



September 20, 2019

The Honorable Peter T. Gaynor, Administrator (Acting)
Federal Emergency Management Agency (FEMA)
500 C Street, SW
Washington, D.C. 20472

Dear Acting Administrator Gaynor,

On behalf of the BuildStrong Coalition, we would like to congratulate you and the FEMA team for driving toward implementation of one of the most transformational pieces of disaster legislation in recent memory, the Disaster Recovery Reform Act of 2018 (DRRA). We recognize and appreciate the daunting task facing your organization that will be full implementation of DRRA.

However, we are writing to convey our concerns with FEMA's lack of progress in implementing the core elements of this important bill. We would like to echo the frustration expressed by Congress and other key stakeholders in the slow momentum and absence of a comprehensive approach to the numerous integrated provisions of DRRA that were adopted in 2018.

We understand that these provisions are intended to work together to promote smart actions that reduce risk and remove the many perverse moral incentives that discourage people from driving down disaster costs and losses. As you move toward critical implementation steps, we wish to reemphasize the guiding principles that were incorporated in the legislation and promoted by congressional policymakers during the development and adoption of DRRA. The direction, new authorities, and flexibilities encouraged by DRRA offer a much-needed path forward for fixing our country's broken disaster relief system and investing in a stronger, safer America. The BuildStrong Coalition will continue to be an ardent promoter and partner to FEMA as the agency moves toward complete, comprehensive, and integrated implementation of these new laws, authorities, programs, and policies.

To ensure an effective implementation process, FEMA must:

- Leverage all authorities, programs, and policies to drive better behavior and a smarter approach to all phases of the disaster cycle — from preparedness, to response, to recovery, to mitigation.
- Evolve through the phased-in implementation of new programs and authorities, taking lessons learned to continuously improve program design and delivery to best meet the needs of states, communities, and individuals across the country.

The provisions complementary to DRRA and essential to its overall success contained in the Bipartisan Budget Act of 2018 (signed into law by President Trump in February of last year) cannot be minimized or dismissed. These provisions were the first components of DRRA adopted to incentivize states to implement risk-reducing measures to draw down disaster costs and losses. Specifically, the key provision provides up to an additional 10 percent in federal disaster funds as a reward to states that take measures that will reduce exposures to vulnerabilities identified in their mitigation plans. Not only does this authority allow FEMA to incentivize and reward states for being proactive, it provides an opportunity for FEMA to establish a minimum baseline standard of readiness, preparedness, and mitigation activity toward which states can aim.

Then there are many provisions of DRRA, signed into law nearly one year ago, which work together to address our country's policies and laws that continue to leave lives, homes, and communities vulnerable. Similar to past FEMA mitigation successes, the key advantage of DRRA is its grounding in overwhelming science and evidence.

Better land use, modern science applied to home construction, and increased mitigation measures can dramatically reduce the devastation caused by disasters by as much as an \$11 to \$1 return on investment.

It is imperative that the 2019 iteration of the Pre-Disaster Mitigation (PDM) program further the new authorities and direction gained from DRRA. To simply duplicate previous PDM programs does not align with the direction provided by Congress and squanders the opportunity to provide states with expanded funding and authorities that result in a measurable reduction of risk. These authorities include:

- Articulating expanded eligibility and program flexibility
- Promoting creative projects beyond what the traditional PDM program has funded related to both infrastructure and individual/residential resilience
- Leveraging this funding with current and future streams of disaster recovery funding
- Promoting the implementation of changes at the state and local level that result in significant, lasting impacts on risks and hazards, such as building code adoption and enforcement
- Building a capacity toward the 2020 Building Resilient Infrastructure and Communities Program (BRIC) and allowing the 2019 PDM program to be more BRIC-like for those communities and states that are ready to apply for and implement transformational projects to address disaster risks and hazards

As you work to respond to the multitude of comments and concerns related to BRIC Program development, we know FEMA will remain focused on saving lives, property, and ultimately taxpayer dollars. But FEMA must be purposeful and intent on changing disaster programs and policies — throughout every phase of a disaster — to shift the federal investment away from reactive disaster spending and toward a research-supported, proactive investment in disaster resilience.

In addition to ensuring disaster mitigation remains a federal priority, FEMA should focus on simplifying and streamlining its disaster recovery programs to better interface with state, tribal, and local governments so they can efficiently promote principles of mitigation and resilience. While mitigation will not prevent natural disasters, stronger homes and businesses will save lives, protect private property and federal funds, and guard against environmental damage. Further, building codes contribute to the resiliency of a community and its ability to more quickly bounce back from a hazard event. As communities begin the recovery process, the faster businesses can return to full operation and citizens to their daily lives, the greater chance local economies have to recover and lessen the burden on assistance providers.

Furthermore, to enable greater and more consistent investment in mitigation, DRRA includes provisions that should be incorporated and promoted by BRIC that would:

- Incentivize states to adopt model building codes by providing recovery funds to replace and restore damaged facilities to the latest codes and standards
- Support efforts to reduce risks from future disasters after fires
- Facilitate earthquake-related hazard planning
- Increase state capacity to manage disaster recovery through setting management costs
- Provide expanded funding for individuals and households and greater flexibility to survivors with disabilities
- Grant FEMA the ability to hire and retain a more experienced disaster workforce

The BuildStrong Coalition is committed to supporting and working with FEMA staff on the issuance of the 2019 PDM program, the development of BRIC, and the continued implementation of DRRA. We are invested in FEMA's success in all endeavors that will shift federal dollars away from reactive and ballooning disaster spending and toward research-backed, proactive investment in disaster resilience. BuildStrong is ready and willing to serve as a resource for and promoter of FEMA's efforts.

Thank you for your ongoing engagement.

Sincerely,

Jimi Grande
Chairman
BuildStrong Coalition

Phil Anderson
President
BuildStrong Coalition

Brad Richy
President
National Emergency Management Association

Marty Shaub, CEM
President, International Association of
Emergency Managers – U.S. Chapter

cc:

The U.S. House Committee on Transportation and Infrastructure
The U.S. Senate Committee on Homeland Security and Governmental Affairs
The U.S. House Committee on Appropriations, Homeland Security Subcommittee
The U.S. Senate Committee on Appropriations, Homeland Security Subcommittee