



July 18, 2016

Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th Street, SW
Room 10276
Washington, DC 20410-0500

Docket No. FR-5891-P-01

RIN 2506-AC41

Office of the Assistant Secretary for Community Planning and Development

Modernizing HUD's Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards

Re: Comments on Modernizing HUD's Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards proposed rule

To Whom It May Concern:

The National Housing Conference (NHC) appreciates the opportunity to comment on the proposed rule to incorporate evaluation of broadband access and resilience to natural hazard risks for low- and moderate-income residents into the consolidated planning process. We welcome HUD's action to narrow the digital divide and increase resilience to natural hazards. We offer several comments here in hopes of making the proposed rule more effective.

I. About the National Housing Conference

The National Housing Conference represents a diverse membership of housing stakeholders including tenant advocates, mortgage bankers, nonprofit and for-profit home builders, property managers, policy practitioners, real estate professionals, equity investors, and more, all of whom share a commitment to safe, decent and affordable housing for all in America. We are the nation's oldest housing advocacy organization, dedicated to the affordable housing mission since our founding in 1931. We are a nonpartisan, 501(c)3 nonprofit that brings together our broad-based membership to advocate on housing issues.

II. Increasing Internet access for low- and moderate- income residents

NHC with its Connectivity Working Group has conducted [research](#) on the digital divide which highlights the importance of providing low-income renters with home broadband access. Having a home computer or tablet and internet access is increasingly important for individual and family well-being and self-sufficiency. The availability of internet access is associated with greater student achievement, improved health outcomes, less social isolation and more economic growth. However, low-income individuals, and especially very low-income renters, are much less likely to have internet access or a computer at home. This digital divide worsens economic inequality and risks leaving low-income families further behind.

In 2013, 74 percent of U.S. households had home access to the Internet but only 46 percent of extremely low-income renters had home access to the Internet. Only 54 percent of very low-income renters had home access to the Internet. The digital divide is even more pronounced for older adults and disabled individuals. Only 26 percent of very low-income senior renters have home Internet access, and only about one-third of very low-income disabled renters have home Internet access.

In response to the digital divide facing low-income households, NHC's Connectivity Working Group, a group of national advocates, developers, public housing authorities, lenders, investors and others, developed policy recommendations that could expand connectivity in low-income housing, which are included as an appendix to our comments.

III. Increasing resiliency for low- and moderate- income residents

Natural disasters are a major threat to lives and property nationwide, and the threat is increasing. Housing decisions by individuals and governments are an essential part of making our homes and communities safer in the face of nature's wrath.

Low-income families and communities are especially impacted by natural disasters. Their housing is often older and less likely to be built to withstand storms or other damage. Damage can often go unattended, leaving housing stock more vulnerable to future disasters. Low-income families are least likely to be able to afford mitigation measures, and rental property owners may lack motivation or means to protect rental homes. Low-income families are most affected by displacement, and have the least means to rebuild. Communities of color generally bear a disproportionate impact.

For these reasons, federal, state and local policies should encourage and provide incentives for making housing, specifically affordable housing, better able to withstand nature's wrath. Coordinated planning is a useful first step in this direction, although increased resources from state, local, and/or federal sources will be necessary for many resiliency measures.

IV. Comments on the proposed rule

Incorporating evaluation of broadband access and resilience to natural hazard risks for low- and moderate-income residents into the consolidated planning process is a positive step forward. Housing decisions affect both connectivity and resiliency and vice versa, so public policy planning should reflect those interconnections. Agencies tasked with meeting affordable housing needs are already coordinating with broadband providers, floodplain managers, emergency response agencies, and other stakeholders in these areas. That coordination should expand and spread.

We recognize the importance of the data used in the consolidated planning process. The required internet data metrics should include (but not be limited to) the availability, costs, and adoption rates of broadband. We direct HUD to the National Digital Inclusion Alliance's comments on this proposed rule; they have content area expertise in this area and can best direct HUD to other data options available.

We also recognize that coordinated planning precedes policy action, and that the planning process measured in isolation generally costs less by orders of magnitude than the policy action it prescribes. This proposed rule does not provide additional resources for the consolidated planning process, nor does it fund policy action that can and should emerge from planning. We believe that collaboration between state and local jurisdictions with broadband Internet service providers, organizations engaged in narrowing the digital divide, and floodplain managers, among others, during the consolidated planning process will require significant time and resources from state and local governments, many of which have seen decreasing federal assistance for housing and community development programs. We appreciate that the proposed rule directs agencies to existing resources to guide them in these two areas. We urge HUD to provide further resources and technical support in these areas, especially for smaller agencies who may be encountering them for the first time. We also encourage HUD and the agencies involved in the planning to set realistic expectations for public policy actions scaled to the funds available.

V. Conclusion

This proposed rule is an important step toward achieving narrowing the digital divide and increasing resilience for low- and moderate- income households. The proposed rule would bring organizations and people from outside of the housing world to the planning table and work towards achieving a more effective community planning process. To discuss any of these comments in further detail, please contact Kaitlyn Snyder, Policy and Research Associate, National Housing Conference, (202) 466-2121 x250, ksnyder@nhc.org.

Sincerely,

Chris Estes

Chris Estes
President and CEO