July 18, 2016

Re: [Docket No. FR-5891-P-01] Modernizing HUD’S Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), we are pleased to offer the following comments in response to the proposed rule (FR-5891-P-01) entitled “Modernizing HUD’S Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards,” published in the Federal Register on May 18, 2016.

Formed in 1933, NAHRO represents over 20,000 individual and agency members, including public housing authorities, community development departments, and redevelopment agencies. In all, NAHRO’s members provide housing for more than 7.9 million low-income people and bring more than $1.5 billion Community Development Block Grant and HOME funding to their communities. NAHRO appreciates this opportunity to comment on this notice of proposed rulemaking and offers the following comments to the U.S. Department of Housing and Urban Development (“HUD”)

**Requiring broadband analysis in consolidated planning is disingenuous without additional support**

NAHRO strongly supports broadband access for all and accepts that the broadband access analysis required by this proposed rule could arguably exist within the realm of the Consolidated Plan’s goals. However, it is disingenuous for HUD to mandate this requirement without supplementary federal funding or support to state and local governments to address the findings of their broadband access analysis (e.g., funding for broadband infrastructure, affordable broadband services, internet literacy and devices). If the proposed rule were to pass into final rule, this unfunded mandate will only serve to become one more burden on the shoulders of every jurisdiction’s dwindling and belabored HUD CPD formula grants. These federal grants should be used by jurisdictions to expand the economic opportunities for low-income families, not for superficially addressing our nation’s deep-seeded infrastructure problems. Additionally, for small communities that depend on State funding, the addition of consolidated planning issues around non-crucial community development items that have unclear priorities would further burden the ability of communities and administrators to effectively allocate their HUD funds.

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**Stephen W. Merritt**, PHM, President; **Carl S. Richie, Jr.**, NCC, NAHRO Fellow, Senior Vice President; **Julie Brewen**, Vice President-International Research and Global Exchange; **Donna Brown-Rego**, Vice President-Member Services; **Donovan Duncan**, Vice President-Community Revitalization and Development; **Duane Hopkins**, Vice President-Professional Development; **Richard Leco**, PHM, Vice President-Commissioners; **Regina Mitchell**, SPHM, PHM, Vice President-Housing; **John F. Bohm**, Acting Chief Executive Officer.

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Requiring natural hazard risks analysis in consolidated planning is inappropriate

NAHRO is opposed to adding the concept of vulnerability to natural hazard risks to the Consolidated Plan. While it is absolutely a necessity for states and local communities to examine state and regional natural hazard risks, this type of analysis would be duplicative and less impactful in the consolidated planning process. Natural hazard risk analysis should be conducted through other federal, state or regional programs or processes that are devoted to solving infrastructure and hazard mitigation issues. Many states and local governments already conduct hazard mitigation as part of their natural disaster planning. Even though the proposed rule focuses on the risks specific to housing occupied by low-income residents, at its core, the type of analysis is still considered a type of fire and safety issue, not a grant writing piece. Jurisdictions may need to change a building type in order to accommodate for increased fire or flood risks, and the Consolidated Plan does not affect a community’s building code. Including natural hazard risk analysis in the consolidated planning process would be inappropriate and would be an administrative burden for HUD grantees.

As always, NAHRO is appreciative of the opportunity to comment on this important notice. If I can provide any additional information or clarification regarding our suggestions, please do not hesitate to contact me at jhsu@nahro.org.

Sincerely,

Jenny Hsu
Community Development Policy Analyst