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Director, Vermont Emergency Management**

STATEMENT FOR THE RECORD
On behalf of the
National Emergency Management Association

**Submitted to the House Committee on Transportation and Infrastructure
Subcommittee on Economic Development, Public Buildings, and Emergency Management**

FEMA Priorities for 2022; Stakeholder Perspectives

February 16, 2022

National Emergency Management Association
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Thank you, Chairwoman Titus, Ranking Member Webster, and distinguished members of the Committee for allowing me to testify today.

I am proud to represent the National Emergency Management Association (NEMA). NEMA represents the state emergency management directors of all 50 states, territories, and the District of Columbia. As Director of Vermont Emergency Management and on behalf of my colleagues in state emergency management, we thank you for holding this discussion on recommended priorities of the Federal Emergency Management Agency (FEMA) in 2022.

The relationship between federal, state, and local emergency management is unique in that each maintains separate authorities and capabilities but must rely on one another to save lives and protect property. State emergency management relies on the strength of our locals, so the success of FEMA is also determined by the strength of the states. The relationship between state and federal emergency management is sometimes stressed, but no disagreement cannot be overcome by understanding each other's priorities, remaining flexible, and maintaining the shared goal of focusing on disaster survivors. The ongoing COVID-19 pandemic response and recent change in administration gave the NEMA membership several opportunities to address continuous improvements with FEMA and we welcome the committee to this discussion as we look to 2022.

The state emergency managers applaud the recent strategic plan developed by FEMA and look forward to working with Administrator Criswell during implementation. To that end, many of the priorities outlined in this testimony can find congruency with the goals and objectives of the strategic plan.

STREAMLINING AND COORDINATING FEDERAL PROGRAMS

In partnership with the states, FEMA should pursue a comprehensive review, re-envisioning, and reform of emergency management policies and regulation to provide more flexibility for emergency managers to navigate increasingly complex challenges faced in a rapidly changing environment. Threats such as the ongoing pandemic, cybersecurity, climate change, infrastructure failures, and continuing natural hazards requires a streamlined and coordinated federal approach.

As a part of this re-envisioning, FEMA should conduct a review of headquarters-versus-regional decision-making roles and authorities to aid in streamlining and consistency. The relationship between FEMA headquarters and the regions must result in a common, fair, and equitable application of policy, guidance, and regulations across the country. COVID-19 demonstrated many of the shortcomings in the existing disconnect between FEMA headquarters and the regions. Throughout the pandemic states and FEMA Regions struggled to interpret guidance changes regarding eligibility of response activities and interpretation of these policies often differed from Region to Region. For example, the eligible uses of PPE depending on type of facility and occupation utilizing the PPE was very difficult for applicants to decipher and continues to be an issue throughout the country. Public Assistance program guidance assumes impact from disaster caused by natural hazards and it is often difficult to apply to other disasters such as pandemics or cyber-attacks. Simplifying guidance as well as interpretation to be as straightforward as possible will lessen the administrative burden on applicants as well as FEMA and will cost taxpayers less wasted time in fruitless deliberations.

NEMA recently approved three position papers that address other aspects of federal coordination and policy implementation. Submitted with this testimony to be entered into the Congressional Record, these papers address the following:

1. *Coordination of State Homeland Security Grant Program Guidance.* As emergency management and homeland security professionals, the membership of NEMA appreciates the need for grant programs to remain dynamic and meet emerging threats. FEMA and the department must develop a more collaborative process, however, to devise, evaluate, and implement proposed changes. Therefore, FEMA should encourage DHS to establish a codified review process for grant guidance that is properly vetted through the appropriate stakeholders.
2. *Interagency Collaboration.* With the continued maturation of the Cybersecurity and Infrastructure Security Agency (CISA), the need for collaboration with FEMA is paramount. Whether addressing cybersecurity threats or critical infrastructure protection activities, FEMA and CISA must work closely in the development of policies and regulations. An Integrated Program Office (IPO) seems the best logical way to ensure such policy is integrated, coordinated, and clarified for those charged with saving life and property in the response to a major event. This would further serve as an opportunity to coordinate policy and avoid negative consequences prior to major events through better integration at the federal level.
3. *Wildfire Policy.* Recent wildfires exposed gaps in assistance and flaws in the interpretation of existing policy. Leveraging federal grants for response or mitigation efforts becomes problematic when they do not have adequate allowances for some of the unique needs of fighting wildfires. In the long-term approach, state and local land managers can be proactive in lessening threats to communities, while federal land managers struggle to implement meaningful fuels reduction projects near communities. In total, there would be great benefit to federal agencies taking a more active role in protecting communities before, during, and after wildland fires originating on federal lands. The paper includes a robust set of recommendations touching nearly every aspect of FEMA response and recovery programs.

ADDRESSING EQUITY IN EMERGENCY MANAGEMENT

Disasters are indiscriminate in their impact. They do not distinguish between party affiliation, arbitrary borders, or income level. Emergency management programs and policies in this nation must recognize these qualities and evolve to meet the needs of all Americans. NEMA embraces the priorities outlined in the FEMA strategic plan to address equity in emergency management programs. This year the association created a new policy committee to address diversity and equity issues. FEMA can aid in this national effort by addressing, supporting, and cultivating an inclusive and diverse workforce representing the diversity of communities impacted by emergencies. This includes removing barriers inhibiting vulnerable and underserved populations from applying for and receiving aid after a disaster. The federal government should implement a universal application at the federal level for all disaster assistance programs, creating a more equitable and less burdensome process for survivors already experiencing some of the hardest times in their life.

Furthermore, NEMA encouraged FEMA to create a formalized process by which to evaluate whether existing or new disaster and non-disaster grant programs increase or decrease equity for disaster survivors, and do not aggravate any financial and social disparities that may exist prior to the event. In addressing these goals, however, FEMA should use caution in guarding against unintended consequences that could inadvertently reduce or limit assistance to those in need.

For example, layering additional grant requirements to address equity concerns can become an equity issue by applying a one-size fits all approach to all states and assuming all states have the same resources to meet additional grant requirements. We remain encouraged by FEMA's forwarding-leaning approach to garnering feedback for the preparedness grant programs and expect clear objectives to be outlined to address known equity challenges within the program themselves.

SIMPLIFY FEDERAL RECOVERY PROGRAMS

The ongoing response to COVID-19 and other, overlapping events presented a tidal shift in the view of emergency management at all levels of government. But where issues may arise during response, the true test of our capabilities and resiliency as a nation come in the recovery process. The past two years revealed several issues FEMA should address in 2022 and beyond, including:

- Working with the administration to clarify, improve, and add capacity to support the agency's role in long-term recovery. They should be the coordinating agency on behalf of the federal government with the authority to support federal functions across the disaster recovery spectrum.
- Raising the small project threshold of the Public Assistance program from \$131,100 to \$1 million, thereby reducing the complexity of recovery and expediting recovery dollars to disaster survivors. If FEMA remains unwilling to effect this change administratively, NEMA reiterates our support of H.R. 5641, the SPEED Recovery Act, introduced by Representative Graves.
- A review of the authorities, roles, and responsibilities of Consolidated Resource Centers (CRC). Originally intended as processing centers, CRCs morphed into bottlenecks in the recovery process, circumventing decisions made by Federal Coordinating Officers, and slowing processing of recovery funds at headquarters.
- An evaluation of the Individual Assistance (IA) Program to include eligibility indicators, funding amount, processes, and speed of resources to disaster survivors. IA should maintain a focus on the beginning of a disaster and a whole community approach in meeting the objectives of the needs of individuals.
- Immediately beginning the process of amending 44 C.F.R. Part 207 to allow for the rollover of management costs from one disaster to the next. This would provide each state an unfunded grant for both the Public Assistance Program and Hazard Mitigation Grant Program. It would also allow remaining funds after the close-out of a disaster to be available to build recovery and

mitigation capacity at the state and local levels, and more expeditiously close-out remaining disasters which may be more complicated and build resilience for the next disaster.

- A clarification of the challenges experienced by states as it relates to the sharing of personally identifiable information (PII) in the IA National Flood Insurance programs. FEMA should create a standardized information sharing form which disaster survivors can sign to allow the pertinent recovery agencies with identified resources or program support to receive their information.

INTEGRATING CLIMATE ADAPTATION PRIORITIES

Adapting to the more complex weather we experience and the consequences that come along with it require flexibilities to emergency response systems. Current programs lack the adequate guidance and support which helps manage these new extreme climate disasters. FEMA needs to strategically identify, prioritize, and invest in climate resilience projects that help reduce future losses. This would include coordinating interagency investments for consistency, efficiency, and maximum return.

In addition to a review of current programs through a more climate-conscious lens, FEMA should ensure the utilization of all reasonable and pertinent federal partnerships to achieve relief and recovery from all aspects of a disaster. This coordination of climate change relates to mitigation, preparedness, response, and recovery programs with other federal agencies – including risk, vulnerability, and consequence assessments. In doing this, FEMA must guard against simply adding “climate change” into existing guidance, verbiage, and doctrine. Efforts outlined at the federal level must be measurable to include benchmarks to determining success. Furthermore, program eligibility must incorporate the full spectrum of disasters exacerbated by climate change including wildfire and drought. Only through a whole-of-government approach can FEMA allow for adequate capacity to respond and with a focus on information sharing, it will allow programs to properly provide relief to victims as they work to recover.

CONCLUSION

On behalf of the state emergency managers, thank you again for holding this hearing on where FEMA should focus in the coming year. Collectively, emergency managers believe we must work together in building our respective capacities to respond, enhance equity in state and federal programs, and streamline FEMA programs to get assistance more quickly to the people who need it most. We can accomplish this by working together across all levels of government and ensuring the role of emergency management is clear regardless of the hazard. In doing all this, we look forward to continuing the strong relationship we have with this committee and with FEMA, and I welcome any questions.

**NATIONAL EMERGENCY MANAGEMENT ASSOCIATION
HOMELAND SECURITY COMMITTEE
POSITION PAPER**

DATE: January 10, 2022

SUBJECT: State Homeland Security Grant Program Policy Changes

DISCUSSION:

The basis of the State Homeland Security Grant Program (SHSGP) pre-dates the terrorist attacks of September 11, and the Urban Area Security Initiative (UASI) came about shortly after the creation of the Department of Homeland Security in 2003. These two programs form the cornerstone of preparedness funding for states and locals to address emerging and dynamic threats to the homeland. They support the building, sustainment, and delivery of core capabilities in states, territories, urban areas, and local and tribal governments and to develop a more secure and resilient nation.

These programs represent a partnership between states and locals to aid the federal government in their mission to close nationwide preparedness gaps. In 2018, the National Homeland Security Consortium conducted a study to evaluate the past investment of funds on terrorism preparedness, the augmentation of that funding by federal assistance, and what capabilities states, and localities now have that were not available pre-2001. To collect this information, a survey was issued to all 50 states and to jurisdictions from 50 urban areas currently and formerly eligible for UASI funds to determine how much money has been invested by state and local governments.

A key finding from the survey is that for every SHSGP and UASI grant dollar invested, the median return was \$1.70 for responding state emergency management and homeland security agencies; for local emergency management and homeland security agencies, it was \$0.92. Furthermore, return on investment also generally increased when considering other jurisdictional agencies that were involved with, but not responsible for preparedness activities.

In recent years, administrations waited until the completion of the appropriations process and the Notice of Funding Opportunity (NOFO) to roll-out proposed programmatic changes to the SHSGP and UASI programs. An example of these proposed changes includes a requirement for certain percentages of funding to meet core priorities. Furthermore, in 2020 the department “banded” states based on threat which fundamentally altered the funding formula for states. While the department ultimately sidelined these proposed changes primarily due to the continuing response to COVID, they reflect a repeated pattern of attempts to change the rules during the application process.

As emergency management and homeland security professionals, the membership of NEMA appreciate the need for these programs to remain dynamic and meet emerging threats. The department must develop a more collaborative process, however, to devise, evaluate, and implement proposed changes. The planning process for grant funding typically takes several years, so the 45-day window of a standard NOFO is wholly inadequate to affect smart and effective changes. Also, with a multi-year performance

period for the grant, changing the national priorities in the middle of the period means states and locals cannot achieve or sustain impactful progress.

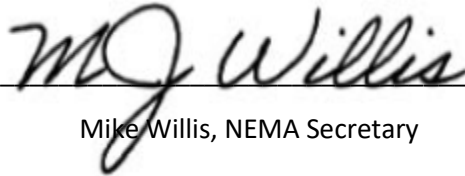
RECOMMENDATIONS:

1. DHS should establish a codified review process for grant guidance that is properly vetted through the appropriate stakeholders. Organizations such as NEMA, the National Homeland Security Consortium, or National Advisory Council are natural partners in such an effort.
2. Completion of the review and concurrence should occur not less than 12 months from the end of the previous fiscal year to give grantees adequate time for planning adjustments.

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Second: Chris Stallings, Georgia

DISPOSITION: Passed Unanimously

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Mike Willis, NEMA Secretary

**NATIONAL EMERGENCY MANAGEMENT ASSOCIATION
HOMELAND SECURITY COMMITTEE
POSITION PAPER**

DATE: January 10, 2022

SUBJECT: CISA-FEMA Integrated Program Office

DISCUSSION:

With the reorganization of the Cybersecurity and Infrastructure Security Agency (CISA) and awarding the agency operational status, the Department of Homeland Security (DHS) created an agency focused on protecting critical infrastructure and assisting the nation in enhancing cybersecurity. The unintended consequence of this new organization, however, is the separation of mission of critical infrastructure protection and the response and recovery mission of the Federal Emergency Management Agency (FEMA). Despite the organization separation within the department, these mission sets are inextricably linked in policy.

For response and recovery functions after a natural or man-made physical disaster, the Federal Emergency Management Agency (FEMA) is a logical state partner with regional personnel, grant structure, and experience in consequence management. After a cyber-incident, with or without a physical impact, state and local governments and the private sector look to CISA for support. Naturally, CISA needs FEMA and vice versa in both policy development and practical application of response capabilities. This reliance among DHS components, however, can cause barriers to reasonable and appropriate response time and action.

For example, throughout the stakeholder community, questions abound relating to the federal government's processes for responding to major cybersecurity attacks. Preparedness, response, and recovery functions for such events work together with one another, therefore so too should federal policy and operations. Furthermore, the recently passed Bipartisan Infrastructure Framework included \$1 billion over the next four years for a cybersecurity preparedness grant. As this new grant is brought online, collaboration will be required between CISA as the subject matter experts and FEMA as the department's grant-making entity.

An Integrated Program Office (IPO) seems the only logical way to ensure such policy is integrated, coordinated, and clarified for those charged with saving life and property in the response to a major event. This would further serve as an opportunity to coordinate policy and avoid negative consequences prior to major events through better integration at the federal level.

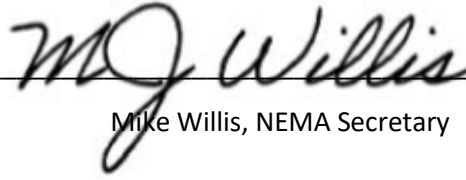
RECOMMENDATIONS:

1. DHS should establish IPO, modeled after those at the Department of Defense, between FEMA and CISA. The mission of this office would be to coordinate all policy and response doctrine as it would apply to cybersecurity, critical infrastructure protection, and any other subject of shared interest.

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Second: Chris Stallings, Georgia

DISPOSITION: Passed
ABSTAIN: Florida

Authenticated: _____

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Mike Willis, NEMA Secretary

**NATIONAL EMERGENCY MANAGEMENT ASSOCIATION
RESPONSE AND RECOVERY COMMITTEE
POSITION PAPER**

DATE: January 2, 2022

SUBJECT: State Emergency Management Wildfire Hazard Recommendations

DISCUSSION:

In 2020, 58,950 wildfires burned 10.1 million acres, the second-most acreage impacted in a year since 1960.¹ According to the U.S. Department of Agriculture Forest Service, recent increased fire activity is due to at least four factors: increasingly hot and dry summers; stronger winds; insect and disease infestations; and human population growth in the Wildland Urban Interface.

Wildfires cannot be viewed as merely a fire service function of first responders. As these fires continue to spread and have broader impacts, they become a whole-of-community hazard which must be treated as such to include robust prevention activities. To understand wildfires, one must first understand forest management, drought, and the interplay with existing programs at the Federal Emergency Management Agency (FEMA). NEMA would not recommend creating new, hazard-specific programs; existing programs within response, recovery, and mitigation could be tailored to meet the evolving wildfire threat.

Leverage Federal Partnerships. The United States government owns around 640 million acres of land across the Nation. The Bureau of Land Management, Forest Service, Fish and Wildlife Service, and the National Park Service own 94 percent of that total². Each wildfire that burns on federal land presents cascading effects that impact local, tribal, and state government, so policy coordination and land-use agreements are critical prior to heightened wildfire activity to ensure there are no delays in recovery due to ownership issues.

Recommendations:

1. FEMA should engage earlier, facilitate the integration of non-natural resource/non-firefighting federal agencies into wildfire risk reduction, response, and recovery planning and operations, and take a stronger role in interagency coordination for the federal government in multi-agency incidents across all phases of a wildfire, including recovery.
2. FEMA should have the authority to work with and help direct those federal agencies that own and manage land to reduce wildfire risk and recovery from wildfires that impact local, tribal, and state-owned lands. This should include coordinating and directing with agencies whose missions are to sustain environmental and energy resources on risk reduction and recovery planning and operations.

Declaration Criteria and Incident Period. Unlike events that are predictive and leave specific damages, wildfires are unpredictable, overlapping, and often combine with one another. Current policies dictating

¹ Congressional Research Service, IN FOCUS, September 8, 2021.

² Congressional Research Service, Federal Land Ownership: Overview and Data, February 21, 2020.

the establishment of an incident period are not conducive to this type of hazard across multiple jurisdictions and authorities. Currently, if a federally declared Fire Management Assistance Grant (FMAG) burns in more than one county, FEMA requires all counties to meet declaration criteria independently. This creates inequity in recovery initiatives for counties that were damaged by the fire but may not reach the threshold for assistance. Furthermore, the declaration criteria used for Individual and Public Assistance disasters are not well-suited for informing fire declaration decisions as they do not consider the full range of impacts of large fires on the diverse local, and especially rural, communities and states.

Recommendations:

1. Revise declaration criteria to qualify the initial attack of a wildfire for emergency protective measures once the National Geographic Area Coordination Center (GACC) or the National Interagency Fire Center (NIFC) reach Preparedness Level (PL) 5.
2. Revise declaration criteria to consider statewide impacts including ongoing firefighting incident instead of only localized impacts.

Prepositioning Deployments. When preparing to fight wildfires, one of the most valuable capabilities is that of prepositioning firefighting assets. Currently, pre-deployment through a FMAG is limited to out-of-state resources.

Recommendation:

1. Allow the state to utilize FMAG assistance for the prepositioning of in-state resources for wildfire response, including the pre-staging of firefighting resources to prevent fires from reaching the severity where an FMAG is needed.

Emergency Work and FMAG Eligibility. Large fires expose burn scars to erosion from wind and soil saturation that most often lead to landslides and mudslides. The federal firefighting services recognize this hazard and take emergency protective measures to protect property within their jurisdiction under the Burned Area Emergency Response (BAER) and the Emergency Stabilization and Rehabilitation (ESR) programs. Similar emergency stabilization measures taken by state and local governments are eligible Category B measures under FEMA Public Assistance (PA) declarations. In managing an FMAG, however, emergency protective measures outside the FMAG incident period are ineligible, putting additional strain on state and local resources. Furthermore, the provision of funding for FMAGs is authorized by linking the authorities of the Stafford Act Section 403 *Essential Assistance* within Section 420 *Fire Management Assistance*. Section 403 is also the section that authorizes the provisions of funding in the FEMA PA program despite being authorized under the same section of the Stafford Act and with identical definitions of entities eligible to receive assistance.

Recommendation:

1. FMAG program guidance should mirror the same eligibilities and timeframes for emergency work as those found elsewhere in the PA program.
2. FEMA should revise the FMAG policy, program, and regulations to include the same categories of eligible applications under the PA programs.
3. FMAG project on-line project tools should include a portfolio of best practices and lessons learned.

Public Assistance Program and Policy Guide (PAPPG) Modifications. Current language of the PAPPG disproportionately favors other hazard events (such as floods, tornadoes, and hurricanes) with little regard to the unique qualities of wildfires. For example, when considering wildfire damage to trees, the current guidance specifically covers tree damage typically realized from wind and hurricane force wind but does not provide guidance on wildfire effects such as tree burns³.

Recommendation:

1. FEMA should update the PAPPG to include wildfire-specific challenges such as debris removal emergency protective measures and the toxicity that is left behind when a wildfire moves through a community including the contamination of drinking water resources.

Leverage the DRRRA. Wildfires dramatically alter the terrain and ground conditions of the affected area. Communities impacted by wildfire may be at an even greater risk of flooding and mudslides. Thus, the Disaster Recovery Reform Act (DRRA) made clear that post-wildfire mitigation efforts to avoid future damage, hardship, loss, or suffering in any area affected by a wildfire (like activities that avoid flooding and landslides) are eligible for funding.

Recommendation:

1. FEMA should utilize the flexibility afforded in the DRRRA to the maximum amount possible and apply the same criteria used by other federal agencies for approving soil stabilization and reseeded projects on non-federal land when post-fire mitigation funds are used.

Hazard Mitigation Grant Programs (HMGP) Evaluation. Through HMGP, FEMA could leverage the programs that fall under grants to be more inclusive of the wildfire hazard. There is a very short timeframe between fire season and flood season, especially as the fire season is quickly becoming a year-round hazard. The Building Resilient Infrastructure and Communities (BRIC) grant program is one example that can elevate such fire mitigation projects. Another example FEMA could use to elevate their mitigation tactics is in evaluation of community programs.

Recommendation:

1. Expand the HMGP performance periods to assist in expediting mitigation projects.
2. Leverage programs such as BRIC and home hardening projects to enforce more sustainable mitigation programs for wildfires.
3. FEMA should accept pre-identified, pre-vetted 'packages' for home hardening that can be easily and rapidly replicated to achieve meaningful and timely risk reduction.
4. Allow fire districts to have the same leeway as Private Non-Profits (PNPs) to receive HMGP funding.

Benefit Cost Analysis (BCA) criteria adjustments. The current BCA for hazard mitigation assessments is linear and disproportionately weighs the financial impact of loss, such as the dollar value of a property or asset. The BCA to a lesser extent considers socioeconomic vulnerabilities and other non-financial factors that contribute to risk. In addition, BCAs are among the largest technical barriers to entry for many economically disadvantaged rural communities that seek to conduct basic wildfire mitigation

³ PAPPG, V4 2020, p. 102

measures. Data collecting has advanced to the point where there is enough national data on defensible space project costs and benefits to determine basic thresholds and criteria.

Recommendations:

1. FEMA must evaluate current BCA criteria and adjust accordingly to consider the broader range of factors, ensuring prioritization of projects based upon new BCA criteria to address highest priority needs and optimize greatest return on investment.
2. Establish a BCA pre-calculated benefits criterion for common defensible space mitigation projects.
3. Ecological and societal health, carbon sequestration, improved water quality, and lessening disaster impact on traditionally underserved communities should be factors that contribute to the BCA.

Wildland Urban Interface (WUI) Considerations. WUI is the space where development of communities meets wildland vegetation. As an establishment may be considered for pre-calculated benefits criteria, defensible space activity proposals in pre-determined WUI areas that meet the National Environmental Policy Act (NEPA) Categorical Exclusions N11 and adhere to basic Firewise-like standards should automatically be deemed cost-effective if its project is below an established threshold amount.

The current HMA programmatic guidance prohibits actions related to improving or increasing water supply in high-risk wildfire areas, based on the premise that these actions constitute preparedness or even response support rather than mitigation. Water utilities and special-purpose districts serving WUI neighborhoods need encouragement to upgrade and expand their storage and delivery systems to accommodate and support wildfire threats, including the purchase and installation of dry-hydrants and heli-hydrants in extreme-risk areas. Current HMA guidance already allows for other wildfire-related upgrades and expansions of WUI water systems (such as installing back up power generators on wellheads and retrofitting system components with ignition-resistant materials) and could easily be broadened within programmatic guidelines.

Recommendations:

1. Establish pre-calculated benefits criterion for WUI areas for defensible space activity proposals that would align with the established BCA pre-calculated benefits criterion.
2. FEMA should reconsider the interpretation that improving water supply in high-risk wildfire areas is not a measure for mitigation, especially given the ever-worsening water availability situations in areas with extreme wildfire risk profiles.
3. Provide WUI projects a more streamlined approach utilizing collected data to help implement a full review and expansion on NEPA categorical exclusions where necessary to hinder administrative delays.
4. Expand the eligible wildfire project types to include water availability upgrades in WUI areas.

Expedite Environmental and Historic Preservation (EHP) Reviews. EHP reviews have become lengthy specifically for Hazard Mitigation Assistance (HMA) wildfire mitigation proposals. This is often due to the lack of applicable NEPA Categorical Exclusions, which leads to needing full environmental assessments that can take at minimum a year or more to complete. This process may result in the delay of simple targeted pruning and thinning in rural-residential neighborhoods; or planting native samplings on a

burned hillside. These administrative delays impact these communities that need simple mitigation tactics quickly.

Recommendations:

1. Conduct a full review of the EHP processes to explore metrics for all mitigation projects to be processed more expeditiously.
2. Allow creative approaches and/or reductions to cost share, as well as flexibility in the grant application timeframe, particularly for disadvantaged communities.

Conclusion. Wildfires are a threat that are year-round and persistent across most of the Western United States but is certainly no longer exclusive to this region as Florida, Georgia, Alabama, Tennessee, and other states east of the Mississippi River also experienced large wildfires in recent years. We are seeing increasingly large and severe wildfires; drought conditions, low reservoir levels, and parched landscapes; and stress on the electric grid due to extreme heat. These challenges are interconnected and cannot be looked at, or responded to, in isolation, yet FEMA's policies and response strategies have not evolved with the hazard. These shortcomings can be resolved by a recognition of the unique threat posed by wildfires, the need for adaptive policies, and a whole-of-government approach to finding solutions. The state directors of emergency management, through NEMA, stand ready to work with Congress and FEMA in identifying and implementing the necessary changes to better respond to this dynamic threat.

RECOMMENDATIONS:

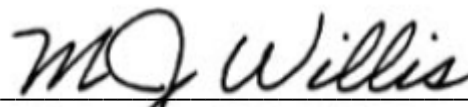
1. FEMA should engage earlier, facilitate the integration of non-natural resource/non-firefighting federal agencies into wildfire risk reduction, response, and recovery planning and operations, and take a stronger role in interagency coordination for the federal government in multi-agency incidents across all phases of a wildfire, including recovery.
2. FEMA should have the authority to work with and direct those federal agencies that own and manage land to reduce wildfire risk and recovery from wildfires that impact local, tribal, and state-owned lands. This should include coordinating and directing with agencies whose missions are to sustain environmental and energy resources on risk reduction and recovery planning and operations.
3. Revise declaration criteria to qualify the initial attack of a wildfire for emergency protective measures once the National Geographic Area Coordination Center (GACC) or the National Interagency Fire Center (NIFC) reach Preparedness Level (PL) 5.
4. Revise declaration criteria to consider statewide impacts including ongoing firefighting incident instead of only localized impacts.
5. Allow the state to utilize FMAG assistance for the prepositioning of in-state resources for wildfire response, including the pre-staging of firefighting resources to prevent fires from reaching the severity where an FMAG is needed.
6. FMAG program guidance should mirror the same eligibilities and timeframes for emergency work as those found elsewhere in the PA program.
7. FEMA should revise the FMAG policy, program, and regulations to include the same categories of eligible applications under the PA programs.
8. FMAG project on-line project tools should include a portfolio of best practices and lessons learned.

9. FEMA should update the PAPPG to include wildfire-specific challenges such as debris removal emergency protective measures and the toxicity that is left behind when a wildfire moves through a community including the contamination of drinking water resources.
10. FEMA should utilize the flexibility afforded in the DRRRA to the maximum amount possible and apply the same criteria used by other federal agencies for approving soil stabilization and reseeded projects on non-federal land when post-fire mitigation funds are used.
11. Expand the HMGP performance periods to assist in expediting mitigation projects.
12. Leverage programs such as BRIC and home hardening projects to enforce more sustainable mitigation programs for wildfires.
13. FEMA should accept pre-identified, pre-vetted 'packages' for home hardening that can be easily and rapidly replicated to achieve meaningful and timely risk reduction.
14. Allow fire districts to have the same leeway as Private Non-Profits (PNPs) to receive HMGP funding.
15. FEMA must evaluate current BCA criteria and adjust accordingly to consider the broader range of factors, ensuring prioritization of projects based upon new BCA criteria to address highest priority needs and optimize greatest return on investment.
16. Establish a BCA pre-calculated benefits criterion for common defensible space mitigation projects.
17. Ecological and societal health, carbon sequestration, improved water quality, and lessening disaster impact on traditionally underserved communities should be factors that contribute to the BCA.
18. Establish pre-calculated benefits criterion for WUI areas for defensible space activity proposals that would align with the established BCA pre-calculated benefits criterion.
19. FEMA should reconsider the interpretation that improving water supply in high-risk wildfire areas is not a measure for mitigation, especially given the ever-worsening water availability situations in areas with extreme wildfire risk profiles.
20. Provide WUI projects a more streamlined approach utilizing collected data to help implement a full review and expansion on NEPA categorical exclusions where necessary to hinder administrative delays.
21. Expand the eligible wildfire project types to include water availability upgrades in WUI areas.
22. Conduct a full review of the EHP processes to explore metrics for all mitigation projects to be processed more expeditiously.
23. Allow creative approaches and/or reductions to cost share, as well as flexibility in the grant application timeframe, particularly for disadvantaged communities.

Moved: Andrew Phelps, Oregon
Second: Tina Titze, South Dakota

DISPOSITION: Passed
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Mike Willis, NEMA Secretary