



May 15, 2025

Mr. David Richardson  
Senior Official Performing the Duties of FEMA Administrator  
Federal Emergency Management Agency  
500 C Street NW  
Washington, DC 20472

*Submitted electronically*

**Re: Docket ID DHS-2025-0013 Request for Public Input on Experiences with FEMA Disaster Responses**

Dear Mr. Richardson:

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to provide comments regarding FEMA’s request for information (RFI) on experiences with FEMA disaster responses. AMWA is an organization representing the largest publicly owned drinking water utilities in the United States, and collectively its membership serves more than 160 million people. Our members represent utilities serving greater than 100,000 people across the nation, ranging from the largest cities to wholesale utilities serving smaller communities across large geographic areas. Our member utilities experience the full array of natural disasters common to the US, including hurricanes, tornadoes, wildfires, earthquakes, floods, windstorms, and more. AMWA member utilities have long been at the forefront of building resilience to natural disasters into their long-term planning but have still turned to FEMA for disaster response support when significant natural disasters strike.

As the providers of a service essential to public safety and community wellbeing, water utilities have direct experience with FEMA’s disaster response efforts. AMWA therefore appreciates the FEMA Review Council’s efforts to identify potential programmatic and organizational improvements to FEMA and its disaster response efforts. Our comments address the topics of many of the questions in the RFI.

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**FEMA’s disaster response efforts provide vital financial support to help water systems resume full services and ensure community safety after disasters.**

As public water systems must operate with limited budgets to meet a variety of infrastructure and planning needs, federal assistance is essential for water systems to recover after major natural disasters. According to the most recent estimates, America’s water infrastructure requires hundreds of billions of dollars to maintain current levels of service, meet regulatory requirements, and protect public health. EPA’s 7<sup>th</sup> Drinking Water Infrastructure Needs Survey and Assessment report to Congress estimated that drinking water systems alone will need \$625 billion to replace pipes, upgrade treatment plants, improve storage tanks, and enhance other critical assets.<sup>1</sup> Importantly, these estimates do not include the potential costs of recovery from disasters, illustrating the wider funding gap that exists for public water systems to maintain critical infrastructure and operations.

Furthermore, federal disaster assistance is critical to public water systems’ financial recovery from major disasters, as public systems largely rely on customer rates to fund critical operations, maintenance, and disaster responses. Public water systems often face limits in how much they can increase rates and therefore increase their budgets to prepare for potential disaster recovery. Boards, mayors, or other local elected officials usually must accept public water system’s proposed rates. Out of concerns for public affordability, these parties can therefore limit the ability of water systems to fund major infrastructure plans through rates alone. Because of water systems’ limited budgets, FEMA’s disaster recovery funding helps offset costs to the public after major natural disasters that often cost systems millions of dollars in infrastructure damage, loss, and rebuilding.

AMWA is supportive of the FEMA Review Council’s efforts to understand areas for improvement in the FEMA disaster recovery process but cautions that any reduction in this funding stream would threaten the ability of water systems to financially withstand disaster recovery after major events. As communities plan for and rebuild after extreme weather events, FEMA’s disaster response efforts and financial support should remain accessible to water systems and the cities, states, and counties with which they work.

**Beyond funding, debris removal services, emergency protective measures, and other logistical support from FEMA serve an integral, beneficial role as water systems operate during and recover after a disaster.**

FEMA’s organizational and operational disaster response efforts provide essential services that help water systems recover quickly, minimize service disruptions, and protect public health during and after disasters. It is imperative that FEMA remains available to assist with debris removal after major storms because timely and efficient cleanup is necessary for water systems

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<sup>1</sup> EPA. (September 2023). Drinking Water Infrastructure Needs Survey and Assessment 7<sup>th</sup> Report to Congress. [https://www.epa.gov/system/files/documents/2023-09/Seventh%20DWINSAs\\_September2023\\_Final.pdf](https://www.epa.gov/system/files/documents/2023-09/Seventh%20DWINSAs_September2023_Final.pdf)

to keep employees safe and resume operations. Various natural disasters, including but not limited to hurricanes, tornadoes, floods, fires, major windstorms, and ice storms, can generate diverse and overwhelming types of debris that can clog, damage, or impede water utility treatment and distribution systems. Additionally, debris from storms can prohibit safe travel for essential water utility employees or make repairs unsafe or impossible until removed. Furthermore, FEMA provides logistical support for securing crucial emergency resources like additional generators, fuel, or temporary water systems if necessary. FEMA's delivery of specific emergency services ultimately helps provide water systems with critical assistance in the height and aftermath of major disasters, and it is essential that water systems continue to have access to these services to protect public safety.

**FEMA's disaster response assistance, including the Public Assistance Program supplemental grants, is often overly burdensome and can take years to fully reimburse communities, wasting critical utility staff time and resources.**

Public water systems often face complexity and lack of clarity in the application process, associated tools, and reimbursement documentation requirements for both FEMA's Public Assistance Program grants and other FEMA grants, such as the many Hazard Mitigation Assistance grants. Because of the onerous documentation requirements for the Public Assistance Program, water systems must often turn to either hiring consultants to manage working with FEMA's disaster response teams or forgo the full array of assistance the utility should receive. Resource-strapped local governments often do not have the staff, time, or expertise to relentlessly pursue FEMA's disaster response grants and can give up during appeals processes. Alternatively, utilities that experience the most success with gaining financial support from FEMA after disaster often hire consultants to manage the process, wasting utility resources to gain access to funds that should be accessible to them through the agency alone.

The FEMA Review Council should work to establish clear expectations for public assistance grant reimbursements for eligible projects and work. Water systems seeking reimbursement from FEMA have long expressed frustration at the length of time required to obtain reimbursements after disasters. This long reimbursement period is an even heavier burden for smaller water systems and local governments with limited cash flows. It can take years for FEMA's reimbursement for eligible work, which threatens the financial security of institutions over time.

One potential consideration to improve reimbursement timelines could be the disbursement of estimated, simplified costs. Some of the nation's largest water systems have established protocols to document event response expenses using FEMA's documentation requirements, but their staff have indicated that this process can become burdensome and still results in reimbursement periods that are yearslong. FEMA could instead consider an initial and more timely payment system in the agency provides utilities with an initial payment based on simplified accounting estimates, a verification process where utilities provide detailed information, and resulting additional payments or credits to reconcile differences. Local governments could be reimbursed or owe any overpayment that resulted from the initial estimate.

One additional method to significantly improve the FEMA disaster response effort is to bolster FEMA's technical assistance apparatus for post-disaster recovery as well as for pre-disaster grant programs. Any FEMA Review Council efforts should include an examination by FEMA to provide more meaningful technical assistance opportunities to communities applying for FEMA disaster response aid. FEMA should conduct proactive outreach to communities, with FEMA staff, state staff, and potentially other federal or state contractors to help communities navigate the reimbursement and other public assistance grants. Partnerships can be a critical approach toward helping communities successfully receive FEMA grants.

**Water systems also greatly benefit from FEMA's Hazard Mitigation Assistance (HMA) Grants to fund projects that will prevent the worst effects from natural disasters before they occur.**

FEMA's HMA programs have historically had a significant role in bolstering water utilities' resilience, and AMWA encourages the continued development and support for these programs. FEMA's HMA programs provide one of the few federal sources of major funding for projects that address and mitigate hazards before major natural disasters happen. These programs fund critical infrastructure resilience projects for water systems, like bolstering the preparedness of water treatment plants and other infrastructure against threats such as flooding, wildfires, or other storms. They also help utilities fund projects that will allow them to continue to provide critical services during and immediately following disasters. AMWA encourages the FEMA Review Council to continue to support the improvement of these programs.

**Finally, the FEMA Review Council should work directly with representatives of critical infrastructure sectors, including water, and local, county, city, and state representatives when considering methods to improve FEMA's disaster recovery efforts.**

FEMA's Review Council should engage with national organizations representing critical infrastructure partners, such as drinking, storm, and wastewater utilities, as well as related partners, like electricity utilities. Additionally, the Review Council should include representatives from state and local governments to better understand how water utilities interact with other local and federal parties during disaster recovery efforts. Many AMWA member utilities have demonstrated and facilitated long-term disaster preparedness planning across different city, county, and utility organizations. FEMA can continue to support this work by partnering and conducting outreach across associations and organizations representing localities, including city, county, utility, and regional agencies.

**Conclusion**

Thank you for the opportunity to comment. As large, metropolitan drinking water agencies, AMWA members understand the importance of preparing for and addressing natural disasters and appreciate the role FEMA's disaster response efforts have in bolstering the security and

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recovery of utilities and communities nationwide. If you have any questions about this letter, please contact Jessica Evans, AMWA's Senior Manager of Government Affairs and Sustainability Policy, at [evans@amwa.net](mailto:evans@amwa.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Dobbins". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Thomas Dobbins  
Chief Executive Officer

cc: Patrick Powers, Designated Federal Officer of the Federal Emergency Management Agency  
Review Council