



May 8th, 2020

Regulatory Affairs Division
Office of Chief Counsel
Federal Emergency Management Agency
8 NE Ste. 1007
500 C Street SW
Washington, DC 20472-3100

VIA Federal eRulemaking Portal: <http://www.regulations.gov>

RE: Docket ID FEMA-2019-0018/Disaster Recovery Coalition of America (DRCA) Comments on the Building Resilient Infrastructure and Communities Policy

To FEMA's Office of Chief Counsel:

The Disaster Recovery Reform Act of 2018 (DRRA) was signed into law as part of the Federal Aviation Administration Reauthorization Act of 2018. To assist with the implementation of a new authority under DRRA, the Federal Emergency Management Agency (FEMA) created the Building Resilient Infrastructure and Communities (BRIC) Program and on April 17, 2020, and published a draft policy to provide stakeholders the opportunity to provide guidance on how the program will be administered.

Given the current challenges associated with the COVID-19 response, the Disaster Recovery Coalition of America (DRCA) supports FEMA's continued efforts to work closely with public and private stakeholders by accepting comments on the proposed BRIC policy.

As background, DRCA was organized in 2008 to help advise and lead disaster recovery contractors as an industry, to educate government decision makers and public opinion leaders on the industry's role in helping constituents prepare for, respond to, recover from and mitigate against disasters, and to advocate for government support on issues unique to the disaster recovery industry. Over the last decade, our membership has been committed to building a more disaster resilient nation so we're hopeful the BRIC guidance will be finalized as soon as possible to allow communities to access the tools and resources they need to implement resilient, innovative mitigation plans and projects moving forward as we head toward yet another hurricane season.

DRCA's membership would like to thank FEMA for the opportunity to review and provide comments on the proposed policy for the BRIC grant program. We have reviewed the proposed policy and would like to offer some ideas on areas where innovative materials can provide cost-effective Green Solutions to reduce risk, provide long-term sustainability and improve resiliency of our infrastructure.

New Technology for Hazard Mitigation Assistance:

The Hazard Mitigation Assistance (HMA) program referenced in the proposed policy identifies several eligible activities, such as Soil Stabilization, Floodplain and Stream Restoration, and Green Infrastructure. These types of mitigation projects have benefited over the past 20 years by using over 15 million square yards of an Engineered Earth Armoring System (EEAS) consisting of High-Performance Turf Reinforcement Mat (HPTRM) and Engineered Earth Anchor (EEA) technology.

New Technology Provides Long-Term, Cost-Effective, Environmentally Beneficial Solutions:

HPTRMs have been tested and approved by the U.S. Army Corps of Engineers (USACE) and are currently being utilized to protect and improve our nation's levee infrastructure with up to a 500-year resiliency across the country. We would be happy to provide a case study detailing how the USACE used this technology to armor more than 100 miles of levees in New Orleans. Additional cases studies can be provided from the Reinland Channel project, the Jackson-Hatfield International Airport project, and the Mountain Creek Bank Stabilization project as examples of the effectiveness of EEAS technology for permanent mitigation applications. When compared to alternate traditional solutions, HPTRMs can provide a long-term, cost-effective, and environmentally sensitive solution with tested and proven results.

Project Considerations to Improve the Effectiveness of Mitigation Projects:

HPTRMs are just one example of an innovative technology that has improved the effectiveness of our country's mitigation projects. The proposed BRIC Policy outlines the minimum requirements for Mitigation Projects in Section D.3 (Line 171 -208) and states that each mitigation project must follow the most current codes, standards, and specifications, must be technically feasible and effective, must provide a long-term solution, and must be a cost-effective design to increase the infrastructure's resiliency.

In addition to these requirements, we suggest that the following direction be provided regarding Mitigation Projects:

- Projects are encouraged or incentivized to incorporate innovative materials and/or green solutions in order to improve the cost-effectiveness and the effective design life of the project.
- Projects are encouraged to utilize solutions that provide the lowest carbon footprint alternative in order to reduce the overall environmental impact of the project.
- Projects are encouraged or incentivized to utilize materials manufactured or assembled within the U.S. in order to support our local and national economy.
- Projects are encouraged utilizing solutions that have proven success with other agencies such as USACE and EPA.

The Importance of Providing Applicants with Mitigation Best Practices on New Technologies and Solutions:

We also believe that FEMA should provide applicants with a best practices guide that includes technologies and solutions that have proven long-term results. For example, HPTRMs have been recognized by the Environmental Protection Agency as a Best Management Practice (BMP) to improve water quality. Resources like the EPA *Storm Water Technology Fact Sheet* can be used as helpful references to help applicants ensure they are meeting the conditions outlined in the activity eligibility criteria.

Partnerships with Non-Governmental Organizations:

Additionally, we believe FEMA should consider adding language that allows state and local governments to apply for funds that will be utilized in partnership with nongovernmental organizations to provide the best possible risk reducing and resilient mitigation project. As an example, we can provide a case study from Mountain Creek that was spearheaded by a nonprofit organization in partnership with the City of Chattanooga. This project yielded a long-term resilient mitigation solution that has helped improve in the environmental health of the surrounding ecosystem.

We hope our comments are encouraging and helpful in the development and execution of this policy. Please let us know how we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Casey A. Long', written in a cursive style.

Casey A. Long
Managing Director
DRCA

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