FEMA's National Role in Supporting Disaster Risk Reduction: Areas for Improvement

The most effective way to improve disaster risk management in the United States is to strengthen and optimize the unified, comprehensive National approach to disaster mitigation, preparation, response and recovery. This national strategy, developed by DHS/FEMA in close coordination with State, Local, Tribal, and Territorial (SLTT) jurisdictions and supporting federal agencies, is based on very challenging lessons learned from multiple legacy disaster events, from 9/11 to Hurricane Katrina to Hurricane Helene.

FEMA has a crucial Nationwide mission to coordinate federal agency capabilities and resources when disaster events such as Hurricanes Helene, Milton, the urban wildfires in Maui and Los Angeles, and other catastrophic events quickly overwhelm local capabilities. This requires significant pre-disaster planning that enables timely mobilization of critical resources, often pre-event, where practicable.

To achieve disaster risk reduction and resilience for SLTTs, disaster mitigation must be nationally supported on a continuous, lifecycle process that links pre- and post-disaster risk reduction with effective and efficient risk management that incorporates proven mitigation practices. Rebuilding after an event should prioritize projects that incorporate mitigation and reduce future losses.

The NHMA proposes the following pathways for addressing areas of improvement:

1. Multi-hazard Pre-Disaster Funding Source

Allocate meaningful funding for pre-disaster mitigation efforts, such as retrofitting homes, updating construction codes, improving watershed infrastructure, and reconstructing deteriorated infrastructure to enable future resilience. The lessons learned from disasters like Hurricane Harvey and Hurricane Ian clearly show that pre-disaster mitigation planning and projects substantially reduce recovery burdens. In Texas, jurisdictions that implemented modern floodplain management standards and pre-disaster mitigation projects through the Hazard Mitigation Grant Program (HMGP) and Pre-Disaster Mitigation (PDM) grant program saw significantly less damage and were able to recover more quickly. Similarly, communities in Florida that had engaged in resilient infrastructure investments prior to Ian's landfall were able to recover more quickly and cost-effectively. Investing in resilience upfront will save lives and reduce costs in the long term.

2. Emphasis on Hazard Mitigation and Its Economic Benefits

Invest in hazard mitigation and building permanent local relationships to strengthen disaster response efforts and reduce repetitive losses. Hazard mitigation not only has a proven return on

investment but also contributes positively to local and national economies, providing long-term benefits that far outweigh the costs. Reports from the US Chamber of Commerce[1] and studies such as the *Mitigation Saves* assessments[2] show that every dollar invested in mitigation efforts can save up to $13 in future disaster-related costs. Planning and implementing targeted mitigation projects not only helps communities avoid millions in response and recovery expenses, it also saves lives. Supporting mitigation efforts is fiscally responsible and should remain a priority in national policy, ensuring communities are better prepared for future disasters and are reducing repetitive losses. FEMA's role in providing a national emergency management framework is crucial, but it must be paired with tailored, agile, and well-resourced implementation at the local level.

3. *Federal Oversight for Infrastructure-Related Planning, Project Studies & Project Implementation*

Dedicate a department within FEMA overseeing planning, studies, and project execution to ensure continuity and effective policy implementation for infrastructure-related hazard mitigation. Hazard mitigation planning is a critical foundation for assessing local risks, vulnerabilities, and the frequency of disasters, which inform the development of projects that can reduce risks at the local level. Specific studies conducted in high-risk areas help communities assess local hazard data and evaluate project options to identify the most effective solutions.

Effective mitigation project implementation not only reduces local risk but also builds long-term resiliency. To make this feasible, federal funding policies and processes should be structured to incentivize and prioritize project implementation, and encourage building local capacity for mitigation planning, hazard studies, and project completion over time.

4. *Implement Risk-informed Guidance & Transparent Accountability Frameworks*

Address the growing concern that post-disaster audits are driving recovery strategies instead of proactive planning by shifting the focus towards implementing risk-informed guidance that empowers local and state officials to make timely, confident decisions. Lengthy project review and approval processes are forcing local communities to "pre-execute" the majority of a project during the application development stage, seemingly to prove the worthiness or validity of the project. By establishing transparent accountability frameworks early on, we can reduce fear and hesitation that can paralyze local and state officials from taking timely action, ensuring that recovery efforts remain swift and effective, even in the face of challenges.

5. *Establish a Permanent FEMA Cadre in Each State & Dedicated Staff for Project Lifecycle*

Accelerate post-disaster recovery by implementing a permanent cadre of disaster recovery professionals embedded in each state and by assigning dedicated staff to oversee SLTT recovery projects from start to finish. These experts would offer valuable institutional knowledge,

---

[1] https://www.uschamber.com/security/the-preparedness-payoff-the-economic-benefits-of-investing-in-climate-resilience

[2] https://www.nibs.org/files/pdfs/ms_v4_overview.pdf

expedite project coordination, and build trust with local officials, as assigned federal partners living in each state would have a direct vested interest in the safety, sustainability and resilience for their state, the communities, and its residents. These cadres could also be shared across SLTTs as needed to meet demand, similar to the Emergency Management Assistance Compact (EMAC) system for disaster response. In addition, permanent or long-term staff that are dedicated to managing projects from their formulation to closeout would significantly reduce delays and ensure a smoother and more efficient recovery process, as project continuity often suffers when recovery staff rotate out.

6. Clarify Eligible Mitigation Project Scope and Increase SLTT Management Flexibility

Streamline the Federal Grant Program application and approval processes to offer SLTTs greater authority and flexibility in managing projects and reduce the complexity of implementing recovery or mitigation activities, making it easier for SLTTs to quickly engage when disasters strike as more communities face frequent disasters. Simplifying the application process and providing general approval of project types would empower SLTTs with greater authority and flexibility to manage individual projects efficiently.

While some projects may remain too complex for FEMA to handle directly, especially those that require specialized expertise like the United States Army Corps of Engineers (USACE), focusing on reducing implementation complexity for less complicated activities will enable communities to jump into recovery with the speed and precision they need. A model like the "Swift Current" program can simplify the process, reducing complexity and enabling faster implementation of recovery and mitigation projects. Streamlining and clarifying the scope of eligible mitigation activities can reduce uncertainty at the SLTT level, increase efficiency, and accelerate project execution with appropriate federal oversight to maintain uniformity.

7. Improve Interagency Coordination during Recovery

Convene interagency working groups to enhance coordination across Federal programs in support of SLTT recovery priorities and timelines, resolve recurring program conflicts, develop shared review protocols, and leverage technology-enabled reviews to streamline processes. Digital platforms and shared data repositories will help reduce duplicative efforts and accelerate approval timelines, driving a more efficient recovery process. In addition, clear, defined roles and improved coordination in specific areas, like the Environmental and Historic Preservation (EHP) process, are critical to reducing chokepoints. For example, when multiple federal agencies are involved, ambiguity over who leads the EHP review often delays recovery efforts. Defining clear roles and responsibilities will eliminate these bottlenecks. Therefore, all projects should have an assigned lead agency for EHP reviews and a point of contact from that agency that sees the project through to completion.

This approach aligns with the Executive Order *Achieving Efficiency Through State and Local Preparedness,*[3] which reinforces the importance of reducing complexity, clarifying federal roles,

[3] https://www.whitehouse.gov/presidential-actions/2025/03/achieving-efficiency-through-state-and-local-preparedness/

and supporting risk-informed decision-making. Its call to streamline preparedness operations and revise overlapping policies directly supports the need for designated lead agencies, shared review protocols, and improved coordination—key steps to accelerating recovery and avoiding delays like those seen in past disasters. The recovery from the 2018 California wildfires is a prime example where overlapping responsibilities between FEMA and other federal agencies led to significant delays in disaster recovery and hazard mitigation projects, such as debris removal and infrastructure repair. Improving interagency coordination can minimize these types of delays in future recovery efforts.

8. Conduct Baseline Capacity & Capability Assessments at the State Level

Perform disaster-frequency-informed assessments of each state's emergency management capacity and capability. These assessments should focus on sustained support needs independent of population size, ensuring that high-frequency disaster states receive the resources and planning required to prepare for and respond to emergencies effectively and reduce repetitive losses, as state population and location factors are not necessarily direct indicators of the ability of state level personnel. These assessments would better support more rural based states, which tend to experience higher frequencies of extreme weather-related disaster events, and therefore require more sustained federal support, regardless of their lower population base.

9. Improve the Utility of Hazard Mitigation Plans

Prioritize actionable, locally-tailored Hazard Mitigation Plans (HMPs) that go beyond generic, compliance-driven approaches and encourage integration with land use and capital improvement planning to ensure HMPs are actionable and effective. These plans must be based on specific local vulnerability and risk assessments that enable identification of measurable risk reduction goals and implementable projects that address specific areas of unacceptable risk for each jurisdiction.

Additionally, there need to be provisions for flexibility and a clear pathway for project scoping, especially in high-vulnerability areas where the appropriate solution may not yet be fully defined. This ensures that SLTTs can utilize HMPs to help define and optimize post-disaster recovery and mitigation investments, with or without successful grant applications.

Furthermore, revisit the required regulations to allow for greater local flexibility, incentivizing SLTTs to develop plans that are not only more actionable but also better aligned with the unique needs and capacities of their communities to drive more effective, locally-driven disaster resilience efforts. There is no one-size-fits-all mitigation plan, as each participating jurisdiction will vary in their needs, capabilities, and capacity to implement a solution to their local problems. Using the HMP as a hub to integrate all other planning mechanisms can enable SLTTs to become more resilient for the next extreme weather event.

In summary, to improve our national disaster resilience, FEMA must take a proactive approach—investing in mitigation, building permanent local relationships, and streamlining processes for mitigation and recovery. While FEMA plays a crucial role in providing a consistent national framework for emergency management, it must also be agile, well-resourced, and focused on tailored implementation to effectively meet the challenges of today's increasingly complex disaster risk landscape.

Respectfully,

National Hazard Mitigation Association (NHMA)