
September 25, 2025

The Honorable Pete Hegseth
Secretary
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301

The Honorable Kristi Noem
Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr Avenue SE
Washington, DC 20528

Dear Secretary Hegseth and Secretary Noem:

Western Governors commend the Administration for undertaking a review of the Federal Emergency Management Agency (FEMA) through the FEMA Review Council. FEMA plays a critical role in disaster response in our states and territories, and Western Governors emphasize the continued need for a central federal agency that has the capability to coordinate disaster management and provide support to states before, during, and after an event. To ensure an effective response and strengthen public confidence, many of FEMA's policies and programs can improve to be more efficient and responsive to state, local and community needs. Western Governors have developed a range of bipartisan recommendations to achieve such improvements, which are detailed in Western Governors' Association (WGA) Policy Resolution 2024-05, Disaster Preparedness and Response (attached). This letter highlights some of these recommendations for the Council's consideration.

Improve Intergovernmental Coordination

As stated, Western Governors emphasize there is a need for a central federal agency to coordinate disaster management across the United States, a role which FEMA currently fulfills. Western Governors emphasize the importance of this function and encourage the Council to consider opportunities to increase communication among federal agencies in disaster and emergency response. Western Governors also support increased communication between federal, state, territorial, local, and tribal governments in emergency management.

Effective disaster management and response also requires federal agencies to work with Governors and other leaders with local knowledge. As the first responders to disasters and emergencies, states, territories, local governments, and tribes have the most accurate information about local conditions and needs during the response and immediate recovery phases. FEMA should work directly with each state and territory, through Governors or their designees, to ensure that federal efforts are appropriately and effectively deployed in the immediate aftermath of a disaster.

FEMA regional offices play an important role in disaster response and recovery, and strengthening these offices and streamlining decision-making authority can help ensure timely, high quality damage assessments and closeout packages that properly compensate communities for some of their most significant losses. We also emphasize the importance of coordination between FEMA Federal Coordinating Officers (FCOs), who manage federal interagency resources in the immediate aftermath of a disaster, and Regional Administrators (RAs). Strong coordination between these two offices can ensure continuity in disaster management operations after a temporary Joint Field Office closes. We encourage the Council to consider ways to enhance the cooperation between FCOs and RAs.

Streamline Recovery Assistance

Strengthening federal emergency response and recovery processes to establish a single, comprehensive point of contact and universal intake process for individuals can reduce the administrative burden on individuals and improve the delivery of assistance. The federal agencies responsible for administering disaster recovery resources should enter into data sharing agreements to facilitate the adoption of a universal intake application for disaster assistance across federal programs. Congress is considering legislation that would require FEMA to take this step, but the federal government can take steps to improve these processes in the interim.

State, territorial, local, and tribal government officials also need accessible and clear information on available federal resources and the most effective use of those resources in disaster recovery. Complex eligibility rules, fragmented agency processes, and a lack of centralized information can prevent communities from using these resources effectively.

Provide States with Flexibility

Governors and local governments are, by design, the first responders to emergencies and disasters in states and territories. States and localities have the most complete understanding of local needs and emergency response capabilities, but can be hampered by federal requirements. Western Governors recommend that the Council review administrative and statutory barriers that limit Governors and state agencies from saving taxpayer money and expediting response and recovery efforts.

For example, when managing disaster declarations, state and local governments coordinate billions of dollars in federal grants. To help offset administrative requirements of these grants, FEMA regulations allow recipients to utilize a percentage for management costs. These management costs are limited to each specific disaster, and current regulations do not allow grantees to manage workloads across all open disasters. Congress is considering legislation that would allow grantees to utilize management costs across all open disasters. This will help build recovery and mitigation capacity, incentivize disaster close-out, and reduce the administrative costs of managing disaster response. Western Governors support congressional action and administrative steps to streamline response and recovery and reduce administrative burdens.

Prioritize Mitigation

In many cases, disaster damages could be minimized or avoided if resources were directed to pre-disaster mitigation efforts or if infrastructure planning had included the consideration of risk reduction measures for known hazards. Hazard mitigation and risk reduction are the most cost-effective ways to protect lives, property, infrastructure, and the environment from the effects of natural and human-caused hazards, and Western Governors emphasize the important role that FEMA plays in supporting and incentivizing these efforts at the state and local levels. The West in particular is vulnerable to wildfire, drought and earthquakes, and Western Governors urge the Council to consider how FEMA can work with states to better address the unique mitigation needs

associated with these events. Given the return on investment of mitigation projects, we recommend reducing the state and local cost share to the extent possible for many, if not all, of these grants.

Reexamine Disaster Thresholds

Stafford Act declarations generally respond to rapid-onset catastrophes that cause severe damage in a particular area over a defined incident period, and FEMA requires that requests for major disaster declarations be submitted within 30 days of the incident end date. However, disasters in the West are often characterized by slow-onset, compound, or cascading damages. In cases such as wildfire, drought, winter storms, or atmospheric rivers, damage can continue to accumulate and compound well after the 30-day requirement has passed, preventing accurate damage assessments and timely requests for a disaster declaration. FEMA should extend the standard application period for a disaster declaration from 30 to 60 days and permit extensions up to 90 days, if warranted.

The Council should further consider recommending that Congress amend the Stafford Act to support disaster response, recovery, and mitigation associated with slow-onset, compound, or cascading disasters by amending the major disaster declaration definition, establishing a new type of declaration and corresponding disaster assistance authorities for slow-onset and ongoing incidents, such as post-fire flooding, and requiring FEMA to develop a means to assess damage that is not limited to a discrete incident or incident period.

In the rural West, communities face additional challenges in accessing much-needed federal disaster assistance. Many rural western communities have less concentrated populations than eastern states, making it difficult for western states and territories to qualify for assistance. Additionally, certain criteria, such as considering Total Taxable Revenue of the entire state when evaluating whether to provide a major declaration for a localized event, makes it virtually impossible for large states to receive a declaration. The Council should reexamine the standards used to determine access to federal aid needed for recovery from disasters and emergencies.

FEMA should provide a determination on the declaration request within 60 days from the request's submission. Doing so would accelerate the deployment of all federal disaster assistance while minimizing uncertainty for states, territories, and disaster survivors.

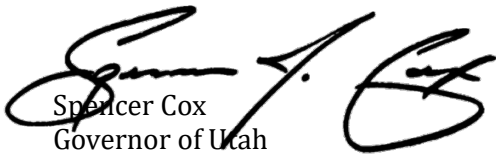
Maintain Federal Capacity for Response and Recovery

In the rural West, many communities have limited personnel, funding, and equipment to respond to a disaster and the administrative burden of requesting federal assistance can significantly hinder additional aid entering the community. While our states continue to make workforce investments to support a pipeline of skilled personnel to help meet this need, this will never bring the capacity needed to replace the federal resources during a major disaster event. When FEMA deploys, it can pull on a national pool of hundreds to thousands of reservists and existing staff, whereas that depth does not exist in each individual state. In past events in some of our states, this means state staff have been outnumbered 100 to 1. Western Governors emphasize that it is critical we continue to have federal personnel, equipment, and expertise to supplement the limited capacity of these rural communities.

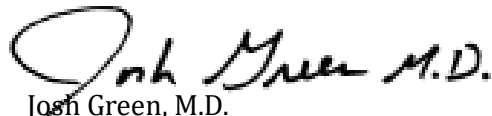
Conclusion

Western Governors agree that there continues to be a need for a meaningful federal role in disaster response, recovery and management. However, reforming FEMA can save taxpayer money and expedite response and recovery efforts. We hereby submit our recommendations in furtherance of that shared goal. We urge the FEMA Review Council to consider these recommendations, and stand ready to serve as a resource throughout the process.

Sincerely,



Spencer Cox
Governor of Utah
Chair, WGA



Josh Green, M.D.
Governor of Hawai'i
Vice Chair, WGA

Attachment



Policy Resolution 2024-05

Disaster Preparedness and Response

A. **BACKGROUND**

Major disasters, emergencies and extreme weather events are devastating to the people, property, economy, and natural environment of the communities in which they occur. The outcomes of disasters and emergencies can often be far reaching, and the public costs of disasters and emergencies have increased significantly in recent years. Governors hold the sole authority to request federal assistance when a disaster overwhelms state and local capabilities, and the federal government plays a critical role in pre-disaster risk mitigation, disaster response, and long-term disaster recovery. The first category – proactive risk reduction activities – has a very high return on investment, especially in the context of modern, climate-influenced disasters such as wildfire, extreme heat, or atmospheric rivers. The latter two categories, disaster response and recovery, tend to create a significant financial burden on individuals and communities, and this burden may be disproportionately borne by people who are facing pre-existing financial challenges. Effective disaster response and recovery is essential not only to mitigate current disasters, but also prevent additional ‘cascading disasters’ in the aftermath of the initial event. The COVID-19 pandemic reinforced the need for close coordination between federal, state, territorial, local and tribal governments in emergency management. Interagency coordination can serve to streamline the provision of disaster assistance, which in turn can help to reduce barriers to access and improve post-disaster outcomes.

B. **GOVERNORS' POLICY STATEMENT**

1. Governors need maximum flexibility to respond to disaster and emergency circumstances that may evolve quickly over the course of a disaster through the initiation of recovery. Therefore, Congress and federal agencies should expeditiously remove any barriers limiting a Governor and their executive branch agencies' ability to save taxpayer money and expedite response and recovery efforts while safeguarding lives, property, and the environment. Western Governors recognize that planning processes and disaster and emergency protocols are important aspects of emergency management, but Governors also need significant freedom to adapt those plans to changing circumstances during the evolution of a disaster or emergency.
2. Federal, state, territorial and tribal efforts to prepare for, mitigate against, respond to, and recover from emergencies and disasters must ensure programs and response efforts are inclusive, equitable, accessible, and representative of the affected communities. Development of federal disaster programs, policies, and procedures should be mindful of underserved and underrepresented communities while also addressing all survivors' post-disaster needs.
3. Western Governors encourage Congress and federal agencies to reassess the structure and administrative mechanisms of disaster mitigation grant programs to establish the most effective means of determining the necessity and delivery of federal disaster assistance. This should involve eliminating duplicative processes and establishing consistent standards

for federal grant programs, including the Hazard Mitigation Grant Program (HMGP), the State Homeland Security Program, the Building Resilient Infrastructure and Communities Program, and the Emergency Management Performance Grant Program (EMPG).

4. When managing disaster declarations, state and local governments coordinate billions of dollars in federal grants through the Federal Emergency Management Agency (FEMA). To help offset administrative requirements of these grants, FEMA regulations allow recipients to utilize a percentage for management costs. These management costs, however, are limited to each specific disaster and regulations do not allow grantees to economize by managing workloads across all open disasters. Western Governors urge Congress to direct FEMA to allow grantees to utilize management costs across all open disasters, which will build recovery and mitigation capacity, incentivize disaster close-out, and reduce the costs of disasters.
5. Federal agencies conducting disaster recovery and assistance, as well as the programs which they administer, should receive adequate and consistent funding and allow Western Governors and their designated executive branch agencies to have critical input on where those funds are needed most. The lack of speed, certainty, and consistency in deployment of federal disaster funding is a hinderance to coordinated recovery efforts and effective utilization of public funds.
6. EMPG funds are the primary funding source for local emergency managers, and funding for this program has ostensibly decreased due to inflation. Congress should increase EMPG funding to expand state and territorial capacity to provide technical assistance and expedite reimbursement for FEMA public assistance applicants.
7. Stafford Act declarations generally respond to rapid-onset catastrophes that cause severe damage in a particular area over a defined incident period. Damage from slow-onset, compound, or cascading disasters is difficult to quantify, and assistance for these disasters has historically been limited. Congress should amend the Stafford Act to support disaster response, recovery, and mitigation associated with slow-onset, compound, or cascading disasters. Specifically, Congress should amend the major disaster declaration definition to include slow-onset or other comparable terms, establish a new type of declaration and corresponding disaster assistance authorities for slow-onset and ongoing incidents, and require FEMA to develop a means to assign damage that is not limited to a discrete incident or incident period. Additionally, Congress should require FEMA to modify or extend the incident period under certain conditions.
8. FEMA requires that requests for major disaster declarations be submitted within 30 days of the incident end date. This requirement establishes an arbitrary timeline that does not reflect the reality of cascading disasters. In cases such as wildfire, drought, winter storms, or atmospheric rivers, damage can continue to accumulate and compound well after the 30-day window has passed, preventing accurate damage assessments and timely requests for a disaster declaration. FEMA should extend the application period for a disaster declaration to 60 days and permit extensions up to 90 days, if warranted. FEMA should provide a determination on the declaration request within 60 days from the request's submission. Doing so would accelerate the deployment of all federal disaster assistance while minimizing uncertainty for states, territories, and disaster survivors.

9. FEMA should provide additional resources to support its regional offices' capacity and coordination with states and territories. Each regional office must develop an understanding of local resource concerns and other local factors to help ensure timely, high quality damage assessments and closeout packages that properly compensate communities for some of their most significant losses.
10. Many rural western communities have less concentrated populations than eastern states, making it difficult for western states and territories to qualify for Individual Assistance, Public Assistance, and Fire Management Assistance Grant (FMAG) declarations. Additionally, certain criteria, such as considering Total Taxable Revenue of the entire state when evaluating whether to provide a major declaration for a localized event, makes it virtually impossible for large states to receive a declaration. Federal processes used to evaluate the need for access to disaster aid programs should be reconsidered. Federal agencies should reexamine the standards used to determine the provision of Individual Assistance to homeowners and the access to federal aid needed for recovery from disasters and emergencies that affect western states and territories. The historically underfunded U.S. Department of Agriculture Natural Resources Conservation Service's Emergency Watershed Protection Program should be revisited and strengthened.
11. Western Governors recognize that as the first responders to a disaster or emergency, states, territories, local governments, and tribes have better information about local conditions and needs in the response and immediate recovery phases of a disaster or emergency. FEMA and other applicable federal agencies should work directly with individual states and territories through Governors or their designees to jointly identify disaster risks and methods by which such risks may be addressed.
12. Federal agencies should provide state, territorial, local, and tribal government officials with accessible and clear information on available federal resources and programs and the most effective utilization of those resources in disaster recovery. WGA has worked with federal partners to improve interagency coordination on post-wildfire restoration work, including a roadmap of assistance available to communities affected by wildfire and identification of "navigators" to help communities prioritize post-wildfire restoration needs. Western Governors urge the federal government to prioritize the funding of community navigator efforts for All-Hazards events and other post-disaster restoration needs.
13. Following a Stafford Act major disaster declaration, FEMA assigns a Federal Coordinating Officer (FCO) who is representing the federal interagency resources available following a disaster. Once the Joint Field Office closes and the disaster management operations transition to the regional level, the Regional Administrator is responsible for all remaining activities. It is crucial that the FCO and the FEMA Regional Administrator have a strong relationship and coordinate closely to ensure effective disaster management operations. Another critical role for FEMA disaster personnel is the Public Assistance Program Delivery Manager (PDMG), who is the primary FEMA point of contact for applicants on their disaster projects. PDMGs are currently deployed from all areas of the state and may have vastly different knowledge on various types of disaster damage. Requiring PDMGs to be deployed regionally would improve consistency and subject matter knowledge, which would benefit applicants and FEMA alike.

14. Some western and midwestern states are at risk of catastrophic earthquakes, and mitigation assistance beyond that currently administered by FEMA is needed. Mitigation funds tied to FMAG declarations assist fire-ravaged communities, and the FMAG and Hazard Mitigation Post Fire Grant programs should be continued.
15. Western Governors recognize that community resilience is key to ameliorating the effect of many disasters and emergencies, and that damages could be avoided or minimized if resources were directed to pre-disaster mitigation efforts. Hazard mitigation and risk reduction are the most cost-effective ways to protect lives, property, infrastructure, and the environment from the effects of natural and human-caused hazards. Federal legislation should reconsider the important role of pre-disaster mitigation that reduces the risk and minimizes the effects of disasters and emergencies. When possible, pre-disaster mitigation should be incentivized at the state and local levels. Mobilizing and pre-staging disaster response resources is one strategy for mitigating the potential damages from an anticipated disaster, and FEMA should allow these activities to be eligible under HMGP. If the key to minimizing the effect of disasters and emergencies is pre-disaster mitigation, then steps need to be taken to reduce or minimize the cost share that is associated with many, if not all of these grants. Finally, infrastructure planning should include consideration of risk reduction measures for known hazards and address the dynamic hazard profile created by a changing climate.
16. Western Governors encourage the Administration to consider actions to increase communication and cohesion of federal agencies in disaster and emergency response. The Administration should consider placing a federal agency in the lead role to coordinate communication between and cohesion of federal agencies in disaster and emergency response. Strengthening federal emergency management processes to promote single, comprehensive points of contact and universal intake processes for individuals would streamline state-federal coordination and help ensure that individuals are not burdened by federal program administrative processes. Federal agencies are encouraged to enter into data-sharing agreements. Western Governors support the adoption of a universal intake application for disaster assistance across federal programs. Western Governors also support the consideration of a national emergency management strategy to provide consistent lines of communication between federal, state, territorial, local, and tribal governments.
17. Western Governors recognize the need for clear, consistent, accurate and timely communication about the scope and scale of disasters and emergencies, both between all levels of governments and between governments and their constituents. Clearly articulating what is known and what is not known about a disaster or emergency is critical to developing and executing an effective response from governments, promoting public confidence in those response actions, and empowering citizens to make informed decisions about their safety and welfare.
18. Extreme weather and wildfires pose significant risks and challenges to communities, public health and safety, and livelihoods. Additionally, they create potential liability for electric companies, regardless of the cause of the wildfire. The threat of significant liability can destabilize the financial health of electric companies, threatening their ability to continue operations. However, demands for additional clean electricity continue to rise. Keeping electric companies viable is essential to our energy needs and future economic development within our states. Western Governors recognize, that unlike other natural disasters,

wildfires create pose an exceptional liability risk for electric companies, placing them in a position that jeopardizes their ability to provide essential power services amid hotter and longer fire seasons. Western Governors urge Congress to collaborate with regulators, policymakers, and stakeholders to explore collaborative approaches to address the potential for large liabilities associated with wildfires. These approaches should consider that utility companies are not structured to meet the required risk diversification, solvency, or other conditions traditionally associated with insurance products.

19. Federal agencies should consider reducing or eliminating cost share requirements in instances where those requirements expose states to burdensome financial liabilities. For example, Other Needs Assistance, a subset of Individual Assistance provided by FEMA, has a 25 percent state cost share. Adding or expanding benefits under the umbrella of Other Needs Assistance increases state costs with no mechanism to relieve these costs for large-scale disasters.

C. GOVERNORS' MANAGEMENT DIRECTIVE

1. The Governors direct WGA staff to work with Congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

This resolution will expire in June 2027. Western Governors enact new policy resolutions and amend existing resolutions on a semiannual basis. Please consult <http://www.westgov.org/resolutions> for the most current copy of a resolution and a list of all current WGA policy resolutions.