



**Re: Request for Information for HUD's Community Development Block Grant Disaster Recovery (CDBG-DR) Rules, Waivers, and Alternative Requirements**

**Docket No. FR-6336-N-01**

**Introduction**

The State of Colorado's Division of Local Government houses the Disaster Recovery Unit and the Colorado Resiliency Office. The Division is currently closing out Grant B-13-DS-08-0001 from the floods and wildfires of 2012 and 2013 and is in the process of implementing B-21-DF-08-0001 from the Marshall Fire, which occurred in December of 2021. These comments are largely based on the Colorado experience. However, Colorado actively coordinates with other state's and shares ideas and experiences through the disaster recovery committee of the Council of State Community Development Agencies (COSFDA). Colorado contributed to the COSFDA response, so this response will be limited to emphasizing or expanding on concerns specific to our State. We greatly appreciate the opportunity to provide comment and HUD's efforts in soliciting input for the purposes of program improvement and a more fair and equitable distribution of limited disaster resources.

**General Comments**

The biggest impediment to the use of CDBG-DR funds for disaster recovery is the time it takes from disaster to program implementation. While local governments focused on longer term infrastructure reconstruction can weather these longer timeframes, individual households and businesses that are on the margins cannot wait the 18 month and longer associated with CDBG-DR. This results in those most in need unable to access assistance. Most of the responses below will be in the spirit of reducing the time to implementation or simplifying, where possible, burdensome requirements. We acknowledge and appreciate the progress HUD has already made over the years in this area, and these comments are in the spirit of further improvements to the benefit of our impacted citizens and communities.

In areas such as equity and inclusion and resilient rebuilding, this is a strong priority for Colorado from the Governor's office to local communities. To the extent that HUD can provide tools and technical assistance, grantees would find this of great value. However, HUD also needs to be cognizant that all disasters are different and impact different populations in different ways. The addition of more rules and regulations in this area will add additional complications and could have unintended consequences by trying to impose 'one-size-fits-all' rules to disasters that vary greatly in scope and impacts.

## 1. Reducing Administrative Burden and Accelerating Recovery.

a) Are there CDBG–DR rules, waivers, or alternative requirements that are unnecessarily complicated?

- Lack of data and the recent complications of data sharing processes is a major impediment. HUD, FEMA and SBA should work together to establish a single multi-agency data sharing agreement that States can sign on to. Release of Information clauses within the various programs could provide additional legal cover and reduce risk.
- The one year restriction on pre-application costs for beneficiaries is unnecessary and unreasonable, especially given that it can take years to complete a reconstruction project and CDBG-DR funds are typically not available within the first year. This rule just creates and arbitrary, artificial window of time where costs are ineligible that is very frustrating to the household. This restriction can be removed without harm to the program.

b) Are there CDBG–DR rules, waivers, or alternative requirements that could be streamlined or removed to enable grantees to accelerate recovery?

- Streamline the certification process and provide clear guidance and best practices to new grantees in the form of sample certifications.
- The Action Plan process is too complicated and too lengthy. Improvements have been made, but a more simplified and standardized form that ties unmet needs to eligible programs would streamline the process. Reduce the HUD review time.
- There is no need for a protracted action plan process for those electing early release of administrative funding. Allow the grantees to opt in to advanced funding for administration without going through an action plan process.
- In housing centered disasters, allow for an accelerated distribution of housing recovery dollars for repair and rehabilitation similar to the exception provided for administrative funds.
- Reduce the time required for public comment (14 days is sufficient).

c) Are there CDBG–DR rules, waivers, or alternative requirements that can be modified, expanded, or removed to reduce administrative burden for beneficiaries?

Yes. See response above regarding pre-agreement costs.

d) Are there CDBG–DR rules, waivers, or alternative requirements that could be streamlined or removed to accelerate recovery for grantees receiving smaller awards, or grantees that are funding primarily small and rural communities? For example, in a **Federal Register** notice published on May 24, 2022, HUD identified any grant under \$20,000,000 as a smaller grant award. Going forward, is \$20,000,000 an appropriate threshold?

Colorado concurs with the COSCDA response. More flexibility is needed and grantees should be setting the priorities of unfunded disaster needs rather than HUD dictating affordable housing. Additionally, the 5% administrative restriction is particularly challenging with small grants. This should be increased. HUD could also look to reduce administrative requirements as these smaller grants pose less risk.

e) Should there be a minimum allocation threshold for CDBG–DR grant awards? If so, what should the minimum allocation threshold be or be based on?

No minimum threshold should be applied. Rather HUD should streamline processes for small grants. What may seem a small amount compared to large scale disasters could be

incredibly impactful for a small community with a high concentration of damage.

f) Recent appropriations allow grantees to access funding for program administrative costs prior to the Secretary's certification of financial controls and procurement processes and adequate procedures for proper grant management. Grantees have used these administrative funds primarily for the development of the action plan (e.g., procuring contractors, increasing capacity, facilitating public participation, etc.). Aside from creating the action plan for program administrative costs, are there other approaches that HUD should consider to promote proactive coordination with other disaster response agencies before a CDBG-DR grant is executed?

Improve coordination of data sharing to provide grantees access to data to inform action plans in advance of allocations. This should be part of that initial coordination included in the tasks to be accomplished between the Federal Coordinating Officer and the State Coordinating Officer of a declared disaster. As part of the data sharing agreement, states can validate their security protocols and identify which state agencies need access to the data, including the community development entities that typically administer CDBG-DR. HUD could be the conduit for a common data set as they already have the data. The prohibition against data matching is unclear and unproductive. Instead, there should be a prohibition against certain enforcement activities, but these data must be matched with each other, damage assessment data and potentially case management data in order to fulfill their intended purpose of identifying needs and preventing duplication of benefits.

The process of writing a separate action plan for administrative costs is unnecessary. The available funds and their eligible uses are clearly defined (with the planning exception noted above) and should be available upon request.

In disasters with significant impacts on residential properties, HUD should strongly consider a preliminary allocation that can be used to establish a housing reconstruction and rehabilitation program that can stand up quickly. The slow pace of available rebuilding sources, especially for households on the financial margin, is consistently the biggest detriment to recovery at the household level.

g) Are there any activities that are currently ineligible in CDBG and are either not funded by other disaster recovery agencies or not fully funded, but that are so critical to meeting recovery-related needs that it may be important to permit them through an alternative requirement to advance a more resilient and equitable recovery?

The current prohibition against private utilities is unnecessary and can hinder recovery. There are private utilities and small electric coops that provide critical water or energy infrastructure to impacted communities. The inability to assist these utilities merely because they are not publicly owned hinders the impacted households that they serve. The only way these private utilities can recover is to pass those costs on to their customers, who are already reeling from their own costs to repair.

Disaster Case Management for housing is typically provided as an eligible project delivery cost for a housing reconstruction and rehabilitation program. Making this available as a stand-alone activity could accelerate contact with direct beneficiaries and provide that initial pipeline of applicants for rebuilding. This should include financial counseling and legal services as households attempt to assess their ability to return and rebuild.

h) Are there CDBG-DR rules, waivers, or alternative requirements that should be revised to better align with federal disaster relief programs implemented by the Federal

Emergency Management Agency (FEMA), the U.S. Small Business Administration, the U.S. Army Corps of Engineers, or other Federal agencies? Are there CDBG–DR rules, waivers, or alternative requirements that should be adopted by other Federal disaster recovery agencies?

HUD has made significant progress in this area by allowing the adoption of FEMA environmental reviews. HUD could go further by reducing requirements on any project where CDBG–DR is used as match. Provided the primary source is from another federal program (i.e. FEMA PA, USACE, NCRS, etc.), CDBG–DR should be able to match those funds provided it meets the requirements of the primary federal funding source.

Are there CDBG–DR rules, waivers, or alternative requirements that should be adopted by other Federal disaster recovery agencies?

The SBA should offer a business grant program for impacted businesses that create or retain LMI jobs or serve LMI communities that may not otherwise qualify for a loan. With the current process, those businesses on the margin have to struggle for another 18 months or more and re-apply for another federal program.

i) The Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121–5207) (Stafford Act) and CDBG–DR appropriations acts require HUD and its grantees to coordinate with other Federal agencies that provide disaster assistance to prevent the duplication of benefits (DOB). How can HUD and other Federal agencies that provide disaster assistance make it easier to comply with DOB requirements?

HUD in coordination with the SBA should permanently adopt the allowance provided through the DRRRA that acknowledges the difference between grant funding and a loan. DRRRA acknowledgement that debt is not duplication is helpful to beneficiaries.

Current HUD guidance is further burdensome in asking providers of rebuilding assistance to annotate all forms of assistance and then subtract out sources that are *not* for rebuilding. This is unnecessary and creates additional documentation requirements for already stressed beneficiaries. Only those benefits that apply directly to the physical rebuilding should be collected, recorded and documented.

j) What data should grantees report to HUD to improve public transparency and to better allow evaluation of the use of CDBG–DR funds consistent with the principles of the Administration’s Justice40 initiative to increase federal support for disadvantaged communities (e.g., requiring grantees to report to HUD on the race and ethnicity of those who apply for assistance but are not ultimately served)? How might the administrative burden of reporting be reduced?

Currently, the outreach and supplemental services are far more important than measuring quotas, which often go unreported at the request of the beneficiary. HUD should ensure that appropriate tools, such as the CDC’s Social Vulnerability Index or the Just40 mapping tool are utilized in the planning and outreach processes. With those enhancements and the current focus on MIDs and LMI households, the current reporting schemes are likely sufficient

k) What types of technical assistance should HUD offer grantees to support a timely, equitable, resilient, and successful recovery? Are there phases of CDBG–DR grants (e.g., initial administrative work, action plan development, program implementation, etc.) where providing more intensive technical assistance would be more effective? What types of technical assistance should States offer local government subrecipients to support a timely,

equitable, resilient, and successful recovery?

HUD could do considerably more up front to support grantees, particularly new grantees, in standing up CDBG-DR grants. Critical time is lost trying to grapple with complex requirements while trying to staff up or conduct an RFP process for technical help. A HUD “strike team” that could come in and help with initial evaluation, needs assessment and program development would trim months off of the implementation timeline and reduce the likelihood of recapturing funds later. This could be done through a number of mechanisms including the temporary redeploying of HUD staff, encouraging the use of the Emergency Management Assistance Compact (EMAC), maintaining a contract to deploy contract staff as needed, and/or establishing a “Recovery Corps” of current or retired practitioners that can be called on to assist. Currently, new grantees are left to figure this out without adequate resources.

l) What types of technical assistance or other measures should HUD offer to better assist grantees in preventing and identifying potential contractor fraud and to strengthen the ability of grantees to assist beneficiaries when they are subject to contractor fraud?

m) What mitigation techniques or requirements could HUD employ to enhance grantee capacity to comprehensively assess the likelihood of potential fraud risk and to otherwise detect and prevent fraud in grantee programs?

## 2. Establishing Priorities

a. Should CDBG-DR rules, waivers, or alternative requirements be written to 1) encourage or require grantees to first address disaster recovery housing needs prior to other recovery needs (e.g., infrastructure), or 2) encourage or require grantees to invest in whole community recovery in proportion to its unmet recovery need (e.g., housing, infrastructure, economic revitalization, and mitigation)?

Additional rules or restrictions would only inhibit the grantees flexibility and potentially slow recovery. Grantees will seek to deploy funds where they are needed most, and HUD does not always have clear visibility on other resources grantees can bring to bear to address recovery issues. Current rules are sufficient.

b. If CDBG-DR should encourage grantees to invest in whole community recovery, what policy incentives would be most effective to encourage grantees to invest in whole community recovery in proportion to its unmet recovery need? N/A.

c. What CDBG-DR rules, waivers, or alternative requirements, if any, should be modified or eliminated so that grantees are prioritizing assistance to low- and moderate-income persons and areas, vulnerable populations, and underserved communities?

The single most important thing we can do to assist low and moderate income households, is to reduce the time from disaster to program implementation. The LMI households are the ones who typically do not have the capacity or financial reserves to wait 18 months and usually longer for HUD and the State to stand up assistance to return them to their homes or relocate. Additionally, provide maximum flexibility in duplication of benefit criteria for low income households. It is these households that are most likely to need to divert rebuilding assistance for basic needs. Affidavits should be sufficient rather than detailed collection of receipts.

d. How can HUD assist grantees in using data-driven information to better align their proposed recovery programs and activities with unmet recovery needs? (HUD is also seeking public comment on how it defines and determines unmet recovery needs in a



separate request for information. Please see the RFI requesting information on the CDBG–DR allocation formula published elsewhere in today’s **Federal Register**.) Response provided in the CDBG-DR Allocation RFI.

e. How can CDBG–DR rules, waivers, or alternative requirements be modified or eliminated to encourage greater levels of investment in infrastructure projects that provide the greatest benefit to impacted low- and moderate-income areas?

f. What CDBG–DR rules, waivers, or alternative requirements, if any, should be modified or eliminated so that grantees carry out activities to support economic revitalization for underserved and economically distressed communities?

See comments above regarding SBA providing grants. Also note that the time to implement the CDBG-DR grant program leaves most vulnerable businesses behind because they cannot stay afloat in the time it take so stand up a CDBG-DR grant program.

g. How can CDBG–DR rules, waivers, or alternative requirements be modified or eliminated to better address the unmet recovery and mitigation needs of affordable rental housing, public housing, and housing for vulnerable populations? Covered below in ‘Equity section’.

h. How can CDBG–DR rules, waivers, or alternative requirements be modified or eliminated to allow grantees to leverage private capital (*e.g.*, bridge loans) to start the long-term recovery process immediately after a disaster?

Explicitly allow the reimbursement of private bridge loans and/or public financing as eligible pre-agreement costs.

### **3. Understanding the Requirements for Most Impacted & Distressed (MID) Areas**

Currently, CDBG–DR appropriations acts require all funds to be used in a most impacted and distressed (MID) area resulting from a major disaster. Current rules attempt to balance requirements in the appropriations acts to make allocations to HUD-identified MID areas while also providing grantees with flexibility to capture additional areas that the grantee can determine is also a MID area, using data or information that is not available to HUD.

a. What CDBG–DR rules, waivers, or alternative requirements, if any, should be modified or eliminated to clarify the differences between the HUD-identified MID area and the grantee-identified MID area? See comments in CDBG-DR Allocation RFI. MID areas create another layer of complexity as projects can cross MID boundaries. This should be addressed in the written action plan, but we can eliminate establishing distinct MID activities in the DRGR.

b. Are there specific parameters, data, or other criteria that should be established by HUD for a disaster- impacted community to qualify as a grantee-identified MID Area? Please provide recommendations for specific parameters, criteria, or limitations that should be established. Concentration of damage of 20% or greater as measured by damaged homes divided by total homes. High concentrations impact local government ability to service impacted households.

c. Should HUD continue to allow for the use of CDBG–DR funds to benefit grantee-identified MID areas? How, if at all, should HUD adjust the requirements for the balance of

assistance between HUD-identified and grantee-identified MID areas? HUD should defer to the grantee on impacts based on grantee provided justification. HUD should adopt any MIDs identified and justified by the grantee rather than maintaining two sets of MIDs.

#### **4. Developing the Action Plan**

a. What CDBG–DR rules, waivers, or alternative requirements relating to the action plan, if any, should be modified or eliminated to capture unmet disaster recovery needs or mitigation needs more accurately? See response to CDBG-DR allocations methodology RFI.

b. HUD currently requires grantees to post an action plan for 30 days to solicit public comment and to host at least one public hearing—is this enough time to solicit meaningful public feedback? Should HUD consider increasing this time or the number of public hearings required for initial action plans and/or for later, substantial amendments to the action plan to achieve meaningful community engagement?

Absolutely not. HUD should consider decreasing the time. 14 days should be more than sufficient. Input will largely be received on the last couple of days regardless of whether 1 week or 6 months is provided. Only a small percentage of input is actionable. Most action plan changes occur due to lessons learned and reactions post implementation rather than via public comment, and these are handled by action plan amendments. Further delay will only harm impacted households and communities. The number of public hearing should be driven by the geography and demographics of the impacted area specific to each disaster, not driven by an arbitrary number. Grantees know their communities and are better equipped to make those judgements.

c. What enhancements should HUD consider to improve a grantee’s experience with the HUD’s Disaster Recovery Grant Reporting (DRGR) system and data reported by grantees, in particular the Public Action Plan module?

Historically, HUD has had access to damage data in advance of grantees and then asks the grantees to justify their impacts and investments in a lengthy document. Progress is being made with a more standard template, but this can be streamlined further. We could stand up programs much quicker if HUD could authorize a portion of the funding to address damages they already know exist (i.e. the need for housing rehab and reconstruction). This could be followed by a more prescriptive analysis and substantial amendment once the primary programs are up and running. Information should be limited to what HUD needs to justify the provision of funding in a given recovery area (i.e. housing, economic recovery or infrastructure).

#### **5. Advancing Equity**

a. What CDBG–DR rules, waivers, or alternative requirements, if any, should be modified or eliminated to ensure grantees equitably allocate resources and adequately address disaster-related needs of the most impacted, vulnerable, and underserved communities?

Incorporating Justice40 mapping, the CDC SoVI index or other analytical tools in the planning process is where this is best addressed. HUD could even assist by overlaying FEMA damage data with vulnerable communities.

b. What CDBG–DR rules, waivers, or alternative requirements, if any, should be modified or eliminated to ensure that grantees advance equity in the timing of who is able to receive assistance and the amount of assistance available and received? For example, by prioritizing

programs to assist homeowners over those that assist renters, a grantee may not have enough funding to meet the unmet needs of renters, including those less able to prepare for, respond to, and recover from the impacts of disasters.

Current CDBG-DR guidelines do not allow compensation programs, yet the biggest loss to renters is in personal property. The loss of rental structures is born by rental property owners. The fundamental challenge of serving renters is that they did not actually lose the residential asset. This leaves our options at providing temporary rental assistance, which is a cost they bore before the disaster. This can be justified in the case of displacement or job loss, but in some cases it is difficult to justify if other rental options exist. The bigger challenge is to incentive property owners to rebuild rental stock. We can do this through grants for rebuilding or even new construction, but the timeframes are long and landlords of smaller properties are often not willing to go through the process especially when it means they need to comply with an affordability period. It is less a function of not prioritizing renters and more a function of being able to quantify their actual losses, which are often picked up by voluntary organizations well before CDBG-DR ever becomes available. The flexibility to do new construction to build affordable rentals is greatly appreciated. However these projects take years to complete. In many cases households that rented will have already moved on to other housing options.

c. What CDBG-DR rules, waivers, or alternative requirements, if any, should be modified to further prevent an “unjustified discriminatory effect” (*i.e.*, interests can be served by another practice with a less discriminatory effect) based on race or other protected class in the implementation of CDBG-DR funding to address disaster-related unmet needs (recognizing that HUD has no authority to waive or specify alternative requirements for statutes and regulations related to fair housing, nondiscrimination, labor, or the environment)?

d. What barriers impede grantees’ ability to allocate resources equitably? What barriers do protected class groups, vulnerable populations, and other underserved communities face in accessing, applying for, and receiving CDBG-DR assistance in a timely manner?

As stated above, the biggest barrier is the time it takes to make resources available. By the time CDBG-DR funds are available, the most vulnerable have already fallen through the cracks. Disaster case management run as a public service in impacted communities in coordination with cultural brokers and local non-profits could assist in identifying impacted households in need of assistance earlier in the process. Often, finding these households before they are forced to leave the community is the biggest challenge.

e. What additional guidance, data, or support can HUD provide to help grantees comply with fair housing and civil rights requirements and allocate resources equitably across housing types?

As mentioned previously, overlaying vulnerable areas identified via established criteria (such as SoVI or Justice40) with FEMA data and GIS based damage assessments would be helpful and HUD is likely in a position to assist with these tools.

f. What challenges do grantees face in complying with their obligation to ensure meaningful access for programs, including incentives, to best serve protected class groups, vulnerable populations, and other underserved communities? What CDBG-DR rules and requirements, if any, should be modified or eliminated to ensure that grantees advance equity in their community-driven relocation activities?



Effective outreach to traditional underserved and ESL communities takes deliberation, time and resources. The ability to use planning dollars rather than limited administrative dollars would help resource these efforts. Currently, grantees tend to focus on this outreach at the Action Plan phase. Outreach and services to underserved communities need to be deliberate and go well beyond the initial Action Plan phase of the grant. Rules that encourage this ongoing outreach as eligible planning or public service activities would facilitate long-term collaboration in recovery for underserved communities.

## **6. Incorporating Mitigation and Resilience Planning**

a. Are there CDBG–DR rules, waivers, or alternative requirements, and/or policies that prevent or limit grantees’ focus on mitigating the impacts of climate change, particularly for those areas disproportionately impacted by climate change? If so, please describe.

The 15% mitigation requirement is appreciated provided that other recovery needs are sufficiently covered.

b. How can CDBG–DR’s rules, waivers, or alternative requirements or policies be modified or eliminated to encourage grantees to use CDBG–DR funds to invest in activities that incorporate resilience and mitigate the impacts of climate change?

Encourage planning and capacity grants to provide tools and best practices in resilient rebuilding. Avoid imposing requirements that may not align with permitting requirements, thereby creating additional layers of compliance. Colorado incorporates resilience criteria in competitive projects and encourages mitigation measures be incorporated as overmatch for FEMA PA funded projects.

c. What more can HUD do to encourage grantees to integrate long-term disaster recovery and mitigation planning into other existing federal, state, and local planning requirements? I think this is already being done by most states/grantees. The addition of mitigation resources has been helpful.

## **7. Replacing Disaster-damaged Housing Units, Minimizing Displacement, and Incentivizing Affordable Housing Development**

Should CDBG–DR notices continue to waive and provide alternative requirements for the one-for-one replacement housing requirements at section 104(d)(2)(A)(i) and (ii) and (d)(3) (42 U.S.C. 5304(d)(2)(A)(i) and (i) and (d)(3)) of the HCDA and 24 CFR 42.375 for disaster-damaged owner-occupied lower-income dwelling units that meet the grantee’s definition of “not suitable for rehabilitation?” To expedite recovery, HUD waives this requirement for disaster-damaged owner-occupied waivers and alternative requirements should HUD consider that would assist and expedite community efforts to reduce future risk while minimizing displacement and ensuring fair treatment and protections to those whose property is acquired or who must move due to a CDBG–DR funded activity? For example, recent CDBG–DR notices waive (and provide alternative requirements to) several provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601 *et seq.*) (URA), section 104(d) of the HCDA, and related CDBG programmatic requirements.

Yes, continue with waivers.

## **8. Modifying Green and Resilient Building Codes and Standards.**

a. Should the Department impose construction standards that require the use of CDBG–DR funds to adhere to current editions of the International Building Code (IBC), International Existing Building Code (IEBC), International Residential Code (IRC), International Wildland-Urban Interface Code (IWUIC), International Plumbing Code (IPC), International Mechanical Code (IMC), International Fuel Gas Code (IFGC), International Fire Code (IFC), ICC 500–14, ICC/NSSA Standard on the Design and Construction of Storm Shelters, and ICC 600–14 Standard for Residential Construction in High-wind Regions?

Green building codes should be removed as a requirement. While noble in purpose, these requirements may or may not align with local building codes. Even in progressive areas, local codes may not align perfectly with the requirements put forth in the consolidated notice. A beneficiary going through the construction process needs to build to current local code in order to get a permit. These requirements add another, often unnecessary, layer of compliance and inspections and assumes that the beneficiary knew of these requirements prior to planning construction and going to the local permitting office. This requirement could be acceptable for larger multi-family construction projects with longer development times, but make no sense and are unduly burdensome for individual households trying to build to established local standards. States/grantees still have the option of offering incentives to those who want to exceed local code standards through their program design.

Should HUD better align its building code requirements for CDBG–DR and CDBG–MIT with those required by FEMA or other Federal agencies? If so, how? Communication with federal partners is essential, especially where localities may be blending federal funding sources. Just as HUD has made improvements by aligning HUD elevation requirements with FEMA elevation requirements, this practice should be repeated as programs evolve. One change HUD could incorporate it to treat high velocity water hazards in mountainous areas with the same flexibility as high velocity water hazards in coastal areas. These inland restrictions can eliminate the use of CDBG-DR funding for certain infrastructure projects that by the nature of the communities they serve must pass over waterways. Align environmental review standards for coastal and inland risk areas in 22 CFR Part 55. While the policy typically doesn't allow development in many high-risk areas, exemptions do exist for developments in coastal areas; the same allowance is not permitted for inland, non-coastal floodways. Exemptions allowed for inland floodways can be important to driving investment in rebuilding homes and infrastructure for non-coastal floodways; specifically, HUD could revise §55.1(c)(1), eliminating the word "coastal" from the exceptions listed in §55.1(c), and modifying Table 1 in §55.11.

We greatly appreciate the opportunity to comment and will make staff available if further clarifications, discussions or ideas would be welcomed. Thank you for all you do to serve our impacted communities, and thank you for reaching out to practitioners at the grantee level as you work to improve processes and recovery outcomes for our citizens and communities.