



July 25, 2023

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

Submitted electronically

Re: Docket ID FEMA-2023-0009 Community Disaster Resilience Zones and the National Risk Index

Dear Administrator Criswell:

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to provide comments regarding FEMA’s request for information (RFI) on community disaster resilience zones and the National Risk Index. 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 and implemented projects to advance climate and disaster resilience for decades. AMWA members often apply for FEMA recovery, preparedness, and hazard mitigation funds, including the Building Resilient Infrastructure and Communities (BRIC) program.

AMWA appreciates the efforts of FEMA to effectively implement the Community Disaster Resilience Zones Act of 2022 by updating the National Risk Index and considering processes to designate and assist community disaster resilience zones. Our comments address the topics of many of the questions posed in the RFI.

Responses to Climate Change and Future Conditions Data

AMWA is supportive of FEMA’s efforts to incorporate climate change data and future conditions in its evaluation of the National Risk Index and designation of community disaster resilience zones. As communities plan for and rebuild after extreme weather events, FEMA’s tools should incorporate projections that include both changes in temperature and the projected intensity and frequency of extreme weather events.

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Responses to Resilience or Mitigation Project Planning Assistance and Community Disaster Resilience Zone Project Application and Certification Process and Other Investment Opportunities

AMWA has previously commented on and supported the FEMA GO portal and believes that a community's designation as a community disaster resilience zone should be incorporated into the application and management portal. FEMA should continue to develop that portal with a focus on a positive user experience, including incorporating when a community has been identified as a designated community disaster resilience zone and what additional eligibilities come with that designation. The portal should be set up in such a way as to prompt for inputs and materials that directly correlate with meeting the grant rating criteria.

One major concern that AMWA members reiterate when discussing FEMA grants is the complexity and lack of clarity in the application process and associated tools. While AMWA appreciates the efforts of FEMA to clarify and update FEMA's risk assessment tools, resource-strapped local governments often do 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 portion of experienced staff members' time and efforts. Any technical and application assistance FEMA provides with the community disaster resilience zone project applications should address these concerns.

To support comprehensive community resilience planning, FEMA should work with national-level organizations representing the stakeholder and decision-making entities that plan for resilience, including associations representing city and local governments and their energy and water utilities. Many AMWA member utilities have demonstrated and facilitated long-term resilience 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.

Furthermore, to provide technical assistance to benefit communities within community disaster resilience zones, FEMA should engage with national organizations representing state and local governments, including city planners and drinking and wastewater utilities. Outreach to many of these organizations will ensure multiple opportunities for utility leaders to learn about FEMA grant opportunities and encourage connections between federal program officials and potential applicants.

FEMA should also consider proactive outreach to communities that are designated community disaster resilience zones, with FEMA staff, state staff, and potentially other federal or state contractors to help communities identify local hazards and develop project proposals that best address these hazards. Partnerships can be a critical approach in assisting communities to apply for FEMA grants.

One recent experience of an AMWA member utility show how the complexity of mitigation grant applications can be alleviated by a commitment and support of multiple partners to provide both technical assistance and designated staff throughout the application and implementation phases. One large utility spent weeks of staff time preparing a BRIC application, following the details and instructions to the best of their ability. Upon notice that the utility was not accepted to receive a grant, utility staff attempted to follow up with FEMA to understand what errors or other issues prevented their utility from receiving the grant, particularly given that the utility would like to apply again in the future. These staff reported confusion as to which FEMA office or staff member to follow up with to understand if the denial was an application issue or another concern. This kind of process could be a significant hindrance for communities that clearer communication channels, improved application technical assistance, and local, state, and federal partnerships could address.

Conclusion

Thank you for the opportunity to comment. AMWA supports FEMA's commitment to designate and prioritize funding for communities with demonstrated pressing risks to major disasters. As large, metropolitan drinking water agencies, AMWA members understand the importance of preparing for and addressing natural disasters and appreciate the role FEMA programs have in bolstering their utilities' resilience. If you have any questions about this letter, please contact Jessica Evans, AMWA's Manager of Government Affairs and Sustainability Policy, 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" and a long, sweeping underline.

Thomas Dobbins
Chief Executive Officer

cc: Pamela Williams, Assistant Administrator, Grants Programs, Resilience
FEMA-CDRZ-RFI@fema.dhs.gov