



May 15, 2025

Patrick Powers
Designated Federal Officer
Federal Emergency Management Agency Review Council
Office of Partnership and Engagement
Department of Homeland Security
2707 Martin Luther King Jr Ave. SE
Washington, DC 2003

RE: *Request for Public Input on Experiences With FEMA Disaster Responses*, Docket No. DHS-2025-0013

Dear Mr. Powers:

The undersigned national associations represent for-profit and non-profit owners, operators, developers, and property managers involved in the provision of rental housing, both affordable and conventional. We write to you as key stakeholders in the Federal Emergency Management Agency's (FEMA) disaster response efforts across the U.S. Our members collaborate with local, state and federal partners like FEMA to house displaced individuals and their families and keep our residents stably housed when disaster strikes. FEMA officials have benefitted greatly from our industry expertise and deep connectivity to local communities.

As the FEMA Review Council develops its findings and recommendations, we hope it will recognize the vital role that housing providers play in affected communities and consider changes to improve the agency's ability to activate quickly and effectively to support households and businesses impacted by disasters.

Industry is Eager to Partner with FEMA to Respond to Disasters.

We recognize the importance of FEMA's work to provide federal assistance to regions impacted by disasters and are eager to serve as a resource to FEMA during recovery efforts. When disaster strikes, housing providers, alongside our trade association partners at the state and local levels, meet regularly to share information, strategize about emerging challenges, and work with officials at all levels of government as they develop and execute recovery and rehabilitation plans. With Tropical Storm Helene and wildfires in Maui and, most recently, Los Angeles behind us, our members report being an underutilized resource post-disaster.

State and local trade associations are particularly effective partners for FEMA, and agency officials should lean on professional association staff to serve as a conduit to engage housing providers who are most active in affected communities. They are well-situated to advise FEMA on its housing initiatives, elevate housing provider and renter challenges in real time and recommend solutions that account for local realities. Associations and their industry volunteer leaders are also good resources on market dynamics, industry best practices, and the regional regulatory landscape, all of which could impact FEMA's work to assist displaced households and the business community.

Ongoing Communication and Coordination is Critical to FEMA's Success.

FEMA should consult with industry leaders throughout their process to develop and execute disaster recovery plans to ensure approaches are tailored to a community's unique housing needs. For example, in western North Carolina after Hurricane Helene, rental housing providers had difficulties obtaining potable water for their residents. Housing providers raised these concerns in forums for state and industry stakeholders, yet struggled to get FEMA's attention to address this important issue.

FEMA also should consider the importance of multifamily housing in their efforts to rapidly rehouse displaced households; FEMA policies tend to favor hotel placements. Poor communication with stakeholders and other barriers, such as rigid adherence to leasing compliance, have made it more difficult for households receiving FEMA assistance to utilize available rental housing which would stabilize their housing needs at a critical time.

For instance, to house North Carolinians benefitting from FEMA assistance after Tropical Storm Helene, the agency required housing providers to accept an eighteen-month lease term—a long-term lease according to state law. Combined with a provision allowing FEMA to release the unit and cease payments at any time with only 30 days' notice to the landlord, these requirements deterred landlord participation and ultimately, reduced the housing choices for impacted households.¹

Even in situations where a property owner and community manager were ready to accept FEMA requirements, banks could reject participation according to their own standards. Further adding complexity, FEMA imposed a third-party contractor to manage FEMA's lease agreements, which would interfere with contracts traditionally between housing providers and their residents.

Similarly, following the wildfires on the island of Maui, FEMA's housing initiatives in Hawaii suffered from low housing provider participation due to poor communication about leasing standards and inflexibility of rental assistance program requirements (which did not account for local market realities). Industry leaders attempted to address these issues with FEMA representatives, but were unsuccessful.

¹ Sam.gov, Direct Lease Housing, Notice ID 70FBR425-DL-DR4827NC (Oct. 7, 2024), <https://sam.gov/opp/4259c909ba234fb68e23f8f8bf4c8a73/view>.

FEMA Should Expand Opportunities for Rental Housing Providers to Access Rehabilitation Assistance.

Rental housing is a critical part of communities' housing needs. However, FEMA's rehabilitation assistance programs leave housing providers unable to access this assistance because in some jurisdictions, they are defined as commercial properties. Due to this exclusion, housing providers cannot obtain relief even for rental communities that have sustained serious damages rendering apartments unlivable. FEMA Home Repair assistance should be expanded beyond homeowners to account for this.²

Renters and housing providers alike suffer financial consequences from natural disasters. As their expenses are exceedingly surpassing rental income,³ housing providers must make tough decisions about whether to rebuild or maintain housing at pre-disaster levels in affected communities. This is especially challenging for affordable housing providers who operate under extremely thin margins. Expanding rehabilitation relief to rental housing providers will help preserve housing choice and affordability for millions of Americans impacted by disasters.

FEMA Should Raise Awareness of Assistance Available to Renters.

Housing providers continue to need the federal government's help to support their residents during natural disasters. Greater public awareness campaigns around available FEMA assistance are needed. Many renters are not aware that in addition to rental assistance, FEMA makes funds available for replacement or repair of damaged personal property.⁴ Following the Palisades and Eaton wildfires in California, housing providers report that many of their residents were not aware that they qualified for this assistance. (In the Los Angeles metro area, approximately 3 million residents.⁵) FEMA should increase public awareness campaigns targeting renters so impacted households can fully avail themselves of FEMA benefits and understand how to apply.

Conclusion

We appreciate the opportunity to provide feedback on the agency's response to disasters and look forward to continuing a dialogue with administration officials on President Trump's housing priorities. Please do not hesitate to contact us with any questions about our submission.

Thank you for considering our views.

² FEMA, *FEMA Quick Reference Guide: Help with Home Repair*, https://www.fema.gov/sites/default/files/documents/fema_ia-quick-reference_habitability.pdf (last accessed May 7, 2025).

³ NAA, *Breaking Down One Dollar of Rent: 2023*, <https://naahq.org/breaking-down-one-dollar-rent-2023> (last accessed May 7, 2025).

⁴ FEMA, *Renters May Apply for Federal Assistance* (Apr. 1, 2021), <https://www.fema.gov/fact-sheet/renters-may-apply-federal-assistance>.

⁵ We Are Apartments, *Metro Data – Los Angeles*, https://www.weareapartments.org/data/Los_Angeles (last accessed May 7, 2025).

Sincerely,

Council for Affordable & Rural Housing

Institute of Real Estate Management

Manufactured Housing Institute

National Affordable Housing Management Association

National Apartment Association

National Association of REALTORS®

National Leased Housing Association

National Multifamily Housing Council