Summary of Request for Information on the Implementation of Community Disaster Resilience Zones

FEMA sought public input on the methodology and data used for the National Risk Index, as well as the Community Disaster Resilience Zones designation methodology, through public engagement sessions and Request for Information published in the Federal Register. In the 60-day public comment period from May 26 - July 25, 2023, FEMA received more than 600 comments through 24 public engagement sessions and submitted comments. FEMA reviewed and considered these comments as it determined a methodology for the initial designations.

Community Disaster Resilience Zones

The Community Disaster Resilience Zones Act of 2022, P.L. 117-255 (CDRZ Act) directed FEMA to (1) maintain a natural hazard assessment program and update products for the public's use that show the risk of natural hazards through the use of risk ratings; and (2) designate at the census tract level "Community Disaster Resilience Zones" (CDRZs) based on natural hazard risk ratings. The act directed FEMA to review the underlying methodology and receive public input on the natural hazard risk assessment product that it would use to designate zones.

Pursuant to that direction, FEMA considered the data used and reviewed the underlying methodology of the National Risk Index. The National Risk Index is an effective resource for a nationwide, holistic assessment of baseline risk to natural hazards and is relied upon when working with state, local, tribal and territorial partners to determine risk.

From this review and engagement FEMA is designating as Community Disaster Resilience Zones census tracts within communities that are at the most risk and most in need. On Sept. 1, 2023, FEMA published the initial set of 483 designated zones.

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Next Steps

The act requires FEMA to regularly review and update its risk assessment products and in the future FEMA will be designating additional zones. Based on public comments received to date, FEMA is actively accessing how to incorporate climate change data into five hazards within the National Risk Index. These include data for coastal flooding, drought, heatwave, hurricane wind, and wildfire.

FEMA is committed to making every effort to seek additional public input. We are connecting and engaging with experts and new stakeholder groups as they are identified to review and update the designation methodology for future zone designations.

Summary of Public Comments

FEMA categorized the comments received in virtual public engagements and through the Federal Register. The comments include six main themes:

- Community Engagement
- Data/National Risk Index
- Designation Methodology
- Displacement
- Equity
- Post-Designation Support

FEMA appreciates the agencies, organizations, and individuals who took the time to provide thoughtful and detailed feedback.

Designation Methodology

The following is a comment summary for the designation methodology theme. These comments were focused on five topics: **Topic 1:** National Risk Index; **Topic 2:** Designation Process; **Topic 3:** Use of Additional Data Sources; **Topic 4:** Use of Census Track Data; and **Topic 5:** Additional Methodology.

Topic 1: National Risk Index

There were many comments and concerns pertaining to the National Risk Index. These are some broad themes on this topic.

Commenters thought that the National Risk Index's consideration of hazard loss, vulnerability and resilience creates a strong framework for identifying areas of greatest need and prioritizing resilience investments.

Commenters thought that although the National Risk Index does a good job for national-scale planning and risk analysis, it should not be the sole data source for Community Disaster Resilience Zones designations.

Many commenters felt that the National Risk Index data does not capture the complex realities of resiliency and cannot give an accurate threat assessment.

Some commenters said the National Risk Index may not be a useful tool for considering high-risk events, and FEMA should work closely with state, local, tribal and territorial partners to help determine risk.

Others felt that if the National Risk Index is the sole tool used to identify disaster resilience zones, some states will not be able to fully access the program and it may prioritize large cities over rural areas.

Topic 2: Designation Process

To avoid relying solely on National Risk Index data and to create a better designation methodology, commenters offered a few recommendations.

National Risk Index data should consider a broader geographic distribution that involves input from the states and uses locally informed data to ensure a more balanced representation of risk across communities.

Additional data needs to be included when creating these zone designations including localized climate change projections for sea level rise, extreme temperatures, drought, flooding and wildfires.

Include comprehensive high-resolution flood inundation maps for modeling purposes and updated land use data.

Societal factors may also need to be considered when measuring a community's vulnerability rather than only the economic impacts.

Topic 3: Use of Additional Data Sources

The following sources for alternative use of data and tools were recommended.

For U.S. Territories, the Community Development Block Grant—Mitigation Action Plan contains an assessment for social vulnerability and hazard risk that would be helpful when designating these zones.

The Climate and Economic Justice Screening Tool was recommended for short term use to help identify areas across the nation where communities are faced with significant burdens.

To avoid duplicating efforts and to maximize impact, commenters recommended using pre-existing classifications from the Economically Disadvantaged and Rural Communities designation and aligning with the Justice40 Initiative.

Using a peer-review process and working with partners such as the National Academies was also recommended to ensure that the best methodologies are used.

Topic 4: Use of Census Tract Data

Many commenters were supportive of using census tract data. Commenters noted that using census block data to inform mapping and other decisions could be beneficial to these resilience zone designations.

Commenters want FEMA to keep in mind, however, that the census tract level may not be a good measure for hazards because low-risk areas can outweigh high-risk areas within the same block. A more distinctive measurement may be needed.

Topic 5: Additional Methodology

Commenters felt that creating a clear and simple methodology with an easy-to-use interface and ensuring that designations are communicated in a way that is

understood by all is important to minimize undue burdens on local communities.

FEMA needs to be transparent about its methodology and ensure that the program is developed in a way that benefits the communities that need it most.

Commenters also want FEMA to coordinate with state and local governments when designating resilience zones. A phased and conservatively scoped approach towards designation should be taken.

Commenters recommended that FEMA consider the first set of designations as a pilot effort to learn from and refine over time. The five-year maximum review period was also an area that commenters wanted FEMA to reconsider as there is likely to be significant data improvements to the National Risk Index over time.