Honorable Janet Napolitano, Secretary  
Department of Homeland Security  
Washington DC 20510  

February 25, 2009

Dear Madam Secretary,

Congratulations on your assumption of the post of Secretary of Homeland Security. We wish you well in meeting the many challenges of this key position.

As you consider the structure and tasks of the Department of Homeland Security, the Association of State Floodplain Managers (ASFPM) would appreciate your consideration of our recommendation that the Federal Emergency Management Agency (FEMA) be restored to its former independent-agency status, with direct access to the President. We believe this step is necessary to ensure that the agency is nimble and effective in fulfilling the four key elements of a successful multi-hazard policy: mitigation, preparedness, response, and recovery. An independent and reinvigorated FEMA is essential to the nation’s public safety and economic security as we encounter the expected increase in natural disasters that will accompany population growth and intensified development within at-risk areas, as well as possible impacts from a changing climate.

FEMA had, and will continue to have, access to other agency resources under Title IV–Sections 402 and 403 of the Stafford Act. Hence the reasoning that making FEMA a stand-alone agency would result in the loss of resources and capabilities through Homeland Security, such as search and rescue, communications, law enforcement, intelligence, infrastructure protection, is not accurate.

The ASFPM is an association of 13,000 members and 27 state chapters, representing the state and local floodplain managers and professionals from related fields nationwide. For three decades the ASFPM and its members have been FEMA’s partners in implementing programs to reduce loss of life and property due to flooding. Our state members are appointed by their state governors to manage flood risk reduction programs in their respective states as well as coordinate the administration of the National Flood Insurance Program (NFIP). Our members have long been concerned about the ramifications of FEMA’s inclusion in the Department of Homeland Security (DHS). The Board of Directors twice has passed resolutions calling for independent status for FEMA or, at a minimum, increased autonomy within DHS.

The ASFPM has a long history of working with our federal NFIP partners. In fact, we can trace our roots to coordination with the Department of Housing and Urban Development and then to the newly created FEMA staff when the NFIP was in its infancy during the 1970s. During the years since then, we observed FEMA’s emergence as a strong agency that guided the nation’s efforts to reduce the damage, costs, and human suffering caused by natural disasters—all in close cooperation with state and local officials.
FEMA had developed the capacity for flexibility and well-coordinated, genuine give-and-take partnerships with states and localities. These factors also allowed the FEMA of the 1990s to develop well-conceived programs promoting mitigation for all the natural hazards—the flooding, severe storms, hurricanes, earthquakes, drought, tornadoes, and other events that occur week in and week out somewhere in the nation. Such mitigation programs seek to permanently break the disaster cycle of damage/rebuild/damage, thus saving recovery and repair costs (that ultimately are borne by taxpayers) and also reducing economic disruption due to disasters.

Sadly, since FEMA’s inclusion in the new DHS in 2002, many things have changed. We have witnessed a distinct loss of effectiveness on the part of FEMA, diminished agency morale, and a hobbled capacity to perform its mission. The critical role DHS plays in protecting the nation from terrorism unfortunately has had the effect of diverting significant attention and human and financial resources away from the threat of natural disasters, which are occurring with increasing frequency and intensity. Slowdowns due to the added layers of the large DHS bureaucracy have increased dramatically, both at FEMA headquarters and in its regional offices. This unfortunate reality has seriously affected rule making and policy development as well as the administration of grant programs for mitigating damage and taking regulatory action. Ripple effects are evident in state and local emergency management, public safety, and disaster mitigation capacities.

After the “wake-up call” of the 2004 and 2005 hurricanes, DHS did begin to pay more attention to natural disaster preparedness and response. However, the other two crucial elements of a sound disaster policy—mitigation and recovery—have remained lost in the other activities of DHS. This is despite the release of a report by the National Institute of Building Sciences that documented a 4-to-1 benefit-to-cost ratio for investment in mitigation.

We understand that the original concept for including FEMA within DHS was likely based on the pre-existing effective partnerships between FEMA and state and local officials and the anticipated usefulness of those partnerships in a terrorist attack. However, we have found that the effectiveness and health of those partnerships and the overall ability of FEMA to perform its all-hazards mission has been seriously undermined. Restoration of FEMA to independent status, reporting directly to the President, will renew and invigorate the federal government’s capacity to develop policy, support state and local officials, and work effectively with other federal agencies and the Congress in all areas of disaster mitigation, preparedness, response, and recovery.

An independent FEMA is essential to the disaster resilience of our nation and its communities.

Very sincerely,

Al W. Goodman, Jr., CFM
Chair, ASFPM