



July 18, 2016

Office of General Counsel, Regulations Division
Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-001

Re: Docket No. FR 5981-P-01

Dear Sir or Madam:

Thank you for the opportunity to comment on the Department of Housing and Urban Development's proposed rule to update the existing consolidated planning process. The Pew Charitable Trusts strongly supports the newly proposed requirement to incorporate assessments of current and future natural hazard risks into these plans to ensure smart and lasting investments that will better protect people and property.

As HUD itself points out, the consolidated planning process utilized by jurisdictions around the country allows them to identify housing and community development priorities, engage local stakeholders and potential community investment partners, and make data-driven decisions about how best to target the resources that are available to them from key HUD programs, including the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, the Emergency Solutions Grant (ESG) Program, and the Housing Opportunities for Persons With AIDS (HOPWA) Program.

We strongly support requiring current and long-term risks posed by natural hazards to be considered in these plans which can become critical elements in guiding how and where community development occurs. We believe that HUD's proposal to allow jurisdictions to use the Climate Resilience Toolkit or other State or local climate risk related data, including FEMA approved hazard mitigation plans, is a practical approach to assuring that community investments will be more durable and resilient over the long-term. This will be particularly valuable for the case of flooding, which has become the nation's most frequent and costly disaster.

While specific proposals for projects using CDBG or other federal funds should ultimately be subject to site-specific reviews for flood risk under the long-standing Executive Order 11988, we believe that delaying any serious consideration of flood or other natural hazard risk until after a project has been designed, could, in many cases, result in missed opportunities for creating resilient and flood-ready communities.

The proposed requirement can work in concert with the individual project reviews and serve as an important catalyst – prompting communities to consider the geography of flood zones, sea

level rise, and other potentially changing natural hazards at the outset as they look at the locations that are best suited for new housing and other development.

We believe that this upfront location consideration is particularly important for the programs HUD administers that serve the needs of low and moderate income individuals and families. As Enterprise Community Partners, Inc., a leading organization supporting affordable housing has noted, these vulnerable populations often have the fewest resources to rebuild and are at the greatest risk of displacement once a natural disaster strikes.¹ In addition, as the Insurance Institute for Business and Home Safety points out, low-income individuals and families “often live in the most vulnerable housing and lack the resources to undertake recommended loss-reduction or evacuation measures.”²

By asking communities to base their consolidated plans on where risks are greatest or will likely be greatest in the future, the Department is helping to protect these vulnerable populations and to build strong, sustainable communities.

Again, The Pew Charitable Trusts strongly supports the proposed rule and greatly appreciates this opportunity to comment.

Sincerely,

Sincerely,



Laura Lightbody, project director
Flood-prepared communities



Velma Smith, officer
Government relations

¹ Enterprise Community Partners Inc., <http://www.enterprisecommunity.com/news-and-events/news-releases/disaster-readiness-symposium>

² Insurance Institute for Business & Home Safety, <https://disastersafety.org/ibhs-public-policy/vulnerable-populations/>