

Mitchell Berger Mazruia@hotmail.com January 27, 2023

Agency Information Collection Activities: Proposed Collection; Comment Request; Public Assistance Program, <https://www.federalregister.gov/documents/2022/12/14/2022-27082/agency-information-collection-activities-proposed-collection-comment-request-public-assistance>

To: Rachel Hildebrand, Acting Chief, Public Assistance Program Delivery Branch,  
Rachel.Hildebrand@fema.dhs.gov

Dear Ms. Hildebrand: I write to make the following suggestions:

- **DRAFT: Hazard Mitigation Addendum:** Would suggest in this form permitting revisions that would support not only the structural changes discussed such as building elevation, communication system enhancements and water control but also additional changes that could support infrastructure use as resilience hubs and cooling centers.<sup>1</sup> Cooling centers as defined by the Centers for Disease Control and Prevention are “location[s], typically an air-conditioned or cooled building that has [have] been designated as a site to provide respite and safety during extreme heat.” More broadly, resilience hubs can support day-to-day needs such as health and social services, recovery, and emergency response activities.<sup>2</sup> Additional structural changes may be required, however, to support such uses beyond those encompassed in the current draft form.
- With respect to this form’s discussion of energy facility or systems, some institutions, including hospitals, are emphasizing solutions such as microgrids in lieu of or as a complement to generators.<sup>3</sup> It may be helpful to clarify whether such alternative power projects can receive public assistance funding.
- **DRAFT: FEMA Form FF-104-FY-22-233 Organization Profile:** this form lists “(Optional) Climate Adaptation Plan.” Would define what is meant by climate adaptation and broaden to include resilience and mitigation (also defining these terms).<sup>4</sup> In addition to the CDC’s Social Vulnerability Index, consider referencing other similar tools such as the Environmental Justice Index or NIH’s HDPulse.<sup>5</sup> In the question on underserved communities, consider also referencing persons with chronic medical conditions (including behavioral health needs), persons with physical disabilities, tribal populations (AI/AN) and/or persons in poverty.<sup>6</sup>

Thank you for consideration of these comments.

Sincerely,



Mitchell Berger Note: I am a federal employee. However, these comments reflect solely my personal views and should not be imputed to any public or private entities.

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<sup>1</sup> S. Widerynski et. al. The Use of Cooling Centers to Prevent Heat-Related Illness: Summary of Evidence and Strategies for Implementation, [https://www.atsdr.cdc.gov/placeandhealth/share/onemap\\_heat-crsci/extreme\\_heat\\_home.html](https://www.atsdr.cdc.gov/placeandhealth/share/onemap_heat-crsci/extreme_heat_home.html)

<sup>2</sup> See e.g., Thayanne G.M. Ciriaco, Stephen D. Wong, Review of resilience hubs and associated transportation needs, Transportation Research Interdisciplinary Perspectives, Volume 16, 2022, 100697

<sup>3</sup> <https://blog.se.com/healthcare/2019/07/18/hospital-microgrids-going-beyond-backup-generators-to-ensure-resiliency/>;  
<https://pvsolarreport.com/how-solar-emergency-microgrids-keep-the-lights-on-after-natural-disasters/>;  
<https://www.utilitydive.com/news/california-pucs-delay-of-microgrids-program-harms-disadvantaged-communities/639823/>

<sup>4</sup> <https://www.epa.gov/arc-x/planning-climate-change-adaptation>; <https://toolkit.climate.gov/>

<sup>5</sup> <https://www.hhs.gov/climate-change-health-equity-environmental-justice/environmental-justice/index/index.html>;  
<https://www.atsdr.cdc.gov/placeandhealth/eji/eji-index.html>; [hdpulse.nlm.nih.gov/](https://hdpulse.nlm.nih.gov/)

<sup>6</sup> <https://www.irp.wisc.edu/resources/how-is-poverty-measured/>