

Federal Emergency Management Agency
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RE: Docket ID FEMA–2019– 0018

The National Rural Electric Cooperative Association (“NRECA”) appreciates the opportunity to submit comments on FEMA’s Proposed Policy titled “Hazard Mitigation Assistance: Building Resilient Infrastructure and Communities”

The National Rural Electric Cooperative Association is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to over 42 million people in 48 states.

Every year, NRECA's member cooperatives spend billions of dollars to maintain, repair, harden, upgrade and generally improve system resiliency. The goal of these projects is to reduce the number of outages caused by future disasters and to provide the most reliable electric service possible. And, in many cases, such maintenance and upgrades may be required by those that lend capital to electric cooperatives – e.g. USDA’s Rural Utilities Service, the National Rural Utilities Cooperative Finance Corporation and CoBank. In addition, some states strongly encourage and may require electric utilities to harden and underground their facilities to protect customers from prolonged outages.

Because of the capital intensive nature of the electricity industry, electric cooperatives, which serve 364 of the nation’s 395 persistent poverty counties¹ look to FEMA mitigation funds to assist with, supplement and leverage but not supplant, the capital investments that electric cooperatives make in the interest of hardening systems and mitigating future storm damages.

NRECA recognizes that our members are not eligible to receive BRIC funds directly, nevertheless we are ready, willing and able to partner with BRIC-eligible entities in order to meet the goals of the BRIC program. And, electric cooperatives are uniquely situated to do so.

In the Purpose section of the Proposed Policy FEMA notes that “(T)he BRIC program is designed to promote a national culture of preparedness and public safety through encouraging investments to protect our communities and

¹ Persistent poverty counties are defined by the U.S. Department of Agriculture’s Economic Research Service as those counties where 20% or more of the population has lived in poverty for the last 30 years.

infrastructure ...” Electricity is essential to safeguarding the public safety and health and indeed underpins much of the ability of communities to operate. Without reliable electric service, health care facilities, agricultural operations, financial transactions, water and sanitary sewer, telecommunications and other sectors of our communities are unable to resume post-disaster operations. The restoration of power in recovering from disasters is a vital first step to returning communities to steady state operations. The more resilient the electricity system the fewer disaster-caused outages and the faster the community recovery. Therefore, we would argue that electric cooperatives are valuable partners for the BRIC- eligible entities in designing and executing mitigation projects to enhance community resiliency.

The Importance of Partnerships

NRECA appreciates the Proposed Policy’s recognition of the importance of partnerships to the BRIC program. As FEMA has noted in recent presentations to stakeholders, “Partnering ... amplifies mitigation investment and its effects”. Principle 3 of the Proposed Policy commits FEMA to value projects that “(P)romote partnerships and enable high-impact investments to reduce risk from natural hazards with a focus on critical services and facilities, large-scale public infrastructure, public safety, public health, and communities.” As owners and operators of large-scale public infrastructure projects (electric generation, transmission and distribution systems), electric cooperatives contribute to public safety in the communities we serve. Electric cooperatives are uniquely qualified to partner with state, local and tribal governments to plan and implement mitigation projects that promote community resilience. Examples include working with community institutions such as hospitals and schools to enhance those institutions’ resilience. As cooperatives, NRECA members operate according to seven cooperative principles, the 7th of which is Concern for Community.

In order to further focus on the importance of partnerships to a successful BRIC program, we recommend that FEMA add a 5th point to Section C – Uses of Assistance - of the Proposed Policy. The additional point should reflect that, as part of FEMA’s evaluation of proposed projects and decision on whether to fund projects, FEMA will give extra weight to, and favor those applications for BRIC funding that reflect unique and creative partnerships.

For our part, the approximately 900 rural electric cooperatives providing safe, affordable and reliable electricity in 48 states will continue to reach out to entities that are potential eligible recipients of BRIC funding to explore partnership opportunities and projects that will support preparedness and public safety in our communities.

Respectfully submitted,



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