

## CLIMATE RESILIENCE IMPROVEMENTS AND REFORMS UNDER EXISTING FEDERAL PROGRAMS

The Honorable Gina McCarthy  
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The Honorable Shalanda Young  
Deputy Director, Office of Management and Budget  
725 17th Street, NW  
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The Honorable Susan Rice  
Director, Domestic Policy Council  
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Cc:

The Honorable Candace Vahlsing  
Associate Director for Climate, Energy, Environment, and Science  
Office of Management and Budget  
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April 28, 2021

Dear Advisor McCarthy, Deputy Director Young, and Director Rice,

Our nation and the infrastructure it depends on face tremendous challenges due to climate change. We applaud the Biden-Harris Administration's commitment to combating climate change and preparing our country for the new climate future. The needs are great. In 2017 alone, the United States suffered more than \$300 billion in damages from extreme events.<sup>1</sup> In the three years since, hundreds of thousands of American households have experienced devastating fires, floods, and the incalculable human losses of the Covid-19 crisis.

Existing federal programs can meet the challenges our country faces. The American Jobs Plan is one part of many opportunities the Administration has within existing federal programs and structures to better and more equitably prepare for climate change before disasters take place.

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<sup>1</sup> National Oceanic and Atmospheric Administration. 2018. <https://www.climate.gov/news-features/blogs/beyond-data/2017-us-billion-dollar-weather-and-climate-disasters-historic-year>

The undersigned propose 12 key actions the Administration should take under five areas (Managed, Funded, Equitable & Just, Green, and Transparent) to ensure that these and all federal investments lead us toward a more resilient future.

### **MANAGED: Improve governance to meet demands of a changing climate**

#### **1) Establish interagency leadership**

Establish a permanent inter-agency resilience working group.<sup>2</sup> Following Hurricane Sandy in the northeast, the Hurricane Sandy Rebuilding Task Force was created that improved coordination and innovation, including new shared principles for building back better and a design competition that led to resiliency infrastructure going in the ground today (Rebuild by Design). A permanent interagency working group charged with shepherding specific deliverables and responsibilities, including implementation of a Federal Flood Risk Management Standard, establishing national resilience goals and metrics for tracking progress with an emphasis on climate justice, and implementing strategies for achieving those goals.

#### **2) Build to withstand flooding**

Call on all agencies to re-start efforts to develop and implement a Federal Flood Risk Management Standard. This effort can go further, ensuring that all funded projects, post-disaster rebuilds, relevant agencies and sponsored entities (including Fannie Mae and Freddie Mac) develop or adopt resilient design requirements that address future risks. This should include the elimination of HUD rules that might prohibit CDBG-DR funds from being used for resilient retrofits and rebuilding.<sup>3</sup> For infrastructure in high risk, repetitive loss areas, guidance for infrastructure relocation (that does not compromise the integrity of disadvantaged communities) or other strategies should be developed. Pew research poll recently found that 77% of respondents favor requiring all federal spending on resilient infrastructure located in flood prone areas to be constructed to withstand flooding.<sup>4</sup> The Administration should require state, local, and private actors to raise standards (e.g., through a federal law or through tax-based incentives, code, and/or incorporation into hazard mitigation planning guidance). And finally, through increased funding and leveraging interagency expertise from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), and US Army Corps of Engineers (USACE), the Administration should update outdated flood maps and incorporate future risks.

#### **3) Establish national resilience goals and metrics for tracking progress**

With input from stakeholders, local and state governments, frontline community leaders, design and engineering professionals, and public health experts, develop goals for climate resilience and methods for measuring that progress. Goals and metrics should address social vulnerabilities (social, ecological, infrastructure, fiscal) to climate impacts and prioritize equity.

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<sup>2</sup> The need for an interagency task force focused on developing and overseeing the implementation of cross-cutting resilience policies, metrics, and products has been raised by multiple experts and coalitions. See also [A Climate Resilience Road Map for the Next Administration](#) (Kousky, 2020) and [Safer and Stronger Cities](#) (Enterprise, 100 Resilient Cities, and Rebuild by Design, 2018)

<sup>3</sup> Kousky, Carolyn. 2020. [A Climate Resilience Road Map for the Next Administration](#).

<sup>4</sup> Pew Charitable Trusts. [Pew Resilient Infrastructure Survey](#). 2019. SSRS Omnibus and Pew

## **FUNDED: Put funding mechanisms in place**

### **4) Invest in resilient infrastructure and create jobs**

We strongly support the \$50 billion proposed in the American Jobs Plan for infrastructure resilience and billions committed to public transit, transportation, ports and maritime facilities, wind energy expansion, lead pipe elimination, and modernization of the electric grid. We also applaud the plan's commitment to environmental justice and requirements that 40% of investments be directed toward disadvantaged communities. We also support accompanying workforce development investments and commitments to labor standards. The Administration should also require all infrastructure spending be invested in projects that meet the strongest resilience standards and ensure that jobs are filled primarily by local hires in underemployed communities.<sup>5</sup> In addition, the Administration should also employ the U.S. Department of Transportation Maritime Administration grant programs and EPA programs like the Diesel Emissions Reduction Act as avenues for increasing port resilience and lowering greenhouse gas impacts of port infrastructure. Given recent impacts on the global supply chain from the Suez Canal blockage, the importance of port resilience is paramount. Recent commitments by the Biden-Harris administration to the Port Infrastructure Development Bank are a welcome step. Resources should be prioritized based on need and leverage existing unfunded or underfunded planned and community-supported projects.

### **5) Expand and increase the flexibility of FEMA and HUD mitigation programs**

Congress authorized the FEMA Building Resilient Infrastructure and Communities (BRIC) grant program as a 6% set aside from estimated disaster grant expenditures incurred throughout the fiscal year. The program has only offered up to \$500 million in grants in the past year despite receiving more than three billion in applications. By some estimates, the program could provide \$3.7 billion in grants for this year based on 2020 disasters. This is the biggest opportunity to provide pre-disaster dollars to FEMA grant programs. By using the BRIC program to its fullest intended extent, expanding other hazard mitigation grant programs, and amending them to better serve and prioritize low-income communities (including eligibility for planning and capacity-building), the federal government could significantly increase proactive risk reduction.<sup>6</sup> The Administration should also seek to invest in HUD programs not only as a one-time stimulus but expand funding for regular repairs and especially improvements to public housing.

### **6) Fund community organizations involved in disaster preparedness and recovery**

Many community and volunteer organizations active in disaster and mutual aid groups were launched following disasters across the country and have continued to provide critical support during the Covid-19 crisis. These groups educate, organize, prepare and respond to disasters, are embedded within communities, and can often more quickly mobilize than government agencies. The federal government can build community

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<sup>5</sup> America's Transportation Infrastructure Act of 2019 and the Senate-proposed Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) grant program provide potential avenues for integrating natural and nature-based resilience investments to accompany transportation and other infrastructure projects.

<sup>6</sup> As one example of such approaches, Dr. Carolyn Kousky, Executive Director of the Wharton Risk Center, proposed increasing funding specifically for community-based planning technical support, and enabling funding to go toward public-private partnerships to provide parametric microinsurance for lower-income households, to provide fast and flexible funding post-disaster (2020).

resilience, preparedness, and prevention from the ground up by establishing easy-to-apply grants for these types of organizations.

**7) Develop resources to support long-term migration away from areas with significant flood risk**

The Administration should proactively develop better options for long-term migration. FEMA should work to establish a clear federal program to assist states, localities, and communities to transition in areas of highest risk. Funding and research to support public engagement in identification of options for long-term managed relocation is critical. It is also recommended that FEMA explore pilot programs to support innovation, such as a “discounts for buyouts” program for repetitive loss properties and areas expected to be inundated by the end of the century that would offer homeowners discounts on their flood insurance premiums now, in exchange for a commitment to accept a future buyout at an agreed-upon triggering event.<sup>7</sup>

**EQUITABLE & JUST: Prioritize frontline communities.**

**8) Prioritize historically disinvested communities in all programs**

The Biden-Harris Administration, via an interagency resilience working group, should review and reform cost-benefit analyses and prioritization considerations across all funding sources. The set-aside for disadvantaged communities in the American Jobs Plan is a great start, but the federal government should make such commitments to equity and prioritization of frontline communities across all programs. Among other inequities in federal programs, it has been demonstrated that federal disaster aid favors whiter and wealthier communities.<sup>8</sup> One reason is that risk management and mitigation programs within FEMA and USACE use property values as the primary factor in cost-benefit analyses. The funding programs within federal agencies, the implementation guidance inclusions that direct them, and reforms to the Office of Management and Budget are needed. Specifically, the needs and values of frontline communities and a wider range of contextual factors should be considered to drive toward more equitable investments. These may include density, replacement value, and health benefits. As part of the proposed infrastructure package, revolving loan programs, or other means, the Administration should also increase assistance for low-income families to access technical assistance, counseling, and low or no-cost retrofits.

**9) Reform the National Flood Insurance Program and increase access to insurance**

The Administration should develop affordability provisions for renters and owners that need them and expand products to address multiple hazards simultaneously. This can and should be done while simultaneously realizing risk-based ratings as has been proposed through ***Risk-Rating 2.0: Equity in Action***. Further, the Administration should expand coverage through increased applicability of guidance for multi-family buildings and attached homes and develop new products that close coverage gaps and incentivize mitigation. And finally, forgive the program’s current debt.

**GREEN: Nature is a primary part of the solution**

**10) Work with nature**

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<sup>7</sup> Adler, D; M Burger; R Moore; J Scata. 2019. Changing the National Flood Insurance Program for a Changing Climate. Environmental Law Institute, Washington, DC. <http://www.eli.org>.

<sup>8</sup> NPR. March 5, 2019. How Federal Disaster Money Favors the Rich.

Congress and the Biden-Harris Administration have already made strides to prioritize natural and nature-based features in legislation and policy. This can be taken one step further by ensuring that the implementation guidance for agencies such as the USACE clearly details how these priorities should be implemented. Additionally, increasing investments in nature can be accomplished through grant programs administered by the National Fish and Wildlife Foundation (National Coastal Resilience Fund), Fish and Wildlife Service (North American Wetlands Conservation Act), EPA green infrastructure grants, and authorized but unfunded USACE ecosystem restoration projects. And finally, the Administration should establish a national floodplain restoration grant program that connects buyout funding with habitat restoration funds as well as community support and counseling services is needed. This could be accomplished through integration of programs and funding opportunities across multiple agencies (FEMA, NOAA, USACE, EPA, HUD).

### **TRANSPARENT: Clearly communicate risks and recovery options**

#### **11) Disclose flood risk**

Pursue a nationwide flood risk disclosure policy for prospective tenants and buyers. Flood risk is our nation's most common disaster. Knowing the level of one's risk helps change patterns of behavior related to flood insurance, increasing uptake of up to 15 percent or more.<sup>9</sup> Further, three quarters of Americans support a national requirement that home sellers inform potential buyers if a property has flooded repeatedly. This support holds across party lines and inland and coastal communities.<sup>10</sup>

#### **12) Establish a federal dashboard for recovery**

Develop a dashboard for disaster recovery to help navigate victims through the aid process and develop a single application for victims to apply, allowing some flexibility for tailoring requirements to the local context.<sup>11</sup>

In conclusion, we believe our country has this opportunity to prepare for a future impacted by climate change and resilient to its challenges. We believe this is a critical moment for the Administration to embrace opportunities that exist within current programs and leverage this opportunity that will be achievable in shorter time frames.

Thank you for the opportunity to provide these recommendations. Please feel free to reach out to Kate Boicourt, Director of Resilience, Waterfront Alliance and campaign director for the Rise to Resilience coalition, [kboicourt@waterfrontalliance.org](mailto:kboicourt@waterfrontalliance.org), with any questions.

Signed,

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<sup>9</sup> SSRS Research. 2019. Pew Charitable Trusts Flood Policy Survey.

<sup>10</sup> [Pew Flood Insurance Survey](#). 2019. SSRS Omnibus and Pew.

<sup>11</sup> Kousky, 2020.

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