

July 25, 2023

Pamela Williams
Assistant Administrator, Grants Program
Resilience
Federal Emergency Management Agency
500 C St SW
Washington, DC 20024

Re: Request for Information on Community Disaster Resilience Zones and the National Risk Index (FEMA-2023-0009)

Dear Ms. Williams,

The Coastal States Organization (CSO) respectfully submits these comments to the Federal Emergency Management Agency (FEMA) on its Request for Information (RFI) regarding Community Disaster Resilience Zones (CDRZ) and the National Risk Index (NRI).¹ Since 1970, CSO has served as the collective voice for the nation's coastal states, commonwealths, and territories on policy issues relating to coastal, Great Lakes, and ocean management. CSO's governor-appointed delegates – representing state and territory coastal management programs – coordinate with coastal communities, state agencies, federal government, tribal governments, industry, and non-profit organizations for the effective management, protection, beneficial use, and development of the coastal zone through the federal-state partnership established under the Coastal Zone Management Act. Coastal programs across the nation support resilient communities by working on the ground on planning, stakeholder engagement, and project implementation; developing and delivering coastal data; and communicating guidance on federal and state funding sources to develop application-ready projects.

CSO lauds the goal of the CDRZ and NRI to target federal support to communities most in need of assistance for resilience-related activities and assist communities in understanding their risk to natural hazards. CSO offers these comments based on the experience and expertise of state and territory coastal management programs, to contribute to the designation of CDRZ and the evolution and improvement of the NRI as a component of FEMA's critical mission. These comments are offered in addition to and in support of comments submitted by individual states and territories.

Sincerely,



Derek Brockbank
Executive Director

¹ Fed. Emergency Mgmt. Agency, *Community Disaster Resilience Zones and the National Risk Index*, 88 Fed. Reg. 34,171 (May 26, 2023).

A. Risk Assessment – General Questions

(1) How does your organization use risk assessment products and associated risk ratings? What products do you use and why are they useful? How does your organization vet risk assessment tools and products? Are there additional data, information, analysis capabilities, or metrics that would be useful? Are there data that you do not currently have access to, but would like?

[Also responding to Question A(2).]

Coastal states and territories utilize a variety of publicly available risk assessment products to identify areas with high risk to coastal hazards such as flooding. In a 2019 national survey of coastal program staff,² about half of interviewees reported making regular use of FEMA data or tools. FIRMs represent the FEMA tool most commonly used by coastal program staff, but FIRMs are primarily used for general risk communication (i.e., helping communities and homeowners understand NFIP obligations, or for permit or federal consistency compliance), rather than for planning or decision making purposes. A limited number of coastal programs do rely on FIRMs for flood risk planning, as they are the most recent or up to date flood data available; however, most have prioritized developing local flood mapping data that incorporates future conditions. Some coastal program staff have reported accessing NRI data since the web application became fully available in 2021; however, it is likely used secondarily to local flood mapping data and other data tools, such as those from NOAA, that incorporate future risk due to climate change.

Beyond FEMA tools and resources, most coastal programs have indicated that they make use of NOAA data, tools, or trainings available through the Digital Coast. The most frequently cited tools were the Sea Level Rise Viewer and Coastal Flood Exposure Mapper, along with their underlying projections and inundation modelling. For those coastal programs which have developed state-level data, they did not use the Viewer for planning purposes, but cited using it for public awareness or as a “first cut” visualization of a project’s hazard exposure.

The NRI makes a valuable contribution towards the need of integrating physical vulnerability with social vulnerability for planning purposes. However, the NRI in its current form may not provide data at sufficient resolution for community-level decision making. In addition, the lack of future climate projections in the NRI limits its utility in coastal settings. Due to the need to plan for sea level rise and other projected future climate impacts, coastal programs may prefer mapping tools such as NOAA’s Sea Level Rise Viewer and other locally available data when making planning decisions.

Some coastal program staff have expressed concerns about limitations of the CDC Social Vulnerability Index (SVI) in identifying all factors influencing social vulnerability, citing discrepancies between the SVI and local perspectives of social vulnerability. Limitations include the SVI’s dependence on survey responses and its nature as a “single snapshot” of a community in time. FEMA should consider incorporating data from alternative sources into the NRI, such as Headwater Economics’ Rural Capacity Map, which identifies communities with limited capacity based on factors such as local government staffing, community education and engagement, and socioeconomic trends.³

The exclusion of pluvial flood risk in the NRI is an additional concern. NOAA is currently working to publish its updated Atlas 15 National Precipitation Frequency Atlas of the United States, which will provide precipitation frequency estimates that account for climate change for all U.S. states and territories. FEMA should consider incorporating improved pluvial flood risk information based upon currently available NOAA Atlas 14 data, and to coordinate with NOAA to update the model when Atlas 15 data becomes available.

² Coastal States Org., *CSO Member Feedback on FEMA Hazard Mitigation Experiences and Priorities* (Jul 15, 2019) (attached).

³ Headwater Economics, *A Rural Capacity Map* (Jun. 2023), available at <https://headwaterseconomics.org/equity/rural-capacity-map/>.

(2) Does your organization use the National Risk Index? How does your organization use the National Risk Index? What are the time horizons for decisions your organization is making using the National Risk Index (e.g., projects that will take place in 5, 20, 50+ years)? Are there specific features or aspects of the National Risk Index that you find particularly useful? Are there specific features or aspects that you would like to change? Does the addition of Expected Annual Loss Rate help in how your organization understands relative natural hazard risk? Would providing additional built in data filters (e.g., Hazard Mitigation Plan Status, National Flood Insurance Program participation, FEMA Disaster Declarations, Justice40 initiative investments, etc.) benefit the usability of National Risk Index data?

[See response to Question A(1).]

(3) Risk Assessment capability within FEMA traditionally uses nationally available data. Some tools (including but not limited to Hazus and the Resilience Analysis and Planning Tool) allow users to upload local information for decision support. How can FEMA work with State, local, Tribal, and Territorial partners to understand what more detailed information exists and how it can be incorporated into national level decision support tools? Should FEMA maintain products with baseline natural hazard risk data from consistently available national data sources and an enhanced product with additional local information? Are there specific features or aspects of the National Risk Index that you find particularly useful including features that could be added or altered?

FEMA should work with coastal programs to identify coastal data needs, and CSO encourages FEMA to maintain an enhanced product with additional local information where it is available. Ideally, local information would be directly incorporated into the primary NRI product. In addition, the ability to visualize data on a state-by-state basis (with coloring coded to state-level percentiles), would be a valuable addition. These changes, along with the incorporation of additional data filters listed above, would greatly improve the utility of the NRI as a tool for coastal stakeholders.

(4) Are there ways that FEMA could provide better outreach to communities and individuals with fewer resources to encourage use of its hazard assessment products? Are there partnerships that FEMA could explore to improve its outreach (and if so, with whom)? What other ways can FEMA and its partners present data and information to users to make data actionable? What other support could FEMA provide to help communities act on this information?

[Also responding to Questions E(3), E(4), F(1), F(3).]

Outreach and education are key to ensuring the NRI and CDRZ designations help support communities most in need of resilience-related activities. The federal government hosts an array of hazard data products, but there is currently a lack of clarity about the best uses of these different tools and how the NRI and CDRZs will fit into them. To encourage communities and individuals to make effective use of the NRI and the support associated with CDRZ designations, it is important that FEMA continue to provide effective outreach and education to staff at the state and local level about these tools and programs.

CSO recommends that FEMA partner with coastal programs to reach coastal end-users of the NRI and communities with CDRZs. Coastal program staff have lasting working relationships with local government officials and communities and are well-positioned to provide outreach and education around FEMA's hazard assessment products, including through coastal partnership networks such as Wisconsin's Coastal Hazards of Superior (CHAOS) Community of Practice and Washington's Coastal Hazard Resilience Network.

FEMA should expand support to states through the Community Assistance Program - State Support Services Element, Cooperating Technical Partnerships, RiskMAP, and other interagency opportunities like state-led Silver Jackets teams. Greater funding is needed for these existing mechanisms to meet the increased outreach and education needs for rolling out and successfully implementing the goals of the CDRZ program.

CSO regularly shares information about FEMA's programs and tools with coastal program staff across the U.S. through a Coastal Hazards Planning and Adaptation Work Group. CSO staff stand ready to engage with FEMA on sharing information with our members across the coastal states and territories.

CSO also recommends FEMA engage with other partners in the coastal management field to enhance outreach and education around FEMA's hazard assessment products:

- The National Estuarine Research Reserves (NERRs), which represent a network of 30 coastal sites designated to protect and study estuarine systems, provide trainings, outreach, and education to local communities, and can serve as a valuable partner for facilitating outreach around the NRI and other hazard assessment products.
- The National Sea Grant College Program, a national network of 34 university-based Sea Grant programs, sponsors scientific research, education, and public outreach.
- The National Estuary Program, an ecosystem-based network of organizations that protects and restores 28 estuaries across the U.S., conduct education and outreach with local communities.
- The NOAA Digital Coast, which provides coastal data, tools, and trainings to communities to address coastal issues.

FEMA should continue to prioritize outreach support to small, rural, or impoverished communities, which often have limited staff capacity of access to resources to support comprehensive planning or implementation efforts and are less likely to participate in technical assistance or funding initiatives.

B. Risk Assessment – Methodology

(1) The National Risk Index incorporates the Baseline Resilience Indicators for Communities as the Community Resilience component. Are there ways the National Risk Index could better represent resilient communities? If so, how? Recognizing that the Baseline Resilience Indicators for Communities does not currently include Territories, how can the Community Resilience component better measure Territories? What research exists to explain the validity or predictability of community resilience models?

[Also responding to Question E(3).]

U.S. island territories face myriad interdependent challenges in accessing federal resources, programs, and contacts. Island territories are not located close geographically to federal offices, which exacerbates barriers to accessing consistent, on-the-ground federal resources and support. Island jurisdictions have limited staff capacity to fully leverage all federal resources related to coastal resilience and hazard mitigation, making it difficult to maintain working relationships with external partners and to consistently submit competitive projects for grant programs. Island territories likewise have limited funding available to meet the nonfederal match requirements for hazard mitigation funding sources, underscoring the beneficial impact that a CDRZ designation could make for territorial communities.

FEMA should prioritize delivering additional support to territorial communities through CDRZ designations. Given the composite challenges faced by island territories, CSO recommends that FEMA designate each island territory in its entirety as a CDRZ. Designating territories as CDRZ would be in line with the approach taken by other federal agencies to include the territories in their entirety in definitions for disadvantaged communities eligible for additional support or match waivers, such as the U.S. Army Corps of Engineers⁴ and Department of Transportation,⁵ and in the Bipartisan Infrastructure Law.⁶ Additionally, there are analogous designations at an international scale: the United Nations considers U.S. island territories to be Small Island Developing States due to their unique vulnerability to the most severe impacts of climate change-related coastal hazards⁷.

E. Questions to Identify CDRZs

(1) In accordance with the legislation, FEMA will designate community disaster resilience zones at the census tract level. How can FEMA best communicate this designation once it has been made to the relevant jurisdictions and communities? What additional data and information would be useful to communities who are designated community disaster resilience zones? Would it be beneficial for FEMA to use a phased in approach or announce in stages, making adjustments to the selection methodology based on lessons learned, feedback and results? If so, what data and information should FEMA consider for a phased approach and how frequently should these designations be reviewed and how? How can FEMA best include climate change, land use change, and demographic changes in these designations?

[See response to Question A(3).]

To avoid delay, CSO recommends that FEMA consult with coastal programs and other partners early in the CDRZ designation process and to consider using a phased approach. Since CDRZ designation will be based on hazard risk ratings, it is important to ground-truth data to avoid shortcomings in the index methodology and avoid passing over communities in need. Incorporating locally informed data into an enhanced NRI product, as described in Response A(3), will help ensure CDRZ designations more accurately reflect vulnerability to natural hazards and deliver assistance to the communities who need it.

(2) In the absence of social vulnerability and community resilience data for the U.S. Territories, how should FEMA help Territories prioritize census tracts and resources based on the level of risk and vulnerability in each community, as well as the unique characteristics of each community, so that resources can be allocated more efficiently and effectively to support disaster resilience efforts?

[See response to Question B(1).]

⁴ Michael Connor, *Memorandum for Commanding General, U.S. Army Corps Of Engineers, Implementation Guidance for Section 160 of the Water Resources Development Act of 2020, Definition of Economically Disadvantaged Community* (Mar. 14, 2023), at 4(d), available at <https://usace.contentdm.oclc.org/utils/getfile/collection/p16021coll5/id/36002> (“An economically disadvantaged community is defined as [inter alia] U.S. Territories”).

⁵ See Dep’t Transp. *Areas of Persistent Poverty Project (APP) and Historically Disadvantaged Community (HDC) List* (Jan. 10, 2023), available at <https://datahub.transportation.gov/stories/s/tsyd-k6ij> (“For the purpose of the 2023 Notices of Funding Opportunity, and consistent with OMB’s Interim Guidance for the Justice40 Initiative, Historically Disadvantaged Communities include: [inter alia] any territory or possession of the United States.”)

⁶ P.L. 117-58 § 21202. (“The term ‘area of persistent poverty’ means [inter alia] any territory or possession of the United States.”)

⁷ United Nations Off. of the High Representative for the Least Developed Countries, Landlocked Developing Countries and Small Island Developing States, *List of SIDS*, available at <https://www.un.org/ohrlls/content/list-sids>.

(3) How should FEMA work with State, local, Tribal and Territorial Governments in designating zones? How can FEMA partner with States, Tribes and Territorial government in working with local governments with community disaster resilience zones? What can FEMA do to help ensure community disaster resilience zones are supported by State, local, Tribal, and Territorial resilience efforts?

[See response to Questions A(4).]

Are there specific considerations that should be taken into account when designating zones in Tribes and Territories?

[See response Question B(1).]

(4) In what ways could FEMA encourage collaboration across jurisdictional boundaries to support a community's ability to reduce hazard risk?

[See responses to Questions A(4).]

F. Resilience or Mitigation Project Planning Assistance

(2) How can FEMA support comprehensive community resilience planning to benefit community disaster resilience zones and the larger communities those census tracts lie within?

For coastal communities with CDRZ designations, CSO encourages FEMA to partner with coastal programs in providing support for community resilience planning and alignment of hazard mitigation and coastal resilience planning efforts. Coastal programs are well positioned to execute the comprehensive, long-term planning support needed to enable coastal communities to sustain momentum over the many years and many funding sources necessary to achieve community-wide hazard mitigation outcomes.

(3) How should FEMA engage with State, local, Tribal, Territorial, and nongovernmental levels to provide technical assistance to benefit communities within Community Disaster Resilience Zones?

[See responses to Questions A(4) and E(1).]

(4) What activities could FEMA undertake to help community disaster resilience zones understand and implement the types of projects, activities, or services that would minimize/reduce natural hazard risk?

For CDRZs that fall within the coastal zone, we recommend FEMA work with coastal programs to deliver outreach and informational products to support technical assistance, and to work with coastal programs to align hazard mitigation planning efforts within communities. Many coastal programs have also worked for years to collect data that better characterizes risk in coastal communities. FEMA should make sure to engage coastal programs early and often to ensure coastal communities with CDRZ designations are well-equipped to implement the types of projects, activities, and services that will reduce natural hazard risk.

G. CDRZ Project Application and Certification Process

(1) How can the identified community disaster resilience zones and FEMA's assistance amplify other Federal and non-Federal programs to direct resources to communities with high risk to natural hazards, high social vulnerability and low community resilience? What other programs would be complementary?

A recent analysis of BRIC and FMA applications suggests that, although BRIC and FMA prioritize directing funding towards communities with high social vulnerability, jurisdictions with low capacity are less likely to apply for and be awarded funding.⁸ With the currently unprecedented level of federal investment in building climate resilience, it is important that federal programs work to complement one another in order to best provide support to communities in need. NOAA is currently investing billions in climate resilience, with a significant portion of this investment going towards coastal communities. This funding will support capacity building, technical assistance, and implementation of resilience projects. For CDRZ that are designated in coastal communities, CSO encourages FEMA to coordinate with NOAA and coastal program staff in states and territories to align coastal resilience priorities.

⁸ Anna Weber, Nat. Res. Def. Council, *The BRIC Wall: Capacity Gaps Put FEMA Grants out of Reach* (Feb. 8, 2023), available at <https://www.nrdc.org/bio/anna-weber/bric-wall-capacity-gaps-put-fema-grants-out-reach>.