

June 8, 2026

The Honorable Pete Hegseth  
Secretary  
Department of War  
Washington, DC 20301

The Honorable Mike Mullin  
Secretary  
Department of Homeland Security  
Washington, DC 20528

Dear Secretaries Hegseth and Mullin:

The undersigned organizations—representing leaders from the business, infrastructure, environmental, insurance, and state and local government communities—appreciate the work of the FEMA Review Council and its comprehensive effort to modernize the nation’s emergency management systems.

We strongly support the report’s recognition that preparedness and predisaster mitigation are foundational to national resilience and that existing programs are often overly complex, slow, and difficult to access. We also commend the Council’s acknowledgment that disaster risk is growing in frequency, severity, and cost—necessitating a more proactive and forward-looking federal approach.

Importantly, we also appreciate the Council’s emphasis on a framework that is locally driven, state-managed, and federally supported. This approach aligns closely with the effort advanced in the Fixing Emergency Management for Americans (FEMA) Act of 2025, which similarly seeks to empower state and local actors while preserving a strong and consistent federal role. Properly implemented, this model can enhance efficiency and accountability while ensuring that national-scale risks are addressed with national-scale resources.

At the same time, as Congress and the Administration consider implementation of these recommendations, it is critical that reforms strengthen investment, incentives, and federal leadership in predisaster mitigation and preparedness, which are proven to save lives and reduce costs. Our coalition has consistently emphasized that investments in preparedness deliver substantial returns and have economic benefits. Recent reports have indicated that for every \$1 invested, there can be up to \$13 in reduced losses and economic savings.<sup>1</sup>

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<sup>1</sup> See: Barrett, K., & Insurance Institute for Business & Home Safety. (2022). *Construction costs for a wildfire resilient home: California edition*. Headwaters Economics & IBHS.; Multihazard Mitigation Council. (2019). *Natural hazard mitigation saves: 2019 report*. National Institute of Building Sciences.; Simmons, K. M., Czajkowski, J., & Done, J. M. (2018). *Economic effectiveness of implementing a statewide building code: The case of Florida*. *Land Economics*, 94(2), 155–174. <https://doi.org/10.3368/le.94.2.155>; United Nations Office for Disaster Risk Reduction. (2025). *Global assessment report on disaster risk reduction 2025*. UNDRR.; U.S.

## **Preserve and Strengthen the Federal Role in Mitigation and Preparedness**

While we support efforts to empower state and local leadership, we caution against any reforms that could inadvertently weaken federal engagement.

Increasingly, disasters are regional and systemic in nature, affecting multiple states, interconnected infrastructure systems, and national supply chains. A strong federal role remains essential to:

- Establish national standards and best practices.
- Provide consistent funding that allows broad community participation, especially for preparedness.
- Coordinate across jurisdictions and sectors.
- Address risks that exceed state, local, and regional capacity.
- Maintain the National Flood Insurance Program, which provides societal benefits beyond insuring against flood losses, including publicly available flood maps, predisaster mitigation and facilitating state and local roles in guiding development.

### **Recommendations:**

- Maintain a robust federal role in preparedness and mitigation funding, coordination, and technical assistance, consistent with both the FEMA Act and the Council's framework.
- Congressionally reauthorize the National Flood Insurance Program for long term stability and national flood resilience.

## **Improve Predisaster Mitigation Programs**

We recognize the Council's efforts to reform mitigation funding structures, including the proposed replacement of the Hazard Mitigation Grant Program (HMGP). While the current system has limitations — particularly delays in postdisaster funding and overly complex grant management requirements — there is significant risk in eliminating or fundamentally restructuring established programs without ensuring that proven risk reduction investments by the federal government are not eliminated.

Dedicated mitigation programs have enabled critical investments in:

- Infrastructure hardening and retrofits.
- Consensus-based, hazard-resistant building codes and standards.
- Floodplain management and risk reduction.
- Nature-based solutions and land management practices that reduce disaster risk and protect high risk communities.

HMGP complements predisaster mitigation programs by helping businesses and families at their time of greatest need — after a disaster. We suggest that all hazard mitigation programs need to be evaluated and made more effective and focused on preparedness.

### **Recommendations:**

- Provide meaningful funding, streamline, enhance existing mitigation programs, including HMGP and dedicated, predictable predisaster funding and implementation.

## **Expand Incentives for Proactive Resilience Investment**

The Council correctly identifies the need for improved outcomes and accountability.

However, stronger emphasis is needed on improving and expanding predisaster mitigation programs and incentives that drive mitigation and preparedness investments before disasters occur.

Our coalition has consistently supported policies that:

- Encourage households and businesses to invest in resilience.
- Align financial signals across federal programs and markets.
- Reduce long-term disaster costs.

### **Recommendations:**

- Establish or expand:
  - Tax incentives for resilience investments that help among other actions, mobilize private capital.
  - Disaster savings accounts.
  - Parity in tax treatment for state mitigation grants.
- Integrate mitigation incentives across federal policies, including insurance, housing, and infrastructure programs.
- Ensure federal funding complements—not replaces—private sector investment.

### **Increase Preparedness Capacity and Technical Assistance**

We support the Council’s focus on improving preparedness capabilities, professionalization, and coordination. However, many communities — particularly smaller and rural jurisdictions — continue to face significant capacity constraints.

#### **Recommendations:**

- Provide meaningful funding for preparedness and technical assistance programs such as the HMGP, the Emergency Management Performance Grant program, and the Building Resilient Infrastructure and Communities program.
- Streamline administrative barriers to preparedness programs and expand federal technical assistance—in partnership with the private sector—to help communities navigate grants, develop mitigation projects, and accelerate project delivery.
- Prioritize support for at-risk and underserved communities to ensure broad access to resilience resources and opportunities.

### **Advance a Whole-of-Society Approach to Resilience**

We strongly support the Council’s emphasis on a whole-of-society approach to engage and coordinate stakeholders. Effective mitigation and preparedness depend on integrating capabilities across sectors and supports national and economic security. This is very similar to the stakeholder council we had been proposing through legislation.

#### **Recommendations:**

- Institutionalize public-private coordination mechanisms at the national and regional levels.
- Develop improved data-sharing and risk assessment tools accessible to both public and private stakeholders.

## Conclusion

The FEMA Review Council has provided an important and timely framework for strengthening the nation’s emergency management system. We believe that this framework— emphasizing locally driven action, supported by strong federal leadership, and grounded in a whole-of-society approach — provides a solid foundation for reform.

To fully realize this vision, forthcoming policy and discussions should:

- Sustain and expand predisaster mitigation and preparedness investments.
- Preserve a strong federal role in coordination and funding.
- Advance incentives that drive proactive resilience.
- Strengthen partnerships across all sectors.

Resilience is not only sound public policy — it is an economic imperative that protects lives, infrastructure, communities, and the economy. We look forward to working with you to ensure these recommendations are implemented in a way that builds a safer, stronger, and more resilient America.

Sincerely,

American Council of Engineering Companies  
American Society of Civil Engineers  
Association of State Floodplain Managers  
BuildStrong America  
Business Council for Sustainable Energy  
Future Proofing America  
Geos Institute  
International Association of Plumbing and Mechanical Officials  
International Code Council  
National Association of Counties  
National Association of Flood and Stormwater Management Agencies  
U.S. Chamber of Commerce