



July 21, 2021

Deanne Criswell, Administrator  
Federal Emergency Management Agency  
500 C Street SW  
Washington, DC 20024

**Re: Comments in Response to FEMA’s Request for Information on FEMA Programs, Regulations, and Policies**

Dear Administrator Criswell,

On behalf of Enterprise Community Partners Inc., thank you for the opportunity to provide input on FEMA programs, regulations, collections of information, and policies for the agency to consider modifying, streamlining, expanding, or repealing in light of recent Executive orders. We submit for your consideration recommendations to best guide FEMA to effectively achieve the agency’s mission in a manner that furthers the goals of advancing equity for all, including those in underserved communities; bolstering resilience from the impacts of climate change, particularly for those disproportionately impacted by climate change; and seeking environmental justice. We thank you for considering our recommendations and would be honored to discuss them with you in the near future.

Enterprise is a national nonprofit on a mission to make home and community places of pride, power and belonging, and platforms for resilience and upward mobility for all. For more than 40 years, Enterprise has been committed to helping communities break down silos and build organizational capacity in both the public and private sectors so that funding is deployed more effectively. To date, we have invested \$61 billion to help create or preserve 793,000 homes in all 50 states plus the District of Columbia and Puerto Rico. We work deeply across 11 markets in the US to create opportunity for low- and moderate-income households.

Through our Building Resilient Futures<sup>1</sup> initiative, we are working to ensure that sustainable, resilient, affordable housing is designed, built and operated to mitigate, adapt to and recover quickly from disasters. Investing in resilient infrastructure saves lives, reduces disaster costs, enables business continuity, creates jobs, and addresses social inequities.

Enterprise is invested in promoting resilient and affordable housing because low-income households and communities of color are most likely to be harmed by disasters and tend to be the people and places slowest to recover. Socially vulnerable populations are also more likely to live in physically vulnerable areas that have greater natural hazard risks due to historical, economic, and political factors. The shortage

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<sup>1</sup> <https://www.enterprisecommunity.org/solutions-and-innovation/building-resilient-futures>

of affordable homes across the United States has reached a veritable tipping point; in addition to losses from market forces, we are losing affordable homes due to extreme storms and other disasters every year.

The impacts of our changing climate put millions of households at risk of uninhabitable housing conditions, exacerbating the vulnerabilities of lower income households and communities of color. Disasters uproot whole communities, damaging homes and infrastructure on a scale they have rarely experienced, and the reality is that an increasing number of communities across a wider scale of geography must expect and be prepared for severe hurricanes, floods, and fires in coming years.

As communities suffer multiple events in shorter periods of time, the number of impacted housing units, especially affordable multifamily housing units is staggering. A recent study by Climate Central estimates that “by 2050, virtually every coastal state is expected to have at least some affordable housing exposed to more than one coastal flood risk event per year, on average—up from about half of coastal states in the year 2000.”<sup>2</sup> Yet nearly 200,000 federally subsidized rental housing units are located in floodplains. Another report projects that 30 million people live in the combined 100-year and 500-year flood plains, mostly low-income and communities of color.<sup>3</sup>

Due to its age, physical condition, and maintenance needs, most of the country’s existing affordable housing cannot withstand our changing climate. At the same time, the systems designed to support affordable housing and its residents – from policy to financing to insurance to federal recovery programs – inadequately address today’s needs, compounding the challenges faced by owners and residents.

## **Legacy Matters**

Understanding the historical legacy of housing discrimination facing communities of color and low-income communities matters as its effects continue to manifest today in the form of low employment, displacement, and lowered health indicators. Therefore, it is important to recognize the underlying impact of current and legacy policies and the resulting structural inequities in the context of advancing systemic change. For example, when we seek to mitigate climate-related risks such as flooding in a community, we need to understand the higher-level causes of flood damage such as undersized or unmaintained sewers, antiquated pump systems, and the economic and racial forces leading to homes being built in risky flood plain areas, among others. Addressing racial and environmental equity in the context of advancing resilience reveals that we need a holistic review and restructuring of policies, institutions, and systems that reduce the fragility of our nation, particularly for the most vulnerable communities and their residents.

The combined impact of legacy land use and financing policies such as redlining, slum clearance, and exclusionary zoning, to name but a few, have marginalized communities politically, economically, and structurally through increased exposure to climate risk and with fewer local resources and capacities to

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<sup>2</sup> Climate Central. “Report: Coastal Flood Risk to Affordable Housing Projected to Triple by 2050.”, November 24, 2020. <https://www.climatecentral.org/news/report-coastal-flood-risk-to-affordable-housing-projected-to-triple-by-2050>.

<sup>3</sup> NYU Furman Center. “Report: More Than 30 Million People Live in U.S. Floodplains.” <https://furmancenter.org/thestoop/entry/new-data-from-the-nyu-furman-center-finds-that-more-than-30-million-people>.

either mitigate the risks or fully recover in the aftermath of an adverse event. Too often, these inequities and the overlapping risks they present persist long after the initial storm, fire, or pandemic event.

Many of these communities also bear a greater burden as insufficient support systems lead to exacerbating inequities. A 2019 study found that the rate of approval of FEMA grants was much lower among homeowners living in areas with a larger proportion of nonwhite residents, lower incomes and credit scores.<sup>4</sup> This imbalance comes to public attention as climate change increases both the frequency and destructive impact of storms, wildfires and other disasters, with historically marginalized communities both more exposed to damage and less able to recover financially from such events.

**The following recommendations will help FEMA strengthen programs, policies and procedures to reduce risk to millions of vulnerable households, focused on housing, disaster recovery, hazard mitigation, climate resilience and equity:**

**I. Increase awareness and accessibility of information on foreseeable risks communities face:**

Many communities and homeowners do not fully understand their current and future risk of hazards, especially from flooding—which causes the most significant economic damage. Research suggests that FEMA flood maps only account for one-third of buildings at risk of serious flooding. Understanding and interpreting risk data for communities on the frontline is a critical and fundamental first step in helping communities prepare, adapt to and mitigate risk. We need accessible, and actionable data that can be used by communities, jurisdictions, and households to adjust their homes and lives to the new reality of a volatile and changing climate.

**Strengthen data collection and data sharing on risk particularly on flood maps as well as fire risk**

- Federal data should be easily accessible by everyone, and equitably distributed to marginalized communities to help them prepare for the next disaster and get insurance coverage, as these communities are disproportionately impacted by disasters. Enterprise recommends that the federal government increase awareness about the actual hazard risks communities face by providing the best available science and data on climate risk uniformly across the country, at the address level. For example, 2020 estimates suggest that 14.6 million properties are at risk from what experts call a 100-year flood, which is nearly double the number of properties reflected on federal flood maps.<sup>5</sup>
- Following an event, it is important to increase the transparency and distribution of data from FEMA on unmet needs of communities and the development of social vulnerability to support communities and jurisdictions in their recovery planning. Automatic provision of near-real-time individual assistance data (scrubbed of personally identifiable information but at a granular level of geography) through FEMA's OpenFEMA data portal would allow stakeholders and advocates the ability to monitor and facilitate the equitable distribution of assistance, including targeting impacted but underrepresented communities for application assistance or other forms of relief. Longer term, this would also help jurisdictions plan more effectively as new risks and hazards emerge over time—which we know, will inevitably occur.

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<sup>4</sup> [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3396611](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3396611)

<sup>5</sup> <https://www.nytimes.com/interactive/2020/06/29/climate/hidden-flood-risk-maps.html>

- As part of the Mitigation Assessment Process, a report issued after a disaster which “looks back” at the event, it would be helpful to show both best practices in recovery as well as failures that led to inefficiency and gaps in progress and service delivery. The transparency will allow for building better practice and program development.

**Leverage new technologies to consolidate information**

- The marketplace has been generating new digital platforms and technologies to help communities understand and identify their exposure to climate risk, so information is more accessible and easier to understand. Enterprise, for example, has created a tool, called “[Portfolio Protect](#)” to help housing owners risk rate their properties and site locations. This tool has become widely popular with affordable housing providers in vulnerable zones who need to understand risk due to earthquake, fire and flooding.
- We need a consolidated platform where communities can access information about their risk and programs to help them reduce their hazard risk as well as adapt to the changing conditions of risk. Ideally, the consolidated platform should include not only data based on current risk, but given the long-term investments being made in housing and community infrastructure, should include options for modeling risk based on future climate conditions, based on the increased frequency and shifting locations of adverse events as well as on changing hydrological patterns.

**Streamline programs and policies to reach more disaster survivors, especially in vulnerable and marginalized communities**

After a major natural disaster, families experience elevated levels of financial and emotional stress due to a range of factors including dislocation, exposure to environmental hazards and unemployment. Survivors also confront a complex and opaque web of federal agencies and have the burden of determining which forms of assistance they are eligible for.

Enterprise, for example, has a program called Community Powered Resilience in our Northern California Market which is working to translate this complicated web of information into actionable, accessible information on all pieces of emergency management for frontline communities and the people that serve them. We recommend ensuring that all programs, policies, and processes are written at a ninth-grade level and filled with visuals that help people understand how FEMA and the ecosystem of the disaster life cycle works.

- FEMA should coordinate with multiple federal agencies that provide post-disaster relief and pre-disaster support such as HUD, USDOE, EDA and SBA to develop a common application for federal disaster assistance. This directive could be accomplished through either legislation or Executive Order.
- In addition to this, FEMA should require that housing counseling and case management is provided to all families that request or may need assistance after a disaster. These services are most necessary for low-income people to help them navigate potential program intake backlogs to ensure that they are served in a fair and timely manner. These requirements will preempt time-

consuming decision making for grantees and better serve those vulnerable populations with the least capacity to recover without federal assistance.

- Deliver sustained and skilled technical assistance and launch a national “Resilience Help Desk” to support community mitigation, adaptation, and preparedness for extreme weather and other climate impacts. Centralized resources should be available to help applicants navigate the range of federal programs, including FEMA’s Building Resilient Infrastructure and Communities Program (BRIC).

## **II. Reform disaster recovery programs at FEMA to ensure equity for all:**

### **Ensure equitable distribution of funding and program support for Black, First Nation, undocumented immigrants, and other people of color and low-income families who rent their homes**

Day-to-day stressors of our changing climate and policies that explicitly or implicitly pushed low-income communities and communities of color to marginal locations, have also put them at elevated physical and financial risk from extreme natural hazard events. In addition to being more likely to live in physically vulnerable areas with greater natural hazard risks due to historical, economic, and political factors, residents of these communities also tend to live in lower-quality homes that are less stable in the event of extreme natural hazard exposure. These same individuals tend to be less likely to have the resources necessary to prepare for a disaster and tend to lack the savings needed after disasters strike<sup>6</sup>; as a result, they take longer to recover—if they recover at all. In addition to the disparate impacts, past rebuilding programs have emphasized home rebuilding for homeowners vs. renters to rebuild and/or recover in place, which has the consequences of skewing money towards higher income households. The result, as the data shows, is that natural disasters exacerbate wealth inequality.<sup>7</sup>

- FEMA should reform the Individual Assistance program to ensure that our undocumented residents are eligible.
- FEMA should work with Congress toward ensuring equitable distribution of funds between homeowners and renters based on unmet needs. One type of housing assistance should not be provided at the expense of the other.
- FEMA should ensure an equitable distribution of Individual Assistance funds, commensurate with need and local market factors.
- FEMA should ensure that Public Assistance funding, which supports the immediate recovery needs of communities across the nation is made as publicly accessible to communities as possible and clearly communicated regarding legitimate uses. Many jurisdictions do not have full understanding of how PA can be used to support local needs and as a result have to rely on external consultants and private contractors to provide input—which costs money, capacity and delays recovery.
- Many renters lack appropriate insurance coverage, and the majority of rental insurance policies only cover content loss. This puts many renters at an extreme financial disadvantage. Lack of insurance can lead to permanent housing displacement, loss of income and contents, and further

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<sup>6</sup> <https://www.cnbc.com/2021/01/11/just-39percent-of-americans-could-pay-for-a-1000-emergency-expense.html>

<sup>7</sup> <https://academic.oup.com/socpro/article/66/3/448/5074453?login=true>

aggravate the income divide between owners and renters in a community. FEMA should invest in promoting and developing products such as a pooled insurance product that could be subsidized by communities to assure renters have sufficient coverage, even in the event that households cannot afford to purchase policies independently.

**Implement temporary-to-permanent housing solutions post-disaster in communities with emphasis on tribal communities**

Post disaster, tribal communities are often faced with the lack of development of replacement housing or extreme crowding in existing housing. As a consequence, temporary FEMA housing become de facto permanent housing. Post disaster, many families never recover or regain their housing and are permanently displaced. Enterprise led the development of several guides to defining what resilient housing repairs, modifications and additions should be, both for multifamily, known as the Multifamily Strategies for Housing Resilience<sup>8</sup>, and single family homes, known as Keep Safe.<sup>9</sup> These guides cite best practices that can be used before and following a disaster. Additionally:

- Enterprise invested in the development of two innovative temporary-to-permanent housing solution models to promote a more permanent and substantive re-housing solution following disasters: Mississippi Cottages after Hurricane Katrina in New Orleans, which was a quickly erectable and deployable post-disaster recovery design, and RAPIDO after Hurricane Harvey in Houston that enables quick installation of modular and stick-built housing that easily transitions into permanent housing. Ensuring communities have reliable, affordable and safe shelter immediately after an event and through the years following the event, will not only minimize the financial loss and disruption to communities, but these innovations can provide cost saving in the delivery of disaster recovery programs.
- Programs such as the FEMA STEP program are efforts to triage immediate needs following an event, but they could, and should, be used to support permanent repairs. For example, after Hurricane Maria, in Puerto Rico, both FEMA and the US Army Reserve Command (USARC) installed blue tarps, often referred to as self-help tarps, available throughout local municipalities that homeowners can pick up to help temporarily cover contents of damaged homes until permanent repairs can be made by the homeowner. Unfortunately, many of the tarps are still in place years later, because homeowners don't have the funding to replace the roofs. Due to delays in long-term recovery funding such as CDBG-DR, the roofs remain unsound and unfit for current weather conditions. FEMA should consider authorizing making permanent repairs so that the fixes are made and are able to stabilize housing conditions permanently.

**III. Build and support equitable communities by providing alternative pathways to substantiate homeownership title to assure low-income communities and communities of color receive federal aid:**

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<sup>8</sup> <https://www.enterprisecommunity.org/solutions-and-innovation/green-communities/tools-and-services/ready-to-respond>

<sup>9</sup> <https://keepsafeguide.enterprisecommunity.org/>

Survivors of natural disasters without formal property deeds, specifically low-income households, rural and tribal communities without clear land titles, often face barriers to accessing federal recovery aid, including federal loans and grants from FEMA. The challenges faced by heirs' property owners are greater especially after a disaster strikes as they are barred from crucial aid. We saw this on the ground after Hurricane Katrina, and a USDA report confirmed that after Hurricane Katrina in 2005, 20,000 heirs' property owners were ineligible for federal assistance due to the lack of clear titles. Again, we saw in Puerto Rico that title issues related to local informal ownership customs led to the denial of more than 80,000 applicants after Hurricane Maria in 2017.

According to a Washington Post analysis, the aid request denial rate in predominantly Black counties is twice as high as the national rate of two percent, as Black property owners are twice as likely to pass down property informally. The analysis notes that this issue is particularly challenging in the South, where more than a third of Black-owned land is passed down informally without clear titles or deeds and in tribal communities where land is passed down informally as well. The latter results in heirs' property or jointly owned property without proper titles leading to a loss of property and benefits.

#### **Adopt a national policy allowing attestations or other alternatives to proof of title**

- Enterprise urges FEMA to adopt a national policy allowing attestations or other alternatives to proof of title to expand federal aid and increase equity in disaster recovery. This ongoing issue perpetuates inequities in the disaster recovery system. FEMA's requirement for disaster survivors to provide proof of homeownership in order to receive assistance in most cases creates ongoing inequities in the disaster recovery space. While we understand the importance of protecting taxpayer dollars from fraud, as applied, this requirement leads to high levels of aid request denials in predominantly Black counties. The guardrails have done more than prevent fraud – they have prevented FEMA from serving disaster survivors who need the assistance most.
- We have worked with communities to develop alternative scenarios that have successfully supported communities in recovery. For example, in 2018, under pressure to resolve the crisis in Puerto Rico, the legal community created a process for people to self-certify homeownership, which only applied to island and tribal areas.<sup>10</sup> The flexibilities established in Puerto Rico should be incorporated into national policy.

#### **IV. Protect communities and affordable housing by increasing flood insurance coverage to maintain affordability and reduce flooding risk:**

##### **Maintain insurance affordability for affordable multifamily housing**

- FEMA should ensure risk is reduced while spreading premium increases for affordable housing owners in an equitable manner. While we support efforts to bring premiums more in line with risk and make the NFIP more financially sound, we are concerned that increasing flood insurance costs will force owners of affordable housing properties to raise rents, exacerbating the shortage of affordable rental housing at a time where the nation is experiencing an affordable housing crisis.

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<sup>10</sup> <https://ayudalegalpr.org/>

- We support capping the premium rates for policy holders so that housing costs remain affordable and support a voucher or subsidy for homeowners with 1) a household income at or below 80 percent of area median income and 2) a demonstrable need, so that increased premiums would not pose a hardship. We also want to ensure this cost-share is also extended to rental households. Moreover, Congress should require FEMA to offer a 0 percent or low-interest loan to affordable housing owners to fund mitigation projects to reduce risk to properties and residents and to offer discounts on insurance premiums for properties taking such flood mitigation measures.

**Reduce flood risk of affordable multifamily housing**

- Define and disseminate practical mitigation strategies for multifamily housing owners and offer to provide credit incentives for their NFIP policies. Incentivizing property owners to mitigate, by providing a credit against their NFIP policy, would result in increased investment in building protection, workforce development and job creation, reduced risk and savings for the NFIP. Enterprise’s Keep Safe Miami Program is a partnership between Enterprise and the City of Miami, Miami-Dade and Miami Beach to provide accessible, free tools to owners of multifamily housing to help them identify where to invest in their properties to reduce risk from storms, heat and flooding.<sup>11</sup> We have created tools to help owners identify their risk such as Portfolio Protect—a non–investment-grade risk rating tool to help owners get a sense of their exposure.<sup>12</sup>
- Increase the amount of Increased Cost of Compliance (ICC) funding available to multifamily housing owners after a flood event to ensure multifamily housing is rebuilt in accordance with current code and incorporates strategies that support its resilience to flooding. Currently all housing owners are allotted \$30,000 to make post-flood repairs and bring their buildings to current code, regardless of building size or typology, an amount that is woefully insufficient to rebuild multifamily housing, let alone pay for measures that improve resilience. We support increasing ICC coverage from the current \$30,000 to \$100,000 or more.
- Increase coverage limits for multifamily structures. Enterprise has substantial experience in rebuilding multifamily housing in the Gulf Coast after Hurricane Katrina and other subsequent storms in the region. Many other properties we have financed and developed have been in a floodplain and therefore required NFIP coverage. The current NFIP coverage limit of \$500,000 per building is inadequate for most multifamily buildings. The current \$500,000 limit results in many properties being underinsured, and sometimes leads to convoluted designs intended to allow properties to be considered multiple structures to qualify for more coverage at the development level. For these reasons, we support increasing the coverage limits for multifamily structures to at least \$1.5 million.
- Increase funding support for pre-development activities that will help multifamily housing owners reduce their material risk to climate hazards—supporting innovation in planning, design and implementation before and after natural hazard events.

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<sup>11</sup> <https://keepsafeguide.enterprisecommunity.org/>

<sup>12</sup> <https://www.enterprisecommunity.org/solutions-and-innovation/disaster-recovery-and-rebuilding/portfolio-protect>



## V. Strengthen the Building Resilient Infrastructure and Communities Program:

The BRIC program is a crucial funding source which can help mitigate the risks of climate change and invest in resilient infrastructure. We encourage FEMA to consider the importance of housing as a tool to mitigate hazard in communities. However, state and local needs far exceed available funding as evidenced by the popularity of submissions in the first grant cycle. Recent studies by the International Council of Sustainable Infrastructure and the Milken Institute emphasized that catalytic predevelopment capital has the potential to close the funding gap that prevents projects moving from concept to construction.<sup>13</sup> Prior to providing the funding, the federal government should also assess whether a proposed project takes into consideration future risk. Prioritizing projects that incorporate green standards such as the Enterprise Green Communities Criteria would incentivize grantees to integrate resilience standards in order to receive the funding. Enterprise Green Communities Criteria is one of the nation's only national green building programs designed explicitly with and for the affordable housing sector. Because of our efforts, 27 states and Washington, D.C., incentivize or require that affordable housing developments receiving public funds comply with our standard.<sup>14</sup>

Our recommendations are predicated on the notion that these taxpayer dollars are down payments on disaster mitigation and must be invested with long-term risks and goals in mind and must be oriented toward activities that improve the local understanding and capacity of grantees and communities to address their risks:

### **Maintain a continuous feedback loop on whether programs are enough to meet community needs and provide continuous protection**

Engaging the public at every stage of the process – from design through determination of funding priorities and applications – is a critical component of preparedness, particularly during mitigation and pre-planning, both to educate people about their personal risk and to involve them in community-informed solutions. We recommend carving out a role for public engagement throughout the life of the grant development and determination and particularly encouraging communities to support participation in mitigation planning, which sets the stage for recovery. This ongoing engagement can take many forms but must facilitate and document ongoing community input in both the planning and implementation of mitigation projects. Structured bodies for feedback on multimillion-dollar initiatives will help ensure that they achieve their objectives and best position the grantees to see what their programs and projects may be missing. This process has also the potential to reduce risk.

- Direct grantees to conduct a minimum number of public hearings and/or identify other forums in which to garner public participation to maximize community input and buy-in for all major projects and programs.
- Direct grantees to create advisory bodies from vulnerable communities to consider ongoing decisions and input as programs and projects progress. Grantee should produce periodic reports detailing why proposed changes were accepted or not accepted.

### **Encourage grantees to use funds for nature-based protections that will enable projects to adapt to changing climate conditions, mitigate risk and provide multiple co-benefits.**

- Allow funds to be used for operation and maintenance of green infrastructure projects.

<sup>13</sup> <https://www.milkenreview.org/articles/the-case-for-an-infrastructure-predevelopment-fund>

<sup>14</sup> <https://www.enterprisecommunity.org/solutions-and-innovation/green-communities>

- Encourage development of technical assistance programs to promote innovation, support and education to communities at risk.
- Encourage development of R&D to promote innovation in the field of resilience and adaptation.
- For places prone to severe flooding, design innovative solutions that combine grey and green infrastructure.
- Encourage and allow for the development of fire-wise strategies like setting up and maintaining fire lines, fire-wise landscaping and assessment of risk.

**Permit the use of funds for capacity support to adopt and enforce forward-looking building codes and land use regulation**

As knowledge about risk and mitigation measures increases, so must building codes and land use regulations adapt.

- Allow funds to be used for preparation of educational materials and briefings about the connection between known risk and available mitigation options and technical drafting services for the appropriate legislative body.
- Incentivize grantees to require adoption of forward-looking building codes and land use regulations and zoning that mitigate risk as a condition of receipt of funds by governmental subrecipients.
- Incentivize grantees to use funds for time-delineated initiatives that include the enforcement of existing building codes and standards, staff and administrative purposes, and the development and adoption of more protective building codes and land use ordinances.
- Require projects to consider design standards and approaches so that they can accommodate future adaptations and modifications to address changing future conditions (e.g. flooding from extreme precipitation events and sea level rise beyond 2050 could follow a range of trajectories, so it may make sense in certain circumstances to build to a certain level now and use a design that could be built to a more protective standard at a later date). Grantees may use funds for technical assistance to assist in developing forward-looking codes.

**Require and support local determinations of current and future risk from all hazards**

Risk and vulnerability vary among communities. A community with fewer resources faces greater vulnerability to hazards like floods, wind, and fire than a community with more resources at the same level of physical risk. Resources should therefore be parsed out to support the underlying vulnerabilities faced by communities. Maximizing the use of resources for planning will allow grantees to better comprehend their current and future risk and ensure that this unprecedented investment of taxpayer dollars will not throw good money after bad. The mitigation and resilience field is growing by leaps and bounds due to advances in science and technology, and requiring grantees to incorporate multidisciplinary perspectives on mitigation will ensure best efforts to protect people, property, jobs, and sensitive natural habitats from harm, lessening the possibility that federal funds will be needed to rebuild these areas in the future.

- Allow cities to apply directly for funding.
- Grantees should invest mitigation funds in projects relative to risk, and each overall mitigation plan must consider the regional systems affecting risk, including co-dependencies and cascading impacts, such as water, power, health, and the environment.

**VI. Prioritize hazard adaptation for communities to prevent disparate impact climate change has on the most vulnerable communities:**

**Increase emphasis on employing adaptation and natural infrastructure solutions as part of all hazard mitigation funding, temporary repairs following disasters, planning and technical assistance.**

Encourage program funding to incentivize alignment with green building and resilience standards. We must commit to green building standards to prepare our communities to be climate ready. Housing built or renovated to green building standards reduces instability by reducing energy and water footprints and creating more efficiency. It also leads to more predictable utility expenses, a daily benefit regardless of the weather outside. Green building allows residents to not have to choose between paying their utilities, rent or putting food on the table, and it responds better during climate crisis—ensuring a holistic affordability strategy that keeps residents on their feet. A Southface Institute study demonstrated that green housing developments spent 12 percent less on energy (in common areas) per square foot than non-green developments and residents used 14 percent less energy per square foot.<sup>15</sup>

Over the past 17 years, Enterprise Green Communities Criteria has provided a range of services to raise the standards of sustainable housing for low-income communities nationwide and help advance the field; working directly with the developer community to build capacity and understanding of a holistic approach to green building; and outreach to decision-makers at federal, state, and local levels to develop and promote policies that facilitate green affordable housing development. The benefits of green building are clear, attainable and significant, and will ensure that housing is not only built, but is stable, healthy, affordable and climate ready for many years to come.

We appreciate the opportunity to provide you with input to strengthen FEMA’s work to build equitable, resilient, and sustainable communities, so that households and communities across the nation are able survive and thrive amidst a changing climate. We are your partners on the ground, building affordable, safe and resilient housing; we look forward to working closely with you to build a prepared and resilient nation.

Thank you for your consideration of these comments, and if you have any questions, please do not hesitate to reach out to me ([lschoeman@enterprisecommunity.org](mailto:lschoeman@enterprisecommunity.org)) or Ayate Temsamani ([atemsamani@enterprisecommunity.org](mailto:atemsamani@enterprisecommunity.org)).

Sincerely,



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<sup>15</sup> <https://www.southface.org/wp-content/uploads/2016/07/impact-of-green-affordable-housing-report-1.pdf>