

CONVERSATIONS WITH COMMUNITIES:

Considerations for Equitable Flooding and Disaster Recovery Policy



AMERICAN
FLOOD
COALITION



By elevating the voices of historically underserved populations and the community-based organizations (CBOs) that represent them, policymakers can develop equitable policies to address flooding and disaster recovery. This report identifies core themes, raised by CBO leaders during our equity roundtable series, and offers considerations for developing equitable policy.

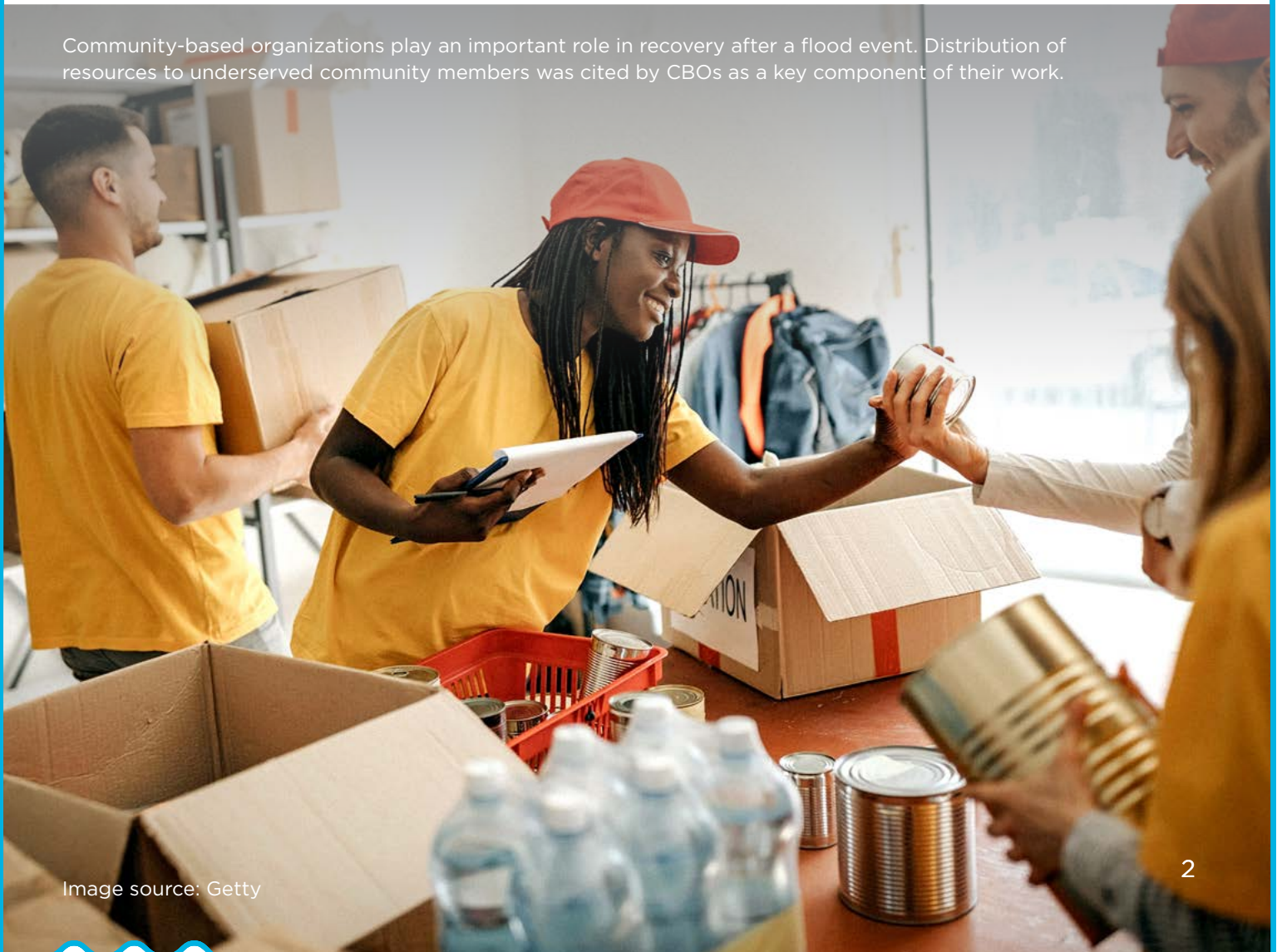
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Image source: Getty

2020 was marked by unprecedented disasters—from a record-breaking hurricane season to the COVID-19 pandemic—with historically underserved communities hit the hardest. Each flood or disaster takes an economic toll on families and businesses and exposes the population to health hazards, often with disproportionate and lasting damage for underserved communities and communities of color in particular. Given the challenges that these communities face in accessing resources for recovery, disasters heighten existing inequities. Policymakers have a crucial role to play in addressing these inequities. **By elevating the voices of historically underserved populations and the community-based organizations (CBOs) that represent them, policymakers can develop equitable disaster policy that works for those who need it the most.**

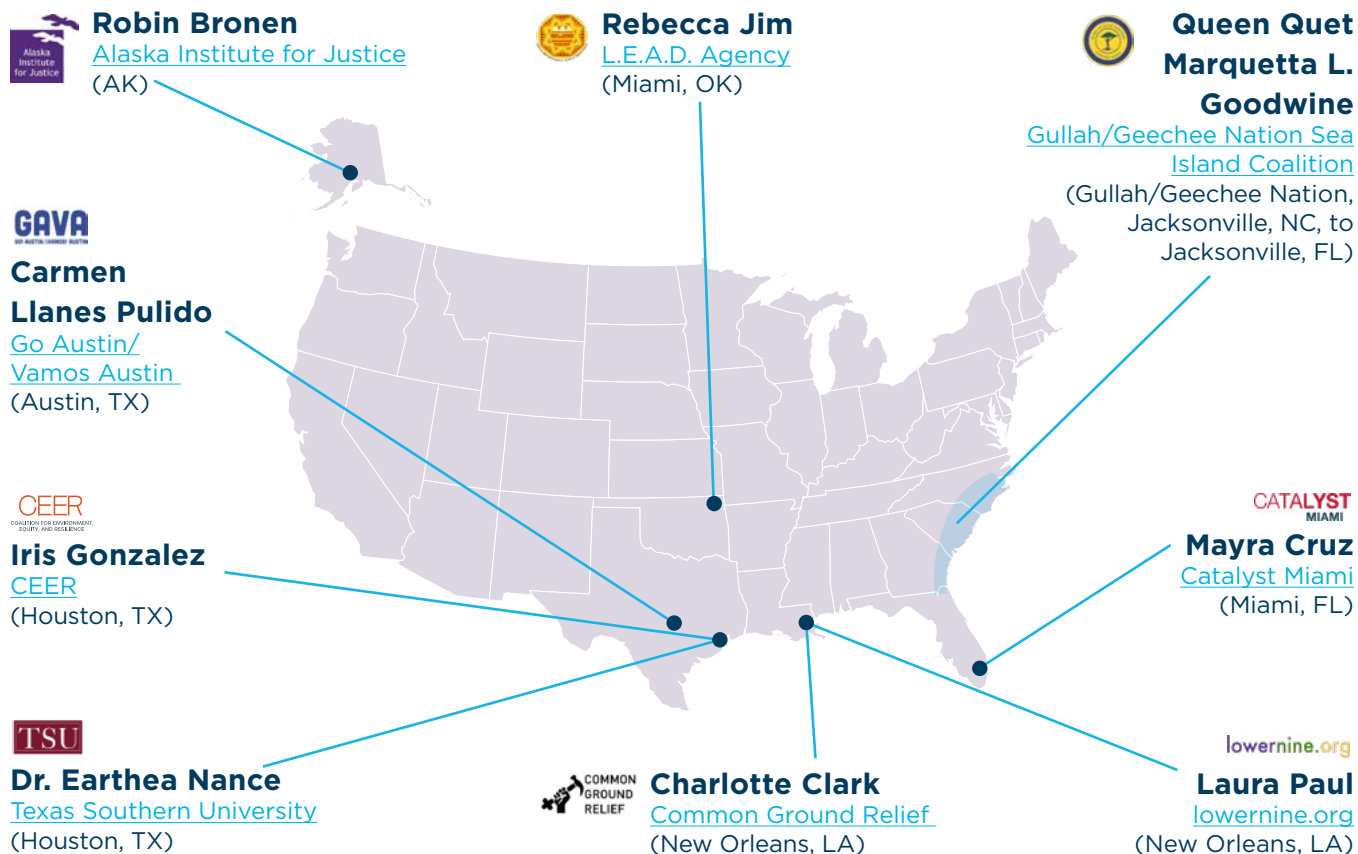
Because equitable policy starts with elevating community voices, the [American Flood Coalition](#) and the [Institute for Diversity and Inclusion in Emergency Management](#) convened a roundtable series with the leaders of eight CBOs, each representing a historically underserved community affected by flooding. Over the course of three discussion-based sessions and a series of surveys in October and November 2020, the participants shared their experiences and recommendations for equitable flood policy at the federal level. In the final session, Congressional staff and federal agency officials working on these issues heard directly from CBO participants and discussed ways to advance equity through federal policy.

Community-based organizations play an important role in recovery after a flood event. Distribution of resources to underserved community members was cited by CBOs as a key component of their work.



Participants

The roundtable participants came from eight community-based organizations across six states: Texas, Louisiana, Florida, Oklahoma, South Carolina, and Alaska. Their organizations work at the intersection of equity and environment, representing diverse perspectives—from low-income communities of color in New Orleans and Miami to Native communities in Alaska threatened by flooding and sea level rise.



Role of community-based organizations

Community-based organizations (CBOs) are nongovernmental, nonprofit entities that serve the needs of local communities. In the wake of a flood or other disaster, CBOs often mobilize aid to community members—the people who live, work, and feel the effects of disasters on the ground—and fill gaps left by government. Given their direct and vital role in disaster recovery, CBOs interact with various levels of government and across agencies. When it comes to flooding and disaster recovery, roundtable participants said they interact most frequently with the following entities: local governments, state governments, the Federal Emergency Management Agency (FEMA), the U.S. Army Corps of Engineers, and the Department of Housing and Urban Development (HUD).

Core themes



PROJECT PLANNING MUST PUT SOCIAL EQUITY FIRST



DISCRIMINATORY POLICIES THAT HARM UNDERSERVED COMMUNITIES MUST BE ELIMINATED



LONG-TERM ENGAGEMENT BETWEEN COMMUNITIES AND FEDERAL OFFICIALS IS CRITICAL TO BUILD TRUST



SOLUTIONS MUST BE COMMUNITY DRIVEN AND SUPPORT LOCAL LEADERS AND NONPROFITS



POLICYMAKERS MUST RECOGNIZE THAT, FOR MANY, ADVOCACY AND PARTICIPATION ARE PRIVILEGES

Development of core themes

Five core themes emerged from the roundtable discussions with CBO leaders and from their survey responses. Collectively agreed upon by the participants, these themes focus on how federal officials can prioritize equity when addressing flooding, adaptation, and disaster recovery. The level of agreement among CBO leaders was striking, given that their communities are geographically diverse, impacted by different types of flooding, and face varied socio-economic challenges. These themes represent wide-ranging systemic issues that warrant the attention of elected officials and federal agencies.

Application of core themes

This report is not a list of policy solutions but rather a guide for federal policymakers in Congress and the Executive branch as they develop equitable approaches. Policymakers can incorporate these themes into most policy work: constituent outreach, collaboration with state and local officials, community engagement, drafting of legislation, and oversight of regulatory policy and federal agencies. By considering these themes and regularly engaging with CBOs that have local knowledge and expertise, federal officials can ensure a holistic approach to disaster policy.



PROJECT PLANNING MUST PUT SOCIAL EQUITY FIRST

Planning for resilience projects and initiatives must put social equity first, with a focus on people ahead of economic factors. **Roundtable participants emphasized that wealthier neighborhoods and business centers are more likely to receive federal resources for flood protection than poorer and historically underserved communities.** Significant [research](#) and reporting from outlets such as [NPR](#) and [Politico](#) support participants' observations about the disproportionate distribution of resources and suggest that marginalized populations are being left behind.

Even when programs and projects do reach underserved communities, participants noted that the needs of their communities are often disregarded. For instance, one CBO leader explained that tribes in their state are being forced to relocate due to sea level rise, in part because government officials determined that the benefit of protecting the communities was not high enough to justify the costs. Another participant highlighted how a mobile flood wall, which was put in place to protect a revenue-generating tourism center, led to flooding in poorer areas previously untouched by floodwaters. In

“ *Environmental injustice continues since property values, and not the value of cultural heritage and human lives, [are] calculated [and] considered. Funding goes to communities where there are higher real estate values and not into the communities that need the real financial support.* ”

—Roundtable participant

both instances, the solutions presented by the federal government failed to successfully address the needs of underserved communities.

Reports confirm the disconnect between federal

policies and community interests that participants raised. For example, the U.S. Army Corps of Engineers factors property value into its [benefit-cost analysis](#) to determine an estimate for avoided flood losses. Using the Corps' analysis, wealthy urban areas with higher property values are [deemed more worthy of protection and investment](#) than poorer cities and rural areas.

100% of participants agreed that their community suffers due to current federal policies on flooding, adaptation, and recovery

80% of participants strongly disagreed that federal policies on flooding, adaptation, and recovery have their community's best interest at heart

✔ Considerations for policymakers

- ➔ Ensure planning, selection, and execution of federally funded projects includes a comprehensive, transparent review of social impacts on all affected populations in a region, especially in historically underserved communities
- ➔ Deemphasize property value considerations in federal benefit-cost analyses to instead prioritize the needs of people, not the protection of wealth



DISCRIMINATORY POLICIES THAT HARM UNDERSERVED COMMUNITIES MUST BE ELIMINATED

Discriminatory policies that harm historically underserved communities are still in effect today, impacting disaster recovery and project planning. **Participants in the roundtable consistently shared that the legacy of colonialism, historical and ongoing racism, and continued discrimination affect policy and lead to exclusionary practices, such as leaving oppressed groups out of decision-making processes.** One participant noted that, in their view, many vulnerable groups have gotten used to daily oppression and have accepted that their voices are diminished or silenced.

According to another participant, the legacy of colonialism means that the federal government often fails to adapt policies that are compatible with the structure of tribal governments. Despite a [2013 provision](#) to allow federally recognized tribal governments to request a disaster declaration, it is often more challenging for tribal communities, which are not organized

into the colonial structure of a city government, to access federal funding and disaster assistance. This leads to further marginalization. For instance, as of 2018, only [30% of tribal nations](#) had a FEMA-approved hazard mitigation plan in place. Creating a plan requires [technical assessments and financial resources](#), which smaller tribes may lack. However, without a hazard mitigation plan, tribes can't receive grants through FEMA's programs to reduce flood risk and increase resilience.

100% of participants agreed or strongly agreed that current federal policies on flooding, adaptation, and recovery contribute to racial inequities in their community

Participants provided several additional examples in which communities could not receive federal assistance because they did not fit within restrictive structures or definitions.

One participant noted that tribes in their state are ineligible for some forms of disaster recovery assistance because their fish camps—which are the tribes' main source of livelihood—have been interpreted as not meeting the geographic restrictions related to damaged dwellings. Narrow and arbitrary interpretations of federal law and regulations have denied access to resources for many underserved communities, particularly communities of color.

71% of participants agreed that a history of discrimination, including redlining, contributes to policy outcomes in their community

Also frequently mentioned were challenges associated with obtaining federal disaster recovery funds for heirs' property. Heirs' property refers to homes and land that have been passed down over generations, often by Black property owners, but lack a clear government-recognized title. As a result, heirs' property owners do not have the paperwork required to apply for certain federal recovery funds that they are otherwise entitled to. [Reports](#) following Hurricane Katrina found that ~20,000 property owners were denied assistance from FEMA and HUD programs because they couldn't show clear titles to their property. A [study by the Emergency Land Fund](#) estimated that 41% of Black-owned land in the Southeast can be considered heirs' property, demonstrating a significant and racialized challenge.

✔ Considerations for policymakers

- ➔ Identify and evaluate the extent to which eligibility requirements for flooding and disaster recovery programs disproportionately exclude underserved communities, then modify rigid program requirements, such as those for formal property ownership documents or high damage thresholds, to be more equitable
- ➔ Ensure that future policies and regulatory actions have a robust and transparent engagement process and actively seek out and incorporate input from a diverse set of rightsholders (individuals that the government has an obligation to), especially underserved communities, tribes, and communities of color who have been harmed or excluded by discriminatory policies



LONG-TERM ENGAGEMENT BETWEEN COMMUNITIES AND FEDERAL OFFICIALS IS CRITICAL TO BUILD TRUST

A lack of sustained community engagement contributes to a lack of trust between federal officials and community members. Participants said their interactions with federal officials, which were infrequent and inconsistent, at times gave the impression that officials were merely “checking a box.” **Participants requested that federal officials not just show up in the wake of a disaster or when it’s politically convenient, but rather maintain a consistent presence through respectful, ongoing conversations with community leaders.** Officials must also recognize that disaster recovery is a long-term process, often taking years, and should support communities with ongoing funding and engagement. With a lasting relationship between local leaders and federal officials, communities can create a more efficient and equitable recovery process that reflects community input.

All levels of government are involved in flood projects, and according to participants, communication could be improved with proactive engagement, open processes, and responsiveness from officials at all levels. When discussing a local project, one CBO participant noted that the city government had not actively engaged with the community and that most community members, even those who would be directly affected by the project, did not know about it. In that instance, the city-administered project had no community engagement budget. Other participants said that communities often feel local governments value input from academics or consultants without ties to the community more than the input of CBOs and community groups. Additionally, language barriers can prevent community members from understanding and participating in the disaster recovery process, despite [FEMA protocols for language access](#). To remedy this issue, hazard mitigation and disaster recovery plans and community meetings must

In a survey of roundtable participants, **83%** of respondents said they would characterize their level of communication and interaction with federal representatives as “slight,” while **71%** would characterize their level of communication and interaction with local representatives (e.g., Mayor, City Manager) as “strong”

83% of roundtable participants said they “disagree” or “strongly disagree” that their community’s input is valued and taken into account in the policy decision-making process

be translated or interpreted into the primary languages of community residents in order to advance justice and equity when flooding occurs. When community engagement fails for these and other reasons, the result is often discriminatory plans.

✔ Considerations for policymakers

- ➡ Require that projects, including those that bring in outside contractors or academics, have a substantial budget for community outreach activities and specific metrics around cultural competency and local input
- ➡ Put in the time and effort to build trust with community members and form long-standing working relationships that support a stronger, more inclusive planning process through consistent conversations, clear language that avoids jargon, and respect for community input



POLICY SOLUTIONS MUST BE COMMUNITY DRIVEN AND SUPPORT LOCAL LEADERS AND NONPROFITS

Federal policy makers must support and drive forward solutions that are developed by local leaders and their communities. As roundtable participants explained, after

floods, community leaders, including those that work at CBOs, play an essential role in both disaster recovery and planning for future risk. This means that when disaster strikes, community members are far more likely to turn to the local leaders they already know than to federal officials.

Rather than create a one-size-fits-all approach, federal officials and policymakers must focus disaster response on supporting local leaders who



More effort is needed to build bridges between policymakers and CBOs. Policymakers can use the relationships with local governments to identify CBOs they can reach out to [in order to] start a dialogue. In general, timelines for communication should probably be shifted. As soon as federal projects are being considered in an area, policymakers should start outreach on the ground... before any concrete plans are in place. I think policymakers run into trouble when they already have plans or ideas in place before getting meaningful community input. I'm a huge fan of workshops, focus groups, and interactive meetings to start conversations.

—Roundtable participant

Core concerns for historically underserved populations in the aftermath of a flood



Temporary shelter



Access to resources (food, transportation)



Evacuation



Financial assistance

Top responses from participants

know their communities' needs and provide support to those working on the ground. According to one CBO leader, following a hurricane several years ago, tensions between FEMA officials and community members were apparent from the first meeting. FEMA officials rejected the ideas proposed by the community, saying they were not possible to execute. FEMA's solution, however, was seen as ineffective, even by the federal officials proposing it. Ultimately, FEMA failed to effectively support community leaders, hampering the recovery process.

Alternatively, another participant shared that in their state, local officials are given a lot of responsibility during disasters. In partnership with that state, a local leader communicates with community members in both English and Spanish, issuing frequent press releases to ensure that residents are informed. The participant said that this approach of centering recovery around local voices has worked well in reaching more of the community.

When asked about their organizations' primary roles after a flood, the cohort of CBO leaders cited essential tasks, such as distributing resources, assessing damage, mobilizing volunteers, and coordinating with local, state, and federal agencies. These community leaders are some of the first responders to an impending disaster and remain engaged in the recovery process long after short-term responses by federal and state officials have ended. Participants encouraged officials to center their solutions on the community's needs and the actors on the ground.

Role of CBOs in the aftermath of a flood

Distribution of resources



Assessment of damages



Mobilization of volunteers



Coordination with local, state, and federal agencies



Top responses from participants

✔ Considerations for policymakers

- ➔ Identify and establish contact with key CBOs that provide aid in the wake of disasters in order to center federal agencies' recovery and planning strategies around the input of local leaders, both elected officials and unelected
- ➔ Increase direct, proactive engagement with and provide resources to community leaders throughout disaster response and recovery to ensure that the recovery process and any flood risk reduction strategies are community driven, incorporate local input, and are designed to meet the community's specific needs, avoiding one-size-fits-all approaches



POLICYMAKERS MUST RECOGNIZE THAT, FOR MANY, ADVOCACY AND PARTICIPATION ARE PRIVILEGES

Policymakers must provide opportunities for underserved community members to have a voice in stakeholder processes and access resources for disaster recovery. Many community members do not have the resources to advocate for themselves and their neighborhoods, particularly in the wake of a disaster. Participants stressed that community members, especially those in underserved communities, lack the time and capacity to engage

in project planning processes, such as submitting aid applications, applying for grants, and attending planning meetings. After a disaster, community members often struggle financially and experience mental and physical trauma. It is unreasonable to expect them to spend hours attending meetings, reading regulations, or filling out paperwork. **CBO participants underscored that participation in community processes and advocacy is a privilege, meaning that those who have the ability to participate are heard, while underserved community members are left out.**

“*Few decisions are directly made by the people. Except for the most politically involved, community members typically do not have the capacity or the opportunity to participate in these feedback processes.*”

—Roundtable participant

Administrative burdens can also prevent CBOs from accessing government resources. In fact, a [recent report](#) from the Government Accountability Office highlighted the accessibility challenges related to FEMA’s Hazard Mitigation grants and suggested the need to streamline the application process. Grants are judged largely on the narrative and level of detail put into applications—but many

CBOs that need assistance lack both the time to complete applications and the resources to hire expert grant writers. Additionally, for CBOs that are busy working on the ground with community members, conducting a comprehensive review of proposed federal policies and submitting comments by the deadline is often impossible. Even though new programs, like FEMA’s new [Building Resilient Infrastructure and Communities](#) (BRIC) program, present opportunities for communities to become more resilient, CBOs often lack the resources and capacity to weigh in, which means that the voices of historically underserved communities go unheard.

Despite these challenges, participants noted several best practices that have been employed by governmental entities to increase community participation. Participants shared that meeting people at existing community events or festivals is a more effective engagement strategy than holding standalone meetings. Plus, holding different types of meetings to get to know community members—like an informal meeting with food and childcare available, as suggested by one participant—will lead to more successful community participation. Governmental entities must recognize that community members’ time and input is valuable and create opportunities that allow anyone to advocate for themselves and their community.

✔ Considerations for policymakers

- ➔ Make processes more accessible and provide incentives for community members, particularly in underserved communities to participate in planning. Provide compensation for time, arrange onsite childcare, and host accessible meetings, either through virtual calls or through meetings in locations convenient to underserved communities
- ➔ Provide robust technical assistance for all grant and disaster assistance applications, in addition to targeted application assistance to underserved communities and CBOs that represent underserved communities
- ➔ Ensure that all meetings and communications, including planning documents, are easily accessible, succinct, and available in multiple languages; consider those with disabilities; and provide ample time for community members to provide input

Conclusion

While current federal policy solutions on flooding are well intentioned, they often compound existing inequities by failing to fully consider the best interests of historically underserved communities. **Throughout the roundtable discussions, CBO leaders from across the country repeated many of the same challenges and themes, primarily about the disconnect between federal policy and the needs of communities.** To eliminate inequities in the flooding, adaptation, and disaster recovery space and ensure that all communities have access to resources to address their flood risk, policymakers should incorporate the core themes of this report into all stages of policy work: project planning must put social equity first; discriminatory policies that harm underserved communities must be eliminated; long-term engagement between communities and federal officials is critical to building trust; solutions must be community driven and support local leaders and nonprofits; and advocacy and participation must be recognized as privileges.

Policy makers are also encouraged to reach out directly to CBOs that can provide a wealth of knowledge and may be able to speak to the concerns of underserved communities. Through the roundtable series, AFC and I-DIEM have established a relationship with the cohort of CBO participants, who represent a wide range of geographies and perspectives. With decades of working with historically underserved communities, these CBO leaders have invaluable experience and insights to offer. Federal officials seeking to incorporate input from CBOs into policy development and implementation are encouraged to reach out to AFC and IDIEM to discuss how to leverage our existing network to seek feedback from CBO leaders.

To truly understand challenges faced by underserved communities and to create policies that advance equity, policymakers must seek out and listen to these voices. Informed policy changes, along with the shift of power and aid to historically underserved communities, will create a more equitable post-flood landscape that benefits all communities.

*The **American Flood Coalition** is a nonpartisan group of cities, elected officials, military leaders, businesses, and civic groups that have come together to drive adaptation to the reality of higher seas, stronger storms, and more frequent flooding through national solutions that support flood-affected communities and protect our nation's residents, economy, and military installations.*

The Coalition has over 250 members across 19 states.

*The **Institute for Diversity and Inclusion in Emergency Management** is a 501(c)3, global non-profit organization established to facilitate change by integrating equity into all aspects of emergency management. Our focus is on humanity, and our vision supports the empowerment of marginalized communities within all phases of the disaster management cycle.*