

July 25, 2023



Comments to Federal Emergency Management Agency on implementation of the Community Disaster Resilience Zones Act of 2022

Docket ID: FEMA–2023–0009

In response to the proposed establishment of Community Disaster Resilience Zones (CDRZ) and the National Risk Index (NRI) outlined in the Federal Register document (2023-11268), Taxpayers for Common Sense (TCS) would like to express its support for these initiatives. We believe that the implementation of CDRZs and the NRI can significantly enhance our nation’s disaster preparedness and response capabilities.

At Taxpayers for Common Sense, our mission is simple yet powerful: to be the unwavering voice of the American taxpayer. We tirelessly advocate for transparency, accountability, and responsible fiscal stewardship in government spending. Through meticulous research and analysis, we shed light on wasteful and unnecessary expenditures, ensuring that taxpayer dollars are used efficiently and effectively. With a commitment to nonpartisanship, we work across party lines to hold elected officials accountable and promote common sense solutions.

TCS supports policies and programs that promote efficient allocation of resources, transparency, and collaboration among stakeholders to ensure that disaster resilience and mitigation efforts are effective and fiscally responsible. We advocate for a shift in focus from post-disaster spending to pre-disaster mitigation and resilience efforts, which can reduce the vulnerability of people, property, and infrastructure to natural disasters. For instance, the National Institute of Building Sciences estimates that every \$1 invested in pre-disaster flood mitigation can save up to \$6 in federal disaster relief spending. By investing in disaster resilience, the federal government can reduce the need for more costly future assistance and protect taxpayers from bearing the burden of increasing disaster-related costs.

The Community Disaster Resilience Zones Act of 2022 aims to build disaster resilience across the nation by creating and designating resilience zones, using FEMA’s National Risk Index to identify communities that are most vulnerable to natural hazards. TCS agrees that updating and using the National Risk Index to identify communities most in need of assistance for resilience-related projects will enable FEMA to better coordinate across the federal government and the private sector. Challenges faced by communities in implementing pre-disaster mitigation projects include lack of funding, limited capacity and resources, inadequate risk data, lack of support and collaboration, false assumptions and overconfidence, and regulatory and bureaucratic barriers. Addressing these challenges can help communities better prepare for and mitigate the impacts and future costs of natural disasters.

TCS recognizes the critical importance of ensuring equity and inclusivity in disaster preparedness and response efforts. We firmly believe all communities, particularly those that are disadvantaged and vulnerable, must be included and targeted in these initiatives. By prioritizing the needs of these communities, we can significantly enhance our nation’s disaster resilience and effectively allocate resources to those who need it most. We support the use of the NRI to pinpoint communities that are

most vulnerable to natural hazards, as it will enable FEMA to better coordinate assistance across various sectors.

TCS supports the following:

- **Strengthening Disaster Resilience:** One of the primary objectives of the proposed CDRZ and NRI is to strengthen community-level disaster resilience. By identifying and assessing risks within specific regions, these measures can help target resources effectively and allocate funds where they are most needed. This approach will not only enhance the safety and security of individuals and communities but also promote responsible and efficient use of taxpayer dollars.
- **Proactive Risk Management:** The establishment of CDRZs and the NRI will enable government agencies and local communities to take a proactive approach to risk management. By analyzing and mapping vulnerabilities, policymakers will gain a deeper understanding of the potential impacts of natural disasters, including floods, wildfires, and hurricanes. This knowledge will inform decisions regarding infrastructure development, land use planning, and emergency management, ensuring that taxpayer investments are channeled wisely to mitigate future risks.
- **Cost-Effectiveness and Resource Allocation:** The proposed CDRZs and NRI provide an opportunity to align disaster-related funding with areas of the highest risk. By prioritizing investments in vulnerable regions, taxpayers' money can be utilized in a targeted manner to enhance preparedness, response, and recovery capabilities. This approach fosters a more responsible use of taxpayer funds, reducing waste and maximizing the benefits for communities across the country.
- **Public-Private Partnerships:** CDRZs and the NRI also facilitate the establishment of robust public-private partnerships. The involvement of private sector entities, non-profit organizations, and community stakeholders can create a collaborative environment for disaster resilience planning and implementation. Through these partnerships, innovative solutions, technological advancements, and best practices can be leveraged to enhance the nation's overall preparedness. This collaborative effort not only optimizes taxpayer investments but also encourages shared responsibility in addressing disaster risks.
- **Enhanced Data and Transparency:** The NRI's data-driven approach will enhance transparency and accountability in disaster risk management. By providing comprehensive and accessible information, taxpayers and stakeholders can make informed decisions about their safety and the allocation of resources. Moreover, the availability of detailed risk data will empower communities to actively participate in resilience-building efforts, enabling them to engage in evidence-based discussions with policymakers and advocate for their needs.
- **Long-Term Cost Savings:** Investing in disaster resilience through the establishment of CDRZs and the implementation of the NRI can lead to substantial long-term cost savings. By focusing on pre-disaster mitigation measures, such as improved infrastructure and community planning, the frequency and severity of future disasters can be reduced. This proactive approach not only saves lives but also minimizes the financial burden on taxpayers associated with emergency response, recovery, and reconstruction efforts.

Considerations

While the proposal presents promising potential benefits, it is crucial to address certain concerns to ensure the optimal use of taxpayer funds:

- **Accuracy and Transparency of the National Risk Index:** The NRI's effectiveness heavily relies on accurate and transparent data. It is essential to establish a robust methodology for calculating risk, regularly update the data, and ensure transparency in the index's development and maintenance.
- **Avoiding Duplication of Efforts:** The proposal must ensure coordination and collaboration between existing disaster resilience initiatives and the newly proposed CDRZs. Duplication of efforts and conflicting strategies could result in inefficiencies and unnecessary costs.
- **Balancing Federal and Local Roles:** While federal support is necessary, it is important to strike a balance between federal and local responsibilities. Communities should be encouraged to take ownership of their disaster resilience efforts, with the federal government serving as a facilitator and providing resources when needed.
- **Cost-Effectiveness of Investments:** Any investments made in CDRZs should be carefully evaluated for their cost-effectiveness. Robust cost-benefit analyses should be conducted to determine the most efficient use of taxpayer dollars and ensure that investments yield tangible and sustainable benefits in reducing disaster risks.

Recommendations

To address the concerns outlined above and maximize the effectiveness of the proposed initiative, TCS recommends the following:

1. **Establish an independent oversight body:** Create an independent entity responsible for overseeing the NRI and CDRZ program. This body should ensure transparency, accuracy, and adherence to established standards, preventing undue influence from any particular interest group.
2. **Foster collaboration and information sharing:** Encourage collaboration between federal agencies, state and local governments, and community stakeholders to share best practices, lessons learned, and innovative approaches to disaster resilience. This will help avoid duplicative efforts and promote cost-effective strategies.
3. **Engage the private sector and nonprofits:** Foster partnerships with the private sector and nonprofit organizations to leverage their expertise, resources, and innovative solutions in disaster resilience planning. Public-private collaborations can enhance the overall effectiveness of resilience efforts while minimizing the burden on taxpayers.
4. **Regular evaluation and reporting:** Implement a system for ongoing evaluation and reporting of the effectiveness and impact of CDRZs and the NRI. This will allow for adjustments and improvements based on real-world experiences and ensure accountability in the use of taxpayer funds.

Conclusion

Taxpayers for Common Sense fully supports the establishment of Community Disaster Resilience Zones and the National Risk Index as outlined in the proposed Federal Register document. These initiatives offer a proactive and data-driven approach to disaster preparedness, response, and recovery. By effectively allocating taxpayer funds, fostering public-private partnerships, and empowering communities, we can enhance the nation's resilience and minimize the economic and human costs of natural disasters.