



American Planning Association

Creating Great Communities for All

Stakeholder Perspectives: Building Resilient Communities

**U.S. House Appropriations Subcommittee on
Transportation and Housing and Urban Development
U.S. House of Representatives**

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On behalf of the American Planning Association**

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On behalf of the American Planning Association (APA), thank you Chairman Price, Ranking Member Diaz-Balart and members of the Subcommittee for holding this hearing on a subject so vital to the future health and prosperity of our nation's communities. I want to also thank Rep. Clark who represents my district and the Town of Arlington for her support and leadership.

I am Jennifer Raitt. I direct planning and community development activities for the Town of Arlington, Massachusetts. Arlington is a vibrant, walkable town of approximately 45,000 people with good schools and green space in close proximity to Cambridge and Boston. Our town is part of the Inner Core which includes 20 municipalities in and around Boston that work regionally on critical issues that cross municipal boundaries. Working together increases opportunities to leverage funding, share best practices, and strengthens our collective voice and overall advocacy. Prior to my work for the Town, I served the Metropolitan Area Planning Council, the regional planning agency for Metropolitan Boston, for nine years as their Chief Housing Planner and Assistant Director of Land Use Planning. From that experience I developed deep appreciation for local work while understanding that a strong

regional agency can sharpen a regional vision and encourage multi-disciplinary work from municipal and state finance and policy to housing policy and transportation policy. I have also been active in setting policy for planning across the nation through my work for APA. I serve on the APA Legislative and Policy Committee. I co-authored APA's policy guide on hazard mitigation, and I am currently leading a new policy initiative aimed at addressing the nation's housing crisis through better planning. I am honored to be with you this morning.

Today's hearing and topic could not be more timely or urgent. Recent years and months have repeatedly demonstrated the enormous and critical challenge we face to improve the resiliency of our cities, towns and communities in the face of natural hazards, extreme weather, and a changing climate. As we have seen with recent hurricanes, wildfires, tornadoes and other disasters, the threat to people, property and our national prosperity is too great not to seek to improve how we plan and how federal programs can better support and improve those planning efforts.

APA and planners across the country are committed to creating just, healthy, and prosperous communities that expand opportunity for all. Central to that vision is the need to promote safer and more resilient communities through a combination of good planning and strategic investments. Planning and capital infrastructure investments should work together as a partnership that uses near-term project funding to achieve a long-term, locally crafted vision that increases resiliency, rather than reduces it. Today's hearing is a chance to explore how federal policy and funding can support and advance this approach.

APA has a track record of advancing the state of planning for resilience through the Hazards Planning Research Center. With original and applied research, the Center identifies practices that protect communities from natural and man-made hazards and educates planners and allied professionals about those practices. The Center's mission

is to support the development of safe communities that can minimize losses from disasters while efficiently using resources to foster long-term resiliency.

Moving Toward a Resiliency Planning Model

True resiliency policy is comprehensive and does not seek simply to harden infrastructure or rebuild following disaster but aims to address physical, social and economic systems together to strengthen the whole community. Every community should plan for resiliency beyond a narrow focus on disasters. My planning colleagues in the city of Norfolk, Virginia define resiliency this way: “Resilience is the capacity of individuals, communities and systems to survive, adapt and grow in the face of stresses and shocks and even transform when conditions require it.” This broad reach of resiliency makes it particularly appropriate for a discussion of housing and transportation investments.

Community resilience is a mosaic comprised of mitigation, adaptation, response, and recovery. Hazard mitigation comprises a series of actions that lessen the severity or intensity of the hazard when it strikes. Adaptation entails modifying the environment or structure to make it more suited to changing conditions. Response and recovery refer to the effort after an event to return to or restore to the previous condition and in many cases to produce a better state. All of these are necessary components of resilience and a plan that focuses on one to the exclusion of the others will not support true resiliency.

Traditionally, most hazard planning has focused on operations, emergency response, and mitigation. By ignoring adaptation strategies and failing to plan for response and recovery, this strategy leaves communities vulnerable to even greater risk and costs, and thus less resilient. The Gulf Coast has learned this lesson repeatedly in recent decades; rebuilding coastal communities following hurricane events only to be forced to rebuild them again following subsequent storms.

In most cases, evacuation, emergency response, mitigation and recovery plans were either not in place or were inadequate. The affected communities may have thought they were prepared; however, that preparation could not overcome the force of these storms. Decades of land-use and infrastructure construction decisions that often did not focus on resilience weren't able to bounce back successfully from a disaster could not cope with the wind and water these storms brought with them. This failure to prepare has led the communities affected by these storms to begin thinking about adaptation in the face of threats, rather than just mitigating their impact. While it is good that the thought process has begun, for the most part the mindset continues to be to rebuild in place.

Hazard events are becoming less predictable and more extreme requiring deeper analysis and greater planning. It is no longer acceptable to simply deal with the situation when it occurs.

Appropriate resiliency planning demands that we ask and answer two key questions: How do we adapt to reoccurring events? How do we recover better, stronger and more resilient from events so that the next and subsequent events are less disruptive and damaging? The answers to these questions in a local or regional context should inform how federal infrastructure, housing and community development investments are made.

Federal policy has tended to emphasize hazard mitigation or disaster recovery. These areas are critically important. However, the core federal infrastructure programs, most particularly those at the U.S. Department of Transportation and the U.S. Department of Housing and Urban Development have the potential to directly support local efforts at systemic resiliency. Federal investments should focus on the idea of providing "co-benefits" where every dollar invested produces multiple benefits, so we avoid, wherever possible, single-purpose investments and projects that make communities more vulnerable in the long-term.

Communities are increasingly focused on resiliency planning. Across the country we are seeing a growing focus on taking a planning approach that is broader than a stand-alone mitigation plan or a separate strategy for post-disaster recovery. As important as those plans are, it is the linkage of those ideas to comprehensive plans, land use regulations, capital infrastructure budgets that are leading toward true resiliency.

APA supports an 'equity in all policies' approach to genuine resiliency. Policies that improve the exchange of information about community risk, empower people through community-based participatory planning, support targeted funding of identified adaptation and mitigation projects, and include equity as a consideration in Benefit-Cost analyses are all important features of effective resiliency planning.

Examples of major new resiliency plans that aim to take a comprehensive approach to housing, transportation and development policy include [award-winning efforts in New Orleans](#) to tackle planning for and living with water and the [Resilience Program of the Association of Bay Area Governments](#) (ABAG) in California. The ABAG program provides a specific focus on housing vulnerability that local government can use to guide planning, zoning and capital investment decisions.

APA has [surveyed legislation](#) from all 50 states for laws that are intended to require, promote, or encourage local mitigation of natural hazards. These surveys place an emphasis on the intersection of hazard mitigation and land use in state legislation, and the role



of the states in guiding local hazards policy.

Thirty-three states require communities to adopt a local comprehensive plan. Twelve states now require that these plans address resiliency and planning for natural hazards.

I have been part of efforts in Arlington and across the Greater Boston area to work collaboratively through a regional partnership to address resiliency issues. In 2015, the Metro Mayor's Coalition (MMC) formed the Climate Preparedness Taskforce in order to better facilitate coordination among the 15 municipalities of Metro Mayors Coalition and Massachusetts state agencies, and regional and Federal agencies. The participating cities make up over 1.4 million constituents, nearly 20% of the Commonwealth's population. These municipalities share risks and vulnerabilities because of the region's shared resources and many forms of transboundary infrastructure and systems that provide critical services.

During the past four years, the Taskforce has worked to advance the commitments made by the MMC and continues to make progress to increase municipal capacity to assess and address climate vulnerabilities, bolster regional coordination, and enhance awareness on the resilience of critical infrastructure. The Taskforce has also worked on ensuring that climate data for flooding and extreme heat is consistent and shared across the region. Fourteen out of 15 of the MMC municipalities have performed climate vulnerability assessments either through MAPC's technical assistance, participation in the Massachusetts Municipal Vulnerability Preparedness (MVP) program, or local processes.

Regional collaborations such as the MMC Climate Preparedness Taskforce are an important model, because they help strengthen regional and state relationships, build capacity, and identify priority actions. As the Taskforce continues to work on these issues and attempts to amplify the impact at the regional level, funding and support

from State and Federal agencies is more critical than ever. This includes dedicated coordination efforts from State and Federal agencies, as well as grant and financing opportunities to enhance resilience of critical municipally and state-owned infrastructure. Funding allocated to a regional collaborative like the MMC working on climate resiliency and mitigation could help address multiple issues in a more cohesive and strategic manner throughout the Boston region.

In Massachusetts, the state has been providing planning grant funds for communities to engage in municipal vulnerability preparedness planning. These community resilience planning processes help municipalities alone and regionally to address the impacts of climate change. Arlington received one of these grants which allowed us to examine strengths and vulnerabilities, as well as identify priority resilience-building actions.

At the core of Arlington's planning process was a Community Resilience Building Workshop, which involved stakeholders representing a broad-cross section of the community in an intensive 8-hour forum designed to assess local vulnerabilities to hazardous weather events and develop action steps for addressing them. The top priority identified through the workshop was to address stormwater overflow of a brook, which has recently and historically caused significant damage to homes, businesses, and other properties in the vicinity of the brook. The Town then leveraged this planning process and received a grant from the state to develop and implement ecologically sensitive flood management measures along the Mill Brook Corridor. The effort is a public private partnership aimed at improving public access and recreational opportunities.

Both the planning and action grants illustrate the importance of local planning and a local demonstration effort that seeks to both address and mitigate the effects of climate change, flooding in Arlington's case, and raise the profile of the need to tailor future land use policy to protect critical community infrastructure.

Federal Role

The funding for programs under the jurisdiction of this Subcommittee is among the most important and proven federal resources for communities. I want to thank you for your long-standing support for critical tools like Community Development Block Grants (CDBG), HOME, Choice Neighborhoods, TIGER/BUILD, transit capital grants, and the range of surface transportation programs.

APA is proud to support continued funding for these essential programs. As this Subcommittee begins work on FY2020 funding, we urge you to reject the Administration's proposal to slash funding for these programs and to boost the resources available to continue advancing resiliency and expanding opportunity in the nation's communities.

Eliminating funding for CDBG and HOME would do significant damage to not only housing affordability and community development but also broader resiliency efforts. It is the wrong approach, and Congress should again reject it.

Specifically, APA supports \$3.8 billion in FY2020 for CDBG. The CDBG program remains the principal source of federal revenue for states and localities and their program partners to use in developing and implementing community development solutions for creating and sustaining healthy, functioning communities. For every \$1.00 of CDBG investment, another \$4.09 in private and public dollars is leveraged. This impact is only increased when combined with local resiliency plans.

I would also urge the Subcommittee to continue its support for other core community infrastructure programs at HUD and DOT, including HOME, the Choice Neighborhoods Initiative, BUILD grants, and Transit Capital Investment Grants.

More and Better

We strongly believe that well-planned infrastructure projects strengthen communities, boost the economy, and expand opportunity. They also promote a return on the public investment, in contrast with unplanned infrastructure that can waste public funds, damage communities and the environment, and otherwise lead to inefficient growth. These investments can be, and should be, driven by policies and plans that create the foundation for a more resilient community.

While we are proud to advocate for more federal resources for critical housing and transportation needs, we also acknowledge that the nation needs both more and better investments. Looking across the country and the globe we see that the cities and regions that are thriving are those investing in critical infrastructure that connect people to economic and social opportunity while building a more resilient future. At the same time, we know that a poorly designed infrastructure funding can inhibit the shared prosperity, economic growth, and community development that we all seek. In this area of policy, details matter as much as funding.

Legislation enacted in the last Congress made important changes to the Stafford Act and how federal policy approaches hazard mitigation and disaster recovery. Addressing the important role of supporting modernized building codes, improving pre-disaster mitigation grants, and acknowledging the need to rebuild in a fashion that makes places more resilient in the future were key advances.

Future funding for HUD and DOT research and technical assistance efforts should support this work by helping better catalogue and understand resiliency planning for housing and transportation, providing essential data for local planning, and training for improved integration with hazard and resiliency efforts. For example, HUD's Office of Policy Development and Research could play an important role in improving the integration of HUD funding with local resiliency efforts and understanding the

application of comprehensive resiliency strategies to federally subsidized housing and community development efforts.

Federal Reforms

One of the reasons support for programs like CDBG and HOME has been strong on both sides of the aisle on Capitol Hill is the flexibility these programs offer local communities. This flexibility is important in advancing and implementing the vision in local plans. However, these essential investments can also be a vital part of achieving the goal of advancing resiliency. There are opportunities to use program criteria, incentives, and planning to ensure limited federal resources are investing in a safer and more resilient future. Improved planning and expanded criteria emphasizing integration and co-benefits can boost the impact key DOT and HUD programs make.

A straightforward opportunity to improve the linkage of DOT and HUD programs with local resiliency efforts is the explicit inclusion of a resiliency criterion in the evaluation process for key discretionary grant programs. Programs like HUD's Choice Neighborhoods and DOT's BUILD are already in high demand. Encouraging the multiple economic and social benefits of resiliency in evaluating proposed projects ensures the highest return for taxpayer investment without compromising local vision and flexibility.

A prime example of how this could work can be found in Norfolk, Virginia where officials are using HUD-funded Natural Disaster Resiliency Competition grant to develop coastal resilience for a historic owner-occupied African-American community and adjacent public housing project in a way that also provides community benefits (access, transportation, recreation, landscaping and utility upgrades) while stabilizing home values.

Reforms to the Clean Water State Revolving Loan Fund administered by the U.S. Environmental Protection Agency recent adopted set aside funding for green

infrastructure. This funding helps strengthen the connection of the infrastructure funds to local resiliency efforts. It is an approach that could be adapted for use with other federal infrastructure financing tools.

The planning process already embedded in many core HUD and DOT programs also offers opportunity for improving the linkage to resiliency. CDBG recipients are already required to complete Consolidated Plans and related assessments. Encouraging the incorporation of resiliency considerations in these plans and evaluating the consistency of Consolidated Plans with local resiliency or hazard mitigation plans would help ensure funding supports long-term resiliency efforts.

Further, DOT maintains a separate planning requirement for States and Metropolitan Planning Organizations. These plans are sometimes disconnected from the HUD planning process and requirements. Resiliency is an element that should be common in both approaches and could be one basis for closer integration of housing and transportation projects.

HUD's Choice Neighborhoods Initiative provides funding for preliminary planning that precedes the major capital transformation grants. Requiring an evaluation of resiliency as part of this HUD-funded planning process would significantly improve these plans. This would offer benefits even in communities not selected to receive capital grants initially. Further, as noted above, Choice Neighborhood capital grant proposals should be partially evaluated on resiliency criteria as well.

Although it is outside the jurisdiction of this Subcommittee, the looming and long-delayed reauthorization of the National Flood Insurance Program is an important opportunity for federal policy to better align with local resiliency efforts and support tools needed for better planning.

CDBG-Disaster Recovery

Additionally, DOT and HUD are critical partners for communities after disaster has hit. For example, a significant proportion of federal disaster recovery assistance is administered through CDBG-DR. Improving the operation of CDBG-DR by expanding its resiliency focus, can make a major impact on ensuring that communities rebuild in a way that minimizes future losses of life and property.

Congress should standardize coordination between HUD's Action Plan and FEMA's Hazard Mitigation Plan. Under the National Disaster Recovery Framework¹, FEMA is the primary coordinating agency of all recovery support functions. FEMA's national Mitigation Planning Program is currently working with HUD officials to determine how to link the CDBG-DR Action Plan with the [Hazard Mitigation Plans](#) (HMPs). The requirements for the Action Plan and HPM are different. While HMPs are pre-disaster plans, they must be updated every five years to reflect progress made in risk reduction. Closer coordination of these planning requirements will help ensure that CDBG-DR funding supports future resiliency.

CDBG-DR could also be improved by establishing through HUD's Community Planning Development office a central point for training on disaster response and recovery, local and regional land use planning, hazard mitigation planning and related best practices to HUD regional and field offices. Previous legislative proposals have suggested creating an Office of Disaster Recovery & Resilient Communities at HUD. This idea has merit, but some of the same objectives can be advanced with the scope of the appropriations process.

CDBG-DR can also be used to provide incentives for pre-disaster resiliency planning in much the same manner as FEMA recovery funding. CDBG-DR could fund the creation

¹ Provide a structure to facilitate problem solving, improve access to resources, and foster coordination among State and Federal agencies, nongovernmental partners and stakeholders. Each Recovery Support Function has coordinating and primary Federal agencies and supporting organizations that operate together with local, State and Tribal government officials, nongovernmental organizations (NGOs) and private sector partners. The Recovery Support Function coordinated by FEMA is [Community Planning Capacity Building](#).

of pre-disaster recovery plans that include how they will be integrated with the Hazard Mitigation Plan, therefore become true pre-disaster resilience plans. HUD funding is not typically used for planning post-disaster. States drive where funding sources are used and often don't coordinate well with local governments. Once funding is received by states, they decide how it will be spent. Typically, planning is not included. APA recommends providing financial incentives for local planning so that local governments spend CDBG-DR (and HMGP) funds aligned with local plans. The recovery plan can integrate resilience during the post-disaster period.

CDBG-DR funds can also be used to effectively advance critical housing strategies in the post-disaster recovery period. There is a growing recognition that federal disaster recovery funds should not be used simply to build back to the status quo ante but rather to build back in a more resilient way. Often communities have housing plans, strategies and regulations in place to advance innovative approaches.

The rebuilding process is an opportunity to accelerate those approaches. A prime example would be allowing the use of post-disaster funding for the development of accessory dwelling units (ADUs) in communities where local regulations permit this development. This would allow communities to not only replace damaged housing but also use the rebuilding process to implement a strategy aimed at addressing a range of housing challenges from affordability to aging in place.

There is also an important social equity consideration in the funding of projects identified by community-based recovery and resiliency plans. It is important to increasingly target disaster recovery funds at mitigation efforts that incorporate equity thinking into Community Development Block Grant-DR funding appropriations and poverty eradication efforts for disaster-affected households that may be experiencing repetitive losses.

States also have a role. In response to 2013 severe flooding, the State of Colorado's Chief Recovery Officer and the Colorado Resiliency and Recovery Office coordinated the support of multiple State agencies and partners to aid counties and communities with a series of planning, management, and community involvement efforts. Colorado used CDBG-DR to provide assistance on management, planning, community development, and technical assistance. States can consider using existing programs and agencies to assist local governments after a disaster.

Conclusion

Communities across the country are focusing on minimizing and avoiding damage from natural disasters. Resilience and mitigation have become essential elements of local planning for infrastructure development. Federal investments in infrastructure and community development should support efforts to advance hazard resilience and design safer neighborhoods that meet the needs of all users. Safer communities will protect the investment and produce better projects and benefits. However, resilience is more than preparing for disasters. Resilience includes adaptation to changing economic and social structures and physical conditions for which investments in supportive infrastructure can be beneficial and cost effective.

The status quo is no longer acceptable. Planners have a significant and direct role in planning for community resilience. Appropriate change in land-uses, densities, development techniques, building codes, utility locations and installation methods, infrastructure investments, and similar considerations are what planners are trained to bring to the forefront of community discussions about how to prepare for and respond to changing conditions.

While resiliency strategies and plans will be crafted and implemented locally, there is an essential partnership between local communities and the federal government. Improving the coordination of federal investments with local resiliency plans will

heighten the impact of these efforts while avoiding waste, inefficiency and compounding future losses from natural disasters.

Thank you for the opportunity to testify. I look forward to your questions.