



April 13, 2015

The Honorable Bill Shuster, Chairman
Committee on Transportation and Infrastructure
U. S. House of Representatives
Washington, D.C. 20515

The Honorable Peter A. DeFazio, Ranking Member
Committee on Transportation and Infrastructure
U. S. House of Representatives
Washington, D.C. 20515

The Honorable Lou Barletta, Chairman
Subcommittee on Public Buildings, Economic
Development and Emergency Management
Committee on Transportation and Infrastructure
U. S. House of Representatives
Washington, D.C. 20515

The Honorable Andre' Carson, Ranking Member
Subcommittee on Public Buildings, Economic
Development and Emergency Management
Committee on Transportation and Infrastructure
U. S. House of Representatives
Washington, D.C. 20515

Dear Chairman Shuster, Ranking Member DeFazio, Subcommittee Chairman Barletta, and Subcommittee Ranking Member Carson:

On behalf of the National Association of Counties (NACo) and the U.S. Council of the International Association of Emergency Managers (IAEM), we are writing to thank the Committee for its continuing efforts to strengthen emergency management efforts and to offer our support for certain provisions of H.R. 1471, the FEMA Disaster Assistance Reform Act of 2015.

We are encouraged that the Act includes provisions that address the rising costs of disasters and also the needs of the local governments that support response and recovery from disasters. There are a number of provisions within H.R. 1471 on which we would like to comment; the section numbers referenced are to the bill as introduced on March 19.

Sec. 301 National Urban Search and Rescue Response System

We support the authorization of the Urban Search and Rescue Response System and appreciate the much needed clarification regarding licensing, compensation and liability protection, including funding for backfill. These teams consist primarily of local resources ready to respond to an incident with national implications.

Sec. 302 Emergency Management Assistance Compact Grants

We support the reauthorization and funding of EMAC grants which allow local and state personnel in one state to provide assistance to local and state personnel in another state. As local elected officials and local emergency managers, we both give and receive assistance through this mechanism. We would respectfully urge report language encouraging reimbursement of local resources in a timely manner.

Sec. 305 Statute of Limitations

We would particularly like to applaud these changes which would have the result of reinstating a three year statute of limitations on FEMA's ability to reclaim funds, based on a change in policy determination after an applicant has spent the funds on previously determined eligible projects and when there is no evidence of fraud waste or abuse. This provision will provide certainty and clarity to public assistance grantees and subgrantees.

Sec. 306 Action Plan to Improve Field Transition

Once a Public Assistance project worksheet has been initiated for a jurisdiction, it is often managed within FEMA by several different personnel. This results in lost documents, differences in guidance interpretation, additional work and frustration for the jurisdiction, and most importantly, more time until the project is closed out and the jurisdiction is reimbursed. We fully support the effort to have FEMA develop a resolution to this problem.

Sec. 307 Simplified Procedures

We understand the purpose of this provision which raises the Public Assistance small projects threshold to \$1 million is to reduce administrative costs and speed recovery. We applaud the Committee’s interest in raising the threshold for small projects. However, we do not have policy or available research on what the appropriate threshold should be and ask that the Committee carefully study the implications of such an increase. We would also urge robust technical assistance to help applicants avoid errors.

Sec. 308 Management Costs

We support including specific rates for direct and indirect management costs for subgrantees in addition to grantees. Currently many subgrantees do not receive management costs and this provision would provide partial funding for the administrative expenses that are incurred as response to a disaster continues.

Sec. 401 (a) and (b) Wildfire Mitigation Assistance

We support the application of section 404 hazard mitigation assistance to wildfires. Currently, only fires that receive a presidential disaster declaration under the Stafford Act are eligible for post-disaster mitigation assistance. This provision would provide parity for wildfires with other natural disasters by providing post-hazard mitigation funds, whether or not a major disaster has been declared. After a wildfire, there is an increased risk of flooding because the charred ground can no longer absorb rainwater in the same fashion; this puts lives and property at risk. This provision will help communities mitigate against future disasters related to the originating wildfire disaster.

Sec. 402 Additional Activities

We support the mitigation activities outlined in this section.

Thank you again for your outreach to Counties and local emergency managers. We appreciate the opportunity to work with you and your staff. Any time that we may be of assistance, please feel free to have a member of your staff contact Yejin Jang, Associate Legislative Director at yjang@naco.org or 202.942.4239 or Martha Braddock, IAEM-USA Policy Advisor at braddock@iaem.com or 703.644.7082.

Respectfully,



Riki Hokama, President
National Association of Counties



John “Rusty” Russell, President
U.S. Council of the International Association of Emergency Managers

About NACo:

The National Association of Counties (NACo) is the only national organization that represents county governments in the United States. Founded in 1935, NACo assists America's 3,069 counties in pursuing excellence in public service to produce healthy, vibrant, safe and resilient counties. NACo promotes sound public policies, fosters county solutions and innovation, promotes intergovernmental and public-private collaboration and provides value-added services to save counties and taxpayers money.

About IAEM-USA:

IAEM-USA is our nation's largest association of emergency management professionals, with over 8,000 members including emergency managers at the state and local government levels, tribal nations, the military, colleges and universities, private business and the nonprofit sector. Most of our members are U.S. city and county emergency managers who perform the crucial function of coordinating and integrating the efforts at the local level to prepare for, mitigate the effects of, respond to, and recover from all types of disasters including terrorist attacks.