Response to Community Disaster Resilience Zones and the National Risk Index Request for Information

FEMA sought public input on the methodology and data used for the National Risk Index, as well as the Community Disaster Resilience Zones (CDRZ) designation and implementation methodologies, through public engagement sessions and a Request for Information published in the Federal Register.

In the 60-day public comment period from May 26 - July 25, 2023, FEMA received responses from over 100 commenters, including federal, state, Tribal, territorial, and local government partners, private industry, non-governmental organizations, and the general public.

FEMA reviewed and considered these comments as it developed a methodology to designate the first round of CDRZs. Based on that methodology, FEMA announced the initial set of 483 designated zones on Sept. 6, 2023. The objective of designating CDRZs is to support the nation's most at-risk and in-need communities. FEMA will designate additional zones, further incorporating feedback from the Request for Information and lessons learned from the initial round of designations.

FEMA is committed to using public feedback to improve the National Risk Index, improve the methodological approach to designating zones, and inform implementation approaches for designated zones.

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 using risk ratings; and (2) designate, at the census tract level, "Community Disaster Resilience Zones" (CDRZs) based on natural hazard risk ratings, social vulnerability, and community resilience.

The Act directed FEMA to review the underlying methodology and consider public input on the natural hazard risk assessment product that it would use to designate zones. That product is the National Risk Index, which FEMA reviewed and updated, using feedback from the public and subject matter experts.

The National Risk Index is a resource for a nationwide, holistic assessment of baseline risk to natural hazards, social vulnerability, and community resilience. FEMA relies upon it when working with state, local, Tribal, and territorial partners to determine risk.

Next Steps

The Act also requires FEMA to regularly review and update its risk assessment products. In the future, FEMA will designate additional community disaster resilience zones incorporating updates from the National Risk Index. Based

on public comments received to date, FEMA is actively assessing how to incorporate climate change data into five of the hazards currently included in the National Risk Index. These include data for coastal flooding, drought, heatwave, hurricane wind, and wildfire.

FEMA is committed to continuing to obtain additional public feedback and subject matter expert input. Additionally, FEMA is connecting and engaging with experts and new stakeholder groups to review and update the designation methodology for future zone designations.

Summary of Public Comments and FEMA Responses

FEMA categorized the comments received in virtual public engagements and through the Federal Register into six main themes: 1) designation methodology, 2) post-designation support, 3) community engagement, 4) data and the National Risk Index, 5) equity, and 6) community displacement. FEMA thanks the agencies, organizations, and individuals who took the time to provide thoughtful and detailed feedback.

FEMA received many favorable comments regarding this effort. Some commenters appreciated the attempt to identify the most at-risk communities across the country and acknowledged the need to leverage resources for resilience efforts for these areas. Commenters also expressed approval for supporting often overlooked areas through this effort, as well as facilitating public-private connections. Additionally, several commenters expressed appreciation for the opportunity to comment on the Community Disaster Resilience Zones initiative and the National Risk Index.

As there were over 600 individual comments, this is a high-level summary, grouped by theme. FEMA encourages interested parties to review the posted public comments at regulations.gov.

Designation Methodology

The following is a summary of the designation methodology theme. These comments were focused on five topics: the National Risk Index, the designation process, use of additional data sources, use of census tract data, and additional methodology considerations.

Topic 1: National Risk Index

Commenters noted that the National Risk Index's consideration of hazard loss, vulnerability, and resilience creates a robust framework for identifying areas of greatest need and prioritizing resilience investments. Commenters suggested that although the National Risk Index works well for national-scale planning and risk analysis, it should not be the sole data source for Community Disaster Resilience Zones designations.

Some commenters suggested that National Risk Index data does not capture the complex realities of resilience and cannot give an accurate threat assessment, making it a poor tool for the goals and objectives of the initiative.

Some commenters said the National Risk Index was not a useful tool for considering high-risk events, and that FEMA should instead work closely with state, local, Tribal, and territorial partners to help measure risk. Others suggested 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 CDRZs benefits due to perceived limitations of the National Risk Index's data. Specifically, some commenters expressed concern that the platform may prioritize large cities over rural areas.

FEMA Response:

FEMA greatly appreciates the resources commenters shared. These will improve FEMA's ability to understand the long-term impacts of hazards beyond the hazards and impacts currently included in the National Risk Index.

FEMA understands that social vulnerability and community resilience are unique and distinct factors as they relate to how a community's risks are perceived and measured, and these factors require independent indices. FEMA will continue to invest resources into products, such as the National Risk Index, to ensure their utility, validity, and longevity. FEMA will leverage data and resources provided in response to the Request for Information, in addition to the existing products, to refine and build upon existing frameworks and models. FEMA also recognizes that county-level community resilience scores do not fully capture the specificity of individual and community resilience; FEMA is working to incorporate downscaled input as robust data and methods become available.

FEMA acknowledges that each hazard likely influences social vulnerability and community resilience differently. As the communities' understanding of these risk factors evolves, FEMA will be able to better tailor its strategy to unique circumstances.

In addition to the natural hazards considered in the National Risk Index, air quality, coastal erosion, fog, permafrost thaw, sinkhole susceptibility, wildfire smoke, and more have been recommended for inclusion in the tool. FEMA will continue to prioritize data and methodology development based on the availability of scientific, peer-reviewed research.

Each tracked hazard in the National Risk Index will be systematically updated, leveraging partnerships with other federal government agencies and other partners as additional data, information, and methods become available. FEMA continues to encourage interested parties to contact FEMA with additional methods to improve the methodologies and underlying data.

Topic 2: Designation Process

To avoid relying too heavily on National Risk Index data and thereby improve the designation methodology, commenters offered several recommendations, including:

- Updating the National Risk Index so it considers a broader geographic distribution that includes input from the states and uses locally informed data to ensure a more balanced and tailored representation of risk across communities.
- Ensuring that zone designations consider additional data, including localized climate change projections for sea level rise, extreme temperatures, drought, flooding, and wildfires.
- Including comprehensive, high-resolution data for modeling purposes.
- Leveraging updated land use data wherever possible.

- Considering societal factors in addition to economic impacts when measuring a community's vulnerability.

FEMA Response:

The CDRZs designation methodology is based on the National Risk Index and the White House Council on Environmental Quality Climate and Economic Justice Screening Tool. The National Risk Index, which measures risk, is based on three components: Expected Annual Loss, the Social Vulnerability Index,[1] and the Baseline Resilience Index for Communities.[2]

The Expected Annual Loss component is based on the monetary value of buildings (replacement cost), agriculture (crops and livestock), and fatalities and injuries. FEMA is required by the CDRZ Act of 2022 to consider these factors in zone designations, in addition to social vulnerability and community resilience, as noted below.

The Climate and Economic Justice Screening Tool identifies communities that are disadvantaged because they are overburdened and underserved. Using the Climate and Economic Justice Screening Tool in the designation methodology helps ensure that the benefits of the Act are targeted to the most in need communities.

The Climate and Economic Justice Screening Tool includes multiple categories of burden, including climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. FEMA's use of this tool will help to further focus attention on the nation's most disadvantaged communities. Please visit the White House Council on Environmental Quality webpage for more information about the Climate and Economic Justice Screening Tool.

Topic 3: Use of Additional Data Sources

Commenters suggested using additional data and tools:

- For U.S. Territories, the Community Development Block Grant—Mitigation Action Plan contains an assessment for social vulnerability and hazard risk.
- The Climate and Economic Justice Screening Tool was recommended to help identify areas across the nation where communities face significant burdens.

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[1] The CDRZs designation methodology uses a tailored version of CDC's Social Vulnerability Index in the National Risk Index that includes the Socioeconomic Status, Household Characteristics, and House Type & Transportation Themes.

[2] The Baseline Resilience Indicators for Communities (BRIC) describes the differences in community resilience among counties within the state and within the nation through a comparative community resilience score. BRIC is comprised of six broad categories of community disaster resilience. Used as an initial baseline for monitoring existing attributes of resilience to natural hazards, BRIC can be used to compare places to one another, to determine the specific drivers of resilience for counties, and to monitor improvements in resilience over time.

- To avoid duplicating efforts and to maximize impact, commenters recommended using pre-existing classifications from the Economically Disadvantaged and Rural Communities designation and the Justice40 Initiative.
- To ensure that the best methodologies are used in selecting zones, commenters recommended working with partners, such as the National Academies, and using a robust peer-review process.

FEMA Response:

FEMA will continue to review State, Territory, and Tribal Hazard Mitigation Plans, Threat and Hazard Identification and Risk Assessments, and Community Development Block Grant – Mitigation Action Plans to understand what additional data sources are available to support the National Risk Index and inform future CDRZs designations. FEMA will consider these sources to expand Expected Annual Loss estimates to include other environmental and ecological impacts of natural hazards. FEMA recognizes the National Risk Index does not currently account for cascading hazards.

FEMA will leverage the Climate and Economic Justice Screening Tool as a key data source in the designation methodology, emphasizing the CDRZ commitment to help the most at-risk and most in need communities across the country. Please see Topic 2 above for more information on how the CDRZ initiative has leveraged the Climate and Economic Justice Screening Tool.

Additionally, FEMA is establishing a Technical Review Panel composed of federal government subject matter experts and program area leads to improve the National Risk Index and the CDRZ designation methodology and ensure that FEMA continues to use the best available data, tools, information, and methods to assess risk. FEMA will release additional information as the effort matures.

Topic 4: Use of Census Tract Data

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

Commenters urge FEMA to keep in mind, however, that data at the census tract level may not be a good measure for hazards because a tract with many low-risk areas can outweigh a few high-risk areas. Many commenters suggested that a more granular measurement may be needed, focusing on data collected at the state, county, city and/or community level by organizations or groups that operate within those communities.

FEMA Response: The CDRZ Act requires designating CDRZ at the census tract level. FEMA, in conjunction with subject matter experts, working groups, partner agencies (including the United States Census Bureau), and external stakeholders, will continue to evaluate and improve the methodological approaches for designating zones while remaining in compliance with the legislation.

To expand opportunities for Tribal Nations to leverage the benefits of the CDRZ initiative, FEMA intends to announce additional zones, using Tribal census tracts where applicable.

Topic 5: Additional Methodology Considerations

To minimize undue burdens on local communities, commenters suggested that it is critical to create a clear and simple methodology with an easy-to-use interface and communicate the designations in a way that is understood by all.

Commenters added that FEMA should be transparent about its methodology and ensure that the effort develops in a way that benefits the communities that need it most.

Commenters also suggested that FEMA coordinate with state and local governments when designating resilience zones. Additionally, commenters indicated that FEMA should take a phased and conservatively scoped approach towards designation.

Commenters recommended that FEMA consider the first set of designations as a pilot effort to learn from and refine the methodology over time. They also suggest that FEMA reconsider the requirement that community disaster resilience zone designations remain in effect for a period of not less than 5 years, as there is likely to be significant data improvements to the National Risk Index within that period.

Commenters also discussed using the Resilience Analysis and Planning Tool (RAPT) in the designation methodology. Commenters suggested that this tool could be easily translated into risk percentile ratings at the census tract level, allowing for more granular measurements, which could be used to help supplement data used in the National Risk Index.

FEMA Response: FEMA is determined to make the designation methodology as clear and straightforward as possible. In designating the CDRZs, FEMA leveraged a two-part designation approach, using both the National Risk Index and the Climate and Economic Justice Screening Tool, the latter a requirement of Executive Order 14008, M-23-09, Addendum to the Interim Implementation Guidance for the Justice40 Initiative, and M-21-28, on using the Climate and Economic Justice Screening Tool.

For the initial round of designations, FEMA selected the census tracts with National Risk Index scores that rank in the top 50 nationally or in the top 1% in each state. After selecting census tracts according to risk, FEMA then used the Climate and Economic Justice Screening Tool, developed by the White House Council on Environmental Quality, to remove any census tract that was not considered disadvantaged by the tool. In other words, every census tract designated as a CDRZ is classified as disadvantaged by the Climate and Economic Justice Screening Tool. At the time of the Sept. 6, 2023, zone designations, Climate and Economic Justice Screening Tool data were only available for 2010 census tracts and had to be cross-walked to National Risk Index 2020 census tracts.[3] Any 2020 census tract with land overlap (greater than zero percent) with a 2010 Climate and Economic Justice Screening Tool disadvantaged census tract was considered disadvantaged in designating CDRZ on Sept. 6, 2023.

[3] The methods for CDRZ Zone Designations are documented here: https://experience.arcgis.com/experience/3fdfd0639ba0403e9414d05654449d32/page/Designation-Methodology/.

The designation methodology underwent peer review by subject matter experts in a Methodology Data Working Group with support from the Mitigation Framework Leadership Group. The Mitigation Framework Leadership Group provides a coordinating structure for mitigation across the federal government and with partners in mitigation nationally. The group includes members from across the federal space, as well from state, local, Tribal, and territorial partners. It operates according to the National Mitigation Framework with the objective to strengthen the nation's disaster resilience by expanding mitigation awareness, coordination, and action.

FEMA has engaged both public and private stakeholders on this topic, is actively engaging with key stakeholders, and is planning additional outreach. FEMA held an informational webinar in November 2023, where FEMA explained the background, scope, mission, vision, and future of the CDRZ effort. FEMA encourages interested parties to view the webinar here. The CDRZ webpage also contains a map with CDRZ designations, identified at the census tract level.

FEMA is consistently evaluating the designation methodology and is incorporating lessons learned from the initial round of designations. FEMA understands that it is likely that there will be significant data improvements to the National Risk Index within the five year period mentioned by a commenter; however, according to the CDRZ Act, designations "shall be effective for a period of not less than 5 years." FEMA's methodological approaches and data sets are subject to continuous review, and FEMA's teams will evaluate updates to the underlying data as needed to improve the designations.

FEMA's National Risk Index provides all data and information at the county and census tracts levels and the risk score is a percentile representation of the risk values. FEMA's Resilience Analysis and Planning Tool (RAPT) may be useful for jurisdictions to explore the data used in the CDRZ designation methodology with additional census data, infrastructure data, and hazard data using RAPT's built-in geographic information system analysis tools. Subject matter experts continue to evaluate both the National Risk Index and the Climate and Economic Justice Screening Tool and, as always, FEMA welcomes continued collaboration and input from interested stakeholders.

Post-Designation Support

Comments in the post-designation support theme were focused on three topics: Community Disaster Resilience Zones and state and local partners, resilience and mitigation, and funding considerations.

Topic 1: Community Disaster Resilience Zones and State and Local Partners

Commenters expressed concerns about how to manage the CDRZ initiative in their local communities. Many were concerned that CDRZ could crowd out other projects, overlook similarly disadvantaged areas, and create legal and economic challenges.

Commenters offered a few recommendations to address these concerns. For instance, FEMA could consider some level of capacity building for local governments by leveraging existing programs, collaborating with local organizations, and involving communities in the decision-making process. Commenters also suggested that FEMA should help smaller localities access their benefits, including with navigating grant availability.

Commenters further suggested that FEMA require the use of Department of Housing and Urban Development approved housing counselors to assist any resident or household navigating the grants process that has been displaced by a resilience or mitigation project. For more on community displacement, see the final section of this response.

Commenters recommended taking a regional risk approach – meaning considering input from on-the-ground partners – to paint a holistic picture of how hazards will impact neighboring communities, not just those in the CDRZ.

Commenters urged FEMA to take a holistic and collaborative approach to state and local involvement in and with CDRZs in any major decisions regarding resilience projects. Commenters recommend that FEMA ensure that communities are actively involved, well-informed, and receive tailored support as designated CDRZs.

Many commenters stressed the importance of collaboration among all stakeholders including local, Tribal, state, and non-governmental entities. Commenters highlighted that FEMA should work closely with local governments to offer the appropriate level of support for each community.

Additionally, commenters recommended that FEMA be transparent when working with communities and to share lessons learned publicly so that other communities with similar challenges can learn from the initiative. To address potential concerns, commenters recommend ensuring that local leaders fully understand the initiative before CDRZs are designated.

FEMA Response: A comprehensive, transparent, and inclusive approach is at the core of this initiative's outreach and engagement strategy. FEMA is actively engaging with potential partners at the state and local level and across the public and private sectors. Additionally, FEMA held three listening sessions and a Tribal Consultation prior to the initial designations on Sept. 6, 2023, and two informational webinars in the months following the designations. A recording and transcript may be found on the CDRZ webpage. Any future designations will be updated on the CDRZs portal, and through releases by FEMA's regions to ensure that designated zones are notified.

The support provided under this initiative is designed to improve whole of community resilience and mitigation efforts, complementing, and amplifying rather than crowding out existing projects. FEMA also recognizes that designated communities and localities best know their needs on the ground, which is why FEMA is actively encouraging the participation of local stakeholders as partners for this initiative.

The designation methodology, leveraging the National Risk Index, looks at risks facing individual census tracts; however, these risks often affect areas outside of the designated zones. While the National Risk Index strives for a holistic risk picture, FEMA will also continue to engage partners in states, localities, territories, and Tribal Nations throughout the selection, designation, and implementation of these designated zones, as well as in identifying data to improve the National Risk Index.

Topic 2: Resilience and Mitigation

Many commenters focused on a few overarching themes related to resilience and mitigation. These included comprehensive resilience planning, incentivizing homeowners to strengthen infrastructure, and using nature-based solutions.

For comprehensive resilience planning, commenters recommended that FEMA focus on structural resilience, permit funding for mitigation planning projects, and expand efforts beyond public infrastructure to include commercial, industrial, and multifamily buildings, as well as community resilience centers.

Commenters expressed desire that FEMA incentivize homeowners to take resilient actions. Multiple respondents commented on the importance of ensuring the adoption and enforcement of resilience-based codes, standards, and regulations to improve infrastructure. Commenters recommended using the Insurance Institute for Building and Home Safety as a source for technical expertise and data to show the importance of building structural resilience and promoting safety standards in construction.

Lastly, to support a community's ability to reduce hazard risk, some commenters suggested that FEMA should prioritize multi-benefit natural infrastructure and nature-based projects within designated zones. The wide variety of nature-based approaches benefit people and wildlife alike. Using natural systems provides adaptable and protective benefits for communities from a wide range of catastrophic events, like flooding, storm surge, wildfires, and extreme heat.

FEMA Response:

FEMA is authorized to provide additional assistance for mitigation projects that reduce natural hazard risk in, or primarily benefiting, designated zones. FEMA is engaging with federal agencies, state and local governments, Tribal Nations, territorial stakeholders, philanthropic organizations, and the private sector to support these communities in developing resilience. FEMA will leverage support through existing technical assistance initiatives and direct financial assistance to develop and implement mitigation and resilience projects that reduce future damages, losses, and suffering.

Additionally, several Notice of Funding Opportunities addressing community resilience have mentioned CDRZ. Examples include: the Environmental Protection Agency's Environmental and Climate Justice Community Change Grants Program, the Department of Housing and Urban Development's Fiscal Years 2023 and 2024 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition, and the Department of Homeland Security's Fiscal Year 2024 Homeland Security National Training Program Continuing Training Grants, among others. The most current list can be found at grants.gov.

FEMA recognizes the importance of resilient infrastructure not just in the public sector but also in commercial, industrial, and residential areas. A key example of this is FEMA's Building Codes Strategy, which uses a data-driven approach to help coordinate and prioritize agency activities and advance the adaptation and enforcement of hazard-resistant building codes and standards.

Incentivizing Homeowners

To enhance structural resilience, FEMA continues to support the enforcement of robust building codes and standards in collaboration with entities like the International Code Council (ICC) and the Insurance Institute for Building and Home Safety (IBHS). These partnerships help provide the technical expertise necessary to uplift building practices nationwide, making communities safer and more resilient.

Nature-Based Solutions

Nature-based solutions are pivotal in our strategy for reducing hazard risks. These solutions not only generate ecological and biodiversity benefits but also provide flexible, cost-effective means of protection against disasters such as floods, wildfires, and extreme weather events. FEMA is committed to integrating nature-based solutions into our resilience planning, particularly within designated zones, to harness these benefits fully.

FEMA encourages interested parties to see the "Community Disaster Resilience Zones Benefits" section below to learn more about the benefits of a designation.

Topic 3: Funding Considerations and Collaboration Efforts

Many commenters provided suggestions about how resources under this initiative could be leveraged to best support the initiative's resilience mission. Major themes identified by commenters included the following:

- FEMA should coordinate funding efforts with state and local organizations, as well as locally based non-profits and non-governmental organizations. Some commenters indicated that these groups would have the best understanding of "on the ground" funding needs within the zones and expressed concern that FEMA might overlook state and local level groups.
- The CDRZ initiative and the benefits of designation should act as a vehicle for directing resources to green infrastructure and resilience projects in designated zones.
- Technical assistance programs should be a major element of a "toolkit" offered to designated zones.
- Small communities or first-time recipients may not have the knowledge necessary to navigate the Building Resilient Infrastructure and Communities program and other grants processes. The initiative should make resources available to these zones accordingly.

Many commenters provided suggestions about the nature and scope of partnership efforts under the CDRZ initiative, as well as FEMA's role therein. Major themes included:

- FEMA should leverage a "navigator" framework to assist designated zones in identifying support mechanisms.
- FEMA should leverage existing programs and resources from other federal agencies, such as resources offered by the National Oceanic and Atmospheric Administration, U.S. Department of Transportation, and the Environmental Protection Agency.

FEMA Response: Creating opportunities for locally focused organizations is a critical part of FEMA's outreach and CDRZ implementation strategy. FEMA has and will continue to work with state and local organizations, leveraging outreach teams and regional liaisons to help such groups understand the benefits of these designated zones.

To help those communities reach their resilience goals, FEMA is working to support grant applications benefitting CDRZ through Building Resilient Infrastructure and Communities Direct Technical Assistance. Additionally, the CDRZ effort has received commitments of support from several interagency partners to use CDRZ in their programs. Major federal partners include National Oceanic and Atmospheric Administration, U.S. Department of Transportation, the Environmental Protection Agency, and the Department of Housing and Urban Development. FEMA is also actively

engaged in outreach efforts with numerous private sector, non-profit, and non-governmental organizations, including Wal-Mart, the Association of State Floodplain Managers, the Urban Institute, the Geos Institute, and SBP among many others.

FEMA also recognizes that there is no "one size fits all" approach to address the resilience needs of designated zones and that the nature of resilience will vary widely from community to community. FEMA has also prioritized access to technical assistance as one of the key benefits of a CDRZ designation, recognizing that this will be the first time many communities are navigating the process of requesting and using technical assistance from FEMA.

Community Engagement

Comments regarding community engagements were focused on five topics: private sector and nongovernmental organization (NGO) relationships, implementation strategies, state, and local government relationships, Community Disaster Resilience Zone benefits, and designation data and National Risk Index.

Topic 1: Private Sector and Nongovernmental Organization Relationships

Many commenters noted that FEMA should engage directly with residents of the designated communities, adding that these groups best know the needs of their zones. Moreover, commenters recommended that CDRZ engagement should be coordinated with both public and private sector local organizations. There was a desire for increased communication through such organizations to broadcast and amplify the CDRZ effort. Respondents further recommended that CDRZ engage with local subject matter experts, including engineers, architects, building contractors, and university faculty.

FEMA Response: Local engagement is critical to the success of CDRZ. FEMA has engaged with numerous local stakeholders, including state and county officials, resilience experts, hazard mitigation groups, architects, emergency planners, building scientists, and wildlife policy specialists, among others, at various forums. FEMA—both at the headquarters level and through FEMA's regions—will continue engaging with such groups, including state, local, Tribal, and territorial partners to better understand local concerns and needs and to better serve local stakeholders.

Furthermore, FEMA regional staff are available to help coordinate CDRZ efforts and meet with stakeholders to help leverage the benefits of the effort. FEMA has designated liaisons in each FEMA region to assist with requested speaking engagements, answer questions, and to generally serve as a point of contact for CDRZ-related matters.

Topic 2: Implementation Strategies

To ensure effective communication with the designated zones as well as to maximize buy in from other key regional stakeholders, commenters recommended that FEMA implement a transparent implementation strategy. Commenters expressed that implementation strategies should carefully consider rural and disadvantaged zones, as such areas may not have experience in navigating FEMA grants processes.

Multiple commenters recommended a phased approach to implementing CDRZ. They also recommended committing to tangible measurements of success during and after the roll-out. Commenters were interested to know

what success looks like for CDRZ and that such measurements were communicated with the designated communities.

FEMA Response: Transparency is a top priority for the CDRZ effort. To ensure that FEMA is transparent in its implementation strategy, FEMA has and will continue to engage with both public and private stakeholders. FEMA expects the frequency of engagements to increase as the effort progresses. FEMA held an informational webinar in November 2023 in which FEMA explained the background, scope, mission, vision, and future of the CDRZ effort. FEMA encourages all interested parties to view the webinar here. The CDRZ webpage also includes a map with designated CDRZ, identified by census tract, so that the general public can see which census tracts have been designated.

FEMA understands the importance of defining and measuring success for the initiative. Measures of success for CDRZ will be derived from the Resilience Results Framework currently in development by FEMA. This framework maps out the conditions FEMA needs to improve with associated outcomes and indicators in all communities, including CDRZ. Some outcomes represented in the framework apply particularly to CDRZ communities, e.g., outcomes related equity and reducing vulnerability.

FEMA is sensitive to the concerns about rural zone designations. The legislation behind CDRZ requires FEMA to consider geographical balance, and indeed FEMA's data shows that designated zones are approximately three times more likely to represent small and rural communities than non-CDRZ, according to the U.S. Department of Agriculture, Economic Research Service's Urban/Rural classification dataset.[4] FEMA recognizes that not all communities may be familiar with the grants process; therefore increased access to technical assistance is a key benefit for designated communities.

Topic 3: State and Local Governments

Commenters shared ideas about how to best work with state and local governments to implement the CDRZ initiative. A common theme from commenters was the importance of collaboration. FEMA should collaborate and coordinate with state and local government throughout the designation process and implementation activities. Working closely with state, local, Tribal, and territorial governments would help increase the accuracy of FEMA's risk data. Commenters also recommend that FEMA communicate with local governments that have CDRZs in their jurisdiction prior to any public announcement so that local leaders are prepared.

Commenters suggested that FEMA partner with agencies across the federal government to create a navigator network including all states and territories. Navigator networks would work with CDRZs to help them build resilience and identify barriers to taking effective action. They would then help these communities connect to the resources they need.

FEMA Response: FEMA understands the importance of collaboration with state and local partners. This is why FEMA has identified regional liaisons to coordinate with state and local stakeholders to:

[4] U.S. Department of Agriculture, https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural/.

- Understand local concerns and needs.
- Help ensure that designated localities understand the benefits and resources available to them.
- Act as liaisons to regional stakeholders and organizations who wish to partner with designated CDRZ.

FEMA is continuing outreach with public and private stakeholders and is always interested in engaging local and regional partners as navigators for local communities. FEMA encourages interested parties to contact their regional representative for additional information.

Topic 4: Community Disaster Resilience Zones Benefits

Commenters shared their views about how to expand the benefits that these designations can offer their communities. The comments focused on education, assistance, partnerships, and collaboration.

Providing expanded education and assistance to state and local communities is one way that commenters recommended expanding the benefits offered by designated zones. Additionally, commenters suggested that awareness programs could address knowledge gaps surrounding funding sources as well as assisting communities to better understand other benefits under the legislation. Commenters also highlighted that sharing lessons learned from the CDRZs initiative would be beneficial to communities.

Comments also stressed the importance of developing partnerships and collaboration. FEMA should encourage projects that benefit multiple communities and promote collaboration beyond jurisdictional boundaries. FEMA should also leverage partnerships and technical assistance programs to support CDRZs efforts.

FEMA Response: Clear communication of benefits to designated areas is a top priority for FEMA. Communities enjoy several benefits as a result of a designation, including:

- **Fiscal Year 2023 Building Resilient Infrastructure and Communities (BRIC) Grant Program**
  - Cost Share: A CDRZ designation increases the federal cost share eligibility to 90 percent for BRIC-funded mitigation projects within, or that primarily benefit, a CDRZ. The goal is to reduce the financial burden on the most at risk and most in need communities pursuing resilience-related activities. This increased cost share is outlined in Fiscal Year 2023 Building Resilient Infrastructure and Communities Notice of Funding Opportunity, published on Oct. 12, 2023.
  - Technical Assistance: Communities with designated census tracts, if interested, are eligible to receive prioritized BRIC Direct Technical Assistance, which provides tailored support to communities that may not have the resources needed to begin climate resilience planning or to develop project solutions.
  - Scoring: For Fiscal Year 2023, subapplications with BRIC projects located in or that primarily benefit a CDRZ are eligible to receive additional points as part of the national competition. This provides even more opportunities for support within a zone.
- **Fiscal Year 2023 Flood Mitigation Assistance (FMA) - Grant Program**

- Like BRIC, Flood Mitigation Assistance applications for projects within or that primarily benefit a CDRZ will receive additional points.
- Applicants are eligible for prioritized benefit-cost analysis technical assistance.

- **Partner Support**
  - These designated zones can be a vital tool to help prioritize and focus resilience and mitigation efforts not only with FEMA, but also for other federal agencies, the private sector, philanthropies, and other nongovernmental organizations. FEMA is actively engaging with these partners to leverage their programs in support of this initiative.
  - FEMA has received support from interagency partners such as the Environmental Protection Agency, Department of Housing and Urban Development, and the Small Business Administration – among others – to work to incorporate CDRZs into some of their existing programs.
  - In addition, several Notice of Funding Opportunities have mentioned CDRZ in at least some capacity. Examples include: the Environmental Protection Agency's Environmental and Climate Justice Community Change Grants Program, the Department of Housing and Urban Development's Fiscal Years 2023 and 2024 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition, and the Department of Homeland Security's Fiscal Year 2024 Homeland Security National Training Program Continuing Training Grants, among others. The most current list can be found at grants.gov.

FEMA is committed to evaluating the effectiveness of this effort and will focus on evaluating and assessing the success of the program as the initiative matures. FEMA intends for this initiative to meet the high standards the Agency has set, and the evaluation methodology will be data-driven and focused on the impact this program is having for the communities who most need the support.

Topic 5: Community Engagement and Data

Commenters recommended ways to use and improve the National Risk Index and data for CDRZs.

To ensure that the initiative is using the best and most accurate data, FEMA should work with local organizations and agencies to identify drivers of risk in their communities. Commenters recommended that data derived from local collaboration needs to be used rather than data perceived as being gathered without community involvement or input.

Lastly, commenters stated that if cascading network failures is part of the National Risk Index—meaning the failure of integrated mitigation strategies/systems—the National Risk Index will show larger regional hazard risks and encourage cross-community cooperation. If cascading failure risk is incorporated into the National Risk Index and practicable tools are made accessible, communities will find it useful to work together to measure and to mitigate this aspect of risk.

FEMA Response:

FEMA greatly appreciates the concern regarding multiple data sources and agrees that any tool being used for designation selection should incorporate as many voices as possible, including state, local, Tribal, and territorial stakeholders. The National Risk Index includes inputs from 91 different entities, including federal, state, county and local partners, the private sector, nongovernmental organizations, and academia. Loss data from historic hazard events is obtained from Arizona State University (ASU) Center for Emergency Management and Homeland Security's SHELDUS™ database. SHELDUS™, in turn, leverages data from NOAA's Storm Events Database and the NOAA Storm Data Publications. FEMA also encourages interested parties to view the National Risk Index's technical documentation for additional information on the tool and its sources.

FEMA received substantial feedback on the designation process, and as FEMA works to build out the future designations framework, state, territorial, and Tribal Nation specific data should be considered, if applicable. FEMA continues to work on building and evaluating multiple testing methodologies for this initiative. The goal remains to allow for a transparent, data-driven, and data-informed process in which all stakeholders can provide feedback. FEMA is exploring all options available on the designation methodology within the bounds of the CDRZs Act.

The National Risk Index communicates the primary expected annual losses for a given natural hazard. Cascading hazard impacts, including indirect economic losses, long term business disruption, and other less direct economic losses are not fully incorporated in the natural hazard risk assessment tool. These are very difficult to measure or estimate in a robust and consistent manner and more research is needed before being added to the National Risk Index or the zone designation methodology.

FEMA always encourages stakeholders to provide additional information and suggestions to help refine and improve our designation tools. Please email FEMA at FEMA-NRI@fema.dhs.gov for questions, comments, and feedback on the National Risk Index.

FEMA also encourages interested parties to see the responses in the Data and National Risk Index section below for additional information.

Data and National Risk Index

Comments addressing data and the National Risk Index were focused on six topics: tsunami data, a climate-informed National Risk Index, riverine flood, territories and Tribal Nations, Expected Annual Loss, and historic flood ratio.

Topic 1: Tsunami Data

Commenters were concerned about the National Risk Index's tsunami data and suggested that the National Risk Index misrepresents tsunami hazards in coastal areas of the states, the District of Columbia, and the territories. Commenters urged FEMA to reexamine existing methodologies and to understand the importance of all types of tsunamis, regardless of source.

FEMA's response: The National Risk Index team is working with state and federal partners through the National Tsunami Hazard Mitigation Program (NTHMP) to build a cohesive and comprehensive tsunami hazard methodology, leveraging additional layer updates along with state-level data to integrate into the National Risk Index. FEMA is

committed to producing and co-developing the methodology with NTHMP and aims to receive continual NTHMP feedback throughout the process.

FEMA is making the following updates to address key concerns with tsunami hazards:

- Building Loss: NTHMP and FEMA are working to identify a set of tsunami inundation, velocity, and momentum flux products. Leveraging this tsunami data, FEMA will use Hazus and the United States Army Corps of Engineers National Structure Inventory to estimate building losses.

- Fatalities and Injuries: The United States Geological Survey (USGS) is developing a count of people who are unable to reach tsunami safe areas before the arrival of a tsunami and sharing those with FEMA at the census block level. Loss rates will be applied based on the remaining population and tsunami run-up depth values. Exposure estimates are being updated based upon USGS and NTHMP expertise.

- Frequency: All frequency data are being developed in coordination with NTHMP to standardize state hazard data across state lines.

- Other harbor and overwater facilities, including liveaboards: These facilities and infrastructure are not included in building loss estimates due to a gap in data availability. Data for all coastal harbors and port facilities are not nationally available, loss and damage functions are not available, and at this time, any broad assumptions would be too subjective and therefore cannot be applied equitably across the United States. FEMA is committed to working with NTHMP to estimate the annualized impact of these facilities from tsunamis.

Topic 2: Climate-Informed National Risk Index

Many commenters stated that the National Risk Index should consider climate change. Commenters shared that climate change increases the threat of extreme weather as a natural hazard and should be considered when evaluating hazard frequency, exposure, and severity.

Commenters noted that climate data could be better integrated into resilience planning. They recommend that FEMA create a single, consolidated climate data portal for communities and to partner with agencies like NOAA.

FEMA's response: FEMA is actively pursuing data and methods to create a climate-informed National Risk Index. Data sources include those provided by Climate Mapping for Resilience and Adaptation, the Climate Risk and Resilience Portal, and other publicly available products. Additionally, FEMA is actively consulting with federal agency partners on additional climate-informed data sources and anticipates a potential release in late 2024.

The first steps in developing a climate-informed product are using a multiplicative factor to represent the hazard changes in each location. Results will initially be available for two trajectories, Representative Concentration Pathway (RCP) 4.5 and RCP 8.5, and for two time points, mid-century and late century. By using multiple data sources, FEMA is aiming to provide users with a suite of data to inform their future natural hazard risk for coastal flooding, drought, extreme heat, hurricane wind, and wildfire. Further research and data are needed for FEMA to create a complete future condition exposure data set.

Topic 3: Riverine Flood

Commenters suggested that the National Risk Index does not accurately capture inland flood risk. Commenters recommended using the National Flood Hazard Layer assessment for additional data. They also recommend that FEMA update the riverine flood hazard model in the National Risk Index to include storm water, urban, and other flood types.

FEMA's Response: Revising the riverine flood hazard within the National Risk Index is a very high priority for FEMA and the input received further reinforces this need. FEMA is comprehensively overhauling the National Risk Index riverine flood hazard to better capture the nation's inland flood risk and this includes changing the name of the hazard category to "inland flood" to reflect these hazards more accurately. The National Flood Hazard Layer reflects flood data that is designed to meet the needs of the National Flood Insurance Program (NFIP) and remains the only comprehensive, publicly available flood hazard assessment. However, it currently does not include flood hazards beyond traditional fluvial flood hazard estimates, thereby not reflecting a comprehensive flood hazard picture for the nation. The National Risk Index team is exploring all options for updating the inland flood hazard model. The team has developed multiple alternatives centered around methods used by the NFIP for assessing inland flood risk to individual structures insured by this program.

The NFIP presents opportunities for enhancing the inland flood component as it uses a comprehensive methodology to set flood insurance rates that are actuarially sound. This involves considering various flood risk variables, including flood frequency, type of flood, proximity to a water source, and property characteristics like elevation and rebuilding cost. The NFIP also incorporates FEMA's historical data on exposures and losses. This iterative process ensures that the rates are not only based on predictive models but also reflect historical data, enhancing accuracy. These data can be used to refine flood risk data beyond what is available from the National Flood Hazard Layer alone.

Topic 4: U.S. Territories and Tribal Nations

Commenters were concerned about using National Risk Index data when designating CDRZs in U.S. territories and for Tribal Nations. Commenters shared that there is limited National Risk Index data for U.S. territories and incomplete data for Tribal Nations.

FEMA's response: FEMA will work to build and implement a data strategy with partners to ensure that robust risk assessment information, data, and methods are available for the territories. In coordination with Tribal Nations, FEMA will develop and implement a strategy for engaging Tribal partners and subject matter experts to improve data quality and develop new data sources for Tribal Nation lands.

Because of risk data limitations for Tribal Nations and territories, FEMA is taking a co-designation approach to the first set of designations for Tribal Nations and territories, inviting them to adjust their designations based on local or Indigenous knowledge and self-certified data.

For Tribal Nations, FEMA will identify 20 percent of census tracts from each Tribal Nation's lands by highest risk, using National Risk Index Expected Annual Loss (EAL) rate. For Tribal Nations without land, FEMA will identify the census tract where the Tribal Nation government's headquarters are located. FEMA will then work with their regions

and Tribal Nations to add or remove census tracts based on Indigenous knowledge and/or self-certified data, with a cap at 20 percent of the Tribal Nation's total number of census tracts.

Among census tracts identified as disadvantaged by the White House Council on Environmental Quality's Climate and Economic Justice Screening Tool, FEMA will use each territory's risk scores, derived from the National Risk Index, to identify the territory's highest risk census tracts equal to 20 percent of the territory's total tracts. FEMA will then work with territories, through FEMA's regional offices, to select half of the identified census tracts, resulting in CDRZ designations for 10 percent of the census tracts in each territory.

Topic 5: Expected Annual Loss (EAL)

Commenters suggested that FEMA should work with other partners to improve EAL estimates to include other environmental and ecological impacts of natural hazards and to ensure that risk is not overestimated.

FEMA's Response: The National Risk Index presents a baseline of natural hazard risk across the United States. Since the National Risk Index uses loss information from the Spatial Hazard Events and Losses Database (SHELDUS) to derive the historic loss ratio component, it provides a lower end estimate of risk. SHELDUS™ is built from NOAA's National Centers for Environmental Information Storm Events Database and Storm Data publications. As not all loss-causing events are reported, it most likely represents a lower-end loss estimate. SHELDUS™ only provides loss information for buildings, agriculture, and people.

FEMA will coordinate with the U.S. Department of Agriculture to further refine and expand the EAL calculation methodology to ensure that insurance data are accounted for appropriately, and that risk is not overestimated. FEMA, with support from partners, will consider expanding EAL estimates to include other environmental and ecological impacts of natural hazards. FEMA is working to ensure users have access to both the annualized loss values and expected annualized loss rates as both are critical for understanding natural hazard risk. Additionally, the National Risk Index only accounts for primary impacts of natural hazards and does not consider derivative or cascading impacts.

Topic 6: Building Codes and Historic Loss Ratio

Commenters were concerned about using inadequate data sources when estimating historic loss ratios. Commenters suggested that hazard-resistant building code and adoption status are not adequately represented in the National Risk Index.

FEMA's Response: Building codes are incorporated into the National Risk Index in a variety of ways. FEMA is exploring how they can be further integrated for each hazard. Currently, building codes are represented as follows:

- Community Resilience: Housing stock construction quality (percent housing units built prior to 1970 or after 2000).
- Historic Loss Ratio: Communities with the adoption of hazard-resistant building codes see a lower hazard loss per basis of exposure.

The adoption of hazard-resistant building codes and improved building standards are a key component in developing natural hazard resilience. The National Risk Index team will continue to investigate how FEMA program data, including building code adoption and enforcement information, can be used to further refine Historic Loss Ratio calculations and to validate the National Risk Index. There are multiple data sources in FEMA that can support historic loss ratio development, and those include, but are not limited to, FEMA's Individual Assistance Program, the National Flood Insurance Program, and the Public Assistance Program. FEMA is honing how the CDRZ effort applies historic loss ratio factors for unique geographies like Alaska, Hawaii, and the territories. FEMA will continue to work to ensure that building code adoption status is adequately represented in the National Risk Index.

Equity

Comments related to equity were focused on five topics: the methodology for calculating Expected Annual Loss, the methodology for calculating social vulnerability and community resilience, methodology transparency, methodology uniformity for all areas of the country and for all hazards, and post-designation impact on designated zones.

Topic 1: Expected Annual Loss (EAL)

Commenters voiced concerns about the methodology for calculating Expected Annual Loss. Commenters suggested that using property value, rather than social considerations, for National Risk Index ratings creates a bias in favor of census tracts with high property values over census tracts with highly vulnerable populations. Commenters suggested that FEMA should emphasize social vulnerability over predicted losses when assessing a community's ability to respond to emergencies.

Commenters noted that FEMA considered the loss of healthy ecosystem benefits in the calculation for developing a benefit-cost analysis for mitigation programs and suggested FEMA do the same in calculating Expected Annual Loss. Some commenters stated that ecosystems, such as wetlands, can help with flood reduction and protection from other natural hazards.

FEMA Response: FEMA is reviewing the methodology and the data used for future Community Disaster Resilience Zones designations and is mindful of the equity concerns expressed in these comments.

Regarding the concern about property value, the National Risk Index uses building replacement value, which is the estimated cost required to replace a building or structure with a similar one after it has been damaged or destroyed by a natural hazard. This value accounts for factors such as construction materials, labor costs, and other expenses necessary to rebuild the structure to its pre-disaster condition.

Any proposed changes to the methodology for a designation will be based on stakeholder feedback and potential solutions will be shared widely with stakeholders, including states, Tribal Nations and territories, for input before making additional designations. FEMA is committed to ensuring that all stakeholders have a mechanism to provide input into the zone designation methodology. As part of this process, FEMA is exploring all options within the bounds of the CDRZ Act to inform, validate and integrate additional data in the designation methodology and process. The CDRZ initiative is committed to maintaining openness and transparency in our methodology for designating any future CDRZs, incorporating the best available data sources for future selections.

Topic 2: Social Vulnerability & Community Resilience

The National Risk Index uses the Center for Disease Control's Social Vulnerability Index (SVI) divided by the University of South Carolina's Baseline Resilience Indicators for Communities (USC BRIC) as input for the National Risk Index rating. Commenters had concerns with each component (SVI and USC BRIC). Concerns focused on specific indicators used in the SVI, the weighting of the indicators, the scale of the data, and that the SVI was not designed for the purpose of designating CDRZs.

Some commenters suggested that FEMA should not integrate the SVI and USC BRIC indexes because there are accuracy, scope, and scale issues as these specific products may not reflect the reality of natural hazard risk factors communities face on the ground. They recommended using multiple social vulnerability indexes and hazard specific social vulnerability indexes to ensure FEMA is representing the social vulnerability of communities more accurately.

Commenters were also concerned about variable weighting. The SVI weighs all variables in the index equally and commenters suggested that this does not work well for risk assessment of natural hazards. Commenters recommended that FEMA create equity weightings based on area median incomes using the concept of marginal utility to ensure that investments target the communities that are the most at-risk.

FEMA Response: FEMA will review the datasets, indices, and methodology for incorporating social vulnerability and community resilience into the CDRZs designation methodology. FEMA will also monitor advances in social science research to validate and identify weighting parameters for social vulnerability and community resilience.

FEMA will continue to engage community stakeholders to identify risks faced within the individual CDRZ, as well as to continue to develop and refine CDRZ methodological approaches.

Topic 3: Methodology Transparency

Commenters expressed concerns that the methodology used to calculate the National Risk Index is not transparent. Many were concerned that because the raw data were not available, stakeholders would not be able to replicate or check the results for accuracy. Commenters recommended that FEMA share the methodology and data so that state and local governments and other stakeholders can calculate adjusted EALs and refine the National Risk Index scores with their additional datasets.

FEMA Response: Transparency is at the core of the this effort, and FEMA has made the designation methodology public, which may be found here. A look behind the National Risk Index—including a literature review, a description of three working groups composed of potential users, subject matter experts, and interested stakeholders, data and methods, and a list of risk index contributors—is available at Behind the Risk Index | National Risk Index (fema.gov). The National Risk Index webpage also includes the latest version of the National Risk Index, National Risk Index raw data, an interactive map, Frequently Asked Questions and more.

Additionally, the methodology and data behind the Climate and Economic Justice Screening Tool (CJEST)—the second element of the designation methodology—is openly available online

Topic 4: Hazard Uniformity

Commenters expressed concerns about using a single methodology to aggregate risk for all areas of the country and for all hazards. Using a uniform methodology does not consider geographic differences, urban and rural differences, and that aspects of social vulnerability may be different based on the hazard. Several commenters recommended integrating local and state data into the designation methodology.

FEMA Response: FEMA used two platforms for the initial round of designations—the National Risk Index and the Climate and Economic Justice Screening Tool. The National Risk Index and the Climate and Economic Justice Screening Tool are robust datasets, highlighting numerous hazard risks and categories of burden, respectively. These tools are frequently updated with new information to better understand risks communities face across the country.

FEMA will continue to review state, territory, and Tribal hazard mitigation plans, Threat and Hazard Identification and Risk Assessments, and Community Development Block Grant – Mitigation Action Plans to understand what additional data sources are available to support the National Risk Index and future designations. FEMA is also actively reviewing all feedback from the initial cohort of CDRZ designations and are reviewing all options available to the Agency under the relevant legislation.

Topic 5: Post-Designation Impact

Commenters expressed that there may be challenges after zones have been designated. Concerns were focused on technical assistance and unintended consequences.

Commenters recommended that FEMA partner with Congress, federal agencies, and other public and private sector entities to help provide resources, including technical and financial assistance, to designated communities. Commenters also recommended that FEMA loosen the requirements associated with Benefit-Cost Analysis for CDRZ communities and to take a flexible approach to the local cost share requirement.

Commenters also stated that all FEMA decisions regarding CDRZs should be approached through the lens of compliance with the Rehabilitation Act, specifically around Sections 504 and 508. Additionally, they recommended that FEMA work to support the building of social and community resilience and adaptation, in addition to physical infrastructure.

Many commenters were concerned that CDRZs projects could cause displacement. Commenters urged FEMA to ensure that resilience and mitigation projects are sited and designed intentionally to avoid involuntary displacement of residents.

Commenters suggested that projects in high-risk areas that do not fall into an identified census tract could be overlooked. Others expressed that highlighting that certain communities may be more hazard-prone could generate changes in home values and other economic issues. Additionally, commenters noted that differences in critical communication infrastructure—such as internet, phone, etc.—will need to be considered in any engagement strategy with the designated zones.

FEMA Response: Post-designation assistance is among the most critical components of the CDRZs effort. FEMA encourages respondents to see FEMA's answers in the Post-Designation Support and Community Engagement sections of this document. FEMA is actively engaging with public and private partners on outreach and "on the ground" impacts will be an important element in those conversations.

FEMA emphasizes that the CDRZs effort is in no way meant to crowd out other resilience efforts in census tracts that have not been designated as CDRZ. The fact that a census tract has been designated a CDRZ does not mean that resilience projects in neighboring areas will be overlooked. Rather, FEMA intends for the CDRZs to help guide resources toward the nation's most at-risk and in-need communities, while continuing to support nationwide resilience efforts.

FEMA also encourages respondents to see the responses in the Community Displacement section below.

Community Displacement

Comments regarding displacement were focused on equity and community involvement in any displacement decisions.

Equity and Community Involvement in Displacement

A few commenters mentioned displacement and relocation concerns and urged FEMA to ensure that communities are involved in decisions that could lead to displacement. Commenters were concerned that the most disadvantaged communities would be more likely to be relocated. Commenters suggested that displacement decisions should be community based and that FEMA should work to provide technical assistance to displaced residents, their communities, and local leaders. Commenters also recommended that FEMA leverage Department of Housing and Urban Development (HUD)-approved housing counselors to assist residents who might be displaced. Some commenters also noted the need for additional grant funding for displacement assistance.

Multiple commenters noted that displacement actions with community "buy in" are far more likely to be successful. Furthermore, commenters noted that clear communication is imperative when engaging in displacement activities with affected residents and communities. Transparency around any action prior to displacement is critical to this "buy in."

FEMA Response: FEMA appreciates these comments and takes potential displacement very seriously. Displacement was also a significant element of the underlying legislation, as the Community Disaster Resilience Zones Act—42 U.S.C. 5136(i)(3)—puts a number of protections in place for residents affected by a certified resilience or mitigation project, including that "the entity performing the resilience or mitigation project shall provide, at the option of the resident, a suitable and habitable housing unit that is, with respect to the housing unit from which the resident is displaced, of a comparable size, located in the same local community or a community with reduced hazard risk; and offered under similar costs, conditions, and terms." Additionally, the entity shall "ensure that property acquisitions resulting from the displacement and made in connection with the resilience or mitigation project--are deed restricted in perpetuity to preclude future property uses not relating to mitigation or resilience; and are the result of a voluntary decision by the resident." Lastly, the entity shall "have a plan for robust public participation in the resilience or mitigation project."

A zone designation does not make relocation projects more or less likely in disadvantaged areas; however, if a relocation is necessary, the zone designation may itself facilitate access to federal funding and technical assistance. Community engagement and concurrence are an important part of the application process for FEMA funded projects, and FEMA plans to partner with other organizations that have a better understanding of the community's needs to achieve these goals.

Lastly, FEMA thanks commenters who suggested leveraging HUD-approved housing counselors. As noted, FEMA is working with a number of our interagency partners – including HUD – to work to leverage CDRZs into existing programs.

Conclusion

The overarching objective of the Community Disaster Resilience Zones initiative is to drive resources to our nation's most at risk and most in need communities. The initiative includes wide ranging technical assistance in addition to the financial assistance offered through the increased federal cost share for the Building Resilient Infrastructure and Communities grant program and technical assistance for the Flood Mitigation Assistance grant programs. Technical assistance is often provided when communities may not have the resources to support resilience planning or project solution design on their own.

FEMA technical assistance has included climate risk assessments, community engagement, partnership building, mitigation, and climate adaption programs, among others. Additionally, federal departments and agencies are continuing to evaluate opportunities for designated zones to benefit from expanded eligibility and access to federal grant programs.

The goal for these designations is that support for these zones transcends what government alone can do. As such, FEMA encourages potential resilience partners to consider involvement in the effort. FEMA recognizes that these organizations may have a better understanding of the needs and challenges of local communities and FEMA values their input regarding activities in the designated zones. FEMA has also received support from several partner federal agencies, including the Environmental Protection Agency, the Department of Housing and Urban Development, and the Small Business Administration, among others, for the use of CDRZ as an element of their existing programs.

FEMA thanks commenters for their vital feedback on the CDRZ effort. FEMA intends to continue to collect thoughts from our partners and use the feedback to inform our approach going forward for this initiative's critical mission to serve our nation's most at-risk and in-need communities.