



2005 Market Street, Suite 1700 215.575.9050 Phone
Philadelphia, PA 19103-7077 215.575.4939 Fax

901 E Street NW, 10th Floor 202.552.2000 Phone

April 12, 2017

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

Re: Docket FEMA-2016-0003, Comments on the Supplemental Advance Notice of Proposed Rulemaking regarding the Public Assistance Deductible

Dear Sir or Madam:

I am writing to convey my strong support for FEMA's public assistance deductible proposal as a common sense approach for managing the threat of natural disasters. Rewarding states for investments in risk reduction will bring down the overall costs of disasters and better prepare our citizens and communities for unforeseen weather events.

The proposal does an impressive job of balancing the need for considering complex factors in declaring a major disaster and the need for low administrative burden and simplicity of implementation. Moreover, it clearly describes the series of factors to be weighed in determining each state's deductible.

The deductible is needed now more than ever, as the federal government declared no less than 36 disasters in 2016 involving floods or hurricanes. In October 2016 Hurricane Matthew caused 49 deaths and cost \$10 billion when it hit the southeastern United States. Much of the impact from this storm occurred in South Carolina.

Planning for disasters is a shared responsibility, but a 2016 report by the Government Accountability Office (GAO) found that the federal government spent \$277.6 billion on disaster assistance from 2005 to 2014. Greater collaboration is needed. The federal government, states, and localities must work together to ready our communities for disasters.

The deductible proposal is an important part of the solution because its ultimate purpose is to motivate more investments in mitigation by multiple levels of government, and we know such investments pay off. Research has found that every dollar spent on mitigation results in \$4 of benefits.

During my four decades as Mayor of Charleston, many extreme weather events flooded the city, which is bordered by two rivers and the Atlantic Ocean. In 1984, Charleston adopted its Master

Drainage and Flood Plain Management Plan, which led to the creation of revenue streams, including participation from building owners to help finance major drainage projects that have provided relief in many areas of the city, including the historic and low-lying peninsula and the large suburban areas that confront different flooding challenges. To date, the city has spent or set aside more than \$235 million to complete ongoing projects.

The city's strategy is based on the principle that reactive measures are not enough. Flooding events will get worse over the coming century, and only by working collaboratively across national, state, and local levels will we be able to get ahead of this problem and manage the effects.

I believe that the public assistance deductible will have a positive impact on state engagement in pre-disaster mitigation and make the nation, as a whole, better prepared. I thank you for your leadership and continued dedication to finding smarter ways to deal with the high cost of natural disasters.

Sincerely,

Joseph P. Riley

A handwritten signature in cursive script that reads "Joseph P. Riley, Jr." The signature is enclosed in a thin, light-colored rectangular border.

Former Mayor
Charleston, South Carolina
Distinguished Fellow, The Pew Charitable Trusts