



July 25, 2023

The Honorable Deanne Criswell, Administrator  
Federal Emergency Management Agency  
500 C Street, S.W.  
Washington, DC 20007

**RE: AIA Response to Federal Emergency Management Agency's (FEMA) Notice and Request for Information on Implementation of the Community Disaster Resilience Zones Act of 2022 [Docket ID: FEMA-2023-0009]**

The American Institute of Architects (AIA) represents over 96,000 architects and design professionals. Since 1857, AIA has been committed to safeguarding the public's health, safety, and welfare and improving the nation's quality of life through design. Central to that mission is AIA's commitment to advancing greater equity and resilience in the built environment.

AIA worked with members of Congress on both sides of the aisle last year to help bolster support for the Community Disaster Resilient Zones (CDRZ) Act of 2022 and applauded its passage since it addressed key priorities within AIA's strategic imperatives to promote climate action and equity in the built environment. It also recognized that communities most likely to withstand the worst of the impact of climate change are often the communities least able to recover financially when disasters strike. AIA appreciates the opportunity to provide feedback on the CDRZ Act to help assist the Federal Emergency Management Agency (FEMA) with its implementation.

**A. Risk Assessment- General Questions**

1. AIA members and their firms typically use risk assessment products and associated risk ratings to share general information with their clients' proposed projects on a high level in order to discuss these risks with stakeholders, insurance providers, and financial institutions. Most of our members use government and Non-Government Organization (NGO) tools with science-based targets. However, these tools do not include risk ratings. Some states occasionally have information available at the individual property level. However, this is not typically the norm. It would be extremely useful to have this level of detail for all locations within the United States that is open source with free access to both financial and societal cost information.
2. AIA members and their firms do not generally use the National Risk Index because they are under the impression that it is based on historic data and does not incorporate climate impacts.
3. Risk Assessment capability within FEMA should have more detailed information from State, Local, Tribal and Territorial partners, if the agency can ensure that it is science based and uniform.
4. It would be ideal if FEMA's hazard assessment products could be combined with existing State, local, Tribal and Territorial tools, such as California's CAL-Adapt and Our Coast Our Future hazard maps.

5. FEMA can step up the communication through local governments and their chief resilience officer if they have one, Chambers of Commerce, local nonprofit organizations focused on communities of color, local chapters of the AIA and similar professional associations for professional engineers and attorneys. Other groups and organizations that FEMA can partner with to increase outreach are insurance companies, AARP, Centers for Independent Living, Regional Centers, and faith communities, among others

#### ***B. Risk Assessment- Methodology***

2. The formula used to derive the National Risk Index risk ratings makes sense abstractly, but Social Vulnerability & Community Resilience are 'quantified' so differently from expected annual loss that a simple explanation for the average consumer would be helpful.
3. The National Risk Index incorporating Expected Annual Loss information should also include climate change using the IPCC RCP scenarios.
4. The National Risk Index could better represent the broader societal impacts of natural hazards and/or measure how different populations are vulnerable to natural hazards by connecting with hyper-local organizations in communities to get real-time data. It would engage the public further and benefit everyone.

#### ***C. Risk Assessment- Data***

1. To ensure that the National Risk Index is using the 'best data,' it needs to be science-based and/or peer reviewed, where applicable. If the data can be updated in real time that would be the most beneficial.
4. FEMA can leverage data from local sources for place-based approaches by building awareness and engagement through local high schools, community colleges, and civic organizations to help gather this data and share it with the agency.

#### ***D. Climate Change and Future Conditions Data***

1. FEMA should incorporate climate change and future conditions based on current Intergovernmental Panel on Climate Change Representative Concentration Pathway (IPCC RCP) scenarios and should integrate them into existing national science-based data sources so that they are not duplicative or independent of each other.
2. The National Risk Index should incorporate derivative climate change and/or cascading effects of natural hazard incidents with scenarios from best to worst case scenarios.

#### ***E. Questions to Identify Community Disaster Resilience Zones***

1. Below are a few case studies of how community engagement was done successfully that FEMA can replicate when conveying to communities that they are being designated community disaster resilient zones.

##### ***Harris County, Texas: Wide range of community engagement vehicles***

Harris County, Texas, successfully purchased over 3,000 properties through a voluntary home buyout program, reducing the number of residents who live in flood-prone areas and restoring land to natural flood mitigating conditions. The Harris County Flood Control District (HCFCD), which ran the buyout program, created a user-friendly website that provided visitors with approachable educational material about the buyout process. Residents were informed about the risks and benefits through videos and infographics. They were also engaged through mail campaigns, door-to-door visits, and community meetings. This outreach provided them with the

necessary information to make an educated decision whether to participate in the program, prevented the spread of misinformation.

***Woodbridge Township, New Jersey: Transparent leadership***

Another exemplary case of communication and outreach, Woodbridge Township in New Jersey joined the statewide Blue Acres Buyout Program in the aftermath of Hurricane Sandy and bought out almost two hundred properties, restoring the bought land to natural flood buffer. The mayor fostered trust and open communication with residents after promising at the beginning of the program that “the state nor the township would not use its power of eminent domain to acquire homes”<sup>19</sup> and that buyouts would be entirely on a voluntary basis. The program became further attractive and approachable when “one resident spearheaded an education and outreach campaign with the support of the state, the township, and The Land Conservancy of New Jersey.” Public officials attended meetings and connected with residents to answer questions. State and local staff made efforts to get to know the applicants to provide them with technical assistance, connecting them with local organizations who could assist with acquiring rental housing and covering closing costs. By the end of the program, only thirteen homes were not bought out.

***Hampton, New Hampshire: Empowering residents to drive planning***

By educating, engaging, and surveying its residents, the town of Hampton, New Hampshire, determined its course for long-term planning. A local conservation nonprofit, the Seabrook Hamptons Estuary Alliance (SHEA) led the work and began with holding workshops to inform property owners and elected officials about the risks facing the town’s properties, the benefits and challenges of buyouts, and participants had opportunities to raise and discuss their concerns. SHEA and New Hampshire Coastal Program also set out to gather data about residents’ understanding and perspective about managed retreat, conducting a Situation Assessment which “found that 94 percent of respondents believed that Hampton needs a long-term adaptation strategy, and 71 percent agreed or strongly agreed that managed retreat could be one component of a long-term adaptation strategy” and “over two-thirds of participants agreed or strongly agreed that they would participate in future discussions about managed retreat or voluntary buyouts.” Through a phased approach, the Coastal Hazards Adaptation Team (CHAT) has continued regular discussions and study of managed retreat and in 2019, the town decided to apply for a FEMA Pre-Disaster Mitigation grant.

3. FEMA can help U.S. Territories ensure that resources can be allocated more efficiently and effectively to support disaster resilience efforts by letting local government & community organization know what information is needed and leveraging their expert knowledge of their community.
5. FEMA is in a unique position to encourage collaboration because of its experience that jurisdictional boundaries are completely irrelevant in natural hazard risks.
6. Significant barriers in accessing Federal resources are created by excess complexity. Disasters are inevitable and increasingly destructive, and the best way to recover from them is to acknowledge that we will experience them and have the resources in place ready to deploy when and where they are needed. This can (and does, in many cases already) take many forms, from hyper-local to Federal level. The American public needs all of them.

### ***F. Resilience Mitigation Project Planning Assistance***

1. The most useful and equitable way for FEMA to provide financial and technical assistance to benefit communities with Community Disaster Resilience Zones (CDRZ) is to require them to create and execute a resilience plan which incorporates planning, applying for, and evaluating resilience & mitigation projects before a disaster strikes. Local capacity building that involves all impacted community members is the best way to increase awareness and engagement. The most effective way has been to have local organizations take responsibility for this work with FEMA helping to hire any missing skillsets who are then required to help train local community members as part of the work.
5. The potential unintended consequences of CDRZ designation could either cause community property value to decrease or increase – either might happen. The designation might discourage business development as well as placement of needed resources such as schools and hospitals in the area.

### ***G. Community Disaster Resilience Zone Project Applications and Certification Process and Other Investment Opportunities***

1. “Minimizing applicant burden” should not be used as an excuse to avoid local engagement. FEMA must engage trusted members of the local community.
3. FEMA can monitor progress of improving resilience in community disaster resilience in community zones over time by using performance metrics such as local health department indicators, school graduation rates, employment rates, air quality, broad diversity of participation in community life, quality-of-life satisfaction, community pride, and community confidence in preparedness for disasters, among others.
4. FEMA should use the CRDZ designation as a positive indicator of the community’s future economic potential due to the ability to access federal funding to plan for resilience projects that will help them reduce impacts caused by climate change and natural hazards.

### ***H. Community Disaster Resilience Zone Projects Causing Displacement***

Communities can benefit from managed retreat. And as controversial as its discussion has been, real-life examples show us how managed retreat can be conducted and which obstacles need to be overcome.

*a) There should be more resources and financial support for low-income communities to conduct managed retreat.*

*b) Transparency and trust are needed to educate, engage, and empower residents.*

For managed retreat to be positive and productive, it needs residents to be interested and to participate. Elected officials and staff involved in the planning and execution of managed retreat need to have open, transparent conversations and build trusting relationships with residents. Residents need to know that a change that would so deeply affect their lives is not taken lightly and would not be made without their consent, input, and involvement. Although relocation might benefit communities overall, affected persons need to feel seen and heard throughout the process. When residents know and trust elected officials and staff who are involved, they not only are more likely to cooperate, but also to support, engage in, and advise the process. Their participation is indispensable.

*c) Communities can be flexible and creative in the way they incorporate managed retreat into their climate adaptation plans.*

Managed retreat can be problematic if applied without consideration of a community’s limitations and the attitudes of residents. But when conducted equitably and with the

support of residents, managed retreat can be molded and shaped to fit the available resources and needs of the community.

AIA stands ready to assist in the implementation of this important piece of legislation. Again, we remain strongly supportive of your efforts.

Sincerely,

A handwritten signature in blue ink that reads "Anne Law". The signature is fluid and cursive, with the first name "Anne" and the last name "Law" clearly distinguishable.

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