

Comment Submitted to DHS-2025-0013

From: Dawn Brantley

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To the FEMA Review Council,

As the Director of a state emergency management agency with over 17 years of service across local, regional, state, and federal levels, I offer this comment with urgency and clarity: FEMA is essential in all four phases of emergency management - preparedness, response, recovery, and mitigation. That said, meaningful reform is both timely and necessary, FEMA and the Stafford Act that governs much of its authority, have only received patchwork updates since their inception. However, reform must be rooted in deep collaboration with the people who operate within this structure every day, specifically including state and local emergency management professionals. Abandoning critical structures without consultation risks undermining the very system we are trying to improve.

FEMA Is the Connective Tissue of National Readiness

FEMA is not just a federal responder - it is the essential integrator of emergency management across the nation. As emphasized in NEMA's 2025 Emergency Management Primer and Open Letter to the FEMA Review Council, FEMA's strength lies in its ability to align policy, resources, planning, training, and technical assistance across federal, state, tribal, territorial, and local governments. It serves as the synchronizing force that ensures a seamless and effective emergency management system.

Weakening that connective tissue would be a profound strategic error, resulting in slower response times, less effective recovery, increased disparities between wealthy and resource-poor jurisdictions, and a diminished national ability to mitigate future risks.

FEMA's aligning and synchronizing role ensures that national standards and best practices are applied consistently, helping to bridge differences among states with vastly diverse operational priorities and capacities. Without FEMA's leadership and convening authority, the national emergency management system would become fragmented and less effective - ultimately leaving vulnerable communities at greater risk.

States Are Already Bearing the Load

The claim that states are too dependent on FEMA is factually inaccurate. According to the National Emergency Management Association (NEMA), in FY2023 alone, states managed 23,910 disaster events without federal assistance, while only 60 events - just 0.25% - received federal disaster declarations. That means states and localities independently handled 99.75% of all

disaster events. FEMA is already only leaned on for the most severe, system-exceeding incidents.

FEMA Is the Federal Coordinator - Not Just Another Agency

One of FEMA's most critical, and often overlooked, functions is its role as the central coordinator of the federal government's disaster response. FEMA doesn't just respond to disasters - it organizes, aligns, and deploys the capabilities of more than two dozen federal departments and agencies. From DOD and HHS to DOT, USDA, and HUD, FEMA ensures these partners are not acting in silos, but as one unified team.

Dismantling FEMA's authorities and parceling its responsibilities across multiple cabinet agencies - an idea that has been floated publicly - would undo decades of hard-earned coordination gains. The result would be a fragmented federal response that is disjointed, duplicative, and ineffective. This is not theoretical - it's exactly what existed before FEMA was established in 1979, when federal disaster response was notoriously chaotic and inconsistent.

FEMA was created because coordination matters. It ensures states and local governments don't have to navigate a federal maze during crisis. Breaking FEMA apart would take us backwards, forcing states to chase multiple agencies for assistance while survivors wait longer for help. Reform, if done right, can strengthen this system, but reform must be about enhancing unity and coordination - not fragmenting roles and muddying accountability. In times of crisis, states and survivors need one door to knock on - not a hallway full of closed ones.

Rejecting a Regressive Return to Civil Defense and the Dismantling of Core Doctrine

Recent public statements, including language in the Executive Order on Resilience, indicate an intent to shift FEMA back to the outdated "civil defense" model and to roll back decades of emergency management doctrine, including the National Incident Management System (NIMS) and the Incident Command System (ICS).

These systems are the backbone of modern disaster response. They are taught, exercised, and operationally tested across the country for one reason: they work. NIMS and ICS provide the structure that allows thousands of personnel, from dozens of agencies and sectors, to function as a single coordinated unit under the most extreme conditions. This coordination is a key tenet of disaster response, and a responsibility that emergency management - at the local, state, *and federal* level - takes on so other responders can do their jobs more efficiently.

Consider the response to Hurricane Helene in Florida, which required more than 55,000 personnel across federal, state, local, and private sector organizations or the Reagan International crash in January, which required the coordinated deployment of more than 8,000 responders. Without a unified, agreed-upon, and well-tested coordination system, large-scale responses like these would unravel - leaving gaps, duplications, and failures that cost lives.

Reform Must Be Strategic, Phased, and Funded

All large agencies benefit from smart reform but any significant shift in FEMA's mission or structure must be:

- Strategic, based on real-world input from experienced professionals,
- Phased, to allow states and localities time to adapt, and
- Funded, so that responsibilities shifted from the federal government don't become unfunded mandates.

Without these principles, reform efforts will fail - and it will be survivors who suffer the consequences.

In Closing

FEMA must remain an empowered, integrated part of the national emergency management enterprise. Reform must make us more capable, not more fragmented, and any reorganization must be designed with input from the states and local partners who bear the weight of every disaster. The path forward must prioritize unity, clarity, and coordination in moments of crisis. Communities need a system they can trust - one that speaks with a single voice, acts with urgency, and delivers with consistency.

The Review Council has a profound responsibility. I urge you to proceed with evidence, experience, and a deep respect for the system that has protected millions.

Sincerely,

Dawn Brantley

Director, Massachusetts Emergency Management Agency