

## DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ENVIRONMENTAL JUSTICE STRATEGY UPDATE

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This document is intended as a starting point for dialogue with environmental justice (EJ) and other interested stakeholders as the Department of Housing and Urban Development (HUD) begins the process of updating its departmental environmental justice strategy in accordance with Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations" (1994). In order to better structure the engagement process, HUD has summarized key themes from previously received public comments, as well as information about how HUD programs and policies address issues commonly raised by environmental justice stakeholders. In providing this information at the beginning of the process, HUD hopes to provide interested parties with a resource that can be used to inform their comments and recommendations, both in this early phase and on HUD's Draft Environmental Justice Strategy, when published for formal public comment.

### **Background:**

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations" (1994) requires certain federal agencies, including HUD, to consider how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and low-income populations. The order also directs HUD to develop a strategy for implementing environmental justice. In 2011, HUD began the process to develop its current 2012 – 2015 Environmental Justice Strategy (2012 EJ Strategy), ultimately posting the final strategy<sup>1</sup> in April 2012. In addition, in October 2014, HUD completed its Climate Change Adaptation Plan<sup>2</sup> and included many action items with environmental justice implications in that document. As the 2012 EJ Strategy is set to expire at the end of 2015, HUD is embarking on the process of updating the department-wide strategy, with the goal of publicly posting a final strategy in February 2016.

### **Public and Stakeholder Comment Review:**

As a part of the EJ Strategy update process, HUD staff, coordinated by the Office of Economic Resilience, have been reviewing relevant, previously submitted formal stakeholder comments, as well as informal comments and suggestions received at various environmental justice-focused listening sessions, community meetings, conferences and events to help inform HUD's EJ strategy update. After the first draft of the 2012-2015 environmental justice strategy was published, HUD offered a formal public comment period through the Federal Register. In addition, HUD participated in many of the 20+ environmental justice listening sessions organized by the Interagency Working Group on Environmental Justice from 2011-2014. HUD gathered additional comments<sup>3</sup> at those

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<sup>1</sup> HUD's 2012-2015 Environmental Justice Strategy is available at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/economic\\_resilience/Environmental\\_Justice\\_Strategy](http://portal.hud.gov/hudportal/HUD?src=/program_offices/economic_resilience/Environmental_Justice_Strategy)

<sup>2</sup> HUD's Climate Change Adaptation Plan is available at: <http://portal.hud.gov/hudportal/documents/huddoc?id=2014SusCCAPRel.pdf>

<sup>3</sup> Summaries of received comments and previous responses from both processes are available online at [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/economic\\_resilience/Environmental\\_Justice\\_Strategy](http://portal.hud.gov/hudportal/HUD?src=/program_offices/economic_resilience/Environmental_Justice_Strategy)

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listening sessions, as well as through informal interactions with stakeholders at environmental justice and health-related conferences.

#### Providing Comments – Phase 1:

At this time, HUD has not yet developed its EJ Strategy update and is soliciting general comments and recommendations for areas of focus to be considered in the update. HUD is also seeking programs or policies of most interest to EJ stakeholders. Comments may be submitted in the following ways:

- *HUD Switchboard site* – An interactive website for ideation, feedback, and crowdsourcing. A specific site for the EJ Strategy update has been created at:  
<http://switchboard.uservoice.com/forums/312703-environmental-justice-strategy>
- *Via email* to [EJStrategy@hud.gov](mailto:EJStrategy@hud.gov)
- *Scheduled stakeholder phone calls:*
  - Call #1: TBD (this document will be updated soon with date/time and call-in information)
  - Call #2: TBD (this document will be updated soon with date/time and call-in information)

#### Document Organization:

This document is organized into two main sections:

- *Key concerns raised by environmental justice stakeholders* – This section is comprised of summaries of commonly-raised concerns that are broad and cross-cutting across multiple HUD policies and programs. Stakeholders are welcome to comment on the current relevance of the summarized concerns as well as recommend additional topics for consideration.
- *Areas not previously presented in HUD's annual EJ progress reports* – The process of public comment review illuminated a number of issue areas of concern to commenters where HUD has made recent progress, but has not always communicated clearly to environmental justice stakeholders. This section summarizes HUD efforts in those areas including green building, healthy homes, and fair housing planning.

#### EJ Strategy Update Timeline:

<i>August 2015:</i>	Solicit initial public input
<i>October 2015:</i>	Post Draft Environmental Justice Strategy in the Federal Register for at least a 45-day Public Comment period
<i>February 2015:</i>	Post Final Environmental Justice Strategy and Response to Public Comments

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*KEY CONCERNS RAISED BY ENVIRONMENTAL JUSTICE STAKEHOLDERS*

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**1. Meaningful Involvement in Decision-Making:**

Stakeholders expressed a desire for meaningful involvement in both HUD decision-making processes as well as the programs in which recipients of funding are involved. They also asked whether or not HUD had clear guidance across relevant programs on what constituted meaningful involvement in decision-making or the standard for good public participation.

Other issues raised include: providing guidance that is both linguistically and culturally appropriate, measuring community empowerment-related outcomes, and incorporating environmental justice principles and meaningful involvement-related criteria into HUD discretionary Notices of Funding Availability (NOFAs).

**2. Clear Processes for Raising EJ Complaints to HUD**

Stakeholders appreciated the transparency and solicitation of feedback that HUD had promoted in some of its previous programs and in the EJ strategy development. These stakeholders believe HUD should maintain transparency by creating an accessible, streamlined process for residents to report HUD-related EJ issues in their communities. These could be issues related to environmental review responsibilities, including NEPA or Title VI-related issues. At present, stakeholders were unclear how to raise EJ issues to HUD. They further articulated that any process created should be clear, streamlined and easily accessible to local residents through multiple mediums according to their needs.

**3. Clear guidance and protections related to displacement, relocation, and right-of-return:**

Issues around gentrification, disaster-related displacement, and redevelopment of HUD-assisted housing were raised frequently by stakeholders. Of particular concern were HUD efforts to consider gentrification in its sustainable communities work, to promote right-of-return and one-for-one replacement policies in both disaster and redevelopment contexts, and to offer equitable relocation plans. In this context, the importance of meaningful involvement in decision-making was again raised as well.

In addition, some commenters highlighted threats to environmental justice communities due to the impacts of climate change. They raised the importance of considering relocation and other needs for those communities on the “front lines” of climate change. Ultimately, stakeholders were concerned with ensuring HUD-assisted residents’ continued to have access to healthy foods, public transit, healthcare facilities, quality educational institutions, etc.

**4. Clear information about how HUD serves rural communities and challenges in accessing funding:**

Multiple stakeholders noted that rural communities have unique and challenging circumstances. They expressed concern that many of HUD’s programs do not adequately address the needs of rural communities or that rural communities are at a disadvantage as

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compared to urban areas with respect to funding allocations or ability to compete in discretionary programs.

**5. Guidance and training for HUD staff on embedding environmental justice into our work**

Stakeholders raised concerns that HUD staff members were not adequately familiar with the topic of environmental justice and how to identify EJ issues in their programs or in the work of recipients of HUD funding. They recommended that HUD offer more training to staff and leadership on environmental justice and how it relates to HUD's portfolio.

**6. Better communication about programs and resources that serve EJ needs, with particular attention to the "digital divide" and LEP accessibility**

Stakeholders were broadly appreciative of HUD's efforts to highlight EJ-related programs, tools, and policies, but also pointed out the access issues faced by many EJ communities and populations. These include lack of access to broadband internet, linguistic isolation, and low literacy levels. They also raised general concerns around the use of overly technical language and the large time commitment required to find relevant information through HUD's website. In general, they requested more plain-English and translated documents, as well as resources to be available in hard-copy formats for those without internet access.

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*AREAS NOT PREVIOUSLY PRESENTED IN HUD'S ANNUAL EJ PROGRESS REPORTS*

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The below topics represent frequently cited issues, concerns, and areas of interest raised by environmental justice stakeholders where HUD has ongoing relevant programs, policies and activities. HUD is presenting these here in summary form with the goal of providing interested stakeholders with clear information and weblinks to these programs and policies in a single location.

**Comprehensive Neighborhood Revitalization:**

*Commenters expressed interest in HUD's efforts around comprehensive neighborhood revitalization, particularly with respect to crime and violence prevention strategies.*

Choice Neighborhoods, one of HUD's signature place-based initiatives, enables communities to revitalize struggling neighborhoods with distressed public housing or HUD-assisted housing. Through these grants, local leaders, residents, and other community stakeholders are replacing distressed housing with vibrant, mixed-income communities, catalyzing new retail and businesses; turning around failing schools, strengthening early education; preventing crime, improving transportation; ensuring basic neighborhood assets and increasing access to jobs.

As part of this effort, Choice Neighborhoods specifically promotes sustainability and livability. Implementation grantees are required to achieve efficiency standards in new housing construction and incorporate sustainable construction and demolition practices. They are also encouraged to achieve LEED-ND certification or a similar neighborhood sustainability standard. Meanwhile, Planning grantees are required to incorporate sustainable development practices into their transformation plans, including supporting compact development and proximity to transportation choices, amenities, services, and employment opportunities. Planning grantees are also encouraged to improve resident health by adopting green building practices.

Choice Neighborhoods contributes to HUD's vision of achieving environmental justice by requiring tenant involvement and neighborhood participation as part of the transformation plan process and during subsequent revitalization. This revitalization provides distressed communities with the opportunity to improve the livability and sustainability of their surrounding environment. For example, a number of Choice Neighborhoods grantees have linked their work with brownfields remediation efforts. In Norwalk, CT, the Norwalk Housing Authority secured state brownfields funding to pair with other sources of financing for redevelopment in the Washington Village/South Norwalk area. In Wilson, NC, the Wilson Housing Authority, a 2011 Choice Neighborhoods Planning Grantee, has begun the rehabilitation of the Whitfield public housing property, of which 20 percent was vacant and uninhabitable. The City of Wilson, using brownfield grants, completed cleanup of a former petroleum company site in the neighborhood and has attracted new retail to the site. The planning process helped leverage both public and private resources for brownfield remediation, facility improvements, land acquisition, as well as addressing the community's concerns about safety.

Communities across the country have leveraged Choice Neighborhoods funds to reduce the rate of violent crimes in the neighborhoods, foster relationships between police departments and members of their communities, provide services to at-risk youth, and utilize more engaged and targeted policing strategies; which in turn has helped with economic development strategies and addresses the negative impacts of isolation many low income families experience due to living in

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high crime, high poverty neighborhoods. Choice Neighborhoods grantees are expected to pursue a public safety strategy that is community-based and brings together criminal justice entities with other community groups and institutions to coordinate activities that improve key measurable outcomes for community safety. These activities are expected to balance enforcement efforts targeting serious public safety concerns associated with Part I Violent Crimes, gang activity and illegal drugs with strategies that focus on prevention, intervention and community-building. In addition, nine Choice Neighborhoods across the county have leveraged their public safety efforts to secure Byrne Criminal Justice Innovation grants from the Department of Justice.

For more information on Choice Neighborhoods, see: <http://www.hud.gov/cn>

### **Community Development Block Grants (CDBG) and Public Participation:**

*Commenters expressed interest in learning more about how to participate in local funding allocations for Community Development Block Grant funds*

As part of the Consolidated Planning process, units of local government receiving CDBG from their state must follow the requirements of 24 CFR 570.486, which provides for, and encourages, citizen participation. The process emphasizes participation by persons of low- or moderate-income, particularly residents of predominantly low- and moderate-income neighborhoods, slum or blighted areas, and areas in which the local government proposes to use CDBG funds. The plan must:

- Provide citizens with reasonable and timely access to local meetings, information, and records related to the grantee's proposed and actual use of funds
- Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program; including, at least the development of needs, the review of proposed activities, and review of program performance
- Provide for timely written answers to written complaints and grievances
- Identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate

Local points of contact for CDBG grantees are available at:

<https://www.hudexchange.info/grantees/>

### **Fair Housing Planning:**

*Commenters expressed interest in HUD's efforts to advance fair housing planning, particularly through the revision of the Affirmatively Furthering Fair Housing rule.*

On July 8, 2015, HUD announced the Affirmatively Furthering Fair Housing (AFFH) Final Rule. The rule clarifies and simplifies existing fair housing obligations for HUD grantees to analyze their fair housing landscape and set locally-determined fair housing priorities and goals through an Assessment of Fair Housing (AFH). To aid communities in this work, HUD will provide open data to grantees and the public on: patterns of integration and segregation, racially and ethnically concentrated areas of poverty, disproportionate housing needs, and disparities in access to

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opportunity. Grantees will supplement this uniform HUD-provided data with local data and knowledge to inform local decision-making, including information obtained through a robust community participation process. The AFFH rule enables broader participation and transparency in public planning and decision making, ensuring that residents throughout the community have a voice in community development decisions and a role in shaping their region's future.

The AFFH process will help focus scarce resources on improving equal access to opportunity, diminishing or preventing the emergence of areas of concentrated poverty by race, color, national origin, religion sex, disability or families with children, and supporting diverse and integrated communities. Through data provision, new guidance, technical assistance, and iterative discussion, HUD intends to make the Assessment of Fair Housing process a productive part of community planning.

For more information, see: [http://www.huduser.org/portal/affht\\_pt.html](http://www.huduser.org/portal/affht_pt.html)

### **Green building in HUD-assisted Housing**

*Commenters expressed interest in how green building efforts were reaching low-income and other vulnerable communities.*

Across its programs, HUD supports the construction, retrofit, operations, and maintenance of a vast housing stock that serves the needs and enhances opportunity for millions of citizens. By promoting the use of best green building and energy retrofit practices, HUD is committed to improving the quality of that housing stock in terms of utility efficiency, resident health, environmental stewardship, disaster resilience, and cost effectiveness. By investing in high quality buildings and working to lower and/or stabilize utility costs, HUD is able to preserve affordable housing, combat climate change, reduce air pollution, conserve natural resources, improve public health and increase emergency preparedness in the communities it serves.

Since the beginning of FY10, HUD has supported the use of green building practices in the new construction and retrofit of over 460,000 housing units. With a special emphasis on energy efficiency and renewable energy, HUD has launched two high-profile initiatives as part of the President's Climate Action Plan. Through the Better Buildings Challenge, HUD is encouraging affordable housing providers to reduce their energy consumption by 20% across their housing portfolios. Also, through Renew300, HUD is encouraging affordable housing providers to install on-site and community/shared renewable energy systems towards a 300MW goal of installed capacity across the nation's federally assisted housing stock. A focus on renewable energy systems for low income communities and households will help to ensure all families are able to participate in the new clean energy economy, regardless of neighborhood or income. Participation in the BBC and Renew300 allows partners to access technical assistance and share lessons learned; as well as financial incentives offered by individual program offices.

Additionally, HUD and other federal partners have launched "STEM, Energy, and Economic Development" or "SEED." SEED is a place-based initiative, currently operating in five cities: DC, Cleveland, Tampa, San Antonio and Denver. This project will leverage Federal investments and partnerships to support workforce development and educational opportunities in the energy sector

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for public housing residents; a traditionally underserved population in both science-based education and green-collar job opportunities.

For more information on HUD's work on green building, see:

<https://www.hudexchange.info/energy/>

### **Healthy Homes:**

*Commenters expressed interest in a wide variety of Healthy Homes topics, including efforts to examine issues beyond lead hazards and to collaborate with other agencies.*

HUD recognizes a healthy home as one that provides the most basic needs for the promotion of physical, mental, and social health, regardless of the income status of the resident or location of the dwelling. Additionally, homelessness, as the absence of any healthy housing, is also recognized due to its serious impacts on health. There are numerous characteristics of a healthy home that relate to its structural integrity and material composition; to the level of safety associated with the home, to the indoor air or water quality within the residence; and to the presence of pests or chemical exposures that present potential health risks. Individual resident behaviors (e.g., smoking), and design elements that link the home to the neighborhood or community, are also important to the healthy homes concept. The healthy homes concept is one that views the home as a holistic system and the well-being of occupants as conditional on all elements of that system.

The Office of Lead Hazard Control and Healthy Homes, along with the federal Healthy Homes Work Group that authored a healthy homes strategy and action plan (*Advancing Healthy Housing: A Strategy for Action, 2013*<sup>4</sup>), promote eight principles that are fundamental to housing being healthy and safe for residents. A healthy home must be:

- Dry
- Clean
- Pest-free
- Contaminant-free
- Safe
- Well-ventilated
- Well-maintained
- Thermally-controlled

### ***Comprehensive considerations of health inside the home (beyond lead hazards)***

OLHCHH currently holds a comprehensive portfolio of healthy homes initiatives beyond lead that are associated with health disparities in communities. The OLHCHH is the primary HUD office developing and promoting smoke-free multifamily housing policies within the Department. We also collaborate with other federal agencies on projects and analyses that support this initiative. Similarly, OLHCHH was a driving force behind the Office of Multifamily Housing decision to require radon testing and mitigation, where appropriate, for most new FHA-insured construction,

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<sup>4</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/healthy\\_homes/advhh](http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/advhh)



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conversion and substantial rehabilitation projects, as well as most FHA-insured refinance transactions. The Multifamily radon policy affects approximately 100,000 units per year.

In coordination with USDA, the OLHCHH spearheads an initiative to provide training and technical assistance to public housing agencies and federally assisted multifamily housing providers on the adoption of integrated pest management for their properties. Within the Department, OLHCHH is leading development of guidance material for multiple end users mitigating unsafe and unhealthy conditions in a home during disaster recovery.

In addition to work within the home, OLHCHH has led development of an evidence-based Healthy Communities Assessment Tool (HCAT) that will allow cities to evaluate their neighborhoods using a set of 42 indicators examining the physical, social and economic roots of community health. Development of the HCAT has involved three HUD offices, and included collaborative exchanges with other agencies with similar initiatives, particularly EPA's Office of Environmental Justice and the Department of Transportation.

### ***Healthy Homes collaboration with HHS and EPA***

OLHCHH has a long standing track record of collaborating with numerous other agencies to accomplish mutual goals on healthy homes topics. Since 2009, HUD has chaired the federal Healthy Homes Work Group (HHWG), comprised of over 10 federal agencies or offices, which has focused on advancing collaborative promotion of, and adoption of, the holistic healthy homes concept through results-oriented activities. In 2013, the HHWG released its strategy and action plan, entitled *Advancing Healthy Housing: A Strategy for Action*, at a public event that included several cabinet-level speakers. Additionally, members of the HHWG participate on other work groups that may address specific healthy homes topics. For example, a number of HHWG members participated on the EPA-chaired Federal Radon Action Plan (FRAP) work group fulfilling agency-specific commitments for reducing radon and related health risks in homes. It is through the FRAP work that HUD was able to achieve a new policy requiring radon testing and mitigation, as necessary, in some multifamily mortgage insurance programs that affect an estimated 100,000 units. The FRAP has evolved into the National Radon Action Plan work group, and now includes other non-federal stakeholders, including the American Lung Association

Another example is HUD's strong relationship with CDC, EPA and other HUD offices on a number of topics, including assistance in encouraging the adoption of, and implementing, smoke-free multifamily housing programs. OLHCHH worked with HUD's Office of Public and Indian Housing to issue a notice encouraging Public Housing Authorities to implement smoke-free policies on their properties.

OLHCHH also collaborates with USDA and other non-federal stakeholders to develop and implement integrated pest management programs and policies.

The Policy and Standards Division in OLHCHH engages in research activities to inform new initiatives and help advance healthy homes concepts. In addition to evaluating existing programs for value, the Division also awards research grants on a number of topics, ranging from analytical method development work to evaluations of intervention effectiveness.

For more information on HUD's work on healthy homes, see: <http://www.hud.gov/healthyhomes>

### **Radon Policies and Information:**

The Housing Office of Multifamily Programs has a policy requiring radon testing and mitigation, HN 2013-03<sup>5</sup>. The FHA informs owners of radon risk through an informational flyer<sup>6</sup>. PIH has a policy that encourages radon testing and mitigation<sup>7</sup>. The Office of Lead Hazard Control and Healthy Homes has a website that includes links to these policies, as well as other helpful information: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/healthy\\_homes/healthyhomes/radon](http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/healthyhomes/radon)

### **Sustainable communities and anti-displacement strategies:**

Concerns around gentrification, disaster-related displacement, availability of emergency housing and redevelopment of HUD-assisted housing were raised frequently by stakeholders. Of particular concern, were HUD efforts to mitigate displacement in its Sustainable Communities Initiative (SCI) work, to promote right-of-return and one-for-one replacement policies in redevelopment contexts and to offer equitable relocation plans.

One of HUD's principal instruments for addressing several of these issues is the Office of Economic Resilience (OER). OER helps communities and regions build diverse, prosperous, resilient economies by: enhancing quality of place, advancing effective job creation strategies, reducing housing, transportation, and energy consumption costs, promoting clean energy solutions and creating economic opportunities for all. The Office administers three grant programs and multiple initiatives to help communities achieve these goals<sup>8</sup>. [Sustainable Communities Regional Planning Grants](#) provided grants to help improve regional planning efforts that integrate housing and transportation decisions, and increase state, regional and local capacity to incorporate livability, sustainability and social equity values into land use plans and zoning. The program supports metropolitan and multi-jurisdictional planning efforts through a consortium-based model that brings together numerous groups to inform the planning process. [Community Challenge Grants](#) enabled communities in fostering reform and reducing barriers to achieving affordable, economically vital and sustainable communities by amending or replacing local master plans, zoning codes and building codes; either on a jurisdiction-wide basis or in a specific neighborhood, district, corridor, or sector to promote mixed-use development, affordable housing, adaptive reuse and similar activities with the goal of promoting sustainability at the local or neighborhood level.

Both grant programs specifically identified social and economic equity as important underpinnings of the initiative. Successful applicants to the grant program were required to demonstrate how they considered the impacts of their planning efforts on the low-income population, communities of color, and other traditionally marginalized communities of interest. In particular, Regional Planning Grantees each completed a Fair Housing Equity Assessment that identified barriers to opportunity for low-income residents and ways to address them.

The [Capacity Building for Sustainable Communities](#) grant program, jointly funded by HUD and EPA, identified intermediaries to provide additional assistance to the recipients of Sustainable Communities assistance from the two grant programs; with one of its primary emphases being

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<sup>5</sup> <http://portal.hud.gov/hudportal/documents/huddoc?id=13-03hsgn.pdf>

<sup>6</sup> [http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_13757.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_13757.pdf)

<sup>7</sup> <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2013-06.pdf>

<sup>8</sup> Both programs ran active competitions in FY10 and FY11. There are no current appropriations at this time.

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addressing equity, equitable development (including development without displacement), and other environmental justice issues.

The results of HUD's investment in SCI that have positive implications for reducing the risks of displacement associated with sustainable development are manifold. Communities across the country have leveraged SCI grant funds to engage affected communities in planning for future investment; produced strategies that promote equitable development, prioritized deep affordability in housing development strategies focused on workforce development and other income enhancement approaches, and developed specific tools to address development without displacement. In Seattle, the City paired more than \$2M in investment in equitable transit investments with an ongoing effort to organize multicultural communities along the rail corridor running through southeast Seattle to slow the exodus of people of color out of the city. Ultimately, the communities agreed that creating a community center, accessible to the numerous immigrant populations in the area, would anchor those peoples in the neighborhood and complement the city's affordable housing strategy.

In Minneapolis/St. Paul, the Metropolitan Council distributed small grant funds to local community-based non-profits to help engage underrepresented communities in using the development of a transit corridor to expand access to jobs, affordable housing and economic development. In New Orleans, the City and residents considered alternatives for the future of an elevated highway and sizeable downtown investment in new biomedical and other facilities through a robust community engagement process that resulted in a signature economic opportunity initiative. Through these and many efforts like them, SCI grantees are developing the next generation of anti-displacement strategies in the communities that need them most. Lessons learned from leading with equity and preventing displacement in these grant programs is now being modeled in the agency's climate and resilience initiatives, most notably HUD's \$1 billion Disaster Resilience Competition, which incorporates elements mitigating displacement risk and attention to marginalized communities in its program requirements.

For more information on The Sustainable Communities Initiative, see: [www.hud.gov/resilience](http://www.hud.gov/resilience)