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The Association of State Floodplain Managers (ASFPM) is pleased to share our perspective on experiences with the Federal Emergency Management Agency (FEMA) related to our members' flood disaster preparedness, response, recovery, and mitigation experiences. ASFPM is a scientific, professional, and educational organization dedicated to reducing flood losses across the nation. Together with our 38 state chapters, we represent more than 22,000 state and local officials, as well as professionals in the private sector and academia, engaged in all aspects of floodplain management and flood mitigation. Our history of working with FEMA dates back to the creation of the agency. Flooding remains the most frequent natural disaster in the United States, causing the greatest loss of life and property damage. The average annual cost of flooding has doubled each decade since 1990 and is now over [\\$46 billion/year](#). The Joint Economic Committee reported in 2024 that the total annual economic impact of flooding — including infrastructure damage, lost economic output and property losses — costs the nation at least \$180 billion each year.

ASFPM has championed many key FEMA and NFIP reforms over the years. These efforts include the creation and expansion of the Hazard Mitigation Grant Program as part of the 1988 and subsequent Stafford Act reforms; the creation of the Increased Cost of Compliance and Flood Mitigation Assistance programs; and the authorization of the Community Rating System (CRS) as part of the 1994 National Flood Insurance Reform Act. ASFPM also supported hazard mitigation planning as part of the Disaster Mitigation Act of 2000 and FEMA's map modernization program in the early 2000s. Further, the association advocated for strengthening FEMA's leadership, teamwork, and accountability as part of the 2006 Post Katrina Emergency Management Reform Act (PKEMRA), the creation of the National Flood Mapping Program in the 2012 Biggert-Waters NFIP Reform Act, and expanded pre-disaster hazard mitigation in the Disaster Recovery Reform Act of 2018.

KEEP FEMA, FIX WHAT'S BROKEN

Prior to the establishment of FEMA, the federal government's approach to disaster response was highly fragmented, reactive, and inefficient. Federal assistance for disasters depended on individual Acts of Congress that could take weeks or months to complete. The creation of FEMA brought structure, professionalism, and, more importantly, consistency to the nation's disaster management process. The agency's impact on helping communities and disaster survivors in their time of greatest need through the entire life cycle of a disaster — preparedness, response, recovery, and mitigation — has made the nation far more resilient from the impacts of disasters than would be possible if there were no FEMA. Eliminating FEMA would undermine decades of progress in disaster management and community resilience. **ASFPM opposes any proposal to dissolve or eliminate FEMA.**

Today's FEMA is a different agency than when it was first created — an evolution driven by experience and adaptation. Over time, our nation has taken lessons learned from individual disaster events and turned them into meaningful reforms, such as the 1996 National Dam Safety Program Act, the 2006 Post-Katrina Emergency Management Reform Act, and the 2018 Disaster Recovery Reform Act (DRRA). This post-event assessment and adjustment process is not only appropriate policy making, it is also foundational to effective emergency management. In fact, ASFPM has long supported legislation establishing a National Transportation Safety Board (NTSB)-type entity with the authority to undertake performance assessments of all parties (including levels of government) after disasters and to make recommendations for improvement. We do note that within FEMA, there are processes in place to evaluate building performance after disasters, which is a little known, but essential function.

Current calls to reform the Federal Emergency Management Agency are valid. No federal agency or program should be exempt from the need of continuous improvement. However, any such effort must be done with a full understanding of FEMA's vital mission and why it was created in the first place.

Placement of FEMA within the Federal Bureaucracy. Moving FEMA into the Department of Homeland Security (DHS) in 2003 has created unnecessary complexity and hindered the effective delivery of core programs and services. For example, the DHS privacy office has rendered an increasing amount of FEMA data as "personally identifiable information," which severely impacts the flow of essential information. This makes it difficult for communities to update hazard mitigation plans, apply for grants, and even know who their local floodplain manager is. FEMA rulemaking has also suffered under DHS, with some regulations taking more than a decade to finalize — delays that directly affect the agency's ability to implement programs efficiently. Additionally, FEMA has become too involved in DHS functions related to immigration and border control, such as the Shelter and Services Program, which are not part of its core mission.

Re-establishing FEMA as an independent agency with Cabinet-level leadership would allow the Administrator to report directly to the President, better advocate for the urgent needs of disaster survivors, and streamline program delivery. It would also reinforce FEMA's accountability to Congress and the public, and restore its ability to carry out a comprehensive emergency management mission. Re-establishing FEMA's independence would refocus the agency on what matters most: helping communities prepare for, respond to, and recover from disasters effectively and equitably. **ASFPM strongly supports elevating FEMA out of DHS, making it an independent cabinet-level agency.**

KEY FEMA FUNCTIONS AND PROGRAMS TO MAINTAIN AND STRENGTHEN

The National Flood Insurance Program (NFIP). The NFIP is an essential part of how the nation manages flood risk. From 2003 to 2023, 99% of the counties in the United States experienced a flooding event. According to the most recent data available, over 22,600 communities participate in the program, and 4.7 million NFIP policies are in force for \$1.3 trillion in coverage. The NFIP has paid nearly \$80 billion in claims that would otherwise have been disaster assistance costs or unmet needs. The NFIP's approach is unique as a comprehensive flood risk management program that is based on four equally essential pillars: floodplain identification and mapping, flood insurance, floodplain management regulations, and flood hazard mitigation. These complement FEMA's broader emergency management mission and the key phases of emergency management: preparedness, response, recovery, and mitigation. For example, floodplain mapping is useful in preparedness activities like tabletop exercises, response activities such as evacuation, and recovery and mitigation efforts. Floodplain management regulations and flood insurance have important roles in preparedness, recovery and mitigation. It is for these reasons that **ASFPM supports keeping the NFIP intact and within FEMA.**

ASFPM realizes though that the NFIP needs long-term reauthorization and reform. We have identified [over 75 NFIP reforms](#), including many which also meet the overarching priorities of the Administration of government accountability in making programs more efficient and effective such as flexibility using flood mitigation funding, making Increased Cost of Compliance more effective, and reducing disaster costs and making the cost of home ownership more affordable through better floodplain management standards. We also propose making the program as a whole more transparent.

Floodplain Mapping: Critical to the entire cycle of Emergency Management. FEMA's national flood mapping program identifies flood hazard areas for states and communities. The National Flood Insurance Act mandates that FEMA identify, review, update, and publish flood hazard information for specific areas. These areas include those within the 100-year and 500-year floodplains, areas with residual flood risk, areas at risk from flood control structure failures, and areas protected by mitigation features. FEMA also is required to establish flood-risk zone data and estimate potential flood-related losses in these areas.

While progress has been made, only one-third of the nation's coastal and riverine miles have been mapped, leaving thousands of communities across the country without the basic and reliable information they need to make wise development decisions. Developed initially for supporting insurance and community development, FEMA's flood maps also provide essential flood risk information for emergency management and the rest of our society. For decades, Congress has made it a priority to appropriate funding that supplements resources that come from the NFIP itself to maintain and update flood maps. Further, the program has evolved over the years to allow for state or even regionally-led flood mapping efforts through the Cooperating Technical Partners (CTP) program in keeping with the Administration's desire to put states and communities in control.

FEMA is currently in the process of developing its next-generation process for flood mapping called the Future of Flood Risk Data (FFRD). This initiative provides a more comprehensive picture of the country's flood hazards and risk by leveraging new technologies to include more efficient, accurate, and consistent flood risk information across the nation. The first watershed maps are in review and the rest of the country will be mapped in subsequent years. Updated flood risk data effectively informs stakeholder decision-making, drives crucial actions to mitigate flood risk, and improves FEMA's understanding of stakeholder needs.

FEMA's Hazard Mitigation Mission. Hazard mitigation is the most effective way to drive down future disaster costs as well as save lives, property and livelihoods. Mitigation techniques, such as elevating, relocating, or buying out flood prone buildings are all proven methods for reducing risk. Two different reports, [a 2024 report by the US Chamber of Commerce](#) and a [2019 report by the National Institutes of Building Sciences](#) show that investments in hazard mitigation are cost-effective and can save up to \$13 in future disaster costs for every dollar spent. It is increasingly recognized that hazard mitigation is a practical and immediate way to control the rising costs of both disaster assistance and property insurance that is necessary for the nation's real estate markets and lenders for housing to remain affordable. Despite these benefits of hazard mitigation, it represents only a paltry 5% of Disaster Relief Fund (DRF) obligations from 2000-2020, while Public Assistance (PA - or disaster assistance for infrastructure) represents 53% of DRF funding and Individual Assistance (IA - or disaster assistance for individuals) represents 19% of DRF funding, according to a [recent Congressional Research Service report](#). Over the 1992–2021 period, budget authority appropriated for the DRF totaled \$381 billion according to the Congressional Budget Office.

Hazard mitigation must continue to be made available both pre- and post-disaster to meet communities and property owners when they are ready to undertake these measures. In reality, it is only after a disaster that we find most property owners willing to take long-term actions to reduce risk — which is why the President authorizing the post-disaster Hazard Mitigation Grant Program is so vital. Further, applying mitigation measures to our infrastructure and lifelines is essential given the high percentage of overall DRF expenditures that go toward infrastructure repair. Curtailment of hazard mitigation for infrastructure (§406 mitigation) is not only unwise, but will end up costing the federal government (and taxpayers) more in the long run.

While hazard mitigation programs provide significant benefits to communities and their residents, there is certainly room for improvement in their delivery. Mitigation programs should be more state-centric and locally driven, thus speeding up program delivery. Waiting 3-5 or more years for mitigation to actually happen is unacceptable.

Ideally, hazard mitigation programs would be structured to incentivize states to make their own investments in hazard mitigation, including complementary state hazard mitigation programs (which would operate with or without federal disaster declarations), tax incentives, and adopting/enforcing the latest hazard resilient building codes and standards. Another incentive approach would be to establish a Public Assistance Disaster deductible that rewards states and communities to invest in timely maintenance and more survivable public facility designs and to take measures such as advance mitigation planning to improve their resiliency. These efforts would then result in a lower state/local cost share for post disaster PA projects. ASFPM supported the concept of a PA deductible when it was proposed by FEMA in 2017.

Providing pre-disaster mitigation funding (e.g., BRIC) as a block grant or state allocation could also reduce program complexity and accelerate the implementation of projects. The funds could flow in one unified program to states and prioritize projects identified in state and local hazard mitigation plans. Access to these funds could be tied to state performance, thereby meeting Stafford Act criteria. This would use the incentive of the mitigation funds to build state capability and unify mitigation programs to make them easier to administer. Additionally, grant delivery bottlenecks like Environmental and Historic Preservation (EHP) review could also be delegated to the states, and funding for these additional state responsibilities could be supported out of the unified program funding allocation, allowing states to retain experienced staff. FEMA could also manage a portion of the BRIC funding (say 25%) that could be reserved for a nationwide competitive grant program to advance major and innovative projects.

Ultimately, these changes could shift FEMA's primary role in hazard mitigation to oversight and holding states accountable. That being said, these changes must be done thoughtfully and in an appropriate timeframe so states have time to prepare.

Disaster Preparedness, Response, and Recovery. There is a common misconception that FEMA works as the nation's first responder. In reality, other than in times of catastrophic events, FEMA's most significant contributions lie in preparedness and recovery. Although at times FEMA is called upon to deploy its disaster response capabilities, its broader mission includes supporting and coordinating efforts before and after emergencies occur. (An excellent, in-depth discussion of FEMA's response role in catastrophic events can be found in [2009 testimony](#) by former FEMA Administrator Craig Fugate).

FEMA's disaster preparedness roles include training emergency managers and first responders, hazard mitigation and disaster response planning, exercises, coordinating across agencies and levels of

government, community engagement, private sector preparedness, research and evaluation. ASFPM is particularly concerned about the recent erosion in FEMA's training capacity, including the severely impacted role of the Emergency Management Institute (EMI). EMI plays a vital role in training first responders, emergency managers, floodplain managers, and state dam safety staff in key elements of their jobs. Functionally, preparedness for FEMA also means ensuring the agency is well-staffed and has adequate personnel in its disaster cadres. The volume and pace of disasters in recent years has led to chronic understaffing, which has been noted in previous reports by FEMA's National Advisory Council. Finally, ASFPM strongly opposes any efforts to eliminate the National Dam Safety Program as reauthorized by the Water Resources Development Act of 2024 and the High Hazard Dam Rehabilitation Grant program authorized under the Water Infrastructure Improvements for the Nation Act of 2016. Although these programs fall outside the Stafford Act, they are nonetheless essential preparedness programs authorized by Congress for FEMA to administer. As our nation's dam infrastructure ages, we are reminded by high profile dam failures that the costs and consequences of this type of disaster can be catastrophic.

During disaster recovery, one of FEMA's most critical roles is coordinating federal resources, including specialized resources from as many as 30 other federal agencies that can support state, tribal, territorial and local efforts. This includes highly specialized equipment, technical expertise, and the ability to procure and coordinate a significant amount of lifesaving supplies in a short timeframe. Following major disasters, FEMA provides federal grants to individuals and families to assist with temporary housing, emergency home repairs, and other disaster-related expenses. FEMA also supports the Public Assistance Program, which provides funding to support efforts to repair or reconstruct public infrastructure or facilities damaged by a disaster.

Any changes to FEMA and its programs should be underpinned by two realities: 1) By definition, federal disaster declarations occur when local and state resources are overwhelmed. Therefore, there will always be a need for a fully equipped and functional FEMA. This is especially true during catastrophic events. 2) State capability to effectively handle disaster events will ebb and flow over time and it is infeasible and inefficient to maintain capacity in every single state and territory to handle every single disaster event, including catastrophic ones.

In conclusion, we hope that the FEMA Review Council will work together to enhance FEMA's important role. We also note and support many of the practical ideas for FEMA reform put forward last month by Rep. Chuck Edwards, a Council member, in his [Hurricane Helene Recovery Report](#). As natural disasters become more frequent and severe, FEMA's ability to respond effectively and serve survivors must be strengthened — not diminished. Investing in FEMA's core hazard mitigation and resilience programs is among the most cost-effective steps the federal government can take to reduce disaster costs, protect lives and property, and support state and local governments.

Although capable states and communities can and should shoulder more responsibility, FEMA's leadership and resources will always be necessary, particularly for catastrophic disasters. Any reform or budgetary decision must preserve, and ideally enhance, FEMA's customer service capacity and ensure the agency is equipped to support the nation in times of greatest need.

We appreciate the opportunity to share our recommendations and look forward to working with the Council as you proceed with your review of FEMA's role and functions. Please contact ASFPM Executive Director Chad Berginnis with any questions at CBerginnis@floods.org or (608) 828-3000.