

United States Senate

WASHINGTON, DC 20510

June 2, 2025

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

The Honorable David Richardson
Senior Official Performing the Duties of
FEMA Administrator
500 C St SW
Washington, DC 20024

Dear Secretary Noem and Acting Administrator Richardson:

Thank you for the opportunity to provide public comments on FEMA's disaster response and recovery operations. We are writing to ask you to consider practical reforms to improve the organization and administration of the Federal Emergency Management Agency (FEMA). FEMA was originally structured to respond to large-scale hurricanes and disasters on the East Coast, and its current – and outdated – model reflects that legacy. Practical reforms are warranted to better serve communities in the Western United States.

We want to emphasize that serious, targeted reform is the answer to these pressing problems – not dismantling FEMA altogether. The federal government has an important role to play in assisting state and local governments in the wake of natural disasters. Weakening or eliminating federal disaster assistance when state and local resources across the West are overwhelmed and depleted would be a dangerous step backwards. FEMA's mission is simply too important to abandon

Western states face a distinct and growing threat: namely, catastrophic wildfires followed by cascading disasters such as landslides, flooding, and water system failures that compound damage and slow recovery. These cascading events – which can happen years after an initial fire – are devastating, and FEMA has repeatedly struggled to respond effectively. As New Mexicans learned in the wake of the Hermit's Peak/Calf Canyon fire and Californians in the wake of the Palisades fire, and Hawaii residents after the Maui wind-driven fires, FEMA's protocols and funding mechanisms aren't built to address the rapid domino effect that occurs after major wildfires. Events that are interconnected are treated as isolated occurrences, leaving affected communities without the timely, comprehensive support they deserve.

FEMA's reimbursement formulas and policies currently require that public infrastructure be rebuilt to its pre-disaster condition in order to qualify for full reimbursement. While I understand the intent behind these rules—to restore essential infrastructure equitably—they do not adequately address the unique and escalating risks associated with post-wildfire environments, especially with regard to flood-related infrastructure such as culverts, bridges, and drainage systems.

After a wildfire, watersheds are severely destabilized. Vegetation loss, soil degradation, and hydrophobic soils result in dramatically altered runoff patterns, increasing both the speed and volume of post-fire flooding. The City of Las Vegas, New Mexico lived this harsh reality during the Fiestas last year, when floods paralyzed the city over a year after the Hermit's Peak/Calf Canyon fire. As a result of these floods, the business community lost out on their largest income-

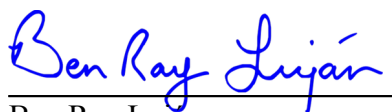
generating event of the year. These harsh post-fire flooding conditions mean that infrastructure like culverts, which may have been appropriately sized before a fire, are no longer adequate or safe in the changed landscape. Rebuilding these structures “as they were” effectively ensures that they will be overwhelmed during the next major rain event. FEMA’s reimbursement formula should be revised to allow and encourage local governments and agencies to rebuild smarter and stronger, particularly in high-risk post-wildfire areas. If infrastructure is likely to fail under new, foreseeable conditions like post-wildfire floods, federal policy should not prohibit communities from adapting their designs accordingly.

In addition, individual assistance offered by FEMA is insufficient to help families and small businesses get back on their feet. Many disaster survivors are shocked to learn that reimbursements for personal property loss, home repairs, or temporary housing fall far short of the actual costs. This disparity leaves middle- and low-income families and businesses facing a steep financial cliff, even after receiving federal aid. While Congress has stepped in to fully reimburse New Mexico families for losses from the Hermit’s Peak/Calf Canyon fire after the Federal government started the largest fire in the state’s history, comprehensive financial reimbursement is not the norm. In Maui, recovery is estimated to exceed \$12 billion, a total of four times what the federal government is anticipated to contribute. The property and economic damage in California is as high as \$275 billion. We need to revisit how individual assistance is calculated and ensure it reflects real-world rebuilding and living expenses.

Last but not least, a growing number of Western disaster survivors lack insurance altogether. In high-risk areas like wildfire zones, insurance has become prohibitively expensive—or unavailable entirely. This leaves many households completely dependent on FEMA for recovery support. Yet FEMA’s systems and standards often assume a baseline level of private insurance coverage that no longer exists for a significant portion of affected residents. FEMA must adapt its policies and funding levels and work with other Federal agencies to meet the needs of those who fall into this widening gap and ensure that recovery is possible for those who, through no fault of their own, can’t obtain insurance.

Thank you again for the opportunity to contribute to this critical dialogue. We hope FEMA will take this input seriously and act swiftly to adapt to the changing landscape of disaster response.

Sincerely,



Ben Ray Lujan
United States Senator



Martin Heinrich
United States Senator