous paragraph, to describe information about the current homeless services system and the need that currently is not being met. LRAs that represent these jurisdictions are not required to conduct surveys of the homeless population. The LRA may use the statements of need provided in the NOIs.

The Continuum of Care and Reuse Planning

Addressing homelessness through permanent solutions is one of HUD's top priorities. To that end, the Department has worked toward achieving this goal by encouraging a community-based process that provides a comprehensive response to the homeless population's different needs. This approach—a Continuum of Care—assesses needs, inventories resources, identifies gaps, and coordinates public and private resources to fill in the gaps and avoid duplication. Sections in the Consolidated Plan are devoted to the needs, inventory of resources, and gaps in the homeless Continuum of Care.

A local Continuum of Care plan submitted to HUD typically includes the following components:

- Outreach and assessment to identify an individual's or family's needs and make connections to facilities and services.
- Immediate shelter and safe, decent alternatives to the streets.

- Transitional housing and necessary social services to include job training and placement, substance abuse treatment, short-term mental health services, and independent living skills.
- Permanent housing or permanent supportive housing arrangements.

Helpful Resource Forms in the CoC Application

- Service Activity Chart – This is an inventory of the supportive services available to persons who are experiencing homelessness.
- Housing Activity Charts - These charts are project-by-project listings of the current and “in development” inventory of emergency, transitional, and permanent housing. These charts also include information on the unmet need for housing in the area.
- Homeless Populations and Subpopulation Chart – Based on an annual count and other source documents, this chart details the number of homeless persons and then further details the specific subpopulations, such as persons with mental illness, substance abuse, etc.
- Homeless Management Information Chart (HMIS) – The HMIS is a computerized data collection application designed to capture client-level information over time on the numbers, characteristics, and service needs of homeless persons.

Section 4: The Redevelopment Plan and Homeless Assistance Submission

This section defines the redevelopment plan, homeless assistance submission, and the public comment submission requirements. It also discusses resources that may facilitate the local reuse planning process.

Materials to be Submitted to HUD and to the Military Department

The LRA must submit the following three items:

- The redevelopment plan.
- The homeless assistance submission.
- A summary of public comments on both documents.

The Redevelopment Plan

The Redevelopment Act describes the redevelopment plan as “a conceptual land-use plan prepared by the recognized LRA to guide local reuse of the former military installation.” It is a strategic plan for the reuse of an entire installation. The redevelopment plan must explain the proposed reuses of the military installation and how this reuse will achieve a balance in responding to the community’s needs. No specific format is required; it may include statistics, graphics, maps, narrative descriptions, or other materials.

Homeless Assistance Submission

The homeless assistance submission consists of the following five components. Refer to the Redevelopment Act or the regulations if additional clarity on the submission is needed.

- 1. Information about homelessness**
- 2. Notices of Interest (NOIs)**
- 3. Legally Binding Agreements**
- 4. Balance**
- 5. Outreach**

Component 1 - Information about homelessness in the communities within the vicinity of the specific military installation - Obtain information from the Consolidated Plan and/or other local planning documents. Explain how this information was taken into consideration in developing the plan. Different scenarios are provided, illustrating how communities of different sizes might collect information:

Scenario A: Large communities. The submission from the LRA for a large (HUD entitlement) community shall include:

- Two tables from the Consolidated Plan: Table 1, Homeless and Special Needs Population. Table 2, Priority Homeless Needs Assessment.
- The narrative sections of the Consolidated Plan that reference these tables. The narrative must describe the community's homeless assistance needs, the current inventory of homeless facilities and services, and the identified gaps in the Continuum of Care. LRAs may need to submit materials from more than one Consolidated Plan if the LRA covers multiple jurisdictions.

Scenario B: Communities that are cities within an urban county (as defined by HUD). Submissions from the LRAs for these communities shall include:

- All the information under Scenario A.
- A discussion of the homeless needs/inventory/gaps described in the Consolidated Plan and how they apply to the specific jurisdiction(s) that are in the vicinity of the installation.

Scenario C: Communities located within a jurisdiction that does not prepare a Consolidated Plan. These jurisdictions primarily represent rural communities.

The LRAs for these communities shall submit:

- A description of the homeless population it perceives to be present in the community. LRAs that represent these jurisdictions are not required to conduct surveys of the homeless population.
- A brief inventory of existing services and homeless facilities to serve that population.
- A description of the unmet needs within the context of existing facilities and information on services to move the homeless toward self-sufficiency, within the context of a Continuum of Care approach.

Component 2 - Notices of Interest (NOIs) - This section of the submission shall include:

- A copy of each NOI sent to the LRA by those providers that propose homeless assistance activities.
- A description of the NOIs being supported with buildings, property, and/or funding and an explanation for this support. Also to be included are explanations of why the remaining NOIs were not selected, such as adverse impact on the community, lack of financial resources or capacity, and/or inconsistency with the Consolidated Plan.
- A description of the impact that selected NOIs will have on the community in the vicinity of the installation, addressing the following questions:

- Will the selected NOIs affect the character of existing neighborhoods adjacent to the properties proposed to assist the homeless? What impact will the NOIs have on schools, social services, transportation systems, and infrastructure?
- Will the selected NOIs have the adverse effect of concentrating minorities and/or low-income persons in the vicinity of the installation?
- Will the community in the vicinity of the installation ensure that general services such as transportation, police, fire, water, sewer, and electricity are available in conjunction with the proposed homeless assistance activities?

Refer to the Redevelopment Act or the regulations for additional clarity on the NOIs.

Component 3 - Legally Binding Agreements.

Each NOI selected for homeless assistance must be finalized in legally enforceable documents, referred to as the legally binding agreements (LBAs). The LBAs are the concrete result of negotiations between the LRA and the homeless assistance provider. HUD recommends that both parties engage legal counsel to negotiate and draft LBAs. The homeless assistance project described in the LBAs may differ from the NOI submitted by the homeless assistance provider. However, the LBAs must both commit the LRA to fulfilling the homeless assistance component of the redevelopment plan and commit the homeless assistance provider to carry out the proposed activity. In the future, if either the LRA or the homeless assistance provider fails to fulfill its commitment, the other should be able to enforce the contract through legal action.

Although the LBAs need not be executed when submitted to HUD, they must include all documents legally required to complete the transactions necessary to realize the homeless uses described in the plan upon which balance is predicated. The LBAs may commit properties on or off the base, funding, services, or some combination of these.

Key Elements of the Legally Binding Agreement

- If base property is being transferred to a provider, the LBA will include the contract, proposed deed or lease and any restrictive covenants.
- If base property is being transferred to a provider, the LBAs must contain a process for negotiating alternative arrangements if an environmental analysis indicates that property identified for transfer is not suitable for the intended purpose. The parties should seek functional equivalence in alternative property.
- If the LRA has agreed to make payments in lieu of providing property, the LBAs should explicitly stating the source and amount of funds, the payment schedule, and the purpose for which the funds will be used.
- If property yet to be identified off base is to be offered, the LBA will adequately describe the requirements for the property (size, zoning, etc), when it will be transferred, and what will happen if suitable property is not found within a specified time period.
- The LBAs must provide for reversion or transfer of the property to the LRA or another entity if the homeless assistance provider ceases to use the property for homeless assistance.
- The LBAs must be accompanied by a legal opinion of the chief legal advisor(s) to the LRA or the political jurisdiction(s) that will be executing the LBAs. The legal opinion will state that, when executed, the LBAs will constitute legal, valid, binding and enforceable obligations on the parties.
- If the LBAs are not executed when submitted to HUD, they must be accompanied by a letter from the chief executive officer of the homeless assistance provider stating that the provider has agreed to the terms.
- LBAs may not be conditioned upon the subsequent approval of any other federal agency.

Component 4 – Balance

The LRA shall discuss (1) how the reuse plan balances the need for economic redevelopment, other types of development, and homeless assistance in the community in the vicinity of the installation, and (2) how this plan is consistent with the Consolidated Plan and other existing housing and community development plans adopted by the jurisdictions in the communities served by the LRA.

Component 5 - Outreach

The LRA shall include the following items in this portion of the submission:

- A listing of all jurisdictions in the area served by the LRA, describing the required catchment area for outreach to homeless assistance providers.
- A copy of the newspaper advertisement placed by the LRA, including the name of the newspaper(s) and date(s) of publication.
- A listing of homeless assistance providers that the LRA has consulted during the process of preparing its application.
- A description of the outreach efforts made to homeless assistance providers in the community in the vicinity of the installation.
- A description of the workshop conducted on the installation during the outreach period.

Public Comment Requirements

Because the Redevelopment Act supports a locally controlled reuse process, the LRA must ensure that the local community has an opportunity to be involved in the planning process. Therefore, the LRA must:

- Provide an overview of the citizen participation process.
- Make the draft redevelopment plan and homeless assistance submission available for public review and comment throughout the application preparation process.
- Conduct at least one public hearing on the application prior to its submittal and include a summary of citizens' comments as part of the redevelopment plan and the homeless assistance submission.

Application Submission Format Requirements

The LRA may submit these documents in any format it wishes, providing that they contain all of the required elements (conceptual land-use plan, homeless outreach efforts, information on homelessness, NOIs, legally binding agreements, and demonstration of balanced reuse).

Resources to Facilitate the Reuse Planning Process

Consolidated Plan and Continuum of Care

Most localities have already developed these two planning documents. Therefore, LRAs do not have to “reinvent the wheel” as they plan an installation’s reuse (for example, conduct homeless surveys or community development needs assessments). These documents can provide valuable insights into current efforts, including any shortcomings.

Local HUD Field Office

To ensure that documents are complete and to avoid unnecessary delays in HUD's approval process, the LRA, homeless assistance providers, and other interested parties should contact local HUD Field CPD Offices for information and assistance. The LRA should contact HUD Field CPD Office personnel early in its planning process to help prepare the redevelopment plan and homeless assistance submission (see Appendix 1 for a listing of HUD Field CPD Offices).

Mailing List of Homeless Assistance Providers

By providing the ZIP codes of communities in their required outreach area to the HUD Field CPD Offices, LRAs may obtain mailing lists of homeless assistance providers from HUD's database of those providers located in the vicinity of specific installations. The lists can be generated in a variety of formats (for example, address labels or alphabetized lists).

HUD Field Offices Assistance to Communities & LRAs

HUD Field Offices can provide the following assistance:

- Explain the Consolidated Plan and describe how this document can facilitate base reuse planning.
- Identify the communities with Consolidated Plans.
- Provide demonstrations of the Consolidated Plan mapping software.
- Explain the concept of a Continuum of Care system and describe how the homeless needs/inventory/gaps assessment in local homeless assistance efforts can be useful.
- Explain the base reuse process.
- Facilitate the LRA's outreach efforts by providing lists of homeless assistance providers. This information can be obtained from HUD, which maintains a national providers database that can be sorted by ZIP code.
- Provide reminders about environmental issues that must be considered when providing housing and services to homeless individuals and/or families.
- Discuss HUD programs and other Federal resources that are available to help finance the renovation and operation of homeless assistance projects as well as other community and economic development projects (see Appendix 2 for HUD programs).

Final Submission of Application to HUD

One copy of the LRA application, consisting of the redevelopment plan, the homeless assistance submission, and the summary of the public comments on both documents are sent to HUD Headquarters, the local HUD Field Office, and to the local HUD Field Office.

Two Copies to: **HUD Headquarters:**

Assistant Secretary for Community Planning and Development
U.S. Department of Housing and Urban Development
ATTN: BRAC Coordinator
451 7th Street SW., Room 7266
Washington, DC 20410

One Copy to: **HUD Field CPD Office** (See Listing in Appendix 1)

One Copy to: **Military Department** (Send to the appropriate military district office.)

Section 5: HUD's Review

HUD must receive the redevelopment plan and homeless assistance submission no later than 270 days from the deadline for receipt of NOIs. HUD's Base Redevelopment Team in Washington, D.C., and the appropriate local HUD Field Office review these documents and together formulate a determination.

HUD will conduct the described in the program regulations as 24 CFR 586.35, including a three-pronged evaluation:

1. **Completeness Review.** HUD determines whether the redevelopment plan and the homeless assistance submission contain all required elements (see Section 4). If any materials are omitted, HUD's local Field Office will contact the LRA.
2. **Balance Review.** During its review, HUD will ask several questions regarding:
 - Outreach to homeless assistance providers. Was adequate information and assistance given to the community of local homeless assistance providers to participate in the development of the application? Did they have adequate time and help in responding to the solicitation for NOIs?
 - Impact. Does the overall reuse plan consider the economic impacts of homeless assistance activities proposed in the application?
 - Need. Does the reuse plan consider the size and nature of the local homeless population and the availability of necessary services and facilities for a Continuum of Care?
 - Consistency. Is the reuse plan consistent with the Consolidated Plan or other planning documents adopted by the community?
 - Balance. Does the reuse plan achieve an appropriate balance between the expressed needs of homeless assistance providers and the needs of the communities served by the LRA for economic development and other development?

3. **Enforceability review.**

HUD will determine whether the LRA adequately addressed NOIs received from homeless assistance providers relative to NOIs received from other interests in the community and developed a balanced plan that addresses some of the various needs within the community.

HUD will communicate with the LRA throughout the planning process as well as during its review of the application via its local Field Office. The Field Office may contact the LRA to obtain clarification and/or to request additional information. HUD will complete its review within 60 days of the application's receipt.

Adverse Determinations - LRA's Initial Application

HUD must notify the LRA and DoD of its preliminary determination. If the application is found to be deficient, HUD must send to the LRA:

- A summary of deficiencies.
- An explanation of the overall determination.
- A statement explaining how the LRA may overcome any deficiencies and change the overall determination.

The LRA may submit a revised application within 90 days. Within 30 days of receipt of these materials, HUD must provide a written notification to the LRA as to its final determination.

Adverse Determinations – LRA's Revised Application

If the final determination regarding the LRA's application is not favorable or the LRA fails to resubmit a revised application, HUD will work directly with homeless assistance providers who have expressed interest in the use of installation buildings and properties. In these instances, the Redevelopment Act provides for HUD to determine the information necessary for homeless assistance providers to submit an application to HUD. The Department will evaluate the financial and other capacities of various homeless assistance organizations to carry out programs for the reuse of installation buildings and properties.

Not later than 90 days after HUD receives the revised redevelopment plan and homeless assistance submission, HUD will notify DOD and the LRA of the buildings and properties that are suitable to use for homeless assistance. HUD also will notify DoD of the extent to which the revised plan meets the review criteria.

DOD will consult with both HUD and the LRA in considering HUD's recommendations. DOD will incorporate HUD's recommendations where appropriate and consistent with the best use of the installation as a whole, taking the LRA's overall reuse plan into account.

Completeness Review. The following pages contain the HUD Completeness Review Checklist that is used to determine if an application is complete. It may be helpful for LRAs to use it as well.

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Base Closure Community Redevelopment and Homeless Assistance Act

**Redevelopment Plan and Homeless Assistance
Submission Completeness Review**

Name of the Installation

Name of the Local Redevelopment Authority

	Yes	No	N/A
Redevelopment Plan			
1. Does the LRA Application include a redevelopment plan for the installation?			
Outreach to Homeless Assistance Providers			
2. Does the LRA Application include a list of the political jurisdictions that comprise the LRA?			
3. Does the LRA Application include a copy of the LRA newspaper advertisement from a newspaper of general circulation in the vicinity of the installation?			
3.a. Did the newspaper advertisement announce the receipt of notices of interest for a minimum of 90 days, maximum 180 days?			
4. Does the LRA Application provide a list of homeless assistance providers consulted during the outreach process?			
5. Does the LRA Application discuss the LRA’s overall efforts of outreach to homeless providers in the community in the vicinity of the installation?			
6. Does the LRA Application discuss the workshop that was conducted during the outreach period?			
Information about Homeless in the Vicinity of the Installation			
7. Is there a list of all the political jurisdictions that comprise the LRA?			
7.a. Does the LRA Application include copies of the appropriate Consolidated Plan(s) Tables 1 and 2 along with appropriate narrative? LRAs that represent cities within urban counties should comment on how the Consolidated Plan applies to their particular jurisdiction.			
7.b. If the community in the vicinity of the installation is not an entitlement city or a city in an urban county, did the LRA provide information on the homeless population?			

	Yes	No	N/A
Notices of Interest (NOIs)			
8. Does the LRA include a copy of each NOI received from homeless providers (this includes both approved and disapproved NOIs)?			
8.a. Does the LRA explain why each NOI from a homeless assistance provider was either approved/disapproved?			
Legally Binding Agreements (LBAs)			
9. Does the LRA Application include an LBA for each of the selected NOIs with homeless assistance providers?			
9.a. Does each LBA for property have an ‘environmental renegotiation’ clause (586.30(b)(3)(i)), i.e., does each LBA provide for a process for negotiating alternative arrangements that would enable the same balance of interests made originally in the event that an environmental review conducted subsequent to HUD approval indicates that any property identified for transfer in the agreement is not suitable for the intended purpose?			
9.b. Does each LBA have a ‘Reverter’ clause (586.30(b)(3)(i) and 586.45(e)), i.e., when an LBA discusses on-base property awards, does it provide for the reversion or transfer, either to the LRA or to another entity or entities, of building and property in the event they cease to be used for the homeless?			
10. Does the LRA application discuss how the LBA(s) with homeless providers meet gap(s) in the continuum of care?			
11. Does the LRA application discuss how the LBAs may/may not impact the community in terms of:			
11.a. the impact the homeless housing and services provided through the LBA(s) might have on the community?			
11.b. the concentration of homeless/low income individuals and families in the community?			
11.c. availability of general services in support of the homeless persons or families served by LBA(s)?			
12. Are the LBAs executed?			
If unexecuted: 12.a. Are LBA acceptance letters provided from each non-profit with an LBA?			
If unexecuted: 12.b. If the non-profit is an umbrella or consortium organization, did the provider organizations consent to the arrangement with the umbrella/consortium and LRA as reflected within the LBA?			
13. Has the LRA’s or political jurisdiction’s chief legal counsel provided an opinion for LBA(s) as to their enforceability under State law (586.30(b)(3)(i)?			

	Yes	No	N/A
Balance between Economic Redevelopment, Other Development, and Homeless Assistance			
14. Does the LRA Application discuss how the LBAs are the consistent with Consolidated Plan?			
14.a. Does the LRA Application relate the LBAs to the priorities discussed in the Consolidated Plan?			
14.b. Does the LRA Application describe how it balances the needs for economic redevelopment, other development, and homeless assistance?			
Public Comment Requirements			
15. Does the LRA Application provide an overview of the citizen participation process?			
15.a. Does the LRA Application provide information on the public hearing?			
15.b. Does the LRA Application include a summary of the comments from the public hearing on the draft application?			
Public Benefit Transfer Outreach			
16. Does the LRA Application contain evidence that public benefit transfer outreach was conducted?			

Field Office Review completed by: _____ on _____
Name Date

Headquarters Review completed by: _____ on _____
Name Date

Section 6: Model Base Reuse Plans

This section describes several model reuse plans that an LRA may follow for balancing the needs of the homeless with other needs in the community. These may be used as best practices/lessons learned from 1995 and later Base Closure actions. As the process begins, LRAs and homeless assistance providers may find it helpful to reach out to communities that have gone through the process for advice and tips. In addition, a number of successful strategies have emerged over the past three BRAC rounds that have worked to make the process run more smoothly and helped produce positive outcomes to address homelessness in their community. This chapter will outline some strategies that both LRAs and homeless assistance providers have used successfully to balance the various needs in the community including the need of the homeless.

Case Studies

In this section, three case studies highlight how these communities negotiated the BRAC process, successfully balancing the needs of the homeless in their community with other needs in their community. As you will see, these communities developed different mechanisms and processes that drew heavily from their community's strengths in order to organize, plan and implement a base reuse plan that successfully transitioned installations from military to civilian use. The communities highlighted were chosen to provide examples from rural, small cities, and suburban settings.

Naval Station Roosevelt Roads (Puerto Rico)

Summary

In late September 2003, the U.S. Congress directed the Secretary of the Navy to close the Naval Station Roosevelt Roads in Puerto Rico. This base closure process was not part of one of the previous BRAC closure rounds. The naval station was a sprawling 8,600-acre site located in a rural part of Puerto Rico. The base contained over 3,600 acres of land available for reuse and over 1,600 facilities. Since the naval station was located in a rural part of the island, the Commonwealth of Puerto Rico took the lead in the redevelopment process appointing the Department of Economic Development and Commerce as the LRA. The Commonwealth and the LRA saw the closure of the naval station as a significant opportunity for economic development and job creation that would benefit all the citizens of Puerto Rico.

Planning Process

Early on in the process, the LRA designated its General Counsel to lead and organize the planning process to incorporate the needs of the homeless within the larger redevelopment effort. Identifying leadership and accountability as the process begins is important to ensure that the process runs smoothly and speaks with a single voice.

The LRA's first step in addressing the needs of the homeless was to assess the homeless situation in the communities in the vicinity of installation. Since the naval station was located in a rural area, the LRA analyzed the homeless situation in two small towns (Ceiba and Naguabo). Using the most recent Puerto Rico Balance of State Continuum of Care application, the LRA determined that there was a small homeless population in these towns - 36 individuals. In addition, the LRA found that the homeless were younger and had a higher representation of women than in the rest of the Commonwealth.

As a next step the LRA, working with the HUD Field CPD Office, initiated outreach to engage the homeless assistance providers in the two communities. The LRA made a presentation at a meeting of the Coalition of Coalitions (Puerto Rico's Homeless Planning Organization) hosted by HUD in San Juan.

In addition the LRA, with HUD's assistance, hosted two workshops for homeless assistance providers and other community organizations to explain the process for homeless projects and public benefit conveyances. Within these workshops, the LRA clearly explained the distinction between a project serving the homeless and a project serving the public, i.e., a public benefit conveyance. Ensuring the community had a good understanding of the difference early in the process prevented any misunderstandings and potential grievances later in the evaluation and selection process. These workshops also included tours of the base to view available facilities and learn about any land use restraints. In the second workshop, the LRA reviewed the Notice of Interest (NOI) Process and provided a recommended format for the Notice of Interest.

The LRA received two NOIs clearly labeled as being for homeless assistance. The LRA review committee reviewed both proposals. The review committee selected a transitional housing project planning to serve 6 homeless women who are victims of domestic violence and their families proposed by a local homeless assistance agency (Casa de la Bondad). The review committee felt that this project helps fill a significant gap in the Community's continuum of care. The review and selection process went smoothly with no opposition from the broader community. After the selection process, the LRA developed and submitted their application to HUD in December of 2004.

Successful Outcome

Casa de la Bondad's transitional housing project will serve 6 homeless women who are victims of domestic violence and their families. The project will occupy 6 housing units (4 BR) in the Nimitz housing complex. The LRA entered into a legally binding agreement (LBA) with Casa de la Bondad. As part of the LBA, a contingency process was established for negotiating alternative arrangements, i.e., site or compensation) if the identified site is deemed unsuitable based upon the results of an environmental review to be conducted by the Navy. The homeless service provider is currently working to implement the program.

Project Contact: Michelle Smith
HUD Puerto Rico Field Office
787-766-5400, Ext. 2084

Roosevelt Roads Reuse Plan Website:
<http://www.planrooseveltroads.com/english/index.html>

Key West Naval Air Station (Florida)

Summary

The Key West Naval Air Station was designated for realignment under BRAC 1995. As part of this process, the Department of the Navy identified certain parcels of land and facilities on the naval station as surplus. In 1996, the City of Key West, a small city with a population of approximately 27,000 citizens, established the Key West Local Redevelopment Authority (LRA) to develop a reuse plan for this excess property. The Key West economy is primarily oriented towards services and retail businesses which are part of its vibrant tourism industry. In addition, Key West's housing market has become increasingly dominated by outside investors and the seasonal home market. As a result, there is a recognized need for affordable housing opportunities targeted to year round residents. Finally, Key West's homeless assistance providers, through its Homeless Coalition, used the potential availability of property from the naval station consolidation to undertake a planning process of their own to determine the met and unmet needs of the homeless throughout Key West. Within this context, the LRA began the redevelopment planning process seeking to balance the economic redevelopment and housing needs of the community with the needs of the homeless.

Planning Process

The LRA retained the assistance of an experienced architectural and planning firm to assist with the overall reuse plan. The LRA began the process by assessing the specific needs of the homeless in the City of Key West. Key West is a small city and a Consolidated Plan was not available from which to draw information and data. The LRA collected information and data from the Monroe County Continuum of Care and interviewed government officials and homeless assistance providers. In addition, the LRA drew from the Homeless Coalition's Plan 1999 – The Homeless Element of the Key West Comprehensive Community Plan (Plan 1999) that identified the homeless community's met and unmet needs. As a result of this analysis, the LRA estimated the homeless population in Key West to be 147 individuals, broken down between 103 individuals and 44 individuals in homeless families. It is important to note that the LRA collaborated closely with the Key West's Homeless Coalition and the Continuum of Care in this analysis of need and the estimate of the number of homeless within Key West.

In response to the advertisements for surplus properties at the naval station, thirty-five notices of interest (NOIs) including nine homeless NOIs were received by the LRA. The LRA organized an extensive citizen participation process to evaluate the NOIs and determine the proposed uses of the surplus property. The LRA retained the Florida Conflict Resolution Consortium (an independent, non-partisan, arbitration organization) to facilitate public participation meetings which included priorities forums, design charettes and alternatives generation workshops. Homeless coalition members participated actively in every meeting of the citizen participation process. Homeless assistance providers felt that their sustained participation within the process, i.e., attending all LRA-sponsored meetings was crucial to ensuring that the final plan effectively addressed the needs of Key West's homeless.

As a result of the extensive community process, the LRA and the community determined that the Poinciana housing site, which contained 212 units of existing military housing on

36 acres, presented the best opportunity to “achieving the communities goals and objectives.” The LRA’s redevelopment plan for the site proposed 228 units of housing, including 50 units targeted for the homeless (i.e. 25% of the Poinciana units). The LRA felt that these 50 units targeted for homeless individuals and families proactively addressed gaps in the Continuum of Care for specific homeless sub-populations within the context of the “overriding need for affordable housing”. In coming to this agreement, both the LRA and the Homeless Coalition felt that the reuse plan could not address every gap or need within the Continuum but could achieve a reasonable balance of addressing the needs of the homeless with other needs in the community, such as affordable housing and economic development.

To simplify the process and establish a clear line of responsibility and accountability for the redevelopment of the site, the City of Key West and the LRA developed a master development agreement with the Key West Housing Authority (KWH.A.) In turn, KWH.A negotiated with organizations that submitted NOIs to determine which homeless assistance providers would implement the activities. This negotiation was a collaborative process with the Southernmost Homeless Assistance League (formerly known as the Homeless Coalition) identifying the agencies. Once the organizations were identified, KWH.A entered into legally binding agreements (sub-leases) with the seven homeless assistance providers.

Successful Outcome

The Reuse Plan for surplus properties at the naval station resulted in 50 units of transitional and permanent housing targeted to specific homeless sub-populations identified by the Homeless Coalition’s Plan 1999.

Below is a summary of the homeless projects created by the Key West’s Base Reuse Plan:

- 10 units of transitional/short-term housing for homeless men with substance abuse issues;
- 8 units of transitional housing for homeless families;
- 18 units of transitional/permanent housing for homeless men and women with substance abuse and mental health issues;
- 10 units of transitional housing for homeless families who are victims of domestic violence; and
- 4 units of transitional housing for homeless individuals who are physically disabled.

The Poinciana Housing site is surrounded by a fairly dense residential community. At the beginning of the process, there was strong opposition to homeless projects from the surrounding community. The homeless providers countered this opposition through coordinated engagement, educating the community about the details of each proposed project and convincing them that the homeless assistance providers had the capacity and experience to be good stewards. The homeless providers engaged the community and its concerns through monthly meetings. Over time, the homeless providers addressed most if not all community concerns. As a result, the community’s opposition diminished and was transformed eventually to overall support for these homeless projects.

In implementing these projects, the Rural Health Network (RHN) played an important leadership role coordinating the development efforts of the seven projects as well as providing technical assistance to the homeless assistance providers that had little to no development capacity or experience. The coordination of development activities amongst these projects and the provision of specialized technical assistance included:

- Environmental Considerations - The RHN collected all available environmental reports on the properties designated for the homeless projects as well as researched and accessed grant funding for lead and asbestos remediation.
- Coordination of Continuum of Care and State Funding – Recognizing that there were not enough funding resources for all the projects in one year, the RHN developed a funding plan that phased funding requests to HUD over a multi-year period.
- Technical Assistance Regarding Rehabilitation Activities – The RHN assisted several homeless assistance providers by completing rehabilitation, assisting them with funding, and retaining competent contractors. In addition, KWHA assisted the providers by providing them with detailed cost estimates for the needed rehabilitation work.
- Infrastructure Costs - The RHN, the homeless assistance providers, the City of Key West and KWHA worked to develop successful strategies to address infrastructure costs in turn reducing the cost to the homeless projects. In order to address sewer service and needed roadwork, a larger City replacement project was able to address the needs of the homeless projects. In terms of water connection, the projects were able to take advantage of recent upgrades accomplished by the Navy.

As a result of this balanced process, there are currently seven projects providing 50 units of transitional housing for a variety of homeless sub-populations including veterans, families, victims of domestic violence as well as homeless individuals.

Project Contact: Sandy Higgs
Formerly of the Rural Health Network
305-296-6227

Memphis Defense Depot (Tennessee)

Summary

The Memphis Defense Depot was closed in the 1995 BRAC round, and comprised almost 700 acres and over 130 buildings of various types (i.e. warehouses, maintenance buildings and other support buildings). The depot also included eight duplex housing units in four structures.



The Memphis Defense Depot is located in an industrial section of Memphis adjacent to the local airport. The City of Memphis and Shelby County created a joint local

agency named the Memphis Depot Redevelopment Agency as the Local Redevelopment Authority (LRA). The LRA's mission focused on a redevelopment plan that created economic development opportunities and replaced jobs that were lost due to the closing. The LRA clearly understood the need to identify all the communities in the vicinity of the installation by including both the City of Memphis and Shelby County within the larger Redevelopment Plan.

Planning Process

In order to effectively determine the needs of the homeless, the LRA reviewed the Consolidated Plans of both the City of Memphis and Shelby County. In this analysis, the LRA determined that the greatest need was for transitional housing serving both homeless individuals and families. Early on, the LRA made a deliberate decision to create an inclusive process reaching out to both the local homeless coalition named the Partners For the Homeless (The Partners) and the City of Memphis' Division of Housing and Community Development (DHCD). Both of these organizations played an important role in developing and refining the process to engage, assess and select homeless project(s) for inclusion within the overall Redevelopment Plan. The Partners assisted the LRA outreach to the community's homeless assistance providers. DHCD was particularly helpful in identifying and engaging the specific homeless assistance providers that had the capacity and experience to effectively implement and operate a new homeless project. Through its experience administering the HOME and CDBG programs as well as organizing the McKinney-Vento homeless funding, DHCD was well aware of the community's homeless assistance providers, their current strengths and weaknesses and each agency's capacity to implement and operate a new homeless project. The LRA felt that this detailed knowledge was especially helpful in evaluating proposals from these homeless assistance providers.

The LRA enlisted both the Partners and DHCD in drafting the formalized Request for Notices of Interest (NOIs). The Request for NOIs contained background regarding the redevelopment process at the Memphis Depot; a description of the properties made available; a description of the evaluation criteria; a description of the evaluation process and an outline of the application requirements to submit a NOI for a homeless project. Once this document was developed, the LRA advertised the solicitation by public notice

and sent invitations to over sixty local homeless assistance providers for a briefing and tour of the facility. Thirty-seven organizations and eight public agencies attended the briefing and tour. During the period of time that potential applicants were given to prepare their NOIs, the LRA offered the opportunity for an additional tour and consultation to interested agencies on a request basis. The LRA received six NOIs – five from local homeless assistance providers and one from the Department of Veterans' Affairs.

The LRA continued to include both the Partners and DHCD in the screening and evaluation process. A review committee from the Partners (who were not associated with any of the NOIs submitted) initially assessed and ranked each NOI based upon the established evaluation criteria recommending specific homeless projects to the LRA. The DHCD reviewed NOIs, assessing the capacity of the homeless assistance providers. The LRA then selected two homeless projects for inclusion in the Redevelopment Plan. The projects were an affordable rental housing project for eight homeless families to be operated by the Metropolitan Inter-Faith Association (MIFA) at the former officer housing (4 duplex buildings) and a specialized job training and supported work program operated by the Memphis Leadership Foundation (MLF).

The LRA entered into a legally binding agreement (LBA) with MIFA that provides for a transfer of the four duplex houses, adjacent parking and related land (6 acres). The LRA entered into a short-term, five-year lease for the selected warehouse building and adjacent land to MLF since the Redevelopment Plan calls for the building to be demolished for future development. At the time, the LRA was committed to working with the MLF to identify a more permanent site for this valuable program. After the selection process and execution of these agreements with the homeless assistance providers, the LRA developed the Homeless Assistance Plan and submitted it to HUD for approval.

After the LBA was executed, MIFA chose not move forward with the implementation of the project. The LRA quickly initiated a second solicitation using the exact same selection process, again collaborating with the Partners and DHCD. The Partners evaluated and ranked all NOIs recommending a transitional housing project for homeless veterans proposed by Alpha Omega Veterans Services. Alpha Omega proposed a transitional housing program at the site (4 duplex buildings) of the former officers housing. After independently reviewing the NOIs with DHCD, the LRA accepted the Partner's recommendation and selected Alpha Omega Veterans Services. The LRA then contacted HUD and amended their Homeless Assistance Plan and executed an LBA with Alpha Omega Veterans Services.

In the implementation stage, the LRA continued to work collaboratively with Alpha Omega identifying funding to create a separate entrance to the transitional housing program and provide a fence around the 6-acre property. The LRA facilitated the hookups with the utility companies, but Alpha Omega was responsible for the cost.

Successful Outcome

Alpha Omega Veterans Services currently provides eight units of specialized transitional housing for homeless veterans. Through private fundraising efforts, the agency was able to cover all project startup costs to include utility hookups and minor renovations. Alpha Omega's Board of Director was actively involved throughout the acquisition and

implementation process. The Memphis Leadership Foundation continues to offer the specialized job training and supported work program producing wooden pallets for commercial use by private companies at the Memphis Depot. Working collaboratively with the LRA and its Board of Directors, the MLF was able to find a permanent home for the training program at the Memphis Depot entering into a reasonable long-term lease with a private industrial company that had some extra space. These homeless assistance providers did not experience any opposition from the surrounding community due to the small scale of the projects and the fact that the projects were naturally buffered by the industrial nature of the larger site.

Project Contacts:

Jim Covington
President, Memphis Depot
1-901-942-4939

Cordell Walker
Executive Director, Alpha Omega Veterans Services
901-726-5678

Memphis Depot Website:

<http://www.memphisdepot.net>

Alpha Omega Veterans Services Website:

<http://www.aovs.org>

Appendix 1: HUD Contacts

HUD Headquarters:

U.S. Department of Housing and Urban Development
Office of Special Needs Assistance Programs
BRAC Coordinator
451 Seventh Street, SW, Room 7266
Washington, DC 20410

HUD CPD Field Offices:

All CPD field offices are listed here for reference. LRAs should contact the field office closest to the affected installation. Local HUD Field office information is also available on the HUD Website at: <http://offices/cpd/about/staff/fodirectors/index.cfm>.

**Community Planning and Development Field Office
Contact Information**

New England			
Field Office	Address	Phone Number	Fax Number
Hartford Field Office	1 Corporate Center Hartford, CT 06103-3220	(860) 240-4800 ext. 3059	(860) 240-4857
Manchester Field Office	Norris Cotton Federal Bldg. 275 Chestnut St. Manchester, NH 03101-2487	(603) 666-7510 ext. 3017	(603) 666-7644
Boston Regional Office	10 Causeway Street Boston, MA 02222-1092	(617) 994-8357	(617) 565-5442
New York / New Jersey			
Buffalo Field Office	Lafayette Court 465 Main Street 5th Floor Buffalo, NY 14203-1780	(716) 551-5755 ext. 5800	(716) 551-5634 or 4789
Newark Field Office	One Newark Center 13 th Floor Newark, NJ 07102-5260	(973) 622-7900 ext. 3300	(973) 645-4461
New York Regional Office	26 Federal Plaza Suite 3541 New York, NY 10278-0068	(212) 264-2885 ext. 3401	(212) 264-0993
Mid-Atlantic			
Baltimore Field Office	10 South Howard St. 5 th Floor Baltimore, MD 21201-2505	(410) 962-2520 ext. 3071	(410) 962-7250
Philadelphia Regional Office	The Wanamaker Bldg 100 Penn Square, East Philadelphia, PA 19107-3380	(215) 656-0626 ext.3201	(215) 656-3442
Pittsburgh Field Office	339 Sixth Avenue 6 th Floor Pittsburgh, PA 15222-2515	(412) 644-2999	(412) 644-2678 or 6499
Richmond Field Office	600 East Broad Street Richmond, VA 23219-4320	(804) 771-2100 ext. 3766	(804) 771-2284
Washington, DC Field Office	820 First St NE Suite 300 Washington, DC 20002-4205	(202) 275-9200 ext. 3163	(202) 275-4190

Southeast / Caribbean			
Field Office	Address	Phone Number	Fax Number
Birmingham Field Office	950 22 nd St. North Suite 900 Birmingham, AL 35203-5302	(205) 731-2630 ext. 1027	(205) 731-2388
San Juan (Caribbean) Field Office	171 Carlos E. Chardon Ave. San Juan, PR 00918-0903	(787) 766-5400 ext. 2005	(787) 766-5107
Miami Field Office	909 SE First Ave. Miami, FL 33131	(305) 536-4431 ext. 2223	(305) 536-4781
Atlanta Regional Office	40 Marietta St. Five Points Plaza Atlanta, GA 30303-2806	(404) 331-5001 ext. 2449	(404) 331-6997
Jacksonville Field Office	301 West Bay Street Suite 2200 Jacksonville, FL	(904) 232-1777 ext. 2077	(904) 232-3617
Louisville Field Office	601 West Broadway Louisville, KY 40202	(502) 582-6163 ext. 200	(502) 582-5300
Jackson Field Office	McCoy Federal Bldg 100 W. Capitol St. Room 910 Jackson, MS 39269-1096	(601) 965-4700 ext. 3140	(601) 965-5912
Greensboro Field Office	Asheville Building 1500 Pincroft Rd Greensboro, NC 27407-3707	(336) 547-4006	(336) 547-4148
Columbia Field Office	1835 Assembly St. 13th Floor Columbia, SC 29201-2480	(803) 765-5564	(803) 253-3426
Knoxville Field Office	710 Locust Street, SW Suite 300 Knoxville, TN 37902-2526	(865) 545-4391 ext. 125	(865) 545-4575

Midwest			
Field Office	Address	Phone Number	Fax Number
Chicago Regional Office	Ralph Metcalfe Federal Bldg. 77 W Jackson Blvd Chicago, IL 60604-3507	(312) 353-6236 ext. 2713	(312) 353-5417
Indianapolis Field Office	151 N Delaware St. Suite 1200 Indianapolis, IN 46204-2526	(317) 226-6303 ext. 6790	(317) 226-6317
Detroit Field Office	477 Michigan Ave Detroit, MI 48226-2592	(313) 226-7900 ext. 8059	(313) 226-6689
Minneapolis Field Office	Kinnard Financial Center 920 Second Ave S. Minneapolis MN 55402	(612) 370-3019 ext. 2107	(612) 370-3093
Columbus Field Office	200 North High St Columbus, OH 43215-2463	(614) 469-5737 ext. 8248	(614) 469-2237
Milwaukee Field Office	310 W Wisconsin Avenue Room 1380 Milwaukee, WI 53203-2289	(414) 297-3214 ext. 8100	(414) 297-3202
Southwest			
Little Rock Field Office	425 West Capitol Avenue Suite 900 Little Rock, AR 72201-3488	(501) 324-6375 ext. 3300	(501) 324-5954
New Orleans Field Office	Hale Boggs Building 501 Magazine Street 9th Floor New Orleans, LA 70130-3099	(504) 589-7214 ext. 1047	(504) 589-4089
Albuquerque Field Office	625 Silver Ave SW Suite 100 Albuquerque, NM 87102	(505) 346-7361	(505) 346-6604
Oklahoma City Field Office	500 W. Main St Suite 400 Oklahoma City, OK 73102-2233	(405) 609-8569	(405) 553-7574
San Antonio Field Office	One Alamo Center 106 S. St. Mary's St. San Antonio, Texas 78205	(210) 475-6821	(210) 472-6825
Houston Field Office	1301 Fonnin St Suite 2200 Houston, TX 77002	(913) 718-3199	(913) 551-5859
Ft. Worth Regional Office	801 Cherry St. PO Box 2905 Ft. Worth, TX 76113-2905	(817) 978-5951	(817) 978-5559

Great Plains			
Field Office	Address	Phone Number	Fax Number
Kansas City Regional Office	400 State Ave Room 200 Kansas City, KS 66101-2406	(913) 551-5485	(913) 551-5859
Omaha Field Office	10909 Mill Valley Road Suite 100 Omaha, NE 68154-3955	(402) 492-3147	(402) 492-3163
St. Louis Field Office	1222 Spruce St Suite 3207 St. Louis, MO 63103-2836	(314) 539-6533	(314) 539-6818
Rocky Mountain			
Denver Regional Office	1670 Broadway Denver, CO 80202-3607	(303) 672-5414 ext. 1326	(303) 672-5028
Pacific/Hawaii			
San Francisco Regional Office	600 Harrison St. 3 rd Floor San Francisco, CA 94104-1300	(415) 489-6568	(415) 489-6601
Honolulu Field Office	500 Ala Moana Blvd. Suite 3A Honolulu, HI 96813-4918	(808) 522-8180 ext. 264	(808) 522-8194
Los Angeles Field Office	611 W.6th St. Ste.800 Los Angeles, CA 90017	(213) 894-8000 ext. 2555	(213) 894-8122
Phoenix Field Office	One N. Central Ave Suite 600 Phoenix, AZ 85004	(602) 379-7175	(602) 379-4431
Nevada Field Office	Foley Building, Ste. 2900 300 Las Vegas Blvd. Las Vegas, NV 89101	(702) 366-2100	(702) 388-6244
Northwest/Alaska			
Anchorage Field Office	3000 C Street Suite 401 Anchorage, AK 99503-4399	(907) 677-9890	(907) 271-3667
Portland Field Office	400 SW 6th Ave. Suite 700 Portland, OR 97204-1632	(503) 326-7018	(503) 326-3684 or 4065
Seattle Regional Office	909 First Ave. Suite 200 Seattle, WA 98104-1000	(206) 220-5268	(206) 220-5403

Appendix 2: HUD Funding for Homeless Assistance Programs

HUD currently administers three primary competitive programs that provide assistance to help fill gaps in the local Continuum of Care system. Each year, HUD awards funding for these programs through a single competitive application process. For example, in FY 2005, HUD awarded over \$1.1 billion among these three programs for Continuum of Care systems. In FY 2006, HUD is expecting to award approximately \$1.2 billion.

A brief description of each competitive program follows. For more information on how to apply for each, contact the local HUD Field Office listed in Appendix 1. The HUD CPD Field Office can also explain how the four HUD formula programs (CDBG, HOME, HOPWA, and ESG) can be used to fund homeless housing and service programs.

Supportive Housing Program (SHP)

Program. The Supportive Housing Program is designed to promote the development of supportive housing and supportive services, including innovative approaches assisting homeless persons in the transition from homelessness and enabling them to live as independently as possible. SHP funds may be used to provide transitional housing, permanent housing for persons with disabilities, and supportive services.

Eligible applicants. States, units of general local government, public housing agencies, private nonprofit organizations, and community mental health centers that are public nonprofit organizations are eligible to apply.

Eligible activities. Grantees may use SHP funds to acquire, rehabilitate, or construct structures for use as supportive housing or in providing supportive services; to lease structures for use as supportive housing or providing supportive services; to provide operating costs for supportive housing; and/or to provide supportive services.

Shelter Plus Care Program (S+C)

Program. The purpose of the Shelter Plus Care program is to provide rental assistance for hard-to-serve homeless persons with disabilities in connection with supportive services funded from sources other than this program. Assistance is targeted primarily to homeless persons who are severely mentally ill; have chronic problems with alcohol, drugs, or both; or have AIDS or related diseases.

Eligible applicants. States, units of general local government, and public housing agencies may apply.

Eligible activities. The Shelter Plus Care program provides rental assistance through four

components: tenant-based rental assistance, sponsor-based rental assistance, project-based rental assistance, and rental assistance in connection with the moderate rehabilitation of single-room-occupancy units. Applicants may request assistance for any component.

Section 8 Moderate Rehabilitation Single Room Occupancy (SRO) Program

Program. The purpose of the SRO Program is to provide rental assistance to homeless individuals in connection with the moderate rehabilitation of SRO dwellings. Resources to fund the cost of rehabilitating the dwellings must be from other sources. However, the rental assistance covers operating expenses of the SRO housing, including debt service for rehabilitation financing, provided that the monthly rental assistance per unit does not exceed the moderate rehabilitation fair market rent for an SRO unit, as established by HUD.

Eligible applicants. Private nonprofit organizations and public housing agencies are eligible to apply.

Eligible activities. SRO assistance may be used only for rental assistance and for administering the rental assistance program.