



September 23, 2022

Ms. Deanne Criswell
Administrator
Federal Emergency Management Agency
500 C Street NW
Washington, DC 20472

Re: Docket ID FEMA-2022-0023 Hazard Mitigation Assistance Program and Policy Guide

Dear Administrator Criswell,

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to provide comments regarding FEMA’s update to the Hazard Mitigation Assistance (HMA) Program and Policy Guide. 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 diverse metropolitan areas and have considered methods to become climate resilient for decades. AMWA members apply for FEMA recovery, preparedness, and hazard mitigation funds.

AMWA appreciates the efforts of FEMA to update and improve its HMA policy guide with the intent of simplifying information about applications and implementation of hazard mitigation assistance programs. Our comments acknowledge areas where the HMA Program and Policy Guide could be updated to improve the clarity of application requirements and mitigation activities.

General Comments on FEMA Grants and the Policy Guide

Complexity in FEMA grant process and tools are a barrier

Resource strapped local governments may not have the staff, time, or expertise to pursue FEMA hazard mitigation assistance grants. The FEMA process has been described by AMWA members as “complex” and “opaque,” and members have remarked the grant application and program implementation can take a significant amount of experienced staff members’ time and efforts. The updated HMA Program and Policy guide could best be capitalized on through additional efforts by FEMA to provide meaningful technical assistance opportunities. FEMA needs to do proactive outreach to communities, particularly those with large swaths of vulnerable, disadvantaged communities, with FEMA staff, state staff, and potentially other federal or state contractors to help

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communities identify local hazards and develop project proposals that best address these hazards. Partnerships can be a critical approach toward helping communities apply for FEMA grants.

One experience of an AMWA member shows how the complexity of mitigation grant applications can be mitigated by a state's commitment to provide technical assistance and staff. FEMA requires a Benefit-Cost-Analysis (BCA) for its mitigation grant programs. FEMA provides an add-on for Microsoft Excel to run the BCA. For at least one of AMWA's members, there were requirements for the BCA that were not clear and led to their initial BRIC application being rejected. The state-hired consultant provided detailed feedback on how to do the BCA, and the team was able to correct the issues and successfully submit their application. The consultant stated that past versions of the tool were more transparent about how calculations were made and that the current version is more of a black box. This could be a significant stumbling block for communities.

All-hazard approach

FEMA's emphasis in the policy and planning guide should be to continue to foster an all-hazard approach to emergency management utilizing its planning process and tools.

Reimbursement implementation

Local entities seeking reimbursement from FEMA have long expressed frustrated at the length of time required to obtain reimbursements. This long reimbursement period is a heavier burden for smaller jurisdictions with greater cash flow issues; however, the HMA guidance should more clearly delineate expectations of timelines for reimbursement.

Some of AMWA's larger members have protocols to document event response expenses using FEMA requirements to generate the needed documentation in the required format, but this process can become burdensome, with reimbursement times stretching to years. FEMA could consider an initial and more timely payment based upon simplified accounting estimates, followed by a verification process with more detailed data and a payoff plan over time. Local governments could be reimbursed any overpayment that resulted from the initial estimate.

Constant evaluation of climate change impacts

FEMA should look to continually make simple strides to plan for warming and changing extremes in the HMA program and policy guide. As communities rebuild after extreme events, FEMA should be considering what is resilient in a hotter and more intense future in terms of weather extremes.

Specific Building Resilient Infrastructure and Communities (BRIC) Program Feedback

Some AMWA members have remarked that the timeline of applying to learning of a BRIC award and implementation of BRIC funding for their utilities has been a frustrating, years-long process. The program and policy guide could serve as a potential avenue to addressing this delay or clearly indicating how long utilities may have to expect before implementing funds.

Additionally, AMWA has previously commented and supported the FEMA GO portal for application submission created under the BRIC program. FEMA should continue to develop that portal with a

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focus on a positive user experience. The portal should be set up in such a way to prompt for inputs and materials that are directly correlated with meeting the grant rating criteria, as applicants should not have to guess at what information is necessary to complete the application.

Thank you for the opportunity to comment. As large, metropolitan drinking water agencies, AMWA members understand the importance of resilient infrastructure and appreciate the role FEMA HMA programs have in bolstering their utilities' resilience. If you have any questions about this letter, please contact Jessica Evans, AMWA's Government Affairs Associate at 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".

Thomas Dobbins
Chief Executive Officer

cc: Jennie Orenstein