

June 5, 2026

Michael Miron,
Committee Management Officer,
Office of Partnership and Engagement,
Department of Homeland Security,
2707 Martin Luther King Jr. Ave. SE,
Washington, DC 20032

Re: Public Comment on FEMA Review Council Report — Docket No. DHS-2026-0067

Dear Mr. Miron,

The SmarterSafer Coalition (“the Coalition”) is a national [coalition](#) that includes a diverse chorus of voices that champion environmentally responsible and fiscally sound approaches to natural catastrophe mitigation and public safety. The coalition focuses on several policy areas, including flood and wildfire risk, extreme heat, infrastructure investment, environmental protection and conservation, and overall responsible stewardship of taxpayer dollars.

The Coalition appreciates the opportunity to comment on the Federal Emergency Management Agency (“FEMA”) Review Council’s (“the Council”) [final report](#) to the President of the United States. Initially established through [Executive Order 14180](#), the Council was charged with evaluating and strengthening FEMA’s disaster response capabilities, including assessing the agency’s efficiency, neutrality, and coordination with state and local governments, while addressing concerns related to political bias and resource management. On May 7, the Council released its final report to the President, outlining a comprehensive set of recommendations to reform the federal government’s approach to disaster preparedness, response, and recovery.

Below, we outline areas of support and potential improvement. As always, the Coalition looks forward to being a resource.

The Coalition appreciates the Council’s recognition that disaster policy should place greater emphasis on preparedness, mitigation, risk-informed decision-making, and long-term fiscal sustainability. Several recommendations in the report align with SmarterSafer’s longstanding priorities, particularly those focused on strengthening mitigation investments, improving resilience, modernizing flood insurance, and reducing long-term taxpayer exposure to disaster losses.

SmarterSafer supports the report’s recognition of the importance of mitigation and resilience. The report notes that state and local governments play an important role in “proper land-use planning” and “enforcing building codes to harden critical infrastructure against identified local risks,” and it observes that FEMA’s current Hazard Mitigation Grant Program (HMGP) can be “hampered by administrative burdens that delay funding distribution until well after rebuilding begins,” potentially missing opportunities for cost-effective mitigation. The Coalition agrees that FEMA should make mitigation a central focus of its mission, including through stronger building standards, floodplain management, wildfire mitigation, resilient infrastructure, and nature-based solutions. While the report discusses resilience in several places, its recommendations place limited emphasis on pre-disaster mitigation. We also encourage careful consideration of any proposed changes to HMGP administration to ensure they strengthen, rather than diminish, incentives for long-term risk reduction. Specifically, while we are open to proposals that enhance the role of states in program administration, any such changes should preserve robust federal oversight of state management and maintain the long-standing federal commitment to cost-sharing under the Hazard Mitigation Grant Program.

As SmarterSafer has previously noted, research demonstrates that “every \$1 invested in pre-disaster mitigation saves up to \$13 in federal spending.”¹ Given the clear return on mitigation spending, we are supportive of efforts to strategically improve the quality of the program while retaining access to this critical resource.

The recommendations to improve information sharing and tracking of success metrics are supported by our Coalition, and we are glad to see a focus on following the most cost-effective program implementation.

The Coalition also supports continued efforts to improve the long-term fiscal sustainability of the National Flood Insurance Program (“NFIP”) through accurate risk communication, updated flood mapping, mitigation incentives, actuarially sound pricing, and affordability considerations. The report recognizes that the NFIP faces significant challenges related to “financial sustainability,” repetitive losses, and outdated flood risk information.² The Coalition agrees that improving the long-term stability of the NFIP will require policies that better align flood insurance pricing with actual flood risk while also strengthening mitigation investments and improving consumer understanding of risk.

SmarterSafer particularly supports the report’s recommendation that Risk Rating 2.0 “must continue to be implemented and updated based on better information and science,” including affordability considerations, and that FEMA should improve “the accessibility, transparency, and

¹ SmarterSafer Coal., *Resiliency and Pre-Disaster Mitigation: Investments That Benefit American Taxpayers* 2, 10 (2025)

² President’s Council to Assess the Fed. Emergency Mgmt. Agency, *Final Report* 47 (May 7, 2026).

quality of flood risk data and communication tools for all stakeholders.”³ Accurate and forward-looking risk information is essential to helping homeowners, businesses, insurers, lenders, and local governments make informed decisions regarding development, insurance coverage, infrastructure investment, and mitigation planning. While the recognition that flood risk data must be improved is an important first step, the Coalition supports the development of more specific recommendations to FEMA and Congress to rapidly update floodplain maps nationally.

The Coalition also supports the report’s recommendation that FEMA “implement risk-based pricing and actual costs.”⁴ Risk-based pricing is critical to communicating the true cost of flood risk, encouraging property-level mitigation, and reducing long-term taxpayer exposure. As SmarterSafer has previously noted, the NFIP currently faces significant financial strain, including approximately \$22.525 billion in debt, and historically subsidized premiums that remain below actuarially sound levels have contributed to the program’s long-term financial instability.⁵

At the same time, the Coalition encourages FEMA and policymakers to ensure that continued implementation of Risk Rating 2.0 is paired with improved affordability assistance, mitigation support, and public communication tools. Accurate rates should be accompanied by policies that help households and communities reduce risk over time through mitigation investments, stronger building standards, and improved resilience planning. We further appreciate the report’s recommendation that FEMA and Congress explore opportunities to address affordability challenges arising from increased rates, to avoid loss of coverage under the program.

The Coalition further supports the report’s focus on repetitive loss properties and mitigation-based solutions to reduce future flood losses. The report recognizes the importance of mitigation investments and resilience planning to reduce repetitive losses and improve fiscal sustainability.⁶ SmarterSafer agrees that federal flood policy should prioritize investments that reduce long-term risk exposure and break the cycle of repeated flood damage and rebuilding. We appreciate the report’s recommendation to implement policy goals proposed in [S. 1545, the Repeatedly Flooded Communities Act](#), which seeks to address the longer-term, structural challenges posed by repetitive loss properties, and find economically sensible mitigation measures to prevent repetitive loss. At the same time, the Coalition encourages FEMA and policymakers to ensure that any future reforms to mitigation programs, such as Building Resilient Infrastructure and Communities (BRIC), preserve reliable mitigation funding, equitable access for communities, and strong incentives for pre-disaster risk reduction.

The Coalition further supports efforts to streamline FEMA program implementation and improve administrative efficiency. The report states that “[a] central issue with the current disaster management system is the amount of taxpayer money used for administrative costs” and that “almost 25 cents on every dollar can be provided for administrative expenses.”⁷ SmarterSafer agrees that mitigation and resilience programs should be easier for states, local governments, Tribal governments, and property owners to access and implement. Streamlining application

³ *Id.* at 48

⁴ *Id.*

⁵ SmarterSafer Coal., *supra* note 3, at 6-7

⁶ President’s Council to Assess the Fed. Emergency Mgmt. Agency, *Final Report* 35, 50 (May 7, 2026)

⁷ *Id.* at 12

requirements, improving interagency coordination, reducing duplicative administrative processes, and accelerating mitigation funding delivery can help ensure taxpayer dollars are directed toward resilience outcomes rather than unnecessary process costs.

At the same time, reforms should preserve transparency, accountability, and equitable access to assistance. The report recognizes that “[a]ny sense of urgency” in providing assistance “should be carefully balanced with a robust financial review and compliance.”⁸ Smaller and under-resourced communities often face significant barriers in navigating federal mitigation and recovery programs. FEMA should ensure that modernization and streamlining efforts improve implementation capacity and accessibility without unintentionally disadvantaging vulnerable communities or reducing oversight safeguards.

The Coalition also supports the report’s attention to the need for better risk information and resilient land-use decisions. The report states that FEMA should “explore ways to modernize the Community Rating System incentives to reward integration of property-level resilience activities,” align floodplain standards with modernized mapping data, and support states in promoting risk communication with local land-use planning.⁹ SmarterSafer has similarly supported updated mapping, improved resiliency measures, NFIP minimum building criteria, and incentives for state, local, and Tribal governments to improve land use planning, adopt and enforce building codes, and use code-plus designs.¹⁰ These measures are essential to helping communities understand risk and make better decisions about development, insurance coverage, infrastructure investment, and mitigation planning.

Finally, SmarterSafer supports efforts to leverage private-sector participation and public-private partnerships to improve resilience and reduce taxpayer exposure. The report recommends that FEMA coordinate with Treasury, state insurance commissioners, and insurance industry stakeholders to evaluate NFIP reforms, including private-market participation and consumer protections.¹¹ SmarterSafer has also recognized that reinsurance, catastrophe bonds, and public-private partnerships can help transfer risk, support resilience investment, and reduce taxpayer exposure.¹² FEMA should continue exploring opportunities to complement federal mitigation efforts with private-sector innovation and risk-transfer tools that improve program sustainability while protecting policyholders and taxpayers alike. The private insurance market and federal programs work together to maximize coverage and affordability, helping prevent and absorb the economic shocks caused by disasters. We support broader efforts to recognize this unique structure, which will help identify and address market inefficiencies more effectively.

As FEMA and policymakers consider the Council’s recommendations, SmarterSafer urges them to prioritize reforms that reduce future risk, strengthen mitigation, including pre-disaster mitigation opportunities, improve implementation efficiency, modernize flood risk management, and responsibly steward taxpayer resources. Federal disaster policy should help communities prepare for future hazards, not simply respond after losses occur.

⁸ *Id.*

⁹ *Id.* at 48

¹⁰ SmarterSafer Coal., *supra* note 3, at 11-12

¹¹ President’s Council to Assess the Fed. Emergency Mgmt. Agency, *Final Report* 51-52 (May 7, 2026)

¹² SmarterSafer Coal., *supra* note 3, at 7-8

We appreciate the opportunity to provide comments on the FEMA Review Council's final report and look forward to continued engagement on policies that strengthen national resilience, improve public safety, and protect taxpayers.

Sincerely,
The SmarterSafer Coalition

MEMBERS

Environmental Organizations

American Rivers
Center for Climate and Energy Solutions (C2ES)
ConservAmerica
Defenders of Wildlife
National Wildlife Federation
Natural Resources Defense Council (NRDC)
The Nature Conservancy
Surfrider Foundation

Consumer and Taxpayer Advocates

National Taxpayers Union
R Street Institute
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Insurer and Reinsurer Interests

American Property Casualty Insurance Association (APCIA)
Association of Bermuda Insurers and Reinsurers (ABIR)
Chubb
Liberty Mutual Group
National Association of Mutual Insurance Companies (NAMIC)
National Flood Association
Reinsurance Association of America
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USAA

Mitigation Interests

Natural Hazard Mitigation Association

Housing

Habitat for Humanity
National Housing Conference
National Leased Housing Association

ALLIED ORGANIZATIONS

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