April 23, 2008

Senator Robert Byrd  
Chairman, Subcommittee on Homeland Security  
Senate Committee on Appropriations  
135 Dirksen Senate Office Building  
Washington D.C. 20510

Senator Thad Cochran  
Ranking Minority Member, Subcommittee on Homeland Security  
Senate Committee on Appropriations  
135 Dirksen Senate Office Building  
Washington D.C. 20510

Re: Opposing Pre-Disaster Mitigation Program Earmarks

Dear Senators Byrd and Cochran:

The South Carolina Association for Hazard Mitigation (SCAHM) is a non-profit organization dedicated to reducing loss of life and property damage resulting from natural and man-made hazards. SCAHM is one of 26 chapters of the national Association of State Floodplain Managers (ASFPM), comprising 11,000 individual and chapter members.

The SCAHM would like to express our concern about the recently identified projects in the Joint Explanatory Statement specified for the Pre-Disaster Mitigation (PDM) program. These "earmark like" projects were included in the recently passed Consolidated Appropriations Act of 2008. **Our Association opposes project specific set-asides.** The language in the bill requires compliance with program rules and we insist that these "earmark like" projects funded with the Pre-Disaster Mitigation Fund comply with the criteria in Section 203(g) of the Robert T. Stafford Disaster Relief and Emergency Act (Stafford Act). **Additionally, we strongly oppose any efforts to continue this practice in 2009 as it harms South Carolina communities.**

SCAHM is concerned about the unprecedented scope of project specific set-asides (earmarks, Congressional directives, etc.) in competitive grant programs like PDM. Project specific set-asides of mitigation programs have been minimal in the past and FEMA internal project evaluation mechanisms are widely considered to be strong and well grounded in sound public policy. Because there is nearly always more demand than there are funds allocated for hazard mitigation, these programs are either apportioned to all states based on specific formulas or triggers, or are nationally
competitive based on set criteria that every applicant must follow. This is a simple measure of fairness. Actions like project specific set-asides hurt every state, even those that are the recipients of such earmarks. Communities in South Carolina are committed to reducing losses from disasters, and the PDM program is the only FEMA grant program that provides a significant amount of funding on an annual basis. Including earmarks in the PDM program makes it even more difficult for our communities to compete for funding for their mitigation projects. We are expressing our firm support for any and all efforts to adhere to PDM program rules and regulations because set-asides create an uneven playing field for communities seeking these grant funds. With your seat on the Appropriations Committee and Homeland Security Subcommittee, we are requesting that you do all you can to ensure earmarking doesn’t happen in the future.

We thank you for your consideration of our above comments and the SCAHM would be pleased to discuss with your staff any issues involving hazard mitigation. On behalf of our 100 member and growing organization, we are most thankful for your service and we share your commitment to protecting lives and property by making communities across the United States more resilient to natural and man-made hazards.

Sincerely,

Chris Stone, CFM
Chair

cc: Senator Lindsay Graham
    Senator Jim Demint
    Larry Larson, P.E., CFM, ASFPM Executive Director
    Meredith Inderfurth, ASFPM Washington Liaison
    Ronald C. Osborne, Director, SC Emergency Management Division
    Lisa Jones, SC NFIP Coordinator, SC Department of Natural Resources
    Ann Roberson, Executive Assistant to the Director for Special Projects, SC
    Department of Insurance
    SCAHM Board