

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

CHUCK CHAITOVITZ
VICE PRESIDENT, ENVIRONMENTAL
AFFAIRS AND SUSTAINABILITY

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WASHINGTON, DC 20062
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May 6, 2020

Katherine Fox
Assistant Administrator for Mitigation
Federal Emergency Management Agency
400 C Street SW
Washington, DC 20472-3100

Re: Comments on the Building Resilient Infrastructure and Communities (BRIC) program guidance (FEMA-2019-0018-0002)

Dear Assistant Administrator Fox:

The U.S. Chamber of Commerce is pleased to provide comments on FEMA's Building Resilient Infrastructure and Communities (BRIC) program guidance. Policies to promote modern, resilient infrastructure have long been among our top priorities. Now, more than ever, companies and communities need multiple tools to help implement predisaster mitigation to plan ahead of and recover from the next crisis. We support finalizing the BRIC policy guidance as soon as possible, so the proposed fall 2020 notice of funding availability can move forward as scheduled.

We urge consideration of the following recommendations:

- Focus on lifeline infrastructure, such as communications, electricity, health, and water and green infrastructure as eligible projects. Such infrastructure is essential to public safety and well-being; national security, including sites identified by the U.S. government as essential; and economic prosperity.
- Provide a definition of resilience, including examples of projects that improve resilience, and clarify the types of activities that qualify for capacity building.
- Include public-private partnerships as a specific part of the nonfederal match and to mobilize private capital.
- Provide local jurisdictions with the utmost flexibility and underscore the importance of modern, resilient, and smart infrastructure in implementing building codes.
- Ensure that flood surge and sea level rise mitigation are included as eligible activities.
- Promote coordination and consultation between all relevant federal, state, and local government agencies and the private sector to develop state mitigation plans and align other predisaster mitigation programs and funding. We encourage engaging the U.S. government interagency community (e.g., HUD and USDA) to more effectively address disadvantaged community needs.

In addition, as part of the rollout, we encourage you to take advantage of the proactive nature of the BRIC program to provide resources to states, local governments, and other organizations. This approach will allow you to directly promote the new program to communities, especially with disadvantaged status, which are eligible for a larger federal match for projects, as well as to manage an increased workload associated with implementing this new program.

The Chamber stands ready to assist you as you launch the BRIC program. I look forward to following up with your team. Thank you for your leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Chaitovitz". The signature is written in a cursive style with a large, sweeping flourish at the end.

Chuck Chaitovitz